

Crawley Borough Council

Environmental Health

**Food Safety and Port Health Service
Plan**

2010-2011



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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 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 2010-2011 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 has key links to the Public Health Strategy, Community Strategy and Corporate Strategy. Food safety is a key element in connection with numerous cross-cutting issues of importance regarding Crawley and Gatwick.

officers 1011 activities has been completed

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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.

Furthermore, the Food Safety Plan makes a significant contribution to the Crawley Borough Council inputs into the West Sussex Local Area Agreement by ensuring:

- Better skills for a better future
- Better health for all

This will be achieved through enhancing the following outcomes through planned interventions and the continuation of existing statutory functions in 2010 -2011 in the following areas:

- Improving workforce skills (Outcome 4)
- Promoting health (Outcome 11)
- Retaining businesses and enabling them to grow (Outcome 16)

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.

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

The 2010 – 2011 plan will also pick up the new themes of the 2008 – 2011 revised West Sussex Local Area Agreement.

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:

- 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 and D (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 E.
- To undertake food safety visits to 10% of premises rated 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 resolve complaints within no more than 120 working days from receipt depending on the type of complaint. (See Section 6 for details of our standards of service.)

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 work with in land authorities with ERTS within their borders to ensure imported food subject to control measures is dealt with effectively and efficiently.

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.

1.2 Links to Corporate Objectives and Plans

The Food Safety Service Plan is a key document within the Public Health Strategy and operates within Crawley's Community Strategy and Corporate Policy². It is integrated into the key themes from the strategy that 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).

² See Appendix A to show the integration of the various strategies.

- Peak performing people (Priority 11)
- Creating a culture of efficiency and the habit of success (Priority 12).

The Food 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 Background

2.1 Profile of Crawley Borough Council

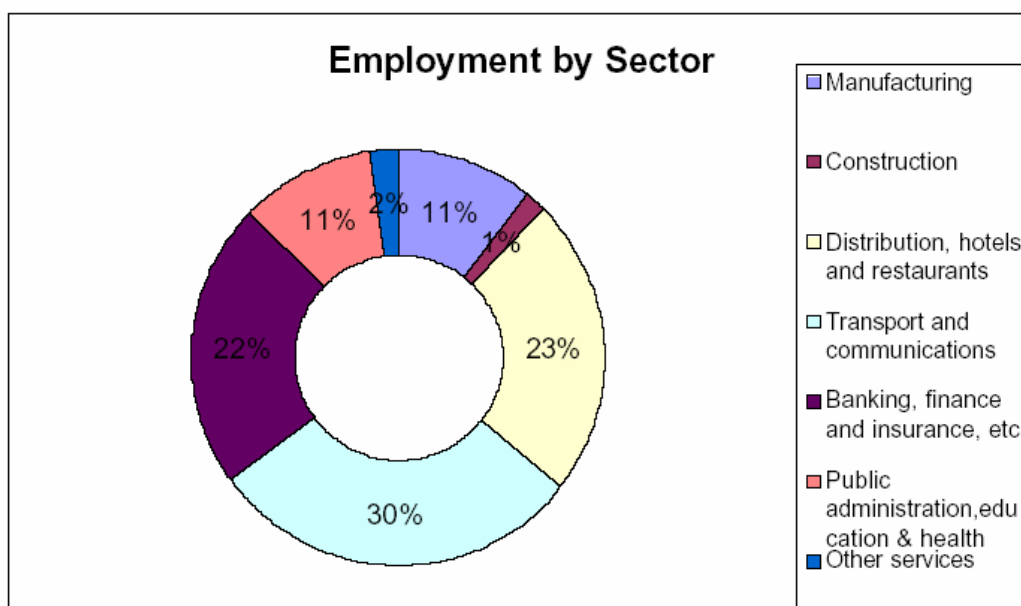
Crawley is situated in West Sussex, halfway between London and Brighton. The town has approximately below 100,000 residents. Whilst only covering a small part of West Sussex, Crawley has a high number of large and small to medium enterprises, which are located within close proximity to Gatwick Airport.

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:

- Larger restaurants and food retailers in the town centre,
- A town centre market, held on Fridays and Saturdays,
- Smaller restaurants and food retailers in the neighbourhood parades,
- Food manufacturers in the outlying industrial estates,
- Food venues at the Airport,
- 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,
- 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 this sector.



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 3. 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.

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 3 Ethnic Breakdown in Crawley (Census 2001, Crown copyright)

This service has access to Language Line for the purposes of translation at all times.

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 for 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 Constitution⁴.

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

West Sussex Control of Infection Committee: Tony Baldock/Paul Baskerville

- 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. 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.

⁴ See Intranet documents.

- 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 respectively⁵.

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

(4) Staffordshire County Council
County Laboratory & Scientific Services
Martin Street
Stafford
ST16 2LG

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.

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.

2.1 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 at the 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 2010-2011.

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 CCDC, 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 as amended 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 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..

Clearance of consignments high risk non animal origin food stuffs. Clearing such products is a time consuming operation requiring the checking of documents, identification of product and physical examination and sampling of 50% consignments. 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 compliant facilities. This has provided the airport operators with one of the most modern and fully EU compliant Border Inspection Post in the UK.

2.5 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.

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 Planning and Environment 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.

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 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 2010010, we are able to estimate that 343 premises will need to be inspected 2010-20111011 (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 on current registration details due for inspection in the next 12 months..

Risk Rating	Points Range	Due for Inspection
A	≥92	55
B	≥72	43
C	≥42	259
D	≥31	21
E	Below 31.	16

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 COVALENT 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 the Imported Food Service. Current opening hours are 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.

3.1 Food Premises Inspections

The Environmental Health database management system (UNiform) is used by a number of local authorities including CBC. 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 UNiform 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. Significant changes have been made to the manner in which FSA returns are submitted in the last 2 years as a result of the introduction of the LAEMS system. At the time of writing the UNiform report function does not produce an XML file that will load in to the FSA system and a manual data entry will therefore be made.

