



**ROCHDALE**  
METROPOLITAN BOROUGH  
**COUNCIL**

# **FOOD SERVICE PLAN**

## **2009-2010**

**PLANNING & REGULATION SERVICES**

**June 2009**

# **FOOD SERVICE PLAN**

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# **FOOD SERVICE PLAN**

## **1. Service Aims and Objectives**

### **1.1 Aims and Objectives**

To ensure the safety of food produced, sold and consumed within the Borough.

To ensure that food meets appropriate quality standards, is correctly labelled and described and is free from contaminants.

To identify risks to the safety of food produced or sold within the Borough, advise and educate food businesses and take enforcement action where appropriate.

To advise and educate members of the public regarding food safety and standards matters.

All the aims and objectives above are also applicable to Animal Feed.

### **1.2 Links to Corporate Objectives and Plans**

The Food Service supports the proactive approach of the Council's aims, priorities and continuous improvement programme as defined in the mission statement defining Rochdale Council's purpose. The work of the Food Service as a whole strongly contributes towards the council's aim "to create the best quality of life for all local people by providing quality services that matter to them" (Stepping Up, 2007). Their activities are aimed at reducing ill health, in the form of food poisoning, and enabling consumers to have confidence in the quality of the food they buy.

## **2. Background**

### **2.1 Profile of the Local Authority**

Rochdale Metropolitan Borough is located in the southern Pennine Moors, in the north-east region of the Greater Manchester conurbation. The Borough covers 62 square miles of which about two-thirds is rural. It is characterised by urban developments of dense housing and industrial areas located along major roadways, surrounded by hilly areas of rural land.

The Borough is divided into four Townships based around the towns of Rochdale, Heywood and Middleton, together with the eastern urban area that form the Pennines Township. Each Township has its own distinctive background and character with which residents identify.

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### ***2.1.1 People***

The population of the Borough at the 2001 Census was 205,357, which was a slight increase from the 1991 Census. The population is divided between the four Townships as follows: Heywood 29,240; Middleton 45,688; Pennines 32,996 and Rochdale 97,433.

The ethnic profile of the Borough is a diverse mix with 14% of people being from the black and minority ethnic (BME) group. The majority of these people are Pakistani with most living in the Rochdale Township where the BME community represents approximately 20% of the population.

The population of the Borough is ageing slightly less rapidly than the rest of the country.

### ***2.1.2 Housing***

The Borough's housing tends to be of low value with 58% of properties belonging to Council Tax Band A, with bands B and C accounting for a further 27%. The layout of the Borough generally comprises of high density housing in urban areas surrounded by expanses of rural land.

### ***2.1.3 Education***

In 2006 overall improvements were made in the academic performance of children at all key stages. Of particular note, the Council achieved its highest level of achievement regarding pupils gaining 5 or more GCSE's at grade A-C, with 50.1% of pupils achieving this attainment level. However, the educational attainment of adults in the Borough continues to fall below the national average. Approximately 21% of adults in Rochdale Borough have qualifications at NVQ Levels 3 (equivalent to 2 A levels), 4 and 5 (graduate level) compared to 28% in England & Wales.

### ***2.1.4 Health***

The Council works alongside its partners in the Health Partnership to improve the health of the Borough's population. The Council's main partners include the Heywood, Middleton & Rochdale Primary Care Trust (HMRPCT).

Life expectancy for men and women in the Borough is less than the national average and in some of wards is ten years less than in other parts of the Borough. Poor life expectancy is affected by the incidence of coronary heart disease, respiratory disease, stroke, cancers, injury, poisoning and infant mortality.

Office of National Statistics figures also show that the general health of the Borough's inhabitants also needs to be improved. When surveyed 66.1% of the Borough's population considered they were in good general health compared to the national average of 68.6%. Also, 20.61% of the population had a 'limiting long-term' illness compared to 18.23% in England & Wales.

The infant mortality rate is above the national average and levels of teenage conceptions are high. Children also have more tooth decay, missing or filled teeth than the national average, and obesity levels are high for children aged 4 years of age.

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### ***2.1.5 Employment***

Rochdale has a moderately weak economy that is overly dependent on distributive, hotel & catering, public administration & health and manufacturing industries. The number of start up businesses is relatively low, but medium sized businesses and new businesses are being attracted in increasing numbers.

62% of the people in the Borough are of working age. Of these approximately 73% are in employment, with 5% unemployed. The remainder of those of working age are economically inactive, e.g. retired or looking after a home.

Unemployment rates in the Borough are slightly higher than the national average, with some wards having significantly higher unemployment, e.g. in Milkstone / Deepdish and Central Rochdale / Falinge 6 to 7% of the working age population are unemployed.

The major employment sectors in the Borough are distribution, the hotel & catering industry (25% of jobs) and public administration, education and public health (25% of jobs). Notably, these employment sectors together with manufacturing account for a greater percentage of jobs on a sector by sector basis compared with the rest of England & Wales. Similarly, jobs in banking, finance and insurance are low at approximately 12% of jobs compared to the national average of 18%.

A major threat to employment concerns the manufacturing sector, which is forecast to lose around 5,000 jobs in Rochdale Borough by 2015.

Of further significance, jobs in the Borough pay about £35 less per week compared to the average for England & Wales.

### ***2.1.6 Crime***

Crime, and the fear of crime and disorder, remains a major concern for the community. Even though the total number of crimes has fallen by 18% over the last three years (based on the British Crime Survey), and burglary and robbery have fallen by more than a half and a third, respectively, the crime rate is still high compared to the national average.

Many people also still feel unsafe in their own homes or neighbourhood.

Anti-social behaviour particularly by the young continues to be a problem.

### ***2.1.7 Environment***

Rochdale Borough is one of the greenest boroughs in Greater Manchester. However, only 22% of households have close access to good quality green spaces. Furthermore, in a recent survey only 53% of residents were satisfied with the local environment.

Although the Audit Commission praised the Council in February 2006 for improvements in household waste recycling rates, they also noted that we still need to make improvements in this area.

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The Borough's ecological footprint is 2.8, which means that if everyone in the world lived as we do in the Borough, we would need 2.8 planet Earth's worth of resources to continue a sustainable existence.

