

# Food Safety Service Plan

2016 - 18





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## Foreword by Councillor Muriel Davis, Health and Wellbeing Portfolio Leader

Cannock Chase Council's Food Safety Service Plan for 2016-2018 describes how our food hygiene service will be delivered and how we will meet the needs of businesses and members of the public. The plan has been drawn up in accordance with the Food Standards Agency Food Law Code of Practice (2015) and Framework Agreement which together set out the Agency's expectations on the planning and delivery of local authority food law enforcement.

Our overriding aim is to ensure that all food made, sold and consumed in Cannock Chase District is safe. We will support compliant businesses and tackle non compliant businesses so they do not gain unfair competitive advantage or put consumers at risk.

Our work will reflect both local and national priorities, including those identified by the Regulatory Delivery Office (RD), Food Standards Agency (FSA), and Public Health England (PHE). We will also focus on the Council's key priorities of better health outcomes and better jobs and skills.

We are an active member of both the Stoke and Staffordshire and Greater Birmingham & Solihull Local Enterprise Partnerships (LEPs) contributing to the better regulation agenda through minimising burdens on business. This means our businesses are more likely to gain a good reputation, to succeed and grow, bringing increased revenue and employment into our District.

We recognise the valuable contribution to both wider public health and community safety that our food work can make. We will ensure that, wherever possible, we link our work with local strategic priorities, considering the Chase Health and Wellbeing Strategy, Locality Profile and Local Strategic Partnership.

This plan will be regularly reviewed and any comments or suggestions are welcome. The plan is available at [www.cannockchasedc.gov.uk](http://www.cannockchasedc.gov.uk) and further information can be obtained by contacting us on **01543 462621**.

**Councillor Muriel Davis**

Health and Wellbeing Portfolio Leader



**826**  
number of  
food premises  
in the district



**1.25%**  
total council  
controllable expenditure  
on food safety service



**100**  
reported cases  
of food poisoning  
or suspected  
food poisoning



**558**  
number of  
service requests  
we receive  
each year




**100%**  
the proportion of  
businesses satisfied  
with our service



**£1.53**  
cost to each person  
in the District for  
food safety



**1.5%**  
of total Council  
workforce on  
food safety



**57**

food alerts  
received from  
the Food Standards Agency



**98.9%**  
responses to  
service requests  
within target  
(our target is 95%)



**10 days**

average number  
of days taken  
to resolve  
complaints



**2.4 fte**

equivalent full time  
people engaged  
in food work



**216**

the number  
of inspections  
planned for 2016-17



**980**

number of  
business advice  
and support  
visits we did in  
2014-15



**Officers**

all assessed as  
competent and  
maintain CPD





# 1 Service Aims and Objectives



## 1.1 Aims and Objectives

The Council is designated as a Food Authority and as such has a statutory duty to enforce Food Safety legislation.

The overriding aim of the food safety service is to help businesses produce safe food, so that all food produced, prepared, sold and consumed in the District is safe. The Food Safety Service contributes towards the Council's key strategic priorities, particularly in the areas of Better Health Outcomes (reducing incidence of food borne illness and promoting healthier lifestyles) and Better Jobs and Skills (supporting growth of the local economy through fair, proportionate and accountable business regulation).



## 1.2 Key priorities

### Key priorities for 2016-18:

- Supporting businesses towards full compliance;
- Improving engagement with the business community;
- Enhancing engagement with residents;
- Focussing initiatives on vulnerable groups;
- Working with partners to improve local public health outcomes;

We have worked with businesses and undertaken a systems thinking review of our service, following which we have identified our purpose when carrying out food safety regulatory activity:

“  
To help our businesses  
provide safe food  
”

We will assist businesses wherever possible to achieve this, but ultimately the responsibility for ensuring food is safe rests with the business concerned.

The work we do also contributes towards the Food Standards Agency Strategic Plan, ensuring food is safe to eat and that consumers can make informed choices about where to eat.







### 1.3 Links to corporate objectives and plans

**The Council Mission is:**  
 Leading our community to deliver better jobs and skills, more and better housing, cleaner and safer environments and better health outcomes.



This mission is delivered through each of the four priority areas above, with delivery plans aligned accordingly. The food service contributes to the 'Better Jobs and Skills' and 'Better Health Outcomes' priority areas.

The service contributes to Better Jobs and Skills through:

- supporting and advising new businesses
- implementing risk-based, proportionate regulation
- ensuring high standards of regulatory compliance;
- tackling non compliant businesses, so these do not gain unfair competitive advantage;

The service contributes to the Better Health Outcomes priority through:

- Ensuring food is safe and without risks to health;
- Investigating infectious diseases and food poisonings;
- Food sampling;
- Smokefree enforcement;
- Project work focussing on wider health issues;

Performance is reported regularly through a corporate reporting mechanism.

## 2 Background





## 2.1 Profile of the Local Authority <sup>1 2</sup>

- Cannock Chase District is one of eight Staffordshire Districts within a two tier local Government structure. The District, resident to 98,500 people, is the second most densely populated in Staffordshire. The main centres of population are: Cannock (44,000); Rugeley (18,000); Hednesford (17,000); Norton Canes (7,000).
- The overall population of Cannock Chase is projected to increase between 2014 and 2024 with a significant growth in people aged 65 and over (25%) and aged 85 and over (59%), which equates to 3,400 additional residents aged 85 and over by 2024.
- According to the Government's Indices of Multiple Deprivation (IMD) 2015, Cannock Chase is ranked as the most deprived District in Staffordshire, with a rank of 133 out of 326 local authorities in England. There are nine lower super output areas (LSOAs) in the District that fall within the most deprived national quintile, making up around 14% of the total population (13,500 people).
- Cannock Chase District has poor health outcomes compared to the national average in several areas. Overall life expectancy at birth in Cannock Chase is 79 years for men and 83 years for women, both similar to the national average. However, men and women in the least deprived areas of Cannock Chase respectively live seven and five years longer than those living in the most deprived areas.



