

**CHILTERN DISTRICT COUNCIL  
and  
SOUTH BUCKS DISTRICT COUNCIL**

**Environmental Health Section**

**Joint Food and Health and Safety Service  
Business Plan**

**2016-2017**

# Contents

- 1.0 INTRODUCTION**
- 2.0 SERVICE AIMS & OBJECTIVES**
  - 2.1 Links to Corporate Objectives and Plans
  - 2.2 Health and Housing Service Plan
  - 2.3 Service Aims and Objectives
  - 2.4 Key Service Standards & Performance
- 3.0 BACKGROUND**
  - 3.1 Profile
  - 3.2 Organisational Structure
  - 3.3 Customers, Stakeholders & Partners
  - 3.4 Scope of the Service
  - 3.5 Demands on the Food Service
  - 3.6 Demands on the Health and Safety Service
  - 3.7 Enforcement Policy
- 4.0 SERVICE DELIVERY and REVIEW**
  - 4.1 Delivery and Priorities
  - 4.2 Food Safety Interventions
  - 4.3 Health and Safety Interventions
  - 4.4 Service Requests
  - 4.5 Accident Notifications
  - 4.6 Primary Authority Scheme
  - 4.7 Advice to Businesses
  - 4.8 Food Sampling
  - 4.9 Control & investigation of Outbreaks
  - 4.10 Food Safety Incidents
  - 4.11 Liaison with other Organisations
  - 4.12 Promotion
  - 4.13 Flexible Warrants
- 5.0 RESOURCES**
  - 5.1 Staff Allocation
  - 5.2 Staff Development Plan
  - 5.3 Financial Allocation
  - 5.4 Physical Assets
  - 5.3 Information Technology
- 6.0 QUALITY ASSESSMENT**
- 7.0 ACTION PLAN**

## 1.0 INTRODUCTION

The joint Food and Health and Safety Service Business Plan outlines the nature, objectives and influences on the services and the statutory and policy framework within which the services are delivered. It sets out the key service priorities and objectives for 2016/17 and identifies the main issues planned to be addressed during the period. It also fulfils the requirements set down by the Food Standards Agency (FSA) in its 'Framework Agreement on Local Authority Food Law Enforcement' and the Health and Safety Executive (HSE) in its 'Section 18 Guidance to Local Authorities'.

## 2.0 SERVICE AIMS AND OBJECTIVES

### 2.1 Links to Corporate Objectives and Plans

The food service strongly contributes towards the Chiltern District and South Bucks Councils' *Joint Business Plan 2015 - 2020* and *Sustainable Community Strategy, 2009-2026*, performance measures and Key Objectives:

- Delivering cost-effective, customer-focused services;
- Working towards safe and healthier local communities ; and
- Striving to conserve the environment and promote sustainability.

### 2.2 Healthy Communities Service Plan

The key objectives within the Healthy Communities Service Plan that specifically relate to the food and health and safety service for 2016/17 are:

- Improve service quality to enable communities, residents and businesses to resolve their service requests at the first point of contact or close to the first time of asking
- Provide effective and efficient regulatory services that meets customer needs
- Provide effective partnership working to protect and improve public health and environmental quality

The Division has to find substantial cost savings over the coming years, achieved by:

- Reducing costs through innovative use of technology;
- Reducing back office handling costs;
- Transferring avoidable costs of delivery along the supply chain;
- Raising income through charging for discretionary services;
- Developing the new shared service and employing lean thinking principles to review processes;
- Developing systems that will improve the ability of business to manage regulatory compliance whilst reducing the frequency of inspection by the Council.

An Environmental Health, Sustainability & Resilience service review was undertaken in 2015 with project objectives of cost savings, greater resilience and improved service quality. The outcome of the review was a single shared environmental health service between Chiltern and South Bucks District Councils with the following key features:

- a) A single team delivering a holistic service based in both Chiltern and South Bucks utilising mobile working technology to enable officers to access and retrieve information as required in external locations.
- b) A team that is able to trade with other Councils to deliver services and is structured to deliver services to businesses such as training and advice to support regulatory improvements.
- c) Administration for both Councils' areas based at Amersham supporting the delivery of the wider Healthy Communities Division.
- d) Regulatory interventions for Food and Health and Safety will be delivered through a dedicated team within Environmental Health that will also be responsible for the development of business and partnership working to improve regulatory compliance. The team whilst based at Denham will require being co-located and utilising mobile working technology to minimise additional mileage costs.
- e) A public protection team responsible for the Councils response to consultations and enforcement of all matters involving; ASB, nuisance, high hedges, and public health etc. will be required to work closely with Licensing, Planning, Community Safety and the Police and RSL's.
- f) The service will maximise opportunities for channel shift to enable customers to self-serve via the website allowing access to information or to submit data (images, forms, sound files) in relation to the particular service request.
- g) The service will also seek to deliver a 'lead officer approach' to service delivery ensuring effective communication and timely case management.
- h) The team will develop joint policies in relation to enforcement, health and safety, sustainability and business continuity.

### 2.3 Service Aims and Objectives

The Environmental Health Section has a significant role to play in improving quality of life, predominantly through providing a proactive, accessible and efficient

service that protects and promotes the health of those who work, live and visit the area. This role directly supports the Councils' Key Objective 2 (*Working towards safe and healthier local communities*).

It is the Councils' aims to:

- Support and assist businesses to become food safety compliant
- Provide consistent accurate up-to-date information aimed at providing protection to customers
- Support and assist businesses to comply with legal obligations to ensure that food is safe

The Councils will achieve this aim in the following ways:

- Targeted current relevant information to businesses
- Ensure officers are equipped with tools to effectively support businesses
- Ensure that poor performing businesses are proportionately targeted with enforcement action
- Adopt "light touch" approach to compliant businesses, organisations and customers
- Proactive campaigns to promote food hygiene ratings
- Consider innovative opportunities and approaches to working with other regulatory stakeholders to improve businesses contact with local authorities.

## 2.4 Key Service Standards and Performance

As part of the Authorities' key objectives, service standards and performance measures have been set.

Services are prioritised and resources targeted at issues of greatest concern in terms of food and health and safety. The service covers inspections of businesses, complaint and accident investigation and developing schemes to assist and motivate businesses to achieve compliance and good practice. The key corporate performance measure used is: *'Percentage of food businesses that are 'broadly compliant'* and will focus on the highest risk categories of A - C. As well as the overall percentage of businesses broadly compliant, the success of officer's interventions in moving those businesses which are not broadly compliant to becoming broadly compliant and above will also be measured and reported as a Departmental performance indicator.

Performance monitoring has been established with reports to relevant Committees, in addition to departmental monitoring meetings and to Management Team.

Food safety carries a high priority for the Authorities and the targets set for 2016/17 (91% broadly compliant businesses within the Chiltern District and 89% broadly compliant businesses within the South Bucks District) reflect that priority and ensures that the authority complies with current government guidance in measuring outcomes rather than inputs.

The Food Standards Agency will continue to collect data on broadly compliant businesses and as part of our continual service improvement; the intention is to collect data in respect of customer satisfaction following inspections.

As a consequence of Government's aims for health and safety reform including reducing the inspection burden on business and focussing on better health and safety outcomes, proactive inspections will be targeted at high risk premises where the national priorities identifies them as being an at risk group or local intelligence identifies businesses with poor compliance records.

### **3.0 BACKGROUND**

#### **3.1 Profile**

The Chiltern District is located in the centre of the Chiltern Hills, approximately 25 miles North West of London. The District covers an area of 19,635 hectares and has a population of approximately 92,635. It is predominantly a rural area with towns and villages set in countryside which is part of the greenbelt around London. A large part of the District forms part of the Chilterns Area of Outstanding Natural Beauty.

