Environmental Health

and

Trading Standards Service

FOOD LAW ENFORCEMENT SERVICE PLAN

2013-2014
Foreword

St. Helens Council consistently recognises the importance that the provision of effective Environmental Health and Trading Standards services play in ensuring the safety and wellbeing of those who live and visit the borough.

The Food Law Enforcement Service Plan is an annual plan which is required to be endorsed by the Council, it seeks to provide a clear strategy and ensures that resources are targeted towards front line services and high risk activities. It also provides the basis for a robust regime to monitor the performance of service in the long term as well as short term.

The plan sets out the standard of performance that must be achieved by both services in order to maintain high quality health protection. The plan seeks to successfully balance service delivery between education, encouragement and enforcement. Assisting business to comply with the requirements of both food safety and food standards legislation is as important as detecting non-compliance.

National and local priorities are covered within the plan and through the delivery of work streams, which focus on these priorities, we aim to ensure the highest standards of health protection are provided to both the local and wider community.

Councillor Seve Gomez - Aspron, Cabinet Member for Environment & Neighbourhoods

June 2013
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As part of the Food Standards Agency’s Framework Agreement, Local Authorities are required to have in place Food Service Plans, which are audited by them. This service plan sets out how the nationally recognised priorities are addressed and delivered locally and the means by which these will be achieved. It details the achievements of the Food Service in 2012/13 and plans for 2013/14.

During 2012/13, the service undertook around 1650 visits to food businesses. Support provided during these visits is vital to businesses that face competing pressures in the current financial climate. Officers make sure that food businesses are aware of their legal obligations and help them ensure that the food they supply is wholesome and safe.

At the end of 2012/13, the base line figure for businesses being ‘broadly compliant’ with food safety legislation was 85%; this has risen from 77% in 2009/10. This improvement in compliance is a measure of distinct outputs of the activities undertaken by the Food Safety team in comparison to inputs, such as number of inspections undertaken. It demonstrates that the work done by the team has been effective and work continues to be done to target resources towards the less compliant businesses. As an example, a series of workshops with caterers, that did not have the legally required food safety management systems in place, were undertaken, followed by stepped enforcement, as required. The workshops were well received by the businesses.

The National Food Hygiene Rating Scheme was launched in February 2012 migrating from a local ‘Scores on the Doors’ star-rating scheme to the national numerical rating scheme. Members of the public can access food hygiene ratings at www.food.gov.uk/ratings and can see the ratings displayed at businesses.

The reforms to the way in which Public Health is managed and delivered provides an opportunity to increase our contribution to the public health agenda. What we eat can make a significant difference to our health. Work around nutrition can help in reducing the health inequalities that exist within St Helens. Environmental Health and Trading Standards services are well positioned to engage and influence food businesses in relation to nutrition and healthy lifestyles. We have already done this in salt reduction and improvement of the nutritional content of foods served in nurseries, which has been received well by local businesses. We will be undertaking further project work around diet and nutrition during 2013/14.

We will also be completing a number of projects looking at the composition of food and its labelling. This work is intended to reduce consumer detriment through failure to present food in an honest manner. We will also continue to assist our manufacturing business implement major changes to their food labelling, which are introduced over the next two years through the implementation of the European Food Information Regulations.
1.0 **Service Aims and Objectives**

1.1 **Aims**

The aim of the service is “To offer services which aim to contribute to the wider protection of the environment and strive to achieve fair and safe trading for the residents of and visitors to St. Helens”

**Objectives**

i) To prevent illness resulting from food and waterborne diseases.

ii) To assist consumers in achieving a healthy diet by avoidance of; contaminated, adulterated or poor quality food.

iii) To ensure consumers have access to accurate, understandable information to make informed choices.

iv) To assist businesses, in particular caterers to provide healthy catering options to help their customers to make healthier choices to assist in part to reduce obesity and heart disease within St Helens.

v) To protect business from economic disadvantage caused by competitors not complying with Food Safety and Food Standards legislation.

vi) To help business find the most effective way of complying with Food Safety and Food Standards legislation and to facilitate access to appropriate training.

vii) To work with other local authorities and agencies with common objectives to provide effective and “joined up” enforcement.

viii) To work within pre-set budgets and maximise all opportunities for income generation.

1.2 **Links to corporate objectives and plans**

The Council approves the Food Law Enforcement Service plan annually. The Cabinet Member holding the Portfolio for Environmental and Neighbourhoods monitors progress against service objectives during the year.

The work of the Food Service is reflected in the Council’s Performance Plan.

The Food Service Plan is reviewed annually taking into account corporate objectives demands on the service and any changes to the way in which the service is provided, to ensure the provision of the most cost affective service. The links to the St Helens Plan objectives are set out in Appendix 1 and Service Plans in Appendix 2.
2.0 Background

2.1 Profile of the Local Authority

The Borough of St. Helens comprises the town itself and smaller settlements such as Haydock, Newton-le-Willows and Billinge and is situated roughly 12 miles from Liverpool City centre and 25 miles from the centre of Manchester. It enjoys a strategic position at the heart of the regional road network with good linkages to the national rail network.

St. Helens is a relatively modern town. Its historical growth was based primarily on coal, which acted as a catalyst for the expansion of a range of industries including glass, chemicals and pharmaceuticals. Coal mining and glass manufacture between them once employed around 50,000 people, well over half the workforce. The decline in these key sectors led to the loss of over 20,000 jobs in the final quarter of the last century.

The continued regeneration of the local economy and infrastructure is an ongoing priority for the council and its partners. St. Helens has undergone considerable positive change in recent years. New businesses have set up in the area, taking advantage of the central location and a hardworking committed workforce and a warm welcome from the Council. Physically, post-industrial landscapes are being transformed and new greenways and woodland created. Major Town Centre improvements have added a host of new visitor facilities and attractions.

The 2011 Census has identified that the St Helens resident population now stands at 175,308. The age structure of the Borough broadly mirrors the national trend. The number of young people (aged 0-15 years) has decreased in recent years. Demographic change is one of the most pressing challenges facing St. Helens. As life expectancy improves and people live longer the number of people aged 65 and over continues to grow, increasing pressure upon local services. Non-white ethnic groups are estimated to be 3% of the population this is significantly lower than the North West and England averages. St Helens is subject to very low levels of population churn with one of the lowest rates of migration in the country. Although the largest group of migrant workers to St. Helens remains principally people from Eastern Accession States.

Overall unemployment in St Helens remains above the North West and National average although the rate of male unemployment is lower than the national average. The percentage of Young People not in employment, education or training is 8%, slightly above the north west average. The number of unemployed women and young people has increased significantly since 2009.

St Helens, as a district, experiences some of the poorest health. Improvements are slowly becoming evident, significant health inequalities still exist across the Borough. Life expectancy for both men and women is continuing to rise steadily, but St Helens still lags behind the England average

Within St Helens life expectancy is improving for both males and females. There is a significant variation in life expectancy based on deprivation with an 11.5 year difference for males between the most and least deprived and a 8.4 year gap between females. Circulatory diseases and cancers are the biggest killers in
St Helens and are within the top 10 causes of hospital admissions. Respiratory diseases are the third biggest killer. Pneumonia, COPD and asthma are some of the most significant causes of hospital admissions. In the UK obesity rates have doubled over the past 25 years, in St Helens data from the Health Survey for England indicates that local obesity rates affect around a quarter of the adult population and this has remained static in the past 2 surveys. These rates are slightly higher than the North West and England obesity levels.

In St Helens 10.1% of children weighed in reception class in school (age 4-5) were classified as obese compared with 9.4% nationally (2010/11). Although higher than national rates, age 4 to 5 year old rates are not significantly high and there has been a decrease in each cohort since 2006/07. By the time young people have reached year 6 (age 10-11) the percentage obese has increased to 21.9% compared with 19% nationally.

2.2 Organisational Structure

Organisational structure charts for Environmental Health and Trading Standards are as attached at Appendix 3.

2.3 Scope of the Food Service

In accordance with the standards set out in the Food Standards Agency Code of Practice and the Food Standards Agency Framework Agreement.

The Environmental Health Section is responsible for:

The enforcement of food safety legislation within all food premises within the borough using a range of interventions such as inspections and audits;

The investigation and enforcement where necessary of food complaints, including contamination by micro organisms, chemical contamination and contamination by mould or foreign matter of food products made or purchased in the borough;

The investigation of notifications of food-borne and water borne diseases, outbreaks of gastro-enteritis, including food poisoning outbreaks, in accordance with the Health Protection Agency, Cheshire and Merseyside Communicable Disease Operational Procedures;

Sampling of food produced or sold in the borough;

Provision of Food Hygiene and Nutrition Training;

Registration of food premises;

Approval of food premises under EC Regulations;

Health promotional activities around food and nutrition within the community and food businesses.

The Environmental Health Section is also responsible for the enforcement of the Health and Safety at Work Act and Smoke Free legislation. The frequency of health
and safety inspections is dictated by separate guidance and whenever possible they are carried out at the same time as the food safety inspections in food businesses.

The Trading Standards Section is responsible for:

All Food Standards work such as labelling and compositional matters.

This work is undertaken through the use of a range of inspections and interventions, investigation of complaints, sampling and focused proactive work, such as projects. Trader and consumer education are also provided whenever possible.

The registration and inspection of feed businesses and primary producers.

The Trading Standards Section is also responsible for the enforcement of legislation relating to Weights and Measures, Consumer Protection Regulations, Product Safety and Fair Trading and this is combined with food and feed work whenever possible.

The service is committed to helping business to comply with legal requirements in respect of food legislation, providing advice, guidance and assistance to ensure compliance, and including establishment and operation of a Home or Primary Authority agreement where appropriate.

2.4 Demands on the Food Service

Food service work profiles in respect of number and type of food premises in the borough requiring interventions in 2013/14 for Food Standards and Food Hygiene are attached in Appendix 4.

