

# The London Borough of Richmond-upon-Thames

## Food Service Plan 2013-2014

## **1.0. INTRODUCTION**

This plan sets out the direction and key work areas for the Food Safety Service for the forthcoming year. The preparation of this year's plan is built upon a review of previous years' targets and objectives and sets the agenda for the forthcoming year. The plan also reflects priorities for the Department and the Directorate within which the Service is set.

In a time of economic recession we have been considering our enforcement role to reduce the regulatory burden on, in particular, small businesses, looking closely at what are our priorities and our methods of work. At national we currently have a Conservative/Lib-Dem coalition Government and at local level a Conservative Council administration. The Council as a whole is under review for efficiency savings.

LB Richmond is committed at high level to commissioning or sharing services wherever possible and work is continuing on studying the feasibility of a SW London Shared Regulatory Service between Richmond, Merton and Croydon. The results may impact on the delivery of this plan.

This plan will be regularly reviewed and the targets, contained within it, closely monitored.

## **2.0 COMMERCIAL ENVIRONMENTAL HEALTH SERVICE TEAM PLAN 2013-2014**

The Commercial Environmental Health Work Plan is for the direction and use of staff within the Commercial Environmental Health team and identifies the areas we will be focussing on for the forthcoming year. The plan specifies in detail the contribution the service makes to the Divisional Plan, the Departmental Plan, the Corporate Plan and the Community Plan.

The specific Commercial EH targets are aligned directly with the corporate strategic plans. Whilst we are a multidisciplinary team covering various environmental health functions, those objectives specific to food safety are highlighted.

The Head of Consumer Protection has overall responsibility for all of the team's output but individual team members have direct responsibility for certain aspects of work within their specialism and for ensuring that targets are met. Monitoring of our progress is carried out on a routine basis and individual targets set at the beginning of the year are subject to review through the appraisal system and regular one to one meetings.

Objective	Action	Target(s)	Person responsible for achieving	Corporate Priorities (see section 4)
To operate an efficient and improving food safety service	Review the premises database, allocate inspections and monitor progress monthly	Ensure 100% of Category A & B food businesses are inspected in accordance with the FSA Code of Practice April 2012.	Kathryn Goodwin/Paul Greenop/Barbara Ruiz	Supporting Business Protecting Vulnerable People A Healthy Borough
	Implement range of interventions for prioritisation of food premises inspection to ensure a graduated enforcement approach is adhered to		Kathryn Goodwin/Paul Greenop/Barbara Ruiz	
	Review the need to engage consultants and appoint as necessary	On-going review	Laura Aston/Pauline Kirby	
	To participate in the national surveillance for counterfeit alcohol	September 2013	Shaun Case	

Improve information provided to businesses via the Council website	Regularly review and update the website content as required	On-going	Michael Eade	Supporting Business
Participate in the FSA UK Food Surveillance System to co-ordinate sampling in the UK	Use the UKFSS to plan and record sampling and to monitor results	On-going	Karen Alvey/Sarah Crouch	Supporting Business Protecting Vulnerable People A Healthy Borough
To respond to business and customer information/enquiries/complaints	To provide a business/customer enquiry service	On-going	Whole team	
To further the government's public health agenda	To build upon previous years commitments to improving nutritional standards in food available to children by participating in the London wide 'Healthy Catering Commitment' scheme	To target nutrition standards in food takeaway outlets near schools	Karen Alvey	Supporting Business Protecting Vulnerable People A Healthy Borough
To inform businesses of important legal developments and requirement	Annual CEH newsletter produced	One newsletter per year	Michael Eade	Supporting Business

To begin preparations for the Rugby World Cup in 2015	Prepare appropriate food hygiene and safety information for a range of food business types likely to be catering for a world class event	March 2014	Kathryn Goodwin/Paul Greenop/Barbara Ruiz	Supporting Business Protecting Vulnerable People A Healthy Borough
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### Working with Partners

Objective	Action	Target(s)	Person responsible for achieving	Corporate Priorities
To set up positive working links with the new Public Health Director in preparation for implementation of Public Health England 2013	Make contact with colleagues in Public Health team to agree joint working.	Annual review meeting	Laura Aston/Pauline Kirby	A Healthy Borough
To co-ordinate food sampling programme and facilitate data sharing	To work in partnership with the FSA, other boroughs, the public analyst and the Health Protection Agency to participate in the FSA UK Food Surveillance Scheme	100% data upload by year end	Karen Alvey	Protecting Vulnerable People A Healthy Borough

To devise and implement an Animal Feed Strategy	Identify food businesses likely to be diverting waste food into the animal waste stream.  Develop advisory material and a sampling programme.	December 2013	Paul Greenop	Supporting Business A Healthy Borough Working in Partnership
To maximise resources and share information with local partners	To participate in SW London Liaison Groups for food and infection control	To participate in sector group meetings as planned	Barbara Ruiz/Kathryn Goodwin/Karen Alvey	An Accountable Council
To investigate all food and water related infectious disease notifications and follow up as necessary	Liaise with GP's and HPU as necessary	On-going	Whole team	Protecting Vulnerable People A Healthy Borough

