

<b>Report of:</b>	<b>Head of Environmental Health</b>
<b>Contact Officer:</b>	<b>David Prosser-Davies</b>
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<b>Portfolio Leader:</b>	<b>Health &amp; Wellbeing</b>
<b>Key Decision:</b>	<b>No</b>
<b>Report Track:</b>	<b>Council : 16/11/16</b>

**COUNCIL**  
**16 NOVEMBER 2016**  
**APPROVAL OF FOOD LAW ENFORCEMENT SERVICE PLAN 2016-18**

**1 Purpose of Report**

- 1.1 In accordance with the current Constitution, to seek Council approval of the revised Food Law Enforcement Service Plan 2016-18 (The Plan).

**2 Recommendations**

- 2.1 That Cannock Chase District Council approves The Plan, at Appendix 1, detailing service demand and arrangements for delivery, monitoring and review;
- 2.2 That the Head of Environmental Health be authorised to make any amendments to The Plan required due to changes in legislation or government guidance and minor variations to The Plan in the interests of service improvement or operational efficiency.

**3 Key Issues and Reasons for Recommendation**

- 3.1 The report seeks Council approval of The Plan, in accordance with the Constitution (Section 4 (4.2)(a)(ix).
- 3.2 The Plan describes how our food hygiene service will be delivered and how we will meet the needs of businesses and members of the public.
- 3.3 Whilst it was formerly a requirement that The Plan be approved by full Council, current guidance suggests that "...such Plans should be approved at the relevant level established for the local authority, whether that is Member, Member forum, or suitably delegated senior officer level." (Framework Agreement, 2010).

## 4 Relationship to Corporate Priorities

4.1 The Plan contributes to Council priorities through:

### **Better Jobs and Skills:**

- 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;

### **Better Health Outcomes:**

- Ensuring food is safe and without risks to health;
- Investigating infectious diseases and food poisonings;
- Advising residents of food hygiene issues in the home;
- Project work focussing on wider health and wellbeing issues.

## 5 Report Detail

5.1 Cannock Chase Council's Food Safety Service Plan for 2016-2018 (The Plan) 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 the FSA [Framework Agreement](#) which together set out the Agency's expectations on the planning and delivery of local authority food law enforcement.

5.2 The overriding aim is to ensure that all food made, sold and consumed in Cannock Chase District is safe. Officers in Environmental Health work with local businesses to achieve improvements in food safety, hygiene, and reduce food poisoning. Compliant businesses are supported and non compliant businesses are identified and tackled so they do not gain unfair competitive advantage or put consumers at risk.

5.3 The Food Hygiene work of Environmental Health has recently been recognised in a Guardian news article, (September 2016) which confirms Cannock Chase District is in the top 10 in the Country, ranked by the proportion of food premises that pass inspections. Article available here: <https://www.theguardian.com/world/2016/sep/23/revealed-uk-takeaways-fail-food-hygiene-tests-restaurants-takeaways>

5.4 The Objectives of The Plan can be summarised as:

- Complying with the Food Standards Agency Framework Agreement;
- Contributing to the Food Standards Agency Strategy 2015-120?
- Maintaining an up to date database of all food businesses in the District;

- Complying with the Food Law Code of Practice when carrying out inspections and interventions;
- Reflecting on and constantly improving how we deliver services;
- Promoting the National Food Hygiene Rating Scheme ([www.food.gov.uk/ratings](http://www.food.gov.uk/ratings)) and uploading inspection reports to the local [www.ratemyplace.org.uk](http://www.ratemyplace.org.uk) website;
- Ensuring all Officers fully satisfy national competency requirements;
- Delivering a programme of consistent, risk-based, proportionate regulation;
- Responding to food alerts from the Food Standards Agency;
- Providing free advice and support to food businesses;
- Investigating food complaints and incidents of food poisoning;
- Assisting in the investigation and control of infectious disease outbreaks;
- Preventing consumption of unfit, hazardous or non compliant food;
- Participating in regional and national food sampling programmes;
- Undertaking projects aimed at improving wider health outcomes;

#### 5.5 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;

#### 5.6 Content of The Plan

##### 5.6.1 The Plan is drafted in accordance with the FSA Framework Agreement and contains the following sections:

###### Foreword

A general introduction to the Plan from the Health and Wellbeing Portfolio Leader. This explains overall aims, our links to national and local priorities, and our work with the Local Enterprise Partnerships. Our commitment to reducing burdens on local businesses and contributing the wider public health agenda is also outlined.

###### Service Aims and Objectives

As described in 5.3 and 5.4 above, together with links to corporate objectives and plans, as described in 4.1 above.

###### Background

This Section gives a local authority profile of the District, Organisation structure, scope of and demand on the service, together with information on the food

premises database, communications with business, our enforcement policy and the National Food Hygiene Ratings Scheme (FHRS).

Cannock Chase Council participates in the FHRS which allows the public 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 are satisfactory, or 'broadly compliant'. The website can be viewed at [www.ratings.food.gov.uk](http://www.ratings.food.gov.uk).

The vast majority of the District's food businesses are compliant with food safety requirements (99% of those inspected) and 87% are in the highest food hygiene rating category of 5. This is a reflection of the hard work and effort of officers and the excellent working relationship developed with local businesses.

### Service Delivery

Shows our Inspection Plan and explains how we will deliver our interventions for 2016-17, together with an explanation of our "systems thinking approach". The section also details examples of our promotional activity with businesses and members of the public.

The Food Standards Agency is currently reviewing the way in which enforcement activity is delivered nationally and much emphasis is being placed on behaviour change. The Council's Food & Safety Team are already adopting innovative ways of working. A "systems thinking" approach has been used which identifies the purpose of the service from the customer perspective. The food business operator was identified as the customer and the purpose as "helping our businesses provide safe food".

The Team differentiates between 'safe' and 'unsafe' non compliance, focussing on areas of risk and ensuring what they do is geared towards achieving purpose. 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 is at least satisfactory (rated 3). 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.

An independent evaluation exercise has been carried out into this approach (see Appendix 2) and Environmental Health are currently working with Wolverhampton City Council and the University of Birmingham on a further evaluation project, with a view to presenting findings to the FSA.

### Resources

This section outlines the costs of the service, together with staffing allocation and our commitment to employee competence and development;

## Quality Assessment

Outlines our approach to monitoring quality and consistency in service delivery, and the principles we adopt in our work, in particular our use of reflection to enhance knowledge and improve practice.

With effect from April 2016, revised mandatory national competency requirements have been introduced for all officers engaged in food law enforcement. In addition to meeting competencies in 5 key areas, or 'clusters' all officers must undertake a minimum of 20 hours Continuing Professional Development activity (CPD) each year. The Service Plan details the commitment to assessing officer competence and providing this CPD.

## Review

Outlines how we review our performance and details levels of customer satisfaction

An exercise was carried out in 2016 to determine food business' satisfaction with the current service (see Appendix 2). An extract of results is given below, showing that businesses value our service and that this results in businesses making positive changes to improve compliance. Many of those business proprietors have spent 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.

