

Directorate: Regeneration & Environment

Division: Planning, Highways and Transportation

Department: Regulatory Services

Operational Team: Consumer Protection – Environmental Health

Document: Food Standards Agency – Framework Agreement

Food Safety Service Plan : 2015/2016



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Food Safety Service Plan 2015/2016

Executive Summary

This plan fulfils the Council's obligations under the Framework Agreement on Local Authority Food Law Enforcement published by the Food Standards Agency (FSA). The FSA requires the production of an annual service plan and review for the provision of a food safety enforcement service. The plan is a public document, published on the Council website following approval by elected Council Members.

The objective of the plan is to deliver a programme of food enforcement activity, providing public confidence that food produced and/or sold in the Borough is without risk to health.

For the period 2014-2015 the Food Team have successfully maintained their target of 100% inspection of the highest risk premises for all areas of regulatory enforcement, this includes food hygiene; food standards; and health and safety.

1. INTRODUCTION

- 1.1 The food team is part of the Consumer Protection team which comprises of four professional disciplines: food safety; health and safety; trading standards and licensing. The team is part of the Regeneration and Environment Directorate.

For the purposes of the framework agreement and this report the Service Plan only refers to the work of the food officers who deliver the Feed and Food Service.

- 1.2 Food Standards relates to issue of description, labelling and composition of food. It is aimed to ensure that consumers are not misled.
- 1.3 Food Safety relates to the safety of food supplied for human consumption at all points in the food chain.
- 1.3 The purpose of the service plan is to ensure national priorities and standards are addressed, delivered locally and to provide a means of managing performance. This service plan is based on existing function arrangements, staff and resources. Any changes to the levels of staffing and resources identified will impact on the level of service provided. The service plan directs individual officer performance which is regularly monitored and reviewed.
- 1.4 For 2015/2016 the Food Standards Agency Food Crime Unit have identified the following priorities which Enfield will aim to support:
- Company ID theft
 - Livestock theft & illegal slaughter
 - Mislabelling of food
 - Counterfeit illicit alcohol
 - Sale and supply of food destined for animal feed.

2. SERVICE AIMS AND OBJECTIVES

- 2.1 The Council's vision is to make Enfield a better place to live and work, delivering fairness for all, growth and sustainability and stronger communities. The Council recognises that its food safety regulatory function plays an important role in maintaining and improving public health. It is committed to ensuring that all food sold within the Borough is safe and without risk to health.

2.3 Corporate Objective, Plans and the Regulator's Code

- 2.3.1 The team supporting the principles of the Better Regulation Delivery Office [Regulator's Code](#) (July 2013) and the corporate priorities:

i) Fairness for All

- Working with businesses and partners to create a fair and equitable trading environment.
- Trained, competent and professional staff.
- Use both education and enforcement as a mechanism to ensure that the production and/or sale of food across the Borough is without risk to health.

ii) Growth and Sustainability

- Supporting businesses through education, advice and targeted enforcement and best practice.
- Ensure high standards of safety and public health through monitoring of premises which are broadly compliant with food hygiene law.
- Provide business operators with training and support to assist them to comply with the law. This will include where applicable the Primary Authority and the Home Authority arrangements.
- Empower consumers to make informed choices in relation to the food they purchase and consumer. Support the [Food Standards Agency National Food Hygiene Rating Scheme](#).

iii) Strong Communities

- Empower consumers to make informed choices in relation to the food they purchase and consumer.
- Contribute to the wider public health agenda of reducing the incidence of obesity and long term health conditions such as cardio vascular disease
- Support the Council's Food Strategy "Every Bite Matters" and support the Council's Food Partnership.