The South Bucks District covers an area of 14,150 hectares immediately to the west of Greater London with a population of approx. 62,000. The district is mainly rural in nature and large areas are within the Greater London Green Belt. The main towns in the district are Beaconsfield, Gerrards Cross Denham, Iver and Burnham.

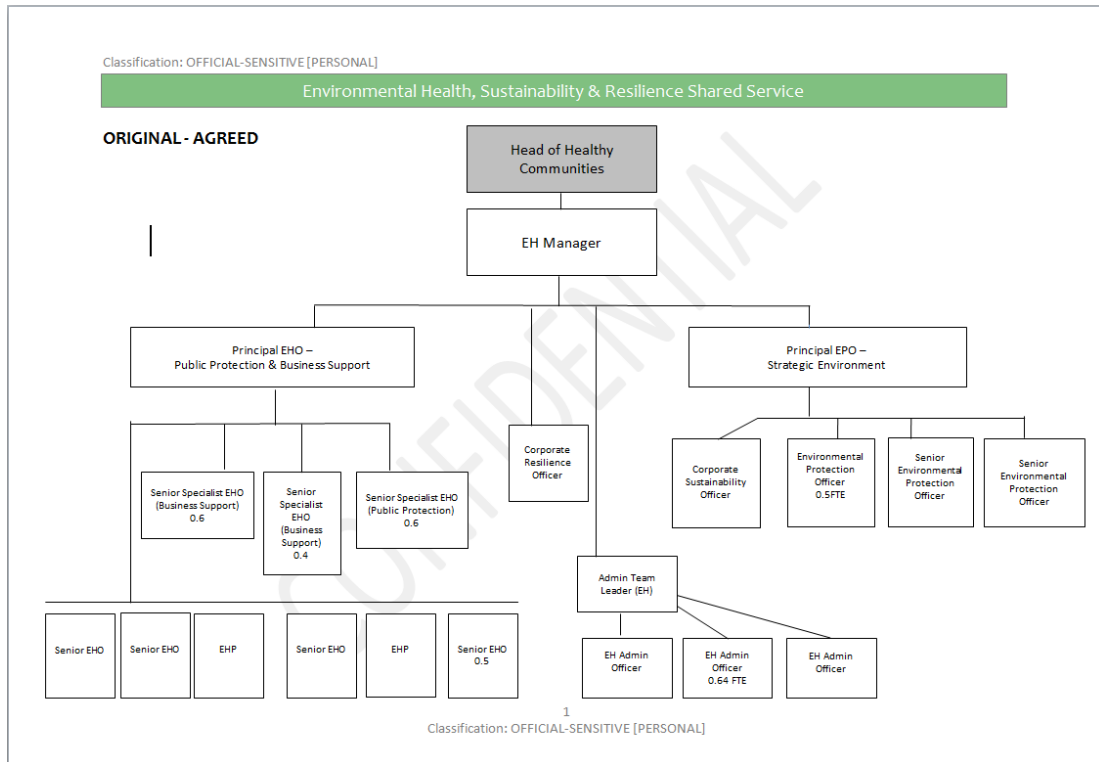
Both Districts have good transport links with adjoining areas. Both areas are served by good national and motorway networks. Direct rail-links to central London or Northwest to Aylesbury or High Wycombe and the Midlands are provided by Chiltern Railways, Great Western Railways and London Underground Ltd.

#### **3.2 Organisational Structure**

Since April 2014, a shared senior management structure has been created between Chiltern District Council and South Bucks District Council, comprising an acting Chief Executive, directors and heads of service. The Head of Healthy Communities is the head of service for environmental health across both authorities and reports to the Director of Services. The shared environmental health service came into effect on 1<sup>st</sup> December 2015 with the service being delivered from both Council offices. The food and health and safety service is delivered by specialist Environmental Health Officers within a single Business Support Team. Health promotion is delivered by the Community Team who provide links to community development, adult learning and Learning and Skills although the Business Support Team will have an increasing role in delivering promotional activities.

As of the March 2015, the Healthy Communities Division (inclusive of housing and licensing) comprised of 35.1 full time equivalents. The Division also employs specialist officers for Housing, Environmental Protection, Licensing, Emergency

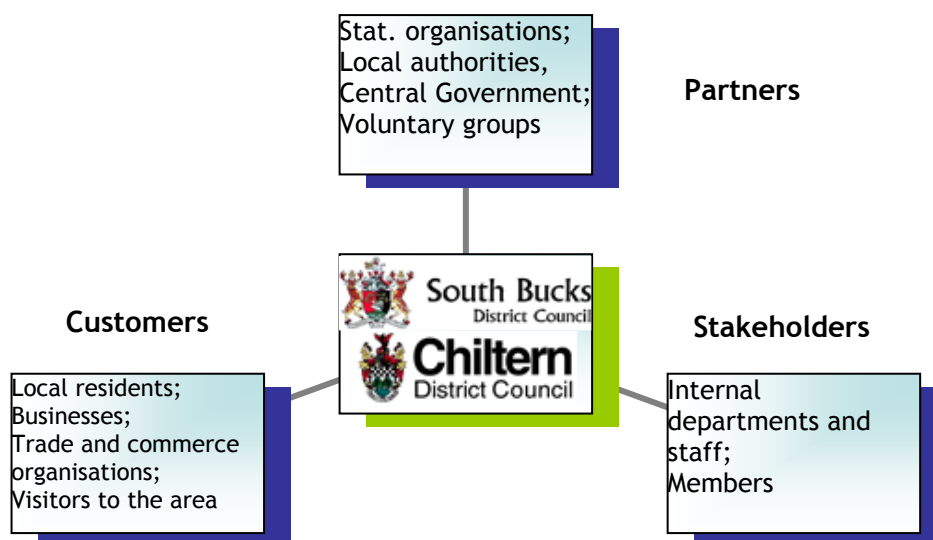
Planning and Business Continuity and Corporate Health and Safety, supported by a central administration team. In addition, the pest control service is provided on a contracted basis.



Dr Jill Morris is the appointed Consultant in Communicable Disease Control at Thames Valley Public Health England and is the 'Proper Officer' for the Authority.

The specialist officer for food safety as required by the Code of Practice is shared between the Principal Environmental Health Officer and a job shared Senior Specialist EHO post, and the Public Analyst is Anne Scarett at Hampshire Scientific Services.

### 3.3 Customers, Stakeholders and Partners



### 3.4 Scope of the Service

#### 3.4.1 The scope of the service is:

- i) The enforcement of legislation relating to safety, welfare and hygiene;
- ii) Routine auditing of businesses in accordance with current Government requirements;
- iii) Providing support, training and advice for food handlers and businesses, either free of charge or as part of a paid for advice service;
- iv) Investigation of consumer complaints relating to food safety and hygiene;
- v) Investigation of employee and public complaints and requests for information relating to working environments and standards;
- vi) Investigation of reportable accidents;
- vii) Health education and promotional activities to educate the consumer.

#### 3.4.2 The scope of infectious disease control aspects of the service are:

- i) Investigation of sporadic cases and outbreaks of infectious disease within the District, in consultation with the Consultant in Communicable Disease Control;
- ii) Health education/promotion activities;
- iii) Drawing up and implementing appropriate contingency outbreak control plans;

In addition, officers also enforce the smoke-free provisions and contribute to the Safety Advisory Group.

### 3.5 Demands on the Food Service

As at 1st April 2016 there were 801 food premises requiring inspection in the Chiltern District and 552 in the South Bucks District. The premises profile is given



in Table 1, whilst the number of premises falling into each risk category is given in Table 2 below. Classification of premises is in compliance with Food Standards Agency Code of Practice. Category A businesses, either because of the nature of their operation or poor standards of hygiene, pose a greater risk than category E. Those premises within category E are subject to an alternative enforcement strategy which takes the form of a self-assessment questionnaire. Similarly, a Category D premise will alternate every 24 months between an inspection and self-assessment questionnaire. Category C premises that are broadly compliant will have a monitoring visit every other visit. Non-rated businesses are those whose risk rating has not yet been assessed.