## Finance

Objective	Action	Target(s)	Person responsible for achieving	Corporate Priorities
To make best use of financial resources to provide a value for money service	To monitor and review all budget areas	Service operating within budget	Laura Aston/Pauline Kirby	A Lower Tax Borough

### 3.0 FOOD SERVICE STANDARDS

Our food safety service standards lay down what our service users can expect from us. They are based on the corporate service standards but tailored to the individual service we provide:

- We will ensure food businesses receive a detailed typed report, highlighting what action is needed to comply with the law and to meet with standards of good practice within 14 days of the inspection.
- We guarantee a personal response to telephone enquiries between 9am and 10 am, and between 4pm and 5.15pm each working day (5pm on Fridays). At other times, callers can leave a message and we will respond within one working day.
- There will be someone available at our offices to deal with personal enquiries during normal office hours. If all of our inspectors are busy, a member of the administrative team will advise callers as appropriate and relay a message to an officer. We aim to see all personal callers within 5 minutes.
- We will acknowledge all letters and faxes, other than letters relating to food complaints, and give an informed reply within 7 working days unless the issue is complex, when we will reply within 14 working days.
- We will acknowledge all e-mail enquiries to the dedicated commercial environmental health mailbox within two working days and give an informed reply within 7 working days, unless the issue is complex, when we will reply within 14 working days.
- We will respond to food alerts and other emergencies in accordance with our procedures and statutory requirements. All 'actionable' alerts will be followed up within one day.
- We will respond to all complaints relating to food and food premises, persons or practices within 2 working days and investigate within 10 working days.
- When we carry out an inspection, we will always tell you who we are, give you full contact details, explain where we are from and the reason for the visit.
- We will respond the same day if we are told about serious cases of food contamination or food related illness.

Copies of our standards are available, on the website and can be provided in Braille, large print on audio tape or in a community language upon request.

## 4.0 CORPORATE OBJECTIVES AND PLANS

### Links to Corporate Objectives and Plans

The Council and its partners have produced a Corporate Plan for the period 2013-2014 which sets out their ambitions for the local area. Their vision is to be the best and safest borough to live in London, one identified by its green character, historic buildings, high quality appearance, vibrant high streets and outstanding schools and services, one where businesses can thrive and citizens can help change neighbourhoods for the better, supported by an enabling council commissioning excellent value for money services

The Food Service Plan forms part of the Commercial Environmental Health Service contribution to the Development and Street Scene Service Plan. It has been prepared to deliver the key strategic objectives set out in the Corporate Plan for 2013-2014 and translates these into service action plans which are subsequently used for individual and team target setting.

The Food Safety Service plays an important part in helping the Council to meet its objectives. It is a front line service assisting our food business community in achieving the highest levels of food hygiene and standards, thereby protecting public health. Through targeted advice, education and enforcement we endeavour to enhance this sector's business competitiveness and enterprise.

The council is a business, working on behalf of the local community and, like all businesses, must respond to the changing environment to ensure it continues to deliver on its priorities. The key drivers and management priorities underlying the way we will deliver our priority services are to focus on:

#### People

- Protecting the most vulnerable: choice in service
- A healthy borough: Integrated care
- The best schools in London: New schools and places

#### Place

- A Green Borough: Local Diversity and Quality Planning
- Supporting Business and the Arts: A new charity
- A Borough open to visitors: Fair Parking
- A Safe Borough: Tackling Crime

#### Resources

- Putting people first: a lower tax Borough
- An accountable council: Open information
- Involving our community
- Fairness for all



## **5.0 BACKGROUND**

### **5.1 Profile of the London Borough of Richmond upon Thames**

- The London Borough of Richmond upon Thames covers an area of 5,095 hectares (14,591 acres) divided into 18 electoral wards
- It is the only London Borough spanning both sides of the river Thames, with river frontage of 21.5 miles. A significant area is Royal parkland, other public gardens and the country's only urban wetland wild bird sanctuary.
- The Office of National Statistics estimates the population to be approximately 187,000, an increase of 8.7% since 2001
- 15.4% of the population are from non-white ethnic groups - and over 70 different languages are spoken.
- 2.1% are aged 85 or over and 13.4% aged below 10.
- Richmond is one of the least socially deprived London Boroughs and most prosperous economically.
- There are in the region of 3000 commercial premises. Of which 1705 are food premises.
- There are two main commercial centres, Richmond and Twickenham, with a number of smaller commercial neighbourhoods.

### **5.2 Organisational Structure**

The structure of the Council administration is the Leader and Cabinet model. This means that the Leader of the Council is appointed for four years and subsequently appoints his or her own Cabinet. It also means that some decisions could be delegated to local committees or ward councillors. The current administration is Conservative led.

Within this structure, Commercial Environmental Health, including the food service reports to Councillor Virginia Morris, Strategic Cabinet Member for Environment, Planning, Parks and Highways.

