Food Safety
Business Plan

2011-2012

www.southwark.gov

Drawn up in accordance with the Food Standards Agency’s Framework Agreement (Amendment five, April 2010)

Approved by the Cabinet Member for Community Safety and Finance, Resources and Community Safety xxxxx 2011
Introduction

This is Southwark's food service plan focused on the food safety enforcement function. It covers all elements of food safety and hygiene for which the authority has enforcement responsibility. The Service Plan also covers objectives relating to non-enforcement activity, including food hygiene education/health promotion and partnership working.

The Service Mission statement for the whole of Environmental Health is included within this service plan, and the objectives are designed to reflect and contribute towards the achievement of the fairer future vision within the Council Plan, and the six key principles that underpin it.

The food service plan is an expression of the authorities commitment to the development of the food safety team and is now required by the Food Standards Agency (FSA); this plan follows the guidance in the Framework Agreement and follows the service plan template. Consistency in plan format enables the FSA to assess how we are doing and allows for local authorities to compare and contrast service plans for any fundamental performance reviews under the local government Best Value agenda.

David Littleton

Business Unit Manager Environmental Health & Trading Standards
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Section ONE – SERVICE AIMS AND OBJECTIVES

2. The environmental health and trading standards service mission statement is:
   ‘To enhance and protect the health, safety, economic welfare and environment for people and stakeholders in Southwark’
3. Aims and Objectives
4. In relation to food safety, it seeks to pursue this through a number of key aims objectives which include: -
   • To secure compliance with food safety law having regard to nationally issued official codes of practice and practice guidance documents particularly concerning the frequency of inspection;
   • To ensure that food is fit to eat and free from extraneous matter;
   • To maintain an accurate register of food businesses in the borough;
   • To increase the knowledge of food handlers and the general public about the principles and practice of food hygiene and healthy eating;
   • To carry out food hygiene inspections in accordance with the minimum inspection frequencies and to standards determined by the FSA;
   • To deal with food hazards in accordance with FSA guidance;
   • To investigate all notified cases of food-borne disease and take effective action to control the spread of infection.
5. Contributions to the Council Plan
6. In its council plan, Southwark council highlights its promises of what it will deliver as a council. It outlines the new relationship between the council and residents, built on trust, openness and transparency in all it does and absolute commitment to creating a fairer future for all.
7. The food team works to the Council’s medium term objectives and supports the council plan in the following areas:
8. Being more transparent – by following best practice as promoted by the Better Regulation Executive and the Hampton Review of regulatory inspections and enforcement. The service will be:
• Proportionate in activity intervening only when necessary and using remedies that are appropriate to the risk posed, and costs identified and minimised.
• Accountable and be able to justify decisions made and be subject to public scrutiny.
• Consistent and open and will try to keep regulations simple and user-friendly within the limitations of legislational requirements, which are often out of the control of the service.
• Targeted, and focused upon problems and minimising side effects.

9. **Creating a fairer borough** – by ensuring that Southwark continues to be a place where people are treated fairly and have the opportunity to get involved; by providing timely hygiene advice and regulation to local businesses and contributing to a level playing field locally.

10. **Making southwark a place to be proud of** - by assisting food related businesses through support, education and enforcement to improve and comply with hygiene standards, so improving quality of life now and for future generations for the people of Southwark making the borough a better place to live, work, invest in and visit.

11. **Realising potential** - by recognising that food is a key marker of social inclusion; that addressing diet, nutrition and food safety issues can impact on reducing health inequalities and incidences of food poisoning, the reduction of which has a positive impact on the community’s health. The team will continue to carry out educational and promotional activities as an integral part of their routine food safety inspections, as well as specialist activities targeting both consumers and businesses to promote food safety, better nutrition and healthy choices.

12. **Spending money as we would our own** – by continuing to employ new and modern ways of working to ensure our service is flexible, responsive, efficient and effective representing excellent value for money.

13. **Transforming public services** - by being committed to continuous improvement in service delivery, and addressing the needs of our communities by using our resources innovatively and to best effect.

14. **SECTION TWO - BACKGROUND**

15. **Borough Overview**

16. Alongside the City of London, Southwark is one of the oldest areas of London, with a history stretching back to Roman times. The borough is also one of the busiest and
most demanding metropolitan authorities in the country. It is a borough of
tremendous opportunity, situated as it is with its northern boundaries opposite the
prosperity of the cities of London and Westminster. But it also has all the challenges
and interest of an inner city area; low incomes, high state dependency and complex
social problems.

17. Southwark is undergoing one of the most ambitious social and physical regeneration
programmes of any authority in the country, together with a wide range of initiatives
aimed at improving educational standards, housing and the environment, reducing
crime and tackling health inequalities.

18. Southwark’s Profile

19. Southwark’s population reached 285,500 in 2010 and is believed to be growing by
as much as 4,000 per year, with a projected population of over 310,000 by 2016. The
population has a young demographic profile and demonstrates rich ethnic and
cultural diversity, with around one-third (90,600) of the population from black or
ethnic minority communities. Southwark is arguably one of the most diverse areas in
the capital.

