



Appendix 1

LONDON BOROUGH OF TOWER HAMLETS

FOOD LAW ENFORCEMENT SERVICE PLAN

2009/2010

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Executive Summary

This is the Council's mandatory annual plan for the effective enforcement of food safety legislation. This plan fulfils the Council's obligations under the Framework Agreement on Local Authority Food Law Enforcement with the Food Standards Agency (FSA). The objective of this plan is to ensure that a programme of food enforcement activity is carried out, providing public confidence that food is produced without risk and sold under hygienic and safe conditions in Tower Hamlets. This plan is a public document and will be publicised on the Council's website.

The plan sets out the aims and objectives of the Environmental Health Commercial Team and links team priorities to the Council's core themes. The plan also gives an up to date profile of the Borough, a review of our activities in 2008/09 and our programme of work for 2009/10.

The Commercial Team carried out 96.5% of all Food Hygiene inspections due and 63.8% of all food standards inspections due. Food Standards inspections are seen as a second priority to that of food hygiene.

Enforcement activity was far greater this year with 13 food premises closed for pest infestations and a total of £53,290 fines and costs being issued by the Courts. However, the rate of broadly compliant premises was raised from 57% to 74.4%, this enabled us to concentrate our resources on the worst offenders in the Borough.

There has been a significant increase in illegal imported food into the Borough and we are working with neighbouring Boroughs to identify supply chains and take remedial action. The food product of choice for illegal importation is fish. We work with neighbouring authorities to close down supply chains.

Monitoring of our food safety service is carried out by the FSA, a new electronic return process is being developed it is expected that our performance last year has placed us in the top quartile of Local Authorities for performance.

The broadly compliant requirement is also a new National Performance Indicator – 184- which measures food establishments in the Borough which are broadly compliant with food hygiene law. We currently have 74.4% of food premises broadly compliant with an aspiration to increase this by 3% during this performance year. The greater gains were made in 2008/09 so the remaining premises are more difficult to deal with and we are creating broader strategies to deal with these premises.

The Service also feeds into the National Performance Indicator 182 – Satisfaction of businesses with local authority regulation services, new mechanisms were introduced to capture this data.

We have received funding from the Healthy Cities initiative and the Primary Care Trust Obesity Strategy to develop a Food for Health Award, which aims to create a culture of healthy food choices for residents/workers in the Borough. A separate Team has been developed to deliver this initiative within the Environmental Health Commercial Team.

A national Score on the Doors scheme is likely to be announced by the FSA at the end of the year. This scheme will allow Local Authorities to publish a food premises risk rating in line with national criteria. We will report back with recommendations when the national scheme is announced.

A review by central government (Rogers Review) into priorities for environmental health and trading standards within local government placed food safety/standards and health and safety within the top 5 priorities within the scope of environmental health.

Following on from the Hampton review into local regulation we have reviewed our services to determine if the inspection burden can be lifted on local businesses but ensuring that risks are controlled to ensure public health is not at risk. We have done this where the risk rating indicates that the business is broadly compliant

1 SERVICE AIMS AND OBJECTIVES

1.1 Aims and objectives

1.1.1 To promote and regulate food safety, food standards, health and safety in food premises.

1.1.2 To provide advice and education to all sectors of the community on food safety matters. Promotion of Healthy Eating in conjunction with the Primary Care Trust

1.1.3 To prevent the spread of infectious disease and food poisoning and investigate outbreaks.

1.1.4 Smoke Free enforcement and tobacco control. Workplace business awards from smoke free compliance and healthy eating.

1.1.5 Licensing of Massage and Special Treatment premises.

1.1.6 Health and Safety enforcement and advice, accident investigation in non food premises.

1.1.7 Animal welfare and the control of zoonotic diseases.

1.2 Links to Corporate objectives and plans

1.2.1 The Food Law Enforcement Service Plan is designed to meet customer needs and our services are provided with reference to the:

- Community Plan
- Council's Strategic Plan
- Directorate's Annual Plan
- Divisional Service Plan

1.2.2 The activities of the Environmental Health Commercial Team are linked where possible to these strategies, policies and objectives. These are set out in the Team Plan which details amongst other issues, the Food Enforcement objectives for the year and defines the performance that has been set to meet these targets.

1.2.3 The Vision Statement of the Council is:

To improve the quality of life for everyone living and working in Tower Hamlets.

1.2.4 The Council will realise its overall Vision for the Borough through five core themes:

- **One Tower Hamlets**
- **A great place to live**
- **A Prosperous Community**
- **A Safe and Supportive Community**
- **A Healthy Community**

1.2.5 The aim of the Environmental Health Commercial Team is to protect residents, visitors and businesses by:

- *The enforcement of consumer legislation by way of inspection, complaint investigation, training and advice.*
- *Advising consumers on the resolution of civil disputes with traders.*
- *Promoting and regulating food hygiene/safety and standards of health and safety in the workplace and at public events in the borough*
- *Preventing the spread of infectious disease and food poisoning, including the investigation of outbreaks*
- *Issue and enforcement of approvals (manufacturing premises) covering a range of activities*
- *Developing partnerships with businesses, regeneration initiatives and other organisations in the Borough*
- *Involving ourselves in national strategies i.e. Obesity Strategy, fast food outlets around schools.*
- *Smoke Free enforcement and advice*
- *Promotion of business awards for smoke free and healthy eating in conjunction with the primary Care Trust*
- *Animal welfare and the control of zoonotic infections*
- *Licensing of Massage and Special Treatment premises.*

2.0 **BACKGROUND**

2.1 **Profile of Tower Hamlets**

2.1.2 Tower Hamlets has a wide range of commercial food businesses located across different parts of the borough. Some of the key businesses include:

- Major supermarkets (Tesco, Asda, Sainsbury, Lidl, Marks and Spencer & Waitrose)
- Office developments occupied by blue chip companies, newspaper publishers, with large scale catering

- Several major hotels, including Britannia, Four Seasons, Thistle Tower, Holiday Inn, Hilton, Radisson and Marriott
- There is a diverse range of restaurants and cafes in the borough, including Italian, French, Greek, Turkish, Somali, Spanish, Chinese, Japanese, Thai and those from the Indian sub-continent (India, Bangladesh, and Pakistan).
- 94 schools
- Billingsgate – London’s major Wholesale Fish Market
- World famous street markets at Petticoat Lane, Whitechapel, Brick Lane and Roman Road.
- London Guildhall University, Queen Mary University of London and The Royal London Hospital Medical Schools
- The Royal London, St Andrews, Mile End, London Chest and London Independent Hospitals
- 2 poultry slaughterhouse
- 3 City Farms
- numerous night clubs & other venues
- Many community events such as concerts in Victoria Park and festivals in Brick Lane.

2.2 Organisational Structure

2.2.1 The Team is located within the Trading Standards and Environmental Health (Commercial) Division. This division is part of the Environmental Control Group, which includes Environmental Health Protection, Markets Services and Parking Control. Environmental Control is part of the Directorate of Communities Localities and Culture. The structure of Environmental Health (Commercial) is in Annexe B. The Council’s administrative committee structure is set out in Annexe C and structure showing where the service sits in the overall council organisation is in Annexe D.

2.2.2 Food Safety falls within the portfolio of the Lead Member for Cleaner, Safer, Greener, who reports food safety matters to Cabinet.

2.3 Scope of the Food Service

2.3.1 The Environmental Health Commercial Service is responsible for the following functions in all commercial premises.

- food hygiene
- food standards
- health and safety
- infectious disease control
- public health activities
- Special Treatment licensing
- animal Health
- Smoke Free/Tobacco Control

- 2.3.2 Nuisance and Pollution control issues related to commercial premises are dealt with by the Environmental Protection service. The Trading Standards Team deals with animal feeding-stuffs and fraudulent activities covered by the Food Safety Act.
- 2.3.3 A proactive and reactive service in relation to food hygiene and food standards is provided primarily through the programmed inspection of food businesses and by responding to service requests including comments on planning and licensing applications. An electronic response system has been created to reduce the time in responding.
- 2.3.4 Agency staff has been employed to deal with some programmed food safety inspections and Service Requests to cover staff vacancies within the team. Agency staff has been used to backfill vacant posts whilst recruitment takes place. We are also using agency staff to backfill the programmes that we are working on with the Primary Care Trust to enable up skilling of our own staff.
- 2.3.5 The Services functional areas are set down in the Environmental Health Commercial -Team Plan (Annexe E)
- 2.4 Demands on the Food Service
- 2.4.1 Premises Profile
- 2.4.2 The tables below show the number of food businesses in each risk category classified by type of activity and risk rating. Some premises, where the risk is negligible are discounted from the inspection programme. The trend of the number of food safety premises dropping from high risk (A rated premises) to medium risk has continued again this year with a 32% reduction in A rated premises. There are 29% less high risk premises this year for food standards. The reduction in the high risk premises has been due to targeted advice, education and enforcement by the Team.

Table 1

The number of food businesses and their inspection rating for food hygiene (1/5/09)

Usage	A Band	B Band	C Band	D Band	E Band	Outside	Unrated	Total
Producers			2					2
Slaughterhouse						2		2
Manufacturers	3	5	17	3	1	2	3	34
Packers			1					1
Importers EC						3		3
Importers 3rd					1	7	1	9
Transporters		3	58	19	5		4	89
Retailers		3	25	16	73	5	2	124
Restaurants	3	124	734	53	34	2	40	990
Contact Wrappings						4		4
Mfr selling by retail		2	21	4	2		2	31
Supermarket			15	3	2		3	23
Small Retailer	1	6	270	156	94		25	552
Retailer							1	1
Pub/Club	1	4	116	80	41		6	248
Takeaway	5	31	153	11	4		33	237
Caring premises		1					109	110
Mobile			1		1		2	4
Others		1	3				1	5
Total	13	180	1416	345	258	25	232	2469

Total 2469 premises

The frequency of inspection is:

Category A, every 6 months; B, every 12 months; C, every 18 months, D, every 2 Yrs; and E, every 3 Yrs. The Category of Unrated premises is determined on the first visit and can be A-E. Category E premises may be dealt with using an alternative enforcement strategy.

Table 2

The number of food businesses and their inspection rating for food standards (1/5/09)

Usage	A Band	B Band	C Band	Outside	Unrated	Total
Producers		2				2
Slaughterhouse		1	1			2
Manufacturers	5	19	4		6	34
Packers		1				1
Importers EC	1			2		3
Importers 3rd		3	2	1	3	9
Transporters	3	70	9	1	7	90
Retailers	1	21	71	21	10	124
Restaurants		381	519	7	83	990
Contact Wrappings			2	2		4
Mfr selling by retail		6	10		5	31
Supermarket		7	12		4	23
Small Retailer	4	189	291	2	66	552
Retailer					1	1
Pub/Club		62	170		16	248
Takeaway	1	124	71		41	237
Caring premises		1			109	110
Mobile			1		3	4
Others		3	1		1	5
Total	15	900	1164	36	354	2470

Total premises 2470

The frequency of inspection is:

A, every 12 months; B, every 2 years; C, every 5 years. Category C premises may be dealt with using an alternative enforcement strategy.

2.4.3 As at April 2009 the following establishments were approved by the Council to produce and manufacturer food for the domestic market: -

- 5 fishery manufacturer products establishments
- 46 wholesale fishery products and live shellfish market
- 9 meat products establishments
- 1 sandwich manufacturer

2.4.4 Tower Hamlets' food businesses are primarily caterers and retailers.

2.4.5 There has been a rise in the proportion of imported foods (from non EC Countries) entering the borough, either directly imported by businesses or by third parties located elsewhere. Some of these foods can be illegal (i.e. banned from importation) or do not comply with compositional or labelling requirements. This area of work is continually increasing due to cheap imports and consumer demand. However, this food gives rise to a risk to human health. Voluntary surrender and seizure of this food has been on the increase. A third of a tonne was seized in a period of two weeks enforcement on illegally imported food.

2.4.6 With continual development and regeneration taking place in the borough, there is an increase in the number of food businesses. We are already working in partnership with our neighbouring Boroughs in assessing the likely impact of the 2012 Olympics and joint Food Policies are being developed for the Olympic period.

2.4.7 When carrying out a food hygiene or food standards inspection, officers may also carry out a health & safety inspection where the council is the enforcing authority for the relevant legislation. For 2009/10 these inspections will be on a project basis. The projects will look at asbestos, machine guarding, gas safety, falls through cellar hatches.