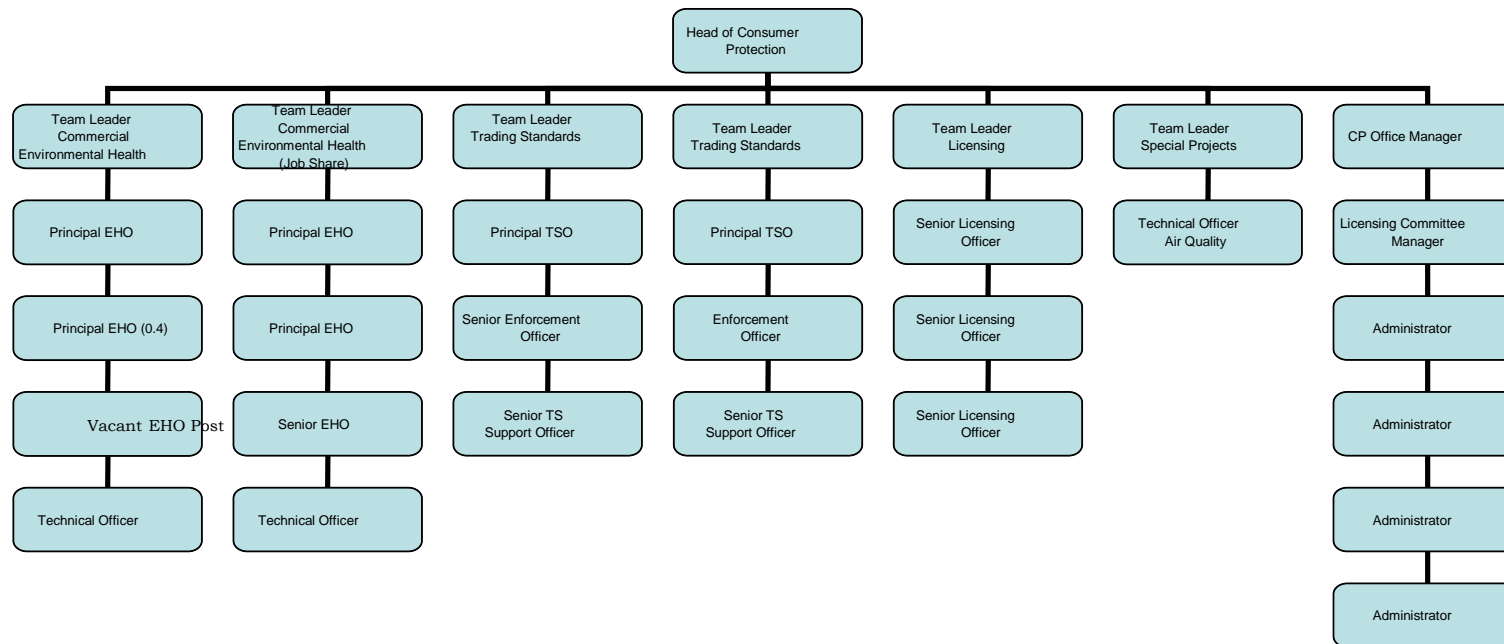
As part of the Efficiency Programme brought about by Government budget cuts, the Council instigated a number of reorganisations in the spring of 2011. In the Environment Directorate there were substantial changes Development and Enforcement section where four manager posts were deleted and replaced with one Head of Consumer Protection.

The Head of Consumer Protection reports to the Assistant Director of Development and Street Scene and is currently filled on a job-share basis, operating a split week. The Commercial Environmental Health Team is divided geographically with officers carrying out general environmental health duties, including food safety, apart from one officer who deals only with pollution and related matters. All Principal/Senior/Environmental Health Officers have expert knowledge and hold specialist portfolio roles.

Also as part of efficiency savings, our administrative team was disbanded in March 2011. Administrative support now falls to a much less specialised general admin team serving all components of the Environment Directorate, so the food service has no dedicated admin support.

The Council's appointed food analysts/examiners are Public Analyst Support Services Ltd (PASS), based in laboratories in East Acton, West London. Public Health England food and water laboratory at Colindale, London NW9, also carries out microbiological sampling, with samples being collected by their appointed courier service.

# Consumer Protection



The Commercial Environmental Health team deal with all environmental health matters arising from commercial premises. Anything relating to residential premises is dealt with by the Residential Environmental Health Team which is located in the Adult and Community Services Directorate. There are well-established links with this team and some joint working.

### 5.3 Scope of the Food Service

As part of its broad range of work, the Commercial Environmental Health Team has responsibility for the inspection of food premises. This is a 'generalist' team carrying out the entire range of commercial environmental health functions and services, including food hygiene, food standards, food sampling, food complaints, animal feed, health & safety, noise and odour abatement work relating to commercial premises, and infectious disease investigations.

### 5.4 Health Improvement/Promotion

Efficiency cuts in previous years resulted in the deletion of the Health Improvement Team.

Our primary aim remains to educate and encourage food business proprietors and staff who are under-trained in food hygiene. There are sources of training available locally, including Richmond Adult Community College, and online but training is regrettably no longer offered in-house. We currently produce a general environmental health newsletter, which incorporates food safety matters.

