



Stroud District Council

Food Service Plan

2015-2016

A Service Plan for the Food Safety Section of the Environmental Health Service based on the Food Standards Agency's Framework Agreement on Local Authority Food Law Enforcement.

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Stroud District Council

Food Service Plan

1. Service Aims and Objectives

1.1 Aims and Objectives

The over-riding goal of the Commercial Services Unit, in line with the Council's Corporate Aims, is to maintain and improve the community's health. To this end the Commercial Services Unit will effectively utilise its resources to ensure that food and drink for human consumption which is supplied in the District is safe and without risks to health. Moreover, the Commercial Services Unit will use its influence, when appropriate, to promote awareness of the importance of diet and nutrition in ensuring a healthy lifestyle.

The Commercial Services Unit will achieve this aim by: -

- ensuring that food premises are regularly inspected in accordance with national inspection frequency criteria and that legislative controls are consistently and effectively applied in all the premises it inspects.
- giving encouragement to food business proprietors to adopt and implement the principles of hazard analysis with suitable controls at critical points. The Section will develop or support initiatives to improve the understanding of the principles of hazard analysis and hence increase the likelihood of their successful adoption by food businesses.
- recognising the importance of the legal requirement for food handlers to be properly trained or given instruction and supervised commensurate with their duties. Officers will actively enforce this requirement and promote or offer hygiene training courses locally and at reasonable cost.
- implementing a local programme of food sampling and participating in national food sampling schemes in an effort to identify potentially dangerous levels of bacterial contamination in locally produced foods.
- investigating reports of food contamination, food poisoning or food borne illness and endeavouring to prevent the continuance or recurrence of any factors giving rise to the reported incident.
- promoting the development of a wider understanding of ill-health issues associated with food allergy and hypersensitivity and encouraging proprietors to implement sensible controls in the preparation and sale of foods.
- promoting the availability of healthy food choices on the menus of catering establishments in the District.
- responding quickly and appropriately to national food hazard warnings.

1.2 Links to Corporate Objectives and Plans.

The Council's Corporate Delivery Plan 2015-19 with the simple vision "to make Stroud District a better place to live and work for everyone", and this is put into effect through implementing the key priorities reproduced in Fig 1.

Ensuring high standards of food safety is an important means of maintaining and improving the community's health but, as the Food Standards Agency maintains, safe food is better for business to.

The Council recognises that regulation can have a significant influence on the profitability of small and medium sized enterprises and in support of the key priority "to grow the local economy and increase employment" the Council has adopted enforcement policies, which incorporate the principles of good enforcement set out in the Enforcement Concordat. For example, the Council has undertaken to minimise the cost of compliance for businesses and individuals by ensuring that any action taken is proportionate to the risks or wider public benefit and the Council will carry out its duties in a fair and equitable and consistent manner.

Fig 1. Key Priorities

1. Economy: Help local people and businesses grow the local economy and increase employment.
2. Affordable Housing: provide affordable decent and social housing
3. Environment: Help the community minimise its carbon footprint, adapt to climate change and recycle more.
4. Resources: Provide value for money to our taxpayers and high quality services to our customers
5. Health and Wellbeing: Promote the health and wellbeing of our communities and work with others to deliver the public health agenda.

The Corporate objectives are enabled through various strategies and service plans, of which this Food Service Plan forms part. National and local performance indicators are used to measure key service objectives set out in the service plans.

2. Background

2.1 Profile of the Local Authority

The District Council covers an area of 45,318 hectares and has a population of approximately 109,000. It is bounded on the west by the River Severn rising to the Cotswold escarpment to the east. To the North the district borders Gloucester City and to the South it extends to Berkeley and Wotton-under-Edge.

It is a mixed urban and rural area with 5 main towns - Stroud, Stonehouse, Wotton-under-Edge, Dursley and Nailsworth - numerous villages and a number of industrial estates. Many of the towns and villages lie within the Cotswold area of outstanding natural beauty. There are 42 conservation areas, including an industrial conservation area.

2.2 Political and Organisational Structure

There are 51 District Councillors who represent 30 wards. An administration has been formed from an alliance of Labour, Liberal Democrats and Green groups. Food safety enforcement work falls within the remit of the environment committee.

