

Appendix A

DRAFT FOOD LAW ENFORCEMENT SERVICE PLAN 2007/2008

1. Service aims and objectives

1.1 Aims and Objectives

Within Brighton & Hove City Council the food service function is enforced by Environmental Health & Licensing and Trading Standards. Both sections come within the Public Safety Division of the Environment Directorate.

The Environmental Health & Licensing service is primarily concerned with protecting & improving public health & the environment across the City. Within this service, the Food Safety team works to ensure the safety of food prepared and sold, by inspecting food businesses, sampling food and investigating complaints. In addition the team aims to respond promptly to requests for advice from both businesses & members of the public. Wherever practicable links are formed with the business community and all relevant professional groups with the objective of increasing and promoting food safety awareness.

The overall objective of the service is to provide a comprehensive food safety service to consumers and the business community, with a considered balance between enforcement, investigation, advice and education.

The service is accredited to ISO 9001 and externally audited by the British Standards Institute.

The purpose of the Trading Standards service is to provide a comprehensive range of enforcement and advisory services to the community within a statutory framework. Its aim is to contribute, in conjunction with other agencies, to the development of a safe, fair and equitable trading environment for all consumers, by means of advice, information, education and enforcement.

In respect of food standards the aims are to: -

- Ensure accurate and informative labelling of food in accordance with Food Safety legislation.
- Ensure that the composition of food complies with Food Safety legislation.

The objectives being: -

- To carry out Food Standards Inspections in accordance with Local Authorities Co-ordinators of Regulatory Services (LACORS) risk assessment guidelines.
- To undertake an effective food screen testing and sampling programme to check composition and labelling.

- To respond to Food Standards Complaints made by members of the public and take appropriate and proportionate action on such matters.
- To respond to local trader and Home Authority enquiries about Food Safety matters and offer accurate advice.
- To respond to Food Hazard warnings in an appropriate manner.

1.2 Links to corporate priorities and plans

The City Council's corporate plan has four priorities for 2006–2007:

- develop a prosperous and sustainable economy;
- develop a safe city that values our unique environment;
- develop a healthy city that cares for vulnerable people and tackles deprivation and injustice;
- ensure all our children and young people have the best possible start in life.

The food enforcement service has strong links in with three of these priorities. The service objective to provide advice and enforce relevant standards in the food industry is key to developing and sustaining the local economy in a major South coast tourist, leisure and conference destination. In turn the production of safe high quality food plays an important part in improving the quality of life for visitors and residents of the city.

The food service assists the care for vulnerable people by links with:

- Children's and Young Person's Trust. The Trust brings together education, health and social care for all those 0 to 19 years old in Brighton & Hove. The food service links with this by having an influence on the provision of good quality safe food in the schools and other institutions operated by the Council.
- Housing & City Support Directorate. This Directorate is responsible for caring for vulnerable people by providing support, services and partnerships with external agencies. The food service has links with these services and agencies to ensure the standards and safety of the food supplied and provided. In addition the service has strong links with the Commission for Social Care Inspection who enforce standards at care homes in the City.

During 2007 a new Corporate Plan to guide the work of the Council through to 2011 is due to be published. This will influence future food service plans.

The Food Service Plan is part of the corporate annual planning and development process and may be incorporated in the Authority's Corporate Best Value Performance Plan.

2. Background

2.1 Profile of the Local Authority

Brighton & Hove is a unitary Authority on the South coast of England. It is approximately 50 miles from London. Bounded by the English Channel to the South and the South Downs to the North, it covers an eight-mile stretch of seafront and extends inland for approximately five miles.

Key Statistics from the 2001 Census:

Estimated resident population 1991	243,881*
Resident Population 2001	247,817
Number of households	114,479
Average household size	2.09
Area (hectares)	8,267
Density (residents/hectare)	30 per ha

Ethnicity

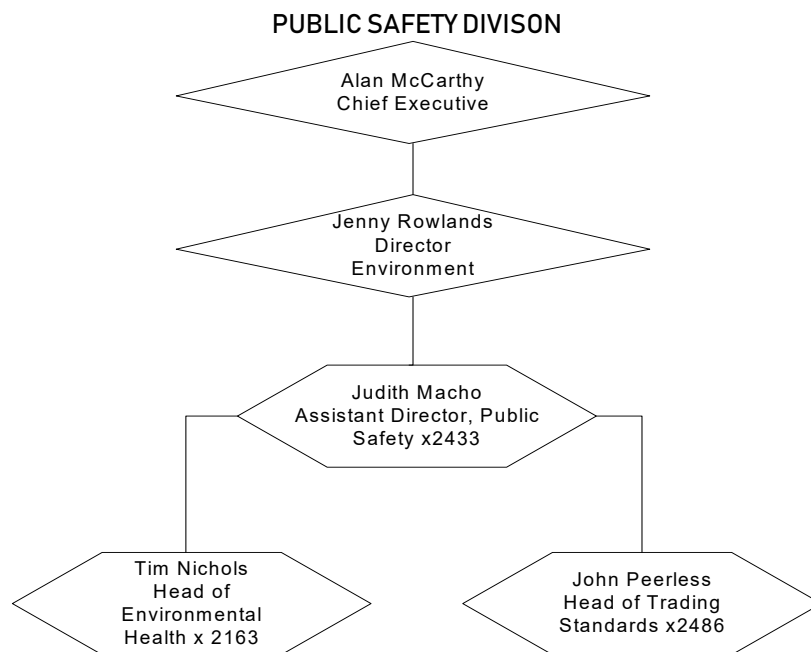
White	94.2%
Mixed	1.9%
Asian or Asian British	1.8%
Black or Black British	0.76%
Chinese	0.53%
Other	0.65%
Total non-white	5.8%

Eight million people visit Brighton & Hove each year. The value of tourism to the economy is estimated at £388million per annum supporting 13,000 jobs. The city boasts 4293 bedrooms, offering a bed stock of approximately 10000. There are no major food manufacturers in the area, but there are a large variety of hotels, many food retailers, and over 400 restaurants serving cuisine from around the world. The night time economy is a significant feature of the city's profile.