### 5.5 Food Premises Profile

The following table gives a breakdown of the different types of the food premises within the borough. There is a continual turnover in the food sector so these figures are constantly changing with new businesses opening and others closing:

Primary Producers	2
Manufacturers & Packers	17
Importers/Exporters	3
Distributors/Transporters	3
Supermarket/Hypermarket	29
Small Retailer	260
Retailer - other	41
Restaurant/Café/Canteen	435
Hotel/Guest House	22
Pub/Club	174
Take-away	77

Caring Premises	328
School/College	83
Mobile Food Units	51
Restaurant & Caterers - other	183
TOTAL	1705

The majority of food businesses in the Borough are small high-street licensed restaurants, unlicensed cafes and takeaways and retail shops. These consist of branches of national chains, franchises and family run businesses. A fair proportion of food businesses are owned or managed by the ethnic community, but less so than in many other London Boroughs. Four of the UK's major supermarket chains are represented in the Borough.

There are 3 fish product premises currently requiring approval under Regulation EC 853/2004:

Claude Harry  
Kings Fine Food  
Seafood and Eat It

One premises produces animal feedingstuffs as a by-product of its main role as a brewery. This was scheduled for closure but is now staying operational until at least 2014. Additionally, there are 18 branches of 3 national supermarket chains registered with us as suppliers of waste food to the animal feed stream.

## **5.6 Home Authority/Primary Authority Responsibilities**

Richmond-upon-Thames acts in an informal capacity as home authority to a number of food company administrative offices. These companies require increasing amounts of advice and information on labelling which is often time-consuming work. We do not act as Primary Authority for any business.

## **5.7 Seasonal Events**

The Hampton Court Flower Show, international rugby matches and rock concerts at Twickenham RFU, Hampton Court and Kew Gardens with the attendant catering have an acute impact on our service. Although each event is pre-planned a long way in advance, they take up a considerable amount of staffing resources. The temporary nature of each food outlet means they cannot individually form part of the annual inspection programme because different food vendors operate at each event. Nevertheless, inspections are undertaken, records are kept and updated. We have an events strategy for targeting our resources appropriately.

Wherever possible, food enforcement work at events is combined with other environmental health functions, such as health and safety and noise monitoring. This enables us to make best use of resources and provide a better service to our customers.

## 5.8 Forthcoming Challenges

The Service faces a number of important challenges over the next year, which it will look to respond to positively. In common with other food safety services the demands that are placed on this service have grown considerably over the past few years. We need to ensure that these demands are properly prioritised to ensure our resources are deployed to their optimum. We recognise there is a need to ensure that the services we provide are:

- Customer focused and responsive to our stakeholders
- Meeting the standards prescribed by codes of practice and legislation and in keeping with the principles of better regulation
- Assured in terms of Service Quality
- Open and information rich
- Demonstrating value for money
- Available interactively through the Council website

Our focus in 2013-2014 will be to improve the service we provide through:

- Building on our relationships with business
- Continuing to improve accessibility and information available via our website
- Continuing to build on flexible working, home-working and making better use of new technology.
- Refining our training and staff development through needs assessment of the service and the individuals in accordance with our Performance and Development scheme
- Continuing to develop the current system of core competencies and extending to all of our activities through the reinforcement of officer portfolio roles and expertise
- Continuing to integrate and reinforce the principles of the Regulator's Compliance Code into our work
- Continuing to promote Safer Food Better Business, where appropriate, and to advise on other food safety management and HACCP systems elsewhere
- Ensuring that our services remain customer-focused, seeking through further consultation to improve the service we provide

- Implementing food safety enforcement interventions and refining our alternative enforcement strategy for low risk food premises to enable us to target our resources at businesses likely to present a higher risk to public health and safety
- Continue participation in the London wide Healthy Catering Commitment
- To implement the action plan required by a Food Standards Agency audit of Richmond's Food Safety Service in 2012
- To develop an animal feed strategy in response to the rising numbers of food premises diverting waste food into the animal feed stream.
- Begin preparations for the Rugby World Cup in 2015

### 5.9 Inspection Targets

Category A	4
Category B	89
Category C	464
Category D	154
Category E	167
Unrated premises at year start	316

The target of 100% of high risk inspections to be achieved for Category A & B inspections =  $89 + 4 = 93$

Being a generalist team, it is difficult to apportion the proportion of each officer's time on food work. In addition to undertaking programmed inspections, officers also deal with food standards work and food and food premises complaints.

Another complicating factor in working out staff resources for inspections is that we make bids for funding for contract EHP assistance at various times through the year rather than at the start of the year. So we cannot assume we will always have this assistance at the start of the year.

We have estimated that the officer time available in-house for food related work is 2.8 FTE. The vacant EHO post is currently being filled by a contractor 4 days each week who works similarly to other officers, doing food related work as well as other EH work. This contract is reviewable every twelve weeks. Should we maintain this contract for the forthcoming year this would then give us a FTE of 3.2 officers for food related work this year.

In order for us to achieve this years works targets we have estimated that we will need 3.64 FTE's (see detail in tables in 6.2 and 6.3), as well as 0.42 FTE for administrative and ancillary food related work, a total of 4.06 FTE's. This leaves a shortfall of 0.86 FTE EHP's, if we manage keep the temporary contract EHP all year, and a shortfall of 1.26 FTE's if we are unable to retain the temporary EHP.