2.4.8 One third of the population is of Bangladeshi origin and over half the population are from ethnic minorities. The make up of food businesses reflects this profile, although demand for translation and materials in other languages is not high. Ethnic minority food business proprietors generally prefer written information to be provided in English. A translation and interpreting service is available if required and a number of our staff are multi lingual.

2.4.9 Reception and Information Service

2.4.10 The reception and information point for the Trading Standards and Environmental Health (Commercial) Department is located at:

Anchorage House
Clove Crescent
London E14

2.4.11 We operate an out-of-hours emergency call-out service, which operates from 5pm to 8am on a weekday and 24hrs at weekends and Bank Holidays. This service operates only for food poisoning outbreaks or major food safety incidents and other non-food safety related emergencies.

2.4.12 Tower Hamlets also has a website at www.towerhamlets.gov.uk and the Environmental Health Commercial Team have an E-mail address, namely: foodsafety@towerhamlets.gov.uk and healthandsafety@towerhamlets.gov.uk This address is also used for the national electronic communication system for Environmental Health Departments, known as EHCNet.

2.5 Enforcement Policy

2.5.1 The current enforcement policy is documented and outlines all enforcement action carried out by officers. It seeks to ensure that formal enforcement is focused where there is a real risk to public health and that officers carry out action in a fair, practical and consistent manner. This policy has been reviewed in light of the Regulators Compliance Code, which replaced the Enforcement Concordat for our Service.

3.0 **Service Delivery**

3.1 Inspection Programmes

3.1.1 The new performance indicator 184 – Food establishments in the area that are broadly compliant with food hygiene law – has significantly changed the way that we plan the food hygiene inspections. This indicator covers all the food premises in the Borough, not just those that are due for inspection this year. A risk score of 10 points or below in the compliance of premises structure and hygiene laws and the confidence in management determine if the premise is broadly compliant.

3.1.2 The FSA code of practice that compliments the NI 184 permits shorter inspections to be undertaken on those businesses that are deemed broadly compliant in the lower risk categories of C and D for food hygiene and questionnaires for those in category E

- 3.1.3 We use a hazard spotting approach for those premises that are deemed to be broadly compliant. This reduces the burden on business and concentrates our resources on the non compliant businesses. However, a full inspection will be carried out if these compliant businesses are not in control of the risks or a public health risk is identified.
- 3.1.4 It is envisaged that a significant number of businesses will continually move between broadly compliant and not broadly compliant. We also envisage a significant number of re-inspections will be undertaken to ensure that we keep the upward trend towards broadly compliant.
- 3.1.5 We have determined that we have 74.4% of all food premises currently broadly compliant.
- 3.1.6 The Food Safety Officers carry out programmed food hygiene/standards inspections at frequencies determined by the Food Standards Agency. A programmed food safety inspection will therefore cover food hygiene and food standards, where this falls due (although some premises will fall due for food standards inspection only) and we will also deal with issues relating to enforcement and advice under health and safety law, either in very broad terms or as part of a focused health & safety project. The inspection programme is dictated by the food hygiene inspection rating allocated to a business because this generally leads to more frequent inspections. However, Category A risk food standards inspection due dates are checked to ensure that these are inspected. Some premises such as importers who do not actually handle or store food are subject only to food standards inspections.
- 3.1.7 Category E food hygiene and Category C food standards inspections will be addressed by using alternative enforcement strategies, such as a self audit questionnaire. These questionnaires will be sent to all Category E and C rated premises. Verification follow up will be carried out on 5% of these premises.
- 3.1.8 For 2009/10 the number of food hygiene inspections due is shown in Table 3 and the number of food standards inspections due is shown in Table 4:

Table 3

The number of food hygiene inspections due to be carried out in 2009/10.

Inspection Rating	Number of food hygiene inspections due
A	12 x 2 = 24
B	186
C Broadly compliant	737
C not Broadly compliant	178
D Broadly compliant	115
D not broadly compliant	26
E (verification)	6
Unrated	231
Total Inspections	645
Total Surveillance visits	852
Total Interventions	1497

Table 4

The number of food standards inspections due in 2009/10 and the inspection targets.

Inspection Rating	Number of food standards inspections due
A	15
B	522
C (verification)	16
Unrated	354
Total	907

3.1.9

Most food standards inspections will be carried out at the same time as a food hygiene inspection. It is the teams' target to achieve 100% of all A-C hygiene inspections and A standards inspections due. We aim to achieve 80% of the surveillance inspections.

As directed by the new National Performance Indicator 184– we aim to concentrate our resources to increase our current broadly compliant rate by 3% to 77.5%.

- 3.1.10 Where possible new premises identified will be added to the work programme to be inspected during the year. These ‘unrated’ businesses will count against the NI 184, hence resources will be allocated to carry out inspections on the unrated businesses. The current increase in unrated has been the addition of Childminders onto the system that are likely to be low risk.
- 3.1.11 Food hygiene and food standards inspection procedures detail the steps to be followed by officers. They take account of relevant Codes of Practice, LACORS and FSA guidance and relevant Industry Guides.
- 3.1.12 Hygiene revisits will be carried out where enforcement notices have been issued, there is a significant public health risk or the premises in not broadly compliant.
- 3.1.13 Food Standards revisits are of a lower priority and not required as often as for food hygiene.
- 3.1.14 The resource estimated for programmed inspections, including alternative enforcement strategies for lower risk premises is **3.5 Full Time Equivalent (FTE)**. Re inspections allocation to be **1.4 FTE**. **Annexe A** gives details of the assessment of resources for all functions within the plan.
- 3.1.15 Additional priorities have been identified for action including: -
- Inspections will be carried out at major festivals.
 - Routine attendance at Billingsgate Market.
 - All premises subject to approval will require additional attention and inspection time due to the risk they present.
 - Food Standards will be combined with Food Hygiene inspections.
 - Illegal importation of food will be targeted as priority
 - Health & Safety inspections will be on a themed basis.
 - Cross contamination in butchers shops, in response to the Pennington Report
 - Closure and follow-up enforcement action, including prosecution of businesses as appropriate.
 - We will specifically target A risk premises and Higher B’s with advice and enforcement
 - We will use alternative enforcement strategies in low risk premises.

3.2 Food Complaints/Requests for Service

3.2.1 The Environmental Health Commercial Team will record, assess, prioritise and deal appropriately with all requests for service. Requests for service will be classed as higher risk issues or lower risk issues. The target response time for service requests are:

- *To give a 1st response to 99% of service requests within 5 working days*
- *To respond to 100% of higher risk issue service requests within 24 hours.*
- *To register all new premises within 28 days of receipt of application form.*

3.2.2 The number of service requests for 2008/9 was 1024, a 4% upward trend on the last year.

3.2.3 The resource estimated for dealing with service requests is **2.2 FTE**.

3.3 Home Authority Principle

3.3.1 The Council formally adopted the Local Authority Co-ordinating Body on Regulatory Services (LACORS) Home Authority Principle at the Planning and Environmental Services Committee meeting of 13th June 1995. A Home Authority is the local authority where the decision making base of an enterprise is situated. The local authority provides advice to the enterprise and deals with enquiries from other councils in relation to the business. An Originating Authority premises is one where the food is manufactured, stored or first imported to, but to which the definition of Home Authority does not apply. The new concept of Priority Authority Partnerships that has recently been introduced by the Government may affect work plans for companies where the company trades across two or more Local Authority areas. This will enable one Authority to be a Primary Authority that will guide the business on compliance issues. The affect of Primary Authority Partnerships is yet to be realised.

3.3.2 Approximately 200 businesses have been identified as probable Home or Originating Authority premises. Enquiries for advice from local businesses or other enforcement authorities will be treated as requests for service and will be prioritised accordingly.

3.3.3 The resource estimated for this area of work is **0.25 FTE**.

3.4 Advice to business

3.4.1 Advice is freely available to food businesses and is provided during visits and upon request. Business information packs have been produced for people considering setting up a food business and are sent to relevant applicants for planning permission. A variety of information leaflets, in community languages, are also available.

3.4.2 A business newsletter (Food and Drink) was established in 2003/4, published 3 times a year. This has been well received and will continue in 2009/10.

3.4.3 The resource required for this work is estimated to be **0.5 FTE**.

3.5 Food Inspection and Sampling

3.5.1 Food is inspected in accordance with UK and EU legislation. A documented sampling programme is produced each financial year covering planned microbiological and chemical sampling. Our sampling policy is at Annex F

3.5.2 The programme includes participation in co-ordinated projects organised by the Food Standards Agency, Health Protection Agency (HPA), Local Authority Coordinating Body on Regulatory Services (LACORS), EU, London Food Co-ordinating Group and North East London Food Liaison Group. Planned local projects and Home Authority sampling are also included.

3.5.3 The target for 2009/10 is approximately 145 samples to be taken by the end of the financial year. The budget for sampling is £12,000.

3.5.4 The total number of samples taken for 2008/09 was 247 of which 35 failed and follow up action was required.

3.5.5 The Laboratories to which samples are sent are subject to the appropriate accreditation. Analysis is undertaken by the Council's nominated Public Analysts:-

Duncan Arthur
Jeremy Wooten
Eurofins Scientific Laboratories, 445 New Cross Road, London, SE14

Microbiological examination is undertaken by:-

Susan Surman (Food Examiner)
Health Protection Agency, Food, Water & Environmental Microbiology Unit (London), Food Safety Microbiology Laboratory,
Central Public Health Laboratory, 61, Colindale Avenue, London, NW9 5HT.

On occasions, samples for microbiological examination will be sent to Eurofins Scientific Laboratories.

3.5.6 The resource required for food sampling is estimated to be **0.7FTE**

3.6 Outbreak Control and Infectious Disease Control

3.6.1 We will investigate all suspected and confirmed outbreaks of food poisoning and the Outbreak Control Plan will be implemented in the case of a major outbreak (i.e. 4 or more cases).

3.6.2 Individual allegations of food poisoning caused from consumption of food within the borough, but which are not supported by medical evidence will be treated as service requests. The level of resource is estimated at **0.3 FTE**

3.7 Food Safety Incidents

3.7.1 We deal with Food Alerts in accordance with the Code of Practice and guidance issued by the Food Standards Agency. Alerts requiring action by the department will take priority over all other work. The out-of-hours emergency service will notify the duty officer in the event that the Food Standards Agency notifies them of a major incident of food contamination which occurs outside normal office hours.

3.7.2 There is a policy document and procedure note on dealing with Food Hazard Warnings.

3.7.3 Resources for this work are dependent on the demand. In 2008/9 there were 77 Food Hazard Warnings and 55 Allergy Alerts issued by the FSA. Resources are therefore estimated at **0.3 FTE**. (Included in Service Requests above)

3.8 Liaison with Other Organisations

3.8.1 Liaison arrangements are in place to ensure that enforcement action in Tower Hamlets is consistent with neighbouring authorities and in particular: -

- Tower Hamlets is a member of the North East London Food Liaison Group which meets every eight weeks.
- A PEHO attends regular sub-group meetings to discuss and arrange co-ordinated sampling activities.
- Tower Hamlets is a key member of a further sub-group on approved premises.
- A member of the team is the Joint Secretary of the CIEH London Food Study Group and staff regularly attends their meetings.
- Planned liaison meetings take place between the Health Protection Agency.
- We are an active member of the Olympic Boroughs network for Environmental Health

3.8.2 The resource required for these activities is estimated at **0.2 FTE**.

3.9 Food Safety Promotion

- 3.9.1 The Food Safety Officers will, subject to available resources, carry out food safety promotional work through participation in certain national campaigns and local projects, more specifically:
- A local campaign, including a press release is planned to highlight relevant food safety issues prior to Christmas.
 - It is intended to examine opportunities to participate in appropriate schemes, deliver talks, and provide displays for suitable groups or at events or locations throughout the year.
 - National Obesity Strategy working with the PCT.
 - Seeking small grants from the Food Standards Agency to carry out bespoke projects
- 3.9.2 The resource required for these activities is estimated at **0.6 FTE**.
- 3.10 Administration
- 3.10.1 The Service's central Admin team provides administration support.
- 3.11 Management
- 3.11.1 The Environmental Health Commercial Services Manager provides management, with support from the 3 PEHO's who also have fieldwork duties. Management accounts for approximately **1.25 FTE**.
- 4.0** Resources
- 4.1 Financial Allocation
- 4.1.1 The Food Safety financial allocation is part of the Environmental Health (Commercial) cost centre. The budget allocation is as shown in **Table 5**.
- 4.1.2 Training costs are included in the Employee related expenses. We are currently supporting a Trainee Environmental Health Officer to enable us to deal with recruitment difficulties by 'growing our own' staff.
- 4.1.3 Provision of other central, directorate support services which includes legal services is added at the end of the financial year to service costs. This recharge is on a divisional basis and not broken down into individual teams.

