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| 0.0 Introduction | The Council is designated as a Food Authority under the Food Safety Act 1990 and as such has a statutory duty to enforce the Act.  

The Food Service Plan is dedicated solely to the food safety enforcement function. It covers all elements of food safety and hygiene for which Harlow Council has enforcement responsibility.  

This Service Plan has been produced in response to a requirement by the Food Standards Agency (FSA) in its *Framework Agreement on Local Authority Food Law Enforcement*. The FSA was established in April 2000 as an independent monitoring and advisory body in response to widespread public concern over a number of food safety issues. One aim of the FSA is to make food law enforcement more effective, efficient and accountable.  

The Service Plan sets out how Harlow Council will deliver the food safety enforcement function in accordance with current guidelines for the period 2012 to 2013. This document sets out the following:  

- food safety objectives detailing the Council's responsibilities as set out in legislation, associated statutory code of practice and national Guidelines;  
- the current work programme within the Service;  
- the Council's policy on food safety, sampling, provision of information to business, investigation of complaints and allegations of Food Poisoning, response to Food Safety Alerts and infectious disease control.  

The Environmental Health Service is committed to protecting the public by ensuring a safe trading environment in Harlow.  

To achieve this, priorities are established by using a risk assessment approach. Activities relating to a wide range of food safety legislation include: inspections; sampling programmes; response to complaints; education/promotional campaigns and the provision of specialist advice to traders. |
|---|---|
### 1.1 Aim and Objectives

**Aim:**
- To ensure that food and drink intended for sale for human consumption, which is supplied, manufactured, produced, stored, distributed, handled or consumed within Harlow complies with the law, is free from contamination and is without risk to the health of consumers (people who work, live or visit Harlow).
- The Environmental Health Service is committed to ensuring that satisfactory standards of food hygiene are practised and maintained.

**Primary Objectives:**
- To ensure the health and well-being of the public by promoting and enforcing safe standards of hygiene and food safety in the preparation, manufacture, storage, distribution, handling and sale of food in all relevant food premises in Harlow in accordance with the requirements of the Food Safety Act 1990, The European Communities Act 1972 and all regulations, orders, byelaws or other subsidiary legislation made there under.
- To undertake an effective and planned programme of quality risk based food safety inspections of food premises (by qualified and suitably trained officers), to ensure compliance with food law and to minimise risks to health and safety;
- To take appropriate enforcement action proportional to the risks involved and in accordance with the Council’s Food Safety Enforcement Policy with due regard being given to guidance from relevant external bodies;
- To monitor foodstuffs manufactured, imported, stored or on display for sale in Harlow, through a planned yearly sampling programme which includes imported foods. To carry out reactive sampling for microbiological examination;
- To promote effective communication with consumers and businesses on food safety matters within Harlow;
| 1.2 Links to Corporate Objectives and Plans | • To encourage, assist, and support food businesses/residents of Harlow by providing information, education, training and advice;  
• To investigate all relevant complaints regarding premises, practices and food items in accordance with service customer care standards;  
• To investigate and control outbreaks of food poisoning and other food borne disease within Harlow and take appropriate action to prevent any recurrence;  
• To complete and submit timely, accurate statistical returns to the Food Standards Agency requirements;  
• To actively support Essex Food Liaison Group and its sub groups;  
• To carry out the activities in this Service Plan with an educative approach where possible, dependant on available resources.  

The Food Service along with all other Council services is included within the corporate planning process. This includes the 2020 Community Plan, Corporate Plan 2011/12 – 2015/16, the Regulation Service Plan and Individual Personal Performance Plans.  

Service Plans are used to develop the Council’s Personal Performance Plans to assist in identifying key objectives for staff in the forthcoming year.  

All Service Heads as part of this process are required to produce an Annual Service Plan, which is presented to the Corporate Management Team. Performance indicator returns (both national and local) have been in place for a number of years and are annually reviewed.  

Harlow Council’s Statement of Intent, focuses on the Council’s priority aims and objectives, and represents the Council’s top-level policy document outside of the 2020 Vision. This corporate vision forms the philosophy that drives everything Harlow Council does and provides a framework for
Service planning and delivery.

In February 2011 the Council agreed a Corporate Plan that sets out how the Council is going to tackle local people’s priorities and improve services.

The Corporate Plan Priorities 2011/12 – 2015/16 are:

- Regenerating the Town;
- Promoting enterprise;
- Promoting a clean, green, healthy and safe environment;
- Improving housing choice and tackling housing need;
- Developing good citizenship through promoting aspiration and enabling responsibility;
- Providing value for money.

