



Appendix 1

LONDON BOROUGH OF TOWER HAMLETS

FOOD LAW ENFORCEMENT SERVICE PLAN

2008/2009

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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.

The Council is required by the FSA to produce a plan that is ratified by Members.

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 2007/08 and our programme of work for 2008/09.

The Commercial Team carried out 99.6% of all Food Hygiene inspections due and 57.3% 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. We are targeting pest management this year with the aspiration this will result in fewer closures.

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 landscape for food safety will change significantly this year. Monitoring of our food safety service is carried out by the FSA. Our performance will be measured against the fulfilment of the Service plan (30% weighting) and the percentage of broadly compliant premises (70% weighting) within the Borough, not just those that fall due for inspection this year.

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 current have 57% of food premises broadly compliant with an aspiration to increase this by 5% during this performance year.

We have developed a range of interventions aimed at increasing this compliance rate. However, we are hampered by the turnover of businesses in the Borough and the age of the commercial stock.

The FSA are in the process of implementing a new Code of Practice and auditing arrangements for Local Authorities, the impact of which will be reviewed during this year.

A national Scores 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.

We are also developing systems so that we can report back on National Performance Indicator 182 – Satisfaction of businesses with local authority regulation services. We are developing the tools to measure our interaction with businesses that we come into contact with. 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. This priority rating will form the basis of further work within the Local Better Regulation Office. It is expected that guidance will be issued to local authorities on how these priority areas should be resourced and managed. Such guidance is not likely to be issued for at least 6 months.

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

The impact on the food safety service with regards to the above changes has been significant and we have now moved away from inspection for inspection sake and allowing those premises that are broadly compliant to have a lighter touch and those that are not broadly compliant to be advised/enforced against. This has resulted in more resources going to the higher risk premises.

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.

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.

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 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 Good Place to Live**
- **Prosperous Communities**
- **Safe and Supportive Communities**
- **Healthier Communities**

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 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, Heartbeat award schemes, fast food outlets around schools.*
- *Smoke Free enforcement and advice*
- *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, Morrisons, 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
- 1 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 Safer, Cleaner, 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.
- 2.3.4 Agency staff have been employed to deal with some programmed food safety inspections and Service Requests to cover staff vacancies within the team. Currently agency staff make up some of the shortfall in programmed inspections which would not otherwise be carried out. However, have recruited to two vacant posts and reliance on agency will be kept to a minimum.
- 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 25% less high risk premises this year for food standards. The reduction in the high risk premises has been due to targeted advice and enforcement.

Table 1

The number of food businesses and their inspection rating for food hygiene (23/4/08)

Risk	Distributors	Importers 3 rd Countries	Suppliers of articles in contact with Food	Mfr selling by retail	Manufacturer	Packers	Restaur ants	Pub/Club	Supermar ket	Retailers	Slaughter houses	Grand Total
A				1	3		15					19
B	4			7	9		312	21	1	22		376
C	68			16	12	1	688	124	10	308		1227
D	12			1			47	69	3	143		275
E	9	1		1	1		36	36	2	171		257
No risk		9	4		1		2			5	2	23
Unrated	1	1		2	4		92	7	1	54		162

Total 2339 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 (23/4/08)

	Distributor	Importers 3 rd Countries	Sup of articles in contact with food	Manufacturer selling by retail	Manufact urers	Restaura nts	Packers	Supermarket	Pubs/Clubs	Retailers	Slaughter houses	Total
A	12	1			4		1			3		21
B	68	3		19	25	1	411	62	7	199	1	796
C	9	2	2	5	2	633		9	175	389	1	1227
No Risk	1	1	2			8				24		36
Unrated	5	4		4	5	139		1	20	88		266

Total premises 2346

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 2008 the following establishments were approved by the Council to produce and manufacturer food for the domestic market: -

- 18 fishery products establishments
- 1 wholesale fishery products and live shellfish market
- 5 meat products establishments
- 1 dairy products

- 2.4.4 Tower Hamlet's 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. Many 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.
- 2.4.6 With continual development and regeneration taking place in the borough, there is a continual 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.
- 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 2008/9 these inspections will be on a project basis. The projects will look at falls from height, machine guarding, young workers and gas safety
- 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.
- 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 will need to be reviewed in light of the Regulators Compliance Code, which replaced the Enforcement Concordat for our Service.

3.0 **Service Delivery**

3.1 Inspection Programmes

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. The criteria for this measure are a score of 10 points or below in the compliance of premises structure and hygiene laws and the confidence in management that the food business operator is in control of the hazards within their business, this means the introduction of a documented management system.

The FSA new code of practice that compliments the NI 184 permits surveillance/verification visits to be undertaken on those businesses that are deemed broadly compliant in the lower risk categories of C and D for food hygiene and non visits for those in category E

We will pilot a hazard spotting approach to those premises that are deemed to be broadly compliant. This will reduce burden on business and concentrate 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.

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.

We have determined that we have 57% of all food premises currently broadly compliant.

- 3.1.1 The Food Safety Officers carry out programmed food hygiene/standards inspections at frequencies determined by the FSA. 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 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 audit. 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.
- 3.1.2 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.
- 3.1.3 For 2008/9 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 2008/9.

Inspection Rating	Number of food hygiene inspections due
A	19 x 2 = 38
B	380
C Broadly compliant	561
C not Broadly compliant	264
D Broadly compliant	118
D not broadly compliant	6
E (verification)	6
Unrated	161
Total Inspections	855
Total Surveillance visits	679
Total Interventions	1534

Table 4

The number of food standards inspections due in 2008/9 and the inspection targets.

Inspection Rating	Number of food standards inspections due
A	21
B	406
C (verification)	22
Unrated	260
Total	709

- 3.1.4 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 rate by 5% to 63%.
- 3.1.5 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.
- 3.1.6 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.
- 3.1.7 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.
- 3.1.8 Food Standards revisits are of a lower priority and not required as often as for food hygiene.
- 3.1.9 The resource estimated for programmed inspections, including alternative enforcement strategies for lower risk premises is **4.0 Full Time Equivalent (FTE)**. Re inspections allocation to be **0.86 FTE** **Annexe A** gives details of the assessment of resources for all functions within the plan.