### ***2.1.8 Deprivation***

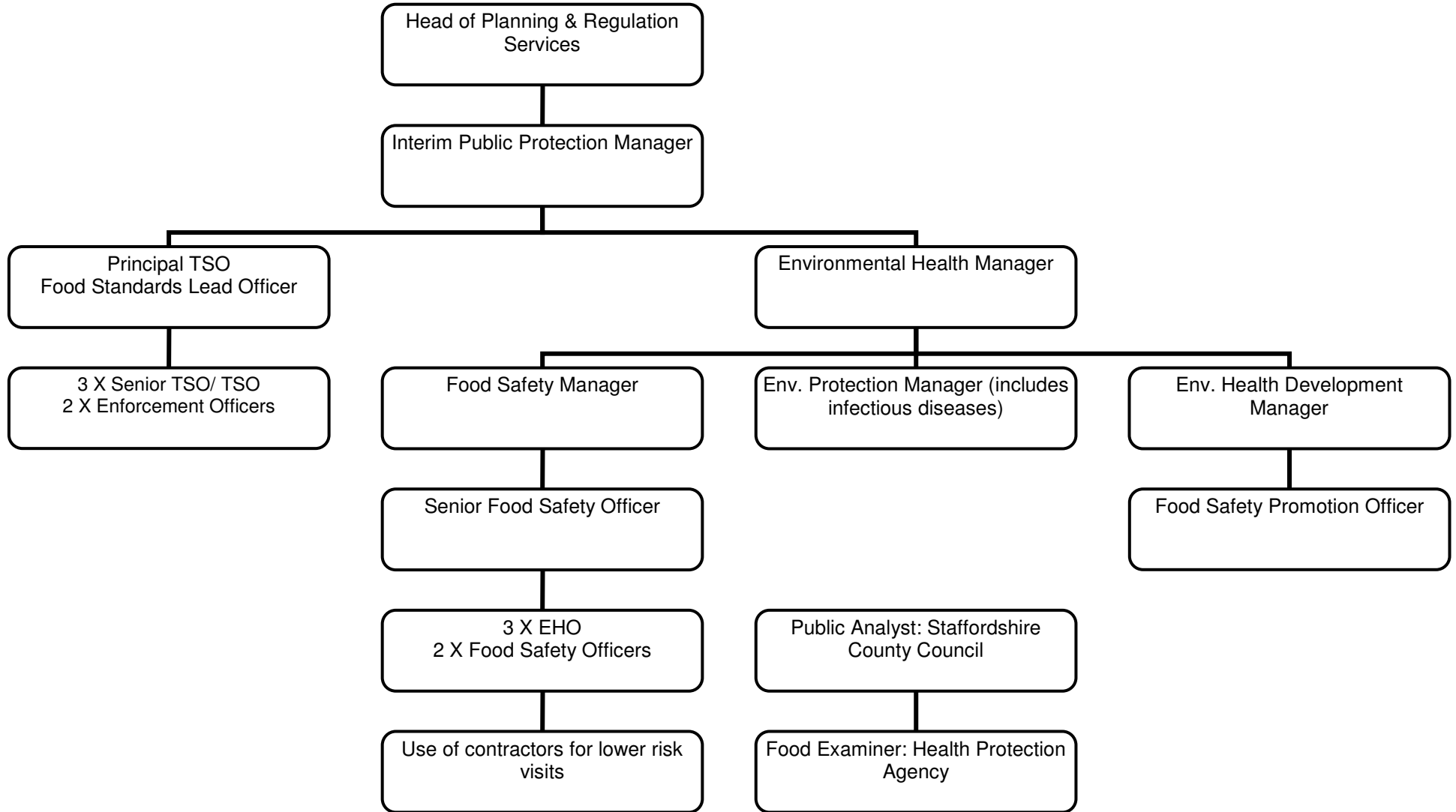
The Government's Deprivation Indices rank Rochdale Borough as the 25<sup>th</sup> most deprived Borough in the country. This rating is based on factors that include employment, income, housing and health.

The Borough's textile-based industrial past has not been replaced by a major source of employment. This has left the Borough with a relatively unskilled, poorly educated, low-earning workforce; living in some areas in low-value housing in densely populated urban areas. Associated with these factors are relatively high unemployment and poor health.