The Food Service contributes directly to the Corporate aims in the following ways:

- Food is a prerequisite of health. The safety, quality, and wholesomeness of food plays a key role together with nutritional issues, in improving health;
- The Service focuses on protecting the public and promotes good quality food production in Harlow;
- By helping to create economic prosperity and sustainability ensuring a prosperous economic future for local business that can compete on a level playing field;
- By working in partnership with other agencies and services aimed at improving the quality of life, health, safety and well being of the citizens of Harlow;
- Providing life-long learning through, where resources are available, advice to business and dissemination of information to consumers, enabling everyone to make informed choices about the products they choose to buy;
- Reducing crime through the investigation of complaints and proactive inspection;
- The Service proactively aims to deliver health information and education to the community where resource permits;
- Food Business Operators are consulted and involved concerning inspection of their properties.
• A risk based approach to enforcement results in a lean service which thus ensures value for money in meeting statutory requirements.
<table>
<thead>
<tr>
<th>2. Background</th>
<th>Harlow is almost entirely an urban area surrounded by rural areas controlled by Epping Forest District Council and East Hertfordshire District Council.</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Profile of Harlow</td>
<td>As a new Town, the majority of its buildings and infrastructure are post 1947. There are a few small pockets of older development most notably the area known as Old Harlow. Harlow’s population is currently estimated at 78,300 and is expected to increase to 80,000 by 2012. The East of England Plan could see Harlow approximately doubling in size by 2031. Harlow is a multi-cultural community with one of the highest percentages of ethnic minorities in Essex.</td>
</tr>
<tr>
<td>2.2 Organisational structure</td>
<td>The town is segregated into residential and commercial/industrial areas. The industrial areas employ large numbers of people, a significant number of whom travel from outside Harlow. The London to Cambridge railway line and M11 motorway both pass through the district, providing good communication links with London, M25 and Stansted Airport.</td>
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<tr>
<td></td>
<td>The Food Service forms part of the Environmental Health Service that is managed by the Environmental Health Manager, who in turn reports to the Environment &amp; Licensing Manager. The Environmental Health Service is part of Regulation Services (Planning, Building Control, Structural Engineering, Environmental Health, Licensing, Recycling and Waste Management, Landscape &amp; Biodiversity), reporting to the Regulation Head of Service. The management structure is available on the following link: <a href="http://webserv2/pdf/Visio-Harlow%20Council%20Structure%2002.06.2012.pdf">http://webserv2/pdf/Visio-Harlow%20Council%20Structure%2002.06.2012.pdf</a></td>
</tr>
<tr>
<td></td>
<td>The Food Service is a function of the Environmental Health Commercial Team which consists of: 1 Environmental Health Manager, a small proportion of whose time is undertaking Commercial duties, 1 Principal Environmental Health Officer (PEHO), 3 PT Senior Environmental Health Officers (SEHO’s), 1 PT Technical Officer (TO) and 1 PT Administration / Technical Support Officer (TSO). The Principal Environmental Health Officer provides Technical advice and support in complex cases, undertakes co-ordination, inspections of high risk premises and carries out monitoring on behalf of the Environmental Health Manager. The S/EHOs undertake the planned programmed inspection of food premises within Harlow; investigate a wide variety of complaints; provide advice to consumers/businesses, enforcement activities and food sampling. The TO undertakes food and water</td>
</tr>
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### 2.3 The Scope of the Food Service

<table>
<thead>
<tr>
<th>Subsection</th>
<th>Description</th>
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<tbody>
<tr>
<td>2.3.1</td>
<td>Maintain an up to date register of all food premises in Harlow;</td>
</tr>
<tr>
<td>2.3.2</td>
<td>Inspect all registered food premises on a risk based, rolling programme in accordance with Food Safety Act 1990, The European Communities Act 1972, Statutory Code of Practice (issued June 2008) and take enforcement action as necessary;</td>
</tr>
<tr>
<td>2.3.3</td>
<td>Carry out visits to, and food safety inspections of food premises as necessary within the plan period, including re-visits and investigative visits. (Note–Food Standards and Feedstuffs are the responsibility of the Essex County Council, Trading Standards Service);</td>
</tr>
<tr>
<td>2.3.4</td>
<td>Investigate and resolve to our satisfaction all food complaints and complaints about food premises;</td>
</tr>
<tr>
<td>2.3.5</td>
<td>Provide, where resources permit, advice and assistance to businesses and consumers on food related issues;</td>
</tr>
<tr>
<td>2.3.6</td>
<td>Receive and act on all Food Alerts / withdrawals and recalls issued by the Food Standards Agency;</td>
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</table>

The Health Protection Agency Laboratory at Colindale carries out Microbiological Examination of food and water samples.

Food composition and labelling are the remit of Essex County Council’s Trading Standards Department.

The above two specialist services are represented on the Essex Food Liaison Group.