3.1.10 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.
- Health & Safety inspections will be on a themed basis.
- Closure and follow-up enforcement action, including prosecution of businesses as appropriate.
- We will specifically target A risk premises 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 2007/8 was 983, an 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.

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.

3.4.3 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 2008/9.

3.4.4 The resource required for this work is estimated to be **0.32 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 2008/09 is approximately 200 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 2007/08 was 256 of which 50 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 **0.8 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 2007/8 there were 146 Food 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.

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.
- Nutritional requirements of School meals

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. There is an allocation of approximately £220 per member of staff. However this is often supplemented from other parts of the departmental budget.
- 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 2008/09

EXPENDITURE	
Salaries	598,200
Employee Related Expenditure	8,000
Car Allowances	12,900
Parking Permits/Charges	600
Public Transport Costs	200
Equipment & Furniture	2,800
Materials , Samples & Testing	13,000
Clothing, Uniforms & Laundry	200
Office Expenses	1,600
External Services	5,700
Communication Costs	1,000
Miscellaneous Expenses	600
GROSS EXPENDITURE	644,800
INCOME	
Fees and Charges	(2,500)
Other Fees and Charges	(1,100)
GROSS INCOME	(3,600)
NET EXPENDITURE	641,200

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 2008/9 is prioritised as follows:-

Food Issues

Imported Food
Approved Products
Ethnic foods
Update Seminars

General Issues

Team Building
Legal Procedures
Equalities

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 2007/8. were allocated. The table also sets out the resources required to fulfil the plan for 2008/9 (**12.68 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 2007/8

4.4.4 The areas of work which were not completed were:

- Home Authority activity – no formal agreements were established.
- Programmed inspections were 99.6% of those planned for hygiene and 57.3% for standards. (excluding unrated)

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 2007/8 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 6.18.

6.4 Inspection Programmes

6.4.1 The monitoring for the FSA was only for the first three quarters of the year due to changes to the monitoring procedures. This section covers a report back for the full year. 99.6% of all food hygiene premises that were due for inspection had a food hygiene intervention (this figure excludes the unrateds as these are not included in this statistic to the FSA). 6 inspections were missed. However, this was made up from 1 B, 2 C, 3 D (34 unrated premises were also not visited). All overdue premises have been carried forward to the 2008/9 programme. This is an improvement on last year.

6.4.2 We carried out 643 revisits, this is an increase from the previous year.

6.4.3 57% of the food standards programme was carried out.

6.5 Enforcement

6.5.1 5 businesses or individuals were prosecuted as a result of either programmed inspections or complaint inspections. This resulted in total fines of £22,350 and costs awarded of £5,207. 14 Simple Cautions were issued on the traders at Billingsgate Market in a initiative to drive up compliance on Fish Labelling requirements.

6.5.2 180 formal improvement notices were issued and 2250 warning letters or hand written warnings were given to businesses throughout the year.

6.5.3 9 premises were closed by Emergency Prohibition Notices and 4 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.

6.7 Food Complaints/Requests for Service

6.7.1 A total of 983 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, 76 complaints alleged food poisoning due to eating out in Tower Hamlets. 17 complaints were about dirty premises, 78 about unhygienic practices, 88 about pest infestations 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

6.10.1 256 Food samples were taken in total of which there were 50 failures. These were subsequently followed up.

6.10.2 A full Sampling Plan has been produced for 2008/9 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 76 service requests alleged food poisoning originating from food consumed in the borough but no firm links were established.

6.12 Food Alerts

6.12.1 146 Food Alerts were received from the FSA, 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 2007/8 plan.

6.14 Food Safety Promotion

6.14.1 A local campaign took place before Christmas on how to prepare & cook turkey safely featuring a press article, published in East End Life.

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

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.
- 1 new staff was recruited.
- We have a number of enthusiastic newly qualified staff.
- A EHO post was deleted to fund the Food Safety Officers who qualified during the year

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

6.16.2 Quality Assessment

6.16.3 In house procedures have been reviewed in light of the new National Indicator and re-written.

6.16.4 Documented team meetings took place.

6.16.5 Monthly monitoring reports are now produced on a regular basis

6.17 Key areas for Improvement/Development

6.17.1 Further work must be carried out to achieve compliance with the approval of businesses located at Billingsgate Market.

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.

6.17.6 To implement the Regulators Compliance Code into our Enforcement Policy.

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 consider the impact of the Better Regulation Executive

7.0 Annexes

- Annexe A: Assessment of resources
- Annexe B: Trading Standards & Environmental Health (Commercial) Structure
- Annexe C: Current Council Administrative Structure
- Annexe D: Current Council Corporate Structure
- Annexe E: Food Safety Team Plan 2007/2008
- Annexe F: Food Sampling Policy 2007/2008

Annex A

Assessment of Resources

Resources for 2008/2009

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) = 688 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 2408 hours to inspect 100%.

Broadly compliant premises = 679 inspections due at 1.5 hours per inspection, therefore 1018 hours to inspect 100%.

Unrated premises to receive a full inspection 161 at 3.5 hours = 563.5

Total for inspections/surveillance therefore = 3989 hours (570 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 0.16 hrs per premises (549) for implementation of scheme = 98 hours

Allow 5% will require inspection, i.e. 30 premises at 1.5 hrs each = 45 hrs

Total for Alternative Enforcement Strategies = 143 hrs (20.5 days)

Food Standards Inspections A rated: 21 premises due for food standards only @ 2 ½ hrs each = 52.5 hrs (7.5 days)

Approved premises 53 approvals due @ 5 hours each = 265 hours (38 days)

Resource required to achieve 100% inspection rate = **4 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 = 19 @ 3.5hrs = 38 hrs (5.5 days)

Premises falling out of broadly compliant category 270@ 3.5 hours = 945 hours (135 days)

Resource required for re inspections = 140 days = **0.86 FTE**

Food standards inspections revisits 50 @ 2hrs = 100 hrs (14.28 days)

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

Service requests

It is expected that some 900 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 1350 hrs will be required to deal with these.