3. BACKGROUND

3.1 Profile of the Enfield Council

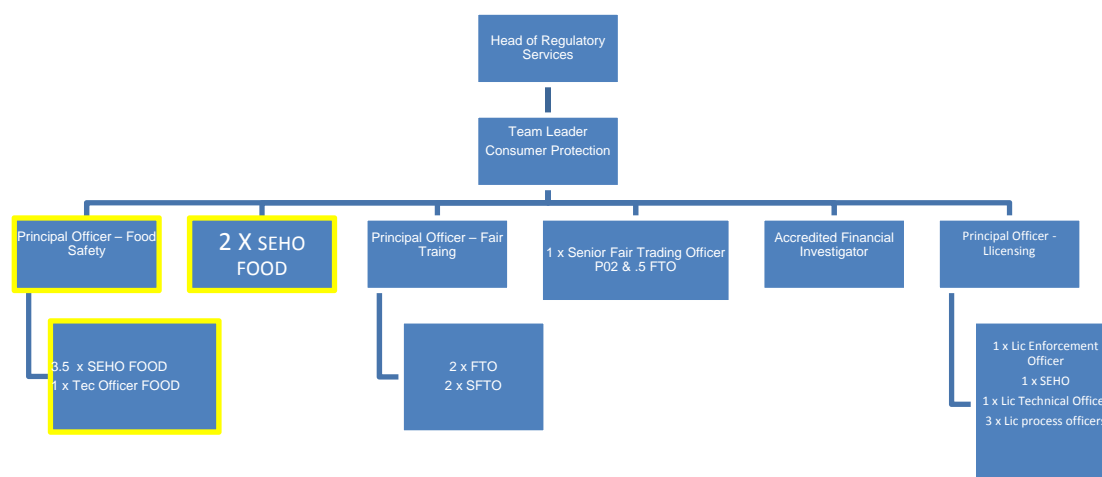
Enfield Council is an outer London Borough. It is the capital's most northerly borough and is home to a diverse community of over 320,000 people.

Further information and location details can be found on the Enfield website at www.enfield.gov.uk.

3.2 Organisational Structure

The structure of the Council Services and the Council's democratic arrangements can be found on the Council's website www.enfield.gov.uk. The

structure of the Consumer Protection Team at 1 April 2015 is detailed below. Those posts highlighted in yellow identify food posts only.



3.3 Scope of the Feed and Food Service

The team is responsible for the delivery of:

- Food hygiene law
- Food standards law
- Infectious Disease Control
- Food Sampling
- Animal Feedingstuffs
- Health and Safety
- Private Water Supplies

The service is provided to ensure the Council meets its legal obligations specified in primary legislation. This is achieved through:

- i) Interventions, for example inspections. The frequency of inspection is set out in the Food Law Code of Practice.
- ii) Demand: investigation of complaints; accidents; food poisonings etc. Not all “requests for service” are responded to, the service operates an intelligence led risk based approach.
- iii) Business support: provision of advice and guidance to local businesses and to consumers.

3.4 Specialist Service Providers

3.4.1 **Food Examiner:** Examination of food samples is undertaken on behalf of the Council by the food examiners appointed by Public Health England, Food, Water & Environmental microbiology laboratory London, 61 Colindale Ave London NW9 5EQ, that meet the qualification requirements specified in the Food Safety (Sampling & Qualifications) Regulations, 2013.

3.4.2 **Public Analyst:** Public Analyst Scientific Services Ltd , 28-32 Brunel Road, London W3 7XR provide analytical services. Duncan Arthur and Jeremy Wootten, are appointed to act as Public Analyst (PA) pursuant to the Food Safety (Sampling and Qualifications) Regulations 1990 for analysis of food labeling and compositional samples.

3.4.3 **Infectious Disease Control:** The proper officer functions for the purposes of notifications of infectious diseases has been delegated to the Consultant in Communicable Disease Control (CCDC) for Public Health England (PHE) and nominated specialist colleagues.

3.5 Demands on the Consumer Protection Team (Feed and Food Service)

The team undertakes proactive planned tasks and responds to reactive incidents. This will include complaints about food and food premises, food poisoning outbreaks; closure of food businesses; and the removal of unsafe food and/or products off the market.

3.5.1 Premises Profile.

There are approximately 2,610 registered food businesses in the borough. Each year there is a high turnover of new food businesses. The team receive approximately 300 new registrations for food businesses each year.

