

Food Safety Service Plan 2009 – 2010

Appendix 1

Food Safety Service Plan

2009-2010

This Service Plan is produced to comply with the requirements placed on the London Borough of Southwark by

“The Framework Agreement on Local Authority Food Law Enforcement”

issued by the Food Standards Agency

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Introduction

This is the food service plan (the plan), dedicated to the food law enforcement that is the responsibility of the food and trading standards service (FTS) by virtue of the provisions of the Food Safety Act 1990 and EU Regulations.

The plan is a comprehensive document, covering food hygiene, food standards and associated issues. The trading standards service deals with issues concerning the Agriculture Act such as controls on feeding stuffs.

The plan is set out in accordance with the requirements contained within the framework agreement on authority food law enforcement, published by the Food Standards Agency.

The plan will be submitted to the executive member for agreement through the individual decision making process (IDM). When approved it will be published on the Southwark web site www.southwark.gov.uk

1.0 Service aims and objectives

1.1 Aims and objectives of community safety and enforcement

The over arching aim of the Southwark Alliance is:

To make Southwark a world class quarter of a world city

Community safety and enforcement is committed to deliver against this vision and will:

Continue to provide a clean, safe and healthy environment for everyone who lives, works or visits our borough

1.2 Southwark 2016 - Sustainable Community Strategy – a vision for Southwark

‘Southwark 2016: Sustainable community strategy’ and the 3 year Corporate Plan 2009-2011 set out the vision and priorities for Southwark and guides the work of all statutory agencies in the borough, as well as partners in the voluntary, faith and business sectors.

Both the Community Strategy and the Corporate Plan can be found at: <http://www.southwark.gov.uk/YourCouncil/keydocuments/corporateplan.html>

The key priorities of Southwark 2016 are identified below and the food safety service aims to incorporate the ethos of these corporate priorities into its service plan. The key areas are

Improving individual life chances

For Southwark's people to:

- Achieve economic well-being
- Achieve their educational potential
- Be healthy
- Stay safe

Making the borough a better place for people

A place that has:

- Localities of mixed communities
- Sustainable use of resources
- A vibrant economy
- A liveable public realm

Delivering quality public services

With public services that are:

- Accessible and integrated
- Customer focused
- Efficient and modern

1.3 Contributions to the Corporate plan

Achieve economic wellbeing

- We will ensure our services and facilities are accessible to all, regardless of income.
- We will regulate the marketplace and enforce the law, by carrying out targeted inspections, audits and sampling programmes, investigate complaints and carry out formal action.
- We will work on a neighbourhood level to ensure deprived neighbourhoods enjoy the same food and nutrition standards as the rest of the borough.
- We will work in partnership and fully support Southwark's businesses, in particular BAME businesses, through efficient provision of advice and service responses
- We will maintain the 'scores on the doors' website

Achieve educational potential

- We will begin to look at ways of targeting our work around food standards and hygiene to enrich the curriculum through partnership working with schools and young people
- We will advise and educate consumers of their rights as purchasers of goods and services
- We will participate in national campaigns such as Food Safety Week

Be healthy

- We will ensure foods are labelled and represented correctly and promote good nutritional standards
- We aim to identify and work with stakeholders and partners on issues relating to healthy lifestyles and reducing health inequalities
- We will continue to work with Healthy Southwark partners to ensure the provision of safe, hygienic and nutritionally balanced school dinners to school age children in the borough

Stay safe

- We will ensure safe standards of food hygiene within high and medium risk food premises
- We will continue to introduce food management systems such as Safer Food Better Business (SFBB)
- We will endeavour to prevent the spread of infectious/ communicable diseases and curtail such occurrences by promptly investigating as appropriate, any such cases notified to us. This will be achieved through close partnership working with the Health Protection Unit and other related organisations.
- We aim to reduce incidences of food poisoning and food-borne illnesses through regular hygiene inspections and education of food handlers. We will work with the Food Standards Agency (FSA) to provide to food business operators and residents, advice on the safe handling of food.
- We will continue to provide an out of hours' rota to respond to any food safety and infectious disease emergencies

2.0 Background

2.1 Borough overview

Southwark is 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.

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.

2.2 Local authority profile

In the IMD 2007 Southwark is the 26th most deprived district in England (was 17th in 2004) and the 9th most deprived borough in London improving from 6th in IMD 2004.

The total population is 269,2000 and is expected to rise to 312,300 by 2016. The population density is 84.86 persons per hectare compared with 45.62 per hectare in London.

The borough has an increasingly young age profile. The proportion of residents of working age has risen and is well above the London average while the proportion of residents over 65 is low, 9.4% as compared with 11.8% in London.

The proportion of the black and minority ethnic population has continued to rise and now represents 37% of the population and the black african group has almost doubled in 10 years.