2.2 Organisational Structure

The Environmental Health & Licensing and Trading Standards sections come within the Public Safety Division of the Environment Directorate. The Division reports to the Environment Committee. Relevant structure charts being:

COMMITTEE STRUCTURE



The Head of Trading Standards is responsible for the food standards function. In conjunction with the food officers an Inspection and sampling programme is established to ensure that specific targets are met or areas of concern are identified and/or addressed.

A formal arrangement is in place with the Sussex and Surrey Environmental Microbiology Services based at the Princess Royal Hospital, Haywards Heath for the analysis of samples that require microbiological examination.

Hampshire Scientific Services are engaged as a Public Analyst for the purpose of formal and informal examination of samples. There is a specific contract of approximately £14,700 that covers sampling analysis and consultancy costs. The scope of work is limited to composition and labelling, plus chemical contamination. Management and monitoring of the contract is the responsibility of the Head of Trading Standards.

The entomologist from a local natural history museum assists with insect identification.

2.3 Scope of the Food Service

A specialist Food Safety team within Environmental Health carries out the food safety function. The work of the team includes the following:-

- Inspecting food premises
- the investigation of food safety complaints
- food poisoning investigations when linked to a premises
- microbiological food sampling
- food safety training
- responding to requests for advice
- initiatives relating to working with the community and businesses.
- Taking appropriate steps to publicise and act upon national food alerts.

The food standards function is carried out by Trading Standards Officers in the Inspection & Sampling Team. The work of the team includes the following: -

- An inspection programme
- The investigation of food standards complaints
- Sampling
- Responding to requests from businesses
- Initiatives relating to working with the community and businesses
- Taking appropriate steps to publicise and act upon national food alerts

Food Standards work is undertaken in conjunction with work on other areas of Trading Standards law. For instance, a programmed food visit will also include giving advice about other matters such as prices, business names and weights and measures. In this way a comprehensive visit is undertaken so as to minimise any inconvenience caused to the general day-to-day running of the business.

Trading Standards are responsible for enforcing relevant legislation in respect of imported feedstuff, whilst Environmental Health & Licensing enforce relevant legislation controlling imported food of non-animal origin and products of animal origin.

2.4 Demands on the Food service

Food Safety

As at February 2007 there were 2788 food businesses registered with the Council. These premises are broken down in the following profile:

3	Primary Producers
21	Manufacturer/Processor
2	Importers/Exporters
37	Distributors/Transporters
614	Retailers
2032	Restaurants and other Caterers
79	Manufacturers mainly selling by retail

2788 TOTAL

Two food businesses are approved under Regulation (EC) 853/2004 for specific dairy and meat products processing. Another two processors are due to be converted from the previous approval regime under fish and dairy products legislation.

The nature of the City causes a considerable seasonal variation in the department's workload. Some businesses only open during spring and summer the inspection programme has to be tailored to meet these service needs. There is a dramatic increase in the number of visitors in the spring and summer this increases the volume of requests for service, enquiries and other reactive work. Outdoor events such as music events, festivals, markets such as French markets, farmers markets, open-air concerts and funfairs also add to the seasonality of the workload.

In the past two years there has been a significant increase in the turnover of food businesses. The number of businesses ceased trading in 2005/2006 increased by 100% on the year before whilst the number of businesses start ups or where the ownership had changed increased by 150% on the 2004/2005 number. The rate of change has been maintained at the higher level. The current estimate of the number of business that will cease trading in 2006/2007 is 450 and the number of new businesses registered is believed to be 385

Food Standards

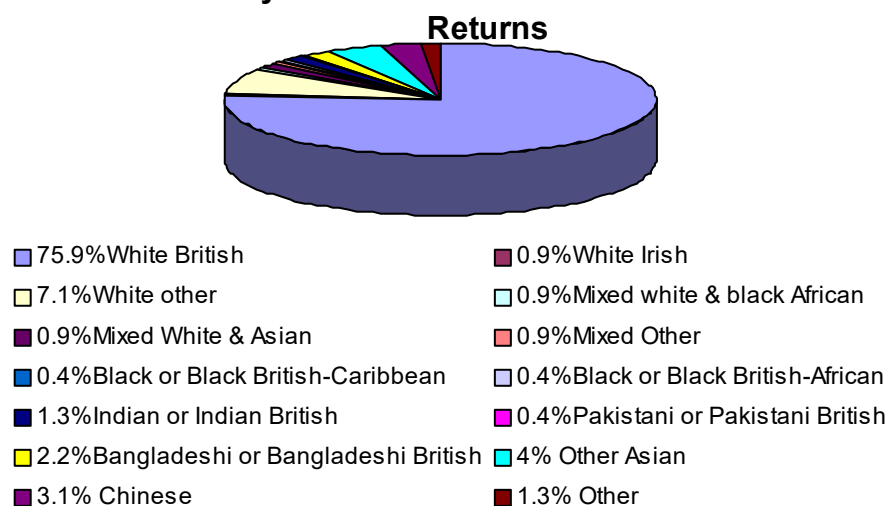
Migration to the Uniform database has been completed and during 2005-6 resources were put to a data clean up exercise. The move to Uniform means that the premises profile is the same but may have a different inspection frequency for Food Standards. As of the 1st January 2007 2230 premises were considered to have an inspectable risk for Food Standards work.