The Service will:

- Maintain an up to date register of all food premises in Harlow;
- Inspect all registered food premises on a risk based, rolling programme in accordance with Food Safety Act 1990, The European Communities Act 1972, Statutory Code of Practice (issued June 2008) and take enforcement action as necessary;
- Carry out visits to, and food safety inspections of food premises as necessary within the plan period, including re-visits and investigative visits. (Note–Food Standards and Feedstuffs are the responsibility of the Essex County Council, Trading Standards Service);
- Investigate and resolve to our satisfaction all food complaints and complaints about food premises;
- Provide, where resources permit, advice and assistance to businesses and consumers on food related issues;
- Receive and act on all Food Alerts / withdrawals and recalls issued by the Food Standards Agency;
<p>| | |</p>
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<tbody>
<tr>
<td>2.3.7</td>
<td>Investigate all food within the district that might be contaminated and take necessary action. Seize, detain and arrange disposal, as necessary, unfit food;</td>
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<tr>
<td>2.3.8</td>
<td>Monitor the movement of unfit food into and out of Harlow;</td>
</tr>
<tr>
<td>2.3.9</td>
<td>Take action to close food premises found to present an imminent risk to health;</td>
</tr>
<tr>
<td>2.3.10</td>
<td>Identify and inspect premises processing, handling and storing meat products and preparations, and prepare them for Licence approval under the regulations;</td>
</tr>
<tr>
<td>2.3.11</td>
<td>Identify and inspect premises processing, handling and storing dairy, fish and / or egg products and prepare them for Licence approval under the relevant regulations;</td>
</tr>
<tr>
<td>2.3.12</td>
<td>Undertake a food sampling programme that takes account of current food issues. Participate in national and regional coordinated sampling programmes including imported foods;</td>
</tr>
<tr>
<td>2.3.13</td>
<td>Comment, where resources permit, on proposed food legislation, codes of practice and other official documents as necessary;</td>
</tr>
<tr>
<td>2.3.14</td>
<td>Provide appropriate export certification as requested by food companies in the District;</td>
</tr>
<tr>
<td>2.3.15</td>
<td>Investigate all statutory infectious disease notifications and allegations of food poisoning to establish any links with local food businesses or foodstuffs;</td>
</tr>
<tr>
<td>2.3.16</td>
<td>Maintain an up to date and effective outbreak control plan;</td>
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<tr>
<td>2.3.17</td>
<td>Provide advice, where resources permit, to the general public and local businesses on all aspects of food safety law and good practice, as required;</td>
</tr>
<tr>
<td>2.3.18</td>
<td>The Food Service is also responsible in the majority of food premises for the enforcement of health and safety law. This is subject to a separate inspection planning process, with the frequency of inspection also being determined by a nationally recognised intervention programme.</td>
</tr>
</tbody>
</table>
As at 1 April 2012 the Environmental Health Service’s database identifies that it is responsible for enforcing Food Safety in 673 food premises within Harlow. According to the Code of Practice risk categories, these premises are broken down as follows:

<table>
<thead>
<tr>
<th>Risk Category</th>
<th>Number of premises</th>
<th>Inspection Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>2</td>
<td>6 Months</td>
</tr>
<tr>
<td>B</td>
<td>33</td>
<td>12 Months</td>
</tr>
<tr>
<td>C</td>
<td>231</td>
<td>18 Months</td>
</tr>
<tr>
<td>D</td>
<td>110</td>
<td>2 Years</td>
</tr>
<tr>
<td>E</td>
<td>266</td>
<td>AES / 5 Years</td>
</tr>
</tbody>
</table>

New Premises not yet rated: 31

As at 1 April 2012, food premises categories were:

Number identified as Catering premises are : 522
Number identified as Retail premises are : 130
Number identified as Warehousing/Distribution are : 16
Number identified as Manufacturing / packers premises are : 5
TOTAL : 673

As at 1 April 2012 the number of approved, licensed premises are: 4

Meat Products Premises - 2
Minced Meat & Meat Preparations Premises - 1
Egg Packing Premises - 1

There are a number of mobile food businesses operating in the town, which comprise mainly ice cream and burger vans. In addition there are a number of food traders operating on Harlow Market that is open on Tuesday, Thursday, Friday and Saturday each week and a Car Boot Sale which usually occur on Sundays during the summer period. There is also a Continental food market that
visits Harlow approximately twice per year.

The Environmental Health Service is based on the 3rd Floor, Civic Centre, The Water Gardens, Harlow, Essex. The service can be accessed via:

- The internet
- Telephone (9am to 4.45pm Monday to Friday)
- Direct call/inspection/in person at the office or on site
- E-Mail/letters/correspondence.

The Service has an out of hours answer phone that directs callers to the Council's 24hour Central Control number in the event of emergencies. Control has arrangements for contacting Environmental Health staff 24 hours a day, 52 weeks of the year.

Details of the services provided and how to contact us are also provided on the Council's web site.

There are two languages other than English identified as being significant among food handlers and food business operators within the district. These are Bengali and Cantonese. The majority of food business operators are however, able to communicate in English or have somebody present at the premises that can translate. In any cases where there may be language difficulties the Service has the use of “Applied Language”, a telephone translation service to which the Council subscribes. Correspondence is sent where necessary in languages other than English.

A number of advice notes and leaflets on food safety are also available in different languages from The Food Service / FSA.