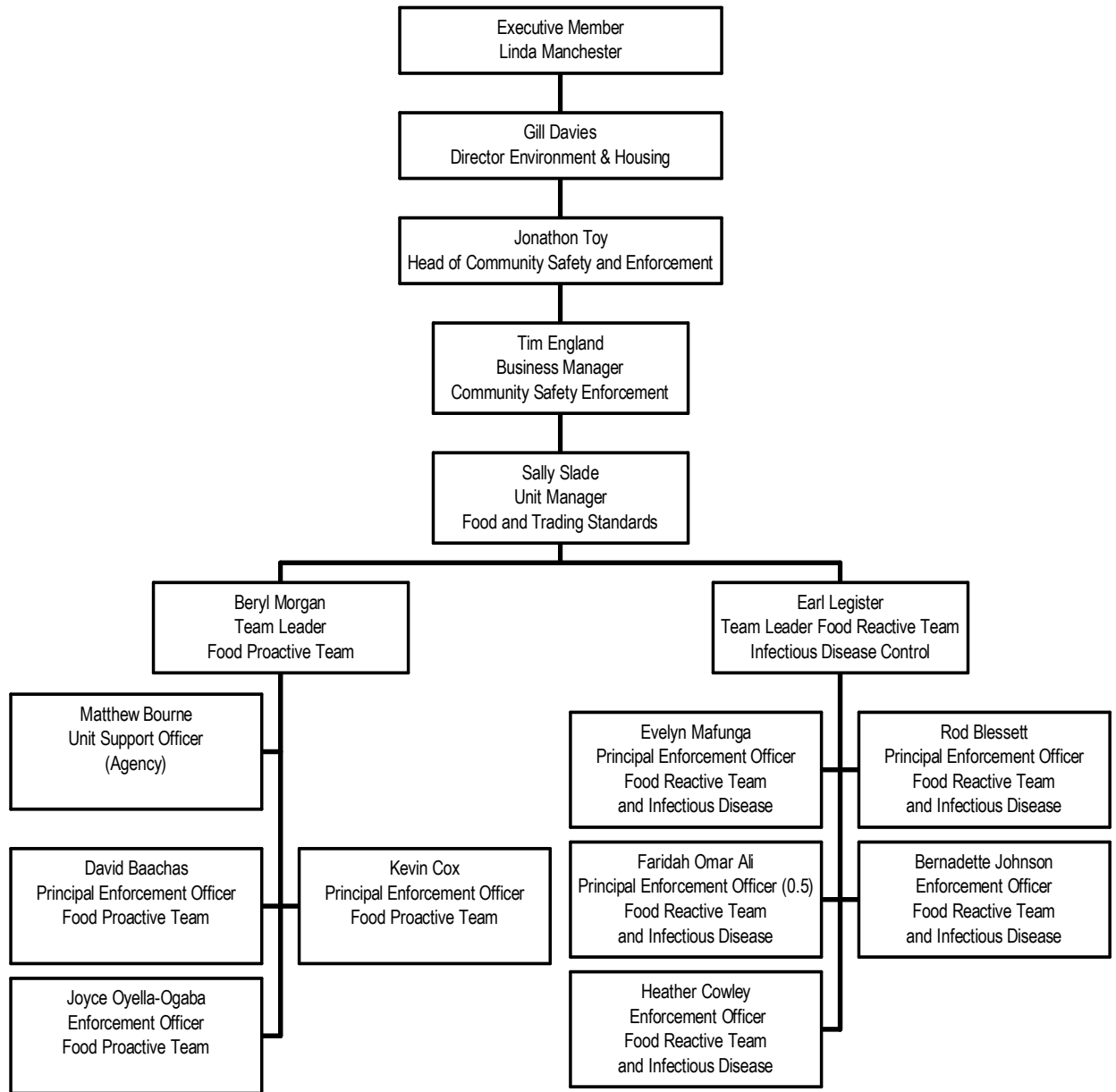
The proportion of disabled residents has risen, despite a younger age profile.

Southwark has the highest level of council and social landlord tenancies in London with 47.8% as at April 2007.

2.3 Organisational structure

A chart showing the organisational structure of the food safety team and its position within the council structure is given below. Additionally in Section 4 is a table which identifies the specific responsibilities of the food enforcement officers and an indication of their qualifications and competence to carry out their identified functions

Food Safety Team



The food safety team is a part of the food safety and trading standards service. It sits within the community safety enforcement business unit: the main regulatory arm of the community safety and enforcement division.

The team has 9.5 staff who deal with food safety enforcement matters. Two posts which were held against savings last year remain unfilled. There are, in addition, 11.5 staff in the trading standards team with 2.5 vacancies. Administrative support comprises 1.75 staff.

2.4 Scope of the food service

Food hygiene and food standards law is enforced through programmed inspections of risk assessed businesses; advice to businesses; sampling of

food and food ingredients at manufacturers, importers, wholesalers and retailers; and by investigating complaints.

Infectious disease investigations are undertaken to help prevent spread of disease within the community.

A reduction in core funding for the vacant posts has meant that work must be prioritised and all the inspections due will not be achieved. The inspection targets have been set as category A or B high risk businesses, new businesses that have not been inspected previously and category C medium risk businesses. Priority will be given to category C businesses that are not broadly compliant, followed by those that are overdue for inspection, the number achieved being dependant on resources. Our complaints target is to investigate 75% of all complaints. These will be triaged and prioritised by the reactive team leader. We will also investigate all instances of food poisoning. We are currently consulting with staff on the best way to manage staff resources, bearing in mind the outcomes and recommendations of the **Pennington Report** (see Chapter 18 of the full report.)