Year	Opened	Closed	New Premises Inspected
2012/13	625	439	358
2013/14	486	316	179

2014/15	533	289	288
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Frequency of Inspection:

Rating	Food Hygiene	Food Standards
A	at least every 6 months	at least every 12 months
B	at least every 12 months	at least every 2 years
C	at least every 18 months	at least every 5 years
D	at least every 24 months	

The FSA Code of Practice allows for Category D rated premises to be dealt with using an alternative enforcement strategy (AES) (for example self-assessment questionnaires) as a way of managing inspections and resources. We have not found the use of AES to be the most effective use of resources. Where resources permit Category D inspections will be triaged and allocated for inspection. Category D premises will be inspected where sufficient information/intelligence identifies a particular food hygiene/standards related issue.

From 1/4/15 those new business which we assess as posing low/no inspectable risk will be logged onto the database but will not receive an inspection. They will be provided with food safety information by email. These premises are given an EH Main use code of N. This allows the Authority to identify the premises if required. Examples of premises coded N include cake makers from domestic premises; food banks and sports clubs. However, should we receive intelligence or a complaint about the business – an inspection may be undertaken.

Food Hygiene : The following table shows the breakdown per MAFF category and risk rating for food hygiene for 2014/2015.

MAFF Code	Risk Rating					Outside	Unrated	Total
	A	B	C	D	E			
A- Primary Producer	0	0	0	0	0	0	11	11
C- Manf/Packer	3	8	7	18	6	16	4	62
E- Importer/exporter	0	1	4	7	10	3	3	28
F-Distributors/Exporter	0	0	4	21	31	3	12	71
G01- Retailer	0	1	1	27	23	0	0	52
G02	0	15	72	171	165	0	16	439
G03	0	2	3	22	93	0	7	127
H01- Restaurant/Café/Canteen	6	69	164	123	33	0	23	418
H02	0	0	1	5	7	0	0	13
H03	0	7	20	74	87	0	19	207
H04	7	60	87	52	4	0	19	229
H05	1	25	30	38	49	0	3	146
H06	1	24	48	42	11	0	4	130
H07	0	5	9	28	26	0	10	78
H08	3	32	56	77	146	0	41	355
Total	21	249	506	705	691	22	172	2366

The following table shows the breakdown per MAFF category and risk rating for food standards for 2014/2015.

	Risk Rating			Outside	Unrated	Total
	A	B	C			
A- Primary Producer	0	0	1	9	1	11
C- Manf/Packer	4	40	3	0	24	71
E- Importer/exporter	4	15	3	1	9	32
F-Distributors/Exporter	1	27	25	0	24	77
G01- Retailer	0	8	36	0	14	58
G02	0	161	242	0	77	480
G03	0	24	82	0	27	133
H01- Restaurant/Café/Canteen	1	167	209	0	116	493
H02	0	2	10	0	1	13
H03	0	35	152	1	31	219
H04	0	101	93	0	77	271
H05	0	23	110	0	17	150
H06	0	23	98	0	16	137
H07	0	21	44	0	40	105
H08	1	50	225	0	148	424
Total	11	697	1333	11	622	2674

3.5.2 Vertical Directive Premises: The Team are responsible for the approval and inspection of premises in accordance with Regulation 853/2004 and 854/2004. These premises are involved in the manufacture of specific high risk foods (such as meat, fish and dairy products), and require an approval number to be issued to allow businesses to trade within the European Community prior to the commencement of trading. As of April 2015 there are 19 establishments approved, 3 were approved during 2014-15.

3.5.3 Food Incidents/Alerts. The authority will respond to all Food Alerts issued by the Food Standards Agency and act in accordance with the Food Alert and Food Standards Agency Code of Practice. For the period 2014/2015 the Consumer Protection Team generated 7 food incidents to the Food Standards Agency.

3.5.4 Overdue Food Hygiene Inspections. For the financial year 2015-2016 there are 208 Category D and 219 Category E food premises that are due for inspection. There are insufficient resources to inspect all premises due for inspection. Due to the low risk nature of these businesses they will not be

inspected unless there is intelligence to suggest there is a problem. The resources are targeted to the highest risk businesses and non-compliant businesses. The team achieved 100% inspection of those premises posing the highest risk for food hygiene (Cat A, B & C) and food standards (Cat A).