Table 1 Number of establishments by premise type

Premises Type	Primary producers	Manufacturers and packers	Importer Exporter	Distributor	Retailer	Caterers
Number (Chiltern DC)	4	17	7	15	141	617
Number (South Bucks DC)	3	12	1	3	116	417

Table 2 Number of premises falling into risk categories

	A	B	C	D	E	Non - rated	Outside programme	Total
Number of premises (Chiltern DC)	3	23	198	177	380	11	9	801
Number of premises (South Bucks DC)	1	20	132	221	169	6	3	552
Interval between inspections (months)	6	12	18	24	AES			

- AES - Alternative Enforcement Strategy

Within the premises profile, there are five food businesses that are approved, an increase of 70% from the previous year.

One of the strengths of the service is that of promoting and educating food businesses. This tends to be targeted at new businesses and those businesses that have got a history of poor hygiene standards and has proved effective in raising and maintaining standards. Those with a food hygiene rating of 0-2 are particularly targeted.

### 3.6 Demands on the Health and Safety Service

As at 1st April 2016 there were 2007 premises within the Chiltern District and 945 within the South Bucks District which are eligible for health and safety enforcement. Classification of premises is in compliance with Health and Safety

Executive/Local Authorities Enforcement Liaison Committee (HELA) Local Authority circular (LAC) 67/2 (rev5).

The assessment of the risk rating is dependent upon the identified health and safety hazards and their associated risks and the ability and confidence in the management to control them.

The service is delivered from both the Council offices in Amersham and Denham during normal office hours of 9.00 - 17.30. It is recognised that businesses operate outside normal office hours of work and so the inspection programme will take this into account. Officers are therefore expected to work outside these hours when circumstances require, for example, for food poisoning investigations and accident investigations, where the nature of the business dictates evening or early morning visits and upon request by businesses.

### **3.7 Enforcement Policy**

The Healthy Communities Division has a generic enforcement policy that covers the majority of the work performed by the Division. However a more specific enforcement policy has been adopted and is detailed within the Food and Health and Safety Enforcement Policies, together with Enforcement Procedures that set out the actions to be taken when formal action is required.

Regard is given to the Regulator's Code published by the Department for Business Enterprise and Regulatory Reform and the Primary Authority Scheme.

## **4.0 SERVICE DELIVERY and REVIEW**

### **4.1 Delivery and Priorities - 2016/17**

The service will be delivered through:

- i) Routine programmed inspection of food businesses, with a frequency determined by a risk assessment, with appropriate follow-up action;
- ii) Proactive targeted inspections of businesses and service sectors where there is likely to be a greater risk of injury from those activities identified by national accident statistics and local intelligence with appropriate follow-up action.
- iii) Assessment of relevant food hygiene premises to determine their food hygiene score in terms of the national Food Hygiene Rating Scheme and which will be published on the Food Standards Agency website;
- iv) Routine self-assessment questionnaires to low risk premises;
- v) Investigation of complaints with appropriate follow-up action;
- vi) Investigation of accidents with appropriate follow-up action
- vii) Participation in national and local sampling programmes;
- viii) Appropriate training, development and monitoring of officers;
- ix) Provision of information, coaching and advice to businesses about legal requirements and good practices;
- x) Provision of relevant food safety courses for food handlers and a chargeable advice service to businesses;
- xi) Promotional activities to inform and encourage high standards in businesses;
- xii) Promotional activities to educate the consumer in food hygiene and safety.

Priority will be given to targeting those activities that pose the greatest risk to the members of the public and employees:

- i) the correct and uniform identification of high-risk areas during programmed inspections and as a result of complaint and accident investigation and to concentrate efforts to reduce these risks;
- ii) focussing enforcement efforts on those businesses who pose the greatest risks e.g. those that are not broadly compliant;
- iii) ensuring efforts are focussed on persistent offenders;
- iv) ensuring compliance with the law and;
- v) engaging in those promotional activities for businesses and consumers, which are most likely to foster improved safety.

Revisits to businesses will be undertaken in accordance with the relevant policy.

## 4.2 Food Safety Interventions

The policy relating to the inspection of food premises is detailed in the Food Policy.

The number of premises programmed for inspection in 2016/17 has the following profile:

Risk category	A	B	C	D	E Alternative Enforcement Strategy	Non-rated	TOTAL
Number (Chiltern DC)	2	23	130	64	109	0	328
Number (South Bucks DC)	1	18	73	131	34		257

Currently 96% of food businesses in the Chiltern District and South Bucks District are broadly compliant with legislation. This is an increase on the previous year of 90%. Those that are not broadly compliant will be subject to full inspections and included within the food sampling programme.

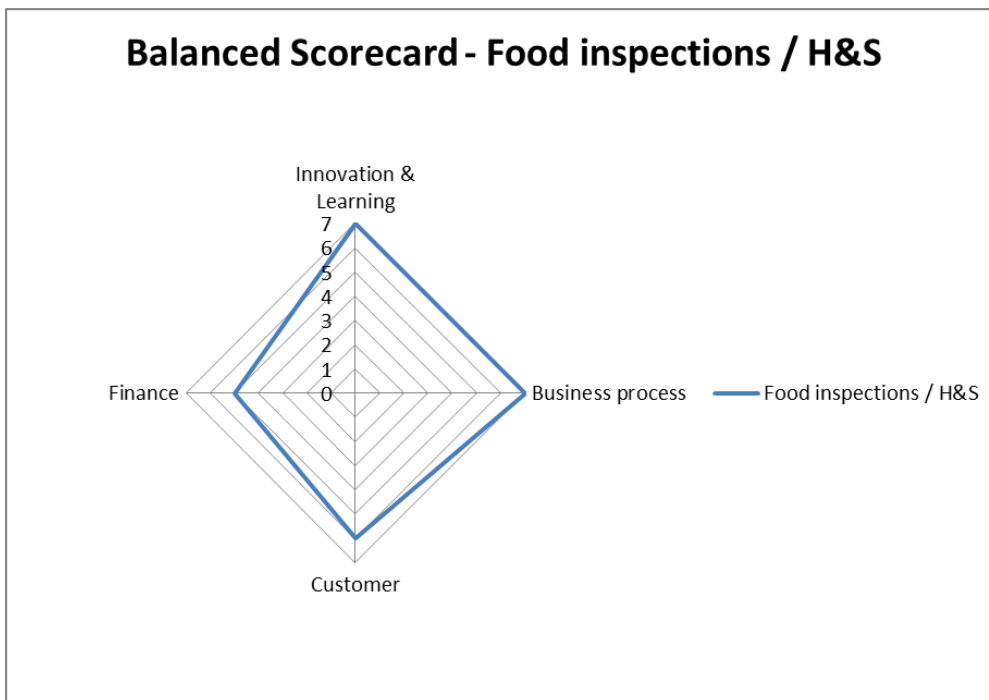
A self-assessment scheme is undertaken for the lower risk premises whereby a questionnaire is sent to the business and on return an assessment is made as to its continued business use and risk. Dependent upon the outcome, the business will either be inspected or re-assessed in three years' time. In creating more efficient, customer focused services, these questionnaires are sent out by email and an online form has been produced which enables easy completion and submission.

The revised Code of Practice introduced the opportunity to carry out alternative interventions where it is found that standards of food safety are generally good and do not warrant a full or partial inspection. Category A, B and C premises which are

rated as being not broadly compliant businesses will be subject to full inspection whilst category C and D food businesses that are broadly compliant could be subject to alternative interventions alternating with full inspections every 18 months and 2 years respectively.