The Environmental Health Service has adopted the Central and Local Government Enforcement Concordat and is compliant with the Regulators Compliance Code.

Harlow Council adopted a Food Safety Enforcement Policy in 2002, which has been agreed by Members based on the approved framework to ensure consistency across the UK. This policy is built on the principles of the European Concordat on enforcement, and gives priority to those principles.
The Service operates according to its documented Enforcement Policy which is available at the Environmental Health Service Offices and on The Environmental Health Services website. Any departure from the policy will be documented.

All food law enforcement is carried out in accordance with relevant Food Safety Codes of Practice and other Official Guidance produced by the FSA, LBRO and LGR (LACORS).

Food business operators and the public are given the opportunity of consulting our policies at any reasonable time.
### 3.0 Service Delivery

#### 3.1 Inspection Programme

The Food Service inspects, where resources permit, food premises for compliance with Food regulations according to risk as set out in the FSA approved Code of Practice. There are specified procedures and forms to be used by staff when enforcing legislation. In particular, the Code of Practice specifies a risk assessment scheme to be used to assess the risk associated with each food business and its priority for inspection.

The use of the risk assessment scheme ensures that the highest priority is given to food manufacturers, caterers where conditions are below standard and premises that cater for vulnerable groups (children’s nurseries, hospitals and residential/nursing homes).

#### 3.1.1 Inspections achieved

The number of programmed inspections achieved for the period 1 April 2011 to the 31 March 2012 = **230**.

The number of unprogrammed inspections (i.e. new premises / new operators) achieved for the period 1 April 2011 to the 31 March 2012 = **64**.

The number of Food Hygiene Inspections (risk categories A to D) carried over from the last financial Year (2011/2012) is = **32**.

#### 3.1.2 Broadly compliant

On the 1 April 2008, the Government introduced a new National Indicator: Food establishments which are broadly compliant with food law. Three of the six factors assessed within the risk assessment process during a food inspection are used to measure “broadly compliant”. If an establishment scores 10 points or less in each of the level of compliance with hygiene requirements, structure and confidence in management, it is “broadly compliant”. As at 1 April 2012, the percentage of premises “broadly compliant” is **87.52%**.

#### 3.1.3 Inspections programmed

The number of programmed food hygiene inspections for the period 1 April 2012 to 31 March 2013 is = **335**.

Including the carry over from 2011/2012 the total due for 2012/2013 is **367**.
### 3.1.4 Inspection Target

In addition to the 367 inspections there will also be unprogrammed inspections (i.e new premises / new operators). The exact number is difficult to predict but based on last years figure is expected to be around 64 premises. Therefore, total number of inspections to be achieved for 2012/2013 is 431.

### 3.1.5 Enforcement

The target for this year is to achieve the completion of 100% of programmed inspections due (risk ratings A to D) and 100% of all unprogrammed inspections, in accordance with FSA requirements.

The Food Service endeavours wherever possible to use informal means to achieve compliance with the law. Where there is imminent risk, flagrant breaches of the law, or persistent failure to maintain standards, The Service does not hesitate to use its full statutory powers in accordance with its Enforcement Policy, and the principles of the Enforcement Concordat.

During the year 2011/2012 the following actions were carried out:

<table>
<thead>
<tr>
<th>Advisory letters</th>
<th>114</th>
</tr>
</thead>
<tbody>
<tr>
<td>Warning Letters</td>
<td>190</td>
</tr>
<tr>
<td>Improvement Notices</td>
<td>10</td>
</tr>
<tr>
<td>Simple Cautions</td>
<td>0</td>
</tr>
<tr>
<td>Prosecutions instigated</td>
<td>1 #1</td>
</tr>
<tr>
<td>Prosecutions concluded</td>
<td>1 #2</td>
</tr>
<tr>
<td>Food Seizures</td>
<td>0</td>
</tr>
<tr>
<td>Formal Closures</td>
<td>0</td>
</tr>
<tr>
<td>Voluntary Closures</td>
<td>0</td>
</tr>
</tbody>
</table>

Officers in the food team have been allocated responsibility for specific functions and responsibilities. Inspections of food premises requiring specialist input or knowledge are specifically allocated to these officers.

#1 Prosecution instigated at a Fast Food Takeaway for 5 breaches of food hygiene regulations. Court hearing scheduled.

#2 Prosecution concluded on the 20 September 2011 against Piggy's Pantry Cafe for a Cockroach infestation which presented an imminent risk to health. The operator of the premises was found guilty of two food hygiene offences.
### 3.2 Complaints

The Food Service investigates complaints regarding premises, practices and food items, in accordance with the relevant LGR (LACORS) / LBRO / FSA / Code of Practice / Guidance and the internal approved food complaints procedure.

Investigations into food complaints can give an indication of where the food supply chain has broken down. Such breakdowns may be one-offs or can indicate a problem, which, if left unattended, could have serious consequences. Food complaints are normally responded to within 5 working days or on the day of receipt in cases of potential risks to health.

For the period 2011/2012 the food service received 65 complaints/cases.