20. Southwark is made up of eight very distinctive urban neighbourhoods that extend
along the river Thames and down into South East London. The borough also
encompasses some of London’s top attractions, creative hotspots, scenic villages
and acclaimed green spaces.

21. Southwark has a wide-range of leisure and cultural opportunities; and makes a
significant economic and employment contribution to the local community. The north
of the borough is recognized as one of London’s fastest growing tourist quarters and
a thriving business location.

22. Alongside the borough’s rich vibrancy, Southwark has its fair share of challenges.
The Index of Multiple Deprivation (IMD) 2007 shows Southwark as the 27th most
deprived local authority nationally and 60% of the borough’s wards are among the
10% most deprived in the country. Consequently, the borough faces many
challenges associated with meeting the complex health and social needs of an inner-
city population.

23. To meet our challenges, Southwark has a large number of physical regeneration
programmes across the borough, alongside a wide range of initiatives aimed at
improving educational standards, reducing crime and improving health, housing,
social care and the environment.
24. Organisational structure

25. Cabinet Member Structure
As part of the modernising Local Government Agenda, the Council has adopted a Cabinet style of Local Government, embracing a new Constitution and new Executive arrangements, based on a Leader and Cabinet model.

26. The current Cabinet consists of –

Leader of Council
Deputy leader of Council and cabinet member housing management.
Cabinet member for regeneration and corporate strategy
Cabinet member for health and adult social care
Cabinet member for transport, environment and recycling
Cabinet member for finance, resources and community safety
Cabinet members for children’s services
Cabinet member for equalities and community engagement
Cabinet member for culture, leisure sport and the Olympics

27. Directorate Organisation
A corporate management team led by the Chief Executive and strategic directors undertakes the day-to-day operation of the Council. Council services are currently provided by seven directorates covering all service functions.

28. The community safety and enforcement division, which includes the Environmental Health and Trading Standards Services, is situated in the Directorate of the Environment. The head of community safety and enforcement has delegated responsibility for all matters relating to food safety. Individual post holders have been given direct delegation to take any action and exercise functions in relation to the Food Safety and other relevant acts.

29. Team Organisation

30. The food safety team forms part of an amalgamated food safety and trading standards team and sits within the division’s environmental health and trading standards business unit. Food enforcement activities are carried out by environmental health officers within the food team; the structure of this team is provided in appendix 1;

31. SECTION THREE - SCOPE OF THE FOOD SERVICE

32. The food team is responsible for undertaking the following work activities:
• Carry out a programme of food hygiene and food standards interventions in accordance with the Food Safety Act 1990 Code of Practice;
• Investigate and resolve complaints about food and food hygiene/ food standards practices and procedures;
• Take informal or statutory action including the service of notices, food seizure, premises closure or prosecution (amongst other available actions) in accordance with our enforcement policy to secure ultimate compliance with food safety legislation;
• Identify and assess premises requiring approval in respect of specific food products or processes and to ensure that they are granted conditional or full approval as necessary;
• To ensure that all food premises located or trading within the Borough are registered, and to maintain an accurate database of food premises in the Borough. To record inspection information and enable performance data to be provided to the FSA;
• Receive and investigate all relevant Food Standards Agency Food Alerts for action and their updates as appropriate, and to communicate with business to disseminate relevant information concerning relevant food risks;
• To provide advice and assistance to businesses and consumers on food related issues through the local authority website and other media;
• Investigate incidences of food borne disease and take action, including liaison with other bodies such as the Health Protection Agency, to identify the source and prevent further infection;
• Implement the team’s food sampling programme (microbiological and compositional & labelling);
• Provision of guidance and advice on food law requirements and compliance to meet local needs;
• Provide and review systems and procedures in line with FSA Framework Agreement;
• To act as Home/Primary Authority and implement Service Level Agreements where appropriate;
• To publish the hygiene ratings for businesses through our ‘scores on the doors’ rating scheme ay : http://www.scoresonthedoors.org.uk/council/london-borough-of-southwark;
• Comment on proposed food legislation codes of practice and other official documents as necessary and as requested.
33. **Night-time Economy Team**

34. Approval was received to commence a night-time economy team within EHTS service comprising a multi-agency partnership. The team became operative in April 2011. The primary aim of the team is to address a range of community safety issues such as alcohol related violence, crime and disorder and anti-social behaviour associated with night-time trading operations in a target area of the Borough. However, it is well established that these occurrences invariably occurs on, or around food premises whose trading operations extend well into the night. These businesses are not likely to have received food law enforcement visits during such late trading hours and therefore, unregulated for such purpose.

35. The team consists of police, licensing officers, food safety officers, health and safety officers and wardens. Food safety officers will therefore be able to undertake official food control interventions on theses premises which, together with a range of other coordinated enforcement measures will secure needed improvements.

