



Breckland Council

Environmental Health

Food Safety Service Plan

2008/2009

To Meet Compliance with

Food Standards Agency Framework Agreement

Glossary

CIEH	Chartered Institute of Environmental Health
EH	Environmental Health
EHO	Environmental Health Officer
EU	European Union
FSA	Food Standards Agency
HACCP	Hazard Analysis and Critical Control Points
HPA	Health Protection Agency
ICT	Information Communications Technology
LACORS	Local Authorities Co-ordinators of Regulatory Services
TO	Technical Officer

1. **Aims and Objectives**

1.1 **Aim**

- To ensure the production and sale of safe food and improve the health of Breckland's residents and those eating food produced in Breckland by reducing the incidence of food poisoning and food borne illness.

Objectives

- To meet the 'standard' set out in the Framework Agreement on Local Authority Food Law Enforcement issued by the Food Standards Agency.
- To contribute to the Council's Annual Delivery Plan by assisting the Council to achieve its priorities, through the principles of performance, partnership and participation.

1.2 **Council Priorities**

The Council Priorities will be detailed in the Annual Delivery Plan 2008/2009. This Food Safety Service Plan details performance to implement the 'building safer and stronger communities' priority. It supports the Environmental Health Service Team Plan.

1.3 **Stakeholders**

Stakeholders include inhabitants of and visitors to Breckland, operators of Breckland's food businesses and consumers of food produced in Breckland.

2. **Background**

2.1 **Profile of Breckland**

Breckland is one of the largest rural districts in England, at 1,305 square kilometres. Much of the area is given over to agriculture, with large open spaces of heathland known as the "Brecks" from which the district gets its name. The nature of the area brings challenges in terms of transport and access.

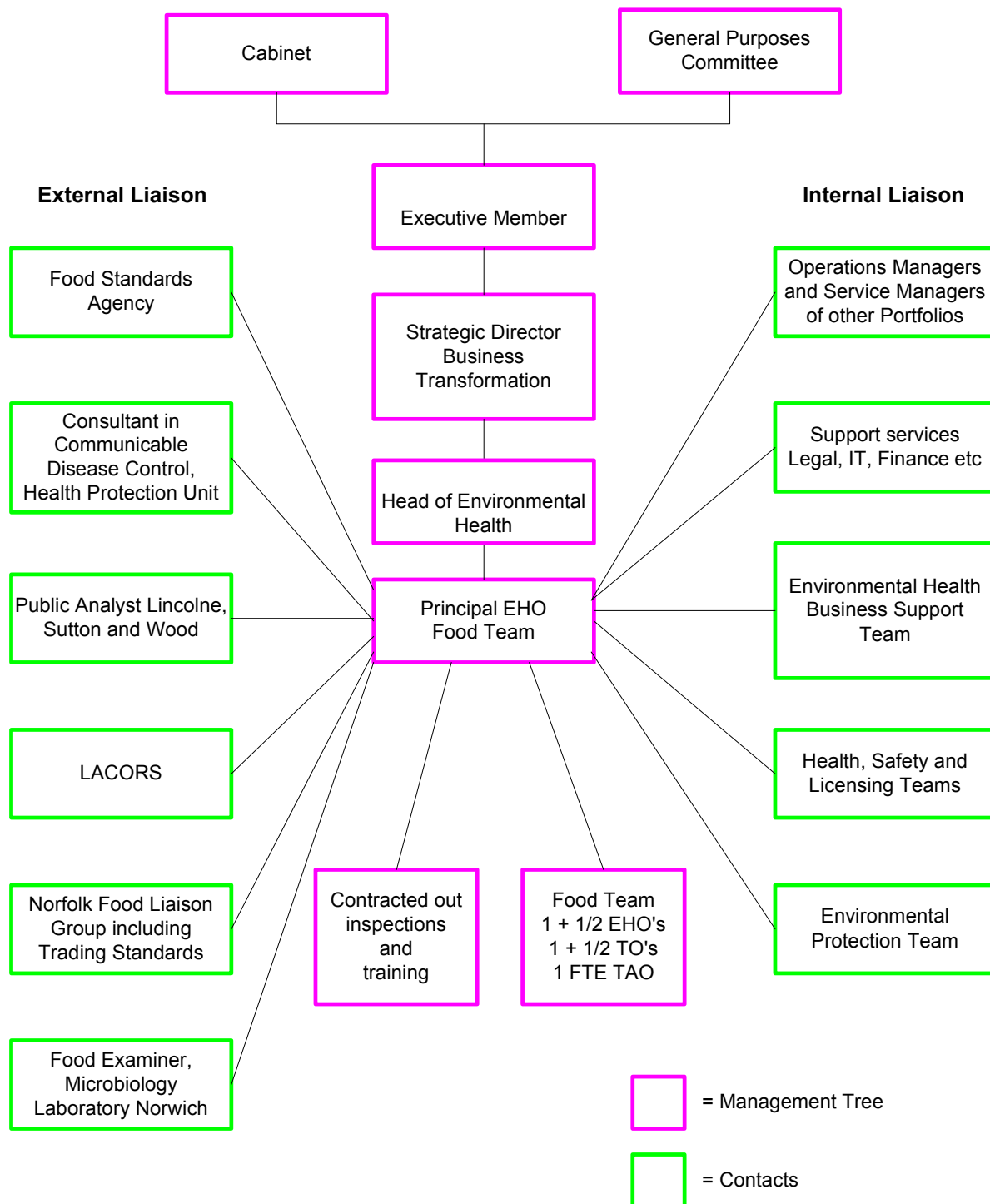
Breckland is centred around the five market towns of Attleborough, Dereham, Thetford, Swaffham and Watton, but there are also 107 rural parishes. The mid year population in 2005 was 127,100. Breckland also attracts an estimated 1.5 million visitors each year.