3.5.5 Overdue Food Standards Inspections: At 14/4/15 there is a backlog of 231 category B food standards inspections which are due or overdue for inspection. There are insufficient resources to inspect all premises due for inspection. The overdue category food standards inspections are triaged and prioritised according to resource available.

3.5.6 The Authority was subject to an audit by the Food Standards Agency in 2012 to examine our approach to Food Standards enforcement. The auditors were satisfied that although we deviated from the Code of Practice in that there were overdue inspections, we did have a risk based approach to identifying and inspecting overdue premises.

3.5.7 Formal Enforcement work:

Whilst we continue to give advice and support to businesses to assist them achieve 'broad compliance' with food hygiene law, we have increasingly needed to undertake formal enforcement actions. The table below shows the increased enforcement actions undertaken to achieve compliance.

	2012/13	2013/14	2014/15
Formal closures of food businesses	6	0	0
Voluntary closures of food businesses.	9	7	28
Food hygiene improvement notices served	47 across 25 premises	58 across 31 premises	117 across 59 premises
Voluntary undertaking to undertake measures to control E.Coli	Not measured in this year	12	15
Completed Prosecutions with court outcome	2	3	6
Prosecutions still under investigation	Not recorded for this year	6	9
Simple cautions	2	1	4

3.5.8 National Food Hygiene Rating Scheme:

The following table shows the National Food Hygiene Rating Scheme (NFHRS) analysis for the last 3 years by comparison. This shows that there has been an increase in the premises attaining the highest standards of food hygiene (rated 5),

but also that there has been an increase of premises with the poorest standards of food hygiene (rated 0, 1 or 2)

FHRS inspection result	At 22/3/12	At 12/3/13	At 7/3/14	At 14/4/15
5 - Very good	522	595	597	667
4 - Good	465	442	436	445
3 - Generally satisfactory	471	301	238	265
2 - Improvement required	107	148	130	119
1 - Major improvement required	187	242	264	264
0 - Urgent improvement required	24	21	39	41
Total rated establishments	1776	1749	1704	1801

NB: The NFHRS allows for certain categories of business to be exempt from the scheme if they do not sell direct to the public or are handling low risk food only e.g. newsagents

The team have seen an increase in the request for rescores by businesses of their food hygiene rating following their primary inspection from 39 (2013/14) to 60 (2014/15). Only 3 premises reduced in rating, two remained the same and the majority increased in rating. The breakdown of improvement is detailed below:

Start/finish rating	No. of premises
0 to 3 rated	2 premises
0 to 4 rated	4 premises
0 to 5 rated	1 premise
1 to 5 rated	6 premises
1 to 4 rated	7 premises
1 to 3 rated	3 premises
1 to 2 rated	2 premises
2 to 5 rated	17 premises
2 to 4 rated	4 premises
2 to 3 rated	2 premises
2 to 2 rated	1 premise
3 to 5 rated	3 premises
3 to 4 rated	2 premises
4 to 5 rated	2 premises
3 to 2 rated	1 premise
2 to 1 rated	1 premise
2 to 0 rated	1 premise
1 to 1 rated	1 premise

3.5.9 New Legislation

The Food Information Regulations 2013 came into force 15th August 2014. The Regulations require food businesses to provide allergy information on food sold unpackaged, in for example catering outlets, deli counters, bakeries

and sandwich bars. There are also changes to existing legislation on labelling allergenic ingredients in prepacked foods.

During routine food hygiene and/or food standards inspections officers will check how businesses are implementing the requirements of these Regulations.

3.5.10 Ethnicity: We do not record the ethnicity of businesses. However Enfield does have a very diverse population and a particularly large Turkish and Polish community.

3.5.11 Accessibility to the Service: Service Operational Hours: The Consumer Protection Team are located at:

Enfield Council
Civic Centre
Silver Street
Enfield
EN1 3XH

Officers can be contacted by their work email or telephone. Alternatively there is a generic email at environmental.health@enfield.gov.uk or via the Council contact center on 020 8379 1000.

The main office hours are 09:00-17:00. Senior officers may be contacted via the Council Out of Hours provider (020 8379 1000) for emergencies only.

3.5.10 External Grant Funding and Support: External grant funding from the Food Standards Agency (FSA) for food sampling continues to be available. We applied for and were awarded £14K for food sampling in 2014/15.