Table 5 Budget for Environmental Health Commercial – Food Safety 2009/10

EXPENDITURE	
Salaries	616,600
Employee Related Expenditure	12,300
Car Allowances	13,223
Parking Permits/Charges	615
Public Transport Costs	205
Equipment & Furniture	2,800
Materials , Samples & Testing	22,400
Clothing, Uniforms & Laundry	205
Office Expenses	1,640
External Services	5,843
Communication Costs	1,025
Miscellaneous Expenses	600
GROSS EXPENDITURE	677,456
INCOME	
Fees and Charges	(2,563)
Other Fees and Charges	(1,128)
GROSS INCOME	(3,691)
NET EXPENDITURE	673,765

4.2

Staffing Allocation

4.2.1 The staffing for food safety work, is as follows:

0.5 x Environmental Health Commercial Service Manager
3 x Principal Environmental Health Officer (PEHO)
3 x Senior Environmental Health Officer (SEHO)
4 x Environmental Health Officer (EHO)
2 x Food Safety Officer (FSO)

(Total Technical Staff for work identified in plan = **12.5 FTE**)

4.2.3 Additional resources located outside of the Environmental Health Commercial Team are as follows:

TSO/CSO –Animal Feeding-stuffs – resources allocated as required

Environmental Health Commercial & Trading Standards Teams share administration Resources:

Food Safety allocation is approximately:

1 x Administration Team Leader (0.3 FTE)
1 x Senior Administration Officer (0.3 FTE)
4 x Administration Officers (1.2 FTE)
(Total Admin staff = **1.8 FTE**)

4.2.4 Authorisation and competencies

EH Com Service Manager/PEHOs/EHOs:

- Fully qualified to Diploma/Degree level
- Authorised to inspect all categories (with the exception of any officers who have not been qualified for 6 months or have insufficient experience)
- Take all levels of enforcement action (with the exception of any officers who have not been qualified for 2 yrs)

4.3 Staff Development Plan

4.3.1 The council uses its Performance Development and Review Scheme to:

- Set individual aims and objectives for staff.
- Monitor and appraise performance.
- Assess the development needs of all staff.

At the start of the performance year all staff will have their own Personal Plan, which will comprise of their main objectives with targets and their own development plan.

4.3.2 Individual and Team training plans reflect the following

- Common training issues for the service
- Training issues linked to Corporate and Directorate priorities
- Training linked to new legislation, professional developments
- Training relating to organisational matters (IT, systems and procedures)

4.3.3 Training for the financial year 2009/10 is prioritised as follows:-

Food Issues

Imported Food

Hazard Analysis Critical Control Point Auditing

Update Seminars

General Issues

Team Building

Equalities

Communication Techniques

4.4 Allocation of Resources

4.4.1 **Table 6 in Annexe A** sets out the total resources available (i.e. **12.5 FTE** officers) and how the resources identified to complete the plan in 2008/9 were allocated. The table also sets out the resources required to fulfil the plan for 2009/10 (**13 FTE**).

4.4.2 It will be possible to deliver on this plan, providing that the current vacant posts continue to be filled by agency staff .

4.4.3 Section **6.0** of this Plan sets out the achievements of the team in 2008/9

4.4.4 The areas of work which were not completed were:

- Home Authority activity – no formal agreements were established.
- Programmed inspections were 96.5% of those planned for hygiene and 63.9% for standards.
-

5.0 Quality Assessment

5.1 The measures to be taken by the Environmental Health Commercial management to assess quality and promote consistency include: -

- Desktop reviews of proactive and reactive case paperwork and files will be undertaken by a PEHO.
- New or Agency staff will be inducted into the departments procedures and shadowed on inspections to ensure competency and consistency.
- All staff will have a 6 weekly 1 to 1 with their immediate supervisor to discuss casework.
- Accompanied inspections will be carried out with each member of staff.
- Documented procedures
- Bi -monthly documented team meeting
- Occasional training sessions and other exercises which are organised to aid consistency, staff appraisals and 6 month reviews.
- Monthly monitoring reports will be produced using the FLARE software system.

6.0 Review

6.1 Review against the Service Plan

6.1.1 The Environmental Health Commercial Service Manager will present reports to the Service Management Team on performance of the food safety inspections against performance targets detailed in the Service Plan.

6.1.2 At the end of the financial year, a performance review is carried out by the Environmental Health Commercial Service Manager with input from team members, which will include information on the past year's performance and progress on any specified performance targets, service improvements and targeted outcomes. It will also identify service priorities for the coming year. The review of 2008/9 is set out in 6.4 below.

6.2 Identification of any variance from the Service Plan.

6.2.1 Any variance in meeting the Food Law Enforcement Service Plan is identified in the review in 6.4 together with any reasons for the variance. Where necessary any variance will be addressed in this years plan.

6.3 Areas of Improvement

6.3.1 Where a service improvement or a service development is identified as part of the review process or through quality assessments, it will be incorporated into this years plan. Key areas for improvement identified from the review are detailed in paragraph 6.17.

6.4 Inspection Programmes

6.4.1 96.5% of all food hygiene premises that were due for inspection had a food hygiene intervention. For the higher risk premises this was 98%. All overdue premises have been carried forward to the 2009/10 programme.

6.4.2 We carried out 469 revisits, this is an decrease from the previous year, as the new National Performance Indicator led us to maintain broadly compliance, once this is achieved no further intervention was carried out. This equates to 1 in 3 premises receiving a re-inspection.

6.4.3 63.9% of the food standards programme was carried out, this is an increase on last year due to better information for staff to undertake food standards inspections along side food hygiene inspections.

6.5 Enforcement

6.5.1 12 businesses or individuals were prosecuted as a result of either programmed inspections or complaint inspections. This resulted in total fines of £36,900 and costs awarded of £16,390. 15 Simple Cautions were issued which negated the need for Court proceedings but the business recognised its failings.

6.5.2 111 formal improvement notices were issued and 2184 warning letters or hand written warnings were given to businesses throughout the year.

6.5.3 7 premises were closed by Emergency Prohibition Notices and 6 voluntary closed, mainly for uncontrolled pest infestation.

6.6 Additional Priorities

6.6.1 Regular early morning inspections were carried out at Billingsgate Market. Programmed inspections were carried out as well as general supervision of the market. The Corporation of London were also issued with their approval to run the Market. We

continue to work with the 40 plus traders so that they can achieve their approval status. 58 approvals have now been issued to permit businesses to manufacture or distribute food on a wholesale basis.

6.7 Food Complaints/Requests for Service

6.7.1 A total of 1024 service requests were received. The level of service in response to Service Requests was in line with service priorities.

6.7.2 The service requests consisted of some of the following, 104 complaints alleged food poisoning due to eating out in Tower Hamlets (up by 27%). 24 complaints were about dirty premises (up by 30%), 84 about unhygienic practices (up by 8%), 88 about pest infestations (down by 7%) and 92 complaints were received about food standards issues, such as food labelling (Use by dates).

6.8 Home Authority Principle

6.8.1 No formal Home Authority Partnerships were established during the year. Minimal work was done on developing Home Authority relationships with businesses, due to the demands of other areas of work. However a number of the contacts from outside bodies were Home Authority enquiries from other authorities. Each of these was dealt with as appropriate and in line with the Home Authority Principle.

6.9 Advice to Business

6.9.1 Business packs for new businesses continued to be issued, along with a booklet giving advice on carrying out a hazard analysis.

6.9.2 The business newsletter "Food and Drink" was published 3 times during the year and sent to all businesses.

6.10 Food Inspection & Sampling

6.10.1 247 Food samples were taken in total of which there were 35 failures. These were subsequently followed up.

6.10.2 A full Sampling Plan has been produced for 2009/10 and it is proposed to ensure that every effort is made to fulfil it, as food sampling is seen as an important part of the work for food safety.

6.11 Outbreak Control & Infectious Disease Control

6.11.1 Some 104 service requests alleged food poisoning originating from food consumed in the borough but no firm links were established.

6.12 Food Alerts

6.12.1 132 Food Alerts were received from the Food Standards Agency, most of these did not require any action, however a number did result in the issue of Press Releases to notify the public and some required a large number of businesses to be notified in writing.

6.12.2 Food Alerts attract a high priority and immediate response. Significant resources were spent on responding to these Alerts, which could otherwise have been spent on other significant activities.

6.13 Liaison with Other Organisations

6.13.1 The food safety unit fulfilled all of its liaison activities in the 2008/9 plan.

6.14 Food Safety Promotion

6.14.1 Local campaigns took place within the Newsletter to highlight issues of concern to Food Business Operators e.g. cleaning, cross contamination and preparing sushi.

6.14.2 We conducted promotional activities on hand washing during Food Safety Week to schools.

6.15 Staffing

6.15.1 The team was not fully staffed during the year except for the following:

- Agency staff were used to cover some of the vacancies, however some day to day work fell to other members of the team.
- 3 new Officers were recruited.
- We have a number of enthusiastic newly qualified staff.
- Funding was received for the Healthy Eating Award and agency staff have been employed to assist with this work, they have now been appointed on fixed term contracts.

6.16 Training

6.16.1 The food safety officers undertook a wide range of training activities during the year, these included:

- Food Approvals
- FSA interventions programme
- Ethnic Foods
- Imported Foods
- HPA Food Update Training Day
- Flare User Group Annual Seminar
- Food Standards Regional Sampling Meeting
- London Food Study Group
- Food Law Changes
- Food Law reporting changes to the Food Standards Agency

6.16.2 Quality Assessment

6.16.3 Documented team meetings took place.

6.16.4 Monthly monitoring reports are now produced on a regular basis

6.17 Key areas for Improvement/Development

6.17.1 A few stall holders at Billingsgate require approval.

6.17.2 We are working with the private markets to control the hazards produced by stall holders.

6.17.3 Procedures are systematically reviewed and completed and kept up to date.

6.17.4 Quality monitoring is continuing.

6.17.5 Development of alternative enforcement strategies for low risk premises including childminders.

6.17.6 A review of butchers shops and the risk of cross contamination

6.17.7 To review the FSA guidance to Local Authorities on the Scores on the Doors scheme when it is released at the end of this year.

6.17.8 To review our data capture systems to reflect the national performance indicators and data required by the FSA

6.17.9 Review the new Code of Practice when released by the FSA

6.17.10 To recognise the Primary Authority Partnership scheme from the Better Regulation Executive

7.0 Annexes

Annexe A: Assessment of resources

Annexe B: Environmental Health (Commercial) Structure

Annexe C: Current Council Administrative Structure

Annexe D: Current Council Corporate Structure

Annexe E: Environmental Health Team Plan 2009/2010

Annexe F: Food Sampling Policy 2009/2010

Annex A

Assessment of Resources

Resources for 2009/2010

Table 6

Estimation of Full Time Equivalent (FTE)

1 year	365 days
Annual Leave	31 days
Training / team meetings	24 days
Bank Holidays/Statutory leave	12 days
Sick leave/dependency/Special leave etc	5 days
Weekends	104 days
Downtime – reading, research etc.	18 days
Officer Administration	10 days
Number of working days	161 days
1 FTE	161 days (1127 hours)

Programmed Inspections

High risk premises (Cat A,B and not broadly compliant premises) = 645 inspections due, at 3 ½ hours per inspection (this is in line with the average London authority – LFGG bench marking exercise carried out in September 1999), therefore 2258 hours to inspect 100%.

Broadly compliant premises = 852 inspections due at 1.5 hours per inspection, therefore 1278 hours to inspect 100%.