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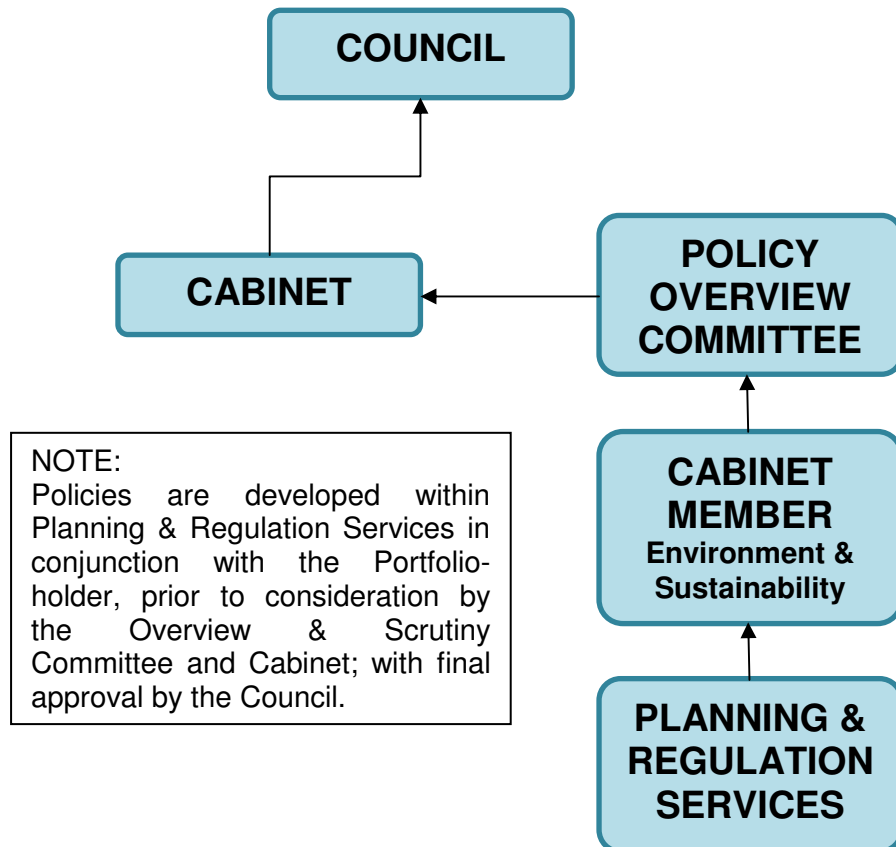
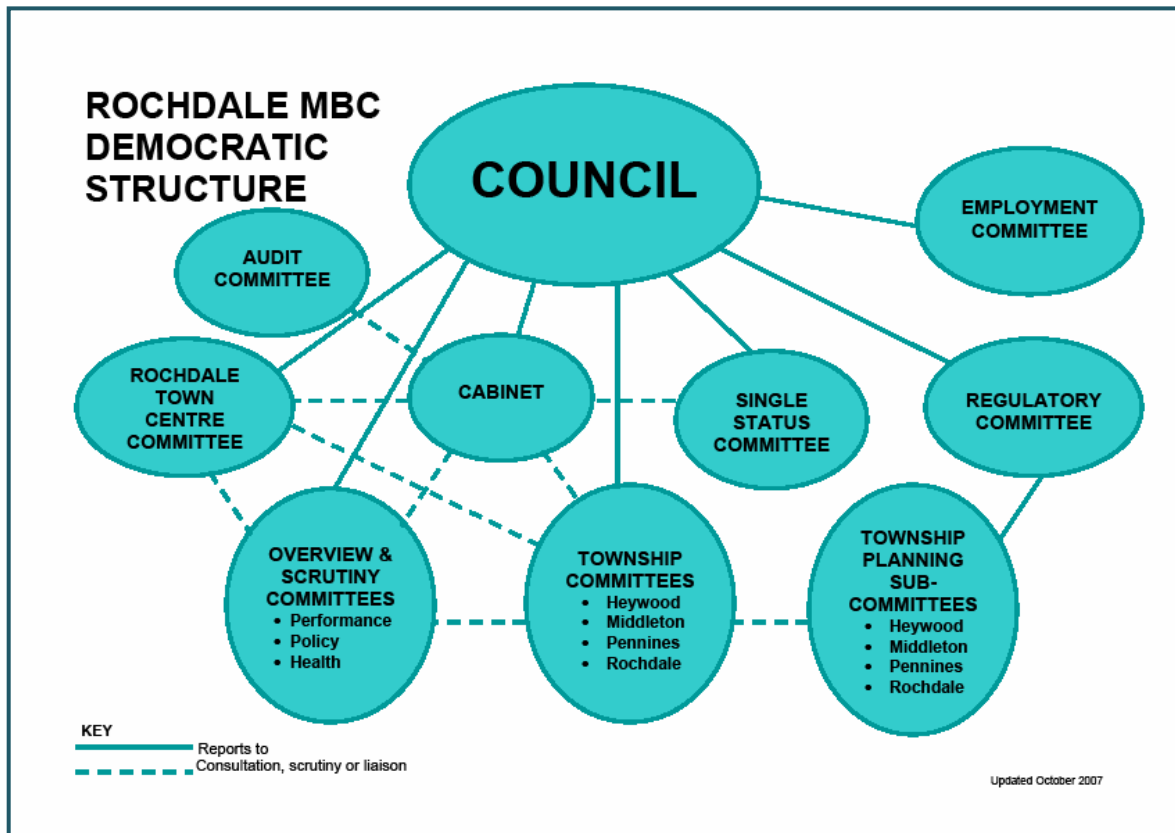
## 2.2 Organisational Structure

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# FOOD SERVICE PLAN

## COUNCIL COMMITTEE STRUCTURE



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## **2.3 Scope of the Food Service**

The food service is provided by three sections of the Environmental Health and Licensing Service and the Trading Standards Service, each of which is also responsible for a number of other services. The following is a list of the main responsibilities, with an indication of the other services provided:

### **2.3.1 *Environmental Health & Licensing Service (Food Safety)***

- a) Providing a comprehensive, high quality, food safety service in accordance with the FSA Framework Agreement.
- b) Programmed food safety and health and safety inspections of food premises, with reference to the FSA Code of Practice and Practice Guidance (revised March 2006).
- c) Investigation of complaints regarding food premises and items of food produced or sold within the Borough.
- d) Participation in consultations for planning approval, building regulations, licensing applications etc.
- e) Dealing with requests for information and advice from food businesses and members of the public.
- f) Routine sampling of milk and of private water supplies from food premises, and participation in national surveys organised by the Food Standards Agency, Local Authorities Co-ordinators of Regulatory Services (LACORS), Health Protection Agency etc.
- g) Contribution to Greater Manchester Food Liaison Group and other regional/national agencies.
- h) Use of contractors to make effective use of budgets by contracting out hygiene visits to lower-risk premises.
- i) Control and investigation of outbreaks and food related infectious disease is provided in conjunction with the Environmental Protection Team.
- j) Food Safety educational and promotion work.
- k) Other services provided by the Environmental Health & Licensing Service include routine visits to farms and smallholdings to check movement records and standards of animal welfare, general environmental health services, including health and safety, pollution control and pest control.

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### **2.3.2 Trading Standards (Food Standards & Animal Feed)**

The Trading Standards Service is responsible for all matters relating to Food Standards and Animal Feed and endeavours to provide a comprehensive, high quality, service in accordance with the FSA Framework Agreement and Code of Practice.

The service takes an intelligence led, proactive approach to enforcement work in accordance with the recommendations of the Hampton Review (as reflected in the Regulators' Compliance Code - Appendix 1) and food and feeding stuffs work is carried out under this remit.

Where possible, food standards work is incorporated into multi-functional visits where other areas of trading standards responsibility such as Metrology, Fair Trading and Product Safety and Underage Sales are checked and assessed for compliance.

The Trading Standards Service carries out inspections based on risk assessment, trader compliance history, confidence in management systems and originating source. The Trading Standards Service also investigates complaints regarding food standards matters and advises and assists companies for whom it acts as Primary Authority and other food businesses based in Rochdale borough.

The Service also takes food samples to check for compliance with composition and labelling legislation. This is done as part of a planned programme of work in conjunction with neighbouring authorities and on routine visits.

The Service also contributes to the Healthy Eating agenda regionally through the AGMA Food Standards Group and TSNW Food Panel.