There are 2 registered feeding stuffs premises.

Access to services

Demographic information is requested as part of a post inspection survey. The returns for the last full year, 2005/2006, gave an ethnic demographic breakdown as below:

Ethnicity of Food Businesses from 2005/2006



In addition to having a number of key food safety advice leaflets in a variety of languages the service has the capacity to have any leaflet, letter or other document translated as required. Wherever possible, opportunities are taken to provide information about services to ethnic communities. Food safety training courses offered in languages other than English including Bengali, Cantonese, Thai and Turkish have proven to be successful and popular with traders.

Service users are able to access the service by visiting either of the two City Direct Advice Centres situated in central Brighton, open between 9am and 4:30pm Monday to Friday and central Hove, opening hours 8:45am to 4:30pm on weekdays. Remote access to Council services is facilitated through 'self-help' in 25 locations across the city including all the main Council offices, libraries, leisure centres and some schools. General telephone calls are fielded via a Call Contact Centre on (01273) 292161. Advice can also be accessed via the Council's web site, brighton-hove.gov.uk, or by email to ehl.food@brighton-hove.gov.uk.

All calls for Consumer Advice are dealt with by Consumer Direct South East. There is a referral protocol with them regarding food issues. All food related enquiries are referred to Trading Standards within 24 hours.

The Food Safety team operate a Food Safety Hotline where businesses and consumers can obtain immediate advice from a food safety officer, during office hours. Senior food competent Environmental Health staff provide cover for an out of hours service to respond to food safety emergencies and incidents.

2.5 Enforcement policy

The Department has a documented Commercial Enforcement Policy. This policy has been developed in line with the Cabinet Office's Enforcement Concordat, The Code for Crown Prosecutors, Statutory Codes of practice and relevant guidance documents and guidelines issued by Central Government Departments and co-ordinating bodies. The Enforcement Policy is posted on the Council's website. Any breaches of food law detected in premises where Brighton & Hove City Council has an interest either as proprietor or responsibility for structural repair are brought to the attention of the Chief Executive without delay.

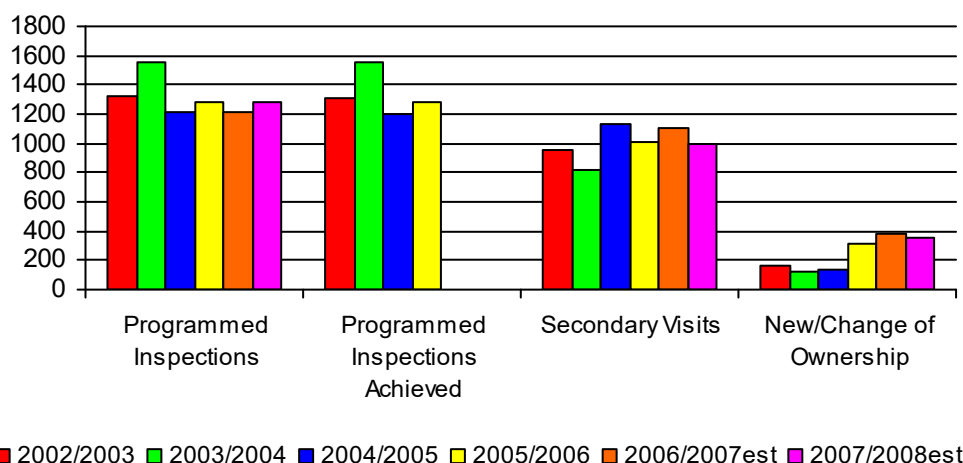
3 Service delivery

3.1 Food Premises Inspections

Food Safety

The level of achievement in food safety inspection based activity over the past four years is shown in the chart below along with an estimate for completion of the current year 2006/2007 and 2007/2008. Further details of the source data can be found in the relevant part of the plan.

Chart of Inspection Based Activity



See tables 3.3.1 and 3.3.3 for further details.

It is the continued aim of Brighton & Hove City Council to undertake 98 % of all programmed food safety inspections in accordance with the Food Safety Act Codes of Practice. Table 3.3.1 gives details of performance against this target since 2002 and estimations for the years 2006/2007 and 2007/2008. The target is set at 98 % to take account of possible service or operational problems such as a turnover of staff at the end of the year, emergencies or difficulties contacting seasonal or home caterers

Year	02/03	03/04	04/05	05/06	06/07est	07/08est
Programmed Inspections	1316	1556	1209	1283	1208	1286
Achieved	1313	1554	1205	1282		
Target %	98	98	98 Cat A-D	98 Cat A-D	98Cat A-D	98Cat A-D
Achieved%	99.8	99.9	99.7cat A-D	99.9cat A-D		

Table 3.3.1 Achievement of Planned Food Safety Inspection Programme 2002-2008.

In line with the Food Safety Code of Practice published by the Food Standards Agency in 2004 the Food Safety inspection programme was reviewed and refocused. An alternative enforcement strategy was included in the 2004/2005 Food Law Enforcement Service Plan for maintaining surveillance of the low risk category premises. Introduction of this strategy enables the service to provide greater focus on the higher risk food, category A to D, premises.

A documented strategy for this alternative is in place. The strategy employs postal questionnaires, sample inspections to check the validity of the information gained and follow up inspections where either the information returned leads the Authority to the conclusion that an inspection is necessary or no information is returned. Table 3.3.2 below shows the number of premises dealt with by this alternative method since 2004.

Year	04/05	05/06	06/07est	07/08est
Number of premises	119	107	114	186

Table 3.3.2. Number of Premises dealt with under alternative strategy.