The inspection programme is driven by the risk rating assigned to a premises as defined in the FSA Code of Practice. This highlights the premises which are due to be inspected according to the perceived risk due to the 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 in 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 5.1 below. Staffing arrangements are detailed in table 5.2.

3.2 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.

Astrae 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.

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

We intend to complete the food samples shown below during 2010 to 2011, subject to availability of suitable products in the Crawley area.

Sample Type	Sample Size & Number	Laboratory and Test	Type of Premises	Sampling Coordinating Body
Hot Held food e.g. pies, pasties, sausage rolls in	5	Microbiological (salmonella)	Retail	LACoRS
Imported Food		Microbiological	Kebab Shops	LACoRS
Imported Food	620	Microbiological	Famers Market & Retail Kebab Shops	LACoRS
Ready to eat shellfish	6	Microbiological	Famers Market & Retail	LACoRS
Water	24	Microbiological	Aircraft and browsers LGW	CBC Monitoring

EU Regulation 669/2009 has introduced a requirement for certain products not of animal origin to be subject to checks via a Common Entry Document on arrival within the European Union. Large volumes of goods are transported through London Gatwick Airport from the Dominican Republic and also Thailand both being countries subject to the said controls. As a direct consequence a very large increase in workloads has occurred with regard to the team based within the Airport Office and suitably qualified officers have also been taken from the Town Hall to assist as needed. The requirements within this legislation are as follows with associated sampling frequencies.

Feed and food (intended use)	CN code	Country of origin	Hazard	Frequency of physical and identity checks ⁽¹⁾ (%)
Bananas	0803 00 11	Dominican Republic	Pesticide residues analysed with Multi- residue methods based on CG-MS and LC-MS (*)	10
Vegetables, fresh, chilled or frozen (peppers, courgettes and tomatoes)	0709 60; 0709 90 70; 0702 00 00	Turkey	Pesticides: methomyl and oxamyl	10
Pears	0808 20 10	Turkey	Pesticide: amitraz	10
Vegetables, fresh, chilled or frozen (food) — yard long beans (<i>Vigna sesquipedalis</i>) — aubergines — Brassica vegetables	0708 20 00; 0709 30 00; 0704;	Thailand	Organo-phosphorus pesticide residues	50

Mangos, yard long beans (<i>Vigna sesquipedalis</i>), melon bitter (<i>Momordica charantia</i>), Lauki, (<i>Lagenaria siceraria</i>), peppers and aubergines (food)	ex 0804 50 00; 0708 20 00; 0807 11 00; 0707 00; 0709 60; 0709 30 00	Dominican Republic	Pesticide residues analysed with Multi-residue methods based on CG-MS and LC-MS (*)	50
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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.

3.6 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 are illustrated in Table 3.

Notifiable Diseases for April 2006 – April 2010

Notifiable Disease (F indicates food borne)	06/07	07/08	08/09	09/10
Campylobacter (F)	100	103	106	125
Salmonellosis (F)	21	15	19	25
Tuberculosis	27	11	0	1
Gastroenteritis (F)	2	2	0	0
Giardiasis (F)	13	7	13	6
Dysentery (F)	6	2	4	5
Cryptosporidiosis (F)	3	5	7	11
Meningitis	1	0	0	0
Measles	8	3	2	3
Typhoid (F)	2	2	2	0
Miscellaneous (F)	4	1	4	2
Mumps	5	4	4	8
Rubella	1	3	3	1
Scarlet Fever	3	5	2	4
Cholera (F)	0	1	1	0
Clostridium (F)	0	0	0	0

E. Coli (F)	2	1	3	3
Hepatitis B	1	2	2	0
Malaria	1	1	1	1
Paratyphoid (F)	0	1	0	0
Whooping Cough	1	5	0	0
Total	211	188	174	195

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.

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 attends the Sussex Food Liaison Group.

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.

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:-

- 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 2010 – 2011 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 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.

4. Scores on the Doors

4.1 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.

4.2 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.

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

4.4 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 complaint 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 2010 are shown below in figure 1.

