

INTRODUCTION

The overall objective of the Environmental Health Section within the Environmental Services Department is to protect and promote the health, safety and living conditions of residents and those working within East Lindsey.

This Service Plan sets out the aims, objectives and work programmes which the Food Safety section, within the Environmental Services Department will pursue for the current financial year and the resources stated in both financial and staffing terms.

The overall aim is to provide high quality cost effective services which will stand favourable comparison with commercial undertakings. The principles of 'Best Value' will be furthered during the year.

Our continuing success is due largely to the skill and commitment of the team members - our greatest asset. Maintaining the Investors in People award will further improve the quality of services offered.

The structure of the team and the specialist work areas are set out in detail in the plan which establishes a base on which to build future enhancements, and which will be reviewed each year.

1.0 SERVICE AIMS AND OBJECTIVES

1.1 Aim and Objectives

To discharge the statutory function and responsibilities of existing and proposed food safety legislation by providing sufficient enforcement activity, advice and education in the field of food safety, in an attempt to remove ill health and injuries from food activities.

To carry out a planned programme of food premises inspections on a prioritised risk assessment basis; to respond to food complaints; to investigate cases and outbreaks of infectious disease; to routinely sample foodstuffs and to promote food safety by education and any other means.

1.2 Links with Corporate Aims and Performance Plans

These have been identified as follows:

1. To achieve economic prosperity.
2. To improve access and infrastructure within the district.
3. To improve individual and community health and well-being.
4. To make best use of our assets and serve the community.
5. To make our communities safer.
6. To sustain and enhance our environment.

The Council's performance plan for 2003-2004 confirms our aim to maintain a high standard of food/catering establishments by regular inspections and a target of 98% (high risk) & 95% (low risk) of those premises prioritised to be inspected is specified.

1.2.1 Food Safety Enforcement has several links to corporate objectives especially as food growing, preparation, production and retailing form a very significant part of the economic and social well being of the district. Some of the major employers of people in the district are food businesses, for example Butlins Funcoast World at Ingoldmells provide direct employment for over 1,250 people. The last 25 years has seen a dramatic increase in the number of leisure and cultural facilities in the district and in many cases these are associated with food and drink. The trading environment in the district now provides for a diverse variety of food outlets which are of benefit to local residents and an increasing number of visitors. All these activities are providing both direct and indirect employment and assist in providing enhanced economic activity, improved quality of life, the continued well being of the area, access to a healthy and fulfilled lifestyle and low levels of unemployment.

1.2.2 East Lindsey District Council is also fully committed to the Government's Best Value initiative and the securing of continuous improvement in the exercise of all its functions, having regard to a combination of economy, efficiency and effectiveness. The key principles of Best Value are to Challenge, Consult, Compare and Compete. Food Safety Enforcement is included within a 5 year cycle of reviews as part of a review of the Commercial functions of Environmental Health Services.

The Best Value Indicators for 2003/2004 are also noted and the District Council is committed to achieving compliance with these indicators.

Several internal performance monitoring measures are in place eg

- Programmed inspections carried out in accordance with Food Safety Act Code of Practice No.9
- Best Value inspection targets complied with
- Response times for:
 - (1) foodstuff and food premises complaints
 - (2) infectious disease investigations
- Accompanied visits with officers
- Benchmarking with other authorities
- Full compliance with Enforcement Policy
- Continued provision of a Health Education Programme

- Customer satisfaction with the services provided
- Sampling of private water supplies in line with statute

2.0 BACKGROUND

2.1 Profile of East Lindsey District Council

The population of the district is 124,000, rising to 240,000 at peak holiday times. This figure is subject to fluctuation during the summer months with the coastal strip being a significant tourism attraction.

The district covers an area of 700 square miles in the north east of Lincolnshire. It is by linear measurement a maximum distance of approximately 46 miles, north to south and 35 miles east to west. The district is predominantly rural with the main population centres located at Louth, Skegness, Horncastle, Mablethorpe and Spilsby. The area is made up from more than 200 individual parishes. The main administrative centre for the Council is based at Manby (four miles east of Louth) but smaller council offices are provided at all of the above centres.

2.2 Organisational Structure

The food safety function is under the control of the Head of Environmental Health & Housing who reports to the Director of Environmental Services.

The Manager (Food) who reports to the Head of Environmental Health & Housing has been appointed with specific lead responsibility for food matters. Liaison arrangements are in place with the County Council and other bodies.