The planned number of primary food safety inspections for the year 2007/2008 are as detailed below:

Risk Category of Premises	Number of Inspections Due
A	22
B	197
C	811
D	256
Total	1286
Low risk premises to be dealt with Under alternative strategy	186

It is the intention of the service to inspect at least 98% of the 1286 high-risk (A – D) premises due for inspection during the year as above. The four product specific premises will require one primary inspection each; three require one secondary visit whilst one requires two secondary visits.

In addition to primary food safety inspections officers also undertake:

i. Secondary Inspections

The main purpose of secondary inspections is to monitor food business that fail to comply with significant statutory food hygiene requirements, or where directly required by Regulation. Failure could include:

- Failure to comply with a single requirement that compromises food safety, public health or prejudices consumers;
- Failure to comply with a number of requirements that, taken together, indicate ineffective management; or
- Service of a hygiene emergency prohibition notice or order.

When considering both the need for and timing of a secondary inspection consideration is given to the seriousness of any failing, history of the business, confidence in management and the likely effectiveness of this action when compared to any other enforcement option.

Secondary inspections are categorised as those that are not primary inspections but include:

- Additional inspections of establishments that are subject to product specific food hygiene Regulations;
- Sampling Visits;
- Visits to check on the progress of measures required after a previous inspection;
- Visits to investigate food and food premises complaints;
- Visits to discuss implementation of Hazard Analysis of Critical Control Points based system;
- Visits involving training of food handlers;
- Inspections of premises to assess a licence;

ii. Inspections of New Businesses/Change of Ownership

Where the service becomes aware that ownership of a food business has changed or a new business has commenced it aims to undertake an inspection within 28 days of the business starting trading. This is in line with the aim to carry out programmed food safety inspections within 28 days of the date due. During 2006/2007 61% of inspections met this aim.

iii. Monitoring of Vacant Premises

Where food premises fall vacant arrangements are made to monitor activity at the premises. When new businesses open it is important that support and guidance on food safety issues are given at an early stage.

Year	02/03	03/04	04/05	05/06	06/07est	07/08est
Secondary inspections	951	825	1127	1013	1100	1000
New Premises or Change in Ownership	157	119	131	317	385	350

Table 3.3.3 Estimate of for 2007/2008 based on data since 2002.

The estimation of the number of staff required to carry out the programme of inspections plus other visits as estimated above is 8 full time equivalents. Resources required to undertake secondary visits generated by complaints, enquiries or to undertake sampling are included in the appropriate part of this plan.

Food Standards

Premises have been risk assessed using the LACORS system. The inspection programme requires high-risk premises to be visited each year, medium risk every two years and low risk every five years. This means that 44 high risk, 344 medium risk and 298 low risk premises should be visited each year.

The target for 2007-8 is to visit

100% High 40% of those medium risk premises liable to inspection

There is no commitment to visit low risk premises.

Approximately 5% of inspections require a follow-up visit. Officers do not work exclusively on the food function. Three Trading Standards Officers make up the food team. They are all part time basis and their time is equivalent to 1.37 FTE. About 50% of their time is spent on the food function.

All the officers have the required competence to perform food standards inspections.

3.2 Food complaints

Food Safety

It is the policy of this Authority to respond promptly to all requests for advice from business. It is the target of the service to respond to 90% of planning application consultations within 10 days, all other demand driven work within 5 days.

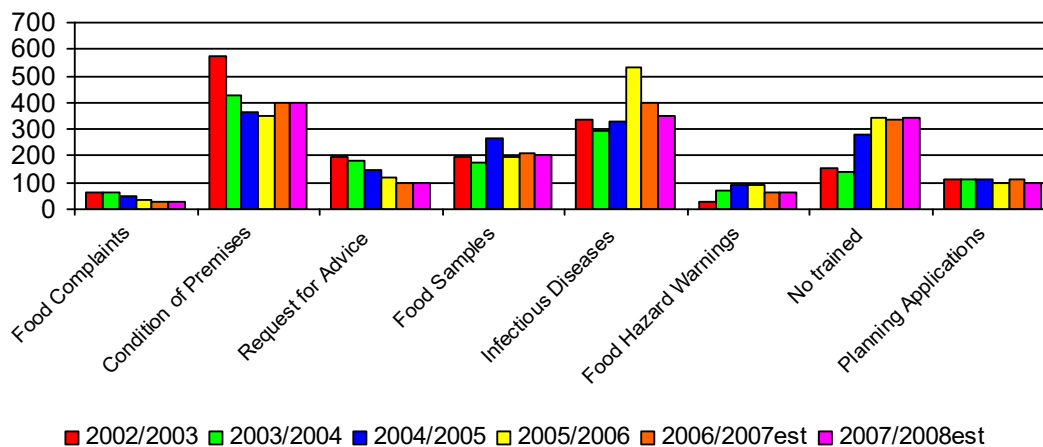
Year	02/03	03/04	04/05	05/06	06/07est
Within target %	97.5	97	95.4	97	96.5

Table 3 Percentage of Demand Driven Work within Target

All food complaints received are investigated in accordance with the Council's Enforcement Policy and documented procedures. See below for a chart showing the pattern of demand driven work since April 2002 and estimates for

the years 2006/2007 and 2007/2008. The source figures for this chart are contained in tables within the relevant part of the plan.

Chart of Demand Driven Work



See tables 3.2, 3.4.1, 3.4.3, 3.6, 3.7 and 3.9 for the source of data.

Year	02/03	03/04	04/05	05/06	06/07est	07/08est
Food	61	66	51	35	25	25
Condition of Premises	575	425	361	348	400	400

Table 3.2 Estimate of Number of complaints 2006/2007 and 2007/2008 based on data from 2002 onwards.

It is estimated that 1.5 Full Time Equivalent officers will be required to meet this level of complaints.