Funded coaching has been provided by the Food Standards Agency to support businesses in compliance with the requirement for documented food safety management systems. This training has been targeted at 20 of the poorest performing food premises rated 0-2 on the National Food Hygiene Rating Scheme. This training has yet to be completed and evaluated but demonstrates how the team continue to support business.

The Authority were also awarded a grant of £3,738.00 from the FSA to encourage businesses to display their stickers for the National food Hygiene rating Scheme. This was very successful:

- 531 visits to check display were made
- 54% were not displaying rating (291 premises)
- Of these we carried out 275 face to face visits
- Following the face to face visits 201 premises put up their rating (73%)
- Of the 531 originally visited 83% of them now display their rating

3.5.8 Enforcement Policy: The enforcement policy has been revised and is on public consultation until the 10th June to reflect the requirements of the BRDO

Appendix A:

Food Standard Agency Framework Agreement Update for 2015/2016
(Final Draft 8/6/15)

Regulator's Code (July 2013) which was introduced in April 2014. The Regulators Code sets out a clear framework of what action businesses can expect the Authority to take when breaches of the law are identified. The enforcement policy is followed for all enforcement action undertaken by the food service and is available at www.enfield.gov.uk

3.5.9 Liaison with Other Organisations: The team contributes to regional activities through attendance at:

- North East Sector Food Liaison Group
- Environmental Health Forum (HPA)
- Association of London Environmental Health Managers

4.0 Service Delivery

4.1 Intervention at Food and Feed Establishments

Food Establishments

4.1 The authority aims to undertake good quality, effective interventions that reduce risk to public health. This is seen as vital for consumer confidence and for the economic viability of local businesses.

Improving compliance of non-compliant businesses (rated 0-2):

4.2 The team aim to target non-compliant premises which are rated 2 or below on the NFHRS seeking to improve hygiene standards to bring the business into broad compliance. These premises will be subject to additional interventions (advice/education and verification visits). Officers will also serve food hygiene improvement notices and or seek to prosecute where serious and/or persistent food hygiene offences are identified.

Interventions for 2014/15:

I02 - Verification/Surveillance	670
I03 - Advice/Education	54

4.3 These interventions have historically been undertaken after the programmed food hygiene inspection and the officer will not re risk rate unless there has been a specific request under the NFHRS the business. Therefore whilst a business may have moved into broad compliance it would remain with their original risk rating and show as non-compliant.

4.4 For 2015/2016, we have revised our approach to achieving compliance in premises rated NFHRS 0-2.

- Three months prior to the programmed inspection of any 0-2 the officer will undertake an advice/education intervention and may serve formal notices if required. Estimated time 1.5 hrs.
- Two months prior to the programmed inspection the officer will undertake a verification visit.
- Programmed inspection date – when the premises are risk rated. The premise should be able to demonstrate sustained improvement and be broadly compliant.

The remainder of the inspection programme

- 4.2 The aim is to achieve 100% inspection of highest risk premises. This will include Category A –C for food hygiene and Category A for food standards. All premises are inspected and risk rated in accordance with the Food Law Code of Practice.
- 4.3 Appendix C details the operational activities of the team for 2015/16. .
- 4.4 The Food Law Code of Practice requires that unrated (i.e. new) food premises should be inspected and risk rated. There is insufficient resources to undertake all the inspections due, targeting of the 0-2 rated premises and inspection of unrated premises. Therefore, we will assess each unrated premises and identify those that appear to pose a higher risk and arrange for them to be inspected. Those that pose a low or no inspectable risk will not be inspected or risk rated. Officers are expected to inspect one new business each a month. Based on current staffing levels this will only achieve 6 a month, we average about 30 new premises a month.

Inland Control of Imported Food

- 4.5 Officers routinely check the traceability of all food during their interventions and this includes food that has been imported from outside the EU (“Third Countries”).

Feed Establishments

- 4.6 The Council has a statutory duty to maintain a register of animal feed premises in the Borough and to implement a risk-based inspection programme of animal feed establishments to ensure compliance with the relevant EU and UK legislation.