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 future?	96% YES

## **6 Implications**

### **6.1 Financial**

No implications. The Plan as drafted is deliverable within present budget.

### **6.2 Legal**

The production and publication of the Council's Food Law Enforcement Service Plan is required by the Food Standards Agency, which is acting under the powers vested in it by the Food Standards Act 1999. Approval of these Plans will ensure that the Council as a food authority meets its fundamental obligations under the requirements of the Agency's Official Controls Framework Agreement.

**6.3 Human Resources**

None

**6.4 Section 17 (Crime Prevention)**

Regulatory interventions within food safety premises serve not only to identify potential breaches of legislation, but to protect public safety and contribute to identification of wider crime and disorder, for example counterfeiting, child sexual exploitation, modern day slavery and immigration offences

**6.5 Human Rights Act**

None

**6.6 Data Protection**

None.

**6.7 Risk Management**

Adoption and monitoring of such Plans ensure the Council is able to effectively discharge its statutory regulatory functions.

**6.8 Equality & Diversity**

The Plans ensure consideration is given to equality in service delivery

**6.9 Best Value**

None.

**7 Appendices to the Report**

Appendix 1	Food Law Enforcement Service Plan (Draft).
Appendix 2	Evaluation of Systems Thinking Approach.

**Previous Consideration**

None

**Background Papers**

(Available to view in the Environmental Health Office, Lower Ground Floor.)

- Framework Agreement (FSA) (2010)
- Food Law Code of Practice (FSA) (2015)



# **Food Safety Service Plan**

## **2016 - 18**

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18**

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**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18****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*

## **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 ensure that 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).

Our primary service objectives:

- Complying with the Food Standards Agency Framework Agreement;
- Maintaining an up to date database of all food businesses in the District;
- Complying with the Food Law Code of Practice when carrying out inspections and interventions;
- Reflecting on and constantly improving how we deliver services;
- Promoting the National Food Hygiene Rating Scheme ([www.food.gov.uk/ratings](http://www.food.gov.uk/ratings)) and uploading inspection reports to the local [www.ratemyplace.org.uk](http://www.ratemyplace.org.uk) website;
- Ensuring all Officers fully satisfy national competency requirements;
- Delivering a programme of consistent, risk-based, proportionate regulation;
- Responding to food alerts from the Food Standards Agency;
- Providing free advice and support to food businesses;
- Investigating food complaints and incidents of food poisoning;
- Assisting in the investigation and control of infectious disease outbreaks;
- Preventing consumption of unfit, hazardous or non compliant food;
- Participating in regional and national food sampling programmes;
- Undertaking projects aimed at improving wider health outcomes;

### **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 undertaken a systems thinking review of our service, which identified food businesses as our customer. From this 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.

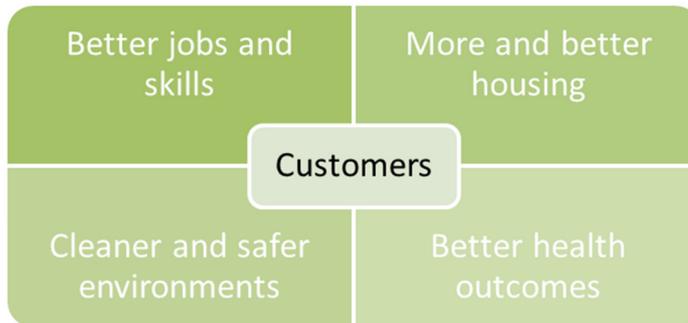
**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18**

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, 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).

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18**

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.

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%).

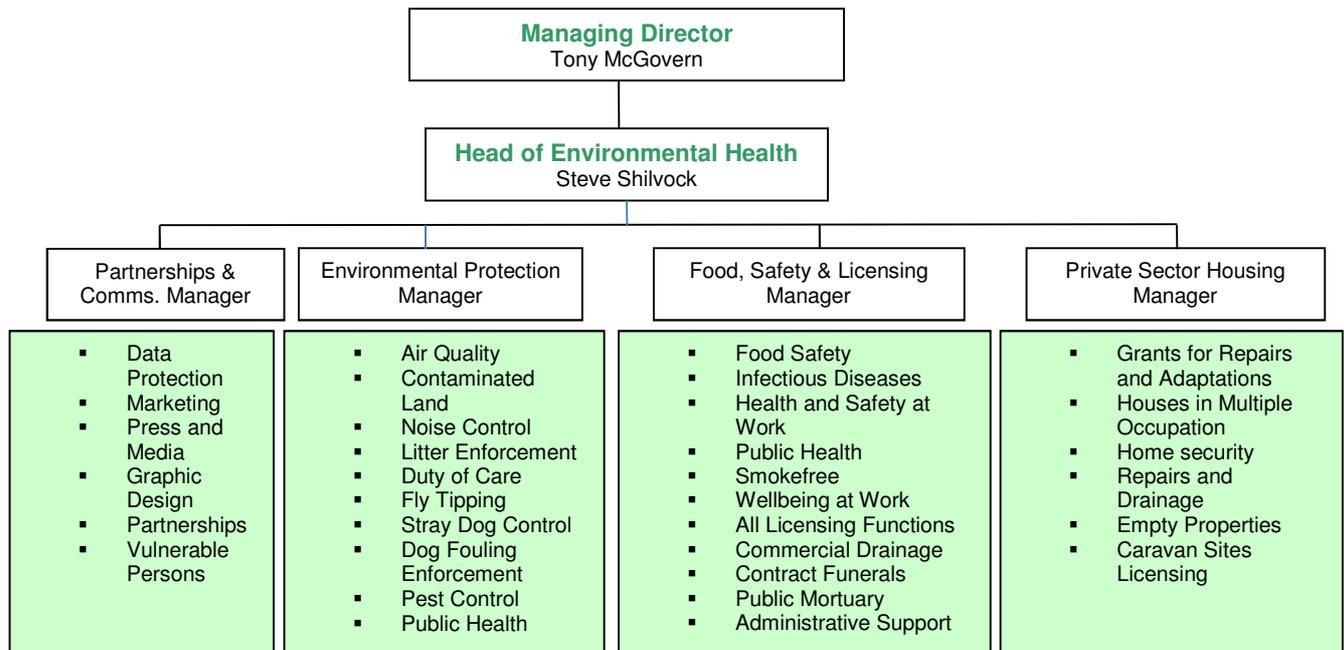
<sup>1</sup> Cannock Chase Locality profile 2016; <sup>2</sup> Cannock Chase District Needs Analysis 2016-17

## 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).

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18****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)

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[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)

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**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.

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18**

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: health and safety at work enforcement; 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>

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18****Risk profile of food premises**

<b>Risk Category</b>	<b>Number of Premises</b>	<b>Required Minimum Intervention Frequency</b>
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 4 premises subject to approval under Regulation 853, of which 3 are approved for meat products and one for fish products. Additionally there are 3 approved cold stores.