Total for Service Requests 1350 hours (193 days)

In addition:

98 Planning Applications @ 1 hr each = 98 hrs

Total time for Planning Applications = 98 hrs (14 days)

77 Premises Licence Applications @ 1 hr each = 77 hrs

Total time for Premises Licence Applications = 77 hrs (11 days)

146 food alerts @ 1 hr each = 146 hrs

10% approx will require extensive investigations etc. @ approx. 15 hrs each = 210 hrs

Total time for Food Alerts = 356 hrs (51 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 = 344 days = **2.2 FTE**

Home Authority Premises

There are approximately 290 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 @ 25 hrs = 75 hrs

Ad-hoc support & advice = 250 hrs

Business seminars = 35 hrs

Total for Business Advice & Support = 360 hrs (51.4 days) = **0.32 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 **0.8 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 100hrs (14.3 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 (47.57 days)

Imported Food Projects/Surveillance allow 140 hrs

Total for Imported Food Control = 140 hrs (20 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 5 closures @ up to 50 hrs each (inc of legal action) = 250 hrs

Total time for Closures = 250hrs (35.7 days)

Total for other activities = 147.57 days= **0.9 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 2008/9, 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

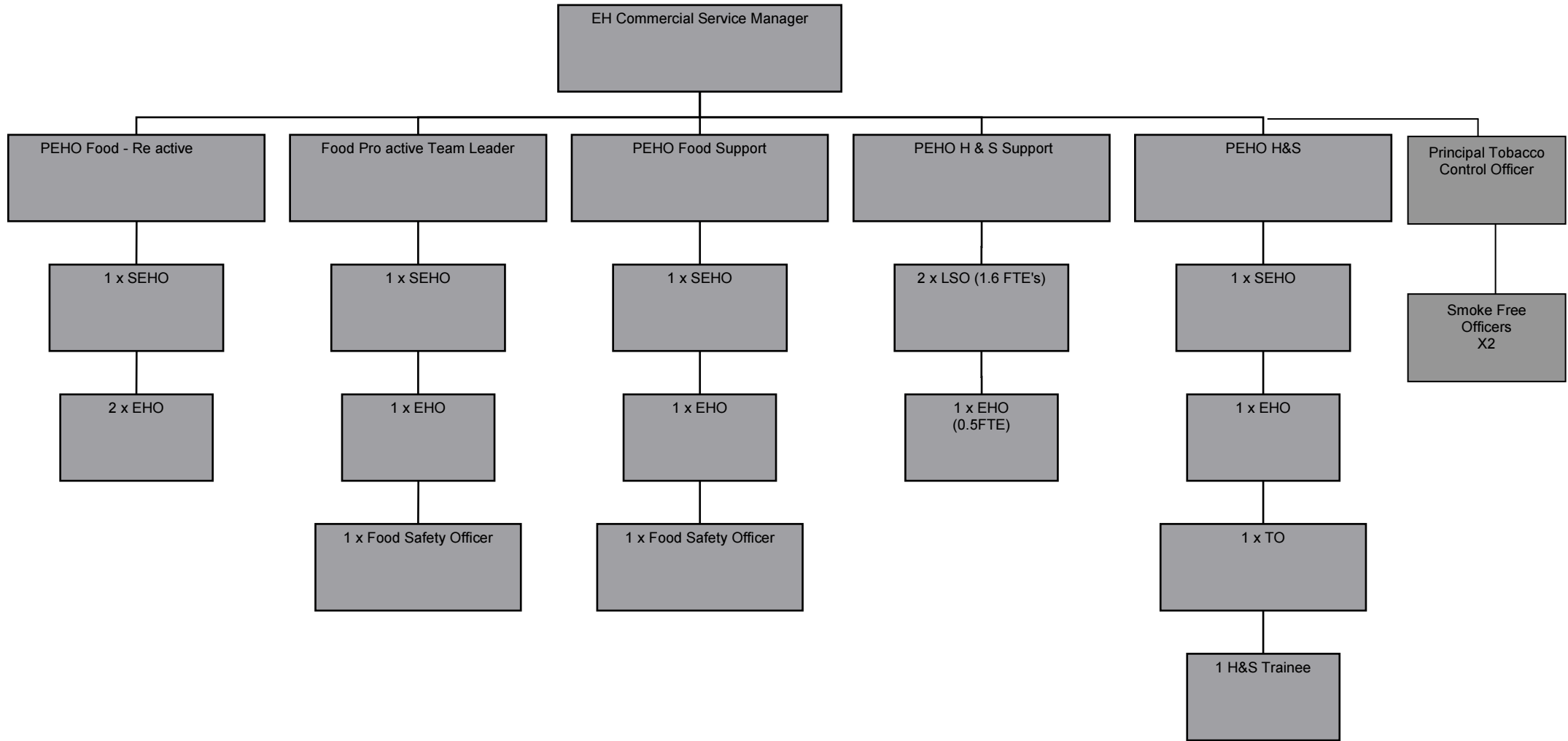
Activity	Time identified to complete work in Service Plan (2008/2009)	Time identified to complete work in Service Plan (2007/2008)
Programmed Inspections	4	4.9
Re-inspection	0.86	0.6
Re visits	0.1	nil
Service Requests	2.2	2
Home Authority	0.25	0.3
Advice to businesses	0.32	0.3
Food sampling	0.7	0.7
Liaison	0.2	0.2
Food Safety Promotion	0.6	0.6
Food Poisoning outbreaks	0.8	0.8
Other Activities	0.9	0.9
Management	1.25	1.25
Technical Officer Support	0.5	1.0