<sup>1</sup> Cannock Chase Locality profile 2016;

<sup>2</sup> Cannock Chase District Needs Analysis 2016-17



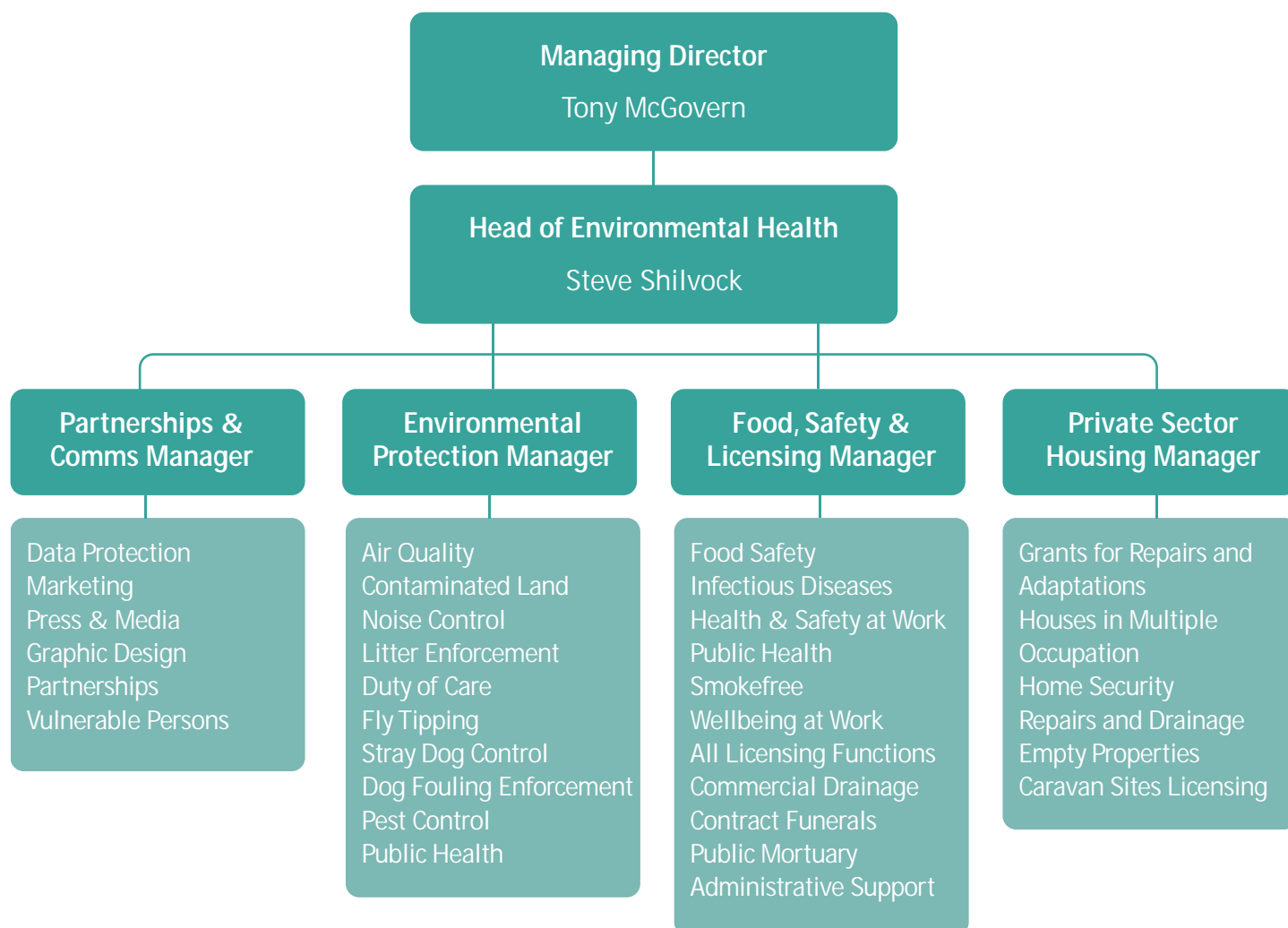
- The number of Cannock Chase residents who die early due to cardiovascular disease is higher than the national average. Around 29% of children aged four to five in Cannock Chase have excess weight (overweight or obese) which is higher than average. Around seven in ten adults have excess weight (either obese or overweight) which is again higher than the national average.
- The proportion of residents describing themselves as from a white UK / British background is 96.5%, above the national average. Cannock Chase District has amongst the smallest black and minority ethnic populations (3.5%) in Staffordshire, comprised of minority white groups (1.3%), mixed ethnic groups (0.8%), Other Asian / Asian British (0.6 %), Indian / British Indian (0.4%), and Black / Black British (0.2%).

## 2.2 Organisational Structure

The **Council** consists of 41 elected Members, representing the residents of the 15 Wards of the District. The full Council has responsibility for adopting and changing the constitution, Council Tax and budget setting, and approving the policy framework for the organisation. The Council appoints the Leader of the Council for a term of four years, and authorises the Leader to appoint the Executive (known as the Cabinet).

The **Cabinet** consists of 9 elected Members, including the Leader. Each Member of the Cabinet (known as Portfolio Leaders) has their own area of responsibility as determined by the Leader. These Portfolio Leaders work closely with Officers to ensure services are provided within the policies of the Council.

The Food Safety Service is delivered by the Food, Safety & Licensing Section, which is part of the Council's Environmental Health Division (see over).



## Lead Officers responsible for Food Safety

David Prosser-Davies, Food, Safety & Licensing Manager, Tel. 01543 464202  
[davidprosser-davies@cannockchasedc.gov.uk](mailto:davidprosser-davies@cannockchasedc.gov.uk)

Lindsey Ellison, Senior Environmental Health Officer, Tel 01543 464349  
[lindseyellison@cannockchasedc.gov.uk](mailto:lindseyellison@cannockchasedc.gov.uk)

## Consultant in Communicable Disease Control

Dr. Musarrat Afza Public Health England, Stonefield House, St. George's Hospital, Corporation Street, Stafford, ST16 3SR  
 Tel. 01785 221126 or 0344 2253560 (Option 2, and 2 again) [musarrat.afza@phe.gov.uk](mailto:musarrat.afza@phe.gov.uk)

## Biological Services

Food, Water and Environmental Microbiological Laboratory  
 PHE  
 61 Colindale Ave, London, NW9 5EQ  
 Email: [fwem@phe.gov.uk](mailto:fwem@phe.gov.uk)  
 Tel: 0208 327 6548/6550/6551  
 Fax: 02083276542

## Public Analyst

Staffordshire Scientific Services, Staffordshire County Council, 14 Martin Street, Stafford, ST16 2LG (Sat Nav ST16 2DH) Tel.  
 01785 277825  
 Fax. 01785 277812  
[staffs-scientific@staffordshire.gov.uk](mailto:staffs-scientific@staffordshire.gov.uk)



## 2.3 Scope of the Food Service

The Food Service is delivered by the Food and Safety Team, which is part of the Food, Safety & Licensing Section within Environmental Health. The Team is operationally managed on a day to day basis by the Senior Environmental Health Officer who, in turn reports to the Food, Safety & Licensing Manager. These Officers together share the Lead Officer role.