Service delivery is available from the office base at Wesley House, between the hours of 8.45 am and 5.15 pm, during the normal working week. However, food hygiene and standards inspections may necessitate out of hours visits, due to the nature of trading of relevant businesses and therefore, enquiries are frequently taken outside of normal business hours. Other out of hours services are available as circumstances dictate.

2.5 Food businesses and the local economy

Food production, its transport and sale at retail and catering establishments are very significant parts of the economy both nationally and locally. Nationally the food and drink supply chain accounts for 7% of GDP and employs 3.7 million people in everything from food retailing, to restaurants and canteens, to farming and fishing. The service sector, including hotels, distribution and catering remains the largest industry within St Helens.

Whilst national returns and local food business registrations indicate there has been a slight decrease in the numbers of food businesses in 2011/12, there was a notable increase in business turnover and new business registrations in St Helens during that year, and whilst there have been business closures, the number of food business registrations remained largely static in 2012/13, with 1370 food businesses registered at present.
Our work helps the changing local food economy to remain vibrant and enables the Council to provide practical support to businesses, particularly important in difficult economic times. The work of the food service helps maintain public confidence in the standards of our local food industry.

We work to help businesses comply with food legislation, which helps ensure fair competition and allow well-run food businesses to flourish and contribute to the local economy. We offer specific support for new companies, which can prove vital to the longer-term survival of a business.

2.6 Health Inequalities

The Environmental Health and Trading Standards services work towards delivering the Council’s priorities and vision for the Borough. What we eat can make a big difference to our health and significantly influences health inequalities that exist within St Helens. Diet, especially excess saturated fat, salt and sugar, is thought to play a role in about one third of all deaths from cancer and heart disease. Almost 70,000 premature deaths could potentially be prevented each year if UK diets matched nutritional guidelines. Officers have an influence on food provision within businesses and are in a unique position to enforce, promote, advise, educate and inform.

Our food enforcement officers work with local businesses during inspections to ensure that nutritional labelling on food is accurate and claims made are not misleading. This enables consumers to make informed choices about the food that they eat. We also work with businesses to ensure colourings, additives and other ingredients are at safe levels and do not lead to long-term health problems for consumers.

When working with businesses we encourage them to provide healthy options and actively highlight these to customers. We have also carried out a number of food related projects aimed at addressing specific health issues in our area and engaging local residents about nutrition. These projects are described briefly in this report.

2.7 Regulation Policy

We have an enforcement policy, which provides guidance to officers, businesses and the general public on the range of options that are available to achieve compliance with legislation enforced by St. Helens Regulatory Services. The policy has been approved by St. Helens Licensing and Environmental Protection Committee.
3.0 **Service Delivery**

3.1 **Food Premise Interventions**

Continuing regulatory reform is likely, reflecting national political changes. These reforms aim to reduce administrative burdens on businesses and ensure that the service continues to provide effective inspection and enforcement, focusing on outcomes rather than inputs.

Traditionally, all food premises have been subject to food safety and food standards inspections, the frequency determined by risk rating schemes. Although the risk rating schemes remain intact and food premises continue to receive visits based on the level of risk, as an alternative to conventional inspections, on occasions, other interventions will be employed when securing compliance with food legislation:

These interventions include:

- **Official controls such as:** Inspections and Audits; Sampling; Monitoring; Verification;

- **Non-official controls such as:** Advice; Coaching; Education/training;

High-risk food premises (A’s, B’s and non-compliant C’s) will continue to receive programmed food hygiene inspections or audits. C rated premises that are broadly compliant may receive other official controls as appropriate. Low-risk food businesses (D rated premises) will alternate between official controls and other interventions. The lowest rated food businesses (E rated premises) will be assessed by an Alternative Enforcement Strategy that involves completion of a questionnaire and visits where necessary.

The choice of intervention undertaken will be determined by the individual Environmental Health Officers (EHO) on a case-by-case basis, under the supervision of the Principal EHO.

The premise risk profiles are provided in Appendix 4. In summary for food safety interventions, the following are required in 2013/14:

- A rated premises: 5
- B rated premises: 101
  
**Total high risk:** 106

- C rated premises: 437
D rated premises 214
E rated premises 131

Total low risk 782

Unrated premises 59

(These unrated premises are food operations that have been added to the premise database but have not yet received a programmed inspection. They consist of childminders, low risk businesses such as garage forecourts and post offices for example and some higher risk businesses that have changed ownership)

Approved Premises approved under EC Regulation 853/2004 6
(Manufacturers of foods comprised of products of animal origin. These premises require a health mark)

Premises registered under EC Regulation 852/2004 1370
(All food businesses requiring food safety enforcement within St Helens, including approved premises)

Of the total number of registered premises, 888 have been “tagged” on the database as requiring an inspection or alternative intervention during 2013/14. With the staff available, the service is committed to completing all food safety inspections of A and B rated premises. It also aims to complete 80% of C and 60% of D rated premises interventions. In respect of the C and D rated premises, which do not receive their programmed interventions, this work will be carried forward and completed during the following year.

The shortfall described above equates to 85 C rated and 81 D rated premises, which will not receive inspections or interventions in accordance with statutory guidance. In order to complete such work, it has been determined that an additional fully qualified half post would need to be provided within the Food Safety team.

Since 2011, the Council have adjusted the manner in which Food Standards interventions are programmed. All premises are risk assessed in line with the Food Standards Agency Risk Rating Scheme. This risk assessment is now used in conjunction with intelligence gathered nationally, such as by the FSA Food Fraud Team and locally, particularly from consumer complaints and officer observations. This information is used to develop a range of projects that allow us to make appropriate and effective interventions with our food business.

All A rated premises will be inspected. Officers complete an inspection which targets identified areas of risk in the business, problem products, identified national priorities and requests for advice from the trader. This helps us to provide the most effective intervention possible, which is of benefit to the business and consumer alike. We inspect all B rated food manufacturers and processors in the same way. Many of these businesses will receive input from our officers in addition to the planned intervention.

We do not plan to inspect any non-manufacturing B and C rated premises on a programmed basis, other than those that have previously been identified as non-compliant. We plan to conduct focused interventions with all our non-compliant businesses, with the aim of bringing them into compliance within the year and sooner if possible. We do still plan to complete appropriate interventions with a number of B rated premises this year, in line with Code of Practice 40 requirements. The
interventions planned involve targeted project work (which will include sampling) across particular business sectors, intended to address known risks, and the provision of tailored advice. Food Standards officers may utilise an inspection rather than intervention if they feel this to be appropriate at that time of their visit.

Methods to make the most of Council food standards interventions, for both the business and ourselves will continue to be examined this year. The intention is to look at how we conduct, record and report on our intervention work in order to work effectively and efficiently with the businesses and obtain meaningful outcomes that are valued by all.

Since 2011, we have carefully considered risk ratings, to ensure that small businesses are not over inspected. This work will continue during 2013/14. We will be utilising the information we gather from our targeted interventions to inform this work and expect that this will reduce the number of B rated premises.

3.2 Complaints

It is the policy of the Division that all complaints are investigated.

Food Safety and Hygiene complaints and referrals received by the Food Safety Team will be responded to within 2 working days of receipt. Food Standards and Feeding Stuffs complaints and referrals received by the Food Standards Team will be responded to within 1 working day. All complaints will be dealt with in accordance with food service Practice and Procedure notes, which in return requires that the complaints should be dealt with having regard to the Food Law Code of Practice and other relevant guidance.

It is difficult to estimate the number of complaints expected during 2013/14 as we saw a sharp rise in complaints during 2012/13, with 427 complaints received, compared to 230 the previous year. We anticipate that there it is likely that we will see a further rise in the number of complaints received, due to the economic climate and recent media attention on food issues. The majority of food complaints relate to food safety, with 382 food safety complaints investigated in 2012/13. During the same period the food standards team investigated 45 consumer complaints relating to the composition and labelling of food.

3.3 Home Authority Principle

There are currently a small number of major food businesses with their principal base within the borough, however the Division fully supports the Home Authority Principle and will provide the necessary support to businesses as and when appropriate.

Aimia Foods Ltd        Edmund Barton Ltd
Barry Callebaut Vending Westbridge Foods (Haydock) Ltd
Nichols Foods plc      The Punch Brew Company (Baroncroft Ltd)
Kapak (Europe) Ltd     George Wright Brewery
Cuisine Centre Northwest

No Primary Authority agreements have been formed yet, however we will actively pursue engagement with businesses that are located in St Helens and that have other outlets outside of the Borough with a view to increasing the number of
formalised Primary Authority Partnerships in respect to food safety, food standards and health and safety. Training will be provided to officers to enable them to promote the Primary Authority Partnership initiative.

3.4 Advice to Business

The service provides advice and support to businesses. In undertaking such a role, it is anticipated that legitimate business will be informed and encouraged to meet the highest standards of trading to the benefit of themselves, and consumers. Provision of advice and support will be provided in line with the Food Standards Agency Code of Practice and clear distinction will be made between statutory requirements and good practice in such communications.

The service has built strong links with the local Chamber of Commerce, which has enhanced and improved the level of advice and support we are able to provide to businesses in St Helens. Trading Standards provide advice to new businesses through regular participation in the New Enterprise / Start Up programme at the Chamber. Our relationship with that organisation continues to produce requests for advice from fledgling businesses.

Upon receipt of Food Registration notifications from new businesses, EHO’s contact the business proprietors and visits are made to advise on the requirements of the Food Hygiene Regulations prior to businesses starting to operate.

3.5 Sampling

Food Hygiene

Food Samples are taken from food businesses on a regular basis for microbiological examination. There is the potential for certain high-risk foods to support the growth of microorganisms, which in turn can cause food poisoning. By taking these samples we are seeking to confirm that the standards of food safety management systems within businesses are effective. The aim being to detect contaminated food and to correct any problems with regard to the manufacture, handling or storage of food, before any illness is caused.