The Commercial Services Unit is part of the Environmental Health Service which is divided into 4 functional sections – Commercial Services, Environmental Protection, Housing Renewal and Licensing – supported by an administration team.

Jon Beckett, Head of Environmental Health has overall control of the Service, which deals with most of the traditional environmental health core functions, including private sector housing, pollution control, food safety, health and safety, the dog warden service and licensing. He is responsible for control of budgets and resource allocation for the food safety service.

Phil Park, Commercial Services Manager is responsible for the management of the Commercial Services Unit and is the Council's appointed food safety lead officer for the purposes of the Food Safety Act 1990. As well as dealing with food safety enforcement and promotion the team is also responsible for health and safety in non-food premises, communicable disease control and street trading activities. The CSM also manages the Council's pest control service and provides an in-house health and safety advisory service to the Council.

1.5 FTE Principal Environmental Health Officer posts and 1.5 Food and Safety Officers are appointed to carry out the functions of the Section and hold a variety of qualifications. Their responsibilities vary accordingly – see table below. In 2015/16 one food and safety officer will be on sabbatical for approximately 6 months. The Head of Environmental Health will seek authority to partly-fill this vacancy using suitably qualified contractors.

Post	Qualifications	Responsibilities and authorisation	Comments
Area 1			
Principal Environmental Health Officer (part-time)	Degree in Environmental Health. EHRB registered.	Day to day management of Area 1. Inspection of full range of food premises, including specialist processes. Service of Statutory Notices. Deputises for CSM.	
Food and Safety Officer	Degree in Environmental Health. (not EHRB registered. Limited authorisation)	Alternative Intervention of Category D-E food premises. Food sampling.	
Area 2			
Principal Environmental Health Officer	Degree in Environmental Health. EHRB registered.	Day to day management of Area 2. Inspection of full range of food premises, including specialist processes. Service of Statutory Notices. Deputises for CSM.	
Food and Safety Officer	Degree in Environmental Health EHRB registered.	Inspection of Category C-E food premises.	

The Commercial Services Unit is supported by a Business Support Officer and a team of 3 clerical assistants, who also provide support services to the rest of the Environmental Health Service.

The Commercial Services Unit is represented on the Gloucestershire Food Safety Group (GFSG) by the CSM. Meetings are regularly attended by colleagues from the

other 5 District Councils in the County, the Gloucestershire County Council Trading Standards Department, the Public Health England Laboratory Service.

The Council has arranged to use the Public Health England Laboratory Services located in Birmingham for microbiological examination of food and Worcestershire County Council Scientific Services for other food analysis.

2.3 Scope of the Service.

As the Council is not a Unitary Authority, functions such as food standards and animal feedingstuffs do not form part of its remit. Otherwise the Council aims to provide a full range of services offering a balanced approach between education and enforcement.

The Commercial Services Unit is responsible for carrying out the functions described in Table 1 below.

Table1: Food Related and Other Services undertaken by the Commercial Services Unit.

Food Related Services	Other Activities
Food Premises Inspections in accordance with FSA Code of Practice	Health and Safety inspection of Commercial Premises.
Investigation of complaints relating to food and food premises.	Investigation of health and safety complaints and accidents arising at those premises.
Food sampling (including participation in national sampling programmes).	Provision of health and safety training courses and seminars.
Investigation of food poisoning cases.	Provision of a Public Burial Service.
Initiating and responding to national food hazard warnings.	Participation in the Council's emergency planning arrangements.
Liaison with other local authorities with respect to food produced outside the District.	Investigation of drainage and nuisance complaints arising from commercial premises.
Application of the Home Authority Principle.	Provision of an in-house health and safety advisory service.
Provision of advice and guidance to food businesses.	Responding to relevant planning and building applications.
Provision of food hygiene training courses and seminars.	Administration of Street Trading Consents.
Administration of the FSA Food Hygiene Rating scheme	Responding to land registry enquiries.
Liaison with food business proprietors, consumers and other health professionals.	Pest Control Services
Approval of product specific food premises.	Investigation of infectious diseases (e.g. legionnaires disease)
Port Health – Ship inspections; verification of organic feed imports, docks water supply.	Port health – rabies control; waste disposal arrangements, infectious disease controls.