The Council is not a Unitary Authority and therefore shares its duties under the Food Safety Act with the Trading Standards Department of Staffordshire County Council. The Council aims to provide a full range of services within its remit offering a balanced approach between education and enforcement.

The Food and Safety Team consists of a total of 6 members who between them equate to 4.75 full time equivalent (fte) officers. It is estimated that approximately 2.40 fte are engaged in delivering the food service, which comprises the elements below:

Maintaining an up to date database of all food businesses in the District;

Undertaking programmed food safety / hygiene interventions;

Food and hygiene complaint investigations;

Responding to food alerts from the Food Standards Agency;

Providing advice and support to food businesses on compliance;

Commenting on planning and licensing applications;

Investigating suspected and confirmed incidents of food poisoning;

Assisting in the investigation and control of infectious disease outbreaks;

Preventing consumption of unfit, unsafe and non compliant food;

Participating in regional and national food sampling programmes;

Undertaking projects with partners aimed at improving wider health outcomes;

The Food Safety Service is delivered alongside a number of Environmental Health functions including: enforcement of workplace, health and safety legislation; general public health activities; licensing, street trading and planning consultations, smokefree compliance, animal welfare, public funerals and refuse / duty of care / drainage / nuisance issues in commercial premises.

## 2.4 Demands on the Food Service

There are **826** food businesses in the District (correct 01.04.16), the vast majority of which are of a retail or catering nature. There are a small number of manufacturers.

Premises by type	Number
Primary Producers	0
Manufacturers and Packers	9
Importers/Exporters	0
Distributors / Transporters	15
Retailers	203
Restaurants and Caterers	599
<b>Total premises</b>	<b>826</b>



Risk Category	Number of Premises	Required Minimum Intervention Frequency
A	0	Every 6 months
B	6	Every 12 months
C	50	Every 18 months
D	357	Every 24 months
E	374	Alternative Enforcement Strategy 36 monthly
OTHER*	39	
TOTAL	826	

\* Businesses not included in the programme, or unrated.

There are 7 premises subject to approval under Regulation 853, of which 3 are approved for meat products and 1 for fish products. Additionally there are 3 approved cold stores.

## Imported Food

The profile of our premises is such that they do not supply a great deal of imported food. Authorised officers will, however, ensure that their food hygiene interventions take account of imported food related issues. Reasonable steps will be taken to assess the legality of imported food from non-EU countries and effective action will be taken on non-compliance in order to protect public health. Officers will seek opportunities during routine interventions, revisits and investigation of complaints etc. to carry out imported food checks including documentary, identity, physical checks and sampling. All officers have received relevant training on imported food law.



## Food Hygiene Ratings

Cannock Chase Council participates in the National Food Hygiene Rating Scheme (FHRS) which allows the public to have insight into food hygiene standards in premises that sell food direct to the final consumer. Each food business in the scheme is given a food hygiene rating after it has been inspected ranging between 0 (urgent improvement necessary) and 5 (very good). The level of compliance with food safety and hygiene legislation is reflected in the rating - a rating of 3 indicates the premises is satisfactory, or 'broadly compliant'. The website can be viewed at [www.ratings.food.gov.uk](http://www.ratings.food.gov.uk). As of March 2016, 99% of food businesses in our District were broadly compliant. The Council also uses the "RateMyPlace" website which allows members of the public and press to view Premises Inspection Reports.



### Profile of National Food Hygiene Ratings for Cannock Chase District:

Rating	Number of Premises
0 (Urgent Improvement Necessary)	0
1 (Major Improvement Necessary)	3
2 (Improvement Necessary)	1
3 (Generally Satisfactory)	22
4 (Good)	63
5 (Very Good)	639
<b>Total</b>	<b>728*</b>

\* numbers exclude premises yet to be rated, approved, or otherwise exempt from the scheme.

## Food Premises Database

We use software to create and manage a database of all food businesses in the District. All of our work is recorded and this is used to assess the overall risk for each premises. The database is continually updated using information from officers together with:

- Food premises registration applications;
- Business rates (NNDR) information;
- Periodic planned surveys of the District;
- Planning and Licensing Act applications;
- Newspapers, websites, social media etc.;





## Service Delivery, Equality & Disability

The operational base of the Food Safety Service is the Council's Civic Centre, which is open between the hours of 09:00 - 17:00 Monday to Friday.

### Service Delivery Point:

#### Address

Cannock Chase Council, Civic Centre, Beecroft Road,  
Cannock, Staffs WS11 1BG

#### Hours

Mon, Tue, Weds, Thurs and Fri (09.00-17.00)

#### Contact details

01543 462621

[environmentalhealth@cannockchasedc.gov.uk](mailto:environmentalhealth@cannockchasedc.gov.uk)

[customerservices@cannockchasedc.gov.uk](mailto:customerservices@cannockchasedc.gov.uk)

If callers are unable to access the Civic Centre, every effort is made to make a home visit where necessary.

At present there is no out of hours service for the receipt of routine requests for service. However, food safety emergencies (such as outbreaks notified via the PHE) and Food Alerts are covered by the emergency standby system (an Officer carries a mobile telephone and will receive text Alerts from the Agency subscription service); Officers also have remote access to internet and e-mails. Programmed inspections and visits are undertaken out of normal office hours as required to observe high risk activities, e.g. evening opening premises / early morning visits to observe practices / weekend events.

## Communicating with businesses

Whilst the District has a significant proportion of restaurants, takeaways and general stores operated by proprietors from Black and Minority Ethnic (BME) communities, language difficulties are not frequently encountered in delivering our services. The Section makes use of internet translation apps, translators and interpreters to assist businesses when necessary, and provides materials such as Safer Food, Better Business packs in different languages where required.

Officers do frequently encounter food business proprietors who have literacy difficulties and will work with such operators to ensure that this does not become a barrier to producing safe food. Officers have developed a range of tools and techniques to assist in this process, including:

- Use of visual aides;
- Translated information cards;
- ATP device to show cleaning effectiveness;
- UV demonstrations of contamination;
- Bespoke action plans;
- Practical cleaning and hand wash demonstrations.

We ask businesses how they wish to communicate with us and will use letters, e-mail, telephone or face to face methods according to the needs of the business, whilst having regard to the Food Law Code of Practice.

## 2.5 Enforcement Policy

A revised and updated Enforcement Policy was adopted by Council in 2014 which takes into consideration the Regulators Code. The Enforcement Policy guides officers towards a staged approach, applying legislation in a proportionate, consistent, and transparent way. Enforcement action will be targeted at those situations that give rise to the greatest risks to safety or health and at non compliant businesses.