At present, there are 47 registered premises in Enfield which are mainly farms and food businesses supplying waste food into the animal feed chain. Along with other London Boroughs, the number of feed premises within Enfield is relatively small when compared with the number of establishments that the Council has responsibility for in relation to food and health and safety.

In order to ensure that our legal responsibilities are met, Enfield has collaborated with other Boroughs in a pan-London project managed by

ALEHM. This is the second year of the project (which is funded by the Food Standards Agency) and has involved 2 strands – a desktop intelligence gathering exercise to clearly identify potential animal feed establishments across London and a programme of inspections concentrating on higher risk premises such as those that supply waste food into the animal feed chain.

A total of 13 inspections were carried out in Enfield and all of the premises were found to be broadly compliant. The inspection programme is to continue in 2015-16 and this will be accompanied by a risk-based sampling programme. There are also plans to produce standard documentation and procedures in relation to animal feed to further improve feed regulation and enforcement across London. This will be led by ALEHMS.

4.7 Complaints

4.6.1 All complaints are recorded on the M3 database, assessed, prioritised and dealt with according to risk to determine level of intervention and appropriate further action. Therefore not all complaints will be investigated some may just be logged for information.

Number of food complaints received

Year	Food Hygiene	Food Standards
2013/2014	263	134
2014/2015	262	125

4.8 Home/ Primary Authority Principle

4.8.1 Enfield will continue to support those businesses through the Home Authority Principle, providing advice and support on a range of food hygiene/standards and trading standards matters. We will also continue to provide information to local authorities about businesses for which we act as Home Authority following any referral made.

4.8.2 At 14/3/14, Enfield has 41 Home Authority partnerships. We have five Primary Authority Partnerships with;

- JJ Fast Foods
- Gama
- London Bread and Cake
- G R Wrights
- Horizon Foods

The primary authority partnerships were set up when the scheme first evolved and all need to be reviewed. Enfield does not charge for this function at present. The five premises do not place any unreasonable demands on the service.

4.8 Advice to Business

- 4.8.1 The Consumer Protection team are committed to supporting businesses in the borough, facilitating legal compliance, business growth and overall employment and economic viability for the borough.
- 4.8.2 Advice is provided via a variety of mechanisms for example, during official interventions (inspection; revisit; sampling); following a complaint/accident investigations, during training courses and when businesses contact the team.
- 4.8.3 The team will also signpost businesses to other partners, agencies and other Council departments who may be able to assist them.

4.9 Feed and Food Sampling

- 4.5.1 In accordance with the Food Law Code of Practice we have a food sampling policy and programme published on our web site. The sampling programme is co-ordinated through the North East Sector Food Liaison Group, attended by the PA. The programme will also incorporate any additional funding for sampling provided by the Borough.

Sampling will include a range of microbiological and analytical samples of foodstuffs and environmental swabbing.

- 4.5.2 The Consumer Protection team will participate in EU coordinated; national; Public Health England, London-wide coordinated sampling projects where there is a clearly identifiable risk/problem specific to Enfield.
- 4.5.3 Samples are sent for microbiological examination to Public Health England and samples requiring chemical or physical analysis are sent to the Public Analyst.
- 4.5.4 The Food Sampling Policy is at Appendix D. A review of the Food Sampling Programme performance for 2014/15 and the outcomes are contained in Appendix E. Appendix F details the Food Sampling Programme for 2015/2016.

4.6 Control and Investigation of Outbreaks and Food Related Infectious Diseases

- 4.6.1 In accordance with advice from Public Health England the Authority no longer investigates isolated incidents of certain food poisoning organisms, namely Salmonella and Campylobacter.

- 4.6.2 All other isolated cases of food poisoning and all outbreak incidents are investigated in accordance with the Joint Infectious Diseases Protocol and Outbreak Control Plan (issue July 2012).
- 4.6.3 The team aim to respond to 100% of outbreaks within 24 hours of notification.
- 4.6.4 All staff follow internal procedures and the Public Health England plans for investigation of food borne illness:
- [Outbreak Control Plan.](#)
 - [Joint Infectious Disease Protocol](#)
- 4.6.5 There is an out of hours emergency contact telephone list of senior managers should such an incident arise. This is accessible via 020 8379 1000.