Other key areas of work include;

Introducing food safety management systems such as Safer Food Better Business (SFBB); sampling – microbiological and standards; health promotion and key council priorities of nutrition, healthy weight and health inequalities.

Seeking external funding sources; we have successfully bid for a Food Standards Agency (FSA) grant for additional targeted sampling.

Continuing to develop links with Healthy Southwark partners; Healthy Southwark is the health improvement and public health partnership board which leads the implementation of *Choosing Health* the Government white paper on health, the key aims of which are: tackling health inequalities; reducing the number of people who smoke; tackling obesity; improving sexual health; improving mental health and well-being; reducing harm and encouraging sensible drinking. The partnership is responsible for managing the LAA targets on health.

Analytical services for all sampling related to hygiene or standards are provided by Eurofins public analyst (PA) service, the appointed PA for the purposes of the FSA, and the Health Protection Agency (HPA).

2.5 Demands on the food service

The current premises profile of all food premises in Southwark is given in the table below.

Description	No.
Producer	1
Manufacturer/Processors	27

Packer	2
Importers/Exporters	11
Distributors/Wholesalers/Transporters	36
Retailer	969
Restaurants and Other Caterers	1619
Manufacturers selling by retail	21
Total	2686

The service is 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.)

A standby arrangement exists to respond to any food or infectious disease emergency occurring at evenings and weekends and this is accessed via the Council's Emergency Duty Officer.

2.6 National and Local Changes – the year ahead

Performance Indicators

NI 120 – All age, all cause mortality. The performance target for 2011 is 676 per 100,00 (men) and 441 per 100,000 (women). (LAA)

NI 184 – The percentage of food establishments in the area which are broadly compliant with food law. 'Broadly compliant' is an output measure which the Food Standards Agency has developed to monitor the effectiveness of the regulatory service relating to food law. The outturn for 2008-09 was 70%. Before a meaningful target is determined the figure will be monitored throughout 2009-10 to identify how it is affected by new premises and ownership changes. (LAA)

NI 182 – The percentage of business customers of regulatory services who respond that they have been treated fairly and / or the contact has been helpful. The term 'regulatory services' corresponds to local authority core functions of trading standards, environmental health and licensing. NI 182 - Results for 2008-09 have been calculated at 79% business satisfaction with the council's regulatory services i.e. Trading Standards, Environmental Health and Licensing. This was measured by surveying businesses that we have inspected or investigated with regard to whether they felt they were treated fairly and whether the contact was helpful. (LAA)

Food businesses which have a documented food safety management system. The FSA target is 85% premises to be fully compliant by 2010. The current figure in Southwark is 24% premises fully compliant. We hope to improve on this during the course of our inspection programme but we will be focussing our attention on businesses that present the greatest risk rather than on premises that are broadly compliant but not yet fully compliant.

The Pennington report

The Pennington Report was published following the public inquiry into the September 2005 outbreak of e.coli 0157 in South Wales. The inquiry's findings have raised several issues for regulatory and enforcement bodies responsible for enforcing food hygiene regulations in food businesses.

A summary of the main findings are:

For Local Authority enforcers:

1. Closer scrutiny by the FSA of how local authority food enforcement officers undertake hygiene inspections
2. Sufficient resources to be put into ensuring HACCP approach is understood by all food business operators and an effective documented system in place and reflected in the working culture and practices.
3. Regulatory and enforcement bodies should keep the choice of 'light touch' enforcement for individual food businesses under constant review.
4. The inspection of HACCP plans must be audit-based
5. Training provision should be developed to ensure that all officers who check HACCP – based plans, including those responsible for overseeing the work of those officers have the necessary knowledge and skills
6. Environmental Health Officers should obtain a copy of a business's HACCP/food safety management plan at each inspection, which should be held on the business's inspection file
7. A system of logging issues, concerns or potential problems, whether by 'red flagging' specific documents or by file notes, should be standard practice
8. Decisions about confidence in a business's management of food safety should be evidence based.
9. All inspections, primary and secondary, must be unannounced unless, exceptionally, there are specific and justifiable circumstances or reasons why a pre-arranged visit is necessary
10. Discussion with employees must be a standard part of food hygiene inspection visits

The above will require more detailed involvement with food businesses if significant progress is to be made implementing the recommendations of the inquiry. Naturally, this has a direct impact on available resources and the level of output that can be achieved. It is therefore imperative, that careful

consideration is afforded to the level of resources available to deliver the functions of the service.