The Environmental Health Division aims to support growth of the local economy through fair and accountable business regulation. In our dealings with businesses we will:

- Carry out our activities in a way that supports compliance and growth;
- Provide simple and straightforward ways to communicate with businesses;
- Base our regulatory activities on risk;
- Ensure clear information, guidance and advice is available;
- Ensure that our approach is transparent, fair and proportionate.

### 3 Service Delivery





## 3.1 Food Premises Interventions

The regulation of food premises is undertaken in accordance with the Food Law Code of Practice. All food premises are subject to a detailed assessment based on particular criteria including types of food and method of handling, consumers at risk, level of current compliance in terms of practices, procedures including cleanliness and confidence in management. This numerical calculation is used to rate premises according to risk from A (highest risk) to E (lowest risk).

The Authority follows the inspection ratings in the Food Law Code of Practice (2015) and aims to inspect 100% of highest risk (A and B) premises, 100% of medium risk (C and D) premises and 100% of lowest risk (E) premises due as per Food Standards Agency expectations.



### Inspection Plan for 2016-17

Risk category	A	B	C	D	E	Other	Total
Number of Premises	0	6	50	357	374	39	826
Inspections Scheduled	0	6	21	109	41	39	216

The programme does not include newly opened businesses which represents an additional workload on top of the programme. On average approximately 50 new businesses per annum are identified and inspected.

We will use the range of interventions permitted within the Code of Practice, and in 2016-17 have identified the following programme:

Risk category (Inspections due)	2016-17 Intervention
A (0)	N/A
B (6)	Partial Inspection using Systems Thinking (ST) principles
Broadly compliant C (21)	Partial Inspection or Audit using ST principles
Broadly compliant D scoring 30 or 40 in "type of food / method of handling" (100)	Partial Inspection or Audit using ST principles
Other Broadly compliant D (09)	Other official control from Code para 5.3.2.3
E (41)	Non official control based on visit and information gathering
Unrated (39)	Inspector discretion based on ST principles

Note that, notwithstanding the above, any premises subject to approval under Reg 853 will always receive a full inspection.

The current available resource of 2.40 fte Officers can accommodate this programme of work, together with the reactive workload and project work. Given the team is small, the yearly programmed intervention plan can potentially be severely disrupted by food poisoning investigations, national food alerts, food sampling and non food related matters such as health and safety accident investigations.



“ Tell me and I will forget;  
Show me, I may remember;  
Involve me and I will understand ”

## Systems Thinking Interventions

In recent years we have significantly changed the way in which we work, using a “systems thinking” approach which identifies the purpose of the service from the customer perspective. As we identified our customer as the food business operator, our identified purpose is “helping our businesses provide safe food”. We have examined our processes and have identified the value steps, i.e. those which directly contribute to achieving purpose. We have also removed non-value steps (where this is legally possible).

We differentiate between ‘safe’ and ‘unsafe’ non compliance, focussing on areas of risk and ensuring what we do is geared towards achieving purpose. Our officers are given discretion in how they work with businesses, within broad guidelines. Essentially, Officers work with businesses until the business is deemed safe. A staged approach, using a range of tools and techniques, is used to ensure the business reaches at least broad compliance. This can involve a number of announced / unannounced visits to each business, observing practices and talking with staff. Regular reflection with colleagues is undertaken which reinforces individual and organisational learning and improves consistency of approach.

Interventions are undertaken over a period of time, and may involve a number of visits, allowing us to work with businesses, gaining trust, building relationships and helping them to address any food safety risks.

During 2015-16, for example, Officers carried out a total of 980 advice and support visits to make 480 premises safe (some premises will receive only one visit, others several).

## Revisits

We rarely carry out formal ‘revisits’ as per the Code of Practice definition, since we will be working with the business to address any items of non compliance. Our view is that such items, if having an impact on food safety, should be addressed at the earliest opportunity.

## Alternative Enforcement Strategy (AES)

The Food Law Code of Practice allows authorities to adopt Alternative Enforcement Strategies (AES) for the lowest risk businesses. We will use a combination of methods to inspect such premises, such as telephone surveys, self inspection questionnaires and site visits. Our view is that food business operators (FBOs), particularly of small businesses, value face to face contact with us, so we aim to ensure a proportion of these premises are visited by a suitably qualified officer. This view is supported by research into food safety compliance in small businesses<sup>3</sup>.

During 2015-16 we carried out face to face visits to all of our registered childminders, advice and guidance and collecting information on the nature of the food activities.

An important part of our AES is the receipt of new information about premises, which may require a response (visit, phone call or letter) for example:

- Consumer Complaints
- New food premises registration
- Association with food poisoning outbreak
- Food Alerts for products on sale
- Planning /Building Regulations applications
- Licensee/DPS change

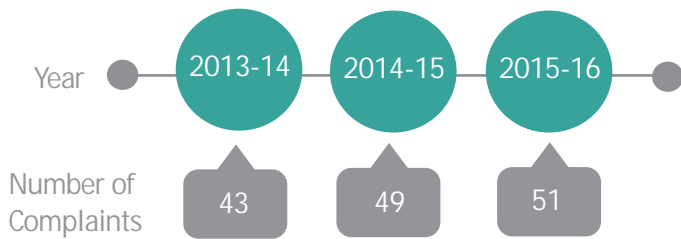
Where new information leads to a visit and subsequent re-rating, this may bring the premises back into the main intervention programme.

<sup>3</sup>Fairman and Yapp (2004) Compliance with food safety legislation in small and micro-businesses: enforcement as an external motivator (Journal of Environmental Health Research, Vol 3, Issue 2, 2004)



## 3.2 Food Complaints

The Food Service receives approximately 50 complaints per annum relating to foodstuffs and / or food premises / food handlers. These complaints are responded to within 5 working days, or sooner (immediately in some cases) if deemed of an urgent nature. When we receive complaints relating to foods produced outside the District we always refer these to the Local Authority in whose area the food was produced (the Originating Authority) or the Primary Authority as the case may be. We investigate all complaints relating to food produced by food businesses within the District.



## 3.3 Primary Authority and Home Authority Principle

The Primary Authority and Home Authority Principles involve one Local Authority, through a formal written agreement, agreeing to act as a single point of contact and provider of advice for larger multi-site food companies who may have operations in many local authority areas (particularly caterers and retailers, manufacturers etc.) In the case of Primary Authorities, this advice is referred to as assured advice and must be taken into account by other enforcing authorities.