36. Food law Code of Practice requires that a food authority’s intervention programme should provide for food establishments operating at night, weekends or early hours of the morning to be subject to official controls at those times when they are open for business. The night time economy team provides the opportunity for the service to satisfy this requirement.

37. **Demands on the Food Service**

38. The authority has (at 1st April 2011) approximately 2826 food premises on its database that are subject to programmed food hygiene interventions. In addition to the premises registered on the database are a number of unregistered premises. It is the intention of the food team to ensure that details relative to all known food premises are kept up to date and that as new premises are identified that these are also added to the database. The team will also review and keep up to date the details relative to all food premises registrations. The authority is also mindful that this process will involve scrutiny of local newspapers, mail shots and internet searches. The authority will also respond to any credible information passed to it suggesting any rogue food activities within the Borough. The known food premises can be categorised in figure 1 below: -
39.

<table>
<thead>
<tr>
<th>Description</th>
<th>No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Producer</td>
<td>3</td>
</tr>
<tr>
<td>Manufacturer/Processors</td>
<td>51</td>
</tr>
<tr>
<td>Importers/Exporters</td>
<td>13</td>
</tr>
<tr>
<td>Distributors/Wholesalers/Transporters</td>
<td>50</td>
</tr>
<tr>
<td>Retailer</td>
<td>1039</td>
</tr>
<tr>
<td>Restaurants and Other Caterers</td>
<td>1670</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>2826</strong></td>
</tr>
</tbody>
</table>

Figure 1 Categories of known food premises

40. All food premises resident or trading within the borough are risk rated and their frequency for intervention purposes determined. In accordance with the Code of Practice the risk ratings attained reflect the frequency at which the next hygiene intervention should occur. These are highlighted in figure 2 below:

41.

<table>
<thead>
<tr>
<th>Risk Rating</th>
<th>Minimum Frequency of Inspection</th>
<th>Number of Premises Trading within the Borough.</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>6 monthly</td>
<td>9</td>
</tr>
<tr>
<td>B</td>
<td>Every 12 months</td>
<td>252</td>
</tr>
<tr>
<td>C</td>
<td>Every 18 months</td>
<td>1191</td>
</tr>
<tr>
<td>D</td>
<td>Every 24 months</td>
<td>439</td>
</tr>
<tr>
<td>E</td>
<td>Every 3 years</td>
<td>634</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>2826</strong></td>
</tr>
</tbody>
</table>

Figure 2 Risk rating profile of premises
42. **Service Hours**

43. The service is, presently, provided from The Chaplin Centre, Thurlow Street SE17 2DG. Personal contact may be made with the service between the hours of 9.00 a.m. and 5.00 p.m., Monday to Friday. Telephone contact is available 24 hours, 7 days a week via the Customer Service Centre (CSC) on 020 7525 2000 as is fax and email: food@southwark.gov.uk

44. A standby arrangement exists to respond to any food or infectious disease emergency occurring at evenings and weekends (out of hours) and this is accessed via the Council’s Emergency Duty Officer.

45. **Enforcement Policy**

46. We regulate the activities of food businesses through a mix of enforcement and advisory action. Our efforts are targeted at those in the food business community which present the greatest risk to consumers. The Authority has a documented food enforcement policy that sets out how the food service will deal with infringements of the legislation and will intervene to bring the operation back into compliance.

47. Southwark is a signatory to the enforcement concordat. This forms the core of the council’s current enforcement policy. The council’s enforcement policy can be found at: [http://www.southwark.gov.uk/site/scripts/google_results.php?q=enforcement+policy](http://www.southwark.gov.uk/site/scripts/google_results.php?q=enforcement+policy) Alternately a paper copy is available from the Chaplin centre.

48. **Food Strategy**

49. Both the FSA and DEFRA have published food strategies. The FSA Food Strategy 2015 (Updated March 2011) is particularly relevant to the work of the food team as delivery of the principal outcomes of the strategy lie almost entirely within the remit of the food team. The strategic objective being, “safer food for the nation”, comprises six priority outcomes;

- food produced or sold in the UK is safe to eat
- food producers and caterers give priority to consumer interests in relation to food
- imported food is safe to eat
• consumers have the information and understanding they need to make informed choices about where and what they eat

• regulation is effective, risk-based and proportionate, is clear about the responsibilities of food business operators, and protects consumers and their interests from fraud and other risks

• enforcement is effective, consistent, risk-based and proportionate and is focused on improving public health

50. Food 2030 is Defra’s UK national food strategy which was launched in January 2011. The strategy primarily addresses sustainable development through the following stated priorities.

• Enabling and encouraging people to eat a healthy, sustainable diet.

• Ensuring a resilient, profitable and competitive food system.

• Increasing food production sustainably.

• Reducing the food system’s greenhouse gas emissions.