Star Ratings as at 13/06/2010

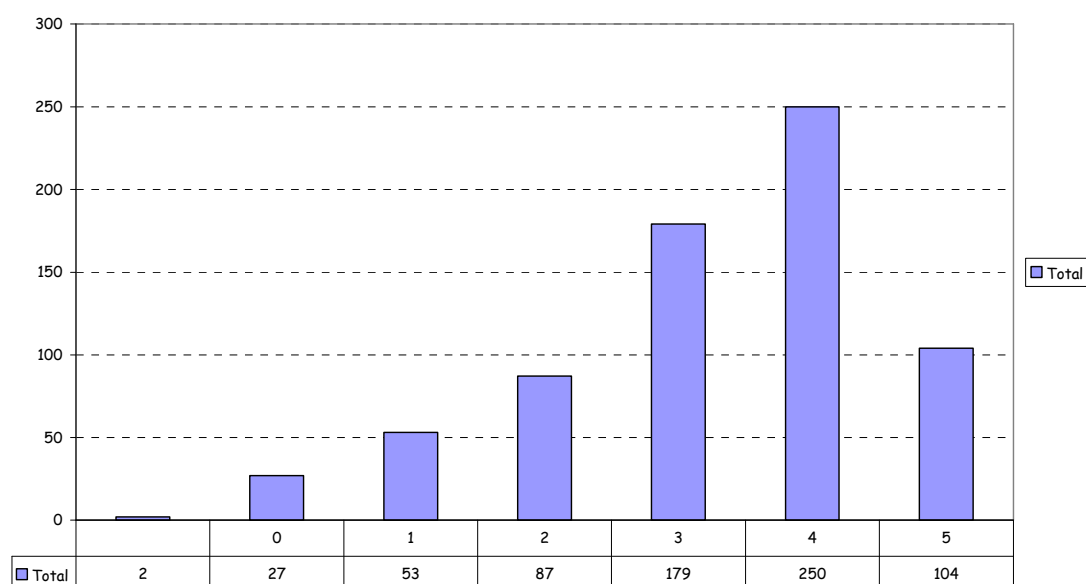


Figure 1

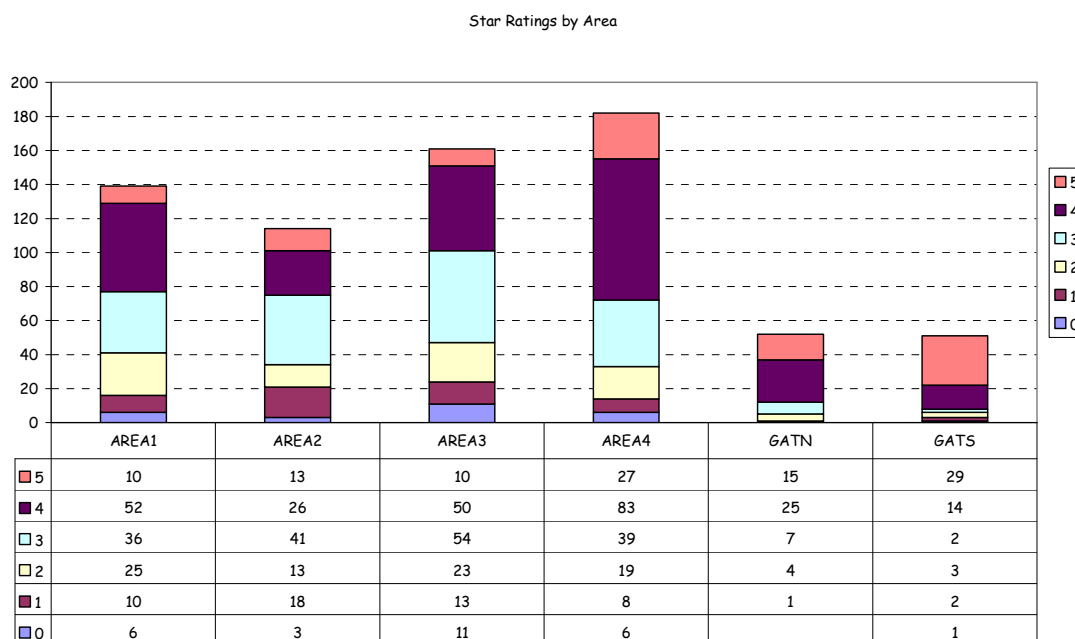


Figure 2 Star Ratings by Area

4.5 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.

4.6 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.

4.7 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. Resources

5.1 Financial Allocation

The budget available to the Food Service is as follows:

Totals allocated proportionally to the Food Team (C1023) 2010 – 2011	£
Total permanent staff	156,800
Total for recharges and central costs	79,680
Total for operational	12,750

Totals allocated proportionally to the Imported Food Team (C1021) 10 - 11	£
Total for personnel	141,750
Total for recharges and central costs	84,250
Total for Operational	40,200

5.2 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	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

5.3 Staff Development Plan 2010/2011

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 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.

6 Quality Assessment

6.1 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

- 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.)

7 Review

7.1 Review of the Service Against the Service Plan 2009-92010

Crawley produced a new Corporate Plan in 20102010 which is congruent with the new Community Strategy developed through the Local Strategic Partnership⁷⁹.. 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.

8. Scope of the Food Service.

Our work for the 2009 – 2010 consisted of 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 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	10	44	182	51	52	50

The Council's policy is to complete 100% of inspections of premises due an inspection, in accordance with the FSA risk rating system. A number of additional visits are also made each year due to new premises registrations. These visits are recorded using COVALENT being the corporate monitoring standard. Additional visits are measured in terms of % greater than 100.

- **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

7.2 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 target¹¹. 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.

¹¹ Full details are available through the corporate reports on performance.

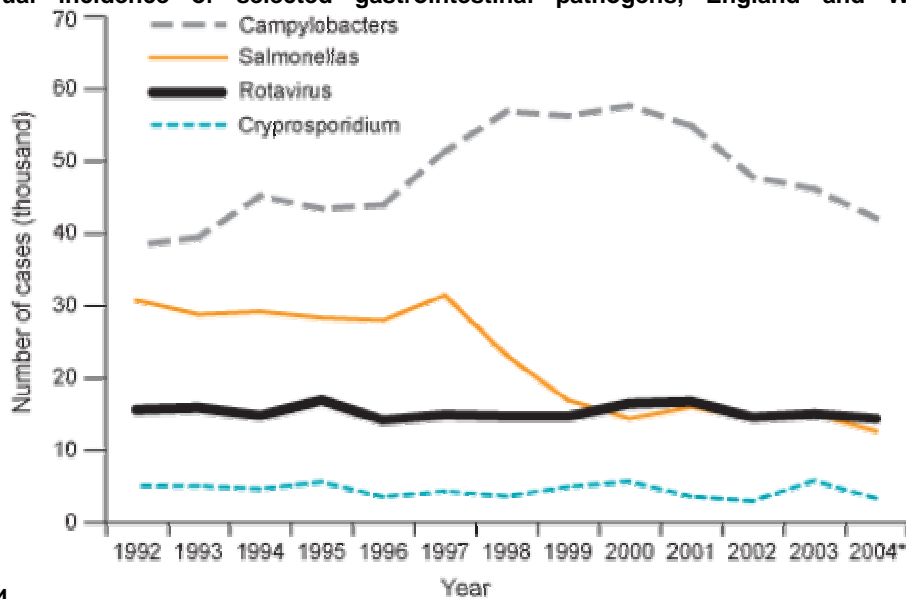
7.3 Food poisoning investigations.

The rate of Campylobacter food poisoning rose from 106106 cases to 125125. 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 09/10 from 19 to 25. 25.

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 infection is noted which may be due to weather conditions affecting water supply and storage, but is more likely to be associated with foreign travel.

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



2004

*Provisional data.

7.4 Investigations into complaints of poor food safety at premises

Overall number of complaints received.