## **2.4 Demands on the Food Service**

### **2.4.1 Food Safety**

The breakdown of premises liable for enforcement for Food Safety purposes is as follows

Total Number of Premises	1778
Of which	
Cat A (Highest Risk)	13
Cat B	278
Cat C	792
Cat D (Low risk)	249
Cat E (Very Low risk)	425
Unrated (New businesses)	21

Restaurants and other catering premises make up 70% of the total, with 24% falling into the retail category.

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The following table shows the distribution of these premises in terms of type of activity as set out in the FSA Code of Practice:

Primary Producer	10	Hotel / Guest House	22
Manufacturer / Packer	32	Pub / Club	286
Importer / Exporter	1	Take Away	273
Distributor / Transporter	54	Caring Premises (Elderly peoples homes etc.)	176
Supermarket / Hypermarket	27	School / College	133
Small Retailer	403	Mobile Food Unit	81
Restaurant / Cafe / Canteen	197	Restaurants & Caterers	83

The Authority is responsible for approving premises carrying out specialist processes, which fall within the scope of EC Regulation 853/2004. This includes local food manufacturers, on-farm dairies etc. The numbers of these premises are as follows:

Dairy Products	6
Meat Products	4
Minced Meat & Meat Preparations	1
Cold Stores	3

### **2.4.2 Food Standards**

The breakdown of premises which have been risk assessed for Food Standards purposes is as follows:

Total Number of Premises	1778
Of which:	
High Risk	31
Medium Risk	564
Low Risk*	1183
(*Includes Unrated)	

### **2.4.3 Animal Feed**

The breakdown of for Animal Feed purposes is currently being reassessed following the introduction of new feed hygiene regulations. An initial, pre-risk assessment of the types of premises that are likely to be covered by the legislation is as follows:

Total Number of Premises	300
Of which:	

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High Risk	0
Medium Risk	20
Low Risk*	280
(*Includes Unrated)	

### **2.4.4 Service Delivery Points**

All Food Hygiene and Food Standards services provided are based in Telegraph House, Baillie Street, Rochdale and can be accessed in person by calling at the Planning & Regulation Service Reception on Floor 1 between the hours of 8.30am and 4.45pm, Monday to Friday. The Council also has a number of other Customer Service Points throughout the Borough where customers can register complaints, to be forwarded to the Department, and these are open during the same periods:

Floor 2, Municipal Offices, Smith Street, Rochdale OL16 1LQ	Heywood Customer Service Centre, 44/46 Market Street, Heywood OL10 4LY
Middleton Council Offices, Sadler Street, Middleton, M24 5UJ	Littleborough Council Offices, Harehill Park, Littleborough OL15 9HF
Kirkholt Customer Service Centre 46 The Strand, Kirkholt, Rochdale OL12 2JG	Milnrow & Newhey Customer Service Centre, Milnrow Library, Newhey Road , Milnrow OL16 3PS
Langley Customer Service Centre 17 Lingmell Close, Langley, Middleton, M24 4HS	

The service can also be contacted by telephone via the Council's "Contact Centre" and by email. This includes an "Out of hours" emergency service.

The Food Standards and Animal Feed service can also be contacted via Consumer Direct.

### **2.4.5 External Factors**

Approximately 14% of Rochdale's population are of Pakistani/Bangladeshi and Chinese origin. This part of the population has traditionally included a significant proportion of food business proprietors, many of whom do not have English as a first language.

## **2.5 Enforcement Policy**

The Council has approved an Enforcement Policy, which applies to the whole of the Environmental Health & Licensing Service. This is supported by a Food Safety

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Enforcement Policy. Similarly, the Trading Standards Service has Enforcement and Prosecution Policies, which have received appropriate member approval

Both services carry out their functions in accordance with the Regulators' Compliance Code; a Statutory Code of Practice for Regulators (Appendix 1).

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## 3. Service Delivery

### 3.1 Food and Animal Feed Premise Visits

#### 3.1.1. *Food Safety Visits*

The Council has consistently affirmed the view that food safety inspections should be carried out on the basis of risk-based prioritisation, in line with the FSA Code of Practice as far as resources allow. This has included a commitment to carry out revisits to check on compliance where appropriate.

The FSA Code of Practice sets out the frequencies at which routine food safety visits to food businesses should be made:

Category		Minimum frequency
<b>A</b>	Highest risk	At least every six months
<b>B</b>		At least every 12 months
<b>C</b>		At least every 18 months
<b>D</b>	Low risk	at least every 24 months
<b>E</b>	Very low risk	A programme of alternative enforcement strategies or interventions every three years

Category A & B inspections must receive inspections at the frequencies set out above. Once businesses that are rated as Category C are found to be “Broadly Compliant” with legislation (see below), the visits can alternate between inspections and shorter visits to monitor whether they are maintaining a satisfactory standard.

#### Broadly Compliant Premises

The “New Performance Framework for Local Authorities & Local Authority Partnerships: Single Set of National Indicators” issued in October 2007 by the Department for Communities and Local Government, included a new performance indicator in relation to food safety:

NI 184: Food establishments in the area which are broadly compliant with food hygiene law

This measure uses the definition of “Broadly Compliant” set out in the FSA Code of Practice. This takes into account the level of compliance for hygiene, structure and management for each business. At 1 April 2009 the proportion of food businesses in the Borough which were “Broadly Compliant” was 83%.

#### Inspection programme

The number of programmed food safety inspections due during 2009/2010 is 970. These are made up as follows:

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<b>Type of Premises</b>	<b>No of Inspections due</b>	<b>No of Visits planned</b>
Cat A (Highest risk)	26	26
Cat B	278	278
Cat C	520	372
Band D (Low Risk)	125	0
Unrated	21	21

Following a review of priorities within the Environmental Health & Licensing service, the level of resources available to carry out routine food safety visits to food businesses has been reduced. During the coming year we will be unable to visit all of the premises due for an inspection.

Priority will however be given to the higher risk premises. It is estimated that using current staff and contractors, we will be able to carry out the following visits:

- All Category A & B premises will receive an inspection;
- All unrated premises (new businesses) will receive an inspection;
- 132 Category C premises will receive an inspection (those which are not “Broadly Compliant” and those which supply food to vulnerable groups such as the young or elderly);
- 240 Category C premises which were previously found to be “Broadly Compliant” with food safety legislation will receive a brief “monitoring visit” to check whether standards have been maintained. Where this is not the case a full inspection will be carried out;

The remaining Category C premises along with those in Categories D and E are to be targeted by “other enforcement measures” as detailed in the revised FSA Code of Practice. This will involve providing advice through mail-shots and visiting premises subject to complaints.