We have a growing population of migrant workers and families moving to Breckland from Latvia, Lithuania, Poland and Romania. We also have an established Portuguese community which has built up over many years. Food businesses run by those not having English as a first language include those speaking Chinese, Turkish, Bengali, Thai, Portuguese and Latvian.

In common with the rest of Norfolk, most people in Breckland work in the retail, distribution and catering sectors. However, there are huge differences between the towns, with manufacturing accounting for nearly 50% of employment in Thetford.

2.2 Organisational Structure – Breckland Food Team

Detailing only those parts of Breckland's organisation directly relevant to management of the Food Team



2.3 **Scope of Food Service**

The Food Team is responsible for all aspects of food hygiene including infectious disease and food safety related health promotion. Food nutrition and other personal health issues are not within the remit of the Food Team. A separate team carries out health and safety inspections but liaison takes place with regard to common issues such as the computerised database, inspection frequencies and legal action. The Food Team at present use a contractor for food hygiene training and some food hygiene inspection work.

2.4 **Events Likely to Affect the Work of the Food Team During 2008/2009**

Transformation

The Food Team, together with the rest of Environmental Health, are now part of the Transformation Directorate. It is not known how this will affect the work of the team, although it is expected in the early stages it may absorb officer time, hopefully with some economies in the long run.

Generic Working

The Food Team is involved in some work with other teams including smoking legislation and health and safety interventions.

Recommendations from Food Standards Agency on “Scores on the Doors”

These are likely to be issued during 2008 following a national consultation exercise. A report will be produced recommending a “Scores on the Doors” system in Breckland. There will, however, inevitably be an involvement of officer time in setting it up such a scheme and there are likely to be budgetary implications.

Broadly Compliant

The Food Standards Agency have introduced a new national performance indicator requesting statistics relating to the percentage of food premises that are not “broadly compliant” with food safety legislation. These premises will receive considerable extra input of time from the team with the intention of reducing that number to a very bare minimum using all the tools at our disposal, including education, promotion and enforcement. This may have an impact on other work of the team and department.

Revised Code of Practice

A Revised Code of Practice is likely to be received from the Food Standards Agency early in 2008/2009 which may well impact on the Food Team’s working methods and require updates to procedures and protocols etc.