2.3 Scope of the Food Service

The food safety service is provided by a multi-function team of qualified officers who are also responsible for delivering the following services:

- Health & Safety at Work Enforcement
- Health Promotion
- Infectious Disease Control
- Private Water Supply Monitoring

As a District Council we are responsible for enforcement of all food safety matters with the exception of those involving product labelling, weights and measures, animal food stuffs etc, which are dealt with by the Lincolnshire County Council Trading Standards Department.

2.4 Demands on the Food Service

Premises Profile - Food business are scored after each inspection in line with guidance given in the Food Safety Act Code of Practice 9. These scores categorise the businesses into risk bands. Band "A" being the highest risk.

Risk Categories, showing numbers of premises in each band as at 1st April 2003:

A	-	9
B	-	173
C	-	1180
D	-	221
E	-	296
F	-	104
Total:		1983

There are proposed amendments to Food Safety Act Code of Practice 9, which if implemented could have a significant impact on the service as more frequent inspections will need to be carried out for the higher risk premises. There are an additional 95 premises that are classed as being outside the regular inspection programme due to their inherent low risk. These include Primary Schools where no food is prepared for the pupils and grain hauliers. A further 35 premises were not categorised, these are mainly previously used or proposed to be used as food premises and requiring visits to check if opened.

The following premises are registered, approved or licensed

Food Registered*	1,876
Licensed as Butchers Shops	48
Meat Product Approved premises	8
Dairy Product Approved premises	8
Fishery Product Approved premises	2
Game Dealers Licensed	19
Seasonal Poultry Slaughter Houses	10

* Not all food business are required to be registered.

2.4.1 Service Availability

The Food Safety Services are based at Manby, but the Horncastle and Skegness area offices are also manned daily operating within the hours of 9.00am-5.00pm Monday to Thursday and 4.30pm on Fridays. A facility for out of office hours contact with officers is in place through home numbers of certain officers being available and out of office hours visits to premises are made routinely, where the main operations occur outside normal working hours.

2.5 Enforcement Policy

A documented enforcement policy has been produced. In addition the District Council has signed up to the "Enforcement Concordat" as promoted by the Cabinet Office. All officers are expected to act in accordance with this policy. The policy is available for local businesses to view.

In addition to the above, new premises and those reopening after closure will require inspection.

3.1.2 Food revisits to check on required works are scheduled in accordance with the document "Procedures Manual - Programmed Food Hygiene Inspections". On the basis of previous experience the number of revisits projected for the year 2003/2004 is 500 or 42 average per month. In addition 120 annual survey or sampling visits are projected as well as 200 annual advice or new premises visits.

3.1.3 Specialist Areas of Food Safety Enforcement

(a) Approval of "Vertical Directive" Manufacturing/Processing Premises

Regulations made under EU Directives require that premises dealing with:

- Meat and Meat Products
- Fish and Fish Products
- Dairy Products
- Egg Products

must be approved by the Food Authority

The approval process is complex and involves close involvement with the business. Prior to opening, if it is a new business, a very detailed audit must take place before the final approval number can be issued and food can be released for human consumption.

The unique premises approval number enables food to be distributed throughout the EU without further restriction.

Major refurbishment and extensions to production facilities which are already approved must go through a similar process before launching product from the altered premises.

Food businesses whose activities alter to bring them within the scope of the vertical directives, go through the same approval process. The detailed procedure is in the 'Food Safety Procedure Manual'.

(b) **Registration of Food Businesses**

Premises not covered by Vertical Directives do not require an official approval number but will nevertheless need to satisfy the Food Authority that they comply with the Food Safety (General Food Hygiene) Regulations 1995 and other legislation where appropriate, prior to producing food. The process is therefore similar to that used for approved premises. A detailed procedure based around the completion and submission of the food premises registration application form is in the 'Food Safety Procedure Manual'.

3.1.4. Formal Actions

In accordance with the enforcement policy formal actions to secure compliance are required. Over recent years the level of formal action has approximated to:

Improvement Notices served	-	26
Formal Cautions issued	-	22
Prosecutions taken	-	2

Actions such as these involve a great deal of officer and management time.

Resources

Time allocated to the inspection of premises and administration of these inspections by technical officers/EHOs is projected for the year 2003/2004 as 4,500 hours. Time allocated to revisits to premises and administration of revisits by technical officers/EHOs is projected as 525 hours.

Note: Not including travelling

3.2 Food Complaints about Premises and Foodstuff

It is this Authorities policy to ensure that all relevant food complaints are appropriately investigated and dealt with having regard to the Food Safety Act 1990 and the various Codes of Practice, together with guidance issued by the Food Standards Agency and LACORS.