2.4 Demands on the Food Service.

The profile of food premises in the District on 1st April 2015 is outlined in Table 2 below.

The majority of food premises in the District are small or medium sized enterprises (SMEs) employing less than 50 staff. Nevertheless, many of them are involved in the

preparation of high-risk foods and require frequent monitoring. Inevitably SMEs have fewer resources to carryout in-house monitoring and do not have the access to technical assistance available to larger food businesses or multi-national groups. Food Safety Officers may, therefore, find themselves spending a disproportionate amount of time working with smaller businesses than with much larger companies.

Leisure and tourism are important contributors to the local economy and the hotel and catering industry account for 71% of the food premises in the District. A small proportion of these are seasonal guesthouses.

Table 2: Profile of 1247 Food Premises in the District on 1st April 2015.

	Category of premises	Primary producers	Manufacturers & Packers	Importers & exporters	Distributors & Transporters	Retailers	Restaurants & Caterers	Total
Premises ratings	Cat A	0	0	0	0	2	4	7
	Cat B	0	9	0	0	10	63	82
	Cat C	1	19	0	1	30	307	358
	Cat D	0	17	1	2	46	179	245
	Cat E	1	46	2	12	120	347	528
	Unrated	0	8	1	1	10	40	60
	Outside programme	1	0	0	0	1	2	4
	Total	3	100	4	16	219	942	1284

5 business are currently approved under specific regulations (Regulation EC 853/2004). These premises are listed in Table 3.

Table 3: Premises Approved under Regulation EC 853/2004).

Business Name & Ref Number	Location	Description	Approval No
Church Farm cp2825	Church Rd, Leonard Stanley, GL10 3NP	Dairy products manufacture (cheese)	GS009
Clarkes Farm Cp 2882	Longney Road, Hardwicke, GL2 3SQ	Dairy products manufacture (cheese)	GS019
Dairy Crest Ingredients Ltd cp0599	Oldends lane Stonehouse, GL10 2DG	Dairy products manufacture.	GS003
Dairy Partners cp2468	Stroudwater Business Park, Stonehouse, GL10 3SX	Dairy products manufacture	GS006
FA Gill Ltd	Oldends lane, Stonehouse GL10 2DG	Cold store	GS020

There are also a wide variety of food manufacturers and specialised food producers in the District which do not require product specific approval. Examples of these are listed in Table 4.

Table 4: Examples of Food Manufacturers and Specialist Producers

Business Name & Ref Number	Location	Description of products
Kerry Ingredients & Flavours Ltd cp0395	Draycott, Cam, GL11 5NA	Dried flavouring ingredients.
Bottle Green Drinks Co Ltd Cp2591	Frogmarsh Mills, South Woodchester, GL5 5ET	Flavoured soft drinks and cordials
Woefulthane Organic Dairy cp2446	Woefulthane Farm, Minchinhampton, GL6 9AT	Organic dairy products
Winstones Ice Cream cp0903	Greenacres, Stroud, GL5 5BX	Ice cream
Cotswold Handmade Meringues cp2660	Terretts Mill, Nailsworth, GL6 0RF	Meringue nests
Jonathon Crump Cp2397	Orchard House, Standish GL10 3DG	Unpasteurised cheese.

Establishments operated by ethnic minorities, whose first language is not English, account for a relatively small proportion of the food businesses in the District. Nevertheless, access to foreign language food hygiene courses locally is poor and the nearest translation service is in Gloucester.

The Council's Services are delivered exclusively from the Council Offices, Ebley Mill, Stroud. There are currently no "area offices". Information about food safety services is also posted on the Stroud District Council web-site www.stroud.gov.uk and includes a wide range of "frequently asked questions".

2.5 Enforcement Policy

The Commercial Services Unit carries out its duties in accordance with the Environmental Health Enforcement Policy. The general enforcement policy incorporates the principles of good enforcement practice embodied in the Enforcement Concordat. A guidance leaflet, summarising the enforcement policy, is provided to business proprietors whenever enforcement action is taken.