During 2015, an Environmental Health service review took place with the aim of improving service quality and resilience and identifying potential savings through sharing services between Chiltern DC and South Bucks DC. A shared Environmental Health, Sustainability & Resilience service came into effect on 1<sup>st</sup> December 2015 that introduced a new structure and incorporated a specific Business Support Team whose role it would be to deliver Official Control interventions, respond to food and health and safety related complaints and accidents and to provide training and support for local businesses. Previously these functions were delivered by generic EHOs who also responded to environmental protection service requests. The new structure will enable officers to develop more specialist knowledge and expertise in food hygiene and health and safety and to provide the capacity to develop tools to support businesses to improve standards and contribute to local economic growth, Additionally, income generation opportunities will be explored in the delivery of training courses and advice to businesses outside of the Chiltern and South Bucks areas and in providing support for other local authorities.

A scoping exercise was undertaken and a balanced scorecard produced which identified the strengths and weaknesses of the Business Support service. This identified that the team was strong on business process and innovation but needed to improve in terms of finance, e.g. identifying income generation opportunities and making best use of resources. Additionally it was identified that more work could be done to tailor advice and guidance to business needs and to develop improved collaboration with trade representatives and organisations.



During 2016/17, the focus will be on the successful implementation of the shared service. To this end, policies and procedures of both authorities will be reviewed and developed, taking the best practice from each. Opportunities to look for external best practice will also be taken. This service plan and accompanying enforcement policies is the first step towards integrating the two services in

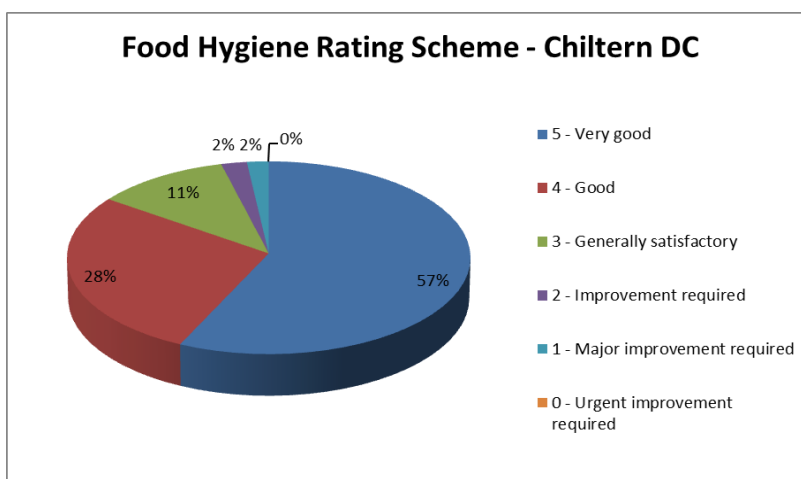
providing not only a more effective and efficient service, but also improving the service delivered to businesses, both in terms of targeted advice and consistent and effective enforcement.

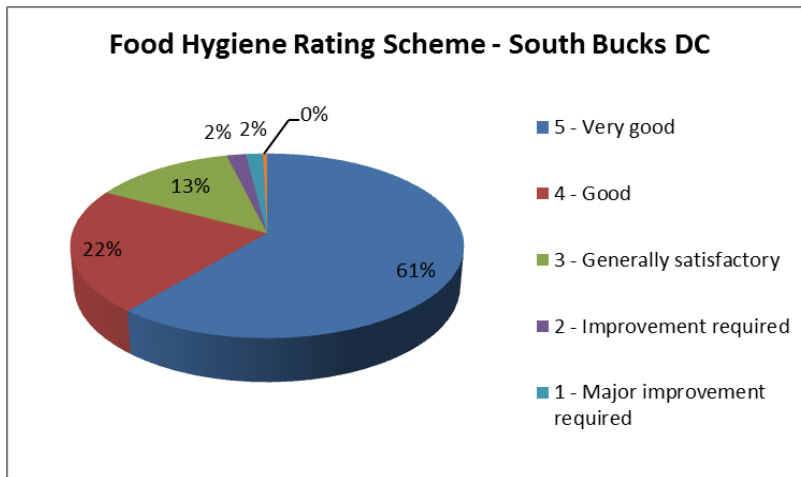
As part of an ongoing programme of service transformation, improved and more efficient and effective ways of working and delivering the service will be explored using ‘lean thinking’ principles to increase capacity to more effectively deal with non-compliant food businesses. This will be augmented by a corporate mobile working project across both authorities.

The national Food Hygiene Rating Scheme (FHRS) continues to be well received by both the public and businesses. The number of re-inspections has increased; businesses requesting a re-inspection to improve their rating following works being done. Chiltern DC participated in the FSA’s research into why high rated businesses still did not display their rating. This comprised of premises checks and one-to-one conversations with proprietors to identify why they did not display their rating sticker. The table below shows the initial percentage of businesses displaying the sticker and the percentage after staff intervention. The research identified a number of reasons for not displaying but primarily, proprietors thought that anything below a 5 was not good enough to display and which might therefore have an impact on their business as customers may choose somewhere with a higher rating. Even though this was the expectation, those businesses did not then request a re-rating of their business. Officers were of the opinion that it was unlikely that these proprietors would voluntarily display their food hygiene ratings.

Rating	5	4	3
% businesses displayed in scope at start of project	54%	65%	29%
% businesses displayed in scope at end of project	88%	79%	60%

The graph below shows the percentage breakdown of food hygiene rating distribution across all food businesses within each authority. The aim is to increase those businesses that achieve a 5 rating to above the national average.





### 4.3 Health and Safety Interventions

In the Government Report “*Good Health and Safety, Good for Everyone*”, following Professor Lofstedt’s review of health and safety legislation, protecting people in the workplace and wider society is still a Government key priority whilst reducing the inspection burden on businesses. The Government’s aim is to improve the targeting of relevant and effective interventions and preserving inspection for higher risk premises and issues.

The HSE have launched their new strategy for health and safety ‘*Helping Great Britain Work Well*’ which sets out 6 key themes:

**Helping Great Britain work well**

A new strategy for health and safety  
**The six key areas**

<p><b>Acting together</b> Promoting broader ownership of health and safety in Great Britain</p>	<p><b>Supporting small employers</b> Giving SMEs simple advice so they know what they have to do</p>
<p><b>Tackling ill health</b> Highlighting and tackling the costs of work-related ill health</p>	<p><b>Keeping pace with change</b> Anticipating and tackling new health and safety challenges</p>
<p><b>Managing risk well</b> Simplifying risk management and helping business to grow</p>	<p><b>Sharing our success</b> Promoting the benefits of Great Britain’s world-class health and safety system</p>