Where there are a number of manufacturing units located some distance away from the head office, then the local authorities in whose areas these units are located are referred to as the Originating Authority. The Council will always consult a Home or Originating Authority where enforcement action is possible or where there is evident concern over a company's operations.

The Council is currently the originating authority for a small number of food manufacturers and entered a formal Primary Authority Partnership with Roadchef in 2011 for food safety and health and safety regulation. This presents a limited demand for both proactive and reactive advice.



## 3.4 Advice to Businesses

Assisting businesses to comply with the law is a key priority for us. The Regulators' Code makes clear that businesses should be provided with timely, concise and accessible information and advice.

Approximately 280 requests for advice are received each year. Advice and support to businesses is provided through:

- Contact during inspections and interventions;
- Targeted projects (for example, work on E. coli guidance in 2015)
- Provision of Government, or Council produced leaflets / publications;
- Response to requests for advice and on site visits;
- Pre-planning or pre-development advice for new and existing businesses;
- One to one support for both general compliance and improvement plans;
- Information on our website;



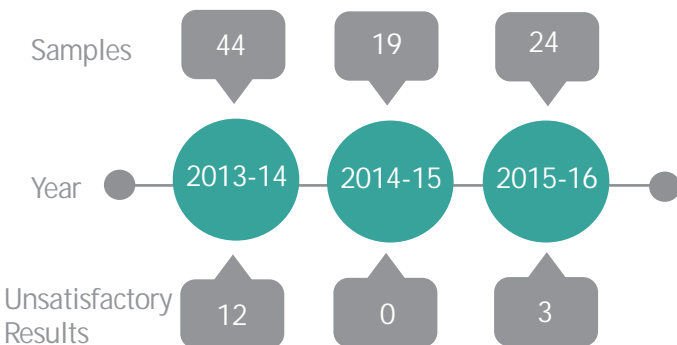
## 3.5 Food Sampling

Microbiological food sampling is carried out to:

- confirm food safety standards in the District;
- investigate food complaints and suspected cases of food poisoning;
- participate in national co-ordinated sampling programmes;
- provide information on food safety standards in the District;
- identify issues of concern which can be addressed on food inspections;

Numbers of food samples taken have fallen over recent years, reflecting a national trend. Over the last 3 years, sampling has included:

- Restaurant / Take Away food
- Cloths & chopping boards in contact with food
- Iced drinks
- Fruit
- Ice cream
- Fish products
- Salads



On receipt of an unsatisfactory result, an authorised officer will consider what action, if any, is appropriate. Premises will always be advised of the results and may be written to or re-visited depending on the circumstances and the nature of the result. Re-sampling may also be undertaken if considered necessary.

The Council operates its Sampling Programme in full co-operation with the Central Food Group North (Staffordshire & Shropshire Food Liaison Group) ("The Food Group") which itself includes representation from Public Health England. The Council contributes to, and participates in, any sampling programmes identified by the Group as well as any locally identified sampling priorities.

Samples for microbiological examination are sent to the UKAS accredited PHE laboratory by courier, under a formal service level agreement. Samples for analysis are sent to the County Analyst, also UKAS accredited.



### 3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

The Council operates its infectious disease investigation policy in accordance with a protocol updated by The Food Group during 2015-16. There are regular liaison meetings between PHE and local authorities in Staffordshire.

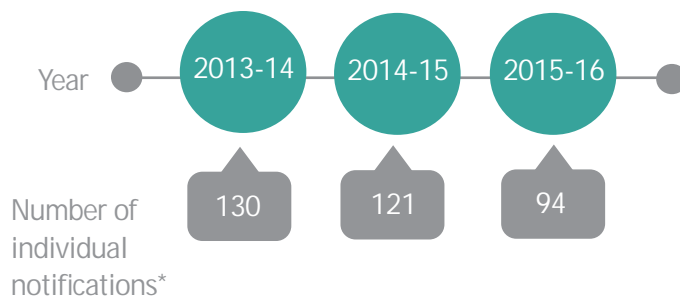
Our objectives in respect of this are:

- To administer and implement our statutory responsibilities relating to the control of infectious disease.
- Investigate notifications of confirmed food poisoning cases and likely sources of infection whether confirmed or not at the earliest opportunity.
- Where a source is identified take appropriate action to ensure risk of spread is controlled.
- Protect the well-being of individuals at risk by taking action to contain the spread of infection and provide advice and information regarding personal hygiene, food handling and control of infection.
- Exclude those in high risk groups in consultation with the Consultant for Communicable Disease Control (CCDC).
- A Countywide "Outbreak Control Plan" is operated including standardised food poisoning investigation questionnaires.



Over recent years, the Section has received, on average, 115 notifications of food poisoning, or suspected food poisoning, each year. The majority of these, in line with national figures, are Campylobacter cases (approximately 70%). In order to address the high proportion of Campylobacter cases, both locally and nationally, and to link with the FSA national Strategy on Campylobacter reduction, we delivered a 12 month project in 2014-15 based on visiting affected individuals in their homes.

Table showing trends in food poisoning or suspected food poisoning cases

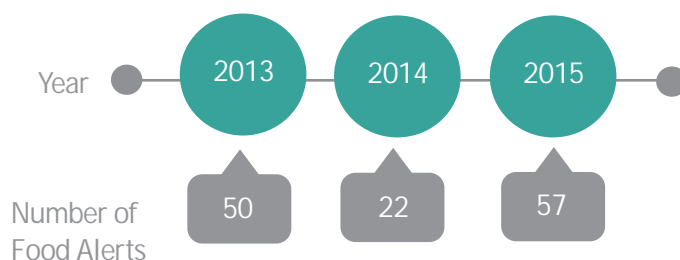


\* includes campylobacter questionnaires and visits

The Council's membership on the Control of Infection Committee and its close liaison with the Consultant for Communicable Disease Control (CCDC) ensure the adoption of a consistent approach throughout the Staffordshire area.

### 3.7 Food Safety Incidents

The Food Standards Agency declares food safety incidents from time to time and uses a "Food Alert" to advise authorities of the circumstances (for example a product withdrawal due to contamination) and the action required. Food Alerts may be either "For Information" (most common), or "For Action" (less common but requiring swift action to protect the public's health). The Council subscribes to the EHCNet electronic mail network and also receives hazard alerts by FSA e-mail and text messages. Food Alerts are actioned in line with the FSA Food Law Code of Practice and a procedure note explains to Officers how such incidents should be dealt with.