It is estimated that approximately 65 complaints/referrals will be investigated during 2012/2013.

### 3.3 Home Authority / Primary Authority Principle

The Home Authority principle is supported by the Environmental Health Service, which undertakes its role in this respect in accordance with the guidance issued by the FSA, LBRO and LGR (LACORS) in particular. The Food Service will:

- Provide, where resources permit, advice to businesses on legal compliance where they act as primary, home and/or originating authority;
- Have regard to any information or advice it has received from any liaison with primary, home and/or originating authorities;
- Having initiated liaison with any primary, home and/or originating authority, notify that authority of the outcome.

There are currently no formal Home Authority Agreement set up for the 3 manufacturers in the area.

Primary Authority gives companies the right to form a statutory partnership with a single local authority, which then provides robust and reliable advice for other councils to take into account when carrying out inspections or dealing with non-compliance. It is the gateway to simpler, more successful local regulation.
<table>
<thead>
<tr>
<th>3.4 Advice to Business</th>
<th>There are currently no Primary Authority agreements. Whilst the Environmental Health Service utilises its powers to enforce the food legislation, it recognises that, where food businesses break the law, it may be due to ignorance rather than intent. As a consequence, it is The Food Service’s policy to provide, where resources permit, advice to businesses in a number of different ways, including:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Advice is provided to existing or proposed food businesses, members of the public and other Council services on a reactive and proactive basis;</td>
</tr>
<tr>
<td></td>
<td>• Advice is provided routinely during visits / inspections, but may also result from phone enquiries or letters received;</td>
</tr>
<tr>
<td></td>
<td>• Inspection reports contain a concluding section of advisory matters, which although not relating to specific legal requirements, contain advice on good management practice. Statutory requirements listed in the main body of the report are wherever possible supported with advice on how compliance can best be achieved;</td>
</tr>
<tr>
<td></td>
<td>• The Food Service as part of the Environmental Health Service uses the Council’s website as a resource for the provision of information to businesses and the general public. Further information can be obtained from the Food Standards Agency website and from the newly established “Everything Regulation, Whenever It’s Needed” (ERWIN) site.</td>
</tr>
<tr>
<td></td>
<td>• The provision of a wide range of free advisory leaflets in different languages and information where appropriate;</td>
</tr>
<tr>
<td></td>
<td>• Officers aim to give advice in accordance with recognised guidance and codes of practice.</td>
</tr>
<tr>
<td>3.5 Food Sampling</td>
<td>The Environmental Health Service regards food sampling as an important area of work. As a proactive point – of – sale food sampling programme can provide useful information about the microbiological fitness of food for sale within Harlow. Routine sampling in Harlow in 2010 identified Listeria in a cooked meat product which resulted in a National food alert. Sampling in 2011, linked to</td>
</tr>
</tbody>
</table>
a Typhoid case, identified Salmonella in Coriander spice being sold from a retail shop in Harlow.

A detailed food sampling programme has been devised for 2012/2013 but is also based on the Eastern Region / FSA / Essex Food Liaison group requirements. Local priorities have been included in this programme.

Food sampling will be conducted where appropriate;

- As a feature of food hygiene inspections. Priority is given to sampling at food manufacturers/high risk premises based in Harlow;
- During the approval process of establishments and intermediaries;
- In response to complaints;
- For identified internal, regional and national projects.

Due to current staffing arrangements, most sampling will be conducted on an informal basis to enable the Technical Officer to take a more active role in sampling. This frees up Environmental Heath Officers to concentrate on following up on poor sampling results and to concentrate on inspection targets.

The Service has been allocated a sampling budget by the HPA for the 2012/2013 period.

The number of samples taken for the year 2011/12 was 137. This includes food samples, water samples, swabs and cleaning cloths. Of the 137 sampled a total of 34 were classified by the HPA laboratory to be of a borderline or unsatisfactory microbiological standard. Follow up work and further sampling is undertaken where results are not of a satisfactory standard.

It is estimated that the number of scheduled samples to be collected during 2012/2013 period should be a minimum of 140. Arrangements are in place with the HPA at Colindale to carry out the microbiological examination of samples.
### 3.6 Infectious Disease

The measures to be taken to control the spread of infectious diseases are contained in various Acts of Parliament and their associated regulations. This legislation includes the control of food poisoning and food and water-borne diseases.

During 2010/11 the Service received 94 formal notifications of infectious disease, mostly food-borne. Notifications include Salmonella, Campylobacter, Cryptosporidium, Giardia, E coli O157 and Legionella. The source of these infections is often unknown for a variety of reasons. Some are attributed to travel abroad and many may have been acquired in their own home.

A further 18 allegations of food poisoning for the year 2011/2012 were received by this Service. It is widely acknowledged that the majority of cases go unreported. However, a single case may lead to the discovery of an outbreak if the person concerned is a food handler.

The investigation of food poisoning cases is therefore given a high priority.