51. The team has worked with the director’s office to develop Southwark’s Food Strategy within the above range of outcomes and priorities. The document has been passed to the Strategic Director for review after which it will be put before Members for approval. The food team has made every effort to ensure the content of the strategy is relevant to the needs of those who live or work within Southwark and to visitors to the borough and reflects the priorities within Southwark.

52. **Olympics 2012**

53. The 2012 Olympics in London will attract more visitors to the capital. While the Borough does not host any of the games, Southwark recognises the potential impact of the games on the local economy, infrastructure, the population and its services. The Cultural Olympiad is also being held on the South Bank and will impact on Southwark resulting in increased number of visitors to the Borough. With more people visiting the Borough, the food team anticipates the following:

• Increase in the demand for food supply;

• Increase in varieties of food supplied;
• Increase in the number new food businesses operations, particularly mobile traders and home caterers;

• Increase in ad hoc, unregulated food operations;

• Increased likelihood of the spread of infectious/communicable diseases, including incidences of food poisoning;

54. The service is working closely with all its partners, including the Public Service Operation Group (PSOG) to identify and access any available funding to secure necessary resources to optimise preparation for the games. The food team is working closely with the Chartered Institute of Environmental Health (CIEH) and the London Food Coordinating Group (LFCG) to ensure a consistent and well-coordinated London wide approach to food law enforcement during the games. A member of the team has been designated the role of Olympic Liaison officer and another is part of the Food – Enforcement and Compliance Management group organised by the CIEH.

55. In preparation for the events, Southwark food team will endeavour to focus on the following areas:-

• Education and training- for both food law enforcers and food business operators;

• Advice and auditing;

• Enforcing standards and legal requirements, and ensuring all unrated premises are inspected and risk assessed;

• Monitoring and providing active surveillance;

• Facilitating resolution of problems;

• Communicating with partners and stakeholders;

56. The Food Safety Premises Inspection Programme

57. Routine food hygiene interventions are focused on the highest risk premises as a top priority in accordance with the Food Law Code of Practice (England) June 2008) and other recognised guidance such as that issued by Local Government Regulation (LGR) (previously LACORS).
58. Officers will determine the intervention frequency using the risk-rating scheme defined in the Food Law Code of Practice (England) (June 2008). The risk rating profile of premises is shown in Figure 2 above. High-risk premises (‘A’ and ‘B’ rated) may include larger premises such as manufacturers and those which cater to a high number of vulnerable clients with a poor standards of compliance. Medium-risk premises (‘C’ and ‘D’ rated) include the majority of take-aways, cafes and restaurants and a range of other retailers. Low-risk premises (‘E’ rated) often include newsagents, and other small retail shops selling mainly pre-wrapped shelf stable foods which are inherently low risk in nature. Interventions at E rated premises fall within the ‘Alternative Enforcement Programme’ (AES).

59. The priority for inspection for 2011-12 are the high risk premises (Category A & B), new unrated premises and overdue and due non compliant category C premises. Home authority premises and approved premises not falling within the classification described above will also be prioritised.

60. To focus resources where most improvement is required, we have not set a target for the due and overdue inspections for category ‘D’ and ‘E’ premises. Instead they will be sent a questionnaire enquiring as to various standards and practices in place. However, these premises will be inspected at every other planned intervention. This has the effect of legitimately reducing the burden on lower risk premises and on the service. This is in line with the Food Safety Code of Practice and is a system conducted successfully by other authorities. In adopting this scheme the authority is mindful that it will be necessary to verify the information received otherwise it may not come to the correct conclusions regarding risk in these premises. The authority will therefore carry out random inspections on a sample of premises where questionnaires have been returned. The Authority will also inspect any premises not returning their questionnaire.

61. The number of programmed food hygiene interventions programmed for 2011/12 is shown in figure 3 below: -
<table>
<thead>
<tr>
<th>Risk Rating</th>
<th>Min Frequency</th>
<th>No of Premises</th>
<th>No of Inspections</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Every 6 months</td>
<td>9</td>
<td>18</td>
</tr>
<tr>
<td>B</td>
<td>Every Year</td>
<td>252</td>
<td>252</td>
</tr>
<tr>
<td>C</td>
<td>Every 18 months</td>
<td>1191</td>
<td>324</td>
</tr>
<tr>
<td>D</td>
<td>Every 24 months</td>
<td>439</td>
<td>158</td>
</tr>
<tr>
<td>E</td>
<td>Every 36 months</td>
<td>634</td>
<td>0</td>
</tr>
<tr>
<td>Unrated</td>
<td>Within 28 days</td>
<td>Circa 301</td>
<td>301</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Total</strong></td>
<td><strong>2826</strong></td>
</tr>
</tbody>
</table>

Figure 3: planned food hygiene interventions

62. Food standards inspections will be carried out in association with hygiene inspections frequency. If the hygiene inspection is not due the standards inspection will not be carried out until the hygiene inspection becomes due.