Total	12.68 (Actual available 12.5)	13.55 (Actual available 13.5)
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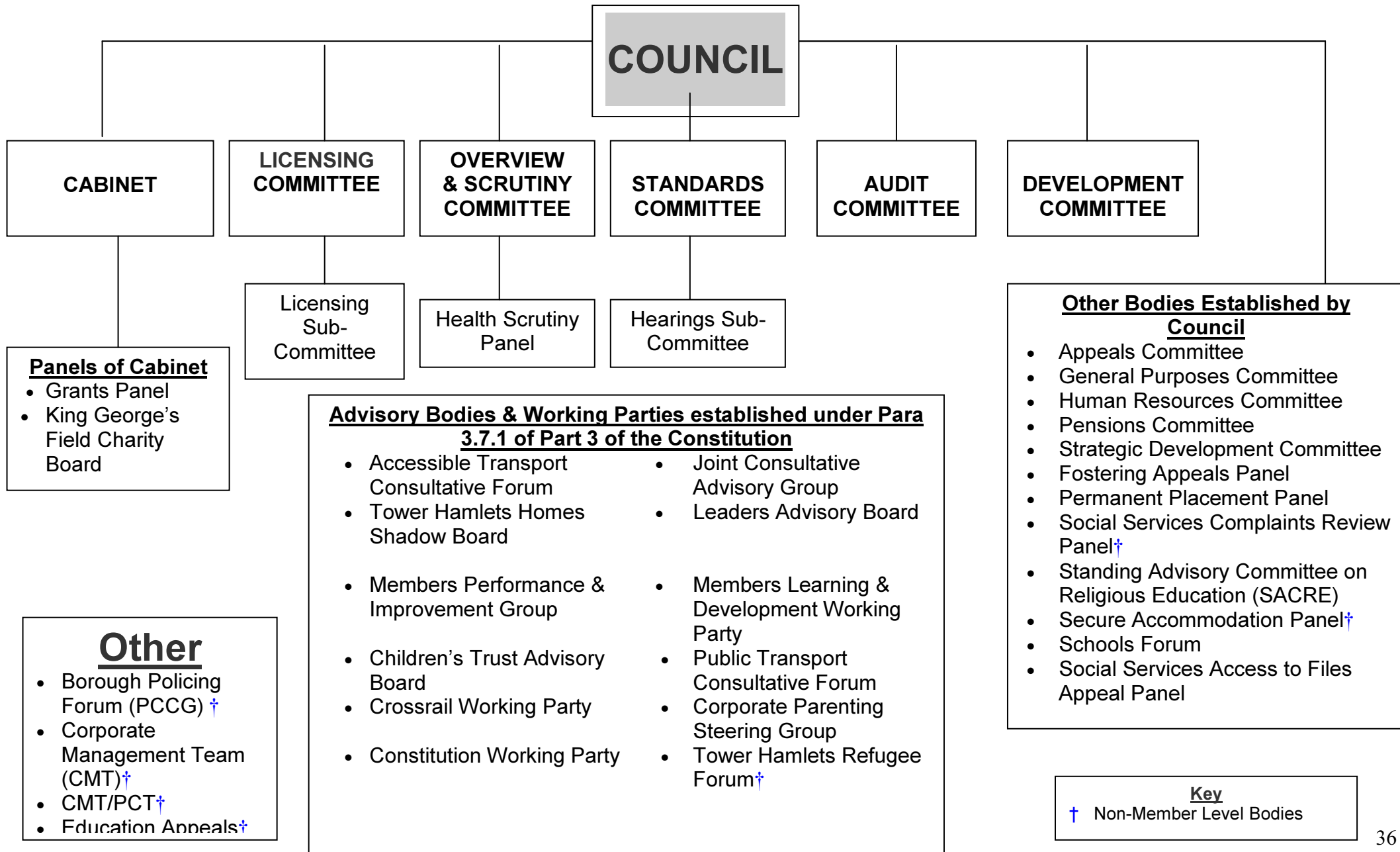
The shortfall identified is 0.18FTE should not prevent us from fulfilling the plan providing we can retain our current agency staff while we recruit. A member of staff will be on maternity leave throughout this year, hence we may have to reduce our proactive programme in order to concentrate on the national performance indicators and the performance that is expected by the FSA.

We also deleted a post from the structure to enable the conversion of the trainee technical officers to Food Safety Officers as they had passed their final examinations in order inspect premises for food hygiene. As agreed in our restructuring programme in 2005/06.

Annex B: Environmental Health Commercial Structure



Annex C: TOWER HAMLETS DECISION MAKING STRUCTURE



Panels of Cabinet

- Grants Panel
- King George's Field Charity Board

Advisory Bodies & Working Parties established under Para 3.7.1 of Part 3 of the Constitution

- Accessible Transport Consultative Forum
- Tower Hamlets Homes Shadow Board
- Members Performance & Improvement Group
- Children's Trust Advisory Board
- Crossrail Working Party
- Constitution Working Party
- Joint Consultative Advisory Group
- Leaders Advisory Board
- Members Learning & Development Working Party
- Public Transport Consultative Forum
- Corporate Parenting Steering Group
- Tower Hamlets Refugee Forum †

Other Bodies Established by Council

- Appeals Committee
- General Purposes Committee
- Human Resources Committee
- Pensions Committee
- Strategic Development Committee
- Fostering Appeals Panel
- Permanent Placement Panel
- Social Services Complaints Review Panel †
- Standing Advisory Committee on Religious Education (SACRE)
- Secure Accommodation Panel †
- Schools Forum
- Social Services Access to Files Appeal Panel