For food businesses:

1. All food businesses must ensure that their systems and procedures are capable of preventing the contamination or cross contamination of food with E.coli 0157
2. Food business must get to grips with food safety management based very clearly on the seven key HACCP principles, ensuring it is a core part of the way they run their business
3. Additional resources should be made available to ensure that food businesses understand and use the HACCP approach and have in place an effective, documented, food safety management system which is embedded in working culture and practice
4. The principles underlying the Butcher's Licensing Scheme, which was introduced in response to the 1996 E.coli 0157 outbreak, should guide food hygiene measures in businesses processing raw meat and unwrapped ready-to-eat foods

And for schools:

1. Businesses contracting for the supply of high-risk foods, such as raw and cooked meats, to public sector organisations must be subject to independent food hygiene audits
2. Every LA should have a programme of audits to ensure that all schools have adequate toilet and hand washing facilities

The Regulatory Enforcement and Sanctions (RES) Act 2008 and Regulators Compliance Code

The government introduced this code with the aim of helping businesses save time and money by improving the way that regulators work with them.

It requires regulators to take a risk-based approach to inspection and enforcement. This means fewer inspections and less regulatory burden for the majority of compliant businesses, but more rigorous inspection when there is high risk of a business not complying with regulation.

There is a requirement that we have regard to this Code when determining any policy or principles that concern the way we exercise our functions and businesses can challenge regulators through Judicial Review if it is not followed Code.

The Code is based on the findings of the Hampton Report that enforcement of regulation should be risk-based and that the existing voluntary arrangement

was not working as well as expected. Fortunately in Southwark our practices are broadly in accordance with the objectives of the Code.

The RES Act provides a framework of administrative sanctions that will allow regulators to tackle non-compliance in ways that are; transparent, flexible and proportionate to the offence.

The Act also places a duty on regulators to:

- review the burdens they impose
- reduce any that are unnecessary and unjustifiable
- report on their progress annually.

The overall aim of this is to help regulators meet the requirements of the Government's better regulation agenda. Further guidance is available on the BIS website.

Primary Authority Scheme

From 6 April 2009, any business operating across council boundaries – regardless of its size – has the *statutory* right to form a partnership with a single local authority in relation to regulatory compliance. This builds on the foundation created by voluntary home and lead authority initiatives, but entails a fundamental shift in the nature of the relationship between the regulated and the regulators towards cooperation – with the aim of bringing benefits to both parties.

The operation of the scheme is a statutory responsibility of the Local Better Regulation Office (LBRO) whose role will be to register partnerships, issue guidance and resolve disputes. The principles of the scheme are set out in Part 2 of the Regulatory Enforcement and Sanctions Act 2008.

We currently act as Home Authority for a nationally operating company, 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:

- South London and Maudsley NHS Foundation Trust
- Hygrade Foods
- Simply Sausages
- Leathams Larder
- Neal's Yard Dairies

We wait to see if any business will seek Southwark as its Primary Authority. If they do it could place further demand on our staff resources

3.0 Service delivery

3.1 The food safety inspection programme

The risk assessment programme for food safety and standards is set out in considerable detail in the food safety code of practice derived from European legislation, and issued under section 40 of the Food Safety Act 1990. The risk assessment criteria, set out in annexe 5 of the code of practice, provide that all food premises should be subject to official controls at intervals determined by the risk they present. Additionally, the code now provides for other forms of interventions for premises where the risk category is C or D and also allows food authorities the option of using alternative enforcement methods for food businesses with the lowest risk – Category E.

3.2 Risk programme

Premises are categorised for food hygiene from A (high) to E (low) according to an established set of criteria laid down in Annexe 5 of the code of practice. Category A and category B businesses must be subject to interventions/inspections at least every 6 months and 12 months respectively. Category C and D businesses must be subject to interventions at least every 18 months and 2 years respectively. However, the revised code of practice provides that the interventions can alternate between inspections and other forms of official control once the premises are deemed to be broadly compliant with relevant food law. In practice this still means that the premises must be visited at least every 18 months or 2 years respectively by a fully qualified food officer. Category E premises may be subject to an alternative enforcement strategy. Annexe 5 also provides for food standards inspections according to risk. In practice, food standards inspections are not carried out in isolation but completed at the time the premises is subject to a hygiene inspection if the standards inspection is due within a reasonable period of time. This is both to make the best value of resources and to reduce the inspection burdens on businesses.

3.3 The food hygiene inspection programme

The food hygiene inspection programme is given in Appendix A, table (1) of this plan. The total number of premises in Southwark that are liable to food law enforcement visits is 2686. In 2009/10, 266 are assessed as high risk, 1196 medium risk, and 842 lower risk. 382 have not yet been risk assessed. A break down of the profile of the premises is given in 2.5 above.

The team also has responsibility for the inspection and granting of approval under EU Regulations of certain manufacturers and cold stores based in the borough. There are currently 10 premises within the borough that are approved but it is likely that more premises will require approval in 2009/10.

In 2009/10 we have prioritised for inspection the high risk premises and overdue and due non compliant category C premises and the unrated and

new premises. We will also prioritise home authority premises and approved premises. If there is any spare capacity we will review the remaining 788 due and overdue category C premises but it is unlikely (see resources section) that we will be able to inspect the majority of these premises. We have not set a target for the due and overdue lower risk inspections, categories D and E, a total of 532, as our capacity to inspect these is limited. We will send out questionnaires to these businesses to establish if the nature of their business, and possible risk, has changed. The inability to inspect premises when due has implications for the accuracy of information provided for consumers on the scores on the doors website and the ability of a business to demonstrate any improvement through improved star rating on the website. This will mainly affect the lower and medium risk premises which do not receive an inspection with statutory time limits. High risk premises are within the inspection programme and their data on the website will be accurate.