63. In addition to routine hygiene inspections, food standards inspections are also carried out at the same time (if the standards inspection is due within a reasonable period of time). This approach allows the team to make the best value of resources and to reduce the inspection burdens on businesses.

64. Inspections of Imported Food

65. The Food Standards Agency requires Local Authorities to include inspection of imported food during routine food hygiene interventions. This activity is included in the calculations and will form part of the overall inspection process. There are currently no border inspection posts, enhanced remote transit sheds or importing
agents in Southwark but officers will routinely look for any food imports during routine visits to check traceability and fitness for consumption.

67. Inspection Revisits

68. Planned revisits will be undertaken to all premises risk rated A or B which are not considered 'broadly compliant' with food hygiene law i.e. those showing elevated risk in the areas of hygiene, structure or confidence in management.

69. In the case of category ‘B’ premises, revisits will not be routinely undertaken where the premises fall within this classification because of the addition of a vulnerable risks score. (this applies to operations such as residential care homes).

The majority of Category ‘C’ premises are not expected to be revisited as they are all likely to be broadly compliant with food law. However, dependent on the nature of contravention identified at the time of inspection, a revisit may be necessary. This will be determined on a case by case basis.

70. Non Programmed Inspections

71. It is estimated that there will be approximately 250 new businesses requiring inspections during 2011/12.

72. Food and Food Premises Complaints

73. The Service seeks to investigate all food complaints with a first response within the target period of 3 working days. It is estimated that there will be approximately 1000 food complaints received during 2011/12. The Service seeks to investigate all complaints about food premises and food hygiene practices with a first response within the target period. It is estimated that there will be 600 complaints of food hygiene nature.

74. EC Approved Premises

75. Regulation EC 853/2004 requires wholesale businesses that handle, store or produce products of animal origin to be approved by the local authority and be issued with an EC approval number. With the exception of catering butchers, responsibility
for the approval and inspection of such premises rests with the local authority. The list of approved premises is published on the FSA website. The EC Commission annually arranges audits of selected approved premises in member states of the EC to ensure that the controls are being applied and implemented by local authorities to a satisfactory standard. To date no premises in Southwark have been selected for audit.

76. There are 15 premises currently approved and listed below; it is likely that more premises will be subject to the approval process during the year.

- Aberdeen Seafoods
- Mons Ltd
- Neal’s Yard Dairy
- The New Deal Sausage Co. Ltd.
- G.M Boyer
- Direct Seafoods
- Cyprus Pastries
- The Franconian Sausage Company
- Red Sun
- Southbank Frozen Foods
- Baboo Meats
- Kappacasein
- Ham & Cheese
- Enos Kitchen
- Tightend Ltd.

77. **Primary Authority Scheme and Home Authority Principle**

78. Primary Authority gives companies the right to form a statutory partnership with a single local authority, which then provides robust and reliable advice for other councils to take into account when carrying out inspections or dealing with non-compliance. The Council endorses this approach to food safety.
79. Since the introduction of the scheme in 2009 no primary authority partnerships have been formed, however, it will actively explore such arrangements where suitable candidates are identified.

80. The home authority principle runs alongside the primary authority scheme. We currently act as Home Authority for Davy's wine importer and restaurant/wine bar chain and act in an informal capacity with a number of businesses in the borough with whom we have no formal agreement including EC approved premises (see below) and including:

- South London and Maudsley NHS Foundation Trust
- Leathams Larder
- Divine Chocolate
- Monmouth Coffee

81. **Advice to Businesses**

82. Although there is no statutory requirement for authorities to offer free advice to businesses the Service encourages food businesses to seek advice as it encourages levels of compliance. It is preferable to resolve problems through co-operation at an early stage before the situation becomes serious, when formalised enforcement action may have to be considered. The ‘Hampton Report’ entitled ‘Reducing administrative burdens: effective inspection and enforcement 2005’ states that; “We expect local authority enforcers to adopt a balance of techniques and approaches in order to ensure the safety and wellbeing of the public and of the environment and not to rely on any one method.

83. We believe that assisting compliance is every bit as important as detecting noncompliance”. This Service then would like to be perceived by food businesses as supportive and helpful and it actively seeks to give this intention.

84. In 2011 the Food Standards Agency published the; ‘E.Coli 0157 Control of Cross Contamination’ guide providing critical information for food business operators and enforcement authorities. The guide aims to increase recognition of the threat of E.coli and identifies the need to have stringent measures in place to prevent transmission. It sets out controls in circumstances where food may be
contaminated and is handled in the same establishment as ready-to-eat food. Given that very serious outbreaks and fatalities have been associated with this organism it is the intention of this service to draw businesses attention to this important guidance. The team will engage with those businesses most likely to be affected by the guidance at the time of inspection and provide necessary advice and support. The team will also ensure all officers benefit from the related training the FSA has since developed.

85. Food Sampling

The Service participates in the food sampling programmes, with other local authorities and external partners including the Public Analyst, Health Protection Agency (HPA), Food Standards Agency (FSA) and LGR.