[Ref. Commercial Services Unit Manual, Policy No 1.1 "Enforcement Policy"]

3. Service Delivery - Food Premises Inspections and Interventions

3.1 Introduction

The enforcement of food hygiene regulations is governed by the Food Law Code of Practice and associated practice guidance issued by the Food Standards Agency. The Code of Practice allows authorities some flexibility in how to secure compliance with food safety legislation, particularly in lower risk premises. For example, it permits local authorities to replace standard inspections, in certain categories of premises, with a range of alternative interventions.

3.2 Interventions

The Code defines the different types of interventions that Food Authorities may use and the circumstances in which they should be applied.

Interventions are key to improving compliance with food law by food business operators. The range of interventions allows authorised officers to use their professional judgement to apply a proportionate level of regulatory and enforcement activities to each food business.

Interventions should be applied in a risk-based manner such that more intensive regulation is directed at those food businesses that present the greatest risk to public health.

This follows the 'Five Principles of Better Regulation' for regulatory enforcement – proportionality, accountability, consistency, transparency and targeting [*Reference: The Report 'Regulation –Less is More reducing burdens, improving outcomes'*]

Interventions are defined as activities that are designed to monitor, support and increase food law compliance with a food establishment.

3.3 Official Controls

Interventions that are Official Controls [as specified by Article 10 of Regulation 882/2004] include:

- Inspections;
- Monitoring;
- Surveillance;
- Verification;
- Audit; and
- Sampling where the analysis/examination is to be carried out by an Official Laboratory

The intervention must provide sufficient information to establish that food-related activities carried out at food establishments comply with the law. The intervention must be carried out at all stages of production, processing and distribution.

3.4 Other Interventions

In addition to 'official controls', interventions also include other activities that are effective in supporting food businesses to achieve compliance with food law such as:

- education, advice, and coaching provided at a food establishment; and
- information and intelligence gathering.

More than one type of intervention may be carried out during a single visit to a food business establishment.

Officers should record the basis for the choice of intervention(s) used in the premises file. Where more than one intervention is carried out at the same time Officers should ensure that the most appropriate intervention for monitoring purposes is recorded on the computer system.

3.5 Intervention Rating Scheme

The risk assessment scheme in Annex 5 of the Code of Practice is used to determine the type of interventions appropriate to each category of premises.

The risk assessment profile for food premises in Stroud District Council together with the estimated number of interventions to be completed in 2015/16 is detailed in Table 5 below.

Premises with an intervention rating of A or B should be subjected to an inspection; partial inspection or audit at the prescribed interval.

Where a premises is rated C and is considered to be broadly compliant² planned interventions can alternate between inspection/partial inspection, audit and other official controls. However, the use of alternative interventions for Category C premises can only be used when a premises is judged to be “broadly compliant”. Broad compliance is based on the specific ratings given for compliance using criteria in Annex 5 of the statutory code of practice, i.e. how well the operator is complying with food safety standards at the time of the inspection.

Category D premises should be subject to an intervention at intervals prescribed in the code of practice. Such interventions can alternate between an intervention that is an official control and an intervention that is not an official control. For the time being all premises that are not broadly compliant will be subjected to an inspection; partial inspection or audit.

Category E premises need not be included in the planned intervention programme but must be subject to an alternative intervention every 3 years. Premises that have not been the subject of an intervention within the previous 3 years will be sent a self-assessment questionnaire together with advisory material. Resources permitting, category E premises will be subject to an official control at least every 10 years.

Table 5: Intervention Plan for 2015/16.