3.4 Development of food safety management systems for businesses

The service works with businesses to help them comply with the law and to encourage best practice.

The Food Hygiene (England) Regulations 2006, which commenced in January 2006, provided for implementation of EU Regulations that introduced a mandatory new requirement for every food business to have a documented procedure based on the principles of hazard analysis and critical control points (HACCP). This is effectively a food safety management system designed to secure food safety throughout the food business operation by adopting, and following, 7 key principles on which HACCP is based.

The FSA expectation is that 75% of businesses will be compliant with this requirement by 2010. A national survey in 2007-08 indicated that on average 48% of businesses were compliant. Southwark is currently below this at 24% compliance (compliance is measured using scores from the previous inspection). NI 184 will provide a bench-mark for all authorities for the number of broadly compliant businesses. This information is currently unavailable but will be collected in due course by the FSA. There are no comparison figures for fully compliant businesses unless a specific exercise is requested.

Information and advice about food safety management systems is given to businesses as a part of the programme of risk based inspections and during any joint targeted operations and initiatives such as food safety week. Limited staffing resources dictate that the programme will continue to be introduced in an ad hoc fashion. We are currently considering other ways of spreading the concept, for example by a targeted mail out of information to businesses which are considered most likely to achieve compliance. Their compliance can then be measured during the programmed inspection when it takes place. We will continue to explore funding options as they become available.

3.5 The food standards inspection programme

The food standards inspection programme is given in appendix C table (2) of this plan. The total number of premises in Southwark that are liable to food law enforcement visits is 2686. In 2009/10, 12 are assessed as high risk; 780 medium risk; 1518 lower risk and 382 are not yet rated.

Food standards inspections will normally be carried out when the food hygiene inspection is carried out. Currently the majority of category C premises are not being inspected. These are predominantly retail premises of packaged and non-packaged food products, often of ethnic origin, which are lower risk for food hygiene. There is a risk that unlabelled, illegally imported food or food that does not meet UK standards on sale in these lower risk shops will remain undetected. However some additional sampling at these premises is being carried as part of a FSA funded sampling programme. Discussions are underway as to what enforcement action can be put in place to improve compliance. In addition all Food Safety officers and six officers from Trading Standards are receiving refresher training in food standards and labelling with a view to developing joint projects in food standards.(see para 3.9).

3.6 Food safety service requests

The service receives around 1,000 service requests per year. They are investigated in accordance with established policies, procedures and guidance notes. An initial response is expected within 3 days, however the team aims to provide an emergency response in 24 hours. For infectious disease notifications a response is expected for 95% of enquiries within one day and 100% within two days. Complaints will be prioritised to allow for additional resources to be made available for the inspection programme. It is estimated that around 25% of service requests will not be investigated and the requestor will be advised that the service is unable to respond to the request. Standard letters will provide basic advice or signposting and additional information is being developed for new businesses to assist officers to discharge their functions.

3.7 Food premises sampling programme

Sampling is undertaken as part of joint programmes with other local authorities. See appendix C for the sampling programme agreed for 2009-10. Additional funding of £8600 was awarded by the FSA specifically for imported food sampling in 2008-09, a summary of the results can be found at para. 6.3. This year a further £10,600 has been awarded to continue this project. The targets are also in appendix C.

3.8 Control and investigation of outbreaks and food related infectious disease

All local authorities and PCTs are required to have plans for dealing with major outbreaks including outbreaks of food and waterborne disease. These requirements are from the department of health emergency preparedness division NHS emergency planning guidelines 2005. 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. (Its also part of the PCT and South East London health authority major incident plans). The key points of the plan are that the Consultants in Communicable Disease Control

(CCDC) or their deputies have the power to designate an outbreak as major, and call a meeting of the outbreak control team and ensure that the local authority takes any necessary legal action to control the outbreak.

The service also has statutory responsibility for officially receiving and recording formal notifications of infectious disease occurrences in the borough. Diseases subjected to this process are detailed in the Public Health (Control of Diseases) Act 1984, currently under review and the Public Health (Control of Infectious Diseases) Regulations 1988. This role is primarily discharged by the reactive food team, working in close partnership with the Health Protection Unit (HPU) and sector partners. On average, the team deals with around 500 notifications each year (see section 6). However, although the trend indicates an annual gradual reduction, the service anticipates an increase in infectious disease occurrences and notifications for the period 09/10 owing to known increase in cases of measles across the South East London sector. Elevated occurrences of measles continue to be experienced in the sector.

3.9 Food safety incidents

The service receives food alerts from the food standards agency via email directed to a dedicated mailbox. Alerts are either for action or information and the authority complies with the Food Safety Act 1990, section 40 Code of Practice in this regard. Last year the service received and processed 71 food alerts of which 10 were for action. More recently, the service also receives allergy alerts from the agency and these are processed in accordance with advice provided in the agency's letter referenced ENF/E/07/013. 80 allergy alerts were received and processed last year.