Food Standards

It is the policy of this Authority to respond promptly to all food complaints and to carry out enquiries in accordance with the complaints' procedure.

Level of Complaints:					
2001	2002	2003	2004	2005	2006
67	67	79	64	170	183

3.3 Home Authority Principle

Brighton & Hove Council fully supports the LACORS Home Authority principle. There are six formal Home Authority agreements and 18 informal arrangements.

3.4 Advice to Business

Food Safety

See below for total number of requests for advice on food safety issues made by members of the public and those wishing to set up a food, food traders along with the number of planning applications viewed for food safety reasons.

Year	02/03	03/04	04/05	05/06	06/07est	07/08est
No of Requests	194	181	144	121	100	100
Planning Apps	115	113	120	98	115	100

Table3.4.1 Showing number of requests received since 2002 and estimates for 2006/2007 and 2007/2008

It is estimated that 0.5 officers Full Time Equivalent are required to meet this estimated demand.

The Authority is committed to good liaison arrangements with proprietors of food businesses, to encourage effective two-way communication and to provide information and training on legislation and good practice.

A Food & Safety newsletter is produced twice a year, which informs proprietors of new legislation, advice on good practice, and general items of interest. This is widely distributed throughout the city and sent out with inspection reports. Information and advice is also posted on the Council's web site.

The food safety training project funded by the Food Standards Agency to assist food businesses to comply with new legislative requirements introduced in January 2006 has continued through the year. In January 2007 another £15,000 was granted on top of the £117,259-12 all ready allocated to provide assistance for businesses across Adur, Worthing, Brighton and Hove. The project is on course to exceed the target of coaching 660 businesses across the three local authorities. The leading nationally recognised specialist contactors has provided expertise to deliver the training and coaching part of the project.

Food Standards

Requests by businesses for advice are recorded as Service Requests. The level of Service requests received by the Authority on food matters is steadily increasing year on year.

Level of Service Requests

2001	2002	2003	2004	2005	2006
1	14	24	30	28	32

▪ **Food Inspection and Sampling**

Food Safety

The service participates in sampling initiative organised by LACORS, the Chartered Institute of Environmental Health (CIEH) Sussex Food Liaison Group, local Health Protection Agency (HPA) and those instigated by the Food Standards Agency. The sampling programme includes food or food contact surfaces at approved premises, food manufacturers, and manufacturers selling mainly by retail as well as caterers and retailers. Samples of foods and food contact surfaces are also taken as part of routine work and when investigating specific issues at food premises.

Sampling programmes carried out during 2006/2007 included taking part in two LACORS studies: Identification of *Listeria Monocytogenes* in pre-packed food from retailers and a hygiene study of mobile food vendors. Local studies to ascertain safety of sauces from hot food takeaways and a survey of soft ice cream were also undertaken. Where unsatisfactory results are obtained corrective action is put in place to improve standards and further samples are taken as a check.

Possible sampling surveys for 2007/2008 includes taking part in LACORS studies. Probable surveys to include sampling salads from fast food premises to monitor for cross contamination issues, edible seeds and fresh herbs for contamination and local county wide studies details yet to be finalised.

An Environmental Health Officer within the Food Safety team is responsible for organising and co-ordinating food safety sampling, it is estimated 0.5 Full Time Equivalent officer will be required for this service.

Year	02/03	03/04	04/05	05/06	06/07est	07/08est
No samples	199	177	264	194	210	200

Table 3.4.3 Number of Food Safety Samples Submitted for Analysis 2002-2005 & Estimate for 2006/2007, 2007/2008.

Arrangements are in place with the local Health Protection Agency laboratory for the analysis of samples that require microbiological examination. The allotted cost for sampling financial year 2006/2007 was £10,675. £5,516.50 of this allocation had been taken up to the end of January 2007.

As at the beginning of February 2007 the allocation for the year 2007/2008 had not been confirmed. Advice from the laboratory is that the allocation will be similar to that of 2006/2007.

Food standards

Food standards work is performed during a comprehensive inspection of the premises and specifically linked to the metrology function. One part time Fair Trading Officer and two part time retired Trading Standards Officers undertake the food standards programme and deal with enquiries from consumers and businesses. The percentage of Officer time devoted to these functions has

already been described earlier in this document. A Fair Trading Officer qualified in September 2006 and completed the lead assessor course November the same year. The food standards function equates to approximately 0.625 FTE.

There is a budget of £11,000 to facilitate a contract with Hampshire Scientific Services for the purposes of analysis. A sampling programme is initiated each year that reflects perceived or identified problem areas, regional food panel projects, changes in legislation and partnership arrangements. Sampling is undertaken in accordance with documented procedures and in accordance with the Codes of Conduct produced under the provisions of the Food Safety Act. A further £2,300 is allocated for sample purchases.

Food Sampling Plan 2007/2008

MONTH	PROJECT
TBC	Nutritional Tolerances (Regional activity)
TBC	Salt - when eating out (Regional activity)
TBC	Misleading Pictorial labelling (Regional activity)
TBC	Vitamin Supplements (Regional activity)
TBC	Misleading Allergy labelling (Local activity)
Year long	Spirits Sampling as a part of the inspection programme
Year long	Home Authority Sampling as part of the inspection programme + occasional samples taken during the procurement of above samples by

The total planned cost for the sampling programme is below the total budget for food sampling leaving leeway for complaint samples and reactive officer sampling.

3.5 Control and Investigation of Outbreaks and Food Related Infectious Disease

Specific infectious diseases are notifiable to the local authority. The department investigates these cases in an attempt to identify the cause of illness and any practical measures to control potential outbreaks. See below for the number of cases investigated from 2002 to 2006 and an estimate of the numbers expected for the current year and 2007/2008. Officers of the Health Safety & Licensing team investigate the notifications in the first instance linking in with the Food Safety team where it is suspected that the illness is foodborne. The investigation must commence within 24 hours of the notification date. In individual notifications the investigation has to commence within 5 days. It is estimated that 1 FTE officer will be required to meet this level of complaints. Resources contained within the Health, Safety & Licensing team.