### 3.8 Liaison with other organisations

- The Council is represented on The Food Group (see Section 3.5), the PHE Health Protection Liaison Group and the Annual Water Quality Meeting with South Staffordshire Water.
- The Food Group provides a mechanism for discussion of relevant food matters, the provision of training on a county-wide basis, the formulation of policy, documentation and guidance and co-ordinated responses to Government and Central Agencies. The Group includes representatives from FSA, PHE, County Trading Standards and all local authorities within Staffordshire and Shropshire, including Stoke on Trent.
- There is an extensive network within both Staffordshire, Shropshire and the West Midlands, of informal officer contacts. This greatly assists with both consistency and adoption and sharing of best practice.
- The Council is fully committed to achieving consistency in enforcement, though will be guided by the systems thinking principles and our own enforcement policy.
- In 2014-15 we participated in extensive inter-authority audits on application of the Brand Standard and Use of Notices and are to participate in an inter-authority competency and monitoring audit in 2016. The officer resource allocated to these audits is considerable, with two officers each allocating up to 5 working days on each audit.
- The Section fully participates in activities and training arranged by the Food Group. In recent years we have participated in project work on imported foods and food fraud, consistency, and revision of outbreak control procedures.
- In 2016 we attended an FSA regional workshop on the future delivery of official controls;
- The Food and Safety Team participated in FSA on-line national consistency exercises in 2015 and 2016;



### Liaison within the Council

- All planning applications concerning food premises are forwarded to the Food and Safety Section via the Environmental Protection Section which has a formal arrangement with the Development Control Service.
- We have close links with Building Control, being involved in commenting on plans for new and existing food businesses. Our Council trade waste service notifies us if a business cancels or defaults on a waste contract so that we can ensure suitable alternative waste collection arrangements are implemented by the business. We also carry out "Duty of Care" Inspections as part of our food visits.
- We have close links with both private sector housing and the community safety team, and have assisted in dealing with unsafe accommodation and possible Child Sexual Exploitation (CSE) and illegal migration issues.

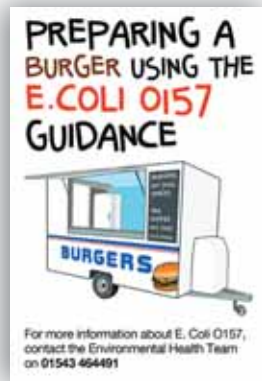
### 3.9 Food Safety Promotion Activity

- The team is involved in a programme of project work aimed at improving service delivery and contributing to better health outcomes. During 2014-16 we have delivered the following:



- Since the E.coli O157 outbreak in South Wales in 2005, and the issuing of FSA Guidance, the priority in all food hygiene inspections has been raising awareness to ensure all businesses are controlling the risks from this potentially fatal bacterium. All relevant businesses are made aware of the FSA's E.coli O157 guidance.

- We delivered a project in 2013-14 with our Butchers on E.coli awareness, including delivery of an awareness training session and subsequent visits to all butchers and completion of an evaluation form.



- We have designed and produced a leaflet to raise awareness of E. coli, targeted at mobile units who sell burgers. This was hand delivered to all mobile caterers;

- We have designed and produced a leaflet for our restaurants to raise the awareness of E.coli - "What's on the Menu"; this was distributed to all local catering outlets;



- We produced a questionnaire and SFBB for our home-based cake makers and developed a risk based approach to how we rate the business. Once we have discussed the business over the telephone with the FBO we ask them to send photographs of their kitchen facilities to us. We review and carry out a table top risk rating where it is appropriate.

- We worked with the local street market provider to develop a SFBB for our Food Stalls. We agreed levels of training for their market managers so they could monitor the food hygiene compliance of their stalls. This work had now continued with a new provider.

- We have undertaken a targeted Campylobacter project, visiting affected residents in their homes, giving advice and carrying out a free home safety check; in the first 12 months of the project 92 Campylobacter cases were visited. Of these, we were able to speak face to face or by telephone with 67 cases (73%) as opposed to the 30% who responded to the old style questionnaire. Many potential risk factors were identified and addressed.

- We were involved in the review of the tender for the operation of a café in a local park. We had an opportunity to consider the food safety aspects of prospective businesses as well as learning more about the tender process.

- We attended events organised by a large supermarket and offered free hand wash demonstrations for the young people attending. The target audience were youth groups.

- We surveyed our town centres and high streets to identify rates of display for National FHRs stickers. We found 50% of premises with a rating of 3 or better were not displaying their rating and gave advice on the benefits of display;

- We have promoted free food safety checks at hc for residents through media etc.



- We attended a Community Safety event co-ordinated by the Staffordshire Fire and Rescue Services. We had a stall to promote food safety in the home and our free food safety check in the home.

- We have created and delivered innovative bespoke practical training sessions for Friends of Hednesford, a group working with vulnerable adults, with the aim of improving confidence through gaining knowledge of basic food hygiene.

- We have undertaken practical briefing sessions for NHS carers who go into domestic residences so they are more aware of food hygiene risks in the home.

- We have participated in Food Safety Week, using the communications guidance provided by the FSA and linking with the Council's social media accounts.

- We have presented the "food safety in the home" message to a local branch of the Multiple Sclerosis Society and Gracemoor Court Sheltered Housing Scheme residents.



# 4 Resources



## 4.1 Financial Allocation

The total costs of the Food and Safety Section\* 2015-16 are given in the table below.

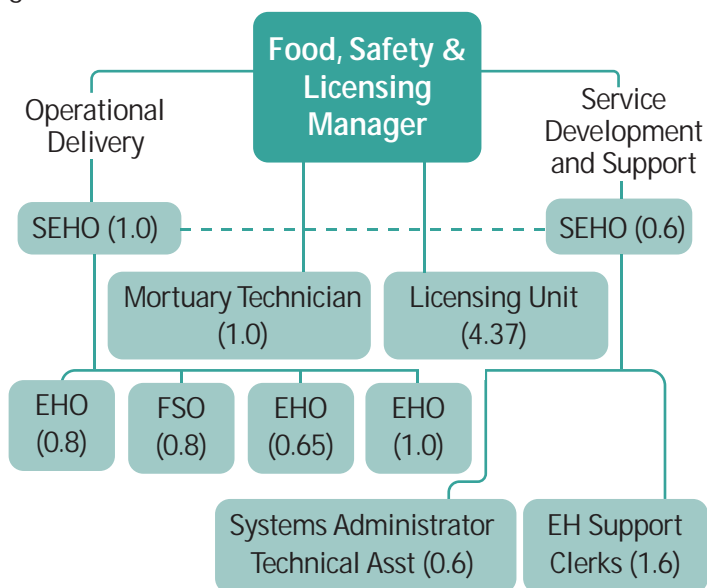
Cost Centre*	2015-16
Employee Costs	227,000
Transport Costs	8,000
Supplies and Services (Inc. software)	25,000
<b>TOTAL</b>	<b>260,000</b>

\* Cost Centre given includes food safety, health and safety, smokefree and some public health work, including contract funerals.