Telephone and mailing lists for affected/ implicated food businesses are derived from the management information system (APP).

3.10 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
- Communicable Disease Action Group (Local Authorities + Director of Public Health & others)
- Environmental Health Working Group (Local Authorities + CCDC)
Food Hygiene & Food Standards
- South East London Food Liaison Group (Local Authorities + HPA+ Public Analysts)

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

3.11 Food safety advice to businesses and the public

The food safety team promotes awareness within the food trade and the local population through the following means:

- Advice given during inspections and other visits to the premises
- Responding to service requests and enquiries
- Local and national media including council magazines
- Advisory information and links on the environmental health and trading standards Southwark council website.
- Provision of advisory leaflets in English and other local community languages
- Participation in the annual national food safety week. This year the event takes place during 15 – 19 June and for the second year running, the event is coordinated and led by the Food Standards Agency (FSA). The event often follows a theme and the main focus this year is on people over the age of 60 and the need for correct storage and handling of food in the home. The reason this theme was chosen is because there has been noticeably sharp rise in the number of people, specifically within this age group, who have suffered illness caused by Listeria. The number of Listeria cases in people over 60 has doubled since 2001 and Listeria has caused more deaths each year than Salmonella and E.coli 0157 combined. The food team intend to give presentations and talks to individuals at day centres/ drop in centres for people over 60 and, where possible, residential care homes. Consideration is being given to the likely benefits of including the Primary Care Trust (PCT) to address the target group on matters relating to diet, nutrition and healthy living during the week.
- The team will continue to signpost businesses to safer food better business initiatives and encourage them to adopt the tool kit as a way of producing and developing a food safety management system.
- Provision of regular food hygiene courses in English and other local community languages through Southwark College (this is provided independently not through the council)
- Working with the health and social care team to promote healthy eating in schools and other settings in support of the healthy weight strategy.

4. Resources

4.1 Financial allocation

The budget on SAP for the food and trading standards service is £1,369,502.00. Salaries for food safety staff in post are estimated at £512,413.00. There are 3 vacant posts (2 x Hay 9, 1 x Hay 7) which would require salary costs of around £122,300.00 but there is insufficient resources in the budget to cover these costs. Running costs on SAP are £134,000 for both food safety and trading standards. In past years around 50% of this vacant salaries budget was used to employ qualified external consultants to carry out a significant proportion of the category C and below premises. All analytical services are provided by Eurofins Ltd. and HPA. The legal budget is contained within the Business Managers budget. Legal services are provided through a service level agreement with the in house legal service

4.2 Staffing Allocation

Staffing allocation for all food law enforcement is given below.

Designation	Number in post	Number of Vacancies	Competencies Necessary
Team Leaders	2	0	
Principal Environmental Health Officers	3.5		High Risk Food premises Inspection Food Standards Inspections Closure of Food Premises
Principal Enforcement Officers	1	0	High Risk Food Premises Inspection Food Standards Inspections
Enforcement Officers	2	2	High, medium and low risk food premises inspection depending on experience Food Standards Inspections
Enforcement and Infectious Disease Officer	1	0	Public Health/ Infection control and some general enforcement work
Unit Support Officers	0	1	Admin support
	9.5	3	

4.3 Learning and Development

The council has achieved the Investors in People (IiP) award. Staff development is in accordance with the principles of IiP. The training budget is held centrally.

Training needs of each staff member is documented through the performance management process and recorded on each individual's work plan and on a learning and development excel spreadsheet held in s drive/learning and development.

Staff who are 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 suggest 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.

The Chartered Institute of Environmental Health (CIEH), which is the professional body for environmental health officers, requires its members to undertake twenty hours of training each year as part of the Continuing Professional Development (CPD) scheme. At least ten hours of this training must be on core work areas and officers failing to meet this requirement will lose membership of the professional body. While membership of the CIEH is not essential to delivering food safety enforcement work, the loss of membership caused by a failure to attain the required CPD training could undermine the officers' ability to undertake the range of related enforcement work, particularly if a legal matter is challenged.

5.0 Quality assessment

- The council currently holds Investors in People
- Monitoring and support provided by experienced enforcement officers
- Monitoring of notices and letters
- Shadow inspections
- Post inspection audits of records and enforcement decisions
- Regular team meetings
- Regular one-to-one work reviews

6 Review

6.1 Review against the Service Plan

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

Food Safety	2003/04	2004/05	2005/06	2006/07	2007/08	2008/09
Number of service requests	1,716	1,397	1,120	1083	993	840
Number of hygiene inspections carried out	1,699	1,684	1,270	1526	1360*	1235
Number of written warnings	777	1,089	888	1081	1090	917
Number of improvement notices served	239	215	266	248	198	152
Number of emergency prohibition notices served	2	11	6	4	3	6
Number of prohibition orders served	0	0	0	0	1	1
Number of summonses served and formal cautions	76	101	218	182	123	169

* amended figure (previously reported inspection figure was inaccurate)

Food hygiene inspection programme 2008-09

Risk category	Planned target	Revised * target	Total achieved	Percentage achieved
A	18	21	21	100
B	204	184	184	100
C	380	380	328	86
D	0	21	21	100
E	0	32	32	100
F	5	0	0	0
Total	607	638	586	92
Unrated	364	690	315	46

*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.