Year	02/03	03/04	04/05	05/06	06/07 est	07/08est
No of reports	338	292	328	529	400	350

Table 3.6 Estimate of Number of notifications for 2006/2007 & 2007/2008 based on data from 2002 onwards

The number of notifications included in table 3.6 have been corrected to discount those illnesses not associated with food such as mumps and measles. The number of notifications received linked to food poisoning bacteria have been generally falling. The increase seen in 2005/2006 was due to a large number of illnesses with no final diagnosis and a local *Cryptosporidium* outbreak. During 2006/2007 there was a significant outbreak of *E. Coli 0157* which caused 5 adults and 12 children to become ill, two of the children were so ill that they had to be admitted into hospital. Table 3.6.1 below shows the number of *Campylobacter* and *Salmonella* cases notified from 2003 onwards. The number of *Campylobacter* confirmed notifications have been steadily reducing whilst the number of *Salmonella* cases rose this year due to a local outbreak of *Salmonella*. The Food Standards Agency has made the reduction in incidents of these two food poisoning bacteria a core aim nationally.

Year	03/04	04/05	05/06	06/07 est	07/08est
Campylobacter	147	104	90	40	30
Salmonella	56	72	39	60	40

Table 3.6.1 Estimate of Number of specific notifications for 2006/2007 & 2007/2008

3.6 Food Safety Incidents

The out of hours emergency service is staffed by senior staff who are suitably authorised to carry out the full range of food safety functions including responding to food safety incidents.

Information regarding food safety alerts from the Food Standards Agency is received during office hours via an email system. The Divisional Environmental Health Officer – Food Safety and senior staff within the food safety team are registered on the Food Standards Agency rapid alert system and receive national food alerts through a text message scheme direct to their mobile phones. The information contained in the food incidents is distributed and acted on as deemed necessary.

Year	02/03	03/04	04/05	05/06	06/07est	07/08est
Food Alerts	31	69	94	92	60	60

Table 3.7 Estimate of Food Hazard Warnings for 2006/2007 & 2007/2008 based on data from 2002 onwards.

The increased number of alerts through 2004/2005 and 2005/2006 were due to incidents associated with Sudan dye in a variety of foodstuffs. It is anticipated that this level of service can be absorbed as part of the reactive work staffing estimate.

3.7 Liaison with Other Organisations

Food Safety

There are a number of arrangements in place with other professions and local authorities to promote consistency:-

- The Divisional Environmental Health Officer attends the Sussex Food Liaison Group, where common approaches to food safety legislation,

promotion of best practice and training needs across the whole County are discussed and agreed.

- Senior Environmental Health Officer in the Food Safety team represents the service at the Chartered Institute of Environmental Health Sussex Food Study Group. This group discusses common food safety delivery problems and develops joint procedures and practices to food safety issues.
- The Food Safety team has regular liaison meetings and agreed working arrangements with Educational Services and catering contract supervisors to ensure consistent enforcement within schools. This year the Food Safety team has been actively involved in advising Educational Services on the monitoring of the new catering contract, and any problems or queries that have arisen.
- Officers represent the service on the Schools Food Action Group to develop, support and facilitate multi-agency healthy eating initiatives in schools. This fits in with the Government requirement to include cooking skills in the curriculum.
- An officer from the Food Safety team has attended Social Services liaison meetings to promote good working relationships and consistent enforcement within care homes for older people and also children's homes. Despite the changes in inspection arrangements of care homes and under 5's accommodation, liaison on individual cases has continued.
- Officers have liaised with the Corporate Health & Safety Division to develop a Food Safety Management System for the Council.
- The Divisional Environmental Health Officer - Food Safety acts as liaison between Commission for Social Care Inspection and Environmental Health departments across the county to provide food safety advice and agreeing a joint protocol in respect of enforcement of standards within residential care homes.
- An officer from Environmental Health & Licensing attends the District Control of Infection Committee co-ordinated by the Community Consultant in Disease Control which reviews procedures and agrees communicable disease outbreak and food poisoning control measures.
- The Head of Environmental Health advises the Brighton & Hove Food Partnership. The partnership includes representatives from local business and community groups, community workers and members of the Sustainability Commission. The partnership raises awareness of food producers in supporting health, the economy and the environment increasing access to nutritious, safe affordable food and providing a network for information exchange.
- The Food Safety team have worked closely with the City College, Sussex Interpreting Services and small business groups to deliver the training and coaching outlined in 3.4 above.
- A liaison arrangement is in place with Sussex Career Services and local schools to enable teachers and students from Brighton & Hove to come into the department and gain work experience.

- This Authority participates in a variety of Best Value benchmarking exercises in conjunction with other Councils, and the Sussex Chief Officers group including the East Sussex Inter Authority Agency Audit.

This work is accounted for in the reactive work estimate of resources required.

Food Standards

The Trading Standards Authorities in the South East (TSSE) have a food panel that identifies and organises projects on specific food topics. They also share good practice and consider problem areas that have been referred by member Authorities. Hampshire Trading Standards lead on this and are the regions link to LACORS on food issues. Details are still to be agreed but at least 4 projects will be implemented during 2007/2008.

Trading Standards participate in three benchmarking groups, The Southeast Trading Standards Authorities, the Unitary Cities and the Southern Unitary Authorities. Food Standards is not currently the subject of the benchmarking.