Total for inspections/surveillance therefore = 3536 hours (505 days)

Low risk (E hygiene and C standards) premises are likely to be subject to alternative enforcement strategies:

Allow 10 hrs for management of scheme. Allow 0.25 hrs per premises (401) for implementation of scheme = 110 hours

Allow 5% will require inspection, i.e. 25 premises at 1.5 hrs each = 37.5 hrs

Total for Alternative Enforcement Strategies = 147 hrs (21 days)

Food Standards Inspections A rated: 15 premises due for food standards only @ 2 ½ hrs each = 37.5 hrs (5.5 days)

Approval inspection an processes of HACCP 20 premises @ 14 hours = 280 hrs (40 days)

Resource required to achieve 100% inspection rate = **3.5 FTE**.

Re inspections following programmed inspections

All Category A premises will require a revisit as will premises that fall out of the broadly compliant range.

A = 12 @ 3.5hrs = 42 hrs (6 days)

Premises falling out of broadly compliant category 431@ 3.5 hours = 1510 hours (216 days)

Resource required for re inspections = 222 days = **1.4 FTE**

Food standards inspections revisits 50 @ 2hrs = 100 hrs (14days)

Resources required for food standard revisits = **0.1FTE**

Service requests

It is expected that some 1000 food safety related service requests will be received during the year. It is estimated that each will take an average of 1.5 hrs, therefore 1500 hrs will be required to deal with these.

Total for Service Requests 1500 hours (214 days)

In addition:

100 Planning Applications @ 1 hr each = 100 hrs

Total time for Planning Applications = 100 hrs (14 days)

80 Premises Licence Applications @ 1 hr each = 80 hrs

Total time for Premises Licence Applications = 80 hrs (11 days)

132 food alerts @ 1 hr each = 132 hrs

10% approx will require extensive investigations etc. 13 @ approx. 15 hrs each = 195 hrs

Total time for Food Alerts = 327 hrs (47 days)

Approximately 150 new premises to open during year @ ave of 3 ½ hrs each = 525 hrs

Total time for New Premises = 525 hrs (75 days)

Total for Service Requests = 361 days = **2.2 FTE**

Home Authority Premises

There are approximately 200 premises considered to be either Home or Originating Authority. Most of these will simply be dealt with during routine inspections. However it is estimated that approximately 15 premises will require greater attention.

15 premises @ 7 hrs each = 105 hrs

185 premises @ 1 hr each = 185 hrs

Total time for Home Authority = 290 hrs (41.4 days) = **0.25 FTE**

Advice to Businesses

As well as ongoing advice throughout the year on an ad-hoc basis, a Business Newsletter Produced. Business seminars will be run for the non broadly compliant premises

Newsletter – 3 @ 35 hrs = 245 hrs

Ad-hoc support & advice = 250 hrs

Business seminars = 35 hrs

Total for Business Advice & Support = 530 hrs (76 days) = **0.5 FTE**

Food Sampling

Sampling will be based on the Sampling Plan - which consists of a number of projects co-ordinated, by either: EU, LACORS/HPA or the NE Sector Liaison Group, plus a number of local projects and home authority sampling.

200 samples @ average of 3.5 hrs per sample = 600 hours

Follow up to adverse results 20% = 40 @ 4 hours per sample = 160 hours

Total for Sampling = 760 hrs (108.5 days) = **0.7 FTE**

Outbreak Control

The resource required to deal with an outbreak will depend on the size and complexity of the incident. Estimated **0.3 FTE**.

Liaison

Attendance at Sector Group meetings, study groups etc and follow-up work = 25 days

Planned liaison meetings with trading standards, legal services etc = 10 days

Total resource required is = **0.2 FTE**

Food Safety Promotion

A number of initiatives are planned, as follows:

- Food Safety Week @ 140 hrs (20 days)
- Miscellaneous press releases and events @ 35 hrs (5 days)

Total time for Health Promotion = 175 hrs (25 days) = **0.6 FTE**

Other Activities

Inspections will be carried out at major festivals and outside events such as the Brick Lane Festival and events in Victoria Park.

Total for festivals 200hrs (28 days)

Billingsgate Market:

Allow 4 hrs per week for Proactive visits, including dealing with service requests.

Allow 125 hours for progression of individual businesses to Approval

Total for Billingsgate Market = 333 hrs (47 days)

Imported Food Projects/Surveillance allow 300 hrs

Total for Imported Food Control = 300 hrs (43 days)

Approved Premises:

Allow 70 hrs for processing additional premises identified during year

Total for approved = 70 hrs (10 days)

Food Standards Projects:

Allow 140 hrs for Food Standards Projects

Total for Food Standards Projects = 140 hrs (20 days)

Approximately 12 closures @ up to 50 hrs each (inc of legal action) = 600 hrs

Total time for Closures = 600hrs (86 days)

Total for other activities = 234 days= **1.5 FTE**

Technical Support

The Food Safety Officers are responsible for supporting officers in their activities and for maintaining back-up systems and equipment and other resources. Along with their own inspection targets **0.5FTE**

Admin Support

The existing admin support of 5 staff is shared between 3 teams and the FTE for food safety is 1.8, A substantial part of the Admin teams work is for food safety. Various administrative functions such as inputting data onto the FLARE system, preparing correspondence etc. will be carried out by technical staff at the expense of fieldwork due to the increased demands on the Admin team.

Management

The Environmental Health Commercial Service Manager is responsible full time for management functions and approximately 0.25 FTE of the 3 PEHO's is accounted for in management functions. Total for management is therefore **1.25FTE**

A summary of resources required to meet the requirements of the service plan for 2009/10, allowing Tower Hamlets to obtain a position in the top quartile of high performing councils in relation to the number of high risk inspections carried out that are due to be carried out is shown in Table 7:

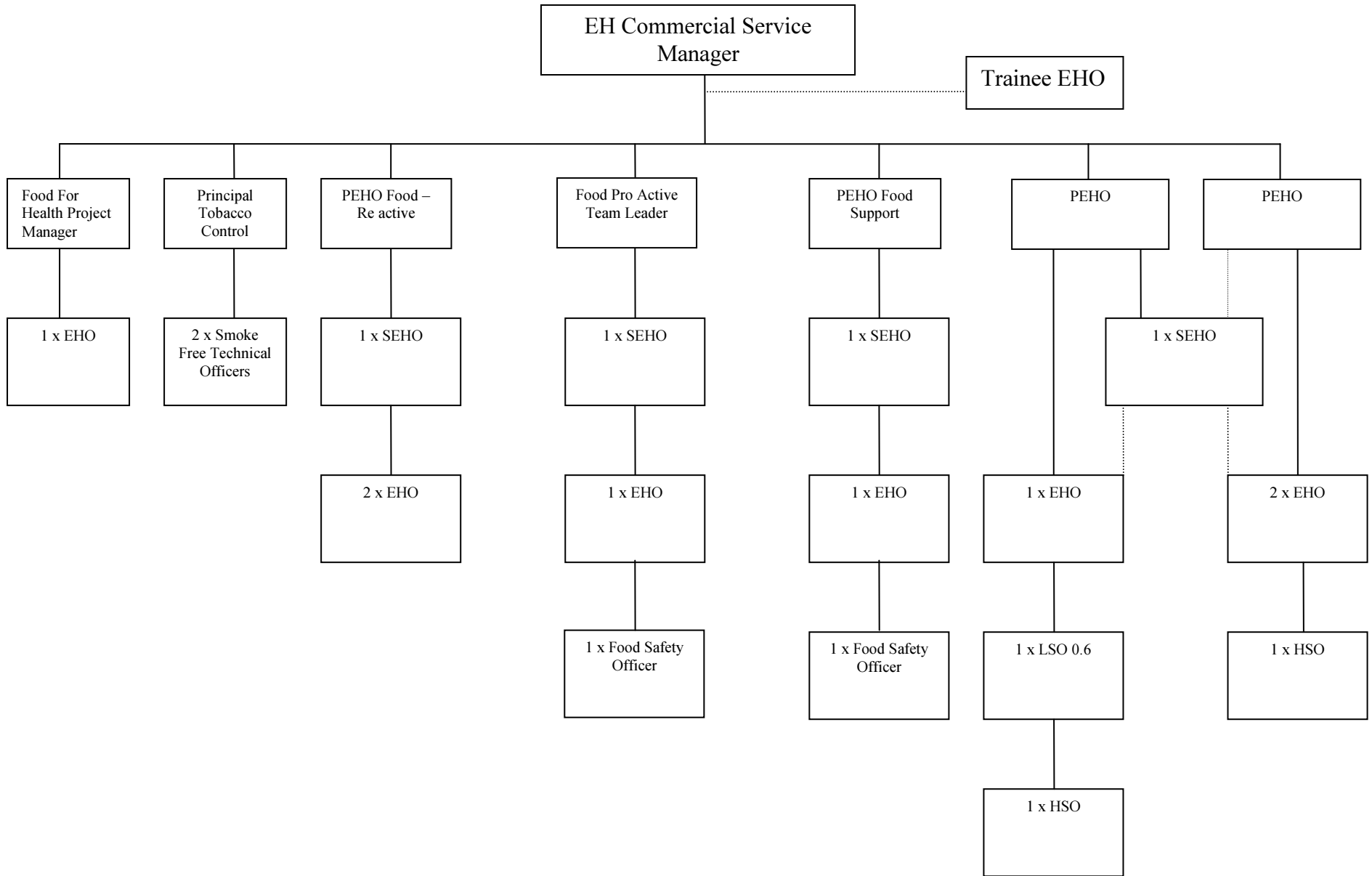
Table 7

Activity	Time identified to complete work in Service Plan (2009/2010)	Time identified to complete work in Service Plan (2008/2009)
Programmed Inspections	3.5	4
Re-inspection	1.4	0.86
Food standards	0.1	0.1
Service Requests	2.2	2.2
Home Authority	0.25	0.25
Advice to businesses	0.5	0.32
Food sampling	0.7	0.7
Liaison	0.2	0.2
Food Safety Promotion	0.6	0.6

Food Poisoning outbreaks	0.3	0.8
Other Activities	1.5	0.9
Management	1.25	1.25
Technical Officer Support	0.5	0.5
Total	13 (Actual available 12.5)	12.68 (Actual available 12.5)

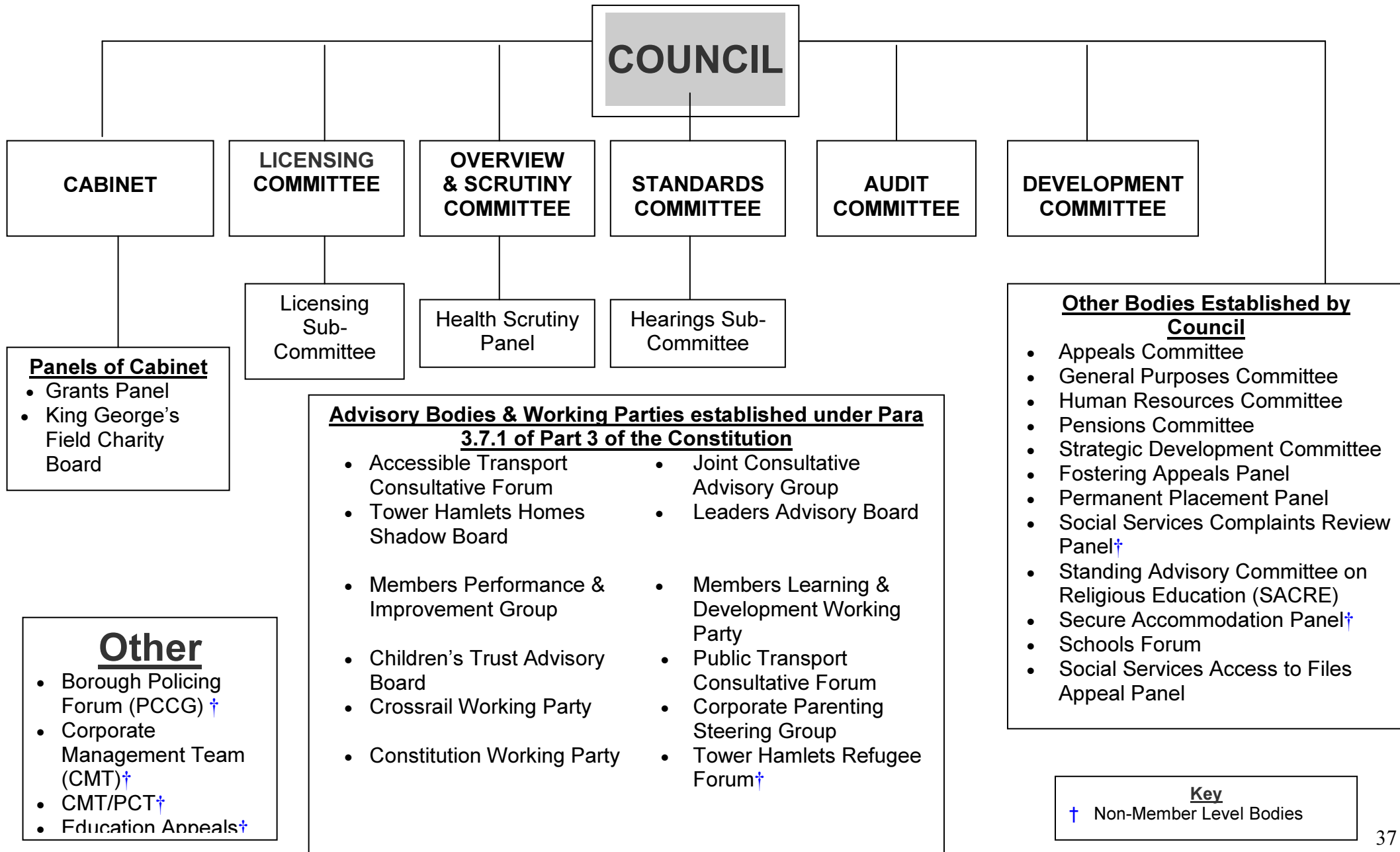
The shortfall identified is 0.5FTE should not prevent us from fulfilling the plan providing we can retain our current agency staff while we recruit.