All legal action is dealt with by the Council's shared legal services function including advice and litigation with the cost of this service being recharged through the internal recharge system. Every effort is made to recover costs for successful prosecutions and time spent in preparing evidence is recorded with a schedule of costs being presented for payment upon conviction.

## 4.2 Staffing Allocation

The Organisational Chart of the Food and Safety Section is given below.



The Food & Safety Team consists of a total of 6 members who between them equate to 4.85 full time equivalent (fte) Officers. It is estimated that, of these, approximately 2.40 fte are engaged in delivering the food service.

All Officers carrying out official controls and associated duties have the baseline qualification of a Higher Certificate in Food Control, a BSc. MSc. or Diploma in Environmental Health, together with a Certificate of Registration from the Environmental Health Registration Board (EHRB); All officers have been assessed against, and meet, the new minimum competency requirements detailed in the Food Law Code of Practice (2015).

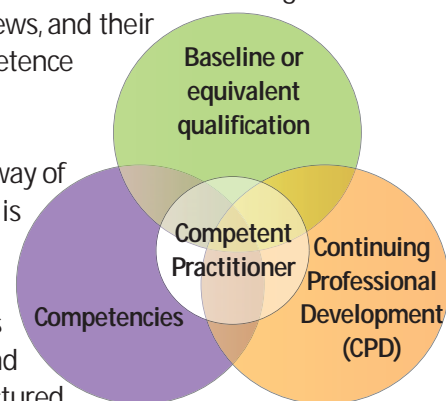
The Systems Administrator / Technical assistant performs a regulatory support role, assisting with delivery of the AES programme, informal sampling and other non official controls and with database verification / surveys. This post is a 0.6 fte and, of this, approximately 0.1 fte is available for food safety related duties.

## 4.3 Employee Development Plan

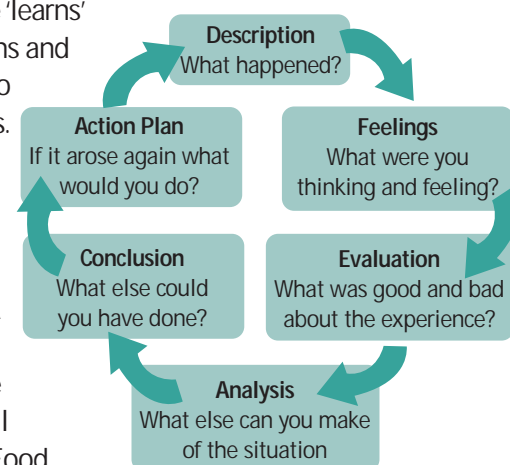
All employees are included within the Council's Personal Development Review (PDR) process, where performance is appraised and development needs are identified.

Training and development is delivered in accordance with the Section's Competency Requirements. The requirement in the Food Law Code of Practice for a minimum of 20 hours Core / Other CPD will be built in to the training programme. Officers have the opportunity to access external courses as determined following Personal Development interviews, and their Assessment of Competence monitoring.

We believe the best way of ensuring consistency is ensuring officers are competent and are able to discuss issues with peers; to that end we hold regular structured reflection sessions where officers discuss relevant cases / issues with colleagues to ensure a consistent approach is achieved; we capture 'learns' from these discussions and incorporate these into our working practices.



We are fully committed to officer training and make extensive use of FSA free training and on line resources where possible to ensure all officers fully satisfy Food Law Code of Practice requirements; we have also hosted FSA courses on UKFSS.



A record is kept of all training related to food safety or other relevant subjects that would improve the effectiveness and efficiency of the officers performing food safety enforcement. All training undertaken is reviewed as to its usefulness and practical applications and feedback to other officers is done as necessary.

# 5 Quality Assessment





## 5.1 Quality Assessment and internal monitoring

The quality of services delivered is directly linked to the competency and attributes of officers. Reflective practice is used in the Food & Safety Team to aid group and individual learning. Within a team environment, the opportunity is gained, through double-loop learning, to capture and share tacit knowledge and insight gained by field officers. This is of great value to the organisation, as it offers the possibility of innovation through incorporating tacit knowledge into services. An environment exists within which value can be added through group learning and critical reflection of practice, which then is more likely to lead to changes in behaviour amongst the team, leading to service improvement.

### Our Principles

Our work is governed by the following fundamental principles:

#### Risk-based approach:-

➔ Focus on critical control points

➔ Flexibility to do the right thing

➔ Actions proportionate to risk

➔ Purpose driven

#### Do the right thing:-

➔ Be human

➔ Trust employees

➔ Two way communication

➔ Respect (colleagues and customers)

➔ Cause no harm

➔ Don't break the law

➔ Be supportive (to colleagues)

In adopting the above principles, we have now identified that in many cases the risk rating applied to a premises was incorrect, as the previous inspection method did not allow the full identification of risks. It was found that FBOs may have learned answers to questions from inspection pro-formas, or felt the need to conceal the true practices through a mistrust of Officers. This in effect resulted in an incorrect assessment of risk and, consequently, incorrect frequency of inspection.

### Monitoring

The Section has fully documented procedures which are subject to regular review, to assist with meeting The Standard and in addition to the above, a range of measures are used to ensure quality of services, and compliance with procedures including:

- accompanied visits;
- team meetings;
- audits of reactive / response work;
- monitoring of Notices served

The Section has in 2015 participated in an extensive inter-authority audit on the Brand Standard, and will in 2016 participate in another covering officer competency and monitoring.

Our recently introduced Authorisation and Competency of Officer Procedure has clear guidance on expectations and an interview together with collated evidence is required.



## 6 Review





## 6.1 Review against the Service Plan

Performance measures are submitted quarterly to the Head of Environmental Health. The key local food service performance indicator is the percentage of food businesses which, when inspected, are broadly compliant. The current figure at March 2016 is 99%.

A range of local indicators are used to effectively “manage the business” and these are reviewed quarterly. Subject to resources, and to unforeseen urgent work demand, such as major reactive issues, we expect to deliver 100% of all due interventions in high-risk (A and B) medium risk (C and D) and lowest risk (E) rated premises in accordance with FSA expectations. Where our resources are unable to fully meet this planned delivery, we will prioritise according to risk.