A programme of inter authority auditing is being undertaken by the TSSE Authorities. This includes Food Standards matters and an audit of the Service in Brighton and Hove will be undertaken by East Sussex in 2007.

3.8 Food Safety Promotion

The service organises a number of food hygiene training courses per year.

Food Safety Training Activity 2006/2007

Type of Course	No of Courses	Delegates
CIEH Foundation Certificate in Food Hygiene (now CIEH Level 2 Award in Food Safety in Catering CIEH Module A Certificate)	22 5	290 47
TOTAL	27	337

Year	2002/2003	2003/2004	2004/2005	2005/2006	2006/07est	2007/08est
No Trained	143	279	250	341	337	340

Table 3.9 Total Training Undertaken Since 2002

The service has been active in offering support as part of the 'Safer Food Better Business' project. Training has also been organised in Cantonese, Bengali, Thai and Turkish to assist food businesses where English is not the first language. The project is seen as a major benefit to the food businesses within the City, see 3.4 above and 6.2 for further details.

Nine 'CIEH Level 2 Awards in Food Safety in Catering' and five 'CIEH Food Hygiene Option Module A' courses have already been scheduled for 2007/2008.

The service is now in a position to offer the new qualification 'CIEH Level 3 Award in Implementing Food Safety Management Procedures' designed specifically to assist food businesses to comply with requirements introduced in 2006. Investigations are also being made to offer the 'Safer Food Better Business' training on a pay basis.

Staff from the food safety team work closely with the Brighton & Hove Primary Care Trust to encourage the promotion of healthy eating options by food businesses. The Authority has been involved in raising awareness of food safety in schools by promoting and organising a food safety school poster competition as part of National Food Safety Week.

Officers of the food safety team have given hygiene training sessions at a number of schools, and taken part in the week long 'Safety in Action' promotion event. The team have also taken part in multi agency training workshops for small guest houses.

Two Food and Safety newsletters are produced per year. The newsletters carry articles and information for businesses and members of the public. A copy is posted on the web site and sent out with correspondence.

For the past three years the Food Safety team have been invited to have an information stand at the Chinese New Year celebration event at Hove Town Hall.

It is estimated that 0.25 Full Time Equivalent Officer will be required to continue such food safety promotion work.

4. Resources

4.1 Financial Allocation

Food Safety

The projected budget for providing the food safety service within Environmental Health is detailed below. The staffing figures include a figure to cover the appropriate proportion of the Head of Environmental Health and Administrative support and management time: -

	Food	Infectious Diseases
Staffing	543860	38890
Transport	12630	1070
Supplies & Services	14280	1400
	<u>570770</u>	<u>41360</u>

These figures are provisional as the time of preparing this Service Plan the 2007/08 budget has not been formally agreed yet. With that in mind:

Food Standards

It is difficult to detail the time spent on the food standards function as it is carried out during a comprehensive inspection. Time monitoring is not currently used to apportion time to the food function. It is estimated that the resources are allocated as follows:

Inspection, complaints and advice

Staffing

Management

£ 2810

Food Team

£ 24260

Total

£ 27070

Sampling

Purchases

£ 2300

Supplies

£14700

Total

£17000

Total

£44070

4.2 Staffing Allocation

Food Safety

Establishment of the Food Safety team for the year 2007/2008 is 10.8 full time equivalent field officers plus two full time equivalent administrative Technical Support Officers and management, broken down as follows:

1 x Divisional Environmental Health Officer

0.5 management of team 0.5 fieldwork

2 x Senior Environmental Health Officers

5.8 x Environmental Health Officers

2 x Senior Technical Officers

Officers and external contractors have to comply with strict guidelines governing qualifications and competencies before they are permitted to undertake food safety duties. The Senior Technical Officers hold Higher Certificates in Food Premises Inspections and are able to inspect all risk category of food businesses. All Environmental Health Officers are qualified to undertake inspections of all risk category of food businesses.

During 2006/2007 one of the Environmental Health Officers took extended leave for the majority of the year. The duties of that officer was backfilled by a mixture of cover from the rest of the team, employment of temporary staff and overtime.

10 officers within the other Environmental Health & Licensing teams, retain competencies to undertake food safety inspections. All food competent officers must undergo a minimum of 10 hours food safety training per year to retain their authorisation to undertake food safety inspections.

Food Standards

The Inspection and Sampling team is responsible for Food Standards Inspection. The proportion of time allocated to this function is estimated as follows

Support	0.05
Management	0.05
Food Staff	0.625
Total	0.635 FTE

4.3 Staff development Plan

The Authority has a structured appraisal and development system. During staff appraisals individual training needs and any gaps in competence are identified. The information is used to produce individual training and development plans for each officer for the coming year. Brighton & Hove City Council is continuing to work towards obtaining Investors in People accreditation.

The Food Safety team also have team meeting every eight weeks Any training needs of the service as a whole are identified and discussed at these meetings.

Through this system the service ensures that all food competent officers receive sufficient good quality focused food safety training to comply with relevant codes of practice and professional memberships schemes.

5.0 Quality assessment

5.1 Quality assessment

Food Safety

The service has a documented procedure relating to the food safety/food hygiene duties. This includes internal auditing and customer feedback. The service actively seeks the views of businesses by enclosing post inspection questionnaires with reports sent following inspections. In the year 2005/2006 the key findings of this survey were:

- 98% of respondents were either very satisfied or satisfied that Brighton & Hove City Council had done all that it could to help deal with their premises inspection.
- 99% of respondents understood the purpose of the visit to their premises.
- 98% found the information given to them by the visiting officer easy or very easy to understand.

Food Standards

Quality procedures have been developed and are being implemented. Cross-auditing by another independent Trading Standards Service was postponed in 2005 because the lead officer resigned from their position.