4.7 Food Safety Incidents

- 4.7.1 The team will respond to all Food Alerts issued by the Food Standards Agency and act in accordance with the Food Alert, Food Standards Agency Code of Practice and internal quality procedures.

4.8 Liaison with Other Organisations

- 4.8.1 The Council is committed to ensuring that the enforcement approach it adopts is consistent with other Authorities. This is achieved through:
- Team Leader- Consumer Protection attends the North East Sector Food Liaison Group.
 - Senior Environmental Health Officer attends the London Public Health Forum Meetings and London Food Fraud Group.
 - Team Leader and/or Head of Regulatory Services attend the ALEHMS meetings.
 - Staff are encouraged to participate in relevant Knowledge Hub forums.

4.9 Feed and Food Safety and Standards promotional work, and other non-official controls interventions

- 4.9.1 Where resources permit the team will support the wider public health agenda through education and promotional work. Unfortunately in 2014/15 and in 2015/16 there have been no resources available to promote the following: This includes:
- Promoting the CIEH Healthier Catering Commitment
 - 'Eat Better Start Better' nutrition nursery Project

5. Resources

5.1 Financial Allocation

5.1.1 The budget for the Food Safety team:

Year	Budget
2014/15	£368,830.00
2015/16	£363,670.00

5.2 Staffing Allocation

5.2.1 See section 3.2 for the organizational structure. The team is supported by a generic pool of business support (administrative) officers.

5.2.2 Officers are expected to achieve a monthly inspection target of:

- 15 food hygiene inspections from the programme
- 1 food hygiene inspections of new premises
- For premises where the NFHR is 0-2; 2 months before the FHI is due undertake an advice & education intervention; one month before FHI due undertake a verification intervention.
- Any Cat A FS inspection allocated (no target)
- Cat B FS where the FH is also due.
- Service of notices; preparation of prosecution files.
- Other interventions as required
- Other incoming reactive work e.g. complaints; food poisoning notifications

5.2.3 In 2014/2015: 1 FTE went on maternity leave in November 2014 (until May 2016) and 1 FTE moved to corporate health and safety as part of a restructure in February 2015. There has been no backfill for this – except temporary agency work to undertaken inspection work (see below).

5.2.4 In 2015/2016: there is one current vacancy following the successful internal recruitment into the principal environmental health officer's post following the resignation of the previous post holder.

The P01 0.8 FTE officer has given advance notice that they will retire in November 2015.

This is inevitability going to have an impact on service delivery. Delivery of the food service and inspection programme and the available resources and budget will be kept under regular review

5.2.5 A contractor was been employed between April- May 2015 to inspect the NFHRS 3,4,5 premises. This resulted in 177 inspections.

5.2.3 The use of external contractors will only be considered where there is a back log of inspections which cannot be completed. All contractors must meet the requirements of the Food Safety Act Code of Practice Qualifications and Experience of Authorised Officers.

5.2.4 Three external contractors were used in February and March 2015. They were tasked to inspect the back log of new premises. Two of the contractors were also used to reinspect and risk rate those premises that were close to being broadly compliant.

This resulted in 246 inspections of which 174 were re risk rated to give a broad compliance figure of 70%. 72 of the 246 premises remained non compliant (30%)

This decision to re-inspect and re risk rate was taken by the Head of Service following the publication of the WHICH report in February 2015 which cited Enfield as the poorest performing Authority.

The Authority refuted this allegation. Enfield, like many metropolitan authorities, experience a number of factors that contributes towards poor compliance in food businesses. However, we explained that we take a robust approach to food enforcement and apply the NFHRS Brand Standard accurately and consistently. Enfield was also amongst the top 10% of local authorities undertaking formal enforcement actions against non-compliant premises. This measure was not reported on by WHICH.

The Assistant Director, Head of Service and Team Leader met with representatives of the Food Standards Agency; John Barnes, Head, Local Delivery Division and the Head of Audit to discuss our concerns. At the time of the meeting the Agency gave positive feedback that the Authority's performance across all of the LAEMS metrics was not of concern.