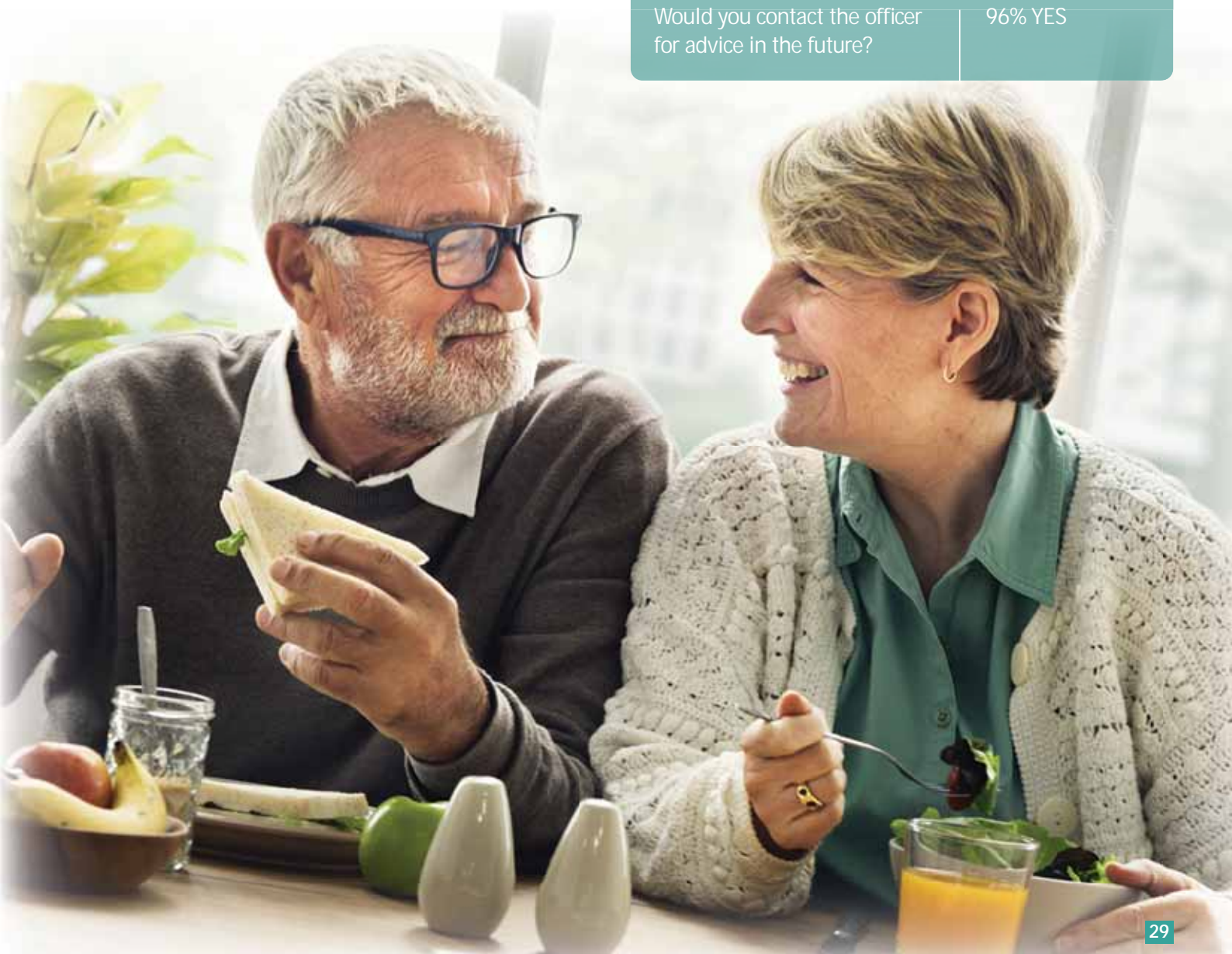
## Customer satisfaction

An extensive exercise was carried out in 2016 to determine food business' satisfaction with the current service. Results are shown below, and show clearly that businesses value our service and that our service delivery results in businesses making positive changes to improve compliance.

Many of those interviewed have spent many years working in the food industry. Having had first hand experience of the old inspection regime and now the revised approach they all commented on the positive changes they have experienced during their most recent intervention.

### Results of 2016 Business Survey and Evaluation

Customer Survey Question	Response
Were you treated fairly?	100% YES
Was the Officer polite?	100% YES
Were the visits helpful for your business?	100% YES
Would you contact the officer for advice in the future?	96% YES





## Key Questions Analysis

A number of questions in the survey give a more critical insight into the progress made by the service toward reaching its goal -

“  
To help our businesses provide safe food.  
”

These are considered in more detail below.

## Did the demonstrations help you about food safety?

Analysis - 77% answered positively, 7.5% weren't sure, 15.5% indicated the question wasn't applicable to them.

**Commentary** - The key here was there were no negative responses. Those that indicated the question wasn't applicable were those that had not had demonstrations as part of their intervention (demonstrations are not always required or appropriate as part of an intervention, especially when the business already has a high star rating). Those that weren't sure previously had a rating of 5 and therefore the demonstrations may not have had such an impact as they would in a business where the star rating was lower.



## Have you implemented any changes as a result of the visit(s)?

Analysis - 77% answered positively, 11.5% answered negatively, 11.5% indicated the question wasn't applicable to them.

**Commentary** - All of those that replied negatively to this question were either previously a five star business and therefore had no significant changes to implement or were of a nature where food production was extremely limited and, on that basis, would not require or benefit from any changes. (For example a children's nursery simply providing toast, juice and other very low risk food items)



## Performance against response targets

Requests for service (RFS) in relation to the food safety service have a response time of 24 hours, three or five working days, depending on risk priority. The local performance indicator is to meet the response times 95% of the time. Performance for 2015-16 against target is shown in the table below.

Response Priority	RFS received*	RFS responded to within target	%
1 day (same day)	62	60	96.7
3 days	110	108	98.1
5 days	386	384	99.5
Total	558	552	98.9

\* shows RFS numbers for all work of Food and Safety Team

## 6.2 Areas for Improvement

The systems thinking approach will be continually reviewed using our measures, and service improvements introduced accordingly. We hope to expand the application of the principles to our wider service areas.

A key area for improvement is our engagement with businesses and the public and we hope to use consultation to identify areas of improvement that will be valued by our customers.







## Contact Us

Cannock Chase Council  
Civic Centre, Beecroft Road,  
Cannock, Staffordshire  
WS11 1BG

tel **01543 462621**

[www.cannockchasedc.gov.uk](http://www.cannockchasedc.gov.uk)

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