Type of Complaint	Number of Complaints
-------------------	----------------------

	2009 -910
FADVIC (advice)	22
FCHEM (chemical contamination)	1
FFBODY (foreign body)	14
FHYGIE (hygiene of premises)	41
FLABEL (labelling)	5
FMICRO (microbiological issue)	3
FOODPE (pests in food premises)	1
Total	131

*Entered as service request in computer complaints module.

7.5 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 local Halal butchers running a seminar which was attended by 16 local businesses...

7.6 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.**

Weight of Consignment	APHA Banding for Charging Purposes	Totals 09 -10
1-1000kg	Band 1	16
101-1000kg	Band 2	52
101-5000kg	Band 3	99
>5001kg	Band 4	99
Totals		176

7.7 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:
- Prosecution of Food Businesses Operator for 6 offences resulting in a fine of £2000 per offence and full award of costs. (CBC v Gundogdu)

- 16 Hygiene Improvement Notices.

7.8 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.

In 2010 CBC will be launching a nutrition scheme based on the Surrey Eat Out Eat Well award to compliment the Scores of the Doors Hygiene award launched in 2008. This scheme will involve the assessment of menus with food businesses and the level of expertise of the chef in regard to nutrition and an award of a bronze, silver or gold award will be made. All the staff who undertake food hygiene interventions will be used to assess businesses for the award and they have all received training to level 2 standard in Nutrition and Special Diets as awarded by the Chartered Institute of Environmental Health.

- CBC also facilitated a Safer Food Better Business seminar for Halal butchers within Crawley.
- Identification of fish and shellfish course in conjunction with Central Sussex College.

7.9 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, Budgetary control)
- Evaluating and Planning (such as creation of this service plan to meet framework requirements.)

7.10 Identification of any Variation from the Service Plan

There were no major variations from the service plan in 2009-2010.

7.11 Improving the Service, Responding to Challenges.

The food and port health teams are both included in the measurement of NI 182 satisfaction with regulatory services. In 2009-2010 the service had a score of 88% of business be satisfied.

7.12 Improving Communication.

- Training and Promotions. We have reviewed the opportunities for increasing communication through training sessions and provision of other information. Last year we:
 - 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 700 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.

8.0 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.

Bearing in mind the importance of completing accurate FSA returns, Crawley’s UNiform system presents considerable frustration. 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.

- 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).

9.0 Response to Reactive Work

- Having analysed the customer response surveys, we discovered some anomalies: the results had some extremes 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 from 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.

10.1 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.
- As a result of EU 669/2009 a massive increase in sampling of fruit and vegetables has occurred. At the time of writing CBC has dealt with over 1500 Certificates of Entry documents and is sampling 50% of products arriving at London Gatwick Airport for pesticide residues.

10.2 Active Networking.

- In 2009 CBC appointed a Healthy Workplace Officer who is working on joint projects with the PCT which include nutrition in the workplace.. 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.

11 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.

The food safety service was also audited in 2010 as a part pf the Sussex Inter Authority Audit exercise. This initiative was planned to demonstrate compliance with the framework agreement issued by the Food Standards Agency. The audit found the Food Safety Service to be complaint in most respects but action is required with regard to Approved Premises. This is already being addressed by way of low cost staff training and reallocation of workloads amongst the Food Safety Team. A copy of the Food Safety Audit is appended to this report for information purposes.

12.0 Staffing Allocation.

No staff changes occurred in 2009/2010.

13.0 Staff Development Plan 2010/2011.

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.

14.0 Quality Assessment.

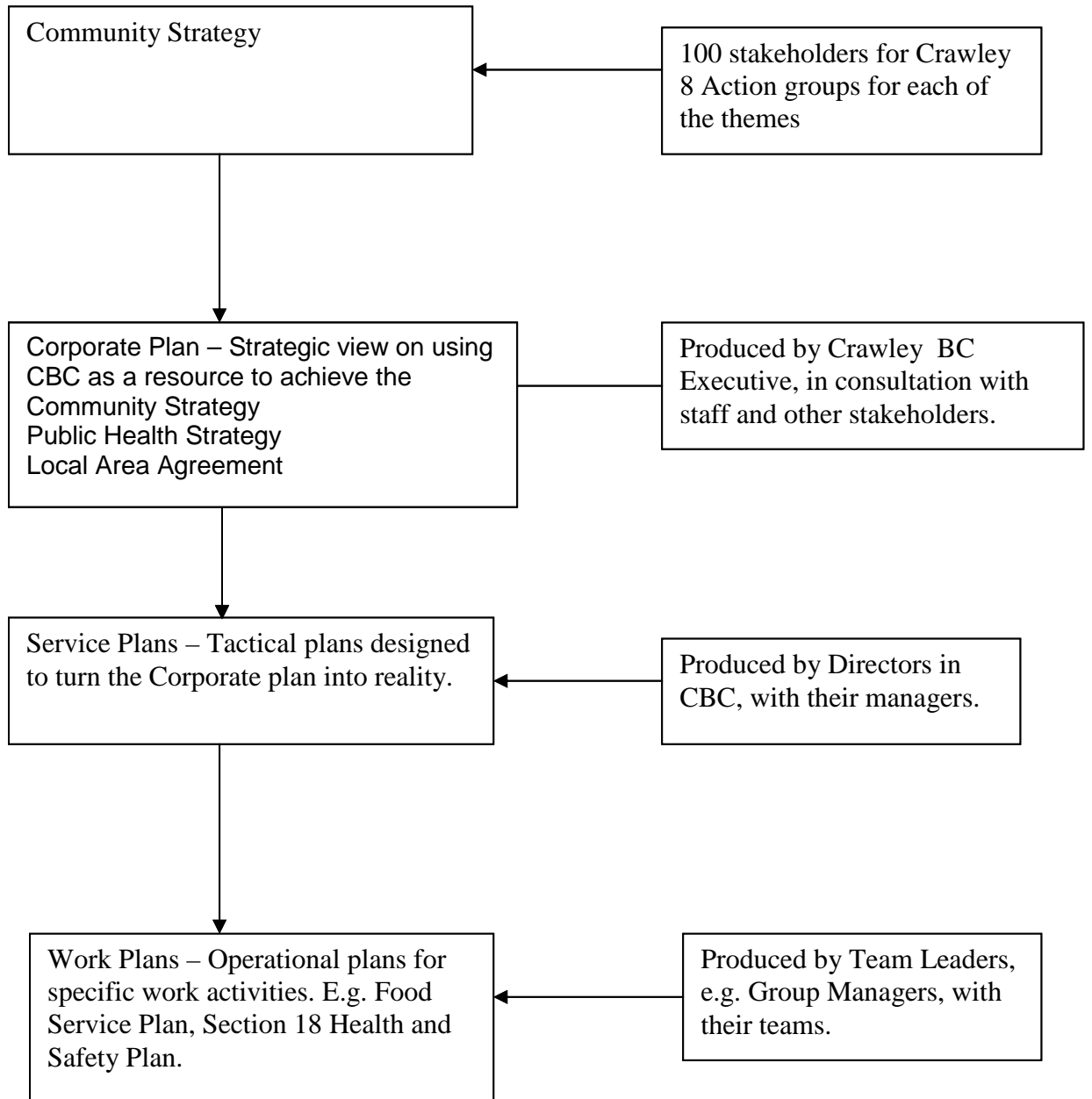
As described above, monitoring and evaluation is carried out using statistical means and by use of customer survey. Individual officers are also monitored, through reviews of inspection records and shadowed (i.e. accompanied visits.¹³)