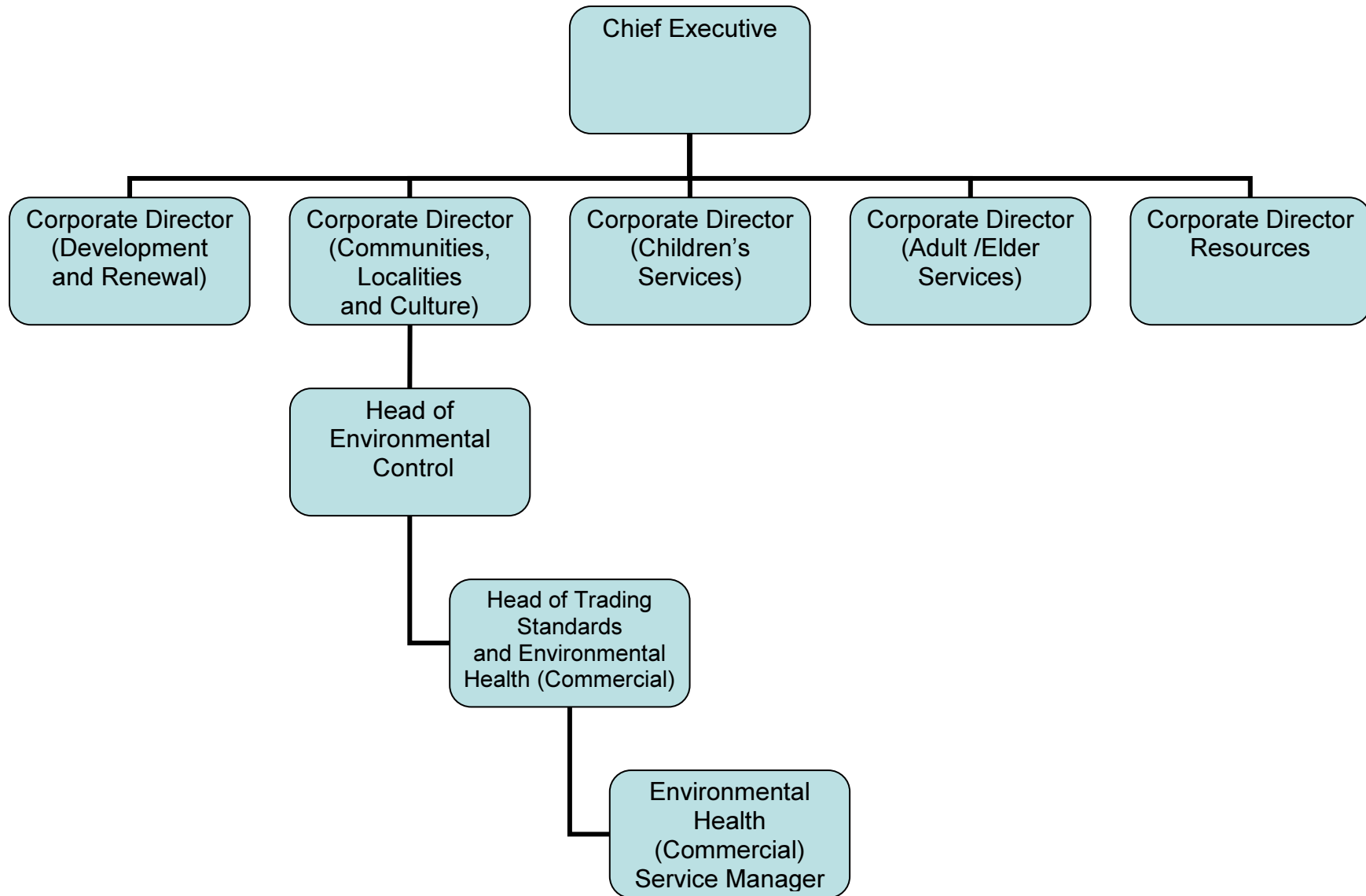
Other

- Borough Policing Forum (PCCG) †
- Corporate Management Team (CMT) †
- CMT/PCT †
- Education Appeals †

Key

† Non-Member Level Bodies

Annex D - LB Tower Hamlets – Top Level Structure



Annex E

Environmental Health Commercial Team Plan 2008/2009

Including:

- Food Safety**
- Health and Safety**
- Infectious Disease**
- Environmental Health Licensing**

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 calendar year 2008. 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 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 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 Commission (HSC): To meet specified levels and standards of service as laid down by the HSC 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 HELA Strategic Plan and identify local priorities. Undertake agreed project/priority inspections as agreed with the 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"> 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.
<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 is 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 liases with other authorities as part of the London Food Co-ordinating Group (Northeast Sector Liaison Group). The service also liases 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; assist with the determination of Occasional Public Entertainment Licences, improving the 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	Action & Target	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 2008. Programme of inspections to be produced quarterly. Up to 579 inspections (Categories A-B and unrated) to be carried. Includes 6 inspections carried over from 2007/8 and 161 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 679 premises C-D rated premises that are not broadly compliant will have a full inspection. This equates to 270 premises Alternative Enforcement Strategies will be carried out for 109 E rated premises. Officers to complete 15 programmed inspections pro-rata per month, subject to other allocated responsibilities. Inspection capacity from current staff 1092 Promote SFBB during inspections Premises to be risk rated when investigating a Service Request 	DT, SEW, FB, ID, AK, EV, BMI, HC, RZ, JOS
<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. 	DT, SEW, FB, ID, AK, EV, BMI, HC, RZ, JOS
Food Standards		
<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 	<ul style="list-style-type: none"> Annual inspection programme to be produced during 1st week April 2008. Programme of inspections to be produced quarterly. 	DT, SEW, FB, ID, AK, EV, BMI, HC, RZ, JOS

<p>departmental policies and procedures, Codes of Practice, Food Standards Agency and LACORS guidance.</p>	<ul style="list-style-type: none"> • Up to 687 inspections (Categories A – B and Un-rated) to be carried out by team. Includes approximately 395 inspections carried over from 2007/8 and 260 un-rated premises at beginning of year. • Officers to complete programmed inspections as allocated each period. Where food hygiene and food standards are both due during the financial year, inspections will be carried out at the same time. • 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. 	
<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. • Revisited premises will not be risk rated again as per the guidance in the FSA code of practice. 	<p>DT, SEW, FB, ID, AK, EV, BMI, HC, RZ, JOS</p>
<p>Alternative Enforcement Strategies</p>		
<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 2008/9. • Approximately 5% of AES premises to require an inspection. 6 inspections for Food Hygiene and 22 for Food Standards. • Unreturned questionnaires to be followed up by Food Safety Officer's 	<p>DT, SEW, FB, ID, AK, EV, BMI, HC, RZ, JOS</p>
<p>Illegal Food Investigations</p>		