Officers are required to operate in accordance with the Departments Food Complaint procedure which includes response times for various complaints.

Depending on the complexity of the food complaint, the investigation process will vary considerably.

Referrals to us of foodstuff complaints made under the Home Authority Principle can be very complex and often involve detailed inspection and investigation of a

food manufacturing plant, taking 6-8 hours to complete the technical and administrative process.

Other foodstuff complaints received and investigated by this office as the investigating authority will often not require a site visit but nevertheless such investigations are often lengthy and time consuming.

Less complex complaints may only take 2-4 hours. The approximate average time to deal with the various types of food complaint would be 4 hours.

Average number of Formal Food Premises and Foodstuff Complaints per year - 190.

Resources

Current Admin. Support, Technical Officer and EHO time spent on all “Commercial Complaints” equates to approximately 15 hours per week.

(Not including travelling)

3.3 Home Authority Principle

It is the policy of this Council to adopt the Home Authority Principle and act within the “Guidelines for Home Authorities” issued by LACORS.

The resources available to deal with all aspects of food safety and in particular the food manufacturing industry are limited and for this reason only the “Essential Elements” contained within the LACORS Home Authority Guidelines will be available to local businesses.

The majority of the “Essential Elements” in the Home Authority Guidelines are expectations placed on a Food Authority from legislation and include inspection and approval of premises, investigating food complaints, & sampling.

The resources needed to carry out these functions are included under the relevant sections of this plan.

No Formal Home Authority Agreements exist between the Council and the local food businesses. However this authority does act informally as originating authority for several other food businesses

These partnership arrangements have been beneficial to the businesses and have assisted the District Council to improve consistency of operations and practices throughout their business which contribute to food safety locally, and nationally.

Resources

An average of 30 hours per annum of EHO time is spent acting as Originating Authority for the businesses with whom we have partnerships. (Not including travelling)

3.4 Advice to Business & Partnerships

It is the policy of the Council to encourage officers whenever possible to offer advice to businesses as we see this as the first step towards achieving compliance in the first instance and act as enforcement officers if the educative approach fails. This policy is reinforced in FSA Codes of Practice.

The Food Premises (Registration) Regulations require a minimum of 28 days notice to the Food Authority prior to opening. This is to give the authority an opportunity to inspect the premises and offer advice on compliance before preparing or selling food.

Offering advice is an integral part of the Food Safety Officer's work and it cannot be separated from routine inspection or enforcement activities.

In addition to the advice given during routine inspections approximately 200 requests for advice at proposed new businesses or businesses proposing significant alterations and requiring a site meeting will be received during the year.

3.4.1 Working with Business

East Lindsey District Council is committed to maintaining liaison with food businesses in the district as demonstrated above.

In addition specific arrangements are effected as required to inform businesses of new legislation e.g. seminars held in 1995 for the introduction of Food Hygiene (General) Regulations and Butchers Licensing July 2000. Businesses are regularly surveyed with service user surveys and the results of these surveys are acted upon. New businesses, premises or proprietors are identified and contacted by means of planning/building control applications, liquor licence applications, surveys, legal searches etc. At present no formalised, regular arrangements for liaison and partnership with local businesses are in place, any such arrangement would have resourcing implications.

Formal contact by businesses which results in a visit to a commercial premises is recorded, service requests by business e.g. phone enquiries are also recorded.

Requests for advice from local businesses are estimated as in excess of 35 per week for food related matters.

3.5 Food Inspection and Sampling

It is the policy of the Council to carry out sufficient sampling of foods and water to satisfy the requirements of Codes of Practice and Statute and to monitor standards in the District.

Routine food sampling is carried out in combination with drinking water sampling. A sampling policy for all samples taken by the commercial section is in place together with a system of work for such sampling. Food sampling is in accordance with an agreed Lincolnshire programme. These samples are submitted to Lincoln Path Links Laboratory.

Food and water samples are also routinely taken from approved food premises. The largest of these being a commercial dairy is sampled every month and more frequently if any problems are identified.

Cockles are sampled monthly from a bed at Horseshoe point as part of the national surveillance scheme. This involves two officers (for safety reasons) taking a 2.5 hour round trip to collect the cockles. Recent problems with diarrhetic shellfish poisoning (DSP) associated with cockles from The Wash have resulted in the issue of Temporary Prohibition Orders. Close liaison has taken place with other local authorities particularly involving attendance at the Lincolnshire/Norfolk/Cambridge Shellfish Liaison Committee.