The Group Manager also carries out a number of shadowed inspections to ensure staff within the Team carry out their duties in a consistent and professional manner.

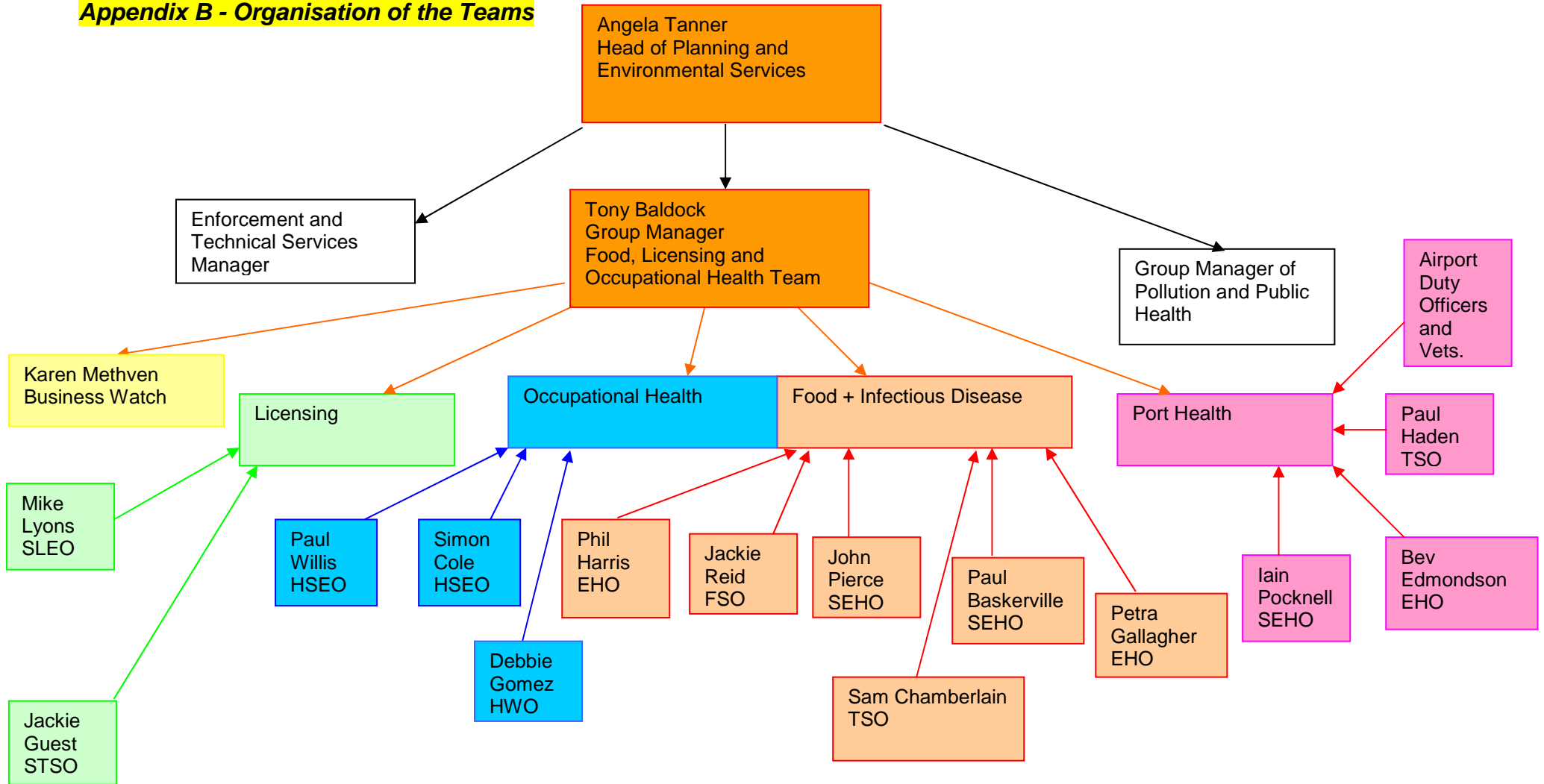
¹³ Details of the procedure used to ensure the quality of the service is available on request.

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

(4) Staffordshire County Council
County Laboratory & Scientific Services
Martin Street
Stafford
ST16 2LG

APPENDIX D FOOD SAFETY SERVICE AUDIT 2010

Crawley Borough Council

Sussex Chief Officers' Group

Food Safety Inter-Authority Audit

24th June 2010

Final Report

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1.0 Introduction

Audits of Local Authorities' food safety and hygiene "official control" services are part of the Food Standards Agency's (the Agency) system for helping to maintain and improve public health, consumer protection, and consumers' confidence in the food chain.