6. Resources

6.1 Review against the service plan.

Food Safety

In addition to the quality checks explained in 5.1, past performance is reviewed against the service plan by comparing the number of inspections achieved against the number programmed. Monthly statistical reports are produced so that performance can be closely monitored throughout the year, and any problem areas promptly identified and resolved through management reviews, team meetings and monthly one to one's between field staff and their line manager.

In the year 2005/2006 99.9% of the programmed food safety inspections were carried out. In addition 317 inspections were undertaken of new premises or premises that had changed ownership. Last years service plan predicted that a total of 1595 food safety inspections would take place in 2006/2007. The last estimate made at the beginning of February predicted a renewed total of 1569.

The level of enforcement has been maintained in 2006/2007 with 7 successful prosecutions, 3 simple cautions being issued. The prosecutions attracted total fines of £28,600 and costs of £5,766.

It is estimated that in 2007/2008, 1610 primary food safety inspections will be undertaken this will include at least 98% of the food safety inspection programme and an estimate of 350 inspections of new premises or premises where the ownership has changed.

Charts in section 3 give a detailed break down of service activity to from April 2002 to March 2006 and an estimation of the activity for the remainder of the current and coming year.

Food Standards

Performance is reviewed against the service plan by comparing the number of inspections carried out against the number to be done.

The LACORS risk assessment was completed this year. The initial assessment identified 22 High Risk premises and 416 medium risk premises that formed the planned inspection programme. The number of high risk premises increased to 44 and the medium risk premises to 693 because of new premises and the risk assessment of premises not previously risk assessed. It is anticipated that the planned inspection programme will be completed.

During staff 1:1's, each officer's performance is monitored, to identify good performance and any areas of improvement.

Food complaints are dealt with within prescribed response times. Each complaint should receive a response within 5 working days. Over 95% of complaints are responded to within these prescribed time limits. Food complaints have remained static for the last three years. The majority of complaints are dealt with by advice.

6.2 Identification of any variation from the Service Plan

Food Safety

A number of variations from the 2006/2007 service plan have occurred.

- The service plan estimated that there would be 1298 programmed food safety inspections to undertake. Due to the larger than expected turnover of food businesses this is now predicted to be 1208.
- The plan also estimated that 200 inspections of new premises or premises where there has been a change of ownership would be required. Again due to the higher than expected turnover of food businesses this estimate has risen to 385 inspections. As these are initial inspections of new businesses where the trader may have no previous history of operating a food business the initial inspection may take longer to complete.
- The service has come under pressure due to the success of the 'Safer Food Better Business' project. The project has trained 372 businesses in Brighton & Hove, 83% of the target number of 450. This generated an additional 163 unplanned visits to validate the level of take up of the food safety management system following training and coaching.
- A proportion of the Food Standards Agency direct grant aided training is being re-focused on higher risk premises. The original agreement was to focus on medium risk premises. This alteration is viewed as a way of maximising the general benefit to the food businesses in the City.

Food Standards

There were no significant variation from the plan except that Inter authority auditing did not take place due to lack of resources. It is anticipated that this work will be carried out in 2006-7.

6.3 Areas of Improvement

Food Safety

Since major departmental restructuring in 2001, the food safety service has been provided by a specialist Food Safety team. The specialist approach has continued to provide a high quality service and give opportunities to officers to develop areas of expertise linked to project work for service improvements. Examples of planned and ongoing improvements include: -

- The service has been chosen by the Food Standards Agency to take part in the London based 'Scores on the Doors Scheme'. This will involve the publication of the food safety standards achieved by any food business within the City. The risk rating score will be given in by a star rating system, five stars for excellent and no stars for very poor. These scores will be published on the Council's website and the business will be invited to display the score at the premises. It is hoped that this will provide businesses with an extra incentive to attain and maintain the highest food safety standards. The service is working towards introducing the scheme from mid summer 2007.
- The Government has announced an independent review of all legislation enforced by local authorities lead by Peter Rogers, Chief Executive of Westminster City Council. The Legislative & Regulatory Reform Act 2006 aims to tackle unnecessary and over complicated legislation, by reinforcing risk based approach and encouraging a joined up approach to regulatory inspections and enforcement, the work of the Better Regulation Executive and The Local Better Regulation Office. This may amend the Council's Enforcement Policy.
- The Food Standards Agency has written to all local authorities to make them aware of planned changes for the monitoring of food enforcement activity, and the introduction of a new food safety code of practice in April 2008. To assist local authorities prepare their Information Systems for April 2008 they will be required to report activity for the first nine months only of the financial year from April to December 2007.
- The service agrees with the requirement to wherever possible reduce unnecessary burden on businesses and follows a risk based approach to enforcement. A strategy to include small domestic childminders in the alternative enforcement model outlined in 3.1 is currently being developed.
- It is the long-term aim of the service to utilise IT solutions to reduce the amount of paper produced and improve the efficiency of the service.
- Promoting and improving the arrangements in respect of Home Authority agreements

Additional project areas and associated staff training and development requirements are identified through team meetings and the appraisal scheme.

Food Standards

Unfortunately the service has encountered further staff shortages over the past year due to resignation. Plans are in place to train up new staff and it is hoped that with increased flexible working systems these matters might be improved upon.

Issues that affect our ability to achieve the targets include staff retention and qualifications. Funding has been secured to enable a new officer to qualify as a trading Standards Officer and develop their food competency.

Areas for improvement are as follows:

- Improve use of the Environmental Health newsletter to provide businesses with information.
- Benchmarking
- Improve voluntary contact by businesses
- Document procedures to monitor progress and report on variations from the Service Plan.
- Improve access to on line business advice.
- Improve publicity for the healthy eating education message.