2.5 **Demands on the Food Service**

On 1 April 2008 there were 1332 food premises in Breckland. The number of each type of food business is as follows:

Type of Food Business	No. of Premises
Producers	21
Manufacturers	24
Importers	3
Packers	10
Slaughterhouses	7
Distributors/Transporters	36
Retailers	324
Restaurants/Caterers	890
Manufacturers selling mainly by retail	17
Total	1332

Approval/Licensing/Registered Premises at 1 April 2008

1200 premises were Registered and 8 premises are Approved.
124 Good Food Hygiene Awards are current.

New food businesses and existing food businesses identified that are not registered or approved, but that should be, will be recorded on the Food Team database and will be subject to a full inspection and will be required to apply for registration or approval.

The rural nature and large size of the district necessitates much time and expense in travelling. There are several major food processors, including meat products and preparations and vegetable processors. There are many agricultural producers including egg producers, small poultry slaughterhouses and farmers selling meat directly to the public. With more farmers diversifying into food businesses much support is needed. The majority of food businesses are catering but there are a number whose needs are different such as food businesses where staff speak languages other than English.

Service Delivery Points

The Food Team is based at the Dereham Office which is open from 9.00 am to 5.00 pm Monday to Thursday and 9.00 am to 4.30 pm Friday. Out of hours availability is on a voluntary basis through the Flagship Housing Association 24 hour call centre. Food complaints and requests can also be received at the Thetford Office. Requests and information can also be received at part-time Presence Offices at Attleborough, Swaffham and Watton. In view of the rural nature and large size of the district the team are committed to carrying out visits to receive complaints and to fulfil service requests where necessary.

The Food Team is connected Chartered Institute of Environmental Health's (CIEH) intranet service (EHCnet) and is accessible by e-mail and website. The team is fully committed to development of the Breckland website for communication with food businesses and the public.

2.6 Enforcement Policy

Enforcement action is carried out in accordance with Breckland's Enforcement Policy which complies with the Enforcement Concordat and the Home Office Code of Practice for Crown Prosecutors. The Enforcement Policy has been approved by the Council and a summary is available on the Council's website. The Council are working in partnership

with the Norfolk Better Regulation Partnership to ensure a standardised and consistent approach to enforcement activities.

3. Service Delivery

3.1 Food Premises Inspections

Breckland's policy in relation to food premises inspection is based on the Food Law Code of Practice. This is to ensure that all premises are inspected at an appropriate minimum frequency determined by risk rating. The frequency varies from one to three years. Where circumstances prevent 100% of inspections in accordance with these frequencies, priority is given to higher risk (Band A, B and C) premises.

Food hygiene inspections are carried out in accordance with the Food Hygiene Inspection Protocol which complies with the Food Law Code of Practice in all respects and which also complies with advice given by the Local Authorities Co-ordinators of Regulatory Services (LACORS).

Food businesses that fail to comply with significant statutory requirements will be subject to appropriate enforcement action and secondary inspections.

The Council's Enforcement Policy is complied with in relation to all action taken by officers, and specific protocols detail action to be taken in relation to the service of Hygiene Improvement, Hygiene Emergency Prohibition and other Notices in accordance with the Food Law Code of Practice.

Inspections of food premises will include checks on imported food and potentially unfit food.

Food businesses will always be inspected when they are open for business whether or not that is out of normal working hours.

Premises Profile

Number of food premises by type and risk band at 1 April 2008

	Producers	Manufacturer	Importers	Packers	Slaughter houses	Distributors	Retailers	Restaurants	Man mainly retail	TOTAL
Band A	0	0	0	0	0	0	0	1	1	2
Band B	0	1	0	1	0	0	4	62	2	70
Band C	1	9	1	2	1	1	64	378	11	468
Band D	2	2	1	2	0	5	47	136	2	197
Band E	16	4	1	5	1	28	198	276	1	530
Unrated	2	5	0	0	0	1	10	26	0	44
Not insp rated	0	3	0	0	5	1	1	11	0	21
Total	21	24	3	10	7	36	324	890	17	1332

Inspections Due 2008/2009

Approximately 674 premises are due for inspection during 2008/2009 as follows:

Risk	Band A	Band B	Band C	Band D	Band E	Unrated	Total
High	2	60	311				373
Low				96	186		282
Unrated						9	9
Total							664

At least 100 additional businesses will also need inspection due to change of ownership, new businesses opening and following complaints received from the public etc.