Intervention Risk Category (examples of types of premises)	Number of Interventions due in 2015/16	Over-due interventions c/fwd from previous years	Minimum Intervention Frequency	Type of interventions applicable
A <i>High risk premises such as restaurants, which have a very poor compliance record.</i> <i>7 premises</i>	14	0	6 months	Inspection, partial inspection or audit
B <i>Larger residential care homes and manufacturers of high risk foods. High risk premises with fair to poor compliance record.</i> <i>82 premises</i>	82	2	12 months	Inspection, partial inspection or audit

C <i>High risk premises with good to fair compliance record (public houses, schools or restaurant etc).</i> 358 premises	302	30	18 months	Broadly compliant: Inspection, partial inspection or audit Not broadly compliant: Alternate with other official controls
D <i>Lower risk premises such as general grocers and public houses with snacks only.</i> 248 premises	89	14	2 years	Broadly Compliant: Inspection, partial inspection or audit Not broadly compliant: Alternate with other interventions
E <i>Low risk premises such village shops and clubs.</i> 528 premises	317	181	AES ¹	Self- assessment questionnaire or inspection after 7years
Un-rated/Outside Programme 60 premises	69	0	N/A	To be inspected as soon as possible.
1284 premises	873	227		

¹ Alternative enforcement Strategy.

The approach will involve sending a food safety questionnaire to these businesses to assess the food safety risk posed by the business. Responses will be assessed to determine whether any further action is required.

² Broadly compliant in respect to food hygiene is defined as an establishment that has an intervention rating score of not more than 10 points under the Level of (Current) Compliance – Hygiene and Level of (Current) Compliance – Structure and Confidence in Management/Control Systems.

A national performance indicator NPI 184 was introduced in 2008/09 based on the percentage of premises found to be broadly compliant at the time of inspection. This is no longer a national PI but it has been kept as a local performance indicator in the Council's Corporate Delivery plan for 2015/16. On 31st March 2015 1176 of the 1284 premises (including 69 unrated premises) in the district were found to be broadly compliant at the time of inspection (i.e. 91.6%). This is considered to be a high level of compliance and will be difficult to improve on given the high turn-over in the ownership of catering businesses.

In 2006/07 the Gloucestershire Food Safety Group received over £300k in funding from the Food Standards Agency to deliver free workshops and coaching sessions to caterers to help them to introduce a new food safety management system - Safer Food Better Business. Food safety management is a legal requirement of the Food Hygiene (England) Regulations 2006. When the grant funded project ended in June 2007 the Council's contractors CMI had carried out one to coaching visits in over 150 local catering businesses. Officers now assist new businesses with implementation of food safety management systems and a DVD is available in many languages which can be used as a teaching aid.

On 1st April 2015, 398 inspections were due in the year in order to meet the prescribed inspection frequencies for high risk, Cat A to C premises. [Note: Category A premises require 2 inspections per year]. The "percentage of high risk premises

due for inspection that were inspected” has been adopted as a local performance indicator for 2015/16.

Table 6 summarises the inspection performance in 2014/15 and the number of inspections due in the year 2015/16.

Table 6: Food Premises Inspection Performance in 2014/15

Risk Cat'	No premises at 01/04/2014	Inspection frequency	Interventions Achieved	Due Interventions Outstanding	No premises at 01/04/15	Interventions Due in 2014/15
A	3	6 months	37	0	7	14
B	93	12 months	135	2	82	86
C	436	18 months	333	30	358	302
D	145	2 years	61	14	245	89
E	511	3 years*	94	181	528	317
Unrated	75		118	-	60	69
Total	1247		778	227	1284	873

* AES = alternative enforcement strategy

The level of inspection activity required in 2015/16 [873, including some premises that can be dealt with by alternative interventions] will require enforcement staff to carry out approximately 24 interventions per officer per month, which could be achieved with a full establishment. Approximately 3.0 FTE officers are available for food safety enforcement work.

The Commercial Services team has employed the following alternative interventions:-

- “spot check” inspections of premises with a good history of compliance (i.e. officers sample a number of criteria which are critical to food safety and if found to be satisfactory the inspection is cut-short). Surprisingly, some food business operators object to this approach as they feel the inspection has been cursory and a waste of their time.
- a self-assessment questionnaire is sent to the lowest risk food businesses together with guidance documents. Proprietors are asked for details about their food handling activities and the control measures in place. Questionnaires help to keep the information management system up to date but in practice less than 50% of questionnaires are returned and many of them are only partially completed. Many of the Category E premises currently due have previously failed to return a form and will require a visit.