Resources

Samples resulting from complaints are examined within the food safety team and where necessary submitted to the Public Analyst (PA). Approximately 100 foodstuff complaints are received annually and an average of 10 are sent to the PA. Programmed annual food and water samples total about 250 and 100 respectively.

Time allocated to sampling of foods for both Admin Support and Technical Staff is 400 hours. The time allocated for water sampling is 150 hours. (Not including travelling).

3.6 Food Poisoning and Infectious Disease Control

It is the policy of this Council to respond with appropriate haste to all notifications of food poisoning and infectious diseases.

A protocol to guide the investigation of notifications of food poisoning and infectious disease has been developed in association with the CEHO Food Group and Lincolnshire Health. This document includes agreed response times for various infections.

Liaison takes place with: GP's, Hospitals, PHLS, Lincolnshire Health, Other LA's, Food Businesses and the Food Standards Agency depending upon the circumstances of each case.

It is difficult to pre-plan the availability of staffing resources for this activity as individual notifications and outbreaks cannot be predicted and are often sporadic.

When incidents occur it may be necessary for the whole team to become involved. The investigation must take priority and other work is rescheduled. This can create problems in other areas of work activity. Due to the nature and possible consequences of notifications, responses must be made within the agreed maximum time scales set out in the protocol.

Infectious Diseases do not respect Council boundaries, therefore in addition to the common Lincolnshire protocol, close co-operation must exist between other Local Authorities and external agencies. To ensure the co-operation exists, Countywide exercises take place.

Emergency cover exists through the Council's out of hours service arrangements.

Resources

An average of up to 300 notifications are received each year of which approximately 290 are regarded as significant by EHS and will be investigated in accordance with the above mentioned protocol. Total time spent on all aspects of Infectious Diseases averages at 12.5 hours per week made up of 2.5 hours. Admin. Support and 10 hours EHO/Technical Staff. (Not including travelling).

3.7 Food Safety Incidents

Food Hazard Warnings are defined in the Food Safety Act Code of Practice No. 16 which sets out the actions local authorities are expected to take. It is the Council's policy to respond with due haste and in line with the Code of Practice. Category A and B warnings require a rapid response which may involve many or all of the Food Safety Team. The response will take priority over routine work.

The procedure for dealing with such incidents is set out in the procedure manual.

Hazard warnings received in the previous year were:

Category A Immediate Action	0
Category B Action	6
Category C Action as deemed necessary	0
Category D Information only	20
Total	26

3.8 Liaison with Other Organisations

The Council recognises the importance of acting in a consistent manner with neighbouring authorities.

Arrangements in place to ensure that enforcement action taken in the area is consistent with those of neighbouring Local Authorities include:

1. Membership of Lincolnshire County CEHO Food Group which has:
 - encouraged development of common protocols;
 - organised consistency training events and exercises;
 - organised and conducted consistency audits (Inter Authority Audits);
 - liaison with other county food groups;
 - organised county benchmarking arrangements.
2. Membership of Lincolnshire County Infectious Disease Sub-Group in partnership with Lincolnshire Health Authority
3. Membership of Lincolnshire Environmental Health Group
4. Consultee for relevant planning and building control applications.
5. Compliance with LACORS guidance
6. The Food Safety Manager also sits on the Chartered Institute of Environmental Health' 'Expert Advisory Panel' on food safety
- 3.8.1 Regular liaison is held as necessary with other departments of the Council such as Legal, Planning and Building Regulations and the database of commercial premises is maintained by mechanisms such as: Local Authority Searches, Rating Register etc.
- 3.8.2 Regular contact and liaison is maintained with Anglian Water Authority. Annual liaison meetings are held and occasional desk top exercises are convened. Anglian Water contact this authority whenever liaison values are breached or incidents occur. This can involve significant resources in respect of the issue of 'boil notices' etc.

Resources

An estimate of the resources to service the above liaison arrangements would be approximately 33 working days of EHO time.

(Not including travelling).

3.9 Food Safety and Standards Promotion

The Council recognises the importance of Food Safety Promotion within the framework of a Health Promotion Plan.

Promotional work is carried out by means of the Heartbeat Award; participating in national initiatives such as food safety week; organising local initiatives such as Christmas food safety campaigns; on an ad hoc basis in response to Hazard Warnings or similar by use of the local radio and press media; and by occasional presentations to community groups as resources permit.

This aspect of the sections activities is limited by resources and the demands of other functions within the department. The proposed best value review may identify and suggest improvements. The consideration of a national food hygiene award scheme by the FSA is noted. If either a local award or participation in a national scheme is anticipated this will have resourcing implications.