Food standards inspection programme 2008-2009

	Planned target	Revised * target	Total achieved	Percentage achieved
A (high)	5	6	6	100
B (medium)	344	344	167	49
C (low)	244	244	99	41
Unrated	364	690	356	52
Total	957	1284	628	49

*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.

Food service requests 2004 – 2009

Category of Service Request	04/05 Actual	05/06 Actual	06/07 Actual	07/08 Actual	08/09 Actual
Food Hygiene/Safety	650	557	531	439	603
Food Standards	211	151	150	131	70
Infectious Disease Investigations	364	282	256	252	623
Licensing Applications / Registrations	65	32	80	85	77
Miscellaneous*				86	111
Total	1,297	1,022	1017	993	1,484

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

6.2 Identification of any variation from the service plan

There was no significant variation from the service plan

6.3 Key achievements in 2008 – 2009

The key achievements in 2008 – 2009 were:

- All high risk premises, categories A and B, were prioritised and inspected. Of the 21 category A inspections 19 resulted in a lower risk category demonstrating improvements in hygiene and food handling practices. However, this was offset by an increase to category A of 6 category B premises inspected. 62 category B inspections resulted in a lower risk category.
- The target response time to food service requests was maintained at 80% in 24 hours and 100% in three days. The team's performance surpassed the target for 24 hours response, achieving overall 91.175% for the year. This is an improvement on our achievement last year and represents a year on year improvement.
- 152 formal improvement notices were served on 82 premises to secure compliance with provisions of food regulations.
- 19 cases relating to food hygiene offences were processed and 169 summonses and formal cautions were issued; 6 of these premises were food businesses where conditions were so unhygienic that emergency prohibition notices were served resulting in the immediate closure of the premises at the time of the inspection. The Magistrates' Court subsequently confirmed the notices and emergency prohibition orders were issued. 2 premises closed down voluntarily at the time of inspection. An application for the prohibition of a food business operator was granted by the court and this person is now prohibited from being involved in the management of any food business.
- 623 cases of infectious diseases notifications including food poisoning were received and processed by the team. Investigative/follow up activities were undertaken in 144 of the reported cases to identify the sources of the infections and to give advice to prevent their spread. All activities were undertaken working closely with the Health Protection Agency and related partners.
- During the sampling survey of imported foods a total of 147 samples were obtained originating from in excess of 26 non-EC countries. It was not possible to obtain information concerning the origin of some of the products. The labelling of these foods was also examined and 70% (102) contravened labelling requirements, some minor contraventions, some more serious contraventions and some with absolutely no labelling whatsoever.

Samples were taken of particular food groups to be analysed for mycotoxins, arsenic, lead and cadmium or salt content. 19 samples were analysed for arsenic and 22 samples for lead and cadmium. The composition of all these products was satisfactory. 18 samples were analysed for salt content with three returning unacceptably high results. 88 samples were analysed for mycotoxins and nearly a third of these (26) contained unacceptably high levels, and some extremely high levels, of total aflatoxin and aflatoxin B1. Aflatoxins are produced by mould species that grow in warm, humid conditions. Aflatoxin B1 is the most toxic. It is a potent carcinogen in laboratory animals and there is evidence that it is a genotoxic human carcinogen i.e it can cause cancer by reacting with genetic material. Although there are no legal limits set for some of the foods sampled the public analyst believes that it is reasonable to compare the results with the maximum levels applicable to nuts and cereals as set by Commission Regulation. The maximum limits are 2 µg/kg aflatoxin B1 and 4 µg/kg total aflatoxin. The highest level detected was 290 ± 70 µg/kg aflatoxin B1 and 332 ± 79 µg/kg total aflatoxin. This equates to levels approximately 145 times and 83 times higher respectively than is considered safe for products such as nuts. This particular product was whole egusi (melon seeds). The vast majority of these foods are consumed by the West African population and the results of this relatively small sampling initiative suggests that this section of our community is being exposed to unacceptably high levels of carcinogenic substances in their food. This was an informal survey so it is not possible to take legal action for the sale of unsatisfactory foods. Another problem also identified was the lack of traceability mechanisms which makes identification of the origin/importer very difficult. Further FSA funded sampling of imported foods will take place this year. This work helps provide evidence that the Food Standards Agency can use to support their discussions at EU level concerning the need for legal limits for contaminants in these types of food.