86. The Service intends carrying out approximately 200 targeted sampling exercises which include a specially FSA grant-aided scheme. Further routine programmed samples are expected to be undertaken in 2011/12 by officers but it is difficult to quantify the amount at this time. In addition, reactive food sampling will also be carried out in respect of food complaints and other suspect food items.

87. Where any samples are found to be unsatisfactory they will be followed up by written communication with the food business and a further inspection or sampling undertaken as necessary in order to improve standards.

88. Control and Investigation and Recording of Outbreaks and Food Related Infectious Disease

90. The Service is expected to respond promptly as an overriding priority to the notification of communicable diseases especially where the source could be food or water borne and to take action to investigate and attempt to control spread.

91. Southwark’s response is set out in an outbreak control plan document, which is a policy for community outbreaks involving the populations of the London Boroughs of Bexley, Bromley, Greenwich, Lambeth, Lewisham and Southwark.

92. Officer response should be according to an initial professional assessment of urgency based upon the information available, but in any event no longer than the response period determined in the targets section. Officers are also required to liaise with the CCDC and the Health Protection Agency.
The service also has statutory responsibility for officially receiving and recording formal notifications of infectious disease occurrences in the borough. This role is primarily discharged by one member of the team working in close partnership with the Health Protection Unit (HPU) and sector partners. On average, the team deals with over 500 notifications each year. However, although the trend indicates an annual gradual reduction, it likely that, as London moves closer to the Olympic games, there might be an increase in ID occurrences and related notifications during 2011/12 and into the early part of 2012/13.

For infectious disease notifications, a response is expected for 95% of enquiries within one day and 100% within two days.

**Food Safety Incidents and Requests**

The procedure followed in respect of food alerts, recall information notices and updates is in accordance with Food Safety Act 1990 Code of Practice. The Service receives these notifications and other information by electronic mail directed to an inbox dedicated to the FSA for these purposes. The team also has access to the Environmental Health Computer Network (EHC Net) to allow the exchange of information, intelligence, queries and share technical data. The FSA is likewise provided with the contact number of the authority which can be contacted out of hours where necessary.

The service receives around 850 service requests per year. Those relating to food safety incidents are responded to on a risk assessed basis.

An initial response to all service requests is expected within 3 days; however, the team aims to provide a response to at least 80% of enquiries within 24 hours and all requests of an urgent nature within that time.

**Liaison with Other Organisations**

The food safety team maintains a number of liaison arrangements to ensure its enforcement activities are continually reviewed in a wider context and that its approach is consistent with other enforcement services within the Council and nationally where appropriate.

Liaison arrangements exist as follows:

- Control of Infectious Disease in partnership with HPU/HPA
• Communicable Disease Action Group (Local Authorities + Director of Public Health & others)

• Environmental Health Working Group (Local Authorities + CCDC)

• London Food Coordinating Group (LFCG) - Food Hygiene & Food Standards

• London South East Sector Food Liaison Group (Local Authorities + HPA+ Public Analysts)

• Food Hygiene Focus Group (LGR, FSA, Health Protection Agency and Environmental Health representatives from each region in the UK)

102. Food Safety Promotion

103. The Food Safety Team provides information on the Council’s website which enables residents and food businesses to view the services available and to download relevant forms including that for business registration. and approval.

104. The Service responds to changes in legislation and current concerns about food by educating proprietors during officer visits and by sending out mail shots.

105. The Service sign posts food business operators directly to the FSA to obtain Safer Food Better Business manuals where considered appropriate for that businesses. These are free of charge. and where appropriately used and put into practice, may satisfy the legal requirement of providing a food safety management system based on Hazard Analysis, Critical Control Points (HACCP).

106. Conflicts of Interest

107. For Services provided by Environmental Health - the food safety code of practice requires food authorities to ensure that officers are always aware of Food Service Plan 2011/12, potential conflicts of interest that can arise in enforcement situations through promotions of its own food authority's services. This is not an issue for Southwark, no chargeable services are currently offered.
108. SECTION FOUR: RESOURCES

109. Following a service review and reorganisation of the community safety and enforcement division, resources have been reduced by 8% (against a background of a 40% reduction across the wider Division). From 1 April 2011 the team has 10 staff dealing with food safety matters. There are 2 vacant posts which, the service intends to fill at the earliest opportunity subject to available funding. Administrative support is provided by 1 member of staff.