List of activities/sectors for proactive inspection by LAs <sup>1</sup> – only these activities falling within these sectors or types of organisation should be subject to proactive inspection			
No	Hazards	High Risk Sectors	High Risk Activities
1	Legionella infection	Premises with cooling towers/evaporative condensers	Lack of suitable legionella control measures
2	Explosion caused by leaking LPG	Premises (including caravan parks) with buried metal LPG pipework	Buried metal LPG pipe work (For caravan parks to communal/amenity blocks only)
3	E.coli/ Cryptosporidium infection esp. in children	Open Farms/Animal Visitor Attractions <sup>2</sup>	Lack of suitable micro-organism control measures
4	Fatalities/injuries resulting from being struck by vehicles	High volume <sup>3</sup> Warehousing/Distribution	Workplace transport
5	Fatalities/injuries resulting from falls from height/ amputation and crushing injuries	Industrial retail/wholesale premises e.g. steel stockholders, builders/timber merchants	Workplace transport/work at height/cutting machinery/lifting equipment
6	Industrial diseases (occupational deafness/cancer/ respiratory diseases)	Industrial retail/wholesale premises e.g. steel stockholders, builders/timber merchants/ in-store/craft bakeries <sup>4</sup> , stone wholesalers <sup>5</sup>	Noise (steel stockholders), use of loose flour(in-store/craft bakeries <sup>4</sup> ), exposure to respirable crystalline silica (outlets cutting/shaping their own stone)
7	Falls from height	High volume <sup>3</sup> Warehousing/Distribution	Work at height
8	Crowd control & injuries/fatalities to the public	Large scale public gatherings e.g. cultural events, sports, festivals & live music	Lack of suitable planning, management and monitoring of the risks arising from crowd movement and behaviour as they arrive, leave and move around a venue
9	Carbon monoxide poisoning	Commercial catering premises using solid fuel cooking equipment	Lack of suitable ventilation and/or unsafe appliances
10	Violence at work	Premises with vulnerable working conditions (lone/night working/cash handling e.g. betting shops/off-licences/hospitality <sup>5</sup> ) and where intelligence indicates that risks are not being effectively managed	Lack of suitable security measures/procedures. Operating where police/licensing authorities advise there are local factors increasing the risk of violence at work e.g. located in a high crime area, or similar local establishments have been recently targeted as part of a criminal campaign

To support the strategy, guidance has been published for local authorities (LAC 67/2 (rev 5)) to aid the prioritisation of health and safety interventions. This identifies the national priorities based upon accident statistics and the associated high risk activities and business sectors which will form the focus of our work during 2016/17. The guidance is clear, however that there should not be an inspection without a reason and that other alternative interventions may be more suitable, for example advisory visits, publicity campaigns and seminars.

In 2015, three fatalities were reported to Chiltern DC and resulted in Coroner's Inquests. As a consequence,

projects will be developed relating to health and safety measures to protect employees from falls from height and workplace transport accidents and raising awareness of the importance of communication between landlords and tenants and in particular maintenance responsibilities and reporting.

In 2015, in partnership with Public Health England, we participated in an educational campaign aimed at informing leisure centres and schools of the need to undertake suitable risk assessments for *Cryptosporidium*.

Category B and C premises will not form part of the inspection programme and so will not be subject to any proactive interventions unless they come within one of the priority subject areas or local intelligence suggests the need for targeted interventions.

#### 4.4 Service Requests

The Food and Health and Safety Enforcement Policies detail the policy relating to the investigation of complaints, whether they are about hygiene standards at premises, complaints about food purchased within the Districts, safety standards at premises or welfare issues. In 2015/16 across both authorities, 61 food related service requests were received, 44 concerning the hygiene of premises and 17 in

relation to food itself. Of the 84 health and safety related service requests, 15 were requesting advice whilst 16 concerned standards at premises. Both Chiltern and South Bucks Councils have established Safety Advisory Groups, the purpose of which is to collate information about an event to enable the emergency services to gauge its potential impact upon the local community and to identify beforehand any issues or concerns which may potentially arise. In 2015/16 124 consultations were held for a variety of events.

#### 4.5 Accident Notifications

Under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013, employers and self-employed are required to notify the enforcing authority of any notifiable injury etc. The table below indicates the level of accident notifications for 2015/16. The policy for the investigation of accidents is detailed in the Health and Safety Enforcement Policy and accidents are investigated according to the criteria within it.

Number of accidents 2015/16

Type of Accident	2015/16 Chiltern DC	2015/16 South Bucks DC
Fatal Injuries	2	0
Non-fatal major injuries	0	0
Over 7 day injuries	26	16
Public injuries	29	23
Total	57	39

#### 4.6 Primary Authority Scheme

In July 2009, the Regulatory Enforcement and Sanctions Act introduced the concept of a 'Primary Authority' for the majority of regulatory functions. At the request of a business, a local authority is compelled to act as that company's Primary Authority. The role of the Primary Authority will be to act as a point of contact for other local authorities on policy issues, inspection programmes and when considering taking any enforcement action. The Primary Authority is able to prohibit that local authority from taking their enforcement action subject to an appeal process to the Better Regulation Delivery Office against the decision of the primary authority. The newly formed Business Support Team will actively pursue primary authority partnerships with local businesses and trade associations.

#### 4.7 Advice to Businesses



**E. coli Control of Cross Contamination Fact Sheet and Hygiene Rating Improver No. 4**



Cross contamination is the most common cause of food poisoning. It happens when harmful bacteria are spread onto food from either food sources (known as direct cross-contamination) or from surfaces, hands or equipment including cleaning equipment that has been contaminated (known as indirect contamination).

**Examples of food sources and surfaces that can result in cross-contamination**



**Sources of E coli** - Raw meat, fresh fruit and vegetables (these can be contaminated by the soil in which they grow), raw milk and untreated water supplies. The key measures to control cross-contamination are described on the next page.

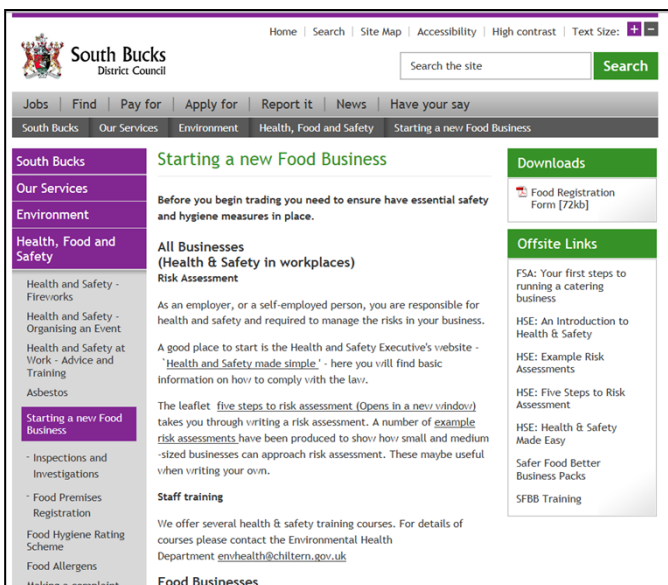
The authority is committed to ensuring that businesses are aware of the requirements of the law and good practice, and will wherever resources permit, provide advice to assist businesses. Information fact sheets have been developed for businesses which have received positive attention from other authorities.

Greater links with local Chambers of Commerce and the Buckinghamshire Thames Valley Local Enterprise Partnership will be forged to support existing and new businesses and to improve awareness of the services Environmental Health can provide. For businesses, and in particular new start-ups, a 'one-stop' approach to regulatory services and compliance will be established in a bid to minimise the number of hand-ons a business may experience.

The feasibility of providing a chargeable advice service will be explored aimed at new and existing businesses to support them in achieving higher standards of safety and compliance.

Eight Level 2 'Award in Food Safety in Catering' courses are planned each year delivered at Chiltern DC by an external tutor. Chiltern DC staff administer the course provision and manage the bookings and payment. Chiltern DC retains the net income. In South Bucks DC courses are provided by an external tutor who uses a room at the South Bucks offices free of charge and administers the course herself. No income is received. Therefore, in 2016, the provision of courses will be reviewed in terms of their most cost effective delivery and types of courses/training provided to businesses. All courses are accredited by QCA and the Chartered Institute of Environmental Health. These courses can also to be run for organisations at their premises upon request. The Section is also able to provide the CIEH Level 2 Award in Health and Safety in the Workplace; CIEH Risk Assessment Principles and Practice and CIEH Principles of Manual Handling.