The major proportion of the sampling regime to be undertaken in 2013/14 is as part of National and North West Regional Sampling programmes led by Public Health England. Samples will also be taken as part of a St Helens local programme the criteria for selection based on previous poor results and high-risk operations. This year’s local sampling plans include ready to eat foods from Approved Premises, cooked meats, paté, made to order sandwiches and foods and swabs from mobile caterers.

A copy of the sampling programme for 2013/14 is in Appendix 5.

Results of samples will be notified to the proprietor of the business. Where results are unsatisfactory an officer will visit to give advice and discuss corrective actions to be taken, and it is likely that further sampling will be carried out.
Any actions taken as a result of sampling will be in accordance with the Council’s Enforcement Policy.

**Food Standards, Fertilisers and Feeding Stuffs.**

The Authority has appointed Lancashire County Scientific Services, Peddars Way, Riversway Docklands, Preston as its Public Analyst and Agricultural Analyst, the Public Health England Laboratory, Preston is used for the bacterial examination of foodstuffs.

Food standards and feed samples are taken when a complaint is received, during the inspection of our manufacturing premises, in the course of any enforcement activity, including inspections and when needed within our food and feed projects.

A number of projects are planned during the year and will be completed at the same time as our programmed routine inspections. Most are linked with traditional enforcement issues, aiming to look at known and emerging risks. We target sampling to foods with the most significant prejudice to the consumer and other business, should adulteration occur, or if the product has not be honestly labelled.

The authority has participated in a bid made by the regional group, TSNW (Trading Standards North west) for FSA funding linked with the National coordinated risk-based food and feed sampling programme, led by our Public Analyst Service. We will finalise our food standards sampling programme, once the outcome of that bid is known.

All food standards samples are recorded on Food Surveillance System (FSS) and the system will be utilised as an intelligence tool, allowing us to coordinate with other authorities and target projects and sample effectively.

Details of the sampling planned for 2013/14 is included in Appendix 5.

**3.6 Infectious Disease Control**

Notifications of food or water borne diseases will be investigated within 2 working days of receipt; they will be dealt with in accordance with the sections’ Procedure and Practice Notes.

All notifications will be visited except campylobacter notifications that are interviewed by telephone. If there are, however, noted clusters of campylobacter notifications, visits will then be made. If there is a problem with access for any notifications then the interview may be carried out by telephone. Subsequent investigations as necessary will be undertaken with local food businesses or passed on to other relevant authorities in order to ascertain the source of illness and ensure that appropriate control measures are in place.

Average notification numbers for the year would indicate that about 200 notifications will be received in 2013/14.

The former Health Protection Agency documents ‘Cheshire and Merseyside Communicable Disease Joint Communicable & Infectious Disease Incident/Outbreak Plan’ and ‘Arrangements between Cheshire and Merseyside HPU and Local Authorities for the investigation of sporadic cases of infectious Disease’ were updated in April 2011 and January 2012. These clarify the responsibilities of various
3.7 **Food Safety Incidents**

Food Hazard Alerts are received by e-mail from the FSA, are passed immediately to the Principal Environmental Health Officer, Commercial Services with responsibility for Food Safety (in their absence to the Chief Environmental Health Officer), who will then decide what action should be taken depending on the category of the Food Hazard Alert, and the information given in the warning. Action will be taken having regard to the Code of Practice. The number of warnings received, and the number requiring significant action varies each year, it is therefore difficult to predict the demand on the service.

Food Hazard warnings may be received by Trading Standards through a variety of routes, such as notifications made by the Food Standards Agency, via TS Interlink and via the Principal Environmental Health Officer for Food Safety. All such warnings will be brought to the attention of the Principal Trading Standards Officer responsible for Food Standards work (or in their absence, the Chief Trading Standards Officer). They will determine the relevant action to be taken, in line with the Food Standards Practice and Procedures and the Food Law Code of Practice. The number of warnings received and the numbers that require significant action vary from year to year. Therefore, it is difficult to predict this demand on the service.

There may be a need for the Trading Standards to issue a food hazard warning in respect of food standards matters. If such a warning were to be issued then this would be done in accordance with the Food Standards Practice and Procedures and in line with the relevant section of the Food Law Code of Practice.

Similar warnings may be received or issued in relation to Feeding Stuffs and Fertilisers. If such a warning were to be issued, then this would be done in accordance with the Feed Standards Practice and Procedures and in line with the relevant section of the Feed Law Enforcement Code of Practice.

3.8 **Liaison with Other Organisations**

The Food Service adheres to the Home Authority and Primary Authority principles.

The Environmental Health service has links with the authorities in the Merseyside and Cheshire area, The Food Standards Agency and the Health Protection Agency, through the Food Safety Subgroup, and through this to neighbouring subgroups of Lancashire and Greater Manchester. The subgroup meets every 6 weeks.

The Trading Standards Service has liaison, communication and co-ordinating links with 23 Trading Standards Authorities in the North West. This operates through a co-ordination group, called Trading Standards North West (TSNW). TSNW works in line with the National Intelligence Model, with strategic lead officers and analysts determining the areas of priority working for the region and providing intelligence to assist authorities in targeting resources to areas of need, as well as providing greater
co ordination between the authorities. St Helens are actively involved in the work of this group’s Food Standards Focus Group.

3.9 **Promotion**

**Training**

The division will continue to deliver the following food related training courses throughout 2013/14 to the business sector and to community groups:

- Chartered Institute of Environmental Health (CIEH) level 2 course, Food Safety in Catering (6 hours)
- Food Safety refresher course (3 Hours)
- Food Safety Awareness (3 hours)
- CIEH Nutrition and Special Diets level 2 course. (6 Hours)
- Nutrition Awareness (3 hours).
  - CIEH Level 2 Health and Safety
  - CIEH Level 2 Risk Assessment

The division will also evaluate the current provision of training in food safety and health and safety for those young people who are neither in education, employment or training. If considered to be feasible bespoke training will be provided for this identified group of people. Consideration will also be given to the feasibility of delivering Level 3 training in Food Safety, as currently there are no identified local training organisations that are able to provide this training.

**Food Safety Coaching Workshops**

Non-compliant caterers and proprietors of small non-compliant convenience stores that handle high risk foods will be targeted. The aim being to invite them to workshops in order to assist, guide and coach staff and owners in ways to improve their management systems in both food safety and health and safety. The Food Standards Agency Safer Food Better Business Pack is provided free of charge and EHO’s explain how to complete and implement the management system. Workshops have been a more efficient use of officer time and have focused the businesses’ attention to complying with the law and improving standards. This stepped approach should improve food safety compliance and the ‘broadly compliant’ indicator that is reported to the agency each year.

Those businesses that do not take up the invitations will be visited and in order to ensure compliance the stepped enforcement approach will be implemented by the sending of letters and the use of Hygiene Improvement Notices as required.

All courses will continue to be evaluated and the presentations reviewed in the light of the assessment.

The division will continue to issue press releases regarding food safety or other issues as necessary;
Food Standards Promotion

Trading Standards will promote publicise and raise awareness of food standards issues as and when identified as necessary. This will be done through the issuing of press releases, development of advice literature and through direct communication to traders and consumers as appropriate. Prosecution outcomes of note will be publicised for information. Most of the Food Standards projects to be undertaken are designed to raise awareness of food standards, food labelling and nutrition. These projects are ideal vehicles for promoting the service, consumer and business education being integral to the success of the project.

3.10 Early Years Healthy Food Award

This work is undertaken in partnership with St Helens NHS, Bridgewater and St Helens Council Healthy Early Years Status (HEYS). Recipients of the healthy food award complete a part of the status assessment required for HEYS, which also encompasses physical activity (active play), safety, emotional health and well-being and personal, social and health education. Settings that obtain the Food Award often view this as the starting point for their application for HEYS. Environmental Health are active members of the HEYS steering Group. EHO’s reassess the validity of Healthy Food Awards, if held, each time a setting is inspected for purposes of food safety. Settings must obtain at least a Food Hygiene Rating of 3 in order to either apply for or maintain a Healthy Food Award.

3.11 Hot Food Takeaways – The use of Cooking Oil

Working in conjunction with the Public Health Directorate, this project aims to contribute to the St Helens Health and Wellbeing Strategy 2013/16, priority 4 Obesity and Excess Weight. Working with hot food takeaways, the aim is to improve the nutritional quality of takeaway foods. Evidence will be gathered from businesses as to the types of oil used, the cooking temperatures used, how often oil is changed and the types of foods deep fried. Consideration will also be given to portion sizes.

Best practices will be identified and it is planned for guidance to be issued informing fryers how to get the best from their oil thereby improving the overall nutritional quality of the food served.

3.12 Food Safety Week

Each year the Food Standards Agency co-ordinate a Food Safety Week and this year it is to be held on 10th-16th June. This year the theme is Kitchen Check. The aim is to encourage the public to reassess their food safety practices at home in their own kitchens. The “kitchen check” sheet that can be used online at the FSA site and which is to be produced as a leaflet focuses attention on cleaning, cross contamination, chilling of foods and cooking of foods.

The service in support of this initiative will publicise the week by issuing press releases, placing information on the Council’s intranet and will spend a day in a local supermarket speaking to the public and handing out the Kitchen Check leaflets.
3.13 ATP (Adenosine Triphosphate) monitoring

In April the Food Standards Agency provided all authorities in Merseyside and Cheshire with ATP monitoring units. These monitoring units enable officers to demonstrate to food businesses the effectiveness of their cleaning, disinfection and sanitising regimes. Surface swabs are taken of work surfaces or equipment and are then placed in the handheld reader unit. A numerical reading is displayed which is indicative of the level of environmental contamination, which may indicate a failure in cleaning systems.

The ATP unit will be utilised as part of the Food Safety regulatory work, with surveys being undertaken of mobile food traders, made to order sandwich premises and salad bars. The Service is also committed to utilising the ATP unit in any survey which may be directed by the Food Standards Agency.