Agency audits are based on "The Standard" in "The Framework Agreement on Local Authority Food Law Enforcement" (The Framework Agreement), and include local arrangements for, amongst other things, inspections, audits and other interventions, documented procedures, qualifications and training of officers, enforcement options, internal management, food safety promotion, and educational activities.

The Agency is aware of the diversity between different Local Authorities in the way that they provide their food safety and hygiene official control services, which reflects differing local needs and priorities.

Although the main aim of the Agency's audit scheme is to maintain and improve public health, consumer protection and confidence by ensuring that Local Authorities provide effective food safety and hygiene official control services, it also provides opportunities to identify and disseminate good practice.

The Sussex Chief Officers' Group commissioned this inter-authority audit exercise in May and June 2010. Ten of the twelve East and West Sussex District and Unitary Local Authorities participated, the other two having recently been audited by the Agency itself.

This was a "partial audit" covering paragraphs 3, 4, 5, 7, 15, 16 and 19 of The Standard, and based on the Agency's audit protocol and checklists for "Database Management, Inspections and Internal Monitoring Arrangements".

One day was allotted for the on-site audit of each Local Authority, during which the auditor checked officer authorisations and training records, intervention records, and correspondence with food business operators.

The limited timeframe means that this report is necessarily brief, and only covers a very small sample of the Authority's food safety and hygiene official control activities.

The conclusions and recommendations are based solely upon the records that the auditor examined.

Nonetheless, they are based on the evidence presented by the Local Authority in the pre-audit documentation, the auditor's observations during the on-site audit, and following discussion with the Audit Liaison Officer.

The recommendations are designed to enable the Authority to be prepared for an Agency audit that is likely to come in due course.

This report was finalised after taking into consideration any comments made by the Authority on the initial draft.

2.0 Executive Summary

- 2.1 Crawley is an English District Council and therefore has responsibility for conducting official controls relating to food safety and hygiene. Crawley is also responsible for conducting “Port Health” controls and other related duties at London Gatwick Airport. The County Council has responsibility for official controls relating to food standards and feeding stuffs.
- 2.2 At the time of the audit Crawley had a 2010-2011 Food Safety and Port Health Service Plan that met the requirements of the Service Planning Guidance in the Framework Agreement, including those relating to reporting, approval and performance review.
- 2.3 A comprehensive set of documented policies and procedures have been drawn-up and kept up-to-date to cover the food safety and hygiene official control and follow-up activities that are required by Section 4 of The Standard.
- 2.4 Authorised officers have been appointed to undertake official controls relating to food safety and hygiene, and qualification and training records demonstrated that all of the authorised officers possessed one of the qualifications that are a pre-requisite for appointment and were achieving at least the minimum 10 hours food-law related CPD training per year.
- 2.5 Officers had been authorised in accordance with The Constitution and issued with authorisation documents detailing the legislation under which they had been authorised to act and the extent of their powers under the legislation, although it was unclear whether The Constitution also enabled officers to be authorised to act under legislation made or having effect under the 1972 European Communities Act.
- 2.6 The approval processes and documentation for establishments that had been approved under Regulation (EC) No. 853/2004 generally took account of legislative requirements and centrally issued guidance, although establishments that had been approved under previous UK hygiene Regulations had still to be re-assessed for approval under Regulation (EC) No. 853/2004 at the time of the audit.
- 2.7 Inspections and audits of businesses subject to Regulation (EC) No. 852/2004 had covered all relevant factors and intervention ratings appeared to be appropriate, although some food hygiene interventions had not been conducted at the minimum frequency required by the Food Law Code of Practice.
- 2.8 However, inspections and audits of establishments subject to Regulation (EC) No. 853/2004 had generally not been recorded on the relevant supplementary form for the type of business, and some essential records relating to approved establishments could not be located at the time of the audit.
- 2.9 Officers in Crawley use a mix of informal options and hygiene improvement notices to secure compliance, and it was evident that officers’ post-inspection follow-up processes, procedures, decisions and documentation generally met expected standards.
- 2.10 Post-inspection reports and follow-up communications were in accordance with legislative requirements and centrally issued guidance, including clear

differentiation between legislative requirements and recommendations, and inclusion of details required by Annex 6 of the Food Law Code of Practice.

- 2.11 Processes and procedures for internal monitoring of service performance are in place but need to be further developed and fully implemented in order to be completely effective.

3.0 Audit Findings

3.1 Organisation and Management

- 3.1.1 Under this section, the Agency determines whether the service plan is in accordance with the service planning guidance in the Framework Agreement, looks for approval of the service plan at relevant Member or senior officer level (according to each Local authority's preference and local arrangements), looks for at least annual reviews of service performance against service standards which are considered at relevant Member or senior officer level, ensures that any shortfall in service performance is addressed in the following year, and that any lack of resources that adversely impacts on service delivery is brought to the attention of Members.
- 3.1.2 At the time of the audit Crawley had a 2010-2011 Food Safety and Port Health Service Plan that covers official controls for food hygiene and safety. Official controls for food standards and feeding stuffs are undertaken by the County Council's Trading Standards service and are not covered in this audit.
- 3.1.3 Crawley also undertakes imported food control and other "port health" related duties and responsibilities at London Gatwick airport which were not specifically covered during this audit.
- 3.1.4 The format and content of the service plan and the services to be delivered within its framework take account of the Agency's service planning guidance set out in Chapter 1 of the Framework Agreement, and meet the requirements of Section 3 of The Standard.
- 3.1.5 The service plan includes the summary of a performance review of the previous year's service plan, and was approved by the Council's Licensing Committee on 10 June 2010.

3.1.6 *Recommendations*

There are no recommendations relating to "Organisation and Management".

3.2 Review and Update of Documented Policies and Procedures

3.2.1 Section 4 of The Standard requires Local Authorities to ensure that documented policies and procedures that are required to be set up, maintained and implemented under the succeeding sections of The Standard, e.g. authorisation of officers, interventions and inspections, database management, food inspection and sampling, etc. etc., are regularly reviewed and kept up to date.