### Imported Food

The profile of our premises is such that our premises 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 "[Ratemyplace](#)" a website which allows members of the public and press to view Premises Inspection Reports.

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18****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
Total	728*

\*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	Hours	Contact details
Cannock Chase Council Civic Centre Beecroft Road, Cannock Staffs WS11 1BG	Mon, Tue, Weds, Thurs and Fri (09.00-17.00)	01543 462621 <a href="mailto:environmentalhealth@cannockchasedc.gov.uk">environmentalhealth@cannockchasedc.gov.uk</a> <a href="mailto:customerservices@cannockchasedc.gov.uk">customerservices@cannockchasedc.gov.uk</a>

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.

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18****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

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18**

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 year beginning 01 April 2016**

<b>Risk category</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>Other</b>	<b>Total</b>
<b>Number of Premises</b>	0	6	50	357	374	39	826
<b>Inspections Scheduled</b>	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:

<b>Risk category (Inspections due)</b>	<b>2016-17 Intervention</b>
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 incident investigations.

**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

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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**

From the above it will be seen that we rarely carry out formal 'revisits' as per the Food Law Code of Practice definition, since we will be working with the business to address any items of non compliance which present a significant risk. 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 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, providing advice and guidance and collecting information on the nature of the food activities.

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

- Consumer complaints;
- New food registration;
- Association with actual or suspected food poisoning;
- Food Alerts affecting products on sale;
- Planning / Building Regulation or Licensing Applications;
- Licensee / DPS change

<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)

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18****3.2 Food Complaints**

The 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.

Year	2013-14	2014-15	2015-16
<b>Number of Complaints</b>	<b>43</b>	<b>49</b>	<b>51</b>

**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. It should be noted that Officers within the Food and Safety Team also deliver the Primary Authority Partnership with Amazon covering health and safety regulation at all UK Fulfilment Centres, which also has potential to impact on service delivery.

**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;

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18****3.5 Food Sampling**

Microbiological food sampling is carried out to:

- determine 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

Year	2013-14	2014-15	2015-16
<b>Samples</b>	44	19	24
<b>Unsatisfactory Results</b>	12	0	3

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 revisited 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 the Public Health England. The Council contributes to, and participates in, any sampling programmes identified by The Food 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, or delivered to a despatch point by Authorised Officers. 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 where appropriate all notifications of confirmed food poisoning cases and likely sources of infection whether confirmed or not at the earliest opportunity.

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- 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

Year	2013-14	2014-15	2015-16
<b>Number of individual notifications *</b>	<b>130</b>	<b>121</b>	<b>94</b>

\*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 Food Law Code of Practice and a procedure note explains to Officers show such incidents should be dealt with.

Calendar Year	2013	2014	2015
<b>Number of Food Alerts</b>	<b>50</b>	<b>22</b>	<b>57</b>

### 3.8 Liaison with other organisations

- The Council is represented on the The Food Group (see Section 3.5), the PHE Health Protection Liaison Meeting, 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

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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 National Food Hygiene Rating Scheme (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 outbreak in South Wales in 2005, and the issuing of FSA Guidance, the priority of all food hygiene inspections has been raising awareness to ensure all businesses are controlling the risks from this potentially fatal bacterium. A major theme of our work is to ensure all relevant businesses are made aware of the FSA's E. coli O157 Control of Cross Contamination Guidance;

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18**

- 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 Safer Food Better Business pack 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 continues 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 home for residents through media etc. and have delivered ‘food safety in the home’ presentations to a local branch of the Multiple Sclerosis Society and Gracemoor Court Sheltered Housing;
- 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.

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- 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 carry out evaluation where possible and use the findings to inform and improve future service delivery.

## 4 Resources

### 4.1 Financial Allocation

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

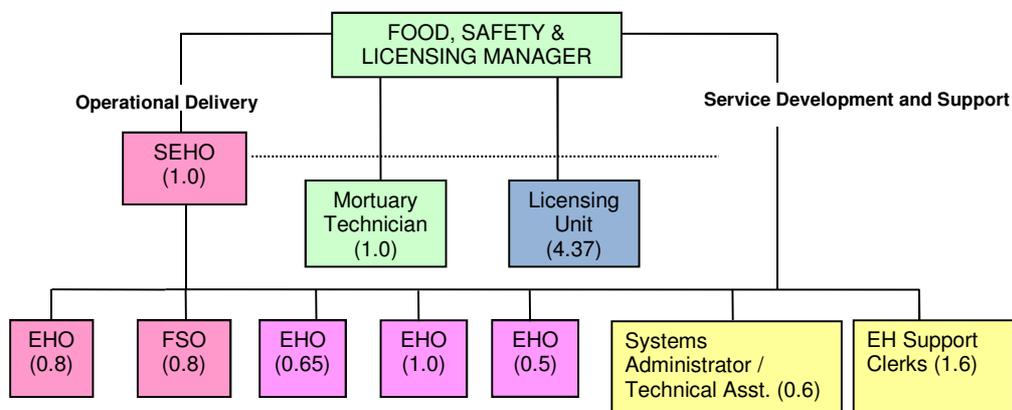
Cost Centre*	2015-16
Employee Costs	227,000
Transport Costs	8,000
Supplies and Services (Inc. software)	25,000
<b>TOTAL</b>	<b>260,000</b>

\* 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 and Safety Team consists of a total of 6 members (shown pink above) who between them equate to 4.75 full time equivalent (fte) Officers. It is estimated that, of these, approximately 2.40 fte are engaged in delivering the food service.

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All Officers carrying out official controls and associated duties have either a Higher Certificate in Food Control, 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 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.

Officers will be assessed against the Competency Framework and Clusters within the Food Law Code of Practice. This is by way of evidence gathered by the officers to demonstrate each relevant competency. Assessment will be by scrutiny of training records, practical application of knowledge and a discussion with the officers, all of which are recorded.

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.

Where appropriate, Officers will also complete the Regulators' Development Needs Analysis (RDNA) which is a competency and development framework designed to assess food safety enforcer competence and to ensure Enforcement Officers have the right skills for the job. A training programme will be designed for each authorised officer and appropriate training will be provided, utilising free or low cost training provided by the FSA or the Food Group.

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.

Officers are also currently engaged in the training and development of a Student EHO who joined the department in 2015. Officers allocate time to ensure the student meets required learning outcomes and competences in given areas.

## 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 and 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 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 in The Framework Agreement and in addition to the above, a range of measures are used to ensure quality of services, and compliance with procedures including:

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18**

- 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 on 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

Service Performance is ultimately set and monitored through the Scrutiny Committees. Performance is reported to the Cabinet Member for Health and Wellbeing and to Health Scrutiny Committee.

Monthly performance indicators are recorded by the FSLM and submitted quarterly to the Head of Environmental Health.

Achievement on high risk food safety inspections is a local business performance indicator. The target in the Environmental Health Service Plan for 2015-16 is 100% high-risk (A and B) food inspections. Actual performance was 100%. The Council has recently decided to set a maximum of 100% of medium (C and D) inspections and 100% of lowest risk in accordance with FSA expectations.