<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. <ul style="list-style-type: none"> To build in a project specifically looking for illegal imported foods. Based on products of animal origin. This project will seek to link in with a North East London programme of work. 	DT, SEW, FB, ID, AK, EV, BMI, HC, 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 procedures, Codes of Practice and HSE/HELA guidance. 	<ul style="list-style-type: none"> Joint inspections to be carried out with regards to Warehouse Safety in June – August. Staff to attend awareness seminars and undertake projects on health and safety issues in relation to: <ul style="list-style-type: none"> Ladders Gas Safety Plant and Equipment in Food premises Young Workers Migrant Workers 	DT, SEW, FB, ID, AK, EV, BMI, HC, RZ, JOS
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. 	DT, SEW, FB, ID, AK, EV, BMI, HC, 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. <ul style="list-style-type: none"> 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. 561 premises The private Markets will be reviewed with regards to facilities provided to traders. 	DT, SEW, FB, ID, AK, EV, BMI, HC, 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 approval. • Approve or conditionally approve all businesses within the market. • Approval or enforcement within 6 months of issuing schedules. 	SEW Lead DT, SEW, FB, ID, AK, EV, BMI, HC, RZ, JOS
<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. • Examine the necessity of approval for fish importers and wholesalers and progress if appropriate. 	DT, SEW, FB, ID, AK, EV, RW, BM,
<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"> • Devise inspection programme for approved establishments in line with their risk rating. 	DT, SEW, FB, ID, AK, EV, BMI, HC, 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. 	SEW
Food Sampling		
<ul style="list-style-type: none"> • Publish and follow sampling programme for 2008/2009. 	<ul style="list-style-type: none"> • Publish April 2008. 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. 	FB FB FB FB DT, SEW, FB, ID, AK, EV, BMI, HC, RZ,

		JOS
<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.	DT, SEW, FB, ID, AK, EV, BMI, HC, RZ, JOS
<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 	SEW, FB
<ul style="list-style-type: none"> Case reviews. 	<ul style="list-style-type: none"> Random cases reviewed by PEHO at 121's. 	SEW, FB,
<ul style="list-style-type: none"> Customer Care. 	<ul style="list-style-type: none"> Letter to complainant after 3 months updating on progress. Letter to complainant informing outcome on completion of case. 	DT, SEW, FB, ID, AK, EV, BMI, HC, 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, SEW, FB, ID, AK, EV, BMI, HC, 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, SEW, FB, ID, AK, EV, BMI, HC, 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, SEW, FB, ID, AK, EV, BMI, HC, 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. 	DT, SEW, FB, ID, AK, EV, BMI, HC, 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 – provide advice within 2 weeks.	DT, SEW, FB, ID, AK, EV, BMI, HC, 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. 	SEW, FB Admin
Health Certificates		
<ul style="list-style-type: none"> Respond to all Health Certificate Requests in accordance with documented procedures. 	<ul style="list-style-type: none"> Direct allocation to PEHO -incoming workload checked daily. Certificate or other response produced within 5 days. 	DT, SEW, FB, ID, AK, EV, BMI, HC, 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, SEW, FB, ID, AK, EV, BMI, HC, 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 7 days or as specified by consultee. Visit premises and object where necessary. 	DT, SEW, FB, ID, AK, EV, BMI, HC, 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 and rated within 28 days of receipt of Registration Form. Report to be run to identify these premises 	DT, SEW, FB, ID, AK, EV, BMI, HC, 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. 	DT, SEW, FB, ID, AK, EV, BMI, HC, 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 correspondence 	DT, SEW, FB, ID, AK, EV, BMI, HC, 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 2008. Deliver initiative June 2008. Interactive display. Commence development of programme for 2009 in Jan/Feb 2009. 	BMI
<ul style="list-style-type: none"> Miscellaneous Food Safety Promotion Activities. 	<ul style="list-style-type: none"> Examine opportunities to participate in appropriate 	BMI

	<p>schemes, deliver talks, publish information and provide displays for suitable groups or at events or locations throughout the year.</p> <ul style="list-style-type: none"> • Deliver education in accordance with above as appropriate. • Delivery of an Allergens awareness seminar to caterers. 	
Inter-Departmental Liaison		
<ul style="list-style-type: none"> • Lead officers to liaise with other services. 	<ul style="list-style-type: none"> • Education meetings, • Social Services • Provide advice on appropriate policies and procedures to Education and Social Services with regard to their responsibilities under food safety legislation. 	<p>} Regular liaison at least 1 per year</p> <p>FB, SEW, ID</p>
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"> • Reference Encyclopaedias. 	<ul style="list-style-type: none"> • Update all Encyclopaedias within 2 weeks of 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,JOS
<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. 	RZ,JOS
<ul style="list-style-type: none"> • Ensure adequate stocks of consumables (bags, 	<ul style="list-style-type: none"> • Check stock every month and make appropriate orders. 	RZ,JS

seals etc).		
<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. 	RZ, 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 2008/2009 and submit to Members (Cabinet). June 2008. • Produce Service Plan for 2009/2010 in accordance with Food Standards Agency requirements. Commence March/April 2009. • 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 CP DT DT, AH DT, CP
Staff Competencies/Training		
<ul style="list-style-type: none"> • All Environmental Health Officers eligible for submission to the CIEH Assessment of Professional Competence (APC) to undertake the assessment. 	<ul style="list-style-type: none"> • Relevant EHO’s who are Corporate Members currently without APD are encouraged to submit for assessment during the year. 	SEW, FB
<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. 	SEW, FB
<ul style="list-style-type: none"> • Identify appropriate training needs of staff and seek to provide appropriate training to meet Code of Practice, departmental and CPD requirements. 	<ul style="list-style-type: none"> • Staff to attend appropriate update-training, courses, and seminars as available subject to budgetary constraints. 	DT, SEW, FB, ID, AK, EV, BMI, HC, 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 	Admin, AH DT, SEW, FB

	database.	
Departmental Operations		
<ul style="list-style-type: none"> Continually review methods of working and operational activities to seek to identify further efficiencies in provision of services. 	<ul style="list-style-type: none"> Assess identified improvements to service and implement as appropriate 	DT, SEW, FB