The estimate of time allocation is from the previous years experience, we will undertake less promotional activity to fulfil our statutory requirement to protect the public health within the Borough.

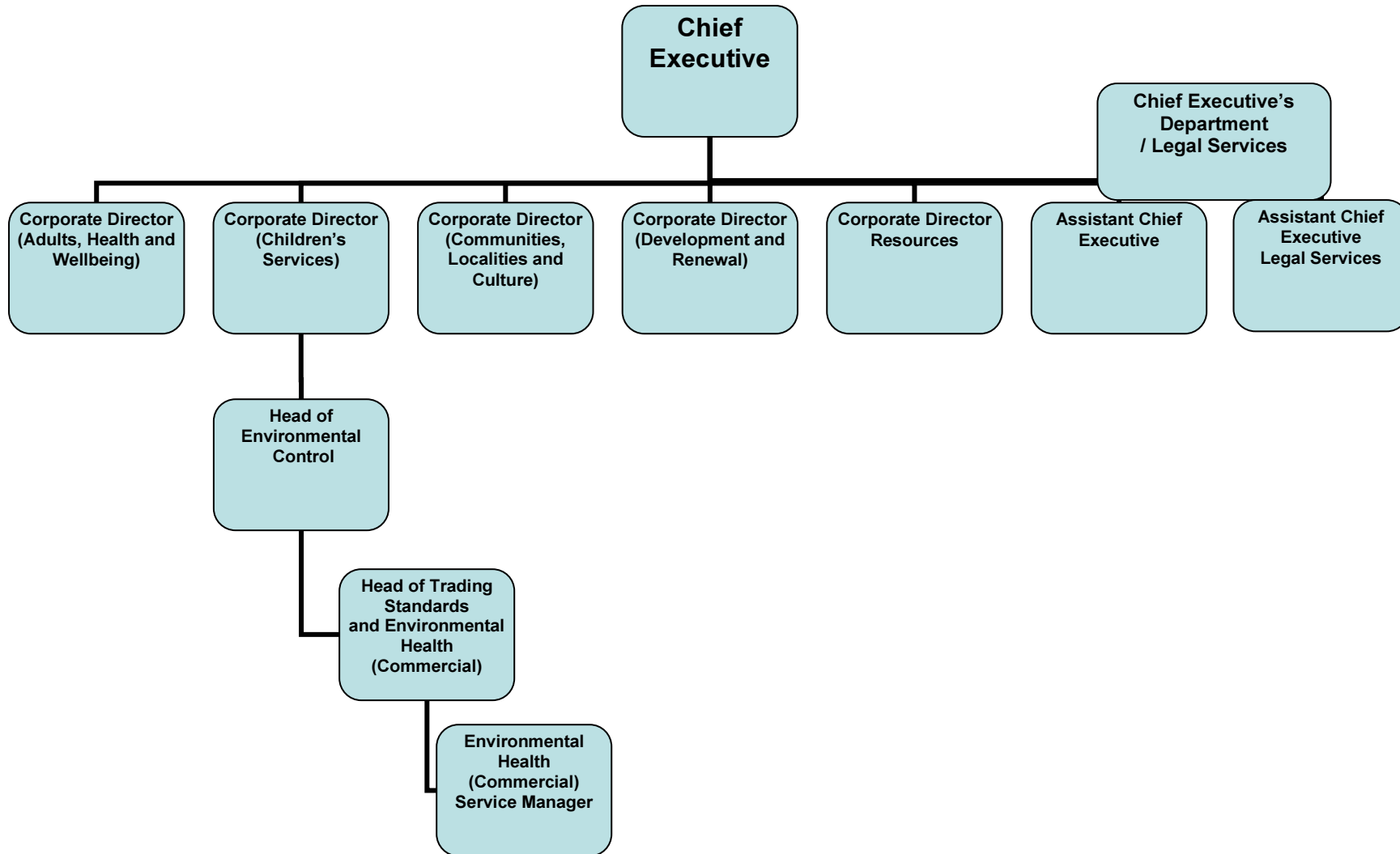


Annex B: Environmental Health Commercial Team Structure

Annex C: TOWER HAMLETS DECISION MAKING STRUCTURE



Annex D - LB Tower Hamlets – Top Level Structure



Annex: E

Environmental Health Commercial Team Plan 2009/2010

Including:

- Food Safety**
- Health and Safety**
- Infectious Disease**
- Environmental Health Licensing**
- Smoke Free**
- Healthier Food Choices Award**

Regulators' Compliance Code: Statutory Code of Practice for Regulators

This Team Plan has been compiled by using the current information available on the level of risk presented by business in the Borough at the commencement of the year 2009/10. The aim of the Team Plan is to provide a risk based proportionate and targeted approach to regulatory inspection and enforcement in relation to the Environmental Health Commercial function.

The risk based focus of the Plan is derived from the relevant risk rating for the premises and the information provided by the FIT 3 programmes from the Health and Safety Executive.

Risk assessment has informed the setting up of the Plan in its broadest sense and specific risk assessments are undertaken, where possible at the premises to inform future interventions.

Business consultation will take place as part of the Corporate Programme and feedback will be sort formally from businesses and informally from Inspectors.

This Plan will allow's us to use our resources more effectively whilst assessing high risk activities but delivering benefits to low risk and compliant businesses.

We have developed business training and seminars as part of our programme of work activity and have an enforcement policy that responds proportionately to regulatory breaches.

The interventions proposed in this Plan will be reviewed regularly to ensure unnecessary burdens are not placed on businesses.

Information and advice will be provided to businesses in the form of letters, proformas during the visit and central agency produced guidance. Such written advice will stipulate legal requirements and recommendations and good practice where noted.

We will attempt at joint inspections where risk assessment schemes indicate that this will be necessary and assist in reducing burdens to the regulated entity.

We will make clear the reasons for any formal action, these reasons will be informed in writing and details of appeal procedures will also be given.

Functional Areas (Scope of the Service)
<ul style="list-style-type: none"> • Accountability to Food Standards Agency (FSA): To meet specified levels and standards of service as laid down by the FSA and submit and publish information on performance as required.
<ul style="list-style-type: none"> • Accountability to Health and Safety Executive Board (HSEB): To meet specified levels and standards of service as laid down by the Board and submit information on performance as required.
<ul style="list-style-type: none"> • Food Hygiene Enforcement: Pro-active and reactive inspections and revisits of food businesses to protect public health & to assess & seek compliance with food safety legislation & to provide advice on good hygiene practice.
<ul style="list-style-type: none"> • Health and Safety Enforcement: To embrace and localise the HSEB Strategic Plan and identify local priorities. Undertake agreed project/priority inspections as agreed with the Health and Safety Executive's Local Partnership Manager.
<ul style="list-style-type: none"> • Food Standards Enforcement: Pro-active and reactive inspections and revisits of food businesses to assess & seek compliance with food standards legislation in relation to food safety & to provide advice on good practice.
<ul style="list-style-type: none"> • Programmed Inspection: Pro-active inspections of businesses for Food Hygiene/Standards and Health and Safety are carried out in accordance with a risk-based Inspection Programme based upon national criteria and guidance.
<ul style="list-style-type: none"> • Imported Food Control: Pro-active and reactive visits to premises to check for compliance with Imported Food Controls. Identification of illegally imported products, sampling, seizure and detention.
<ul style="list-style-type: none"> • Training: Provision of training & help & advice to businesses on safety issues, and compliance with safety law. Promote low cost training to Small to Medium Enterprise's, young workers and vulnerable groups.
<ul style="list-style-type: none"> • Food Sampling: The sampling, analysis and examination of foodstuffs to assess compliance with chemical, compositional, labelling or microbiological criteria in accordance with legislative standards or food safety requirements. Samples are taken as part of local, regional, national, or EU programmes and the service has a programme of sampling from local manufacturing businesses.
<ul style="list-style-type: none"> • Healthier Food Choices Awards: To develop the criteria for the Healthier Food Choices Awards and engage business to offer healthier food choices and to award them for having healthier food choices.
<ul style="list-style-type: none"> • Environmental Sampling: To undertake a program of relevant safety, health and environmental sampling, where the determined risk warrants such action i.e. legionella.
<ul style="list-style-type: none"> • Consumer Advice, Education and Health Promotion: The provision of safety advice to consumers or individuals or groups, including those proposing to provide foodstuffs at events etc. Displays and information are provided on safety issues. Talks are given to interested groups. Promotion of safety related initiatives and reward schemes.
<ul style="list-style-type: none"> • Business Advice: Upon request, persons setting up new businesses and proprietors of existing businesses are provided with advice, guidance & information on meeting safety legislation. Support SME's to receive training and advice on health, safety and welfare issues via targeted projects to assist their development and regeneration. Develop links and utilise opportunities with the Local Area Partnerships through the Primary Care Trust and Community Pan Action Groups.

<ul style="list-style-type: none"> • Home Authority Advice: Acting as Home Authority or Originating Authority for many food manufacturers, processors and distributors in the borough, advising on food hygiene and food standards issues. The service also provides information to and liaises with other enforcement authorities and the local businesses.
<ul style="list-style-type: none"> • Smoke Free Public Places: To devise compliance strategies for the legislation. Work with the PCT and develop strategies for smoking cessation. The implementation of the Smoke Free Awards to the private/public sector.
<ul style="list-style-type: none"> • Smoke Free Enforcement: Enforce the provisions of the Health Act 2006, to ensure smoking in enclosed places is prohibited. This includes compliance strategies for commercial shisha premises. To carry out joint work on the labelling of the tobacco products with Trading Standards
<ul style="list-style-type: none"> • Approval Functions: Inspecting businesses subject to approval (e.g. fish, meat products, dairy products), and providing detailed schedules of works and upon satisfactory completion issuing a unique establishment "Approval" Number (or Health Mark).
<ul style="list-style-type: none"> • Health Certificates and Condemnation Certificates: At the request of local businesses, foodstuffs are inspected and certificates issued for foods proposed to be exported outside the EU, or for condemnation and disposal of unfit, unsound or unwholesome food.
<ul style="list-style-type: none"> • Food Alerts/Food Safety Incidents: In response to notifications from the Food Standards Agency, investigations are carried out into food alerts where foodstuffs are considered to be a danger to health have or may be distributed in the borough. Investigations (sometimes major) are also carried out into other incidents relating to food safety.
<ul style="list-style-type: none"> • Service Requests: Investigations are carried out into complaints by consumers, members of the public, businesses, other authorities and agencies regarding food safety and health and safety in premises within the borough.
<ul style="list-style-type: none"> • Billingsgate Fish Market: Supervision of food hygiene and food standards within the market. Sampling and inspection of fish for fitness. Enforcement of food hygiene and food standards. Liaison with Market Authority and enforcement of issues under the control of the Market Authority.
<ul style="list-style-type: none"> • Maintenance of Information on Businesses: An accurate record of all known businesses located in the borough are kept and a register of food businesses maintained. New businesses are identified and added to the database and businesses that cease trading are removed.
<ul style="list-style-type: none"> • Social Services and Education Service Advice: Inspections are carried out of local authority controlled food premises (e.g. schools, day care centres, and residential homes) and advice and information provided to both client and contractor as appropriate.
<ul style="list-style-type: none"> • Liaison Arrangements: The service maintains links and liaises with other authorities as part of the London Food Co-ordinating Group (NorthEast Sector Liaison Group). The service also liaises and consults with LACORS, Food Standards Agency HSC/E and the All London Boroughs Health and Safety Liaison Group.
<ul style="list-style-type: none"> • Major Investigations: The service may have to carry out major investigations into illegal food activities and fatal/major accidents that may occur throughout the year.
<ul style="list-style-type: none"> • Customer Care: To ensure staff accountability, fairness, openness, helpfulness and consistency in relation to the Team's enforcement processes, through regular case reviews.