A further business performance indicator is the percentage of food businesses which, when inspected, are broadly compliant. The current figure at March 2016 is 99%.

### Customer satisfaction

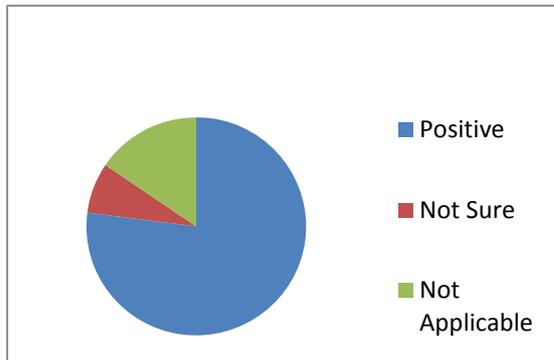
An extensive exercise was carried out in 2016 to determine food business' satisfaction with the current service. Results are shown below, and show clearly that businesses value our service and that our service delivery results in businesses making positive changes to improve compliance.

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

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18**



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.

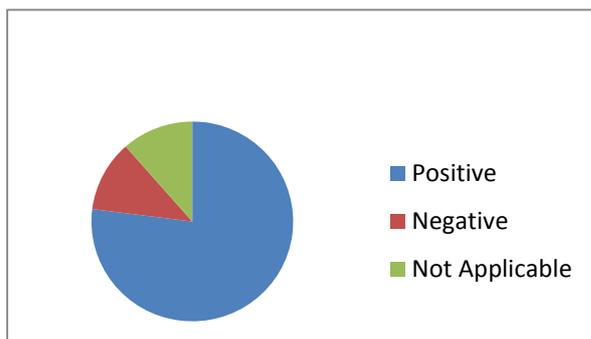
**Question 7 – Did the demonstrations help you with food safety?**

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 was not 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 were not 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.

**Question 8 – 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)

**CANNOCK CHASE COUNCIL FOOD SAFETY SERVICE PLAN 2016-18****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
<b>Total</b>	<b>558</b>	<b>552</b>	<b>98.9</b>

\* shows RFS numbers for all work of food and safety team

**6.2 Areas of 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.



# Review of Food Safety Systems Thinking Project

June 2016

## Cannock Chase District Council

### Systems Thinking Review

February / June 2016

Oliver Wassall – Complete Environmental Solutions Ltd

#### Brief

In January 2016 Complete Environmental Solutions Ltd was commissioned by Cannock Chase Council Environmental Health to undertake a review of the Food Hygiene Service and, in particular, the practical implementation of revised working methodologies realised as a result of the 'Systems Thinking' intervention undertaken during 2014.

The company director was selected to undertake the review for a number of reasons:

- His 28 years of experience in Environmental Health;
- His recent experience of running the Food and Environmental Safety service at a large metropolitan Council;
- His experience of undertaking Systems Thinking reviews for local authority services;
- His impartiality – he is not an officer of Cannock Chase District Council;

#### Hypothesis

That the Systems Thinking approach to the review of the Cannock Chase District Council Food Hygiene Service assists businesses in providing safe food.

This is facilitated via;

- Greater interaction time with the businesses
- Enhanced relationships with the food business operators
- A more practical approach to education and support
- An associated behavioural change promoting long term improvements in food hygiene practices

#### Background – Why did we do it?

**The Systems Thinking approach** – the Systems Thinking approach sets out to break down and analyse the way in which a service is delivered. The most fundamental element of this methodology is to first understand the purpose of the service. The subsequent review process then seeks to determine the parts of the intervention process that add value to the defined purpose i.e. those that assist in delivering the purpose, and the 'waste' steps i.e. those that detract or add no value to the delivery of the purpose.

For the Cannock Food Hygiene Service the purpose was "To help our businesses provide safe food". As part of the process that sought to deliver this purpose more efficiently and effectively the customers, i.e. the food business operators, were questioned to see which

parts of the historical intervention process were beneficial and which weren't helpful when trying to assist businesses produce safe food.

In summary, the traditional inspection process was found to be intimidating and intrusive and not conducive to good communication, accurate assessment of risk and positive working relationships. On this basis Cannock has implemented a service redesign with the customer experience central to its approach.

This independent service review sets out to determine whether the new intervention process has delivered the desired improvements.

### Review Methodology

The review process was undertaken in three stages –

- Client questionnaire and 'interviews'
- Officer discussions and
- File review

**Client questionnaire / interviews** – central to the revised way of working is the relationship between the food businesses operator and the inspecting officer. In order to determine how these relationships had altered it was necessary to talk to the proprietors of food businesses and the food handlers themselves. It was considered essential to talk directly to those involved in the actual intervention process wherever possible to ensure a 'first hand' understanding of how the interaction was secured.

**Selected premises analysis** – the food businesses to be visited were selected without any prior discussions with the inspecting officer. This was to ensure the interviews with the food business operators were undertaken with no preconceptions of the business, its food handlers or the nature or success of the intervention. A minimum of thirty visits were required to ensure a representative sample and to allow a cross section of food business types could be incorporated into the review. To allow some additional capacity thirty six premises were identified. The analysis of the businesses selected and their inspecting officers are set out below.

Premises Type	Number Selected
Butcher	2
Cafe	5
Care home	4
Grocer	1
Hotel	3
Nursery	4
Public house	3
Supermarket	1
Takeaway / restaurant	13
<b>Total</b>	<b>36</b>

It should be noted, for various reasons, it was not possible to visit all of the premises originally selected. A full list of the businesses visited is included in Appendix One

**Lead Officer Analysis** – The inspecting officers for the premises detailed above were as follows (officers are numbered to preserve anonymity)

<b>1</b>	13 interventions
<b>2</b>	12 interventions
<b>3</b>	2 interventions
<b>4</b>	6 interventions
<b>5</b>	3 interventions

#### **Officer discussions and file review**

Discussions were held with each of the lead officers to explore their experience of the Systems Thinking approach and the interventions they had undertaken since its implementation.

The premises files were also reviewed to assess the nature of the records maintained and to ensure these were a reasonable reflection of the actual intervention when compared to the food business operator and officer discussions.

## Customer Interviews – How did we do?

Questionnaire Analysis (See Appendix Three for full questionnaire)

### Question by question analysis and commentary

#### The Intervention

#### Questions included in the questionnaire regarding the intervention.

- Q1. Did you understand how we are changing the way we inspect businesses?
- Q2. Did the officer explain what would happen during the visit?
- Q3. Were you clear about what was expected of you after each visit?
- Q4. Did you feel comfortable being observed during the visit(s)?
- Q5. Did the officer explain what would happen at the end of each visit?
- Q6. Did you think the shorter visits were useful?
- Q7. Did the demonstrations help you understand about food safety?
- Q8. Have you implemented any changes as a result of the visit(s)?
- Q9. Will you carry on with the changes you made?
- Q10. Do you feel more confident about food inspections now?
- Q11. Did the visits help you produce safe food?