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 	CAS, SEW RDW, WS, SM, FE, AMA, KMO, DFH, DT
<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. Truman's 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. 	SEW, DFH, 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 an application. 	<ul style="list-style-type: none"> With regards to TENS information to be provided to applicant prior to the event. Review applications as they are presented. Attend all relevant meetings with the applicant 	SEW,DFH, KMO
<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 	CAS, SEW, RDW, WS, SM, FE,

	EHCSM.	
<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 783 primary inspections, including a total of 100 MST, Pet Shop Licences to be undertaken by the Team as per resources on 1/4/08. Individual monthly targets CAS 0 SEW – 8, RDW - 10, FE-14, WS – 14, SM - 7, DFH – 13, KMO - 7 AMA -10 . Including MST, launderettes, Pet Shop and event inspections. 8.2% of commercial premises will be inspected by the Unit. Undertake relevant re-inspections in line with the Inspection Protocol – where necessary 	CS, SEW, WS, SM, FE, AMA, KMO, DFH,
<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. 	
<ul style="list-style-type: none"> To target Entertainment Venues where Control of Noise at Work Regulations 2005 may be an issue. 	<ul style="list-style-type: none"> Health and Safety inspections to be undertaken to gauge the level of compliance and specifically the Noise at Work Regulations 2005. To raise awareness and take action where employees are at risk. 	DFH, KMO
<ul style="list-style-type: none"> To be involved with the Ladders Exchange campaign run by the HSE in September and October 2008 	<ul style="list-style-type: none"> Carry our relevant visits to duty holders with regards to working from ladders. Establishing compliance to the Working at Height Regulations Carry out evaluation inspections from premises inspected in the project from 2007/08 	CAS, SEW, RDW, WS, SM, FE, AMA, DFH, KMO
<ul style="list-style-type: none"> To carry out work with the LFEPA during the run up to Christmas to give guidance to retailers on maintaining fire routes and overstocking. 	<ul style="list-style-type: none"> Unannounced visits, some with officers from the LFEPA 	DFH, KMO
<ul style="list-style-type: none"> To raise awareness on Workplace Transport – especially in Builders Merchants and other relevant premises. Working in partnership with the North East Sector, HSE on the London wide Projects of 	<ul style="list-style-type: none"> Devise a project to review and establish control measures for duty holders on issues relating to Builders Merchants and other relevant premises. Asbestos Campaign in last quarter – maintenance workers To concentrate on issues in relation to Moving Goods Safely. 	CAS, SEW, RDW, WS, SM, FE, AMA, Possible project on violence depending

moving goods safely. Target Company Castle Timber.	This will concentrate on Castle Timber Ltd. To be the lead on this project for North East London	on the HSE toolkit
<ul style="list-style-type: none"> To carry out awareness raising on safety issues with the Food Officers. 	<ul style="list-style-type: none"> Awareness seminars to be undertaken on the following subjects. <ul style="list-style-type: none"> Gas Safety in Food premises Delivery Hatches Machine Safety 	DT, CAS, SEW, RDW
<ul style="list-style-type: none"> To carry out inspections in relation to Warehouse and Wholesale Safety. To raise awareness during these visits on the FIT 3 areas. 	<ul style="list-style-type: none"> To target Warehouses and Wholesale premises to consider Fork Lift Trucks, Racking use, Falls from Height. The work to be co-ordinated with Food Safety Officers. 	CAS, SEW, RDW, WS, SM, FE, AMA, Food Safety Officers
<ul style="list-style-type: none"> To investigate the level of compliance within tyre fitting establishments. 	<ul style="list-style-type: none"> To inspect tyre fitting establishments and carry out compliance strategies in relation to the set protocol. 	RDW, WS
<ul style="list-style-type: none"> To work in partnership with the Trading Standards Service on the storage of Fireworks 	<ul style="list-style-type: none"> To undertake joint visits and a programme on independent visits in relation to the storage of fireworks. Engagement of local Fire Safety Officers. 	DFH, KMO
<ul style="list-style-type: none"> Legionella Control 	<ul style="list-style-type: none"> To audit and inspect high risk Cooling Towers To audit domestic water supply in Offices To audit and inspect spa's 	CAS, SEW, RDW, WS, SM, FE, AMA,
<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"> Migrant Workers 	<ul style="list-style-type: none"> To investigate the benefits of becoming involved in the TUC Migrant Workers programme. To make referrals where possible. 	DT
<ul style="list-style-type: none"> Young Workers 	<ul style="list-style-type: none"> To gather relevant data on young workers and make referrals to the Education Service. 	CAS, SEW, RDW, WS, SM, FE, AMA, DFH, KMO
<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 	CAS, SEW, RDW, WS, SM, FE, AMA, DFH, KMO
<ul style="list-style-type: none"> Undertake environmental sampling: 	<ul style="list-style-type: none"> To develop sampling protocols and to undertake sampling and 	CAS, SEW, RDW,

<ul style="list-style-type: none"> • Spa water • Wax pots • Dyes used in semi permanent make, tattoos and henna 	publish the results. Work with other enforcers where required.	WS, SM, FE, AMA,
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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 languages are forwarded to SME's. 	<ul style="list-style-type: none"> • An information pack to be sent to all SME after auditing. Target: All audited premises 	CAS, SEW, RDW, WS, SM, FE, AMA, DFH, KMO
<ul style="list-style-type: none"> • European Health and Safety Week October 2008 	<ul style="list-style-type: none"> • Take part and publicise the European Health and Safety in October – MSD's and risk assessment 	