<b>Activity</b>	<b>Hours Required</b>	<b>FTE Required</b>	<b>FTE Available</b>
Food Hygiene	3641	2.19	
Food Standards	1331	0.8	
Food Complaints	360	0.22	
Sampling	480	0.3	
Infectious Disease Investigation	207	0.13	
Administration	700	0.42	
<b>Total</b>	<b>6719</b>	<b>4.06</b>	<b>2.8 (3.2 with contract EHO)</b>

This shortfall will clearly impact on our ability to fulfil all of the inspections due this year, and/or impact on other areas of our work.

(e.g. we would be unable to carry out any Category C inspections which would be carried forward into 2014-15, thus starting that year with a backlog of overdue inspections)

Our work is scrutinised by the Food Standards Agency. One of the many areas of work scrutinised is whether we manage to achieve our inspection targets. A backlog of overdue inspections increases the chance of a detailed audit.

In addition, we carry out a programme of Food Standards inspections and sampling as well as reactive food work such as complaints and allegations of food poisoning, investigations of food-related infectious disease and provide advice to businesses. The reactive work is clearly customer led, and therefore difficult to predict what resources will be required.

As a generalist team, we have to be flexible. An example would be an EHP having to spend many hours preparing a prosecution, therefore colleagues would be expected to take on some of the planned work off that EHP.

## **5.10 Service Availability**

The Food Service is based at the main Civic Centre. Normal office hours, during which customers may call by telephone or in person, from 9am to 5.15pm Monday to Thursday, and 5pm Friday. Appointments between customers and officers can be made outside these hours by mutual agreement.

Contact can be made with the Food Service via the following means:

By telephone: 020 8891 7117  
By fax 020 8891 7713  
By email [commercialeh@richmond.gov.uk](mailto:commercialeh@richmond.gov.uk)  
Website [www.richmond.gov.uk](http://www.richmond.gov.uk)

In person at the above times: Civic Centre, 44 York Street, Twickenham TW1 3BZ

Some food inspections can only be carried out in the evening or on Saturdays and Sundays, because the business does not open during our normal office hours. The Unit currently has an overtime budget for this purpose and officers make provision for evening and weekend visits throughout the year.

Food Alerts are received by e-mail and text message to the out of hours standby officer providing full details of the alert for action as appropriate, to the Commercial Environmental Health Food Standards Agency mailbox and also to individual officers mailboxes. There is a documented procedure for action to be taken when food alerts are received, both during and outside office hours. Food alerts are monitored and action initiated by the team leaders.

Infectious disease outbreaks are co-ordinated by the CCDC for the SW London Health Protection Team currently Dr Barry Walsh and a locum CCDC service for Richmond. There is an Outbreak Plan that the CCDC oversees. This contains all up to date contact details of appropriate environmental health and Public Health England staff in Richmond and neighbouring boroughs.

Our out of hours service has been operational since April 2002, which enables the Commercial Environmental Health Unit to offer a 24 hour emergency response system for dealing with major food alerts, suspected food hazards and infectious disease outbreaks. This is a means of providing a formalised, consistent and continuously available service, whereby officers are on-call outside normal office hours. The duty officer can be contacted through a dedicated mobile phone, which also receives text messages from the FSA on current food alerts

### **5.11 How the Food Service Cares for People with Special Needs**

Our officers spend the majority of their time visiting premises and persons in their own homes. This overcomes any difficulty visitors may have in getting to our offices. There are private interview rooms at our offices where our users can conduct conversations with others in relative privacy.

Disability awareness training and use of the text phone is carried out for all members of staff. There is also a facility available for production of documents in Braille or as audio cassettes, if required.

We have access to interpretation facilities and subscribe to a language translation service. We supply information and a range of leaflets in ethnic languages. Where there is demand we are able to arrange for food hygiene and safer food better business training in foreign languages, either directly with a trainer or in partnership with a neighbouring local authority.



## **5.12 Enforcement Policy**

The Council is a signatory to the Compliance Code. The Commercial Environmental Health Unit has its own enforcement policy including food law enforcement. We work closely with the Department's other service managers within the Department to achieve a consistent approach.

We have a stepped approach to enforcement, seeking initially to advise businesses of their legal duties, but taking appropriate enforcement action where this is necessary. During the year April 2012 to March 2013, we served 6 Food Safety Act Improvement Notices, 2 premises closed voluntarily.

## **5.13 Demands on the Food Service**

There are demands placed upon the food service from both external and internal sources. As we are a generalist team the priorities of all aspects of environmental health issues have to be met. We are dealing with noise and smell complaints, health and safety issues, including smoking, planning and licensing consultations as well as food-related matters, including complaints and infectious disease notifications, all in the context of providing a value for money service and meeting high service standards.

National initiatives, such as Safer Food Better Business and the migration to the Food Hygiene Rating Scheme from Scores on the Doors had a significant impact on our limited resources in 2012-13. The administration and overseeing the move to FHRS was more onerous and time consuming than originally anticipated. With a loss in staff dealing directly with food premises and administration staff dedicated to the service there has been a knock on effect on other areas of the service. We do, however, remain committed to both of these initiatives, which we believe play an invaluable part in raising food hygiene standards.

In addition to the migration to FHRS, we were required to undertake a number of special educational and coaching visits to premises in connection with the Olympic Games, of which Richmond hosted some events. These visits created a great deal of time consuming administration at an already busy time of the year.