In line with our commitment to carry out revisits to check on compliance where necessary, it is expected that the above inspections will generate a further 550 revisits.

It is estimated that 4.5 EHO/FSOs (FTEs) can provide this part of the service, plus contractors carrying out the “monitoring visits”.

### Enforcement

In line with the Environmental Health & Licensing Service Enforcement Policy, enforcement activity is targeted at the highest risk businesses and those which repeatedly fail to comply with food safety legislation. In order to increase the percentage of premises within the Borough that are “Broadly Compliant”, the amount of enforcement action taken in these premises over the last twelve months has been significantly increased. In particular, the number of Hygiene Improvement Notices served in 2008/09 was 112, compared with 45 during the previous year.

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### **3.1.2. Food Standards Inspections**

Following the recommendations of the Hampton Review, national regulators were charged with reducing the burdens on business to ensure that no inspection took place without a reason. As such the FSA introduced its new Code of Practice, which details acceptable 'Official Controls' (EU requirements), the minimum 'intervention' requirements for risk rated food businesses. Interventions are defined as an inspection, partial inspection or audit.

The following table shows the acceptable interventions and intervals for Food Standards premises:

<u>TS Food Premise Risk Rating (LACORS)</u>	<u>Type of Official Control / Intervention</u>	<u>Frequency</u>
High (H)	Inspection, partial inspection or audit	Every 12 Months
Medium (M) – Non Compliant	Inspection, partial inspection or audit	Every 24 Months
Medium (M) – Broadly Compliant	Inspection, partial inspection or audit, OR Sampling, surveillance or monitoring	Alternate every 48 Months
Low (L)	Alternative Enforcement Strategies (Sampling, surveillance, monitoring, complaints, questionnaires, BCP)	Every 60 Months

The "New Performance Framework for Local Authorities & Local Authority Partnerships: Single Set of National Indicators" issued in October 2007 by the Department for Communities and Local Government did not include a performance indicator in relation to Food Standards visits. The Trading Standards service performance indicator (NI183) now relates to the 'Impact of local authority trading standards services on the fair trading environment. In 2008-2009, 120 businesses were identified as having a negative impact on the fair trading environment within the Rochdale borough; none of these were food businesses.

In light of these new national requirements, in 2009-2010 the Trading Standards service intends to:

		Approx
1.	Carry out an intervention at all High Risk rated food premises.	31
2.	Carry out an intervention at Medium Risk rated food premises where there is previous non-compliance, low confidence in management systems, no confidence in management indicated or retail food product is placed on the market.	85

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3.	Carry out Alternative Enforcement Strategies in relation to compliant, good confidence in management medium and low risk rated food premises, based on intelligence.	197
4.	Respond to all Food Standards complaints.	40
5.	Carry out a borough-wide sampling programme.	200
6.	Risk assess unrated / outside LACORS food premises.	296

The 5 operational officers have individual work programmes with time allocated to achieve the above targets. Both high-risk and medium risk visits are allocated to specified officers. In addition, officers are required to carry out revisits by the end of the reporting year, to ensure that traders have achieved compliance. Approximately 20 revisits would be anticipated annually.

### ***3.1.3 Feeding stuffs Inspections***

All premises in the Borough that have a potential feed hygiene risk are currently being reassessed in order that an inspection programme can be implemented by appropriately qualified officers from Lancashire's Trading Standards Service.

## **3.2 Food and Feeding stuffs Complaints and requests for Service**

### ***3.2.1 Food Safety***

Complaints/requests for service in respect of food and the hygiene of food premises are dealt with in line with documented procedures. All complaints received are assessed, however the level of investigation and action is determined after consideration of the information received, and is based on the risk to public health arising from the complaint.

Responses to complaints about food that may be unfit for human consumption, or food containing foreign matter, vary from the provision of advice to the complainant, often after liaison with retailers/producers, to detailed investigations resulting in prosecution in line with the Service's Enforcement Policies.

Approximately 60 complaints are received each year about items of food, 150 complaints made regarding hygiene of food premises and there a further 320 requests for advice or service in respect of food and food premises.

It is estimated that this part of the service requires 1 FTE officer.

### ***3.2.2 Food Standards and Feeding stuffs***

All complaints received in the above area of responsibility are recorded and assessed for further action in line with documented procedures. The possible actions, which are available, are included in the Enforcement Policy referred to in paragraph 2.5 and are

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determined by the Principal Trading Standards Officers in consultation, where appropriate, with an investigating officer.

It is our objective to respond initially to all food standards complaints. Enforcement Officers (who would initially receive complaints) may also give advice on civil law remedies prior to any decision on enforcement action.

The Trading Standards Service and the regional Consumer Direct office receive approximately 40 complaints per annum relating to Food Standards, which will be dealt with by the 5 operational officers.

### **3.3 Primary Authority Principle**

The aim of the Primary Authority Principle is to increase communication between local authorities dealing with businesses, which have multiple premises located in different parts of the country. It is a requirement that regulatory services comply with the Home Authority Principle and the Trading Standards service also complies with LACORS Guidance in respect of Home Authorities.

It is recognised that the benefits of the Principle are as follows:

- greater enforcement consistency;
- increased efficiency and reduced enforcement duplication;
- preventative enforcement through advice on compliance;
- resolution of conflicts between different authorities and between authorities and businesses;
- better understanding and awareness of commercial issues;
- increased understanding of local businesses; and
- enhanced technical and audit expertise.

Whilst the Food Service has no formal contractual Primary Authority agreements with local businesses, it does operate within the Home Authority guidelines. It has established working relationships with a number of companies, which have both national and local impact. The home authority work includes advice on procedures, composition and labelling, food safety, staff training, and addressing issues raised by other enforcement bodies. Staff resources to deal with this work have been included with those for inspections and complaints.

The Trading Standards Service deals with approximately 10 referrals from other enforcement bodies and 25 requests for advice received from the companies themselves.

### **3.4 Advice to Business**

#### ***3.4.1 Food Safety***

The Council considers that providing assistance to business, to help them to comply with the requirements of legislation is an essential part of our service. In particular, we make

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contact with businesses during visits to premises to carry out inspections and investigations, during which we provide advice and guidance on a one-to-one basis.