Alternative Enforcement Strategy

The Food Law Code of Practice permits alternatives to inspections for very low risk premises, comprising most Band E premises. Breckland's Strategy will involve sending letters with checklists requiring a response to such premises. Those not responding, and a random 10% of those who do respond, will still receive an inspection. This Strategy will enable resources to be diverted to those higher risk premises not achieving good standards. It is expected that 80 inspections will be saved.

Revisits

It is anticipated that at least 300 revisits will be needed during 2008/2009.

Hazard Checks

It is anticipated that up to 200 hazard checks will be carried out during 2008/2009 compared with approximately 70 during 2006/2007.

Resources

It is anticipated that up to 300 inspections will be contracted out during the year. These will include most low risk premises and some higher risk premises. All Bands A and B premises, most new premises and all premises with poor confidence scores will be inspected by the Food Team.

Performance Indicators and Targets 2008/2009

- To report on a Breckland "Scores on the Doors" scheme and, subject to approval, introduce it during the year.
- To achieve 90% of inspections of all food premises due within 28 days of the due date with priority being given to Bands A, B and C.
- To achieve 75% of inspections by the due date.
- To persuade, promote and enforce the provision of written safe food procedures and records of checks in premises inspected during the year appropriate to the nature and size of the business, using Breckland's HACCP pack, Breckland's Checklist Project and SFBB packs. Revisits to be carried out until full compliance is achieved.
- To reduce to a minimum the number of premises not achieving a "broadly compliant" score by carrying out extra primary inspections followed by hazard check inspections at about three monthly intervals between final revisit and next primary inspection.

- Good Food Hygiene Awards to be issued to premises achieving best practice including written hazard analysis system and records of checks, until a “Scores on the Doors” scheme is introduced.
- 100% compliance for actions taken in accordance with the Enforcement Policy.
- To maintain an up to date register of all food businesses by registering all new businesses.
- To implement the Alternative Enforcement Strategy for low risk businesses.

Inspection of Specialised Premises

There is adequate competency within the team for inspection of all types of food premises in Breckland.

3.2 Food Complaints

Breckland’s policy in relation to food complaints is based on advice given by LACORS. Food complaints are investigated in accordance with complaint protocols relating to the contamination of food, unfit food, out of code food, food hygiene complaints and food poisoning complaints. The Council’s Enforcement Policy is complied with in relation to all action.

	2006/2007	Likely 2007/2008	Estimated 2008/2009
Total complaints	158	170	170

Demand on the Service is likely to be similar to previous years.

Performance Indicators and Targets 2007/2008

- 90% of first responses to complaints to be within three working days.

3.3 Home Authority Principle

Breckland supports the Home Authority Principle as detailed by LACORS.

Breckland is committed to maintaining good relationships with businesses in Breckland for whom it acts as home or originating authority. Additional time is allowed during inspections to provide all advice necessary.

In particular Breckland is committed to forming Home Authority Partnership Agreements with interested businesses. Two of the five previous agreements have now ceased due to the businesses no longer trading. This commits Breckland to extra audit visits and support.

Requests for investigations by other local authorities, in relation to food complaints arising from food produced in Breckland, will be fully investigated in partnership with the business concerned with a view to ascertaining the cause of the complaint and preventing a recurrence. Full reports are provided to the local authorities concerned.

	2006/2007	Likely 2007/2008	Estimate 2008/2009
Number of Home Authority Partnerships	5	3	3
Number of requests from other authorities for investigation	26	26	26

Performance Indicators and Targets 2008/2009

- Audits will be carried out at 100% of food businesses with whom Breckland has a Home Authority Partnership Agreement.