A significant amount of officer time was also invested in inspection of our three approved food premises.

Despite this, the dedicated staff managed to only just fall short of our inspection targets.

The number of high risk premises (Category A & B) premises due this year has fallen from 2012-13, indicating an overall improvement in standards as a result of our intervention.

## 6.0 SERVICE DELIVERY

### 6.1 Food and Feedingstuffs Premises Inspection/Intervention

The Commercial Environmental Health Team endeavours to carry out food hygiene and food standards interventions in accordance with the frequency set out in the relevant Codes of Practice.

We start 2013-14 with 15 branches of 2 national food retailers registered with us under Animal Feed legislation, to divert waste food from their in-store bakeries into the animal feed stream. We expect more premises to register this year as animal feed establishments. The Stag Brewery has been registered with us for several years. As a result of this increased area of work, we plan to advise more businesses of their obligations if they divert waste food into the animal feed stream.

During 2012-2013 a total of 138 category A & B premises, 450 category C premises and 257 low risk premises (categories D-E) and 97 unrated premises food hygiene interventions were undertaken.

Additionally, there were 126 food samples taken from premises and 2 food complaint visits were made. We received and dealt with 41 for food hygiene and 24 for hygiene of the premises.

On 1 April 2009 the FSA introduced a new way of working for local authorities carrying out the food safety role to allow LAs to consider a variety of different ways of approaching food safety enforcement at the establishments in its area. We have found that this has given us greater flexibility to focus our resources on those premises in greatest need by using a suite of interventions and a less rigid programme of action.

### 6.2 Food Hygiene Premises Interventions

The Council has adopted the priority planning system based on the recommendations in the Food Safety Act 1990 Code of Practice (as revised). This determines the risk rating for each premises based on the type of food handled, the size of the business and how well it is managed. In turn the risk rating determines the frequency of intervention as follows:

<b>Risk Category</b>	<b>Intervention at Intervals not less than</b>
<b>A</b>	6 months
<b>B</b>	1 year
<b>C</b>	18 months
<b>D</b>	2 years
<b>E</b>	3 years or alternative enforcement strategy

CATEGORY	NUMBER OF INTERVENTIONS PLANNED	AVERAGE HOURS PER INTERVENTION	TOTAL HOURS REQUIRED (BASED ON PLANNED WORK)	FTE (1656 hrs per year)
A (High Risk)	4	6	24	
B	89	5	445	
C	463	4	1852	
D	154	2	308	
E	158	2	316	
Unrated*	174	4	696	
<b>TOTAL</b>	<b>1042</b>		<b>3641</b>	<b>2.19</b>

\* Figure given for unrated premises comprises 158 mainly small retailers and home caterers and 16 childminders (10% of all unrated childminders that are considered higher risk due to higher number of children catered for and will be prioritised for inspection)

### 6.3 Food Standards Interventions

The Council has adopted the priority-planning scheme based on the recommendations of Code of Practice (as revised). This determines the risk rating for each premise to determine its programme of intervention. The risk category is calculated in a similar way to the food hygiene interventions and is based on the effectiveness of the business quality systems, the number and volume of production lines, the type of product and the previous record of the business.

Risk Category	Intervention Interval
High	1 year
Medium	2 years
Low	5 years or alternative enforcement strategy

CATEGORY	NUMBER OF INTERVENTIONS REQUIRED	AVERAGE HOURS PER INTERVENTION	TOTAL HOURS REQUIRED (BASED ON PLANNED WORK)	FTE (1656 hrs per year)
High Risk	2	4	8	
Medium Risk	199	2	398	
Low Risk	233	1	233	
Unrated	346	2	692	
<b>TOTAL:</b>	<b>780</b>		<b>1331</b>	<b>0.8</b>

CATEGORY	NUMBER OF INTERVENTIONS REQUIRED	AVERAGE HOURS PER INTERVENTION	TOTAL HOURS REQUIRED (BASED ON PLANNED WORK)	FTE (1656 hrs per year)
Complaints	90	4	360	0.22
Sampling Visits	120	4	480	0.3
Food-related ID Investigations	138	1.5	207	0.13
<b>TOTAL:</b>				<b>0.65</b>

We continually look at our database to ensure its accuracy and have introduced regular monitoring checks. We continue to work on the recommendations of the FSA audit of our monitoring returns and are very pleased with the improvements we are continuing to see.

#### 6.4 Revisits

Revisits are no longer recognised in the interventions monitoring system although we continue to undertake to return to those premises where the officer considers conditions found at the time of initial inspection warrant it. These may take the form of any of a number of the specified interventions, depending upon the specific conditions or problems noted by the inspecting officer. Premises that achieve a rating of 0 or 1 under the Food Hygiene Rating Scheme are automatically scheduled for a revisit.

In 2012-2013 we carried out 28 verification visits, 1 surveillance visit and 3 monitoring visits, totalling 32 visits in addition to the programmed visits.

## **6.5 Food and Feedingstuffs Service Requests**

There is a Council prescribed response time of 2 days for all food complaints. The investigation procedure is based on guidance provided by LACORS/Local Government Regulation.