3.14 Mobile Caterers

The Commercial Services team, of which the food safety service is part, is responsible for enforcing the Street Trading Consent Scheme. Currently there are 40 mobile food traders who are consented to street trade within the borough. Each mobile unit is subject to annual inspections for food safety and food hygiene ratings are awarded following each inspection.

3.15 Crucial Crew

The Service is committed to delivering, together with partner agencies the Crucial Crew initiative which is aimed at all year 5 children who attend schools within the borough.

Crucial Crew is a fun way in which children's safety awareness is enhanced as they take part in interactive scenarios. For 2013/14 the event is to be hosted by Saints RLFC and they have committed to providing a health, sport and fizzy drinks scenario. The reason for this being that children's consumption of high energy drinks should be discouraged. Children need to be encouraged to drink healthier alternatives.

3.16 Smokefree

The service is responsible for enforcing the smoke free legislation in businesses. During inspections of premises if an officer discovers evidence of smoking within a workplace the necessary advice and action is taken in accordance with the Enforcement Policy.

3.17 Allergen Labelling in Catering Premises

Work is planned that will look at the current level of understanding of the need to provide information to customers relating to the 17 identified allergenic foods, when providing food in cafes, restaurants, pub, canteens and at functions. The intention is to raise awareness of the need to identify allergens and prevent cross contamination. We will also provide advice that will allow such businesses to prepare to provide
appropriate allergen information to their customers, which will become a legal requirement under the Food Information Regulations.

3.18 **Fat in Mince, meat speciation and traceability**

Legislative changes mean that in the near future, maximum fat levels will be set for minced meat products, particularly when the mince is described as “lean” or “very lean”. Mince is an important meat for families living on a low income, so it is important that those buying mince, get value for money, including those who will pay a premium price for a lower fat product to improve their diet and health. Officers will be sampling minced meats from local butchers to ensure that the fat levels are satisfactory. The samples will also be tested to ensure that the mince only contains the species of meat it purports to be made from, and has not been adulterated with a cheaper meat or offal. Similar checks may be made on other economy meat products produced by our butchers and we will also be making checks to ensure that the meat stocked is traceable back to the source animal. This work is intended to address any issues of food fraud in the local meat trade, following the issues found with cheap meat products contaminated with horse meat across Europe.

3.19 **Family Meals – comparison of nutrition and value for money**

Information collected by Public Health professionals suggests that families on low incomes will purchase low cost ready meals, or food from the local takeaway as an alternative to home cooking, as such foods are perceived as “cheaper” and there is often a lack of proper cooking equipment, or knowledge of how to prepare a meal. Research indicates that such foods have low nutritional value and in many cases do not represent good value for money, when compared on the basis of calorific value, fat, saturated fat, sugar and salt to food prepared from fresh ingredients.

Officers are going to make a comparison of the nutritional value of a range of ready meals and takeaway foods against comparable “cooked from scratch” meals, utilising nutritional analysis software. A comparison will also be made of the cost of the convenience meal, against the cost of the ingredients for our “homemade” version, purchased where possible from local retailers. It is hoped that we will be able to develop a set of recipes that will be made available for residents and that Health Improvement partners will utilise these during community cooking demonstrations. This work should assist the efforts being made to improve diet, whilst supporting our local businesses.

3.20 **FSA Funded Sampling**

We have participated in a bid made by the TSNW Food Standards Group for funding from the Food Standards Agency, which will help us participate in the national coordinated risk-based food sampling programme 2013/14.

We hope to take samples connected with: fat in minced meat, meat speciation, added water in chicken, PAA’s in nylon kitchen utensils, formaldehyde in melamine cookware, acrylamide in chips, PAH’s in cooked meats, ground nut powders at caterers and unauthorised health claims. We also hope to have sampling for listeria...
in ready to eat foods funded and these samples would be taken by the food safety team.

This funding is very welcome as it allows us to take additional samples beyond our own budgets, so increasing our involvement in national issues.

3.21 **Areas of Improvement.**

We will continue to utilise the range of interventions developed over the last 2 years, in addition to inspection, particularly the use of very focused sampling, and examination of particular issues in food standards as this will enhance the outcomes of our food work. We hope that this will allow us to advise more businesses and take effective enforcement actions against deliberate wrongdoing.

We also hope to improve our intelligence resource by utilising Food Surveillance Systems. Similarly, we are improving the quality of the information held on our database, through the use of protocols and coaching techniques.
4.0 **Resources**

4.1 **Financial Allocation**

For 2013/14 the Environmental Health and Trading Standards Division has an overall estimated net budget of £1,731,077 and employs 42 staff.

Food Standards

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**Cost of Food Standards**

| Cost of Food Standards | £40,667 |

Food Safety

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**Cost of Food Safety**

| Cost of Food Safety | £266,311 |

Food Safety is allocated 15.38% of the overall budget.

Food Standards is allocated 2.35% of the overall budget.

The Services are responsible for the enforcement of legislation relating to Food Safety, Health & Safety, Consumer Safety, Pollution, Drainage, Housing, Refuse, Weights and Measures, Fair Trading, Trade Descriptions, Prices, Consumer Credit, Consumer Advice, Animal Health & Welfare and Road Traffic. It also provides a Pest Control, Dog Warden services and Health Promotion.

Further details of the allocation of resources are in Appendix 6.

4.2 **Staffing Allocation**

The Food Safety section is staffed as follows:

- **Principal EHO Commercial** 50% of time
- **4 Environmental Health Officers (EHO)** 100% of time
- **Environmental Health Graduate** 90% of time
- **3 Health and Safety specialist EHO** 5% of time
- **Commercial services officer** 30% of time

The Food Standards section is staffed as follows:

- **1 x Principal TSO** 20% time
- **3 x Senior TSO** 15% time
- **1 x Senior CPO (Consumer Protection Officer)** 5% time
- **1x Operational Support Officer** 10% time
(The figures stated above for Food Standards are a minimum as the section work flexibly in order to accommodate needs, such as dealing with food hazard situations, when more resources will be made available).

All staff hold suitable qualification and experience for the tasks that they are required to perform. The Principal TSO and one Senior TSO hold the Diploma in Trading Standards (DTS) and the lead assessor qualification both are authorised to inspect A rated premises.

Of the other Senior TSOs one is authorised for B and C rated premises only whilst the other officer has not undertaken food standards work for several years, so at present is completing a period of supervised work and it is hoped that they will be authorised for B and C rated premises later this year.

The Principal TSO and one Senior TSO have sufficient qualification and recent training to undertake duties under feed legislation.

The Senior Consumer Protection Officer and Operational Support Officer are not food qualified so are not authorised food officers and only participate in food work in a supporting role.

4.3 Staff development plan

All officers are appraised annually in accordance with the Authority’s appraisal and development scheme and procedures. Individual development needs are identified during this process. Officer development and progress is reviewed after 6 months. Training needs are fed into the Divisional Training plan for 2013/14.

All officers will receive a minimum of 10 hours update training as specified in the Food Standards Agency Code of Practice and will be based on the principles of continuing professional development.

The training programme is attached in Appendix 7.
5.0 **Performance Indicators and Quality Assessment**

The Division monitors its performance of the Food Law Enforcement Service Plan at regular intervals. The Chief Environmental Health Officer and Chief Trading Standards Officer monitor performance on a monthly and quarterly basis. In addition, each year performance is compared as part of the service planning process; the Cabinet member endorses the Service plan.

**Performance Indicators**

Infectious disease investigation response times;
Service request response times (food safety complaints)
Number of high-risk inspections undertaken (food safety/standards)
Number of businesses broadly compliant (food safety);

**Quality Assessment**

**Food Safety**

All officers are monitored on a monthly basis to ensure that targets are being met with regard to response times and inspections due. The PEHO will also examine in detail the post inspection administration and actions taken by one officer each month. All approved premise files are examined after inspection and all notices and prosecutions are examined before action is taken.

All officers are accompanied by the Principal Officers during visits at least once during the year to ensure that inspections and any enforcement actions are carried out in accordance with the legislation, the appropriate Code of Practice and Practice and Procedure notes. The Principal Officer keeps a record of these visits and any discrepancies discussed with the inspecting officer. Each officer will also peer review a colleague once a year, with shadow visits forming part of the exercise and officers completing a record of reflective learning.

All food sampling results are examined as they are received from the laboratory. Food related service requests will be assessed at a rate of 2 per individual officer per month.

Calibration records of temperature thermometers and probes are checked every 6 months.

**Inter Authority Auditing**

As part regional Merseyside and Cheshire Environmental Health subgroup business plan, interauthority auditing will continue into its third year this being a 4 year rolling programme. Two officers from Warrington and Sefton Councils will audit the service in respect to controls in Approved Establishments against the Food Standards Agency framework agreement.

**Food Standards**

The following monitoring arrangements are currently in place;

Workload updates are conducted by the Principal Trading Standards Officer (PTSO) with all officers every month. Prior to the workload update the PTSO makes a check
on the records of each officer, relating to each complaint that has been, or is being dealt with and each inspection/intervention completed by them. The PTSO looks at the records to ensure that appropriate action has been taken and that the work has been recorded correctly, including checks that risk ratings have been calculated appropriately. A check is also made that all targets, particularly those for high-risk inspections and projects are being met.

During the workload update, the PTSO will discuss any issues found with the officer and will request corrective action where required. The PTSO will also provide advice and direction on all current complaints, projects and investigations being undertaken by the officer. A record is made by the PTSO of the discussion and this is given to the officer. The PTSO will make the Chief Trading Standards Officer aware of any significant or persistent variations from our prescribed standards.

The PTSO also makes regular reviews of all premises records held on the FLARE database, to check that food premises are appropriately recorded, with particular regard to premises types, risk scores, next inspection dates and general accuracy.