The Food Service has a documented infectious disease outbreak plan, which includes a detailed written procedure supported by reference material, plus two field cases, which contain supplies of documents and sampling equipment necessary to investigate an outbreak.

The resource requirement for this function for 2012/2013 is impossible to quantify. Outbreaks of this nature are infrequent, individual events. Should the need arise, staff from all disciplines within the Environmental Health Service would be expected to assist with an investigation. Lower priority work would be cancelled or postponed. The overall Service Plan acknowledges the need for the team to be flexible to accommodate the scale of any outbreak encountered.

### 3.7 Food Safety Alerts / recalls / withdrawals

This function is carried out in accordance with Food Safety Act 1990, Code of Practice and internal procedures to:

- Identify and report food hazards/incidents;
- Respond to Food Safety Incidents/Food Safety Alerts issued by the FSA.

The Code of Practice requires that The Food Service is connected to the Environmental Health Computer Network (EHCNet) as the FSA communicates Food Safety Alerts via this network.
### 3.8 Liaison

Food Safety Alerts ‘for action’ received are always printed off, actioned immediately by the PEHO and circulated to all food officers, and subsequently filed. Any action taken is recorded. During the year 2011/2012 a total of **39** alerts / recalls / product withdrawals were received.

When appropriate a Food Alert for action is given absolute priority. In some cases this will require visiting multiple premises where the relevant food is likely to be stored.

Food Authorities must now advise the Food Standards Agency of emergency telephone numbers on which responsible officers may be contacted outside the Authority’s normal working hours. This is now linked to the Environmental Health Service out of hours scheme.

The Environmental Health Service supports the work of the Chartered Institute of Environmental Health (CIEH). The Food Service undertakes its food safety functions in accordance with FSA / LGR (LACORS) advice, guidance and statutory codes of practice in order to promote co-ordination, consistency, and good regulation amongst all local authorities.

A number of arrangements have been made to improve consistency of enforcement with neighbouring authorities, health services and other agencies:

- The Service attends and actively supports the Essex Food Liaison Group, the functions of which include: liaison with the Health Protection Agency (HPA) including preparation of the annual coordinated sampling plan; coordination of enforcement approach between authorities; peer review exercises and benchmarking exercises; and liaison with Essex County Council Trading Standards.

- Investigation of suspected food poisoning outbreaks is carried out jointly or in close contact with the Health Protection Agency (HPA). An EHO also attends the quarterly meetings of the Health Protection Agency Liaison Group, which meets at Witham.

The Service also advises and liaises on the following:

- HPA, Community Dietician, Essex Trading Standards, OFSTED;
3.9 Food Safety Promotion

- The Service will continue to maintain the arrangements for liaison with other services within the Council, including: Building Control, Licensing, Waste, Planning and Estates;

- The service is routinely consulted on planning applications involving food businesses. In addition lists of all planning applications received by the authority are routinely forwarded to the Environmental Health Service. Comments and suggested conditions or informatics are returned wherever appropriate.

The Environmental Health Service’s education and promotion activities can have a direct impact on food safety standards. It is therefore committed to providing advice and information both to business and the public where resource permits, including:

- **Food safety information leaflets** – these will be located at public information points, including Harlow Contact Centre, local supermarkets, libraries and doctors’ surgeries, and used to promote food safety to the public;

- **Advice Notes on food safety** – These can be obtained though the Council’s website and through the ERWIN website;

- **Food Safety week** – This is held in June every year. Due to budget cuts following CSR the Service will no longer be participating in Food Safety Week;

- **Healthy Eating Award**; - The ‘Essex Healthy Life’ Healthy Eating Awards are issued by the fourteen Essex Council’s Environmental Health Departments, which together make up the Essex Food Liaison Group. The Gold and Silver awards are for commercial food outlets that offer healthy food, or at least healthy options and are broadly compliant with food hygiene law. Harlow has issued 26 gold awards and 7 silver awards. From the 1 April 2011, due to budget cuts, following CSR, this Service will no longer be promoting the Healthy Eating Award. The team will monitor the changes that the new Public Health agenda brings, which comes into effect from the 1 April 2013, to identify if healthy eating is a priority in the local strategy.
3.10 National Food Hygiene Rating Scheme

- **Ongoing Education** – This will take place during the planned food hygiene inspections for the period 2012/2013 and coaching visits, where resources permit, to implement Safer Food Better Business.

Harlow Council launched the Scores on the doors scheme during October 2008. Since the launch of ‘Scores on the Doors’ we have seen an increase in the number of businesses who are engaging with the Council for advice on how to improve food hygiene and in turn improve their rating.

Due to the CSR, there was no further funding for this scheme. However, the Food Standards Agency launched their ‘National Food Hygiene Rating Scheme’ (NFHRS). No charge is payable by Local Authorities for inclusion in this scheme. In June 2011 grant funding of nearly £9,000 was applied for and successfully granted to pay for the costs of migrating from Scores on the Doors to the NFHRS. The NFHRS was launched in Harlow on the 30 September 2011.