#### Results

Business	Question Number										
	1	2	3	4	5	6	7	8	9	10	11
<b>Caketins</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	NA	NA	NA	Yes
<b>Copperdown</b>	No	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes
<b>Subway</b>	No	NS	Yes	Yes	Yes	-	NS	No	NA	Yes	Yes
<b>Academy Early Years</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes
<b>Horsefair Care Home</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	No	Yes	No	Yes
<b>Meat To Please You</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes
<b>Holly's Cafe</b>	No	No	Yes	Yes	No	-	Yes	Yes	Yes	Yes	Yes
<b>Crackin' Cafe</b>	Yes	Yes	Yes	Yes	Yes	-	NA	NA	NA	Yes	Yes
<b>Needwood House</b>	Yes	Yes	Yes	Yes	NS	-	NS	Yes	NS	Yes	Yes
<b>Bridgtown Chippy</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes
<b>Woodland View</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes
<b>Red Peppers</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes
<b>Copper Kettle</b>	Yes	Yes	Yes	Yes	NS	-	Yes	Yes	Yes	Yes	Yes
<b>Newhall Farm inn</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes
<b>Tasty Bites</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes
<b>Puddleducks Day Nursery</b>	Yes	Yes	Yes	Yes	Yes	-	NA	NA	Na	Yes	Yes
<b>Melvyns Butchers</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes
<b>Moorhill Pre-School</b>	Yes	Yes	Yes	Yes	Yes	-	NA	No	NA	Yes	Yes
<b>Hednesford Lodge</b>	Yes	Yes	Yes	Yes	Yes	-	NA	Yes	Yes	Yes	Yes
<b>Cedar Tree Hotel</b>	Yes	Yes	Yes	Yes	Yes	-	NA	Yes	Yes	Yes	Yes
<b>Georgio and Vinny's</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	NS	Yes

<b>Pit Stop Cafe</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes
<b>Jaipur</b>	Yes	Yes	Yes	Yes	NS	-	Yes	Yes	Yes	Yes	Yes
<b>Wing Shun</b>	No	NS	NS	Yes	NS	-	Yes	Yes	Yes	NS	NS
<b>The Mediterranean</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes
<b>Spices</b>	Yes	Yes	Yes	Yes	Yes	-	Yes	Yes	Yes	Yes	Yes

## Notes

NA – Not applicable. NS – Not sure.

NB – Wing Shun – FBO's English is very poor and interview was undertaken using his daughter to translate.

## Analysis

- Question One – Only 3 negative responses.. 88.5% positive. No issues of concern.
- Question Two – Only 1 negative response. 96% positive. No issues of concern.
- Question Three – No negative responses (1 not sure). 100% positive. No issues of concern.
- Question Four – No negative responses. 100% positive. No issues of concern.
- Question Five – Only 1 negative response (4 not sure). 96% positive. No issues of concern.
- Question Six – Whilst it was envisaged an intervention would be made up of a series of short visits in the vast majority of cases the visit length was not reduced. On this basis the overall investment of officer time with the food business operator during an intervention has increased. In terms of enhancing the relationship with food business operators this is not considered detrimental. However, it does place a burden on officer resources. This may be partially offset by reduced administrative burden and visits becoming shorter as time progresses as a result of better communication with the food business operators and maintenance of high standards as a result. Both of these aspects will need to be monitored on an ongoing basis as part of the 'Measures' package Potential change over time (number and length of visits) Will need to monitor in measures to see impact.
- Question Seven – No negative responses (2 not sure and 5 not applicable – this is primarily a result of demonstrations not being undertaken during every intervention. This is not a matter for concern as demonstrations are not necessary or appropriate in all settings).
- Question Eight – Only 3 negative responses (3 not applicable). Not a matter for concern as some businesses which previously had a 5 star rating may not have any issues for improvement.

- Question Nine – No negative responses (4 not applicable and 1 not sure). Not a matter for concern as some businesses which previously had a 5 star rating may not have any issues for improvement. As a result there would be no necessity to maintain these changes.
- Question Ten – Only 1 negative response (food business operator has been 5 stars for a long period of time and has had a high degree of confidence in the inspection / intervention process in any eventuality). (1 not applicable and 2 not sure) No issues of concern.
- Question Eleven – Extremely positive result. Only one was unsure if the visits would help them produce safe food and the business operator spoke very poor English which may have accounted for the response.

### Theme Based Reviews

#### Method – Review of Questions 1, 2, 3, 4 and 5

**This group of questions covered the theme of the new intervention style and the nature of the interaction between the inspecting officer and the food business operator.**

In the main the responses were positive with most food business operators understanding the change of approach and what was expected of them. Many commented on the more relaxed communication style and a greater ability to put in place solutions that suited the business as well as reduce food hygiene risks.

Almost all said they felt more confident about the intervention process and indicated that maintaining consistency of the inspecting officer would improve these relationships even further as the officer builds a greater knowledge of the individual business and the food business operator strives to make more ongoing and positive changes to the way they operate.

#### Understanding and Behaviour Change – Review of Questions 6, 7, 8, 9, 10 and 11

**These questions focussed upon the food safety benefits, the reduction of risk and the changes implemented by the food business operator.**

The responses to these questions were extremely positive with the vast majority of food business operators feeling the method of delivering an intervention had been greatly enhanced through the Systems Thinking process. In particular they mentioned the key role of improved communication, the more relaxed style and the benefits secured from a more practical means of delivering change i.e. demonstrations as opposed to the traditional 'do it this way' approach.

In terms of any benefits derived from shorter visits almost all of the food business operators indicated the visits weren't actually any shorter than they used to be and there were, in most cases, more of them. Whilst increasing the amount of time spent with businesses is a fundamental element of the Systems Thinking approach it is hoped over time, as food business operators, with the help of their inspecting officer, implement and retain positive changes, the amount of time spent with, and the number of visits needed to complete an intervention, should reduce. Both of these aspects of service delivery should be monitored via the 'Measures' process.

### The Officer

#### Questions included in the questionnaire regarding the officer

- Q12. Do you think you were treated fairly?
- Q13. Was the officer polite?
- Q14. Were you kept informed of what was happening?
- Q15. Were the visits helpful for your business?
- Q16. Would you be happy to contact the officer for advice in the future?