During 2012/13 practices and procedures relating to recording complaints, interventions and samples were updated, with the intention of setting some clear parameters in relation to work recording on the database. A general review of the Food Standards Practices and Procedures was commenced in early 2013 and this will continue throughout the year. The revised procedures will be implemented during this year, which will improve consistency and aid transparency of monitoring.

The PTSO works closely with the food officers and on occasion accompanies them during inspections and other intervention visits. A record of the accompanied inspection is made and the PTSO will consider the officers approach to the work against the relevant legislation, the Food Law Code of Practice, Practice and Procedures and relevant guidance. The PTSO will discuss any issues identified with the officer and ensure that guidance and training are provide if needed. The PTSO will advise the CTSO of such matters if necessary.

All Prosecution Reports are examined by the PTSO and Chief TSO, taking into account the Regulatory Services Enforcement policy before action is taken.

Throughout the Division.

The Environmental Health service and the Trading Standards service produce annual service plans and a joint food service plan, which are approved by the authority.

Both services produce a half yearly monitoring report for the authority based on performance against the targets set in the service plans.
6.0 **Review of Activity in Food Standards 2012/13**

The work carried out by the Food Standards Team continues to be carried out diligently and enthusiastically by officers whose work achieved the targets, which they had been set, despite a Senior Trading Standards Officer vacancy between August 2012 and January 2013. Once again, the food standards team benefited from efficient planning and monitoring.

**Staff**

The team continued to work as generic officers, covering the full range of trading standards legislation in their work, in addition to food standards inspections, complaints and projects.

**Staff Development**

All Food Standards Enforcement Officers received the minimum of 10 hours CPD (continuous Professional Development), training as required by the Food Standards Agency. All officers attended more than one external training event, some of which was provided at low cost by the Trading Standards North West (TSNW) Food Standards group. Subjects covered by staff in 2012/13 included:

- FSA Update
- Investigations Skills
- TSNW Food Update
- FSA Contaminants Sampling
- FSA Imported Food Update

The Senior TSO recruited in January 2013, who has not undertaken food standards work for several years has benefited from attendance of a number of external training events and is being mentored by colleagues. This support will continue over the coming months and it is hoped that this officer will soon have undertaken sufficient refresher training to be authorised to undertake food work for the authority.

We are seeking similar training opportunities for our officers this year and intend to utilise peer mentoring as a method of developing officer skills and dealing with the implementation of new legislation.

7.0 **Review of Service Delivery in Food Standards 2012/13**

7.1 **Programmed Premises Interventions**

The food standards team achieved all of their programmed inspections of High Risk (A rated) premises and were able to work with these businesses on particular issues throughout the year. All Medium Risk (B rated) food manufacturers and packers were also subject to a focused inspection or other intervention. In particular, the officers provided advice and support to our food manufacturers and packers to help them prepare for the labelling changes that will be required to comply with the Food Information Regulations when the transitional period has passed.

In 2011, a decision had been taken not to schedule inspections of non manufacturing medium risk business as it appeared that these inspections, were not identifying
significant issues, with only minor non compliances being noted for the majority of premises. It was also apparent that these inspections were not providing any significant benefit to the traders concerned, or their customers. A review of risk ratings was commenced at the same time, which indicated, that many of our medium risk premises had continuously been risk scored too high, as trading histories were good and the minor non compliances found did not justify the score allocated in relation to the “confidence in management” or “confidence in control systems” elements of the risk rating scheme. We now have fewer premises recorded as medium risk. This review will continue and we anticipate further reductions in the number of businesses risk rated in category “B”.

In 2012/13, a number of projects were completed, that were designed as intelligence based, targeted interventions with medium and low risk food businesses. The projects were developed to address certain groups of traders (public houses), where a specific risk had been identified nationally and locally (illicit/ counterfeit alcohol). We also targeted certain food products, identified through the FSA Sampling Priorities and local intelligence.

Through this approach, we completed 153 targeted interventions 81 of which included a primary inspection.

36 of our primary inspections were of Primary Production businesses (farms) many of which were completed at the same time as a feed inspection. We also undertook work with food manufacturers who are disposing of waste food for feed use.

We intend to continue with this method of engaging with and challenging our low and medium risk food businesses, as early indications are that our officers have been able to identify a number of significant issues using this approach and through early intervention have removed the problems. We will also continue to work with any non-compliant businesses, encouraging them to take corrective actions to eliminate the issues, within short timescales, rather than waiting for their next inspection to become due.

7.2 Formal Action

The Food Standards Team has completed a lot of work in relation to infringements identified by officers on inspection. Much of this work has been the provision of business advice in order to resolve problems and prevent future infringements. The vast majority of non-compliant businesses have been brought into compliance by the end of the year through this process. Other matters have been resolved through liaison with the Home Authority for the business concerned.

In July 2012, the food standards team participated in an operation led by Merseyside Police, looking at the activities of a local Public House. The operation was a partnership between many agencies, including HMRC, the Gambling Commission, the authorities Licensing Team, the Environment Agency and Kegwatch. A warrant was executed at the premises and a wide variety of offences were identified. A large amount of cash was also seized by the Police.

The food standards team identified a significant quantity of illegal alcohol and tobacco, which were seized by them. Further quantities of alcohol and tobacco were also seized by the officers from the licensees’ home address. The total value of this seizure is estimated to be approximately £25,000. The seizure included vodka which
was found on analysis to be unfit for consumption as it contains denatured alcohol and a misdescribed “Scotch” whisky. In addition a large quantity of beer kegs were seized from a yard associated with the business. These have been found to contain a variety of counterfeit beers.

Action has been taken under the Licensing Act to remove the alcohol licence for the premises. The investigation by the food standards officers is now complete and it is anticipated that legal proceedings will be commenced in relation to the various food offences identified.

7.3 Food Complaints

45 food standards complaints were investigated and appropriate action taken, all within the target response times. This was an increase of 50%, from 30 the previous year. The majority of complaints related to the sale of food after the marked “Best Before” date, and the sale of individual packs split from multipacks from local convenience stores. These complaints, which may have arisen because of the economic pressures on such businesses, were dealt with through trader education. There were also a number of complaints relating to the alleged sale of counterfeit and illicit alcohol, again by convenience stores. We believe these complaints may have been the result of national and local publicity regarding the current issues with illegal alcohol.

7.4 Home Authority Partnerships

The food standards officers have had regular contact with all our Home Authority food businesses, and have offered help and support on a number of issues, including the labelling changes that will need to be made to comply with the Food Information Regulations in the near future.

7.5 FSA Food Sampling

We were pleased to obtain funding form the FSA Food/Feed Sampling grant through a bid led by Lancashire County Scientific Service with participants across the region. The funding allowed us to take:

3 samples of sports nutrition products (body building) from local gyms, all of which produced adverse reports. None of the products were properly labelled and one contained only half of the active ingredient it claimed. In addition unauthorised health claims were made. Advice was provided to the gym owners who had sold the products and referrals were made to the food standards enforcement officers in the authorities where the manufacturers are based.

We also took a sample of a drink, which claims to enhance your tan, when used in conjunction with a sunbed. Again, unauthorised health claims were made in relation to the product. The report received indicated that the product would not fulfil the claims made. The investigation revealed that the product is manufactured in Austria, so it has been necessary to liaise with the Food Standards Agency to resolve the issues.

5 samples were taken of herbs and spices that had been purchased in bulk by two of our food manufacturers. The samples were tested for the contaminants mycotoxin and aflatoxin that are known to be carcinogenic. A sample of Ground Paprika was
found to contain higher levels of ochratoxin A, than permitted. Ground Turmeric was found to contain higher levels of aflatoxin B1 than is permitted. The investigation conducted revealed that the products had been supplied, prior to a change in legislation, which tightened the limits for these contaminants. The suppliers and importers of the products were provided with advice on the new legal requirements.

4 samples were taken of fresh pork, beef and lamb from local farm shops, where the meat had been reared on the farm, here in St Helens. The meats were tested to ensure that they did not contain dioxins, dioxin like PCB’s or PCB’s above the permitted levels, these being substances that have given rise to recent food scares, arising from poor farming practice. All of the samples were found to be satisfactory.

2 samples were taken of smoked meat and fish from supermarkets. These were tested to ensure that the content of polycyclic aromatic hydrocarbons in the food was acceptable. These are substances that can arise form the smoking process and are linked with cancers. Both samples were found to be satisfactory.

3 samples were taken of vegetable products sold from a supermarket deli counter. These were tested to find out whether they contained any peanut protein, which could cause an allergic reaction. The samples were taken, as pending changes in legislation will require allergenic ingredients to be declared for food sold loose. None of the samples were found to contain peanut.

7.6 Spirit Substitution project

Nationally, the substitution of branded spirits with a cheaper spirit remains an issue in pubs, clubs and restaurants, despite many years of targeted sampling and enforcement action. Whilst some businesses substitute the product with a supermarket brand, incidences of harmful illicit spirits are becoming more common.

During the early summer, in the run up to the Olympic Games, officers made covert visits to 47 public houses in the area and took samples of 93 spirit drinks, mainly Gordon’s Gin, Smirnoff Vodka and Bacardi Rum. The officers conducted tests on these drinks, to check that they were of the purported brand. The samples were also tested to ensure that they had the correct alcoholic strength, as discrepancies in the ABV can indicate an illicit product. All of the samples were found to be the authentic product, which indicates that enforcement action taken in the past has largely eliminated the practice of substitution in public houses in this area.

7.7 Internet Trading project

Internet sales are an increasing market and we now deal with many complaints about goods, including food products purchased by these means. Recently, we had become aware of new small businesses, because we received a complaint about goods they sold via a website.