<ul style="list-style-type: none"> • Intermediary: Promote the role of the Team, as an intermediary between Small to Medium Enterprise’s, the Primary Care Trust and Corporate Business. Development to revolve around the health agenda.
<ul style="list-style-type: none"> • Community Safety: Develop project areas and advise employers, employees and the public on aspects of safety in the workplace and risks arising out of work activities. Seek compliance with legislation and good practice.
<ul style="list-style-type: none"> • Licensing Process, inspect and regulate Massage and Special Treatment Licensed premises and Animal Welfare Licence-holders to maintain the Council’s agreed standards.
<ul style="list-style-type: none"> • Food Poisoning Outbreak Investigation: Investigations at premises, which may be linked to outbreaks or cases of food poisoning.
<ul style="list-style-type: none"> • Infectious Disease Control: Receive notifications of Infectious Disease (bacterial and viral) monitor cases, contacts and outbreaks to control the spread of disease.
<ul style="list-style-type: none"> • Liaison with Infectious Disease Control Organisations: Liase with the Health Protection Agency representative (CCDC) regarding the notification of infectious disease. Invoke the local outbreak plans as necessary. Act as the proper officer under the Public Health (Control of Disease) Act 1984.
<ul style="list-style-type: none"> • Education and Advice: Educate and advice organisations and individuals on infectious diseases, to raise awareness of control and to assist in the prevention of spread of ill health in the Borough.
<ul style="list-style-type: none"> • Temporary Event Notifications: Be a focus of technical expertise; and to intervene with health and safety legislation where necessary to ensure safe provision for arts and sport within the Borough.
<ul style="list-style-type: none"> • Act as a responsible authority: To be a consultee on new and varied applications for licences under the Licensing Act 2003.
<ul style="list-style-type: none"> • Consultations: Advice and or observations are given in response to various consultations about premises (e.g. planning applications, night cafe licences, premises licences, justice’s licences, market service referrals and building control applications).

Functional Aims and Objectives	<i>Action & Target</i>	Responsibility
Food Hygiene		

<ul style="list-style-type: none"> To carry out a programme of risk based food hygiene inspections and to take appropriate follow-up/enforcement action in accordance with departmental policies and procedures, Code of Practice, Food Standards Agency and LACORS guidance. 	<ul style="list-style-type: none"> Annual inspection programme to be produced during 1st week April 2009. Programme of inspections to be produced quarterly. Up to 441 inspections (Categories A-B and unrated) to be carried out. Includes inspections carried over from 2008/9 and 231 un-rated premises at beginning of year. C –D rated premises that are broadly compliant have an official control which is not a full inspection. This equates to 852 premises C-D rated premises that are not broadly compliant will have a full inspection. This equates to 204 premises Alternative Enforcement Strategies will be carried out for 83 E rated premises. Officers to complete 15 -20 programmed inspections pro-rata per month, subject to other allocated responsibilities and type of intervention inspection. Promote SFBB during inspections and to train out where lacking Premises to be risk rated when investigating a Service Request 	<p>DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS</p>
<ul style="list-style-type: none"> To carry out revisits to premises identified as requiring remedial action upon inspection and to take appropriate follow-up/enforcement action in accordance with departmental policies and procedures, Codes of Practice, Food Standards Agency and LACORS guidance. 	<ul style="list-style-type: none"> 100% of all Category A premises. All Category B premises with a high score for significant risk or where score is 20+ for Confidence in Management or the premises is not broadly compliant. All other premises revisited according to inspecting officer's judgement. Re inspected premises will be risk rated again as per the guidance in the FSA code of practice. 	<p>DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS</p>
<p>Food Standards</p>		
<ul style="list-style-type: none"> To carry out a programme of risk based food standards inspections and to take appropriate follow-up/enforcement action in accordance with departmental policies and procedures, Codes of Practice, Food Standards Agency and LACORS guidance. 	<ul style="list-style-type: none"> Annual inspection programme to be produced during 1st week April 2009. Programme of inspections to be produced quarterly. Up to 891 inspections (Categories A – B and Un-rated) to be carried out by team. Includes inspections carried over from 2008/9 and 354 un-rated premises at beginning of year. Officers to complete programmed inspections as allocated each period. Where food hygiene and food standards are 	<p>DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS</p>

	<p>both due during the financial year, inspections will be carried out at the same time.</p> <ul style="list-style-type: none"> • Apart from A category, it is unlikely that Food Standards inspections will be carried out on their own. Food Hygiene will be the lead risk indicator. • To consider outcomes of Halal meat labelling project and review impact in 09/10. Project duration one week 	
<ul style="list-style-type: none"> • To carry out revisits to premises identified as requiring remedial action upon inspection and to take appropriate follow-up/enforcement action in accordance with departmental policies and procedures, Codes of Practice, Food Standards Agency and LACORS guidance. 	<ul style="list-style-type: none"> • All Category A premises where score is 30 for Confidence in Management. • All other premises revisited according to inspecting officer's judgement. • Re inspected premises will be risk rated again as per the guidance in the FSA code of practice. 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
Alternative Enforcement Strategies		
<ul style="list-style-type: none"> • To carry out suitable alternative enforcement strategies for low risk premises for both food hygiene and food standards. 	<ul style="list-style-type: none"> • Alternative enforcement strategies to be applied on a project basis to all premises rated Category E for hygiene and Category C for standards due for 2009/10. • Approximately 5% of AES premises to require an inspection. 6 inspections for Food Hygiene and 16 for Food Standards. • Unreturned questionnaires to be followed up by Food Safety Officer's 	DT, BMI, KIG
Illegal Food Investigations		
<ul style="list-style-type: none"> • To undertake investigations into premises and businesses engaged in production, distribution, importation and selling of illegal foods including meat and fish. 	<ul style="list-style-type: none"> • To carry out routine checks for illegal food when undertaking routine inspections. • Investigate cases of illegal foods and illegal importation of foods and take appropriate follow up actions. • To build in a project specifically looking for illegal imported foods. Based on products of animal origin. Two projects to be undertaken during the year in June and January 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
Health and Safety		
<ul style="list-style-type: none"> • To carry out a programme of health and safety inspections in food premises, wherever possible at the same time as carrying out food safety inspections and to take appropriate follow-up/enforcement action in accordance with departmental policies and 	<ul style="list-style-type: none"> • Joint inspections to be carried out with regards to Warehouse Safety. • Completion of Regulators Development Needs assessment • Staff to attend awareness seminars and undertake projects on health and safety issues in relation to: 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS

<p>procedures, Codes of Practice and HSE/HELA guidance.</p>	<p>Plant and Equipment in Food premises Band saws where necessary Asbestos – all visits A rated health and safety 'Food' premises Delivery Hatches Joint inspections with Health and Safety in Food Warehouses that fall due this year.</p> <ul style="list-style-type: none"> • 	
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Imported Food Control		
<ul style="list-style-type: none"> • To undertake planned inspection, sampling and investigation of imported foods and to remove illegally imported food from the food chain and to educate business. 	<ul style="list-style-type: none"> • Identify during all routine inspections whether business is an importer. • Two projects undertaken during the year – one week duration at each project 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS

Special Projects		
<ul style="list-style-type: none"> • To devise and implement relevant projects on issues identified on a planned basis or as issues arise throughout the year. 	<ul style="list-style-type: none"> • To carry out projects in the following areas. Projects to have defined aims and objectives with a project proposal in each case. • SFBB to target the A rated premises with 121 coaching • C rated Catering/Retail premises that are broadly compliant to be visited on a verification basis. To verify status in regard to temperature control, hand washing, pest control and cross contamination. 737 premises • To develop a Tower Hamlets response to the Olympic Food programme. • To work with Arts and Leisure to provide advice and guidance at outdoor events for food handlers 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS

Approval Processes

<ul style="list-style-type: none"> • Billingsgate 	<ul style="list-style-type: none"> • Provide attendance at Billingsgate Market to ensure statutory functions are fulfilled and public health protected. • Advise and support Corporation of London and individual merchants in the market on works required achieving 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
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	<p>approval.</p> <ul style="list-style-type: none"> • Approve or conditionally approve all businesses within the market. • Attendance to be fortnightly 	
<ul style="list-style-type: none"> • Approval Processes – Ensure identification and approval or enforcement of any relevant Establishments. 	<ul style="list-style-type: none"> • Approval or enforcement within 6 months of issuing schedules. 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
<ul style="list-style-type: none"> • Approval Processes - Ensure inspection of all approved premises in line with the Code of Practice requirements. 	<ul style="list-style-type: none"> • Approved premises to be inspected in accordance to food hygiene risk rating. 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
<ul style="list-style-type: none"> • Approval Processes – Continue pro-active role in the NorthEast Sector Liaison Group Vertical Products Sub-Group. 	<ul style="list-style-type: none"> • Attend meetings. Complete allocated tasks within timescales set. Circulate meeting minutes to team. 	BMI
Food Sampling		
<ul style="list-style-type: none"> • Publish and follow sampling programme for 2009/2010. 	<ul style="list-style-type: none"> • Publish April 2009. Sampling ongoing. • Finalise and produce draft plan by March 2009. • Participate in NorthEast Sector Liaison Group Sampling Sub-Group meetings and any co-ordinated sampling programmes. • Carry out sampling activities in accordance with plan. • Sampling Plan to concentrate on projects that will have a local outcome 	FB FB FB FB
<ul style="list-style-type: none"> • Monitor spending for sampling budget to ensure planned spending is completed. 	<ul style="list-style-type: none"> • Monitor spend and results & report to EHCSM. 	FB, DT
Food Safety Training/Business Support		
<ul style="list-style-type: none"> • To provide training courses and seminars for business throughout the year. 	Provide information to businesses on availability of training courses, including free and low cost training from relevant providers. Investigate the possibility of carrying out Foundation level Food Hygiene courses in house	FB, BMI
<ul style="list-style-type: none"> • To provide information and advice to businesses. 	<ul style="list-style-type: none"> • Produce business newsletter 3 per year. 	FB
Food Item Complaint Investigations		
<ul style="list-style-type: none"> • Investigate all complaints in accordance with documented procedures. 	<ul style="list-style-type: none"> • Direct allocation to PEHO - incoming workload checked daily. • Priority complaints collected on day of complaint. • Other complaints within 5 working days 	FB, BMI