### Results

Business	Question Number				
	12	13	14	15	16
<b>Caketins</b>	Yes	Yes	Yes	Yes	Yes
<b>Copperdown</b>	Yes	Yes	Yes	Yes	Yes
<b>Subway</b>	Yes	Yes	NS	Yes	Yes
<b>Academy Early Years</b>	Yes	Yes	Yes	Yes	Yes
<b>Horsefair Care Home</b>	Yes	Yes	Yes	Yes	Yes
<b>Meat To Please You</b>	Yes	Yes	Yes	Yes	Yes
<b>Holly's Cafe</b>	Yes	Yes	Yes	Yes	Yes
<b>Crackin' Cafe</b>	Yes	Yes	Yes	Yes	Yes
<b>Needwood House</b>	Yes	Yes	Yes	Yes	Yes
<b>Bridgtown Chippy</b>	Yes	Yes	Yes	Yes	Yes
<b>Woodland View</b>	Yes	Yes	Yes	Yes	Yes
<b>Red Peppers</b>	Yes	Yes	Yes	Yes	Yes
<b>Copper Kettle</b>	Yes	Yes	Yes	Yes	Yes
<b>Newhall Farm inn</b>	Yes	Yes	Yes	Yes	Yes
<b>Tasty Bites</b>	Yes	Yes	Yes	Yes	Yes
<b>Puddleducks Day Nursery</b>	Yes	Yes	Yes	Yes	Yes
<b>Melvyns Butchers</b>	Yes	Yes	Yes	Yes	Yes
<b>Moorhill Pre-School</b>	Yes	Yes	Yes	Yes	Yes
<b>Hednesford Lodge</b>	Yes	Yes	Yes	Yes	Yes
<b>Cedar Tree Hotel</b>	Yes	Yes	Yes	Yes	Yes
<b>Georgio and Vinny's</b>	Yes	Yes	Yes	Yes	Yes

<b>Pit Stop Cafe</b>	Yes	Yes	Yes	Yes	Yes
<b>Jaipur</b>	Yes	Yes	Yes	Yes	Yes
<b>Wing Shun</b>	Yes	Yes	NS	Yes	
<b>The Mediterranean</b>	Yes	Yes	Yes	Yes	Yes
<b>Spices</b>	Yes	Yes	Yes	Yes	Yes

### Analysis

- Question 12 – No negative responses.
- Question 13 – No negative responses.
- Question 14 – No negative responses (2 not sure)
- Question 15 - No negative responses.
- Question 16 – No negative responses.

Question 16 is important since it encapsulates the nature of the relationship between the FBO and the EHO.

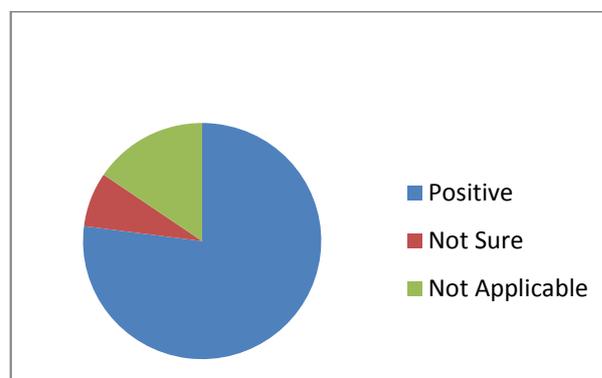
The results are extremely encouraging because many businesses were traditionally reticent to contact the Food Safety team. The fact that all those interviewed would now be happy to contact their inspecting officer (and several have already done so!) demonstrates the improved relationships, lines of communication and supportive approach is working.

### Critical Question Analysis

A number of questions in the survey give a more critical insight into the progress made by the service toward reaching their goal – “To help our businesses provide safe food”. These are considered in more detail below.

**Question 7** – 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.

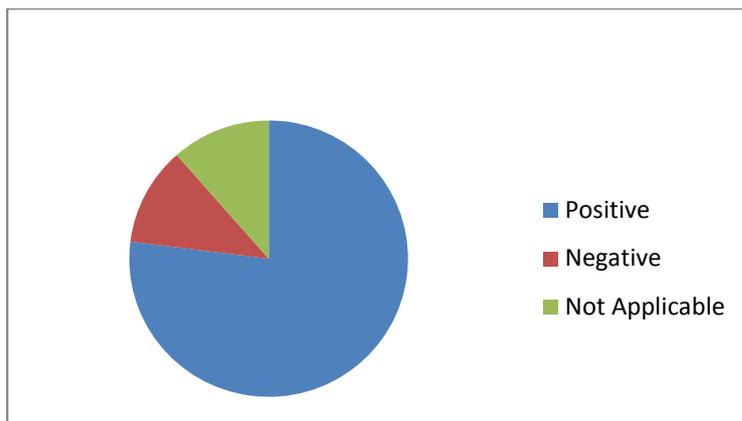


Commentary – The key here was there were no negative responses. Those that indicated the question wasn’t applicable were those that had not had demonstrations as part of their

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.

**Question 8** – 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.

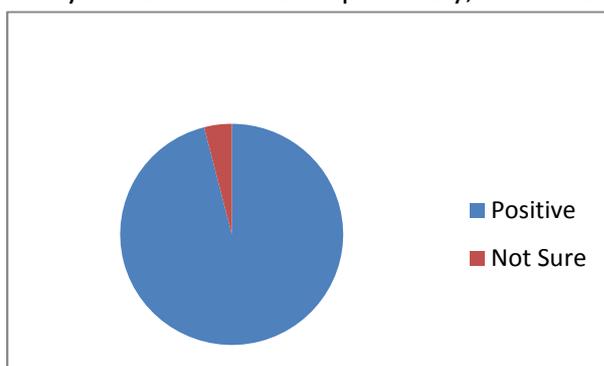


Commentary – All of those that replied negatively to this question were either previously a five star business and therefore had no significant changes to implement or were of a nature where food production was extremely limited and, on that basis, would not require or benefit from any changes. (For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

Of those that felt the question wasn't applicable one was a relatively new business still in the developmental stage – effectively all the measures put in place during the intervention were new and agreed between both parties. The other had no changes to make as a result of the intervention.

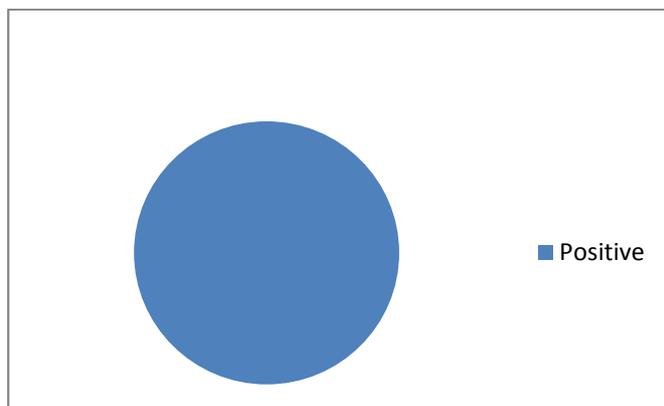
**Question 11** – Did the visit(s) help you produce safe food?

Analysis – 96% answered positively, 4% weren't sure.



Commentary – There was only one business that didn't give a positive answer. Unfortunately, the food business operator's English was very poor. It is therefore possible that the non committal answer was a result of a lack of understanding rather than a negative commentary on service delivery.

**Question 16** – Would you be happy to contact the officer for advice in the future?



Analysis– 100% answered positively.

Commentary – This question, and the answers to it, were considered the most critical. Historically, the view of many food business operators toward local authority food safety services was one of concern, distrust and, in some cases, fear. In such circumstances food business operators were extremely reticent about contacting the food safety service for advice or support. This was borne out during discussions with the food business operators forming part of this review.