Resources

Officer time has been allocated for Home Authority Partnership Audits. Demand for requests from other authorities is likely to be similar in 2008/2009.

3.4 Food Safety Advice and Training for Food Businesses and the Public

Breckland will provide advice and support to all food businesses, voluntary groups, charities and members of the public.

Breckland will offer training courses in food hygiene, giving opportunities to gain sufficient knowledge to achieve high standards of food hygiene at work, in the community or at home.

These services will be provided by:

Advice and Support

- Through Breckland's website.
- Verbal advice on request.
- Leaflets and written advice on request.
- Advice during food hygiene inspections.
- Written and verbal advice and literature to new businesses.
- Consultation visits to food businesses on request.
- Provision of Breckland's hazard pack or SFBB pack by recommendation or request.
- One to one HACCP training on site by request regarding Breckland's HACCP pack or SFBB pack.
- On site promotional visits where advice to operators or staff is needed regarding specific problems, e.g. handwashing or cleaning.
- Offering Good Food Hygiene Awards to food businesses.
- Issuing two newsletters a year to all food businesses.

Training

The following will be provided subject to adequate demand:

- A programme of Basic Food Hygiene Courses.
- Provision of in-house Basic Food Hygiene Courses on request.

The provision of Intermediate and Advanced Food Hygiene Courses and own language Basic Food Hygiene Courses for ethnic businesses can only be provided in partnership with other training organisations.

Advice and training	2006/2007	Likely 2007/2008	Estimate 2008/2009
Number of requests for advice	787	700	700
Number of food hygiene courses	16	13	13

Performance Indicators and Targets 2008/2009

- 90% of responses to service requests to be within 3 working days.
- 100% of demand for food hygiene courses to be fulfilled.
- Two newsletters to be issued during the year.
- To ensure Breckland's website is kept up to date with regard to food safety issues and to utilise the website to enable more advice to be provided by that means.
- All businesses with serious HACCP contraventions to be offered one-to-one HACCP training and promotional visits.

Resources

- Food Hygiene Courses will be provided by a trainer contracted for this purpose. This is an income generator that covers the cost incurred.
- Demand for requests for advice is likely to remain stable.

3.5 Food Sampling and Examination

Informal Microbiological Sampling

Breckland will sample foods to determine the microbiological safety of food produced and sold in Breckland, to indicate trends in microbiological quality of food, to ascertain whether handling, processing and storage techniques are satisfactory and to improve when necessary and to determine the effectiveness of cleaning and disinfection. Samples will be taken in accordance with the sampling protocols.

The sampling programme comprises two parts:

- The Breckland sampling programme which consists of samples of high risk food from producers or caterers in the district.
- The Eastern Region Food Liaison Group food sampling programme which is carried out in conjunction with other local authorities in Norfolk, Suffolk, Cambridgeshire and Essex. This will include samples carried out for LACORS, EU and the Food Standards Agency in conjunction with the Norfolk and Norwich University Hospital Trust microbiology laboratory and the Health Protection Agency.

All Microbiological food samples are submitted for examination to Norfolk and Norwich University Hospital Trust microbiology laboratory in accordance with a Service Level Agreement.

Informal Samples	2006/2007	Likely 2007/2008	Estimate 2008/2009
Eastern Region/Food Liaison Group programme	80	70	70
Breckland sampling programme	149	140	140

Formal Microbiological Samples

Formal food samples will be taken when necessary and submitted to Norfolk and Norwich University Hospital Trust microbiology laboratory in accordance with the Service Level Agreement.

Formal Examination and Analysis

Food complaints submitted to Breckland are examined by a member of the Food Team in accordance with the food complaints protocol. Where further detailed examination is necessary the food is submitted to the public analyst, Lincolne Sutton and Wood Ltd in Norwich.

Water Samples

These are taken by Breckland's Environmental Protection Team and full liaison takes place in relation to food premises and infectious disease investigations.