In addition to advice being given to businesses, information is also provided for the public in the form of information on the website and participation in National campaigns. As part of the inspection service review, the Environmental Health websites of both authorities



The screenshot shows the South Bucks District Council website. The main heading is "Starting a new Food Business". Below this, it states: "Before you begin trading you need to ensure have essential safety and hygiene measures in place." It then lists "All Businesses (Health & Safety in workplaces) Risk Assessment" and provides information about employer responsibilities and resources like "Health and Safety made simple". There are also sections for "Staff training" and "Food Businesses (Food hygiene requirements)". A sidebar on the left contains navigation links like "Jobs", "Find", "Pay for", etc. A right sidebar contains "Downloads" (Food Registration Form) and "Offsite Links" (FSA, HSE, Safer Food Better Business Packs).

have undergone significant development.

#### 4.8 Food Sampling

The policy in relation to sampling is detailed in the Food Policy and covers sampling of food, water and faecal and food samples as part of food poisoning investigations.

An annual sampling programme has been drawn up to cover:

- i) Water - private supplies;
- ii) Food products manufactured locally;
- iii) National and regional co-ordinated sampling;
- iv) Imported foods;
- v) Locally co-ordinated sampling.

The sampling programme is based on the following objectives and an assessment of the potential risks associated with the particular activity:

- i) To obtain recognised and usable microbiological standards for foods, via a nationally co-ordinated sampling programme;
- ii) To fulfil legal and government driven obligations;
- iii) To monitor those businesses whose standards of hygiene are less than satisfactory;
- iv) To check that foods comply with statutory microbiological standards, where available;
- v) To check that locally manufactured and handled foods are microbiologically safe;
- vi) To identify specific foodstuffs which are more likely to be microbiologically unsound.

It is recognised that good co-operation and co-ordination at a national and local level is necessary to achieve such objectives and the authorities are committed to:

- i) Participating in and co-operating with the Public Health England and Food Standards Agency's national sampling schemes;
- ii) Co-ordinating with adjoining local authorities and local PHE to agree locally co-ordinated sampling;
- iii) Ensuring 10% of samples come from third country imported foodstuffs, in line with the Food Standards Agency requirements.

Sampling is also performed on an adhoc basis as necessary, generally in response to a complaint from a member of the public, as part of a food poisoning outbreak or during a routine inspection. Where officers identify poor practices during inspections these will be incorporated into the sampling programme and inform future inspection approaches.

As part of the revised inspection processes the use of ATP analysis of hand and food contact surfaces provides rapid assessments of cleanliness and cross contamination. As well as demonstrating potential failures in hygiene arrangements, the visual nature of these tests also aids the educational aspect of the inspection.

Samples for microbiological analysis continue to be taken to the PHE laboratory at Colindale, London. The UK Food Surveillance System (UKFSS) is used to facilitate the electronic submission of samples data and receipt of results to a national database hosted by the FSA. Routine private water supply samples for chemical

analysis are sent to Affinity Water and samples for examination will go to the Public Analyst.

#### 4.9 Control and Investigation of Outbreaks and Food Related Infectious Disease

The policy for dealing with food related diseases is to:

*“Prevent the spread of notifiable infectious disease in the community and particularly reduce outbreaks of food poisoning.”*

a) To investigate all outbreaks of notifiable disease within the Districts in co-operation with Public Health England.

- i) to identify the cause of infection;
- ii) to prevent the spread of infection;
- iii) to educate and prevent re-occurrence.

b) Promote the training of food handlers.

Procedures have been developed in consultation with the Consultant in Communicable Disease Control and Thames Valley PHE Centre. These, together with the appropriate outbreak control plans are reviewed on a regular basis.

For 2015/16 110 sporadic cases of food related infectious disease were investigated across both authorities, a reduction of 25% from the previous year. All notified cases are followed up to identify the source and cause, and to establish whether the case is within a high-risk group. The number of food poisoning outbreaks investigated during the past year remains low. Such outbreaks involve a considerable amount of time and effort to investigate and control and as a consequence, other proactive work tends to be held in abeyance until the outbreak is concluded.

A major food poisoning outbreak was investigated in the Chiltern District from an event attended by 434 people. Of these 43 developed symptoms of vomiting and diarrhoea within 12 hours of eating the main course. Despite an extensive investigation, no causative organism or vehicle of transmission was identified.

#### 4.10 Food Safety Incidents

Food Alerts are the Food Standards Agency's way of informing local authorities and consumers about problems associated with food and, in some cases, provide details of specific action to be taken. They are often issued in conjunction with a product withdrawal or recall by a manufacturer, retailer or distributor. Officers will carry out action specified in the Food Alert as instructed and in the most appropriate, expeditious and cost effective manner possible to safeguard public health. Action will be taken in accordance with guidance issued by central government. Action taken in relation to food alerts associated with chemical contamination will be in consultation with Buckinghamshire and Surrey Trading Standards.

Rapid Alert System for Food and Feed (RASFF) is primarily a tool to exchange information between competent authorities on consignments of imported food and feed in cases where a risk to human health has been identified and measures have

been taken. As with the food alert officers will carry out any action specified in the RASFF.

If a Food Alert or RASFF needs to be issued following complaints or issues arise as part of the routine inspection programme, the guidance in the Code of Practice will be followed.

When necessary, the Consultant in Communicable Disease Control and Public Analyst will be consulted and advice sought as to the public health significance of particular issues. Specialist experts will also be called upon as necessary. Appropriate resources will be allocated to resolving any food safety incident and alternative measures taken to deal with other work.

In 2015/16, 79 Food Alerts were issued by the Food Standards Agency, the majority of which were for information. In instances where action was required of the local authority, contact was made either by contacting food businesses directly or visiting.

#### **4.11 Liaison with other Organisations**

The Authorities have a number of formalised liaison arrangements with various public bodies and neighbouring local authorities. These include:

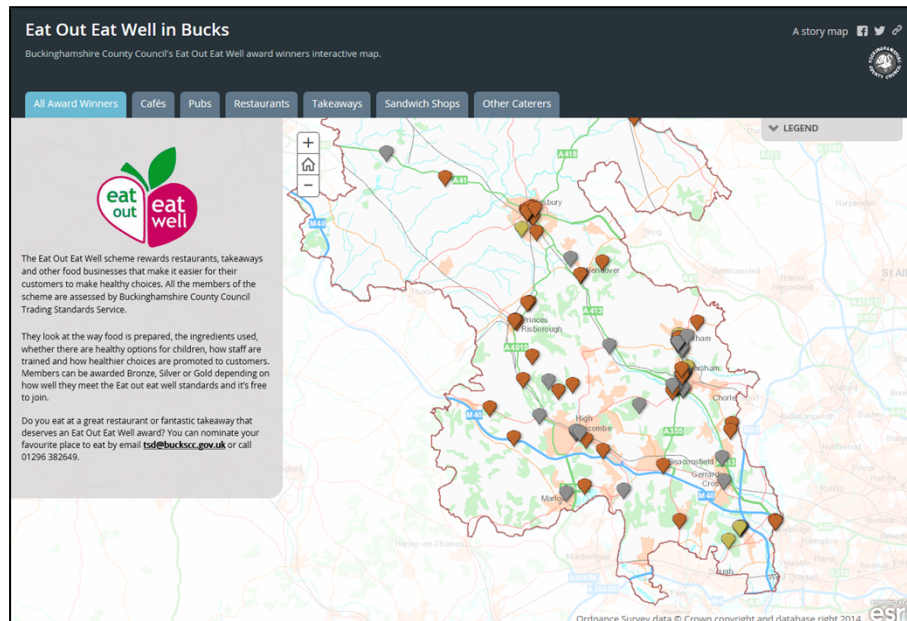
- i) Buckinghamshire Food and Health and Safety Liaison Groups - bi-monthly meetings to discuss current enforcement issues and to develop action plans to progress food and health and safety promotion and enforcement. Also in attendance are representatives from Trading Standards to discuss joint initiatives and the Quality Manager from the PHE, Colindale to discuss sampling results and programmes and the Health and Safety Executive.
- ii) Thames Valley PHE Centre - meetings to discuss current infectious disease issues and to progress initiatives in outbreak control.
- iii) Chiltern District Council and South Bucks District Council Safety Advisory Group - meetings with event organisers to discuss event safety management and to highlight issues of particular concern.
- iv) Thames Water Utilities and Affinity Water - 6 monthly meetings to discuss current developments in water quality and monitoring and to develop closer links between organisations.
- v) The Division also has links with other Council services e.g. Planning and Building Control regarding new applications and Engineers regarding complaints.