In total, we make approximately 2500 visits to food premises and in addition we receive on average 2500 telephone calls to the office each year. Examples of the types of work which are ongoing are detailed below:

The Food Safety team is continuing to provide support to businesses to assist them in complying with the requirement for documented procedures, which was introduced in revised Regulations in January 2006. The team is helping businesses to use the “Safer Food Better Business” pack, developed by the Food Standards Agency. This sets out approved hygienic procedures for businesses to follow and contains a “diary” for them to use to keep records.

During 2008/09 the Food Safety Team ran three workshops for businesses with a history of failing to comply with food safety legislation. These were attended by 40 businesses. The aim of these was to provide support and guidance, but also to remind the Food Business Operators of the requirements of the legislation and the enforcement options available to the authority. In addition a separate workshop in Cantonese was organised for Chinese businesses. This was attended by 28 people.

20 businesses were provided with free training and mentoring to assist them in complying with the legal requirement for written procedures by using the FSA “Safer Food Better Business” Manual. The training was coordinated by Greater Manchester “Business Solutions” and funded by the Food Standards Agency.

Six training courses provided during the year were attended by 58 food handlers from local businesses. The aim of these was to provide an “update” for those which had received training previously and also give an introduction to the use of the “Safer Food Better Business” manual. In addition, two courses were organised for local Health Trainers.

Work has been continuing to raise awareness of food allergies, which result in 10 deaths nationally each year. Four training courses were attended by 66 candidates from children’s day nurseries, catering businesses and managers of public houses belonging to a local brewery chain.

All of the members of the Food Safety team received training on “healthier eating” during the year, to help them discuss its importance with food businesses. A leaflet and an insert for the “Safer Food Better Business” manual have been produced to assist businesses. The Food Safety team has also been working with the chain to encourage them to offer an increased range of “healthier options” in their menus.

A “Salt Shaker” project was run to encourage fish and chip shops and other takeaways to use shakers with a reduced number of holes. The aim of this is to reduce the amount of salt added to food eaten by customers. This supports the Food Standards Agency priority of reducing consumption of salt, which is linked to high blood pressure and heart disease. After an initial “pilot” scheme involving 13 businesses, the shakers were provided to a further 60 local premises as part of a Greater Manchester-wide project funded by the Directors of Public Health.

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A mail shot to care-homes and retailers aimed to raise awareness of the food poisoning bacteria *Listeria* and the importance of good hygiene and stock rotation for cooked meats. This information was also made available on the Council's website.

During 2009/2010 the Food Safety team will organise a programme of sampling of cooked meats from butcher's shops in the light of the recent Pennington Report, which followed the outbreak of *E coli* O157 in Wales. The results of the sampling will be used to develop a training package for local butchers.

### **3.4.2 Food Standards**

The Trading Standards Service will proactively inform businesses of changes to legislation particularly and where appropriate, developing additional trader advice leaflets to complement its existing range, which are readily available to traders.

The Trading Standards Service dealt with 25 requests for specific food labelling trader advice in 2008/2009.

The amount of staff resource required to carry out this work is too small to quantify as a FTE and is therefore incorporated in the time allocated to the 5 operational officers in their individual work programmes.

In order for the Trading Standards service to maintain a highly skilled team to advise business, all 5 operational food standards officers received the required 10 hours of CPD training on a variety of courses including, Food Factory Inspections, Imported Food, Food Partners, Nutrition and Food Allergy & Intolerance.

### **3.5. Food and Feeding stuffs Sampling**

Sampling of food and feeding stuffs will be carried out during routine programmed inspections, following complaints, requests from the Food Standards Agency, etc and as part of the co-ordinated AGMA programme.

#### **3.5.1 Food Safety Sampling Programme:**

The Council's Food Safety sampling programme includes the following:

- Samples submitted following a complaint;
- Samples taken as part of an investigation of a suspected food poisoning outbreak;
- Routine sampling, to assess the safety of particular foods etc as detailed below:

#### **Routine Sampling:**

- a. Sampling of products produced locally from premises approved under EC Regulation 853/2004, (Dairies, Meat Products premises etc). Sampling of water from local businesses with private water supplies (well or spring water).

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- b. Regional: Carried out within a structured programme devised by the Greater Manchester Food Liaison Group in conjunction with Preston Microbiology Services Laboratory and Lancashire CEHO Food Liaison Group. Detailed protocols are developed to ensure consistency of sampling and results.
- c. National: As required by the Food Standards Agency, LACORS etc and in conjunction with the Greater Manchester Food Liaison Group and Preston Microbiology Services.

Available resources are targeted towards the samples detailed in (a) above.

The resources required to carry out sampling are as follows

- Staff resources are included in those detailed for inspections
- Purchase cost of samples approximately £200
- Samples submitted to the Health Protection Agency are examined as part of a service level agreement.
- Cost of sampling by the Public Analyst is detailed in 4.1 below;

### ***3.5.2 Food Standards Sampling Programme***

The policy in relation to food samples taken to test for compliance with composition, labelling, contamination and presentation requirements is as follows:

#### **Routine Sampling:**

The AGMA (Association of Greater Manchester Authorities) Trading Standards Food Group will agree a sampling programme on a quarterly basis, which will reflect the needs of each constituent authority.

Where applicable, each authority will concentrate on:

- Home Authority Companies
- 'Locally' produced foodstuffs
- Allocated supermarket own-brands.

The following factors may be taken into account when selecting the type of food to be sampled:

- known problem areas
- current consumer concerns including nutritional information
- novel processes or technology
- advice from public analyst
- healthy eating e.g. fat, salt and sugar content.

The consequence of this joint approach is:

- More meaningful conclusions can be drawn from the results of analysis
- Duplication of samples is greatly reduced

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The group also regularly participates in FSA surveys on imported foods and contributes to the LACORS national sampling programme.

In addition to the formalised sampling programme, field officers are encouraged to take other samples where appropriate. In particular these include samples of ingredients or finished product from manufacturers/packers etc.

The service aims to take a minimum of 200 samples per year, the vast majority of which will be classified as informal. Formal samples will generally be taken where a significant problem has been identified, or where formal action is likely.

Complaint samples will be submitted as necessary.