3.2.2 These reviews are to be undertaken at regular intervals, and whenever there are changes to legislation or centrally issued guidance.

3.2.3 Under this section, the Agency wants to see that the Authority has produced the documented policies and procedures that are required under Sections 5 to 17 of The Standard, and has established a control system to ensure these documents are regularly reviewed and kept up to date.

3.2.4 From a very quick desktop review, Crawley has a comprehensive set of up-to-date documented policies and procedures that cover all of the activities that are within the scope of Section 4 of The Standard.

3.2.5 *Recommendations*

There are no recommendations relating to “Review and Update of Documented Policies and Procedures”.

3.3 Authorised Officers

- 3.3.1 Under this section, the Agency looks at the process and procedure for appointment of authorised officers, and the basic qualifications and ongoing professional development training of officers who have been appointed to undertake official controls for food safety and hygiene, and to undertake control activities under legislation made under, or having effect by virtue of, the 1972 European Communities Act. N.B. This includes officers who do not work in the “food team” but are nonetheless so authorised to act.
- 3.3.2 In particular the Agency looks at the Authority’s scheme of delegation to ensure there are no gaps in the Authority’s ability to take effective action under the full range of relevant food safety and hygiene legislation under the Food Safety and European Communities Acts (the Acts).
- 3.3.3 An important point to note is that, having regard to paragraph 1.2.2 of the Food Law Code of Practice, the Agency expects officers to be specifically authorised for certain legislation under the Acts.
- 3.3.4 Crawley has a documented “Procedure for the Authorisation of Staff and the Recording of Authorisations Issued” dated 3rd June 2010 which states that the Head of Planning and Environmental Services is responsible for signing officer authorisation letters in accordance with the documented procedure.
- 3.3.5 The Constitution of Crawley Borough Council gives delegated power to the Head of Planning and Environmental Services to authorise officers under the 1990 Food Safety Act, but at the time of the audit no similar delegation could be identified relating to the 1972 European Communities Act or Regulations made or having effect thereunder.
- 3.3.6 Officers had been issued with authorisation documents that set out the legislation under which they had been authorised to act, and the extent of their powers under the legislation.
- 3.3.7 Qualification records demonstrated that authorised officers are appropriately qualified for the range of duties they are authorised to perform, and training records showed that they are achieving more than the minimum 10 hours continuing professional development training required by the Food Law Code of Practice.
- 3.3.8 One small point to bear in mind is that CPD certificates should include evidence of the number of CPD hours that training events have provided. Some CPD certificates that had been issued by the Sussex Food Study Group for “Food Study Group Seminar - 5.5 hours” did not include any indication of the subject or content of the seminar. The Agency may query this on audit.
- 3.3.9 It was evident that officers have received training in a wide range of food safety and hygiene issues, including veterinary checks, imported food, meat, fish and shellfish inspection, vacuum and modified atmosphere packing, microbiological criteria, and HACCP, and legal procedures including PACE and RIPA.
- 3.3.10 Crawley has appointed an appropriately qualified and experienced lead officer with responsibility for food safety and hygiene matters as required by the Food Law Code of Practice.

3.3.11 *Recommendations*

Having regard to paragraph 1.2.2 of the Food Law Code of Practice, consider whether the Constitution enables officers to be authorised to take effective action under the full range of relevant food safety and hygiene legislation, including that made or having effect by virtue of the European Communities Act 1972; [The Standard – 5.1]

3.4 Food Premises Interventions and Inspections

- 3.4.1 This section of The Standard, dealing with food premises interventions and inspections, is designed to ensure that Local Authorities undertake official controls and other intervention activities on a risk-assessed basis, in accordance with legislative requirements and centrally issued guidance, and take appropriate action to secure compliance. There should be documented procedures covering the range of interventions used by each Local Authority, and officers' observations should be noted and stored.
- 3.4.2 In relation to approved establishments, the Agency expects to see a documented procedure that covers the application, pre-approval assessment, and approval process. The Agency checks that the file includes a properly completed application form, a record of a pre-approval assessment inspection, a report that indicates whether conditions are right for full or conditional approval, a report recommending the appropriate course of action if the officer conducting the assessment inspection is not the officer who signs the approval document, a copy of the approval document, and a notification of the conditional or full approval to the Agency. The Agency will also look for an extract from the scheme of delegation showing that the officer who signs approval documents has the delegated power to do so.
- 3.4.3 If conditional approval is granted then the Agency will also look to see that conditional approval was appropriate (i.e. there are no deficiencies in infrastructure requirements, including HACCP), and look to see that either full approval has been granted within 3 months following a further assessment inspection, or that an extension of conditional approval has been granted for a maximum of 3 additional months.
- 3.4.4 Crawley has a comprehensive set of documented policies and procedures covering interventions and follow-up actions, including a specific documented procedure for approval of establishments, all of which had recently been reviewed and updated at the time of the audit.
- 3.4.5 Files relating to two establishments that are subject to EC Regulation 852/2004, and five establishments that are also subject to EC Regulation 853/2004 were checked during the audit (see below for details – N.B. these details would not be included in an Agency audit report).
- 3.4.6 From a brief desktop review, intervention ratings appeared to have been appropriate, although some interventions had not been conducted at the correct frequency, having regard to the intervention-rating scheme in Annex 5 of the Food Law Code of Practice.
- 3.4.7 It was also noted that establishments that had been approved under the now superseded UK product-specific food hygiene Regulations had apparently not been re-assessed for compliance with EC Regulation 853/2004 and re-approved if appropriate in accordance with legislative requirements and centrally issued guidance at the time of the audit.
- 3.4.8 It was also noted that approval applications for some establishments requested approval for handling of meat, fish, dairy and egg products, and that approval documents had been issued for all four categories, although it appeared from the description of activities and operations at these establishments that not all four categories were appropriate.