The team took part in a national LACORS/FSA sampling survey of kebabs. The study examined the nutritional value of a doner kebab in pita bread, without salad or sauces, finding: the average kebab contains 98 per cent of daily salt, nearly 1000 calories – half a women's daily food intake and 148 per cent of daily saturated fat. The survey also showed that a doner kebab could be far worse for you than the average statistics suggest, with the worst kebabs containing: 1990 calories before salad and sauces – over 95 per cent of a women's daily calorie intake, 346 per cent of a women's saturated fat intake and 277 per cent of an adult's daily salt intake. If the doner kebab was classified using the traffic light system, which is used in supermarkets to classify pre-packaged food: 97 per cent would be red for fat, 98 per cent would be red for saturated fat and 96 per cent would be red for salt. Although there are no legal limits for the calorific value, fat or salt content of kebabs the owners of the kebab shops in Southwark from which food was sampled were advised of the results and recommended to reduce the levels in their foods.

- The service continues to participate in the web publication of food hygiene inspection scores and corresponding star ratings of premises in Southwark (Scores on the Doors). The information is accessible via a third party website, the operators of which the food team had worked with to develop the star rating system which has formed the template for most other local authorities operating the scheme. Last year the site recorded 18,788 visitor requests for hygiene/star rating information of premises in the borough. Compared with the previous year, requests to the site have fallen by approximately 33%, however, this decline could be the result of no publicity of the site during the year, in contrast to previous initiatives led mainly by the company hosting the data. Publication of hygiene scores and corresponding star ratings continues to positively influence food business operators' compliance with food law and provide useful information to the public. The site http://www.scoresonthedoors.org.uk/client-detail.php?client_id=10 became live on January 1st 2006 and is shared with a number of other local authorities across the country. The service was among the first in the country to publish such information.
- Food Safety week was led by the Food Standards Agency for the first time and focused hand washing using the character "Grubeye". The team celebrated the event by working closely with schools in the borough. Information and resource packs were provided to schools from which expressions of interests were received and presentations were given to a select group of children in 3 schools. A display and information stand was provided at the Town Hall for the whole duration of the week. Presentations were given at the following schools:

 - Sacred Heart Roman Catholic School, Camberwell New Road, SE5
 - St. Georges Cathedral Roman Catholic Primary School
Westminster Bridge Road, SE1

Press articles on food safety week activities were published in Southwark News and Southwark life. The publications also included valuable food safety advice. All the events were well attended.
- Links with PCT and Health and Social Care. Discussions with Healthy Schools around healthy eating, representation at launch of healthy weight strategy, representation on Healthy Southwark delivery group.

Appendix A Inspection and sampling programmes 2009/10

(1) The food hygiene inspection programme

Risk category	Number of premises	Frequency of inspection due	Primary Inspections due 2009/2010	Target
A (High)	15	6 months	30	30
B (High)	238	1 year	238	238
C (Medium)	1201	18 months	208	84*
C (overdue)			691	27*
D (Low)	362	2 years	129	0
D (overdue)			136	0
E (Low)	488	3 years	118	0
E (overdue)			149	0
EU approved premises	(10)	As per risk category - included above		
No category	382		382	382
Estimated new businesses			250	250
Total	2686		2331	1011

* Non broadly compliant premises

** Target adjusted to reflect estimated businesses ceasing trading

(2) The food standards inspection programme

Risk category	Number of Premises	Frequency of inspection due	Number of Inspections due 2009/2010
A	12	1 year	12
B	780	2 years	204
C	1512	5 years (124)	
No category	382		382

Total	2686		722
Estimated new businesses			250

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

(3) The microbiological sampling programme

Issue	Sampling period	Number of Samples (Performance Indicator)
Food Sampling Programme in accordance with SE sector programme and LACORS co-ordinated programme	April 2009– March 2010	50
Food Manufacturer Sampling	April 2009 - March 2010	25
Total for HPA		75

(4) Compositional (public analyst) sampling programme

Issue	Sampling period	Number of Samples (Performance Indicator)
Food Complaints	April 2009– March 2010	20 (Not included as a PI)
Food Sampling Programme in accordance with SE sector programme and LACORS co-ordinated programme	April 2009– March 2010	70
Home Authority Sampling .	April 2009– March 2010	20
Total for Eurofins Laboratories		110

(5) South east sector/HPA/LACORS sampling programmes

- 1 LACORS/HPA
RTE sliced meats and environmental swabs

- 2 LACORS/HPA
Catering at large events
- 3 LACORS/FSA
Pre-packed sandwiches
- 4: LACORS Co-ordinated programme
Nutrition - nursery and primary school meals
- 5: LACORS Co-ordinated programme
Salts, fats, sugars - continuation
- 6 LACORS Co-ordinated programme
Minced beef
- 7 HPA pan-London
Sprouted seeds and vegetables
- 8 HPA pan-London
Sesame seeds and products
- 9 HPA pan-London
Water quality – mobile caterers
- 10 SE Sector
Residential care homes – listeria
- 11 SE Sector
Colours – Chinese/Indian catering
- 12 Southwark/FSA
There is a wide variety of foods directly imported from third countries (countries outside the EC) into Southwark. The FSA has again awarded Southwark a grant specifically to sample a selection of these foods. A report will be submitted to the FSA following the sampling project.

Participation in these sampling programmes will be prioritised depending on resources and any emerging issues that may take precedence.