<ul style="list-style-type: none"> • Case reviews. 	<ul style="list-style-type: none"> • Random cases reviewed by PEHO at 121's. 	FB, BMI
<ul style="list-style-type: none"> • Customer Care. 	<ul style="list-style-type: none"> • Contact to complainant informing outcome on completion of case. 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
Premises Complaints		
<ul style="list-style-type: none"> • Investigate all complaints in accordance with documented procedures. 	<ul style="list-style-type: none"> • Direct allocation to officer - incoming workload checked daily. 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
<ul style="list-style-type: none"> • Priority based action. 	<ul style="list-style-type: none"> • Higher risk issues – contact complainant within 2 working days - action in accordance with policies and procedures. • Lower risk issues – contact complainant within 5 working days – action based upon premise history and in accordance with policies and procedures. 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
Other Requests for Service		
<ul style="list-style-type: none"> • Respond to all requests in accordance with documented procedures. 	<ul style="list-style-type: none"> • Direct allocation to officer - incoming workload checked daily. 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
<ul style="list-style-type: none"> • Priority based action (including Freedom of Information Act requests). 	<ul style="list-style-type: none"> • Requests for service, 1st response within 5 working days – action in accordance with policies, procedures and statutory requirements. • Response to Freedom for Information requests within 20 days via the Information Governance Team 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
Business Advice		
<ul style="list-style-type: none"> • Respond to requests for business advice. 	Respond to requests for advice on food safety and health and safety, 1 st response within 5 working days	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
Food Hazard Warnings/Food Safety Incidents		
<ul style="list-style-type: none"> • Respond to all Food Alerts/Food Safety Incidents in accordance with documented procedures. 	<ul style="list-style-type: none"> • Brought to attention of PEHO immediately. • Immediate response to Warning/Incident depending upon nature, category and relevance. • Action taken fully documented electronically. 	FB, BMI Admin
Health Certificates		
<ul style="list-style-type: none"> • Respond to all Health Certificate Requests in 	<ul style="list-style-type: none"> • Direct allocation to PEHO -incoming workload checked daily. 	DT, FB, BMI, ID,

accordance with documented procedures.	<ul style="list-style-type: none"> • Certificate or other response produced within 5 days. 	AK, EV, HAC, GAK, KIG, RZ, JOS
Condemnation/Voluntary Surrender of Food		
<ul style="list-style-type: none"> • Respond to all requests for Condemnation Certificates/Voluntary Surrender of food in accordance with documented procedures. 	<ul style="list-style-type: none"> • Direct allocation to PEHO - incoming workload checked daily. Certificates issued/surrender accepted where appropriate, within 1 working day for perishable/deteriorating goods and within 5 working days for ambient stable goods. 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
Consultations		
<ul style="list-style-type: none"> • Respond to consultations for Planning, Building Control & Markets Service referrals in accordance with documented procedures. • Assess notifications of applications for variations of Premises Licences under the new Licensing Act and respond accordingly. 	<ul style="list-style-type: none"> • Direct allocation to PEHO - incoming workload checked daily. • Target response time 5 days or as specified by consultee. • Visit premises and object where necessary. 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
Food Premises Registration		
<ul style="list-style-type: none"> • Full inspection and Inspection Rating of new premises. 	<ul style="list-style-type: none"> • Newly registered premises to be inspected as part of program • Report to be run to identify these premises on a monthly basis and added into inspection programme • Consider process for logging on new registrations when premises are not open for business. 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
<ul style="list-style-type: none"> • Ensure all relevant premises are required to register. 	<ul style="list-style-type: none"> • New premises invited to register as soon as identified. • Premises requiring amended registration invited to do so as soon as identified. 	DT, SEW, FB, ID, AK, EV, BMI, HC, RZ, JOS
Home Authority		
<ul style="list-style-type: none"> • Respond to all requests from or about Home/Originating Authority businesses in accordance with documented procedures. 	<ul style="list-style-type: none"> • Direct allocation to PEHO - incoming workload checked daily. • 1st response within 5 working days. • Hygiene, labelling or compositional etc. advice, response within 2 weeks. • Enquiries by other authorities/agencies, response within 2 weeks. • Impact of Primary Authority to be considered, referrals made as per LBRO guidance when agreed 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS

Other Operational Issues

Smoke Free Public Places	<ul style="list-style-type: none"> Promote Smoke Free Public Places Implement legislation Include promotional guidance in all visits/correspondance 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
Scores on the Doors	<ul style="list-style-type: none"> Await the FSA national Scheme, attend training and develop data base. Officers to be aware of scheme and work under its criteria 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
Education/Food Safety Promotion		
<ul style="list-style-type: none"> Participate in National Food Safety Week. 	<ul style="list-style-type: none"> Finalise programme by May 2009. Deliver initiative June 2009. Interactive display. Commence development of programme for 2010 in Jan/Feb 2010. 	FB, BMI
<ul style="list-style-type: none"> Miscellaneous Food Safety Promotion Activities. 	<ul style="list-style-type: none"> Examine opportunities to participate in appropriate schemes, deliver talks, publish information and provide displays for suitable groups or at events or locations throughout the year. Deliver education in accordance with above as appropriate. Delivery of an Allergens awareness seminar to caterers. 	FB, BMI
<ul style="list-style-type: none"> Brick Lane Master Chef 	<ul style="list-style-type: none"> Explore possible funding, link to broadly compliance and pest control advice 	FB, BMI
<ul style="list-style-type: none"> Healthier Food Choices 	<ul style="list-style-type: none"> To delivery and raise awareness about the scheme, encourage businesses to join in. All staff to be involved in raising awareness during broadly compliant inspections – handing out publicity material 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG, RZ, JOS
Inter-Departmental Liaison		
<ul style="list-style-type: none"> Lead officers to liase with other services. 	<ul style="list-style-type: none"> Children Services regular liaison meetings, Adult Services regular liaison meetings Provide advice on appropriate policies and procedures to Children/Adult Services with regard to their responsibilities under food safety legislation. 	FB, BMI
Information and Library		
<ul style="list-style-type: none"> Food Safety Leaflets/Posters/other information. 	<ul style="list-style-type: none"> Check stock of leaflets/posters/food safety information every month and make appropriate orders. Inform team of new materials within 2 weeks of arrival. 	RZ, JOS

<ul style="list-style-type: none"> Library procedures. 	<ul style="list-style-type: none"> Reference books and other materials to be properly catalogued upon arrival. 	RZ, JOS
<ul style="list-style-type: none"> EHCNet. 	<ul style="list-style-type: none"> Monitor effectiveness of system for dissemination of information. Monitor system for monitoring of relevant Websites (Food Standards Agency & LACORS) at appropriate intervals. 	DT, ADMIN
Equipment Control		
<ul style="list-style-type: none"> Inventory for equipment. 	<ul style="list-style-type: none"> Update inventory within 1 week of new arrivals. 	DT
<ul style="list-style-type: none"> Ensure equipment control procedures are working. 	<ul style="list-style-type: none"> Monitor use and control of equipment & audit system every 3 months. 	RZ,
<ul style="list-style-type: none"> Ensure all equipment is calibrated and maintained in working order. 	<ul style="list-style-type: none"> Arrange maintenance and calibration so that all equipment conforms to relevant specification and Codes Of Practice. 	JOS
<ul style="list-style-type: none"> Ensure adequate stocks of consumables (bags, seals etc). 	<ul style="list-style-type: none"> Check stock every month and make appropriate orders. 	JOS
<ul style="list-style-type: none"> Ensure adequate control procedures for Refrigerators and Freezers. 	<ul style="list-style-type: none"> Temperature monitoring of relevant refrigerator and freezer to be maintained. Refrigerators and freezers to be kept clean, regularly defrosted and otherwise maintained in working order. 	JOS
Accountability to Food Standards Agency (FSA)		
<ul style="list-style-type: none"> FSA "Service Planning", "Service Standard" and "Monitoring" Requirements. 	<ul style="list-style-type: none"> Publish FSA Service Plan for 2009/2010 and submit to Members (Cabinet). July 2009. Produce Service Plan for 2010/2011 in accordance with Food Standards Agency requirements. Commence March/April 2010. Audit input of all statistical data to ensure production of accurate returns. Produce and submit all Food Standards Agency Monitoring Return information within timetable set by FSA. 	DT DT DT DT, AH DT, CP
Staff Competencies/Training		
<ul style="list-style-type: none"> <u>All Environmental Health Officers eligible for submission to the CIEH Assessment of Professional Competence (APC) to undertake the assessment.</u> 	<ul style="list-style-type: none"> <u>Relevant EHO's who are Corporate Members currently without APD are encouraged to submit for assessment during the year.</u> 	<u>FB, BMI</u>
<ul style="list-style-type: none"> Staff competencies and training needs to be monitored. 	<ul style="list-style-type: none"> Implement system for regular monitoring of competency during the year by assessment of on site and off site work of field staff and in accordance with PDR scheme. 	FB, BMI
<ul style="list-style-type: none"> Identify appropriate training needs of staff and seek to provide appropriate training to meet 	<ul style="list-style-type: none"> Staff to attend appropriate update-training, courses, and seminars as available subject to budgetary constraints. 	DT, FB, BMI, ID, AK, EV, HAC, GAK, KIG,

Code of Practice, departmental and CPD requirements.		RZ, JOS
Maintenance of Food Premises Database		
<ul style="list-style-type: none"> Monitor and verify database information regularly. 	<ul style="list-style-type: none"> New premises identified and added to database by cross-referencing other sources of information and by observation/street surveys. Monitor and verify inputting of Premises, Inspection, Service Request, Sampling and Prosecution information onto FLARE database. 	Admin, AH DT, FB, BMI
Departmental Operations		
<ul style="list-style-type: none"> <i>Continually review methods of working and operational activities to seek to identify further efficiencies in provision of services.</i> 	<ul style="list-style-type: none"> Assess identified improvements to service and implement as appropriate 	DT, FB, BMI
Health and Safety Enforcement		
<ul style="list-style-type: none"> Reactively investigate selected accidents that fall within the scope of the section's policies. Proactive work to be undertaken in line with the Customer Promise. 	<ul style="list-style-type: none"> Investigations to be undertaken in line with the Sections Enforcement Policy on a risk priority approach. However the following action will be taken: Investigate all slips, trips and falls where a broken bone results as reported under a RIDDOR notification. Investigate all fatal accidents and major reportable accidents. All asbestos removal to be supervised, recorded and feedback given to the HSE. Ensure required works to defective lift notifications are executed within a legal framework. Investigate all Service Requests, first response to be within 5 working days 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<ul style="list-style-type: none"> Involvement with non-licensed events 	<ul style="list-style-type: none"> To ensure compliance with health and safety standards at large venues within the Borough i.e. Trumans Brewery and Tobacco Dock. Work with Enforcement Officers within the Team to achieve compliance. To identify relevant Food retailing operations and provide guidance in liaison with Food Safety Officers. 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<ul style="list-style-type: none"> Provide clear, concise and referenced technical information to the applicant and Trading Standards if making health and safety representations on a licence 	<ul style="list-style-type: none"> Review applications as they are presented. Attend all relevant meetings with the applicant 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,

application.		
<ul style="list-style-type: none"> Undertake enforcement action in line with the Departments Policy 	<ul style="list-style-type: none"> Formal action to be instigated and prosecutions/simple cautions to be considered in line with current Codes of Practice and HSC Policy Statement, in agreement with the Legal Team and EHCSM. 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<ul style="list-style-type: none"> Undertake a risk-based programme of proactive inspections. Inspections to be undertaken using SMART targets. Each project to have deliverable aims and objectives. Project shall consider the appropriateness of business seminars during the project planning stage. 	<ul style="list-style-type: none"> Risk priority inspections to be undertaken with regards to HELA advice and agreement with the HSE Partnership Manager. Total of 750 primary inspections/sampling, including a total of 100 MST, Pet Shop Licences to be undertaken by the Team as per resources on 1/4/09. Individual monthly targets CAS 8 SEW – 8, RDW - 10, FE-14, WS – 14, SM - 7, AR – 14, KMO - 7 AMA -10 . Including MST, launderettes, Pet Shop and event inspections. 8.5% of commercial premises will be inspected by the Unit. Undertake relevant re-inspections in line with the Inspection Protocol – where notices are necessary 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<ul style="list-style-type: none"> To be one of the leading Boroughs in the HSE Stress in the Financial Sector programme. To facilitate the HSE Stress Management Standards within the Financial Sector. 	<ul style="list-style-type: none"> To act as a lever to persuade 10 organisations to join the HSC/E Stress Project. To participate in seminars and training in the stress management standards. Anticipated 20 contacts to be made. 	SEW
<ul style="list-style-type: none"> To target Events where Control of Noise at Work Regulations 2005 may be an issue. 	<ul style="list-style-type: none"> To raise awareness of current control levels at out side events 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<ul style="list-style-type: none"> To inspect the current A rated premises within the generic FIT 3 areas with a view to assess the current rating of these premises in accordance with the new priority planning guidance 	<ul style="list-style-type: none"> To carry out themed FIT 3 inspections within the A rated premises To include Food premises where food hygiene inspection not due this year 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<ul style="list-style-type: none"> To carry out enforcement visits in relation to the duty to manage asbestos 	<ul style="list-style-type: none"> Undertake 40 specific enforcement inspections to target asbestos management 	DT, CAS RDW, WS, SM, AR FE, AMA, KMO, and Food Officers
<ul style="list-style-type: none"> To examine the current individuals that are exempt from MST licences 	<ul style="list-style-type: none"> Undertake inspections to determine if exemptions are still relevant 	DT, SEW, CAS RDW, WS, SM, AR