Under the NFHRS food businesses are given a rating for their hygiene, ranging from 0 (urgent improvement necessary) to 5 (very good). The table below provides a breakdown of rated premises. Correct on the 1 September 2012;

<table>
<thead>
<tr>
<th>Rating</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 (very good)</td>
<td>58.6</td>
</tr>
<tr>
<td>4 (good)</td>
<td>23.4</td>
</tr>
<tr>
<td>3 (generally satisfactory)</td>
<td>8.7</td>
</tr>
<tr>
<td>2 (improvement necessary)</td>
<td>3.0</td>
</tr>
<tr>
<td>1 (major improvement necessary)</td>
<td>5.9</td>
</tr>
<tr>
<td>0 (urgent improvement necessary)</td>
<td>0.4</td>
</tr>
</tbody>
</table>

The scheme is a cost effective, well publicised and visible way of promoting food hygiene and empowering consumer choice by making available information to which the Public has a right to access under Freedom of Information Legislation. As well as promoting food hygiene it also gives Harlow Council a best value method for meeting public access obligations.
| 3.11 Food Hygiene Training | The ratings are available as a link from the Councils website and direct on [http://ratings.food.gov.uk/advanced-search](http://ratings.food.gov.uk/advanced-search) and every business is issued with a certificate and window sticker displaying their individual rating.

The Service supports and promotes the food hygiene courses offered by accredited trainers including Harlow College. |
|---------------------------|---------------------------------------------------------------------------------------------------|

| 4.0 Resources | Food safety resources are currently allocated within the overall Environmental Health budget covering food safety, occupational health & safety, pollution (noise, air, water, and contaminated land), Authorisation of premises under the Environmental Protection Act 1990, private sector housing and grants.

A number of inspections were undertaken outside normal working hours, which Officers were paid overtime. Out of hours inspections are likely to be maintained for the period 2012/2013 due to the Code of Practice which requires local authorities to inspect premises during normal opening hours, which in turn will require evening and weekend inspections.

Each member of staff has a dedicated computer terminal for data entry.

No budget is separately allocated for prosecutions or legal action taken as a result of action under this service. Costs are requested from the court in any prosecutions taken, by the Council’s Legal Service, who act on our behalf. |
|-----------------|-------------------------------------------------------------------------------------------------|

| 4.1 Staffing Allocation | For the plan period 2012/2013 the available staff for this Service Plan includes:

- 1 FTE Principal Environmental Health Officer
- 1.8 FTE Senior/Environmental Health Officer (S/EHO) - Fully competent for all food safety activities;
- Approx 200 food inspections outsourced to competent contractors;
- 0.6 FTE Technical Officer (TO) – Not formally competent in food safety matters;
- 0.5 FTE Technical Support Officer (TSO) - Not formally competent in food safety matters. |
|------------------------|-----------------------------------------------------------------------------------------------|
This staffing allocation is not solely for this Service Plan. These officers also carry out duties enforcing health and safety at work, animal welfare and other licensing provisions, and the investigation of statutory nuisances under the Environmental Protection Act 1990.

It has been estimated that the total officer time spent on the Food Service is **2.30** full time equivalent persons (FTE) on professional staff and **0.7** on administration support.

<table>
<thead>
<tr>
<th>Officer</th>
<th>FTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Health Manager</td>
<td>0.10</td>
</tr>
<tr>
<td>Principal EHO</td>
<td>0.40</td>
</tr>
<tr>
<td>S/EHO</td>
<td>1.10</td>
</tr>
<tr>
<td>TO (not formally competent in medium and high risk premises)</td>
<td>0.40</td>
</tr>
<tr>
<td>Administration (Not formally competent in food safety matters)</td>
<td>0.70</td>
</tr>
<tr>
<td>Contract Staff</td>
<td>0.30</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>3.00</strong></td>
</tr>
</tbody>
</table>

The PEHO and all Senior EHO’s are appropriately qualified in accordance with the Code of Practice. The PEHO, S/EHO’s, Contractor EHO’s, are fully competent to inspect all risk categories of premises as required by the Code of Practice and take formal Food samples. The PEHO, S/EHO’s, EHO’s, are authorised to serve Improvement Notices, detain and seize Food and the PEHO and S/EHO’s are authorised to serve Emergency Prohibition Notices. The TO/TSO are authorised to take informal food samples and enter food premises.

The Food Service continues to identify training and development needs with regular review meetings with individual staff. In addition, Officers are assigned special responsibilities to develop a specialism within the Food Service.

Six Weekly team meetings are held to discuss matters and issues of consistency arising under this Service Plan area.
The Service promotes an incentive system for newly or recently qualified EHO’s, to achieve Corporate Membership of The Chartered Institute of Environmental Health (CIEH), by taking the Assessment of Professional Competence (APC), by making an extended salary scale point range available to officers with this qualification.