Throughout the year we have been making checks on the websites used by businesses based in this area, to ensure that they are fulfilling their obligations under the distance selling laws, as well as examining the products they sell. This work has allowed us to identify a number of food businesses, previously unknown to us. No major issues have been identified with food sold by these businesses, but we made contact with them and the advice we offered was welcomed. This work will continue into 2013/14. and a sample of
7.8 **Market Information Packs**

During 2011, we had developed our relationship with the Market Managers Team, who operate 4 regular markets in the area. This had allowed us to successfully implement the Real Deal programme in these markets, which is intended to ensure that the businesses attending our markets, including many food retailers, trade in a fair manner and do not sell illegal products.

In 2012, we developed this work further, by producing an advice pack, “A Guide to Help Small Retailers Trade Fairly and Safely”, which outlines the main legal considerations for small businesses and provides details of useful sources of information available on the internet. The booklet was delivered to each of the market traders by an officer, who also discussed the applicable legal requirements with the stall holder. The booklet is also available on the council website and is now supplied to all new businesses. We will continue to work with the Market Manager and the stall holders during the next year, to raise standards further.

7.9 **Prevention of the sale of counterfeit goods in the workplace**

The Trading Standards team obtained funding from the Intellectual Property Office (IPO) to complete a project intended to raise awareness about the issues around the sale of counterfeit goods, and we had decided to target such sales in the workplace.

The work involved our officers providing information to the owners and personnel managers of the larger businesses in the area, including our food manufacturers, packers and distribution centres, as well as the major supermarkets. The officers highlighted the economic harm such sales cause to legitimate businesses and the potential safety risks the products can cause, we particularly highlighted the risk of serious illness and death linked with the consumption of illicit spirits. The businesses were asked to cascade the information to their employees and were provided with posters and flyers to distribute, including one design featuring a bottle of “fake” vodka, highlighting the risk of blindness from consumption. We made contact with 84 employers through this work, and estimate that we have provided information to 17,000 employees.

7.10 **Database Management**

Improvements made to our use of the FLARE database throughout the year allowed us to complete the report required under the Local Authority Enforcement Monitoring Scheme (LAEMS) return (which is required by the Food Standards Agency), in a timely fashion, with less data correction work needed than in previous years. We also are now utilising the Food Surveillance System to record our food standards samples and this is proving an effective method of sample recording.

7.11 **Variation from the Service Plan 2012/13**

There were no variations.
8.0 **Review of Activity in Food Safety 2012/13**

Despite the unexpected long term sickness leave of a senior officer in the Food Safety Team in the middle of the work year, the scheduled inspection work was completed. The service was also subject to in November a two day Food Standards Agency audit, which examined the arrangements in place for food premises database management, food premises interventions and internal monitoring with regard to food hygiene law enforcement.

**Food Standards Agency – Audit**

The Audit included a reality check at a food business to assess the effectiveness of official controls implemented by the Council at the food business and, more specifically, the checks carried out by the Authority’s officers, to verify food business operator compliance with legislative requirements. The scope of the audit also included an assessment of the Authority’s overall organisation and management, and the internal monitoring of food hygiene law enforcement activities.

Following receipt of the Audit Report an Action Plan was developed to address the identified recommendations.

**Broad Compliance**

The base line figure for businesses being broadly compliant with food safety legislation has risen from 77% in 2009/10 to 85% in 2012/13. This improvement in compliance measures an output from the activities of the food safety team in comparison with the inputs, such as the number of inspections. It demonstrates that the work of the team has been effective and that the work has been prioritised on priority areas.

**Food Hygiene Rating Scheme**

The national Food Standards Agency’s Food Hygiene Rating Scheme was launched in February 2012, building on the Council’s existing Scores on the Doors scheme.

The criteria for the national scheme meant that an additional 365 premises were now eligible for assessment, these included small convenience stores, green grocers, mobile traders and public houses that traditionally did not sell food.

Internal training was attended by all officers responsible for food safety inspections to ensure that there is consistency in the awarding of scores to businesses following an inspection.

Premises are scored on the suitability of the structure of the premises, the food hygiene practices that are observed within the premises and the confidence in the management of the food businesses. Scores from 0 to 5 are then awarded for each premises. A zero score indicates failure to comply with the legislative requirements and a score of 5 demonstrates a very good compliance. A score of 3 is deemed to be the accepted legal standard.

All scores are available to be viewed on the Food Standard Agency’s website at food.gov.uk/ratings
Following the introduction of this scheme nationally there has been an upturn in the overall standards of food premises, as the scores are consumer driven.

In St Helens the profile of businesses replicates the national picture with 33% businesses obtaining a score of 5, 29% a score of 4 and 24% a score of 3. Any business which scores below 3 is subject to further interventions from the food safety team which can range from one to one coaching in the application of the Safer Food, Better Businesses management practices package to the service of Health Improvement Notices or in the most serious of cases prosecution for failing to comply with the food safety regulations.

**Staff**

The four experienced EHO’s within the team provide a dedicated service aimed at the protection of the public health, the improvement of food safety and they also consider the health and safety standards within food businesses dealing with matters of evident concern during food safety inspections.

The Environmental Health Graduate continues to support the EHO’s in terms of sampling, investigation of food complaints and infectious disease investigations. This officer also contributes to the food safety and nutrition training programme, food safety promotional work and the Crucial Crew event, which promotes children’s safety messages to all year 5 children who attend schools in the borough.

During 2012/13 one of the EHO’s had extended sickness leave, despite this unforeseen event all high risk businesses were inspected and the inspection programme was completed.

**Staff Development**

All food safety staff received the minimum of 10 hours Continuous Professional Development training on food safety related topics as required by the Chartered Institute of Environmental Health.

Staff training was undertaken in the following areas:

- Food Safety Update training
- Food and Environmental Sampling
- Ecoli 0157 Guidance
- Fats, Oils and Grease
- NAFN Intelligence
- HACCP
- Health and Safety NEBOSH Certificate
- Asbestos Awareness
9.0 **Review of Service Delivery 2012/13 – Food Safety**

9.1 **Food Premises Interventions**

The following number of inspections were carried out during the year:

- High risk (A,B rated) 116
- Low risk (C,D,E rated) 521

Despite the unforeseen long term absence of a senior inspector 76% of scheduled visits to premises were undertaken.

The majority of premises that were not visited were rated D or E and comprise of those premises such as pharmacists, post offices and garage forecourts, that is, premises which generally only sell confectionery and other wrapped low risk foods. In line with National Guidance from the Food Standards Agency, resources were focussed on the high risk premises such as caterers of high risk foods where the full suite of interventions are likely to be undertaken. This ensures that the resources available to the Service are used in the best way to ensure an improvement in the standards of the higher risk premises.

9.2 **Formal Action**

Two voluntary closures were accepted. One was in relation to a takeaway premises that had blocked drains and sewage accumulating in the rear yard. The other was a branch of a national chain of takeaways where the EHO found that the premises had no hot water supply. The premises closed for a day, reopening the following day when the officer was satisfied that the hot water supply had been reinstated.

In May 2012, a prosecution was taken against a licensed premises where a smoking shelter was deemed to be non compliant with the requirements of the Health Act 2006.

A formal caution was issued and accepted by an international chain of supermarkets for the displaying for sale pizzas that were past their use by date.

A total of 14 Health Improvement Notices were served and were complied with, without the need for further enforcement action.

9.3 **Food Complaints**

382 food complaints were investigated and appropriate action taken all within the two day response time. This was an increase of 190 complaints from the 192 received in 2011/12. The increase could be indicative of how the national food hygiene ratings are raising the public’s awareness of food safety, also the economic climate could also have had an impact as the public are perhaps less tolerant of poor standards.

9.4 **Primary Authority Partnership**
A sandwich/mobile food trading company relocated to St Helens during 2012 and discussions with the Company are progressing with a view to engaging with them in a Primary Authority Partnership for food safety.

9.5 **Food Sampling**

A total of 169 samples were taken throughout the year as part of national, regional and local surveys. Of these 112 were food and water samples and 57 were swabs of equipment, food surfaces and cloths. All unsatisfactory samples are investigated and advice and further samples are the taken to confirm if improvements have been made.

The sampling activity in 2012/13 was directed by the national, regional and local sampling protocols. St Helens local surveys included the sampling as part of the E-Coli 0157 survey with a focus on school meals catering (30 samples) and the Hot Food Buffets and Carveries survey, (30 samples). Sampling was also undertaken of cooked meats (36 samples) and ready to eat food from the Approved Premises in the borough (16 samples).

The national and regional surveys included the microbiological sampling of the following:

- Ready to eat pre-cut fruits from retail, catering and restaurants
- Non EU imported ready to eat dried foods
- Paté
- Diary Products

Microbiological Hygiene and Safety Study of Catering Premises and Tourism and Events sampling were also included in the protocols.

The sampling outcomes determined that 66% of food samples taken were found to be satisfactory. 20% were found to be borderline/acceptable and 14% failed, however none were found to be hazardous. In these cases officers visited the businesses in order to establish and identify possible causes for the poor results, offering advice and guidance as necessary. Liaison with other authorities also took place if the foods had originated from outside of the borough.

In addition all reports of samples and findings are reported to Public Health England as they form part of the National Studies Report which is circulated to all local authorities. All samples and results are also reviewed regularly by the Environmental Health Cheshire and Merseyside Regional Food Safety sub group.

9.6 **Infectious Disease**

161 infectious diseases were investigated and appropriate action was in all cases within the two day response time.

9.7 **Food Standard Agency Food Alerts & Food Incidents**

Food alerts were received throughout the year and responded to accordingly. In the latter part of the year, there were a number of alerts relating to the adulteration of
meat products with horse meat. The food standards and food safety officers worked together to ensure that all our food manufacturers using meat had taken steps to establish whether any of their meat ingredients were affected by the adulteration. No issues were identified, as all the businesses had validated their supply chain. Information was also circulated to grocery and convenience stores regarding the recall of a Birds Eye product affected by this adulteration, at the request of the FSA.