3.4.9 The lists of approved establishments that the Agency publishes on its website include establishments YX 001, 002, 003, 004, 005, 006 and 007 (meat products), and XY 004 (fishery products). The Agency's lists do not correspond with the list of Crawley's currently approved establishments that was provided at the time of the audit.

3.4.10 *Recommendations*

Ensure that interventions are carried out at a frequency that is not less than that determined under the intervention-rating scheme set out in Annex 5 of the Food Law Code of Practice; [The Standard - 7.1]

Ensure that establishments that require to be approved under Regulation (EC) No.853/2004 are approved in accordance with relevant legislation, the Food Law Code of Practice, centrally issued guidance and local policies and procedures; [The Standard – 7.2]

Ensure that the Agency has up-to-date information of all currently approved establishments and of those that have ceased to be approved, and that its published lists of approved establishments in Crawley are accurate and up to date; [The Standard – 7.2]

Premises checked – files, intervention reports, letters, and records:

Pasta Reale (approved establishment XY 004)

Real Pie Company (approved establishment XY 005)

Jeanie Marshal Foods (approved establishment XY 007)

Alpha Flight Catering (approved establishment XY 002)

Gate Gourmet (approved establishment XY 003)

Favourite Chicken

Broadfield Butcher

3.5 Enforcement

- 3.5.1 Under this section, the Agency expects to see that an Authority has a documented enforcement policy that has been approved by Members or by an authorised senior officer according to local circumstances, has specific documented procedures for follow-up of interventions and for enforcement options, and for evidence that food law enforcement is being undertaken in accordance with legislative requirements, centrally issued guidance, the enforcement policy, and other local documented procedures.
- 3.5.2 The requirement for Local Authorities to document enforcement policies dates back to 1998 when the Cabinet Office published the Enforcement Concordat and invited Local Authorities to “sign-up” as part of the Better Regulation Initiative. Initiatives since 1998 have developed and strengthened the enforcement policy framework to the extent that all Local Authorities now have documented enforcement policies. This audit did not look at the enforcement policy itself, but did examine the scope and implementation of individual documented procedures for follow-up actions and enforcement options.
- 3.5.3 If voluntary procedures are used for surrender of food or closure of premises then the Agency will expect to see agreements that are properly documented and monitored, e.g. voluntary closure agreements in writing including specification of measures to be taken before reopening and signatures of the officer and the food business operator (FBO), records of monitoring to confirm closure, request in writing from the FBO for permission to reopen, and response from the Local Authority in writing to the reopening request.
- 3.5.4 It was evident that officers use a combination of formal and informal options to secure compliance, primarily by use of post-inspection reports and letters and service of hygiene improvement notices where necessary. One food business operator had been prosecuted in the two years prior to the audit.
- 3.5.5 From the information on file it appeared that decisions as to the appropriate enforcement option to use had been correct, and in accordance with the Food Law Code of Practice, centrally issued guidance, and Crawley’s own documented policies and procedures.
- 3.5.6 Records of five establishments where hygiene improvement notices had recently been served indicated that procedures and documentation met legislative requirements and centrally issued guidance, although it was noted that one food business operator had been served with two notices relating to exactly the same issues approximately one year apart.

3.5.7	<i>Recommendations</i>
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	There are no recommendations relating to “Enforcement”.
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3.6 Records and Inspection Reports

- 3.6.1 The Food Law Code of Practice requires records of inspections, audits and other interventions to be made on the relevant inspection form for the business concerned, examples of which are on the LACORS website. Local Authorities can devise their own forms, providing they include all the information that needs to be recorded, as set out in Article 9 of EC Regulation 882/2004 and paragraph 4.5.3 of the Food Law Code of Practice. The Agency will examine intervention records to check that these requirements are being met.
- 3.6.2 Annex 6 of the Food Law Code of Practice sets out the information that is to be provided to the FBO in the report of every intervention that is an audit, inspection, or partial inspection. The report should be provided in all cases, whether or not there are matters that the FBO needs to address. The Agency will look to see that such post-intervention reports are provided, either at the conclusion of the intervention, or within a reasonable time afterwards, and that they contain all the required information.
- 3.6.3 A number of inspection, audit and other intervention records were examined during the audit. Those relating to businesses subject only to Regulation 852/2004 had been fully completed, providing a comprehensive record of the business concerned, the type and scope of the intervention that had been carried out, and the details of any follow-up that had been undertaken.
- 3.6.4 It was evident that post-inspection reports and/or follow-up letters had been provided to the FBO, in all cases by means of a report that was left at the conclusion of the intervention, and in some cases as a follow-up letter by post a short time afterwards, including information required by Annex 6 of the Food Law Code of Practice.
- 3.6.5 However, in relation to businesses that are also subject to Regulation 853/2004, inspections had generally only been recorded on the form relating to Regulation 852/2004, without the supplementary relevant inspection form for the business concerned, which meant there was no evidence that specific requirements of Regulation 853/2004 had been considered.
- 3.6.6 During the course of the audit it was not possible to locate some essential records relating to approved establishments, including approval application forms, pre-approval assessments, and approval documents, and those approval documents that were located had been signed by an officer who did not appear to have the necessary delegated authority according to the Constitution.

3.6.7 *Recommendations*

Ensure that applications, pre-approval assessments, inspections, audits, and other interventions relating to establishments subject to approval under Regulation (EC) No. 853/2004 are fully and properly recorded in accordance with the Food Law Code of Practice and centrally issued guidance; [The

Standard – 16.1]

3.7 Internal Monitoring

- 3.7.1 Crawley has a number of documented procedures that relate to quantitative and qualitative monitoring of the food safety and hygiene official control service.
- 3.7.2 At the time of the audit there was evidence that monitoring was taking place, but it was evident that monitoring needs further development and fuller and more systematic implementation in order to be able to identify and act upon issues that have been identified during this audit.

3.7.3 *Recommendations*

Consider how to further develop and implement monitoring and verification procedures so as to ensure full conformance with The Standard, the Food Law Code of Practice, centrally issued guidance, and local documented policies and procedures; [The Standard – 15.2]