The results of the dialogue with food business operators after the Systems Thinking review showed a significant shift in this regard with all of those questioned indicating they would contact the service if they needed advice; in fact several of the businesses have already done so. This is extremely encouraging and shows a significant behavioural shift.

There are several reasons for this shift including;

- Better working relationships with food business operators.
- Enhanced communication methods and practical guidance.
- A less 'hostile' approach to regulation in favour of a supportive and educational stance.

Solutions are not simply imposed. By spending more time with businesses to arrive at solutions that not only reduce risk but are also more compatible with the way the business routinely operates FBO's are more likely to seek advice knowing they will play a significant role in developing answers that suit them as well as the food hygiene service.

### Officer / Premises Record Review – What were the officers findings and experiences?

From the questionnaire analysis above it is clear there is a high degree of satisfaction with the officers themselves in terms of how they are perceived by the food business operators.

#### Officers' perceptions –

All of the inspecting officers and their Team Leader were interviewed after the business visits had been completed to

- secure their views of the Systems Thinking approach,
- discuss the outcomes of the interactions with the food businesses and
- examine the supporting paperwork resulting from their interventions.

It was clear from these discussions all of the officers felt the migration to the new way of working via the Systems Thinking process, was a positive move. This despite the fact some found the transition difficult and, at times, frustrating.

The use of the ST methodology is now accepted as 'the norm' and there is evidence of the officers using the same principles in other areas of their work. The ongoing delivery of the service is not without issues however. These matters have been discussed with the service managers and they had already been recognised to varying degrees.

They include

- inconsistency and frustration with the 'reflection' process
- inconsistency in the recording of the visits (although the recollection of the visits were broadly in accordance with the FBO's memories of how the interventions were delivered) and
- variability in the officers individual styles and personalities. Whilst recognised as inevitable this can create tensions within the team. However, such variability can also be considered positive. If one officer's approach is not having the desired effect then there is the scope, even within this relatively small group, to try a different style.

When the views and comments of the food businesses interviewed were shared with the officers they appeared to be genuinely surprised and encouraged by the degree of support for the new way of working. The use of Systems Thinking is now routine and it may be the benefits perceived by the food business operators have not been fully recognised by the officers who deliver the service as part of 'the day job'. Taking the opportunity to share some of these comments was a useful reminder of the positive changes they have made.

Overall the officers' perceptions of the service are a reflection of those shared by the food business operators and whilst there are still some minor issues to address (and managers have begun work in these areas) the change has been well received by all those involved.

## Overall Findings

As can be seen from the results of the interviews and questionnaire analysis the food business operators experience of the revised intervention methodology and their relationship with the inspecting officer is extremely encouraging.

Many of those interviewed have spent many years working in the food industry. Having had firsthand 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. Key themes included:

- A recognition that the Cannock Food Team have radically changed their approach to food safety interventions for the better
- The changes have promoted a more trusting and relaxed working relationship
- A more supportive rather than confrontational approach
- The more relaxed approach produces an environment more conducive to positive change.
- Enhanced learning from practical demonstrations and advice
- A better understanding of the business, and therefore the risks associated with it, made possible by investing more time with the business
- Appreciation of risk is also enhanced by observing the various stages of the food preparation process.
- Many businesses have changed the way they operate after working collaboratively with the EHO's and, more importantly, these changes have been maintained as part of the businesses ongoing routine.
- Businesses can gain recognition for improvements, which is reflected in their star rating, by assessing risk and risk mitigation at the end of an intervention.

On this basis the review and revised intervention methodology are considered to be an improvement. They have produced a positive and constructive relationship with the local food industry. The amended procedures should therefore be maintained subject to a number of minor recommendations which are set out below.

## Recommendations and Next Steps

- **Enforcement Activities** – it should be noted none of the premises visited during the process were subject to formal enforcement action. Whilst this regulatory approach is only necessary in a very small number of cases it is suggested a future review focusing on such premises may prove beneficial. This, on the basis that it is these businesses where the Systems Thinking approach has been unsuccessful; hence the need for legislative enforcement. In this regard discussions with the proprietors of these establishments might highlight why the approach was unsuccessful and provide some insight into how different approaches to the more educational, practical and supportive role may be deployed to better effect in the future.

- **Post intervention correspondence** – the new approach correctly focuses resources on the persons actually producing the food whether this is via observation, demonstration or discussion. This should be maintained when the final advisory correspondence is sent to the business. It is therefore recommended in cases where reports are sent to a business owner or manager or a head office a copy should also be made available for the kitchen staff themselves. This ensures those directly responsible for the rectification of contraventions, or implementation of recommendations, know what is required of them (or in cases where there are no contraventions they are given the appropriate credit). This does not currently happen in all cases; nurseries and care homes in particular.
- **Workwear** – the service has introduced chefs 'blacks' which are used alongside the traditional 'whites' during inspection. There seemed to be a degree of inconsistency around when they are used. A number of businesses, notably cafes and restaurants, commented on the impression the use of white coats gives when customers are present i.e. that there is a problem when one doesn't necessarily exist. When the inspecting officer is very visible to the businesses customers the business should be given the choice of officer workwear.
- **Inspecting officer** – Most of the food business operators in the survey suggested consistency of inspecting officer was a significant advantage in terms of working relationships, ongoing communication and dialogue and the officers understanding of the businesses operation. Whilst it is appreciated the inspecting officer cannot always be consistently retained efforts should be made to do so 'where possible'
- **Review of 'reflection' process** – The reflection process; a mechanism by which officers jointly review and share experiences gained during interventions, has become somewhat jaded according to the officers interviewed. Opportunities for enhancing the reflection process need to be explored in more detail and, if appropriate, amended.
- **Review of 'Measures'** – In addition to this review the Systems Thinking review is subject to ongoing monitoring via a range of 'measures'. A comprehensive review of the measures selected by CCDC should be undertaken to assess progress and form the baseline for identifying trends and progress in the future.
- **Further review when next round of visits are occurring ?** It is understood the service is now beginning to undertake secondary interventions with businesses that have already been the subject of a first Systems Thinking style inspection. It would be sensible to undertake a further review of these businesses to assess what is now becoming the 'norm'. This needs to establish
  - That the approach is being maintained
  - The approach is consistent across the service
  - Whether improvements previously made are being maintained
  - Whether the selected measures are appropriate, the trends they are highlighting and the implications this may have for the resourcing of the service in the longer term.

- **Member endorsement** - The service may wish to seek formal recognition and support for the new way of working and the thoughts of the trade by reporting these findings to an appropriate Member body.

### Conclusions

The Systems Thinking review and the subsequent change of approach during interventions with the local food businesses has undoubtedly had a marked effect upon food business operators' perceptions of the food hygiene service and its officers.

Many of those interviewed had experience of the 'old way' of working and now the 'new way'. Without exception every one of those FBO's agreed the revised approach was far better than the previous inspection regime.