9.8 Promotion - Delivery of Training

The following training courses were delivered:

- CIEH - Level 2 Food Safety in Catering (6 hours accredited course) x 7
- Healthy Foods and Special Diets (6 hours accredited course) x 1
- Food Safety Awareness (3 hour course) x 16
- Introduction to food safety (2 hour free course to community group) x 1

9.9 Early Years Healthy Food Award (HEYS)

In total, 30 settings now have the HEYS award and in April 2013, a celebratory event was held at the Town Hall hosted by the partners for the new award holders. Settings must have at least a Food Hygiene Rating of 3 in order to be eligible to be considered for this award. An assessment is then made as to the setting’s compliance in respect to:

- Drinks that are provided for children
- How individual dietary needs are accommodated
- How parents/carers are involved in menu planning
- The provision of a balanced diet
- Principles of food preparation

9.10 Coaching Workshops

In May 2012, the Food Safety team ran a second free coaching workshop for owners, managers and staff of non compliant catering premises. The criteria for selection was based on those businesses where the Confidence in Management score was 20 or greater, that is where there was “little” or “no confidence” in the ability to manage food safety.

The aim of the sessions was to assist, guide and coach the non compliant business’ staff and owners in ways to improve their management systems in both food and health and safety.

25 businesses were invited by letter to attend the workshop, with officer’s hand delivering the invitations. Of the 11 businesses that confirmed attendance, 6 actually turned up, this being a total of 8 people. Following the session there was a noticeable improvement in the management scoring of the business’ that attended the workshop, with 2 of the businesses moving from a D to a B score. Issues of poor safety management in other businesses would have been picked up and addressed during programmed food hygiene inspections.
9.11 **Nutritional Improvements in Hot Food Takeaways and Caterers**

It was recognised that the proportion of takeaway food consumed in St Helens as part of a weekly diet is increasing and evidence shows that this type of food is high in unsaturated fats, salt and is high in calorific value.

It has been demonstrated by regional projects that the nutritional content of these foods can be improved by changing cooking methods and ingredients without there being a detrimental affect to flavours and the quality of foods.

The purpose of the Project was to determine the nutritional quality of a selection of traditional takeaway meals. From the analysis of the recipes, it was planned to demonstrate to the volunteer businesses how changes in methods of cooking and amounts of ingredients used could improve the nutritional quality of the meals provided.

During 2012/13, 6 Indian and Chinese takeaways, all of whom had a Food Hygiene Rating of 3 or more, volunteered to take part in the project, and have their most popular dishes analysed. From these analyses the nutritional value per meal was evaluated and interpreted into the traffic light labelling system with providing values for the total fat, saturated fat, sugars and salt. Each recipe was then adjusted using nutritional software so that it came in line with the ‘low category’ value for each of the nutritional elements.

The participating takeaways were then approached and it was recommended that they use the amended recipes on a trial basis and assess sales. There has been a mixed reaction from businesses in respect to the advice given. Those where a small reduction in an ingredient such as salt was required agreed to implement a change immediately, however in those cases where more major changes were required to recipes and/or portion sizes there was more resistance to change. 2 businesses agreed to consider offering a “healthier” alternative meal and 1 business agreed to seek customer feedback on the idea of providing a “healthier” option. 1 business refused to make any alteration to their recipe.

Food Standards officers had undertaken work with local fish and chip shops, to reduce their use of salt, by providing five holed salt shakers, designed to dispense far less salt per shake than the traditional shakers. Advice was also provided on the best use of cooking oils, utilising the FSA “Tips on Chips” guidance. This work was extended in 2012, with the salt shakers and advice being provided to 44 Chinese takeaways. Posters on the benefits of reducing salt consumption were also supplied for display in the shops. Evaluation of the results suggests that the majority of Chinese takeaways kept the five holed salt shakers in use and that 74% of those who did so, reduced the amount of salt they were using by between 10% and 50%.

9.12 **Food Safety Week**

The theme for food safety week was “Your fridge is your friend”. During this week in June, 3 luncheon clubs/community groups were visited advice was given in respect to how to safely store food in a fridge. Leaflets, fridge thermometers and menu planners were handed out. Information was also disseminated to council staff utilising the intranet.
9.13 **E- Coli 0157 survey with a focus on school meals catering**

In response to the Pennington Public Inquiry into the South Wales School Meals outbreak in 2005, the Food Standards Agency produced a guidance document on ‘reducing the risk of Ecoli 0157-controlling cross contamination’. In partnership with the Council’s school meals service and in conjunction with the other local authorities in Merseyside and Cheshire, a survey against this guidance was undertaken in a sample of the school meal kitchens across the region.

The aim of this survey was to determine if schools have systems and procedures in place to minimise the risks of contamination, reducing the risk of food borne and other infections.

The inspections focused on separation of equipment and staff involved in handling raw and ready to eat foods, effective cleaning and disinfection and personal hygiene and hand washing. Surface swabs and high-risk food samples were taken during the visits for microbiological analysis.

St. Helens Council led on this work and analysed the results, collating the final report and recommendations. In total 77 schools were visited across the region and in St Helens 10 schools, both primary and secondary were visited, which encompassed both internal and external catering provision.

Resulting from this survey the following regional recommendations were made:

- Bottles used to contain disinfectants and sanitisers to be correctly labelled in compliance with legislation
- Regular cleaning and sanitising of taps and hand contact surfaces to be carried out
- Improved training /knowledge on the use and dilution of chemicals
- Water at wash hand basins to be between 39 to 41°C
- Further investigation of cloth cleaning methods particularly where cloths are washed by hand.

These recommendations have been agreed by the local authorities across Merseyside and Cheshire who form the Environmental Health Cheshire and Merseyside (EHCM) Chief Officers’ food safety group. Guidance incorporating the recommendations is to be issued to school catering undertakings.

9.14 **Hot Food Buffets and Carveries**

In recent years St Helens has seen an increase in the number of food premises offering buffet food, in particular Chinese restaurants, one of these is exclusively a buffet restaurant. Offering buffet services need careful and thorough planning and preparation. Restaurants that offer buffet services should observe proper food safety practices both in the preparation and in the serving of the foods to assure the safety of customers. Restaurants, and other establishments that offer buffet food should have in place food safety management systems detailing the controls for the safe service of food, e.g. temperature controls, handling practices, sanitising utensils and work surfaces etc.
The aim of the survey was to assess the effectiveness of the food safety controls that were being implemented in buffet style food premises, focusing on the food being served from the dining areas. The types of premises included in the survey were:

- Chinese restaurants
- Carveries in public houses
- Indian buffets
- Other restaurants serving buffet food.

A questionnaire was prepared highlighting key areas for discussion during the inspection, these included:

- Temperature controls for hot and chilled food,
- Stock rotation (topping-up, length of time on display)
- Cleaning systems,
- Training of staff,
- Handling practices
- Food safety systems
- Provision of hand washing facilities

As part of the inspection environmental swabs were obtained from a variety of sites including work surfaces, utensils, ice cream scoops etc. Food samples were also taken. These were mainly high-risk foods including cooked meats, gravy/sauces, prepared salads and ice cream. In some premises samples of cleaning cloth were taken.

To date 6 premises were visited and a total of 13 food samples, 12 environmental swabs and 3 dishcloths were submitted for analysis. These were examined for a range of bacteria including E.coli, listeria, and staphylococci. All samples submitted were found to be satisfactory.

Food business operators have cooperated fully with the survey. The survey provided the opportunity to advise food business’s on safe handling practices and to give updates on current legislation and the Food Standards Agency guidance on cleaning systems with respect to E.coli 0157.

9.15 Variation from the Service Plan 2012/13

There were no variations
APPENDIX 1

LINKS TO THE ST HELENS PLAN  2013-16

Vision for St Helens

“To make St. Helens a modern, distinctive, economically prosperous and vibrant Borough”

The Plan outlines 3 areas they want to achieve;

*Improving People’s Lives*
- We want people to be:
  - Healthy and active
  - Skilled and educated
  - Independent and Empowered

*Creating a Better Place*
- We want St Helens to be:
  - A safer and Stronger Place
  - A Cleaner, Greener and Accessible Place
  - A Thriving, Vibrant & Competitive Place

*Delivering Effectively Together*
- We want all partners to:
  - Share the same principles and values
  - Consult, engage & empower our communities
  - Be open, accessible & transparent
  - Be successful

‘Healthy and Active’

Food Services proactively visit premises, investigate complaints and incidents to ensure local businesses comply with legislation and thereby maintain safe food, products and workplaces.

Infectious disease control investigates notifications from GP’s and hospitals of any food poisoning. Investigations control the spread, ensure businesses comply with the law and provide advice to residents of safe food preparation in the home.

Underage tobacco and alcohol sales work and child safety within the ‘Crucial Crew’ project also contribute to the health agenda.

Environmental Health Officers and Trading Standards Officers are in a unique position as they visit all food businesses and hence have an influence on food provision and use these opportunities to enforce, promote, advise, educate and inform with regard to food law and nutritional messages.

Focal points for action within the plan are to tackle *inequalities in health* and to reduce obesity. Specific project work to support the points are;
- nutritional review of low cost ready meals
- nutritional improvements in caterers and hot food takeaways,
food safety and nutrition training,

Two of the seven key measures of success for ‘Healthy and active’ relate to the **Percentage of obese school children in reception year and the number of smoking quitters per thousand of the population**

The Early Years Healthy Food Award, which focuses on improving nutritional standards within nurseries, crèche and childminders and the work undertaken in respect of enforcing Smoke Free legislation and engaging in the work of the St Helens Tobacco Control Group directly contribute to these key performance measures.

**‘Skilled and Educated’**

Food Services aim to work with local food businesses through the provision of training and coaching. It is also proposed to undertake an evaluation of how the level 2 training courses delivered could be better focussed on young people, who are NEET (not in education, employment or training).

This latter project directly contributes to the key measure of success aimed at **Reducing the Percentage of 16 – 18 year old, who are NEET.**

**‘Independent and empowered’**

The Crucial Crew project supports one of the areas for improvement identified, ‘**ensuring that children and vulnerable adults are safe from harm**’. The food service leads this project which engages with 2000 school children including those with special educational needs, promoting safety messages.