110. Financial Allocation

111. The financial allocation for 2011/12 is shown in figure 4 below:

<table>
<thead>
<tr>
<th>BUDGET</th>
<th>£1000’s</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salaries</td>
<td>630</td>
</tr>
<tr>
<td>Running costs</td>
<td>55</td>
</tr>
<tr>
<td>Recharge</td>
<td>-</td>
</tr>
<tr>
<td>Total</td>
<td>685</td>
</tr>
<tr>
<td>Income</td>
<td>6</td>
</tr>
<tr>
<td>TOTAL</td>
<td>691</td>
</tr>
</tbody>
</table>

Figure 4: Food safety team budget

112. The Food Team is the 3rd cheapest compared with our inner London family group of 13 Boroughs. Against this background benchmarking demonstrates that the food team was in the upper quartile compared with the 13 inner London Boroughs in respect of, food hygiene notices served, Emergency Prohibition notices served, Summonses and cautions

113. Staffing Allocation

114. Staffing allocation for all food law enforcement is given in figure 5 below:
<table>
<thead>
<tr>
<th>Designation</th>
<th>Number in post</th>
<th>Number of Vacancies</th>
<th>Competencies Necessary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit Manager</td>
<td>0.5</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Team Leaders</td>
<td>1</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Principal Environmental Health Officers</td>
<td>5</td>
<td>1</td>
<td>High Risk Food premises Inspection, Food Standards Inspections, Closure of Food Premises, Approval of Food Establishments</td>
</tr>
<tr>
<td>Principal Enforcement Officers</td>
<td>1</td>
<td>0</td>
<td>High Risk Food Premises Inspection, Food Standards Inspections, Approval of Food Establishments</td>
</tr>
<tr>
<td>Enforcement Officers</td>
<td>1</td>
<td>1</td>
<td>High, medium and low risk food premises inspection depending on experience, Food Standards Inspections</td>
</tr>
<tr>
<td>Enforcement and Infectious Disease Officer</td>
<td>1</td>
<td>0</td>
<td>Public Health/ Infection control and some general enforcement work to include, food hygiene and food standards inspections.</td>
</tr>
<tr>
<td>Unit Support Officers</td>
<td>1</td>
<td>0</td>
<td>Administrative support - Fixed Term Contract</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>10.5</strong></td>
<td><strong>2</strong></td>
<td></td>
</tr>
</tbody>
</table>

Figure 5 Staffing Allocation

115. **Staff Development Plan**

116. The council is Investors in People (IIP) employer.

117. Training needs of each staff member is documented through the performance management process and recorded on each individuals work plan and on an excel spreadsheet held centrally.
118. Staff involved in food enforcement work are required to hold an approved formal qualification as detailed in the food safety statutory code of practice. The Food Standards Agency also suggests that each food officer receives ten hours training each year as a minimum to maintain competency. The service ensures this by using:-

- In house documented competency based training
- Participation in relevant external learning and development courses
- Regular review against the service’s own performance management learning and development scheme.

119. In addition, the Chartered Institute of Environmental Health (CIEH), requires its members to undertake twenty hours of training each year as part of the Continuing Professional Development (CPD) scheme.

120. SECTION FIVE –QUALITY ASSESSMENT

121. Monitoring measures are in place to assess performance, particularly having regard to the number of visits carried out on a month by month basis and is monitored by the business unit manager of EHTS. The main means by which quality is assessed is as follows:

- Monitoring and support provided by experienced principal enforcement officers
- Periodic monitoring by team leader; includes accompanied audit visits and associated procedures
- Monitoring of notices and letters
- Shadow inspections
- Post inspection audits of records and enforcement decisions
- Regular team meetings
- Regular Technical Meetings
- Regular one-to-one work reviews

122- SECTION SIX - REVIEW

123. Review Against the Service Plan

124. Under the current performance management framework service plans
include a number of targets and performance indicators. During the course of the year Environmental Health formally monitors its performance against targets and on a monthly and quarterly basis. Performance indicators in relation to the food safety service delivery will be reported to the Director of Environment every month.

125. Appendix 2 highlights the performance against the 2010-11 Plan.

126. Identification of any Variation From the Service Plan.

127. The performance levels for inspections during the period 2011/2012 will be reported at year end.

128. Areas of Improvement

Areas of improvements and challenges for 2011-12 and beyond are:

- To inspect 100% of the high-risks, category A and B premises;
- 100% of the unrated premises and 100% of not broadly compliant category C premises;
- To successfully recruit to the two vacant food safety officer posts to assist us in meeting our targets;
- To maximise officer’s involvement in the delivery of hygiene inspections as compared to last period through changes in service delivery.
- To work with businesses to increase the number of premises that have documented food safety management systems in place, by utilising a range of actions and interventions to assist in compliance.
Appendix 1: Organisational Chart showing the food safety team