#### **4.12 Promotion**

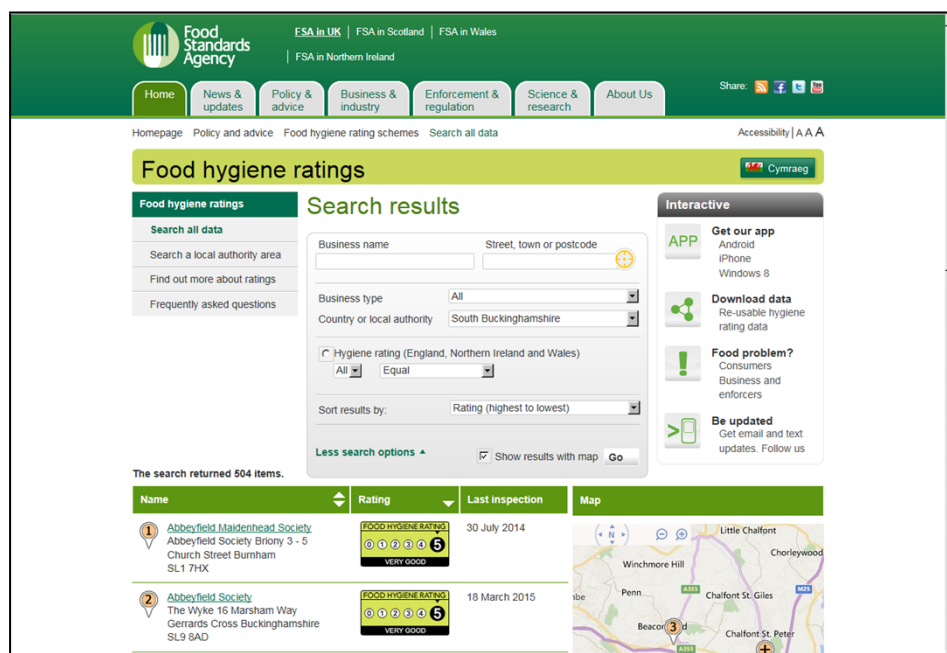
The value of safety promotions is recognised as an effective way of conveying safety information to both public and businesses and as a means to raising standards. Therefore officers actively participate in a number of promotions. These include Food Safety Week, Health and Safety Week and other local promotions organised on an adhoc basis through the Buckinghamshire Liaison Groups.

In 2015/16, officers publicised Food Safety Week using a variety of social media tools which, for the past couple of years has focussed on the risks from *Campylobacter* in the home and in particular the safe preparation and cooking of chicken. In 2016, the focus will be on food waste and so officers will work with the Waste Management Team to promote and publicise this campaign. Officers will also promote food hygiene at other times during the year at events such as the Senior Wellbeing Fair.

In 2014, Bucks Trading Standards introduced an ‘Eat Out, Eat Well’ scheme for businesses aimed at promoting healthier food choices for consumers and staff actively promote this scheme during their hygiene inspections.



The national Food Hygiene Rating Scheme shows how well food businesses are complying with food hygiene law. The scheme applies to all caterers and retailers handling and preparing open food to the public. The food business is given a sticker to display that shows their food hygiene rating out of 5. The ratings are made



publicly available on a national website so that customers can make informed choices about the places where they eat out and purchase food, and through this, to encourage businesses to improve hygiene standards. Businesses are encouraged to display their rating.

## **5.0 RESOURCES**

### **5.1 Staffing allocation**

As a consequence of the Environmental Health shared service review, the departmental structure has significantly changed, creating a designated Business Support Team who are responsible for undertaking food safety and health and safety interventions, investigations of accidents and hygiene complaints, food poisoning outbreaks and sporadic infectious disease cases and provide support and advice to businesses and the primary authority partnership scheme. The Team is comprised of Principal Environmental Health Officer, a job shared Senior Specialist Environmental Health Officer post and , who, with the Principal EHO jointly act as the Lead officers for food and health and safety and 2.6 Environmental Health Officers, supported by 0.1 FTE Administrative Officers. Additional Environmental Health Officer resources will be deployed from the Public Protection team as required.

All officers are authorised in accordance with an assessment of their individual competencies and qualifications and in accordance with the FSA Code of Practice and Section 18. A record of authorisation for each individual is kept and any training and competency issues are dealt with throughout the year.

Contractors engaged in food or safety interventions will be appointed and authorised in accordance with the authorisation procedures and must demonstrate their competence to the satisfaction of the relevant codes of practice. During 2015 a consultant was employed to undertake food hygiene inspections across both authorities.

### **5.2 Staff Development Plan**

The Authorities are members of the Investors in People (IIP) Scheme and are regularly appraised through audit of its membership.

The Food Standards Agency, as part of their revision of the Code of Practice, has introduced a Competency Framework for officers who are responsible for undertaking official controls. All officers authorised to carry out official control interventions will be required to complete the Competency Framework and any gaps will form part of their personal development plan.

The Staff Development Plan serves to identify the training and development activities required enabling officers to perform their duties in an efficient and effective manner. Not only does the Plan reflect the business needs of the Division, it also provides for the personal development of individual officers. The Food Standards agency's Competency Framework has been used to identify individual competencies and training and knowledge gaps.

All training undertaken is reviewed as to its usefulness and practical applications and feedback to other officers is done as necessary.

All staff are appraised on an annual basis at which time any training needs are identified and incorporated into the Staff Development Plan. Additionally, throughout the year, core courses are identified and staff allocated to attend as necessary.

Each officer is allocated individual aims and objectives. These comprise of general performance objectives relating to standards of work and targets to be achieved and more specific 'projects' pertinent to their work and the overall aims of the service. These are reviewed on an on-going basis and as part of the annual appraisal.

### **5.3 Financial Allocation**

The budget for the food service is comprised of a number of elements, the greatest of which is staffing costs. This is followed by support services comprised of costs for administration, corporate services (mainly financial income administration), office running costs and internal health and safety. Legal charges are based on the actual work that is performed and a contingency is available for expert advice. The budget for food and health and safety work across both authorities is £273,700.

A separate budget for sampling has been allocated which is available for food complaint analysis and other sampling work, e.g. for chemical analysis of food or water.

Microbiological analysis is undertaken by the PHE who has agreed an allocation of sampling units based on one food sampling unit per 1000 head residential population. Due to the extensive sampling programme, the Division tends to use its allocation of food sampling units.

### **5.4 Physical Assets**

The officers involved in the food service are provided with any equipment that is deemed necessary for them to carry out their duties effectively and efficiently. A record of equipment allocated to staff is listed in an equipment inventory, which also includes a record of the necessary calibration and service checks. The value of these assets costed on a replacement value is estimated to be in the order of £2000.

### **5.5 Information Technology**

The Division operates the Uniform database and management system supplied by IDOX and is used to log complaints, investigations and inspections. The system interfaces with the corporate Geographical Information System (GIS) and is based on the Local Land and Property Gazetteer. We also use Laserforms to provide consistency in enforcement notices.