Enfield invited the FSA to undertake a full audit which at the time was declined due to no obvious concerns regarding our overall performance. The FSA did recommended that we participated in inter Authority audits.

The Authority also met with representatives of WHICH to discuss their concerns over the report and how this was being interpreted. WHICH advised they are likely to publish a similar report in 2016.

As part of the North East Food Sector programme of audits, Enfield carried out a peer review audit with Islington in May 2015. The

Authority are awaiting the formal report but the initial feedback was extremely positive. The auditors took a sample of inspection reports, notices and prosecutions focusing on food safety management procedures and cross contamination risk due to E. Coli.

Islington commented on the robust action the Authority were taking and considered the inspection rating fair and proportionate in line with the code of practice and the brand standard. They praised the comprehensive inspection reports produced by officers and were impressed with the high level of intervention work the team carried out.

- 5.2.5 The Association of London Environmental Health Managers (ALEHMS) are approaching the Food Standards Agency in relation to the code of practice requirement for a "Trading Standards" qualification for the competent lead officer for Animal Feed and Feeding stuffs. Enfield do not have a food officer with this qualification. This work is currently undertaken on behalf of Enfield and all London Boroughs by ALEHMS,

Total Mobile – Mobile working

The testing for this was scheduled for May 2015 with a go live date of 25th May 2015. However this work is currently on hold due to commercial discussions between total mobile and Serco.

It is anticipated in the long term, efficiencies will be gained via reduced officer time writing up inspections, all data will be captured and generated on site. There will also be an administrative saving as documents will be downloaded direct into the M3 system avoiding the need for scanning paperwork.

5.3 Staff Development Plan

- 5.3.1 In line with the Corporate procedures, staff appraisal and development assessments are completed by June of the financial year. Six monthly review meetings in September/October. Training needs are identified during this process and may also arise during the course of the year.
- 5.3.2 Food officers will be provided with the minimum 10 hours food training as required by the Food Law Code of Practice. The Authority has subscribed to online food safety training provided by ABC Food Safety. A series of training days have been allocated, one day per month, to cover a range of subjects.
- 5.3.3 The Authority has offered to host a FSA training day on the Food Information Regulations in June.
- 5.3.4 Each staff member will have a personal development plan developed for them for 2015/16 as part of the appraisal process.

6. Quality Assessment and Internal Monitoring

- 6.1 The Team Leader and/or Principal Graded Officers will aim to audit 10% of all food hygiene and standards inspections.
- 6.2 The Consumer Protection Team policies and procedures are detailed in the Quality Manual, available electronically. However these do need to be updated.
- 6.3 Inspection risk rating consistency exercises have been carried out at team meetings and are led by the staff.
- 6.4 Complaints against the service are received and recorded by the Correspondence and Complaints Manager, and investigated in accordance with the published Corporate Complaints procedure

7. Areas for Development

- 7.1 We are exploring further why the broad compliance level is so poor across the A –C food hygiene rated premises in Enfield. We pride ourselves on high quality inspections and fair interpretation and application of the law and of the risk rating scheme. There are a number of measures we have taken/are taking to seek to bring 0-2 rated premises into compliance. These include:
 - The team leader will speak to other Authorities identified in the WHICH report as “good or most improved performers” to try and identify possible areas of improvement for Enfield.
 - For 2015-2016 the Authority has 200 premises rated 0-2 on the NFHRS. The proposed approach for this year is to undertake two interventions prior to the programmed inspection when the risk rating is undertaken.
 - Seeking external funding for an additional dedicated resource to improve business compliance and meet inspection demand.
- 7.2 As with many authorities, there are insufficient resources to deliver all demands in the food safety service. This is an ongoing challenge. Therefore, we continue to prioritise the available resources to the highest risk work.
- 7.3 We anticipate that the implementation of Mobile working this will create some efficiencies that can be re-invested into meeting the inspection programme, unrated new premises and overdue inspections.
- 7.6 All procedures need to be updated. The Team Leader has raised this with the NE Sector to see if there are opportunities for sharing procedures.
- 7.7 Continue to improved content on the web and need to be mindful of the wider Council move to Enfield 2017.

8. Service Delivery Planned for 2015/2016

Refer to Appendix B for a programme of the proposed work.