		FE, AMA, KMO, DT, CAS, SEW, RDW
<ul style="list-style-type: none"> To carry out awareness raising on safety issues with the Food Officers. To support Food Safety Officers and lead on complex cases or to act as a point of referral for action 	<ul style="list-style-type: none"> Awareness seminars to be undertaken on the following subjects. Delivery Hatches Machine Safety – Bandsaws Asbestos Fit 3 topic inspections in A rated health/safety food premises 	
<ul style="list-style-type: none"> To review the impact of glove usage and chemical control within Hairdressers 	<ul style="list-style-type: none"> To build on the previous work carried on in this area, examining glove usage and chemical controls using guidance produced by HABIA 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<ul style="list-style-type: none"> Violence, to review the current status of Betting Shops, Off Licences and Estate agents where violence and working alone could be an issues. 	<ul style="list-style-type: none"> To raise the profile of the Violence toolkit within targeted premises Work with the Police on identified ‘targets’ Monitor Betting Shops in accordance with the ABB SafeBet document 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<ul style="list-style-type: none"> Legionella Control 	<ul style="list-style-type: none"> To audit and inspect high risk Cooling Towers 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<ul style="list-style-type: none"> Sampling Plan 	<ul style="list-style-type: none"> Develop a sampling plan for indicative bacteria that may result in cross contamination to individuals. The Plan to be costed and delivered by October 2009 	DT SEW
<ul style="list-style-type: none"> Animal welfare and Zoonotic infections. 	<ul style="list-style-type: none"> Inspect City Farms in relation to animal welfare and zoonotic infections. Liaise with RSPCA and Police where necessary. 	SM
<ul style="list-style-type: none"> Smoke Free Public Places 	<ul style="list-style-type: none"> To assist in enforcement issues when the need arises To promote the Smoke Free Award 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,

Health and Safety Education/Advice

<ul style="list-style-type: none"> Carry out Safety Health and Awareness Days (SHADS) to dutyholders at the conclusion of the project areas. 	<ul style="list-style-type: none"> Develop routine business seminars 	CAS, SEW, RDW
<ul style="list-style-type: none"> Ensure literature on relevant issues and 	<ul style="list-style-type: none"> An information pack to be sent to all SME after auditing. Target: 	DT, SEW, CAS

languages are forwarded to SME's.	All audited premises	RDW, WS, SM, AR FE, AMA, KMO,
<ul style="list-style-type: none"> European Health and Safety Week October 200 	<ul style="list-style-type: none"> Take part and publicise the European Health and Safety in October 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<u>Customer Care</u>		
<ul style="list-style-type: none"> Ensure that all customers are dealt with fairly and in accordance to the Sections Policies. 	<ul style="list-style-type: none"> Use the standard phrases, time scales and protocols laid down in the Sections Policies. Response: Audit reports in 10 days, complainants contacted in 5 days, less if high risk. Notices: Prohibition, same day, Improvement 3 days 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<ul style="list-style-type: none"> To be open when taking Enforcement Action. 	<ul style="list-style-type: none"> Provide the duty holder with alternatives to complying with the legislation. Give all relevant information on the appeals procedures. Translations notifications where necessary. 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<ul style="list-style-type: none"> To seek publicity at all opportunities 	<ul style="list-style-type: none"> To produce press releases on topic inspections and all prosecutions. 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<i>Intermediary</i>		
<ul style="list-style-type: none"> To exploit all opportunities to promote the sections work with regards to Health and Safety 	<ul style="list-style-type: none"> To work with Corporate business and provide information in a targeted and consistent manner 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<i>Licensing</i>		
<ul style="list-style-type: none"> Determine licence applications within set time-scales. 	<ul style="list-style-type: none"> Licences > 1 month expired face prosecution. Licensees shall be advised of process on application. Standard licence procedure to be followed Target: All Licences 	KMO
<ul style="list-style-type: none"> Consistency with other Local Authorities 	<ul style="list-style-type: none"> Attendance and participation at the MST Working Party, to attend quarterly 	KMO
<ul style="list-style-type: none"> All Licences issued will be visited for non compliance's 	All licensed premises shall be audited once a year, unless complaints are received. This will equate to 100 visits. Target: All premises.	KMO

<u>Infectious Disease</u>		
<ul style="list-style-type: none"> Review and be the point of contact for the control of infectious disease. 	<ul style="list-style-type: none"> To maintain liaison with Emergency Services, Health Protection Agency and PCT 	DT
<ul style="list-style-type: none"> Monitor cases and contacts of infectious disease 	<ul style="list-style-type: none"> Investigate notifications in relation to National and Local Guidelines. Take stool samples to the Local receiving centre. Response: high-risk cases in one day, low risk cases in 5 days. Investigation of Outbreaks Returns to be sent off on a weekly basis as required. 	AMA, DT DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO, Food Officers
<ul style="list-style-type: none"> Production of statistics for external organisations to enable National monitoring of Infectious Disease 	<ul style="list-style-type: none"> To complete the statutory returns as required. Ensure that the database is maintained. Response: to send returns by due date 	DT
<u>Animal Health</u>		
<ul style="list-style-type: none"> Compliance with National Performance Indicator 190 	<ul style="list-style-type: none"> The Team will be responsible for achieving the action plan detailed for compliance with the Animal Health Indicator 190 and follow the action plan laid down for this indicator. This involves animal welfare at the Pet Shops, Farms and Slaughterhouses. 	DT, SEW, CAS RDW, WS, SM, AR FE, AMA, KMO,
<u>Liaison with Infectious Disease Control Organisations</u>		
<ul style="list-style-type: none"> Liase with the Health Authority (CCDC) on notifications of Infectious Disease and other relevant matters To work with the PCT to raise awareness of infectious disease and to implement joint control policies 	<ul style="list-style-type: none"> To meet with the CCDC to discuss notifications. Liase with the Infectious Control Nurse, Carers, as appropriate. Identify trends in relation to certain organisms and undertake full investigations, report quarterly to the HPA forum. Work with the PCT on joint initiatives. 	DT DT DT
<u>Education and Advice</u>		
<ul style="list-style-type: none"> To assist and organise public health projects 	<ul style="list-style-type: none"> To work with other agencies to develop the awareness of Infectious Disease Control in the Borough. 	DT
<ul style="list-style-type: none"> To take part in the enhanced typhoid surveillance scheme. 	<ul style="list-style-type: none"> To assist with the review and provide relevant hard data as requested. 	DT, AMA
<ul style="list-style-type: none"> Promote infection control policies 	<ul style="list-style-type: none"> To advise corporate organisations on the need and implementation of infection control policies 	DT

Annex F

LONDON BOROUGH OF TOWER HAMLETS

FOOD SAMPLING POLICY 2009/10

It is a requirement of the Code of Practice, which outlines procedures for sampling made under the Food Safety Act 1990 and Food Hygiene (England) Regs 2006 that local authorities publish a sampling policy and outline programmes for each financial year.

In common with all London boroughs, Tower Hamlets is part of the London Food Co-ordinating Group (LFCG). This has been set up by ALEHM (Association of London Environmental Health Officers), previously the London Chief Environmental Health Officers' Association in association with LACORS to co-ordinate the food enforcement function of London Boroughs.

Membership of the Group includes Environmental Health Officers, Public Analysts and a representative of the Health Protection Agency. One of the key functions of the Group is the co-ordination of food sampling in London – this is achieved by dividing the 33 London Boroughs into 4 regional sectors, with each sector arranging sampling programmes in its own area only after proper liaison with the other 3 sectors. Tower Hamlets is in the NE sector.

FOOD SAMPLING OBJECTIVES AND PRIORITIES

The main objective of food sampling should be the protection of the consumer through the enforcement of food legislation and the encouragement of fair trading. In attempting to achieve this objective it is important that the Council considers the most effective use of limited resources. Therefore, the Council has identified its food sampling programmes in the following priority order:

- (i) Investigation of food poisoning outbreaks and food contamination incidents
- (ii) Complaints where sampling is necessary
- (iii) Imported food responsibilities
- (iv) Home authority responsibilities
- (v) EU co-ordinated sampling programme
- (vi) HPA/LACORS sampling programme
- (vii) Co-ordinated programmed sampling – with other London Boroughs
- (viii) Local projects in individual boroughs

TYPES OF SAMPLES

There is a need for a common approach to sampling in the Borough, and this is set out as follows:

Random informal samples

- (i) These should be avoided for both chemical and microbiological samples.
- (ii) There is, however, a place for informal samples but principally within a programmed sampling project concentrating on a particular food issue.
- (iii) There will also be occasions when informal samples will be justified when testing a new product or process on the market.

Microbiological samples

- (i) Formal samples being taken in accordance with the Regulations should be the normal procedure.
- (ii) There are no advantages in taking informal microbiological samples – the procedures laid down in the Regulations are in any case good sampling practice and the additional information gathering required is minimal. However, only samples taken with the intention of legal proceedings in the event of adverse results should be submitted to the HPA as Formal samples. In these cases the relevant HPA Formal Sample form should be used.

Chemical samples

- (i) In view of the resource and time implications of taking formal chemical samples it is accepted that a significant amount of chemical sampling will be informal – this is especially the case when project or programmed sampling is being carried out as a monitoring or fact finding exercise.
- (ii) Formal samples should, however, be taken when:
 - Problems and contraventions of legislation are suspected
 - Results are not thought repeatable, e.g. pesticide residues or aflatoxins in food
 - In response to food complaints
 - Repeat sampling following a previous unsatisfactory informal sample

Sampling in manufacturing premises

- (i) The level and type of samples taken at individual manufacturing premises will depend on a number of factors including:
 - The nature of the raw materials, intermediate and finished products
 - The existence or absence of Hazard Analysis Critical Control Points (HACCP) type procedures
 - The existence of in-house quality control systems
 - The level of in-house sampling and the quality of procedures and documentation
- (ii) It is important, however, to ensure that food sampling forms an integral part of routine inspections within the risk assessment system laid down in the relevant Code of Practice and LACORS guidance. Ad hoc samples taken without regard to the above and without set objectives and protocols should be avoided.

SAMPLING PROCEDURE

It is wasteful of resources to carry out sampling without first considering and agreeing the objectives – this is especially the case for any sampling project or programme carried out in conjunction with other London Boroughs.

A sampling and analytical protocol should be prepared in conjunction with the selected laboratory in order to ensure an agreed procedure and to encourage a uniform approach. Clearly the subsequent status of the sampling will depend upon the objectives and protocol agreed.

The results and conclusions from the sampling exercise should be collated and circulated through sector groups. It is recognised that on occasions individual local authorities, sectors or the LFCG will want to consider wider publication.

LEVEL OF SAMPLING

Local authority sampling levels are closely monitored by the Food Standards Agency through returns. This data will be aggregated and returned to Brussels in accordance with the Official Control of Foodstuffs Directive.

CO-ORDINATION

In order to achieve maximum effectiveness and the best use of scarce resources, the Council should ensure that food sampling, other than for reactive duties such as complaints, food poisoning and port health and home authority duties, is carried out in conjunction with the LFCG.

Proposed sampling projects should be cleared initially through the relevant sectors. Sector co-ordinators will be in a position to ensure that other sectors are not proposing to carry out similar surveys – this will avoid duplication.

Reports of surveys should be passed through sectors and ultimately through the LFCG in order to ensure a wide distribution and a sharing of information.

In cases where projects have implications for areas outside London, the completed reports will be submitted to the relevant Food Panel of LACORS.

SUMMARY

The aim of this Policy is to ensure that the Council protects the consumer, and in so doing follows good practice and uses scarce resources in the most effective way.

The Policy is intended only as a guide. It is flexible enough to allow initiative, but points the way forward to a more locally based approach to food sampling.

Nothing in the Food Sampling Policy is intended to preclude initiative on the part of individual enforcement officers – there will be occasion, in circumstances of constant market change, when ad hoc sampling will be necessary.