Performance Indicators and Targets 2008/2009

- 100% compliance with sampling programme.
- Breckland's samples to include 100% of manufacturers producing high risk food.

Resources

Food sampling is carried out by the team's Technical or Technical Administration Officers.

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

Breckland will investigate sporadic cases of gastrointestinal illness to prevent the spread of infection, to identify potential outbreaks, to identify common sources of infection, to promote good hygiene practices and to analyse information gained from the investigation. Outbreaks of gastrointestinal illness will be investigated in order to limit the outbreak, identify the cause and prevent a recurrence. Investigations will be carried out in accordance with Breckland's protocols. Illnesses investigated include Salmonella, Campylobacter, viral illness, E. coli and suspected food poisoning.

	2006/2007	Likely 2007/2008	Estimated 2008/2009
Cases investigated	172	200	200
No of outbreaks investigated	9	7	8

Investigations of outbreaks are extremely time consuming and always take priority over all other work.

Performance Indicators and Targets 2008/2009

- 100% of first responses to cases and outbreaks to be within two working days.

Resources

Demand is likely to be similar to previous years.

3.7 Food Safety Incidents and Food Alerts

All food safety incidents will be investigated and all Food Alerts notified by the Food Standards Agency will be acted upon in accordance with the Food Law Code of Practice.

Consideration is given during all food hygiene inspections, sampling activities, investigation of food complaints etc, to the implications of the matters found having an effect outside Breckland.

Food Alerts are treated as high priority and are responded to within 24 hours. Action required is always given top priority. They are dealt with in liaison with Norfolk Food Liaison Group to ensure consistent action.

Food Alerts Received

	2006/2007	Likely 2007/2008	Estimated 2008/2009
Food Alerts requiring no action	98	68	25
Food Alerts requiring phone calls, letters or press release	3	3	3
Food Alerts requiring calls to premises	2	1	2

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Many Food Alerts are dealt with by Norfolk County Council Trading Standards Officers as they relate to chemical contamination issues.

Performance Indicators and Targets 2008/2009

- 100% of first responses to Food Alerts within 24 hours.

Resources

Demand is likely to be similar to previous years.

3.8 Liaison with Other Organisations

Breckland will liaise with other agencies and local authorities to ensure consistency of enforcement and sharing of best practice. Liaison will be carried out as follows:

- Breckland will play a full part in the Norfolk Food Liaison Group, the Norfolk Joint Meat Hygiene Enforcement Agency Liaison Group, the Eastern Region Food Group, the Health Protection Advisory Group and the Veterinary and Medical Advisory Group Eastern Region.
- Breckland is committed to taking the advice of LACORS when there is doubt with regard to consistency, and takes account of all advice issued by LACORS.
- Breckland is committed to liaising in food sampling issues through the Eastern Region Sampling group.
- The Food Team works in liaison with other Teams in Breckland that provide services to the public to ensure consistency of approach.
- Breckland is committed to the attendance at seminars organised by the Food Standards Agency, LACORS etc.
- Liaison on new food premises is carried out by checking building regulation and planning application lists, local newspapers and advertising etc.
- Breckland will liaise with Originating/Home Authorities to ensure consistency of application of food hygiene legislation.
- The Council is working in partnership with the Norfolk Better Regulation Partnership to ensure a standardised and consistent approach to enforcement activities.
- Breckland is committed to the process of inter-authority auditing and in comparing standards with other authorities.

Performance Indicators and Targets 2008/2009

- 100% compliance with the Environmental Health Enforcement Policy.
- Ongoing inter-authority audits through Norfolk Food Liaison Group to continue.

Resources

Demand is likely to be similar to previous years.

3.9 **Infectious Disease and Food Safety Health Promotion**

Breckland is committed to food safety health promotion work with a view to making health interventions which will raise awareness of health issues in relation to food, and which will influence and inform decisions about food safety, with a view to reducing the incidence of food poisoning.

All health promotion activities will be carried out in accordance with the health promotion protocol which includes full evaluation of every health promotion project carried out.

Health promotion projects are often long term and therefore continue from one financial year to the next.