If inspections reveal significant food safety risks or contraventions of legislation officers will revisit to ensure compliance. Inspections are generally unannounced and Officers also revisit, at a mutually convenient time, to discuss complex issues such as hazard analysis. It is estimated that the above inspection program will involve approximately 150 revisits to premises to check compliance and to discuss issues with the proprietor.

Officers within the Commercial Services Unit possess all the necessary expertise to carry out enforcement activities in the premises in the District and assistance from specialists from outside the authority is not usually required. Officers are encouraged to attend training courses and seminars to maintain and improve their professional

competence and technical training requirements are assessed during the annual appraisal.

[Ref. Commercial Services Unit Procedure Note 2.1 “Food Hygiene Inspections].

3.2 Food Complaints

Complaints from the public generally fall into two categories – complaints about hygiene in food premises and complaints from customers who have purchased defective food. Hygiene complaints are dealt with in accordance with the Councils policy, which requires a response within 3 working days. However, because the evidence relating to food complaints can deteriorate very quickly officers try to respond on the same day.

Food complaints can be very time consuming and often involve liaison with other local authorities, when food has been manufactured outside the District. Similarly, officers are expected to respond to requests from other local authorities about food manufactured locally but sold elsewhere.

Table 5: Food Service Requests in 2014/15 v 2013/14

Job Type	Sub-Type	2013/14	2014/15
Food Complaint	All categories	28	14
Food Hygiene	Hygiene Complaint	54	52
Food Hygiene	Training/advice	3	1
Food Hygiene	New Business Advice	108	109
Food Hygiene	Tuberculosis in Cattle	106	93
Food Hygiene	FSA Food Alerts	30	36
Food Hygiene	Food Export Certificates	399	207
Food Hygiene	Other (e.g. consumer advice)	43	45
Total		771	557

In 2014/15 the Commercial Services Unit dealt with 14 food complaints and 52 complaints about food hygiene in premises in the District. 109 new business sought advice.

A fee is charged for the issue of export certificates but one of the main exporters moved the manufacture of some of its products to another site in 2014 and demand for export certificates may decline further in 2015/16. Demand for other services should remain at a similar level to last year. Demand for the Service can be met from within existing resources.

[Ref. Commercial Services Unit Procedure Note 2.2 “Procedure for Dealing with Food Complaints].

3.3 Better Regulation and the Primary Authority Scheme

LBRO was incorporated as a government-owned limited company in May 2007. Following the commencement of the Regulatory Enforcement and Sanctions Act on 1 October 2008, it now operates an executive non-departmental public body, accountable to the Department for Business, Innovation and Skills (BIS) through the Better Regulation Executive.

The LBRO aims to stimulate and support effective performance in environmental health, fire safety, licensing and trading standards. Its specific brief is to reduce the regulatory burdens on business, while maintaining or even enhancing the current levels of public and environmental protection.

LBRO's recent publication, "Better Local Regulation: Supporting Businesses Towards Recovery", sets out how regulatory services are best placed to deliver four key approaches to moving towards recovery:-

- Using direct relationships to signpost local businesses to appropriate support and guidance
- Using face-to-face engagement to understand local businesses' diverse issues and challenges and feed this information into local economic assessments
- Taking an intelligence-led approach to targeting activity on the particular opportunities and threats faced by local economies and communities
- Developing collaborative approaches that deliver shared local and national priorities

Better regulation has an important part to play in economic recovery, supporting business and protecting communities. Officers aim to help businesses by making it easier for them to follow the rules and explore ways of cutting the cost of following the rules.

The LBRO operates the national Primary Authority Scheme, providing multi-site businesses with one point of contact for consistent regulatory advice and support. The Council has adopted the primary authority scheme wherever possible and takes steps to liaise with the primary authority for local business when appropriate. The Council does not currently act as primary authority for any multiple, national business. No such business has its head office in the Stroud District at the present time. The Council assumes the role of "originating authority" for a number of large manufacturers and always responds to reasonable requests for information from other food authorities. Officers would be able to make the necessary resources available to act as primary authority should the need arise.