The Commercial EH Team will raise relevant issues with suppliers, retailers and Home or Primary Authority partners (as necessary) in order to establish any possible offences and defences under the Food Safety Act 1990 or other legislation. The investigating officer shall keep the complainant informed as the investigation progresses.

Overall the CEH Team received 1362 requests for service in all areas of Commercial Environmental Health work, excluding calls made to the week-end noise team, between April 2012 and March 2013. Of these 220 were food-related, 116 relating to food registration enquiries and none relating to feedingstuffs.

We had one major Clostridium perfringens outbreak at the end of March, the investigation of which continued into April, ie the current year.

## **6.6 Home Authority/Primary Authority Work**

Richmond-upon-Thames acts in an informal capacity as Home Authority to several food companies whose administrative offices are based in the Borough. These companies from time to time require advice and information on labelling, which can be very time-consuming work. The companies are:

- **Stag Brewery** – a large-scale international company and the manufacturer of all the bottled Budweiser and 'Bud Ice' sold in the UK and Europe
- **PepsiCo Drinks** - UK administrative headquarters for PepsiCo, a multinational food company
- **Greggs Bakery** - a medium-sized regional baker.
- **Graze** – the head office for a new 'healthy snack' producer

In addition, the offices of a number of small independent importers and exporters are located in the Borough. The bulk of the Home Authority work relates to food labelling queries, complaints and interpretation of the UK food labelling legislation either directly from customers or from other 'originating' authorities.

## **6.7 Advice to Business**

The Council is committed to supporting and assisting local businesses, which it does by providing education and advice. This is demonstrated in the following list of initiatives currently in operation:

- EHO advice to prospective food businesses at the planning application stage.
- Site meetings with prospective/new proprietors to discuss food hygiene requirements
- Further development of website
- The publication of a regular newsletter for all registered food businesses in the Borough.
- Continual review and improvement of our website and facilities to communicate electronically.

## **6.8 Food and Feeding Stuffs Inspection and Sampling**

The Food Team undertakes food sampling on a routine, planned basis. There is an annual sampling programme agreed by the SW London Food Liaison Group in conjunction with the food and water laboratory at the Public Health England laboratory in NW London and the public analyst/food examiner at Public Analyst Scientific Services Ltd (PASS). The programme is a combination of chemical, microbiological and standards sampling. The Food Team also participates in LACORS and EU food sampling plans. For 2013-2014 an in-house sampling programme has been developed and the Borough sampling policy and procedure updated accordingly.

During the year a total of 124 food samples were analysed. Of these 61 were taken formally and 55 informally, the remainder being complaint or other samples. The Unit has a food-sampling budget of £9300. Additionally we receive an allocation from the Health Protection Agency for microbiological sampling. Responsibility for managing the sampling portfolio is delegated to one of the Principal EHO's and a technical officer assists with sampling.

The Public Health England food and water laboratory at Colindale, Northwest London, carries out microbiological examination. There has been a recent change in the structure of the HPA, and as a consequence, sample transportation has been reviewed. This means that the HPA has appointed a courier service to collect all routine samples on an allocated day each week. There is consequently a need for good organisation, clear identification of samples, effective temperature control and accurate temperature monitoring. All of our monitoring equipment is regularly calibrated.

Chemical formal and food standards samples are all analysed by the appointed food analyst, Mr Jeremy Wootten at PASS Ltd. at their laboratory in Acton, NW London.

As part of the Animal feed Strategy we plan to implement this year, we will set up a sampling programme, to include Stag Brewery, as the biggest producer of waste food.

## Planning

National microbiological sampling initiatives to be coordinated by Local Government Regulation (LGR) / Public Health England during 2013-2014 are summarised below. Detailed protocols for the new studies will be circulated at least one month before the start of each study.

We have devised, with colleagues in our Food Sector Group, a sampling programme for 2013-2014 as follows:

### London Borough of Richmond Planning Chart for LACORS / HPA Microbiological / In-house Sampling Programme in 2013-2014 (April to October only – sampling for remainder of the year to be decided)

	<b>Microbiological</b>	<b>Chemical</b>
<b>April</b>	Dishwasher hygiene and soda guns (PHE)	School meals beef speciation (Richmond only)
<b>May</b>	Garlic mayo and dips at kebab shops (Protocol - Sutton)	'Value' tinned beef products (Richmond only)
<b>June</b>	Markets soft cheeses and dairy products (Protocol - Lambeth)	Markets pickles and chutneys (Lambeth)
<b>July</b>	Ice-cream (Protocol - Lambeth)	Ice-cream colours (Lambeth)
<b>August</b>	Herbs and leaves (Protocol - Merton)	Tonic drinks (Protocol - Kingston)
<b>September</b>	Rare burgers (Protocol - Wandsworth)	Cooked meats -nitrates and nitrites (Protocol - Wandsworth)
<b>October</b>	Serving boards (Protocol - Richmond)	Peanut butter (Protocol - Richmond)

Sampling in relation to complaints, food poisoning outbreaks and food contamination incidents will take priority over the sampling programme. Consideration will also be given to any emerging food safety issues or legislative changes and additional sampling undertaken where considered appropriate and targeted to local issues.