The resources required to carry out sampling are as follows:

- Purchase cost of samples approximately £500
- Analytical cost of sampling approximately £20,000
- As the majority of samples are taken during routine inspections, the amount of staff resource required to carry out this work is too small to quantify as a FTE and is therefore incorporated in the time allocated to the 5 operational officers in their individual work programmes.

### ***3.5.3 Arrangements for analysis and examination of samples***

Up to 30 June 2009 samples for analysis were submitted to Eurofins Ltd, who acted as the authority's Public Analyst. From 1 July 2009 this changed to Staffordshire County Council Scientific Services.

During 2008/09 samples for microbiological examination were submitted to the Preston Microbiology Services (Formerly PHLS). From 1 April 2009, the laboratory changed its name to the Health Protection Agency: Food, Water and Environmental Microbiology Network (Preston Laboratory)

### **3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease**

The Council liaises with a Consultant in Communicable Disease Control (CCDC) from the Greater Manchester Health Protection Unit in all matters relating to the control and investigation of food related infectious disease. A CCDC heads the Outbreak Control Team, which is convened in accordance with criteria laid down in the Infectious Disease Outbreak and Control Plan, and includes representatives from the Council.

The demand on resources from this area of work is difficult to assess, in view of the wide variety of types of outbreak, particularly in terms of numbers affected and types of premises implicated. If an outbreak affected a large number of people, but the source was obviously restricted to one known establishment, there would be a considerable resource implication for the Environmental Protection Team, which is responsible for the tracing and surveillance of those affected. The Food Safety Team, on the other hand, would have relatively little involvement. However, in different circumstances the opposite

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would be true, and the impact on the other work of the Food Safety Team would be considerable.

Our best estimate of the staff resource required for this part of the service, based on the last year's experience, is 0.3 FTE officers.

### **3.7 Food Safety Alerts**

Food Alerts are issued by the Food Standards Agency to advise local authorities and consumers of foods which may not comply with food safety standards. These are dealt with in line with documented procedures, which comply with the guidance provided in the FSA Code of Practice.

Based on experience of previous years' Food Alerts, we expect to receive approximately 70 Alerts per annum. In the case of the Food Safety team, this equates to around 2 hours of officer time per week to carry out all duties involved in the operation of the system and any follow-up work. In relation to Food Standards and Feeding stuffs this work would equate to approximately 1 hour per week.

### **3.8 Liaison with Other Organisations**

We are committed to being involved in liaison with other local authorities, and associated organisations, to achieve consistency and to maintain our level of knowledge and understanding in a rapidly changing area of work. This is done by being actively involved in a number of Groups, including:

- Association of Greater Manchester Authorities (AGMA)
- Greater Manchester Public Protection Partnership
- Greater Manchester Food Hygiene Liaison Group
- AGMA Food Standards Group
- Greater Manchester Health Protection Unit
- Heywood, Middleton & Rochdale NHS Primary Care Trust
- TS North West Food Standards Group
- TS North West Agriculture Sub Group
- NW Food & Health Task Force
- FSA Regional Co-ordinator (GONW)

We also have formal consultation arrangements with other service providers within the Council in respect of:

- Applications for planning approval, building regulation approval and applications under the Licensing Act 2003.
- Land Charges enquiries.

### **3.9 Food and Feed Safety and Standards Promotion**

#### ***3.9.1 Food Safety Promotion***

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In addition to the educational activities carried out to support food businesses set out in 3.4 above, work is continuing to increase awareness of the importance of food safety and healthy eating amongst consumers:

Funding was obtained from the Food Standards Agency to deliver the Chartered Institute of Environmental Health "Eat Clever Campaign" to vulnerable adults within the Borough. Six courses were attended by a total of 76 people. In addition, Food Safety training was provided to 15 of the participants.

Staffing arrangements for promotional work are included in Section 3.4 above.

### ***3.9.2 Food Standards and Feeding stuffs***

- Educational work with the caterers to raise awareness of excess levels of salt, fat and sugar in takeaway meals in liaison with Environmental Health and other Trading Standards authorities across AGMA.
- Produce articles/press releases Food Standards matters from time to time.

The AGMA Food Standards Group has agreed to share information for newsletters etc thereby providing additional material at no cost.

The amount of staff resource required to carry out this work is too small to quantify as a FTE and is therefore incorporated in the time allocated to the lead officer for Food Standards and the 5 operational officers in their individual work programmes.

## **4. Resources**

### **4.1 Financial Allocation**

#### ***4.1.1 Food Safety***

The budget for Food Safety (i.e. Hygiene) is provided within the overall Environmental Control Business Unit budget. The following is an estimate of the appropriate financial allocation for this part of the service:

<b>Expenditure:</b>	<b>£</b>
Staff Salaries + associated costs	334,900
Travel etc	10,300
Supplies, consultants & purchase of samples	21,00
Departmental Recharges (24.5% of total for EH)	96,900
<b>Total</b>	<b>463,100</b>
Income:	
Legal Costs	2,100
Charges for services – sample testing	2,000
<b>Total</b>	<b>4,100</b>
<b>Net</b>	<b>459,000</b>

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### **4.1.2 Food Standards and Feeding stuffs**

Food standards and feeding stuffs work is completely integrated within the overall Trading Standards Service budget. Consequently it is difficult to calculate meaningful figures for this work. It is estimated that 20% of the overall budget is dedicated to food standards work and the following information is given as that 20%, with some adjustments where more information is known.

<b>Expenditure:</b>	<b>£</b>
Staff Salaries + associated costs	96,300
Training	280
Travel etc	2,040
Supplies & Services	5,240
Premises	2,060
Analysis	19,300
Departmental Recharges	34,220
<b>Total</b>	<b>159,440</b>
<b>Income:</b>	None
<b>Net</b>	<b>159,440</b>

## **4.2 Staffing Allocation**

### **4.2.1 Food Safety**

The establishment for food safety is as follows:

Food Safety Manager: Food Safety Specialist (office based)  
1 Senior Food Safety Officer (50% of time operational, 50% office based)  
3 EHO/Specialist Food Safety Officers  
2 Food Safety Officers (FSOs)  
1 Food Safety Promotion & Education Officer

In addition, Monitoring visits to “Broadly Compliant” Category C premises are carried out by consultants (see 3.1.1 above).

Other duties, particularly in respect of the control of infectious disease, are carried out by the Environmental Protection Team (0.3 FTE).