Customer Care

<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 	CAS, SEW, RDW, WS, SM, FE, AMA, DFH, 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. 	CAS, SEW, RDW, WS, SM, FE, AMA, DFH, 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. 	CAS, DHI, RDW, WS, SM, FE, AMA, DFH, KMO

Intermediary

<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 	CAS, SEW, RDW, WS, SM, FE, AMA, DFH, KMO
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<u>Licensing</u>		
<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 <p>Target: All Licences</p>	CAS, SEW, RDW, WS, SM, FE, AMA, DFH, 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 	SEW, FE, 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.	CAS, SEW, RDW, WS, SM, FE, AMA, DFH, 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 CAS, SEW, RDW, WS, SM, FE, AMA, 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>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 polices 	<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 	<ul style="list-style-type: none"> To assist with the review and provide relevant hard data as 	DT, AMA

surveillance scheme.	requested.	
<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

Environmental Health Commercial

SWOT

<p>Strengths</p> <ul style="list-style-type: none"> New staff joining Procedures in place Good Team morale, diverse skills Integration of Food and Health and Safety Team management Training of one student Environmental Health Officers Project work – highlighting real risks and addressing them (Fit 3) Developing partnerships Structure allows career progression Structured system for receiving customer feedback Structured sampling programmes with other Local Authorities 	<p>Weaknesses</p> <ul style="list-style-type: none"> Formal adoption Enforcement Policy needed. Expanding workload as the Borough develops Reliance on contractors, loss on local intelligence Potential difficulties in dealing with major reactive issues Three vacant posts Training needs for staff Website requires constant updating
<p>Opportunities</p> <ul style="list-style-type: none"> Flexible Warranting Health and Wellbeing Agenda Review of FSA policies with regards to Local Authorities Substantial part of the Borough under regeneration Development of Flare – linking documents and MST Licensing Scores on the Doors Olympics Joint Work Development of the process to ensure consistency across the whole service New Animal welfare legislation Stronger HPA, more focussed on Local Authorities as partners HSE to focus on Local Authorities as partners Review of section 18 guidance Joint PCT Team on Smoke Free Public Places Provision of Science and Technology funding from HSE 	<p>Threats</p> <ul style="list-style-type: none"> More legal responsibility, more regeneration, ability to be flexible with resources Ability of a 'situation' to affect programmed work Market shortage of Environmental Health Practitioners

Action Points from Swot		
Issues that needs to be addressed	Define Action and Target	Responsibility
<ul style="list-style-type: none"> • Implementation of Smoke Free Team and Strategy (H) • Statutory Code of Practice for Regulators 	<ul style="list-style-type: none"> • Work with external partners to secure funding • Assess impact 	DT, CP, DT, CP
<ul style="list-style-type: none"> • Formal adoption of joint Enforcement Policy (H) 	<ul style="list-style-type: none"> • Identify the route of adoption Obtain formal adoption of policy 	DT , CP
<ul style="list-style-type: none"> • Be aware of current reviews of the legislation that the Service enforces. (M) 	<ul style="list-style-type: none"> • Have representation at the Liaison Groups and Working Parties. Four meetings of each per year. • Assess impact of new legislation and the effects on the Service. 	DT
<ul style="list-style-type: none"> • Review of Officer performance ensuring service standards are met (L) 	<ul style="list-style-type: none"> • Undertake verification audits of staff – embedded for FS roll out to HS • Regular review programmes of staff performance 	PEHO
<ul style="list-style-type: none"> • Develop IT infrastructure (M). 	<ul style="list-style-type: none"> • To investigate the further capabilities of Flare with regards to linking documents. 	DT, SR, AH
<ul style="list-style-type: none"> • Threats to the work plan (M) 	<ul style="list-style-type: none"> • Deal with unforeseen emergencies and determine effect on work plan accordingly. 	DT
<ul style="list-style-type: none"> • Scores on the Doors (M) 	<ul style="list-style-type: none"> • Seek political and Senior management buy in 	DT, CP
<ul style="list-style-type: none"> • Engage Health and Safety EHO's and the interest in Food work (M) 	<ul style="list-style-type: none"> • Potential training implications for EHO's 	DT. PEHO
<ul style="list-style-type: none"> • Engage with Health Strategies – PCT/HPA (H) • Progress joint working with HSE, FSA and NE Sector (H) 	<ul style="list-style-type: none"> • Involvement with PCT, LAPs, LAA and CPAG's as the opportunity arises. • Involvement with FSA, HSE, LA's 	DT, PEHO
<ul style="list-style-type: none"> • Reduce reliance on contractors (L) 	<ul style="list-style-type: none"> • Promote the R&R package when delivered 	DT, CP
<ul style="list-style-type: none"> • Review and update website (L) 	<ul style="list-style-type: none"> • Units to review 	DT, PEHO
<ul style="list-style-type: none"> • Evaluate customer feedback consultations (H) 	<ul style="list-style-type: none"> • Respond to and act on customer feedback 	DT
<ul style="list-style-type: none"> • Consider the implications of further role for HS Unit (M) 	<ul style="list-style-type: none"> • Explore the possibility of agreeing to flexible warranting for a more cohesive service to the public. 	DT, CP, PEHO
<ul style="list-style-type: none"> • Development of Joint Olympics Teams (H) 	<ul style="list-style-type: none"> • Working with and outside TH 	DT CP

• Develop FSA reporting mechanisms (H)	• To assess impact and set up	DT, CP
• Engage with the HSE and develop the FIT 3 agenda (H)	• Work with other Authorities and the HSE	DT
• Develop Team to blur edges (H)	• PEHO and joint planning	DT, PEHO

Annex F

LONDON BOROUGH OF TOWER HAMLETS

FOOD SAMPLING POLICY 2008/09

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.