**‘A Cleaner, Greener and Accessible Place’**

As part of the food safety work undertaken by officers, effective management of waste in food businesses is a core consideration. In fulfilling the planned inspection programme officers will therefore be contributing directly to improving environmental cleanliness.

**‘A Thriving, Vibrant & Competitive Place’**

The work helps the changing local food economy to remain vibrant and enables the council to provide practical support to businesses. Compliance with legislation helps fair competition and we offer support for new companies. All aspect of the work undertaken support businesses in order to ensure that healthy, competitive and successful food businesses proliferate within the borough.

**Delivering Effectively Together**

- We want all partners to:
  - Share the same principles and values
  - Consult, engage & empower our communities
  - Be open, accessible & transparent
  - Be successful

Considerable partnership working exists with the following agencies for example;

Public Health England, Food Standards Agency, NHS Merseyside, St Helens Clinical Commissioning Group, Merseyside Police, Bridgewater Community Healthcare Trust, HM
Customs and Revenue, Merseyside Fire and Rescue Service, Regional, neighbouring local authorities,
APPENDIX 2

SERVICE PLAN PROGRAMME 2013/14

Departmental and Divisional Service and Action Plans can be viewed on the council's web based PMF (Performance Management System).

Paper copies of the plans are available on request.
ORGANISATIONAL STRUCTURE CHARTS

Attached on the following pages are copies of organisational structure charts for:-

1) Department - Management Team
2) Division - Environmental Health
   - Trading Standards
### APPENDIX 4

#### FOOD STANDARDS & FOOD HYGIENE

**Food Standards – Premise / Works Profile 2013/14**

<table>
<thead>
<tr>
<th>Code</th>
<th>Establishments</th>
<th>High Risk</th>
<th>Medium Risk</th>
<th>Low Risk</th>
<th>No Risk</th>
<th>Total food businesses</th>
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<td>0</td>
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<td>Importers / Exporters</td>
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<td>2</td>
<td>0</td>
<td>0</td>
<td>2</td>
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<td>F</td>
<td>Distributors</td>
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<td>5</td>
<td>16</td>
<td>0</td>
<td>21</td>
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<td>G</td>
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<td>171</td>
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<td>436</td>
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<td>290</td>
<td>703</td>
<td>0</td>
<td>993</td>
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<tr>
<td>I</td>
<td>Materials &amp; Articles Manufacturers &amp; suppliers</td>
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<td>1</td>
<td>1</td>
<td>0</td>
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#### Total food businesses

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<td>10</td>
<td>572</td>
<td>929</td>
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#### Inspection Frequency

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<th>Every year</th>
<th>Every 2 years</th>
<th>Every 5 years</th>
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<tr>
<td>Target due an intervention in 2013/14</td>
<td>10</td>
<td>*546</td>
<td>*423</td>
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* Please see comments Section 3.1 in relation to our approach to targeted interventions

---

**Food Hygiene – Premise / Work Profile 2013/14**

---

48
<table>
<thead>
<tr>
<th>Code</th>
<th>Establishments</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
<th>E</th>
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<td>101</td>
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<td>5</td>
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<td>9</td>
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<td>105</td>
<td>Supermarket/Hypermarket</td>
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<td>11</td>
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<td>4</td>
<td>3</td>
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<td>Catering establishments</td>
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<td>26</td>
<td>13</td>
<td>50</td>
<td>137</td>
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<td>114</td>
<td>School/College</td>
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<td>6</td>
<td>53</td>
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<td>Mobile food unit</td>
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<td>15</td>
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<td>3</td>
<td>36</td>
<td>12</td>
<td>17</td>
<td>68</td>
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**Total due an intervention in 2013/14**

|                      | 3  | 98 | 423 | 202 | 131 | 857 |

**Inspection Frequency**

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<thead>
<tr>
<th></th>
<th>6 months</th>
<th>12 months</th>
<th>18 months</th>
<th>24 months</th>
<th>36 months</th>
</tr>
</thead>
</table>

- The number of targeted interventions for food standards and food safety differ, due to the different risk rating required by the Food Standards Agency.

**APPENDIX 5**

**FOOD STANDARDS TEAM**
SAMPLING PROGRAMME FOR 2013/2014

In order that the Food Standards Team can react to local and national events and projects in order to provide the most effective sampling possible the numbers of samples to be taken are not specified in the Service Plans. The sampling budget for 2013/14 is £10 000, but we will make use of examination of informal samples (such as spirits) by brand holders and funding opportunities, wherever possible, to extend our budget. It is anticipated that the numbers sampled taken will be approximately:

30  Formal Samples
50  Informal Samples

These will include:

- Samples connected to a consumer complaint
- Samples of products produced by businesses for which we are the Home Authority
- Samples taken from factories during routine inspections
- Samples following a formal food hazard warning
- Samples to obtain data for use in connection with business and consumer education
- Samples taken as part of a local, regional or national programme

Priority will be given to sampling food produced by local traders and in areas where a problem has been identified by the team or nationally.

The team will also undertake a number of food labelling checks of product from High Risk / Manufacturing Premises and as part of the identified ‘in-house’ sampling for identification of the need for officers to provide advice and guidance to business about labelling issues. Similarly in house testing of spirits utilising will continue to be a part of our routine work, as well checks on the labelling and traceability of products.
FOOD SAFETY TEAM -
SAMPLING PROGRAMME FOR 2013/2014

North West Regional, (Cumbria, Merseyside, Lancashire, Greater Manchester) Sampling
Surveys (Organised by Health Protection Agency):

May to August 2013

- Microbiological examination of ready-to-eat pre-cut fruits from retail, catering and res- taurant premises
- Microbiological examination of plain soda water from dispensers
- Microbiological Hygiene and Safety Study of Catering Premises
- Microbiological Hygiene and Safety Study of Residential Care Homes may also in- clude sampling of water for legionella
- Microbiological sampling of beef/tongue

Other regional sampling programmes from August have not yet been received.

St Helens Environmental Health local surveys throughout the year:

- Ready to eat foods from Approved Premises (10)
- Cooked meats (20)
- Mobile caterers food and swabs (20)
- Paté (10)
- Made to order sandwiches/salads (10)

Other samples will be taken as necessary, following complaints or other incidents.

All sampling is funded and analysis undertaken by the Public Health England, Preston Laboratory, by a regional credit system.
APPENDIX 6

FOOD STANDARDS TEAM -
ESTIMATION OF RESOURCES FOR 2013/14

To achieve the inspection as shown in appendix 4, each officer will work to individual targets, which will reflect the officers’ skills and experience/qualification. Individual targets will also take into account the workload of officers in other Trading Standards areas, such as Safety, Metrology and Fair Trading, as the same officers enforce these areas of legislation.

The average workload, at current staffing levels, would be:

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>High Risk Inspections</td>
<td>4</td>
</tr>
<tr>
<td>Medium risk Inspections/ interventions</td>
<td>182</td>
</tr>
<tr>
<td>Low Risk Inspections</td>
<td>141</td>
</tr>
<tr>
<td>Consumer Complaints</td>
<td>15</td>
</tr>
<tr>
<td>Requests for business advice</td>
<td>4</td>
</tr>
<tr>
<td>Home Authority referrals</td>
<td>3</td>
</tr>
<tr>
<td>Formal/Informal Samples</td>
<td>27</td>
</tr>
</tbody>
</table>

It is intended that the majority of the low and medium risk premises will be dealt with through a targeted intervention, rather than an inspection and we will continue to utilise alternative means to the physical inspection of the premises, such as the use of Self Assessment Questionnaires or visits by non-qualified officers for low risk businesses.

We intend to continue to nurture good relationships with our businesses, to be able to provide advice and prevent problems before they occur, reducing the need for time and resource consuming enforcement actions.

FOOD HYGIENE TEAM -
ESTIMATION OF RESOURCES FOR 2013/2014

To achieve the inspection plan as shown in Appendix 4, each inspector will work to individual targets amongst the team the following is an estimate of the anticipated workload:

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<table>
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<tbody>
<tr>
<td>High Risk Inspections (A-B) (A's inspected twice a year)</td>
<td>106</td>
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<tr>
<td>Low Risk Inspections (C-E)</td>
<td>782</td>
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<tr>
<td>Food Complaints</td>
<td>380</td>
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<tr>
<td>Infectious Disease Investigations</td>
<td>165</td>
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<tr>
<td>Revisits</td>
<td>400</td>
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Other areas of work will be dealt with by the Team as detailed in the Food Service Plan include,

- Advice to businesses
- Sampling
- Food Standards Agency Food Alerts
- Liaison with other Agencies
- Food Safety and Healthy Eating Promotion
- Training and coaching food safety
APPENDIX 7

TRAINING PROGRAMME 2013/14

All officers will receive training so as to enable them to comply with the requirements of the Code of Practice, which states that a minimum of 10 hours CPD type training will be given to all food safety officers and food standards officers each year.

Food Safety Officers

The following areas of training will be dealt with during the coming year, some by shared low cost training with Environmental Health Cheshire and Merseyside;

- 3 day HACCP course
- FSA Update Sessions
- National Hygiene Rating Consistency Rating workshops
- A regional best practice day
- Other update courses as they become available throughout the year.

Briefings of any changes to internal Practice and Procedure Notes. When officers attend courses on any food or related issue then the appropriate cascade training will be organised so that the team will benefit.

Food Standards Officers

As opportunities arise, the following training will be dealt with during the coming year:

- Current issues in Food Standards/Labelling
- Imported Foods
- Food Labelling
- Health Claims
- Legal Processes

When officers have attended courses on any food or related issues then the appropriate cascade training will be organised so that the team will benefit. Training needs have been identified through our appraisal system, the monitoring of inspections, complaints and sampling and these needs will be addressed throughout the year.