In terms of full time equivalents, this equates to 5.8 operational officers (+ consultants).

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### **4.2.2 Food Standards and Feeding stuffs**

The current staffing situation is as follows:

1 x Principal Trading Standards Officer is responsible for Food Standards (and other trading standards functions such as Metrology, Doorstep Crime and Advice). Duties include the management of the Food Standards function and management of 1 team of officers who are responsible for food standards enforcement work as part of their overall workload. A second Principal Officer is responsible for the day to day management of a second team of officers who are responsible for food standards enforcement work as part of their overall workload.

3 x Senior / Trading Standards Officers whose work programmes include time allocated for general inspection work, dealing with complaints and sampling; which incorporates Food Standards.

2 x Enforcement Officers qualified in Food Standards whose work programmes include time allocated for general inspection work, dealing with complaints and sampling; which incorporates Food Standards.

1 x Enforcement Officer and 1 x Admin Support Officer who are involved in the informal food sampling programme.

It is considered that staffing levels are sufficient to meet anticipated demands on the service including interventions at High and Medium risk non-compliant premises, complaints, Home Authority work, sampling, advice and promotion as detailed above. Each member of staff has a work programme setting out individual quarterly and annual targets on all the above areas of work.

Due to changes in Animal Feed legislation and specialist knowledge training requirements, work relating to the area is due to be carried by appropriately qualified officers from Lancashire Trading Standards Service.

### **4.3 Staff Development Plan**

The training and development of staff is essential to ensure that officers are able to carry out their duties effectively. Each year, officers are asked to identify their needs as far as training is concerned at Performance and Development Reviews. Managers then assess these against the needs of the service in order to ensure that the appropriate 10 hours of Continuing Professional Development training are attained.

Training for staff is provided in a number of ways:

- a) Induction training for new members of staff
- b) Courses provided by the Council's Central Training Unit
- c) Seminars provided by through the Greater Manchester Food Liaison Group
- d) Courses and seminars provided by external organisations
- e) In-house Training including team meetings
- f) Training and instruction provided on-the-job on a one-to-one basis.

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- g) Training provided by AGMA Food Standards Group
- h) Training provided by TSNW
- i) Updates provided by the FSA and LACORS.

Officers attending external courses and seminars as appropriate are expected to give a presentation to the rest of the team. This can range from a simple overview of the event to a more formal presentation providing considerable detail; including copies of handouts, etc.

### **5. Quality Assessment**

Documented procedures have been developed to verify conformance with the FSA Framework Agreement, relevant legislation, codes of practice, documented policies and procedures. These include:

- Monitoring of officers work by the Food Safety Manager and Principal Trading Standards Officer,
- Performance Indicators;
- Team meetings;
- Accompanied inspections;
- One to one meetings with officers;
- Prior approval of legal proceedings ;
- Consistency exercises;
- Identification of training needs;
- Review of documents;
- Internal audits;
- Customer Surveys;
- Review of complaints against the service;
- Inter-authority audits;
- Reality Checks.

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### 6. Performance

#### 6.1 Review Against the Service Plan

Service Managers monitor and review performance against the Service Plan on a quarterly and annual basis and monitor the work of individual officers as described in Section 5 (Quality Assessment) above.

In addition a full annual review is carried out at the end of March each year identifying any variances and presenting an improvement plan which sets out any necessary improvements/service developments.

Performance for the year 2008/2009 was as follows:

##### 6.1.1 Food Safety

Food Safety Inspections:	Requirement (FSA Code of Practice):	100% of premises due for inspection	Actual:	100%  Total number of inspections: 1038
Performance Indicator: NI 184	Food establishments "broadly compliant" with food hygiene law		Actual:	83%
Revisits:	Estimate of number likely to be required:	600	Actual:	539
Other visits (advisory etc.):			Actual:	448
Hygiene Improvement Notices served	Previous year	45	Actual	112
Food Complaints:	Estimate of number likely to be received:	60	Actual:	54
Other service requests:	Estimate of number likely to be received:	400	Actual:	494
Food samples submitted:			Actual:	238
Food Alerts:	Estimate of number likely to be received:	60	Actual:	70

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### **6.1.2 Food Standards**

<b>Category</b>	<b>No of inspections due as per FSA CoP</b>	<b>RMBC Target</b>	<b>Number achieved</b>
High Risk	31	31	31
Medium Risk	271	271	264
Low Risk	202	0	1

Revisits:	Estimate number likely to be required	20	Actual:	14
Complaints:	Estimate of number likely to be received	40	Actual:	49
Food Samples	Target	200	Actual	142

## **6.2 Identification of Any Variation from the Service Plan**

### **6.2.1 Food Safety**

None.

### **6.2.2 Food Standards**

The target number of medium risk inspections was not met. This was due to the increased workload in relation to food standards complaints and an overall trading standards increased workload in relation to NI183 problem traders. The 7 outstanding visits have been incorporated in to the intervention programme for 2009/2010.

The target number of food samples taken for composition and labelling purposes was not met. This target is not a statutory requirement of the FSA Code of Practice. As the majority of samples are taken as part of the AGMA Food Standards Group's sampling programme, this shortfall will have arisen from fewer samples being taken during routine inspections and for the reasons identified in the previous paragraph.

The Service did, however, again contribute to the FSA's national survey of imported foods, which was additional un-programmed work.

## **6.3 Areas for Improvement**

### **6.3.1 Food Safety**

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Monitoring of the inspection programme will continue with the aim that all of the work programmed is completed by the end of the year.

### ***6.3.2 Food Standards and Feeding Stuffs***

The Food Standards service is keen to continue to develop service delivery in line with the challenges brought about by the Hampton Review, Regulators' Compliance Code, new FSA Code of Practice and NI183. The Food Standards service will also consider the AGMA Public Protection Partnership business compliance project as an alternative enforcement strategy for low risk premises.

Animal Feed policies and procedures will be developed in line with new legislation, guidance issued by the Food Standards Agency and from the TSNW Agriculture Sub Group, through Lancashire Trading Standards Service.

The changes to the local authority food law enforcement monitoring system (LAEMS), that were due to be fully in place by April 2009, have been significantly delayed due to issues with national guidance and ICT software and will require further significant work on ICT systems, policies and procedures in 2009/2010.

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### **7. Appendix 1 – Regulators' Compliance Code**