All EHO’s that are corporate members of the Chartered Institute of Environmental Health (CIEH) are required to undergo at least 20 hours of Continuous Professional Development (CPD) per year. In addition, The Code of Practice requires food inspectors to have undergone a minimum of 10 hours training per annum in accordance with CPD principles. Whilst officers are responsible for monitoring the amount of training they have done in a year, the Service recognises this need and supports staff in achieving the minimum amount required by the CPD scheme. Officers with Chartered Status must complete 30 hours of CPD.

Training needs are identified by examining:

- Operational requirement arising from the Regulation Service Plan;
- Individual needs highlighted at Personal Performance Plan review meetings;
- The introduction of new legislation/Code of Practice and FSA.

How these needs are met may vary, but the typical sources of training include:

- Day release courses;
- On the job training;
- In house short courses;
- External short courses and seminars.

Training must be approved before it is undertaken and it is evaluated after the event. All training
received will be documented as part of The Service’s assessment competency.

Personal Performance Plans (PPPs) are completed on a yearly basis with a six month review.

It is not possible to determine training costs until the PPP process has been completed.

<table>
<thead>
<tr>
<th>5.0 Quality Assessment</th>
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<tbody>
<tr>
<td>From July 2004 The Food Service is delivered within a documented quality system with strategies in place covering most areas of food safety. Within these strategies a documented system is in place for management monitoring of the quality, uniformity and consistency of enforcement.</td>
</tr>
</tbody>
</table>

Within the framework of these documents the following activities are planned:

- **Internal Audits of:**
  - Food Safety Inspections
    - Post Inspection review of case records and documentation
      (100% of contractors’ inspections are currently checked)
    - Accompanied inspections
  - Food Complaints
    - food safety
    - foreign bodies
    - allegations of food poisoning
  - Improvement Notices
  - Emergency Prohibition Notices

The Service also operates a system of peer review whereby officers carry out joint inspections to ensure a consistent interpretation of legislation, codes of practice and national guidance.

There is also a Local indicator, which monitors the response times for complaints received (food & hygiene complaints etc.). The target response times are 1, 3, and 5 working days.
### 6.0 Review

#### 6.1 Review against the Plan

An area for improvement for 2011/12 was to apply for funding to launch the ‘National Food Hygiene Rating Scheme’. As stated in section 3.10 of this plan this authority did receive the grant funding and the scheme was formally launched on the 30 September 2011.

The process of reviewing and updating the Standard Operating Procedures is underway.

#### 6.1.1 Performance Targets

The Service Plan will be monitored to establish:

- Inspections of premises against target;
- Number of food samples taken against target;

In addition, the PEHO will evaluate:

- Actual resource allocation versus projected allocation;
- Responses to food complaints
- Reactive work, formal actions and investigations.

A key aim of The Service is to continually improve the quality, efficiency and effectiveness of its Services.

Where the review process identifies areas for improvement or development, these will be adopted in accordance with current in house documented procedure, the FSA Framework Agreement, Statutory Code of Practice and National guidance.

For the period 2011/12, 89.12% of all programmed and unprogrammed inspections were completed. The target is to achieve 100%, as prescribed by the Food Standards Agency. For the period 2010/11 the Service achieved 85.41%, therefore, an improvement has been made in achieving this target. For the period 2011/12 100% of the highest risk premises inspections were achieved.
### 6.2 Areas for Improvement

Failure to achieve 100% is largely a staff resource issue but is also due to other factors such as seasonal businesses not being open for inspection or those that have registered as a food business but are still not trading by the 31 March 2012.

The percentage of premises that are broadly compliant has improved from 85.02% in 2010/11 to 87.52% in 2011/12.

The percentage of samples taken against the target number set by the HPA for 2011/12 is 97.86%, compared with a similar 98.57% for the period 2010/11. The high percentage figure represents the value this food authority places on the valuable intelligence that sampling provides.

The following Service developments are planned for the period 2012/2013:

- Continue the review and updating of the Standard Operating Procedures and Policies for this Service.

- The Food Standards Agency has produced new guidance about controlling the spread of E. coli O157 by cross contamination. This information will be disseminated to Caterers in a variety of ways including during routine inspections, other visits and by mailshot. The mailshot will be sent within the first quarter of 2012/13.

- Deficiencies in the reporting process for receiving notifications of infectious disease from health service laboratories have been identified. The Service intends to identify new systems for the efficient and accurate reporting of notifications. To be completed within the first quarter of 2012/13.

- During 2012/13 the team are partnering with Essex County Council Trading Standards to deliver the Allergen project. This project is targeting the particular issue of nut allergies from Indian Takeaways. Allergic reactions can have fatal consequences. This project will provide an educational approach to the businesses, followed by risk based sampling of meals. Harlow Councils contribution to this project to be completed by December 2012.
<table>
<thead>
<tr>
<th>SERVICE PLAN APPROVAL</th>
</tr>
</thead>
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| Signed: ..........................  
Strategic Director |
| Signed: Councillor ..........................  Date: .......................... |