Resources

The provision of 55 Heartbeat Awards is projected for year 2003/2004. Current Admin. Support, Technical Officer and EHO time spent on Health Promotion and Home Safety is 4 hours per week

(Not including travelling)

4.0 RESOURCES

4.1 Financial Allocation

Extracts from the Council's budget sheets indicate as follows:

Food Safety	2002/2003	Estimate 2003/2004
Employee costs	262,570	253,800
Premises costs	5,660	4,790
Transport costs	34,460	39,500
Supplies and services	10,150	9,400
Support services	62,420	62,090

4.2 Staffing Allocation

The staff allocated to Food Law Enforcement are as follows:

	Full Time Equivalent
*Food Safety Manager – Leads the Team and is also responsible for other services. Becomes involved in technical issues. Does not contribute significantly to the risk inspection programme targets. Is the lead officer for all food matters as well as, Infectious Diseases, Water Supplies and food related Health Promotion. Also responsible for policy and liaison.	0.55
*Senior EHO – Deputises for FS Manager and is actively involved in contributing to the risk inspection programme targets and involved in all Food Safety activities.	1
*EHO – Contributes to risk inspection programme targets and involved in all Food Safety activities.	3
Technical Officer – Contributes to risk inspection programme targets, carrying out inspections in food premises rated C,D,E, & F and involved in all Food Safety	2

activities.	
Technical Support Officer – Involved in operation of food sampling programme, investigation of infectious disease control, low risk inspection programme targets.	1
Admin Support Officers – Carrying out all administrative support duties associated with food safety, infectious disease control and sampling activities.	0.5

*Qualified to undertake all aspects of food law enforcement under Food Safety Act Codes of Practice.

The CIPFA annual activity analysis indicates that 21.1% of Environmental Health Services time is spent on food safety, and infectious disease control.

4.3 Staff Development Plan

The Council recognises it is essential that staff in food law enforcement are qualified and trained in accordance with the Food Safety Act Code of Practice and it is Council Policy to ensure that a suitable development and training plan is in place. This is effected via the Investors in People approach and associated appraisals to ensure officers are suitably qualified and maintain competency as required in Code of Practice No.19 which specifies at least ten hours per annum ongoing training for officers.

On going training of all staff is arranged as necessary and this includes:

- Attendance at approved training courses to qualify staff as required by Codes of Practice.
- Regular in-house briefings during Team Meetings as well as ad hoc specific meetings.
- Attendance at training events organised jointly with legal services to assist in compliance with required legal procedures.
- Attendance at training events co-ordinated by the Lincs CEHO Food Group
- Attendance at appropriate training events organised by the Food Standards Agency, LACORS and other agencies.

5.0 QUALITY ASSESSMENT

The Council is committed to the principle of Best Value and continuous improvement, including the provision of a quality service and associated reviews of quality measures.

The following measures are in place to assess the quality and levels of performance achieved in food law enforcement:

- Documented procedures including:
 - Inspection of Food Premises Guidance
 - Food Complaint Investigation Guidance
 - Investigation of Food Poisoning and Infectious Diseases Guidance
- All actions taken and information given post inspection is monitored to ensure consistency and compliance with Food Standards Agency or LACORS guidance
- Officers are aware of and have access to relevant publications and documents
- Collation and publication of national and local key performance indicators
- Benchmarking against other local authorities
- Development, organisation and implementation of “peer audit” (Inter Authority Auditing) for the Lincolnshire Food Authorities.
- Accompanied visits by the Food Safety Manager to ensure consistency in inspections.
- Achieving and maintaining the Investors in People Award.

A policy document setting out the Quality measures in place has been produced.

6.0 REVIEW

6.1 Review against the Service Plan

1. To continue to maintain the existing levels of performance in respect of
 - a. Inspections
 - b. Revisits
 - c. Special Visits
 - d. Other Advisory Visits
 - e. Complaints
 - f. Infectious Diseases
 - g. Sampling
 - h. Home Authority Work

2. To seek to improve links and partnerships with businesses and individuals affected by the service.
3. To review and redraft as necessary internal policy and procedural documents. All documentation relating to food safety, infectious diseases and water supplies to be reviewed within the period.
4. To seek to comply and achieve all relevant Best Value Indicators and maintain continuous improvements.

6.2 Identification of any Variation from the Service Plan

A review will be carried out at the completion of the financial year, together with ongoing assessments during the year.

6.3 Areas of Improvement

Any areas of improvement identified by the review will be specified in an improvement plan.

NOTE: A best value review of food safety enforcement is projected within the overall review of commercial functions.

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May 2003