Performance Indicators and Targets 2008/2009

- The high schools' Food Hygiene Training Partnership to continue with exam papers sent out within seven days of application and certificates processed within 14 days.
- Continue use of Breckland Voice as a food safety promotion vehicle. One article in each issue of Breckland Voice.
- To continue to support schools in the development of food hygiene training for young people by assisting the development of new projects and by promoting and facilitating access to information on projects for food hygiene training for schools, including Breckland's popular 'glo-box' project.

Resources

Food safety health promotion work for 2008/2009 will continue to be carried out by Food Team Officers in partnership with others where possible.

4. Resources

4.1 Financial Allocation

The total expenditure on the food service is relatively stable, rising at most with levels of inflation.

Expenditure Trend

Description	Actual 2006/2007 £	Probable 2007/2008 £	Estimate 2008/2009 £
Employee related expenses	194,672	197,675	199,940
Transport related expenses	13,477	11,520	10,865
Supplies and services	53,610	26,265	21,595
Support services	41,751	55,540	56,910
Income (courses etc)	(9,258)	(6,311)	(6,010)
Income FSA Grant	(26,868)	(18,744)	0
Total expenditure	267,384	265,945	283,300

Normal income is derived primarily from Food Hygiene Course income which varies slightly from year to year depending on demand. The Food Standards Agency grant was spread across two financial years.

The figures show charges for supplies and services and income for 2006/2007 due to a grant from the Food Standards Agency for the SFBB project, reverting to normal for 2007/2008.

4.2 Staffing Allocation

The Food Team consists of:

- 1 x Principal Environmental Health Officer;
- 1 x full time and 1 x part time Senior Environmental Health Officer;
- 1 x full time and 1x part time Technical Officer and
- 2 x part time Technical Administration Officers.

A contracted inspections budget exists to allow employment of contractors to carry out some inspections.

Any contracted inspectors will be qualified to a minimum standard of the Higher Certificate of the Environmental Health Officers Registration Board.

Food hygiene training is carried out by a contractor.

Support for website, typing, infectious disease administration, purchasing, etc. is provided by the Business Support Team.

Resource Challenges 2008/2009

Resource challenges this year will include:

- Business transformation of Environmental Health.
- Reducing the number of premises that are not "broadly compliant".
- Introducing a "Scores on the Doors" scheme.
- Maintaining our good standards of response to customers.

Estimate of Resources Required for the Year

The work plan for the current year is designed to make the most of the resources available to the team within the budget approved. It is therefore anticipated that there will be sufficient staff and budget available to carry out the Plan in full. Estimates of the resource needs are based on comparisons with previous year's workload.

Improvements to the service detailed in this Plan will be carried out by team members.

4.3 Staff Development Plan

Breckland's appraisal system includes a fully documented Personal Development Plan which includes skill and competence training as well as personal development training. Competence training with regard to the Food Law Code of Practice will be provided for the team in-house by programmed training sessions. Additional training is carried out in conjunction with Norfolk Food Liaison Group and the Eastern Region Centre of the Chartered Institute of Environmental Health, linking with training provided by the Food Standards Agency and LACORS. In-house training is also provided in relation to information technology training and the Flare database as necessary and as systems develop. Training in management skills is also provided as necessary.

5 Quality Assessment

- 5.1 The Food Team are fully committed to the principle of continuous improvement and will continue to apply high standards to maintain our upper quartile position and excellent reputation in Environmental Health circles and our food businesses.

Breckland's protocols cover all aspects of the work of the Team and are reviewed regularly. A comprehensive monitoring programme is ongoing. Records of all monitoring is kept. The information obtained is used to amend protocols as necessary and to retrain and give feedback to staff.

The ethos of the team is to be the most knowledgeable, flexible and agile in these times of continuous change and to be willing to take risks and be adept at innovation in order to achieve the Council's Priorities and those of the Food Standards Agency.

Performance Indicators and Targets for 2008/2009

- Implement the Food Team monitoring programme to improve standards.
- Take part in customer surveys together with the rest of Environmental Health.