All documents are scanned and linked to the Uniform record using the IDOX Electronic Document Management System which provides a more efficient management of information and data and improved access to information and business history. Additionally, the use of online application forms and payments improves both access to services by residents and businesses and efficiency. A corporate mobile working project will be implemented during 2016 which will facilitate more efficient working across both authorities.

The ICT platform is Windows 7 using Microsoft Office 2010 software packages. These systems are supported by a dedicated ICT Department.

## **6.0 QUALITY ASSESSMENT**

It is recognised that as well as ensuring that premises due for inspection are actually inspected, the quality of the inspection is of equal importance. By ensuring and maintaining the quality of an inspection, it becomes a more focussed, effective tool in securing food safety.

To this end, the quality of the service is monitored in accordance with the 'Inspection Monitoring Management System' in compliance with FSA Code of Practice. This sets out the measures that will be taken to ensure quality and consistency of approach to inspections, information provided and correspondence.

In order to attain and maintain a quality inspectorate, minimum qualifications and experience are set for enforcement officers. This is monitored regularly. Staff also undergo shadow inspections and peer review inspections/case studies. Regular file audits and action training sessions are also carried out to maintain quality, competency and consistency within the Section.

Additionally, Notices to be served and other enforcement work are verified by the Senior Specialist EHO (Business Support) or Principal Environmental Health Officer to ensure consistency with the Enforcement Policy and compliance with the Code of Practice and correspondence and files are monitored on a routine basis.



**ACTION PLAN 2016/17**

<b>Task</b>	<b>Responsibility</b>	<b>Action</b>	<b>Success Criteria</b>	<b>Monitoring</b>	<b>Target</b>
Review the inspection process to improve hygiene standards in food businesses	PEHO SSEHO (FS)	<ul style="list-style-type: none"> <li>• Implement a project designed to improve hygiene standards within targeted food businesses using a variety of tools, including               <ul style="list-style-type: none"> <li>○ Business Mentoring</li> <li>○ Toolkit for businesses</li> <li>○ Coaching and training</li> <li>○ Web information</li> <li>○ Score improver training</li> </ul> </li> <li>• Increased face to face contact time with businesses</li> </ul>	Increased number of food businesses that are Broadly Compliant	Quarterly review against project plan. Report on the percentage of businesses that are 'broadly compliant'	March 2017
Report to the Food Standards Agency via the statutory return the percentage of businesses that are broadly compliant	PEHO SSEHO (FS)	<ul style="list-style-type: none"> <li>• Using the FSA's LAEMS report, identify the percentage of businesses that are/are not broadly compliant.</li> <li>• Target appropriate food safety interventions to increase the percentage of businesses that are 'broadly compliant'.</li> </ul>	Increasing percentage of businesses that are 'broadly compliant'.	Report on the percentage of businesses that are 'broadly compliant'.	Ongoing
Review processes relating to the work of the Business Support Team, including written policies and procedures, working arrangements and documentation to develop common streamlined	PEHO SSEHO (FS) EHM	<ul style="list-style-type: none"> <li>• Using lean thinking principles, review processes to identify where improvements to service delivery can be made from a business perspective. Identify and agree common procedures and processes to</li> </ul>	Common policies, processes and procedures developed and implemented across both local authorities. More efficient, effective and	Quarterly review against project plan.	March 2017

service delivery across both authorities.		be adopted and implemented across both authorities.	streamlined service delivery.		
Consider best way to implement new technology, and consider 'lean thinking' approach to reduce the time spent on inspections	PEHO SSEHO (FS) EHM	<ul style="list-style-type: none"> <li>Identify how technology can aid inspectors in delivering a lean inspection process.</li> <li>Participate in Corporate mobile working project.</li> </ul>	IT requirements identified. Assessment of value streams	Quarterly review against project plan.	March 2017
Develop links with businesses through local trade associations, Chambers of Commerce and Bucks Local Enterprise Partnership (LEP) to improve support for businesses and provide advisory service	PEHO SSEHO (FS) EHM	<ul style="list-style-type: none"> <li>Identify relevant Chambers of Commerce, Trade Associations and contacts within the LEP.</li> <li>Identify ways in which the service can work better with these organisations to better support local businesses.</li> <li>Develop service delivery in light of discussions with these organisations</li> </ul>	Better communication between local business representatives and the authorities. Changes in service delivery to better reflect business needs	Quarterly review against project plan.	March 2017
Develop Primary Authority arrangements with local businesses for both food and health and safety	PEHO SSEHO (FS) SEHO	<ul style="list-style-type: none"> <li>Actively pursue Primary Authority Partnerships</li> <li>In discussion with the particular business, develop the Primary Authority Principle in line with BRDO guidance.</li> </ul>	Successful development and smooth implementation of the Primary Authority Principle.	Monitoring of food and health and safety complaints/enquiries and liaison with other local authorities	March 2017
To develop and enhance the authorities' websites in relation to food and health and safety	SEHO/IT	<ul style="list-style-type: none"> <li>Identify ways in which the websites can be better used to provide information and guidance for businesses and to improve service delivery.</li> </ul>	Websites enhanced - improved and readily accessible guidance and information available for	Quarterly review against project plan. Quarterly review of website information to ensure that	March 2017

		<ul style="list-style-type: none"> <li>Identify ways in which the websites can supplement the mobile/remote working project to provide more efficient and effective work practices.</li> <li>To review the content of the Councils' websites in relation to food and health and safety and amend, remove or add new information as necessary in light of changes in legislation, government guidance and Council changes.</li> </ul>	<p>businesses. Officers able to use website to improve their interaction with businesses and to enhance remote working. The relevant sections of the websites are up to date, relevant and readily accessible.</p>	information is still current	
<p>Identify additional income streams for the department. Develop and deliver a chargeable advice service</p>	<p>PEHO SSEHO (FS) SEHO EHM</p>	<ul style="list-style-type: none"> <li>Identify sources of additional income that can be exploited.</li> <li>Develop projects that can be marketed to businesses and other local authorities as an additional service.</li> <li>Produce a marketing plan and identify ways in which new services can be publicised and promoted.</li> </ul>	<p>Increase in income generated. Projects identified and new services developed. Uptake of new services by businesses and local authorities. Business support valued by the community, active participation on training courses. Increased uptake of food and health and safety courses.</p>	Quarterly review against project plan.	March 2018
Participate in National	All	<ul style="list-style-type: none"> <li>Carry out promotional work</li> </ul>	Successful local	Project implemented	June 2016,

Food Safety Week June 2016 and other promotional events		<p>in collaboration with the Waste Management Team in relation to food safety theme of reducing food waste</p> <ul style="list-style-type: none"> <li>Continue to participate and promote the Bucks Trading Standards' Eat Well' scheme</li> </ul>	publicity to highlight food waste issues at home and raised awareness of food waste issues generally.	throughout the week in June.	ongoing
Carry out customer service survey to identify areas for service improvement	All	<ul style="list-style-type: none"> <li>Send out questionnaires after each inspection by email to assess business's degree of satisfaction and identify areas where the service can be improved</li> </ul>	Questionnaire sent out to businesses after each inspection. Returns show a high degree of business satisfaction.	Report on questionnaires posted and percentage of 'satisfied' returns received.	Ongoing
Ensure a programme of priority campaigns are carried out	All	<p>In line with the HSE Strategy and guidance, identify and deliver appropriate intervention projects</p> <p>Work to include articles in Grub's Up, development of website information, business seminars and targeted visits in collaboration with the HSE representative, as appropriate.</p>	Identified projects delivered according to the project plan. Businesses increasingly aware of the priority topic areas and implementing recommendations.	Review meeting at end of project period. Briefing note provided on successes and lessons learned for future projects.	Ongoing