## **6.9 Control and Investigation of outbreaks in food-related infectious disease**

The objective of the Commercial Environmental Health Team is to investigate all appropriate cases or suspected cases of food borne disease (food poisoning and food-borne illness) and non-food borne infection notified to it either via GP, hospital referral or in response to a complaint or allegation from a 'patient'. Legislation and the Consultant in Communicable Disease Control (CCDC) determine the 'appropriate cases' for investigation.

The majority of investigatory work is done by telephone by EHOs and Technical Officers with the 'patient' for reasons of expediency. Pro-forma questionnaires, produced in conjunction with neighbouring authorities and the South West London Health Protection Unit, are used depending on the infection being investigated. Reference is also made to a regularly updated book on communicable diseases and the Department of Health 'Fitness to Work' document. Appropriate advice on control measures etc. is given to the patient. The CCDC makes visits to the Commercial EH Unit to run through the investigated cases and results. Any necessary 'follow up' work is identified and trends or links between cases that may be evolving are explored. More administration now is carried out by the investigating officer as a result of the reduction in administrative support to the team.

The number of cases and suspected cases of infectious diseases notified to the Unit in 2012-2013 was 120.

There is a Council-prescribed response time of 1 day for cases of infectious disease and food/suspected food poisoning.

An out of hours emergency contact system enables us to be contacted 24 hours a day, 7 days a week, in response to infectious disease outbreaks. An officer of the Commercial EH Team holds a dedicated phone for one week on a rotational basis and can be contacted by the CCDC.

## **6.10 Food Safety Incidents and Food Alerts**

The Borough has an overall Emergency Plan compiled by the Borough Contingencies Team. There is also a Departmental Emergency Plan which includes specific responsibilities of CEH. These documents contain contact details of all Environmental Health staff. The CEH Team has the facility to respond to Food Safety Incidents and Food Alerts occurring at any time and subscribes to mobile phone alert system operated by the CIEH. This provides a warning that an Alert has been issued by the Food Standards Agency. There is a documented procedure for responding to these.

Any Alert during office hours prompts a Commercial Environmental Health Team Leader to download the warning from the computer. The Team Leaders then makes a decision as to what, if any, action is required based upon guidance issued in the alert. The Alerts are categorised by the Food Standards Agency before transmission into those requiring action and those for information only.

All field officers are contactable by mobile telephone should their assistance be required to action the Alert, e.g. to telephone or visit food outlets. The environmental health computer database – Civica APP - is able to produce a 'bulk mailing' to any type(s) of food business, should it be decided that a 'mailshot' is the most appropriate response to a Food Safety Incident or Food Alert. We maintain a close working relationship with the Press Office to facilitate the dissemination of information via the local media. Electronic copies of all Alerts received are kept, together with details of all actions taken. Details of actions taken specific to particular premises are also kept on the Civica APP database record.

Any Alert received outside normal hours will be assessed for action and co-ordinated for response by the duty EH officer.

### **6.11 Liaison with Other Organisations**

The Head of Consumer Protection and Team Leaders liaise with the Food Standards Agency, DEFRA, DoH, LACORS, CIEH, HSE, as appropriate, to achieve up to date advice and information on matters of enforcement uncertainty or consistency. In addition, all officers have unrestricted access to the Internet, in order to access the web sites of all the above organisations and others. We have a dedicated FSA mailbox for all communications from the FSA.

Other liaison arrangements exist with the following organisations:

- SW Thames Health Protection Unit (CCDC and Control of Infection Committee and Food and Water Laboratory Service)
- SW London Food Liaison Group (enforcement issues, professional standards, sampling initiatives) and through this the London Food Co-ordinating Group
- Public Health England
- Thames Water
- PASS (Public Analyst Scientific Services Ltd)
- Home Authorities
- Royal Horticultural Society (Hampton Court Flower Show)
- The Royal Parks Agency
- Town Centre Managers
- London Magistrates Licensing Forum
- Richmond Chamber of Commerce
- Association of London Environmental Health Managers
- Association of Local Government

Internally the team liaises regularly with representatives from the following Council teams:

- Planning Officers in Development Control re planning applications for food businesses and enforcement issues.
- The Trade Refuse Contracts Officer and Street Scene Enforcement Officers

- Borough Press Officer
- Licensing
- Trading Standards
- Highways
- Residential, including Pest Control
- Social Services
- Education

We are a member to the SW London Sector Food Group. This means that food issues are initially channelled through this forum. The group meets quarterly to discuss topical food safety and sampling issues and produce co-ordinated documentation and a unified approach across the area.

### **6.12 Food and Feeding Stuffs Safety and Standards and Promotion**

Due to budgetary cuts a decision has been made not to provide food safety training in-house but referrals are made to the local college provider. Oral examination is available and, where there is demand, we are able to arrange for food hygiene training in foreign languages, either directly with a trainer or in partnership with a neighbouring local authority.

### **6.13 Performance Indicators**

The Commercial Environmental Health team comply with central government requirements for data relating to food enforcement through the LAEMS return to the FSA and the FHRS (Single Data List).

Internally, quarterly reports on the number of high risk food inspections due and completed (amongst other non-food indicators) are presented to the Assistant Director of Environment at Departmental Management meetings.

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