It promotes it enhances good relationships and communication, enhanced problem solving and learning and has a positive impact on food safety. Food business operators are now much more likely to liaise with their inspecting EHO if they need advice or support. This is considered to be an essential measure of the success of the scheme; all parties involved are, at the end of the day, seeking the same outcome – to help the business provide safe food.

## Appendix One

## List of Food Businesses Visited

<b>Business</b>	<b>Address</b>	<b>Premises Type</b>
<b>Caketins</b>	Upper Brook Street, Rugeley	Cafe
<b>Copperdown</b>	Church Street, Rugeley	Care home
<b>Subway</b>	Western Springs Road, Rugeley	Take away
<b>Academy Early Years</b>	Power Station Road, Rugeley	Nursery
<b>Horsefair Care Home</b>	Horsefair, Rugeley	Care home
<b>Meat To Please You</b>	Indoor Market, Rugeley	Butchers
<b>Holly's Cafe</b>	Indoor Market, Rugeley	Cafe
<b>Crackin' Cafe</b>	Norton Canes Business Park, Cannock	Cafe
<b>Needwood House</b>	Stafford Street, Cannock	Care home
<b>Bridgtown Chippy &amp; Silly Sausage Cafe</b>	North Street, Cannock	Cafe
<b>Woodland View</b>	Longford Road, Cannock	Care home
<b>Red Peppers</b>	Horsefair, Rugeley	Restaurant
<b>Copper Kettle</b>	Cannock Shopping Centre	Cafe
<b>Newhall Farm inn</b>	Lichfield Road, Cannock	Public house
<b>Tasty Bites</b>	John Street, Wimblebury	Takeaway
<b>Puddleducks Day Nursery</b>	Anglesey Street, Hednesford	Nursery
<b>Melvyns Butchers</b>	Hednesford Road, Heath Hayes	Butchers
<b>Moorhill Pre-School</b>	Pye Green Road, Cannock	Nursery
<b>Hednesford Lodge</b>	Anglesey Street, Hednesford	Public house
<b>Cedar Tree Hotel</b>	Main Road, Brereton	Hotel
<b>Georgio and Vinny's</b>	Orbital Plaza, Cannock	Restaurant
<b>Pit Stop Cafe</b>	Delta Way, Cannock	Cafe
<b>Jaipur</b>	The Lightworks, Cannock	Restaurant
<b>Wing Shun</b>	Horsefair, Rugeley	Takeaway
<b>The Mediterranean</b>	Brook Square, Rugeley	Takeaway
<b>Spices</b>	Walsall Road, Cannock	Restaurant

## Appendix Two

**Notable Food Business Operator Comments**

- 'The officer was extremely helpful and supportive and i would have no hesitation to contact her if i needed help'
- 'I have been in the industry over twenty years and the last visit was one of the best I've had'
- 'Because of the relaxed approach even the junior staff were much more comfortable and relaxed very quickly'
- 'The change from the old way of doing things to the new was dramatic'
- 'The old way of inspecting was a nightmare'
- 'Actually asking the food businesses opinion is really good'
- 'With the old style my heart was in my mouth; it was panic. The new way is very different and we were quickly put at ease'
- 'It was like the old officers had tunnel vision – we now have a much more open and honest relationship'
- 'I've been in the business a long time and it's the best inspection I've ever had'
- 'Inspections were very stressful – we're much more comfortable with the new process'
- 'I've been in the business 15 years and I learnt more during the last visit than I did in the previous 14 years worth'

## Appendix Three

**CCDC Food Hygiene Inspection and Systems Thinking Evaluation****How have we done?**

It is important that we evaluate our progress so far in the Systems Thinking process. This means evaluating:

- The level of compliance in our businesses now compared to before, and the sustainability of change that was observed during the inspection process.
- Ourselves and our own development.

There will be two parts to the evaluation process.

**PART ONE**

The evaluation will be undertaken by an officer who was NOT the Lead officer at the last inspection.

**Before** going to the business the officer will need to review:

- the latest inspection summary sheet
- notes made on the individual visits to the business by the Lead officer
- the record of intervention measures undertaken

The officer can make brief notes on the Evaluation Record Sheet overleaf.

**Whilst** at the business the officer will:

Firstly observe the way of working of staff in the kitchen, where possible, and try and gauge the level of compliance and sustainability of the outcomes of measures which were known to have been introduced during the inspection process.

Secondly ask open questions of staff and the FBO regarding key measures which were undertaken and gauge the success or otherwise of long term implementation of new ways of working for the business.

**PART TWO**

This will include feedback from the business **via subsequent e-mail survey, telephone or during an evaluation visit** regarding the new way of working, what worked and what didn't. The business may not feel comfortable feeding back at the time of your visit.

Evaluation Record

Part One – to be completed by the evaluating officer before and during the visit.

**Before the visit**

Business Name			
Date of Inspection:	Lead Officer:	Number of visits:	Rating:
Intervention measures:			
Notes from Flare entries:			
Improvements still required in inspection report			

**During the visit**

Date of evaluation	
Same FBO or different	<b>NB. if the FBO has changed record details, give registration form, do not continue with evaluation.</b>
Observation outcomes	One, or possibly two, contraventions (taken from 4c's) from the previous intervention will be identified; the officer will focus on these and how they are currently being addressed. If this is not possible it may be appropriate to use "show me" for some items.
Improvements sustained, outline those that have been and those that have not.	

**Part Two – to be completed with the Food Business**

Please think about the food hygiene visit(s) made to you and answer the questions below.

**Please circle your response.**

1	Did you understand how we are changing the way we inspect businesses?	YES	NO	NOT SURE
2	Did the officer explain what would happen during the visit(s)?	YES	NO	NOT SURE
3	Were you clear about what was expected of you after each visit?	YES	NO	NOT SURE
4	Did you feel comfortable being observed during the visit(s)?	YES	NO	NOT SURE
5	Did the officer explain what would happen at the end of each visit?	YES	NO	NOT SURE
6	Did you think the shorter visits were useful?	YES	NO	NOT SURE
7	Did the demonstrations help you understand about food safety?	YES	NO	NOT SURE
8	Have you implemented any changes as a result of the visit(s)	YES	NO	NOT SURE
9	Will you carry on with any changes you made?	YES	NO	NOT SURE
10	Do you feel more confident about food inspections now?	YES	NO	NOT SURE
11	Did the visits help you to produce safe food?	YES	NO	NOT SURE
<b>Thinking about your overall experience of the food hygiene service</b>				
12	Do you think you were treated fairly?	YES	NO	NOT SURE
13	Was the Officer polite?	YES	NO	NOT SURE
14	Were you kept informed of what was happening?	YES	NO	NOT SURE
15	Were the visits helpful for your business?	YES	NO	NOT SURE
16	Would you be happy to contact the Officer for advice in future?	YES	NO	NOT SURE
If you answered <b>NO</b> to any of these questions we would like to find out what didn't work for you. Please try and explain what has prevented you making changes if they were required and we will try and help you.				
If you answered <b>YES</b> please say if there was anything particularly that you think worked well or give examples of changes you made				

**Thank you for your help**