Food Safety Team

Gill Davies
Director Environment and Leisure

Jonathon Toy
Head of Community Safety and Enforcement

David Littleton
Business Manager
Community Safety Enforcement

Sally Slade
Unit Manager
Food Safety and Trading Standards

Paul Gander
Team Leader
Trading Standards

Earl Legister
Team Leader
Food Safety & Infectious Disease Control

Justin Miller
Team Leader
Quality

Linda Cook
Senior Unit Support Officer

Matthew Bourne
Senior Unit Support

David Baachas
Principal Enforcement Officer

Heather Cowley
Principal Enforcement Officer

Evelyn Mafunga
Principal Enforcement Officer

Faridah Omar-Ali
Principal Enforcement Officer

Bernadette Johnson
Enforcement Officer

Joyce Oyelle-Ogaba
Enforcement Officer

Enforcement Officer
open position

Rod Blesalit
Principal Enforcement Officer

Kevin Cox
Principal Enforcement Officer

Fardah Omar-Ali
Principal Enforcement Officer

Sally Slade
Unit Manager
Food Safety and Trading Standards

David Littleton
Business Manager
Community Safety Enforcement

Jonathon Toy
Head of Community Safety and Enforcement

Gill Davies
Director Environment and Leisure

Food Safety Team
### Food Team 6-Year Performance (Chartered Institute of Public Finance and Accountancy Returns)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of service requests</td>
<td>1,120</td>
<td>1083</td>
<td>993</td>
<td>840</td>
<td>849</td>
<td>871</td>
</tr>
<tr>
<td>Number of hygiene inspections carried out</td>
<td>1,270</td>
<td>1526</td>
<td>1101</td>
<td>1235</td>
<td>1113</td>
<td>1981</td>
</tr>
<tr>
<td>Number of written warnings</td>
<td>888</td>
<td>1081</td>
<td>1090</td>
<td>917</td>
<td>789</td>
<td>1276</td>
</tr>
<tr>
<td>Number of hygiene improvement notices served</td>
<td>266</td>
<td>248</td>
<td>198</td>
<td>152</td>
<td>114</td>
<td>99</td>
</tr>
<tr>
<td>Number of hygiene emergency prohibition notices served</td>
<td>6</td>
<td>4</td>
<td>3</td>
<td>6</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>Number of prohibition orders served</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Number of summonses served and simple cautions</td>
<td>218</td>
<td>182</td>
<td>123</td>
<td>169</td>
<td>53</td>
<td>60</td>
</tr>
</tbody>
</table>

### Food Hygiene Inspection Programme 2010-11

<table>
<thead>
<tr>
<th>Risk category</th>
<th>Planned Target</th>
<th>Revised * target</th>
<th>Total achieved</th>
<th>Percentage achieved</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>24</td>
<td>32</td>
<td>32</td>
<td>100</td>
</tr>
<tr>
<td>B</td>
<td>242</td>
<td>197</td>
<td>197</td>
<td>100</td>
</tr>
<tr>
<td>C</td>
<td>184</td>
<td></td>
<td>643</td>
<td>349%</td>
</tr>
<tr>
<td>D</td>
<td>0</td>
<td></td>
<td>184</td>
<td></td>
</tr>
<tr>
<td>E</td>
<td>0</td>
<td></td>
<td>54</td>
<td></td>
</tr>
<tr>
<td>F</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Unrated</td>
<td>503</td>
<td>447</td>
<td>469</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>953</td>
<td>1579</td>
<td>166%</td>
<td></td>
</tr>
</tbody>
</table>

*The planned target is revised at the end of the year to take into account premises that were due for inspection that had ceased trading during the year. It also accommodates category A premises introduced into the inspection programmed as a result of changes from another risk category.*
### Food standards inspection programme 2010-2011

<table>
<thead>
<tr>
<th>Category</th>
<th>Total Achieved</th>
</tr>
</thead>
<tbody>
<tr>
<td>A (high)</td>
<td>7</td>
</tr>
<tr>
<td>B (medium)</td>
<td>338</td>
</tr>
<tr>
<td>C (low)</td>
<td>461</td>
</tr>
<tr>
<td>Unrated</td>
<td>506</td>
</tr>
<tr>
<td>Total</td>
<td>1312</td>
</tr>
</tbody>
</table>

### Food service requests 2006 – 2011

<table>
<thead>
<tr>
<th>Category of Service Request</th>
<th>06/07 Actual</th>
<th>07/08 Actual</th>
<th>08/09 Actual</th>
<th>09/10 Actual</th>
<th>10/11 Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Food Hygiene/Safety</td>
<td>531</td>
<td>439</td>
<td>603</td>
<td>594</td>
<td>587</td>
</tr>
<tr>
<td>Food Standards</td>
<td>150</td>
<td>131</td>
<td>70</td>
<td>87</td>
<td>139</td>
</tr>
<tr>
<td>Infectious Disease Investigations</td>
<td>256</td>
<td>252</td>
<td>623</td>
<td>150</td>
<td>189</td>
</tr>
<tr>
<td>Licensing Applications / Registrations</td>
<td>80</td>
<td>85</td>
<td>77</td>
<td>84</td>
<td>94</td>
</tr>
<tr>
<td>Miscellaneous*</td>
<td>86</td>
<td>111</td>
<td>84</td>
<td>52</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>1,017</td>
<td>993</td>
<td>1,484</td>
<td>999</td>
<td>1061</td>
</tr>
</tbody>
</table>

* includes food alerts, export certificates, referrals to other agencies.