3.4 Advice to Business

The Council recognises that it has an important role to play in giving advice to small businesses and in helping them understand their legal obligations. Every new business that registers with the authority is offered a free advisory visit before they start trading. Appropriate advice is given at every inspection and during every investigation. Officers will always respond to requests for advice but will not carry out monitoring, training or the preparation of documented procedures on behalf of businesses. In 2014/15 the team responded to 109 requests for advice, mainly from people intending to open new food businesses.

Food Business Operators are required to put in place management procedures to control food safety that are based on Hazard Analysis Critical Control Point (HACCP) principles. The Regulation requires appropriate food safety management arrangements rather than HACCP systems. The Food Standards Agency has used the flexibility in the Regulation to develop a toolkit for caterers and retailers known as 'Safer food, better business' (SFBB). The Food Safety team will continue to support

SME's in the implementation of this requirement and to take enforcement action if it is necessary to ensure food safety.

The SFBB management tool can be freely downloaded by local businesses and are promoted during inspection. The SFBB pack is offered to every new caterer and retailer in the District and, where proprietors are willing, officers will demonstrate the use of the pack.

The Commercial Services Unit undertakes to carry out at least 6 CIEH Foundation Food Hygiene courses for local food handlers during the year. The Section is also involved in arranging other training and promotional activities, including assisting local school teachers in delivering food hygiene messages to children. See Section 3.9.

[Ref. Commercial Services Unit Procedure Note 2.1 Food Hygiene Inspections]

3.5 Food Sampling and Inspection

The Council is committed to participation in national and local food sampling programmes and works closely with the other District Council's and the Health Protection Agency in this respect. Officers also carry out routine sampling of locally produced, high-risk foods particularly if businesses do not have robust monitoring systems in place.

Last year a total of 86 samples of food were taken from premises in the District, of which 26 were found to be unsatisfactory or unacceptable. Unsatisfactory samples are followed up either by further sampling and/or investigation into possible failures of control.

Samples were also taken by the Environmental Protection Unit from private water supplies serving food businesses. Samples are routinely taken from over 200 private water supplies serving both domestic and commercial premises in the District and food safety officers are notified if problems are found in food establishments.

In 2015/16 officers expect to fully participate in any national sampling initiatives. In addition officers will carry out spot checks on imported foods as part of a national initiative to improve imported food controls throughout the distribution chain. Officers also regularly take samples of high-risk foods from local outlets – priority is given to premises producing or preparing high-risk foods where there is the potential for survival of pathogens (i.e. lack of a kill step in the manufacture of raw or unpasteurised products) or opportunities for cross-contamination of product after preparation. Representative samples are to be taken from the premises in consultation with the PHE Laboratory Service.

In certain circumstances food complaints received by the Council are sent for analysis or examination. The Council has made arrangements with Worcestershire Scientific Services, to act as analyst and the Health Protection Agency Laboratory, Birmingham to carry out microbiological examination of foods. Most complaints can be dealt with by drawing on the experience and expertise of officers within the Section.

Procedures have been drawn up for taking formal samples in accordance with FSA Code of Practice, to ensure that samples are representative and that the results will stand up to legal scrutiny.

The Health Protection Agency provides funding to local authorities to cover the laboratory costs for a limited number of samples. Adequate resources are available in the budget for 2015/16 to cover the anticipated cost of food analysis and examination.

[Ref: Commercial Services Unit Procedure Note 2.7 "Sampling Procedure"].

3.6 Outbreak Control and Infectious Disease Control

The Section receives notifications of notifiable diseases and also deals with allegations of food poisoning from alleged victims. Most cases, or suspected cases, of food borne infectious disease are investigated and appropriate advice is given (cases of campylobacter infections are not usually investigated as it has a long incubation period and can be contracted from sources other than food). Last year the Section received 193 notifications of actual or suspected food borne infections (compared to 159 in 2013/14). Members of the public may also contact officers with their own "diagnosis" of food poisoning symptoms; 1 report was investigated last year. There were no reported outbreaks of gastrointestinal disease associated with premises in the District.

The Commercial Services Manager also meets with Public Health England infection control staff approximately twice a year. Meetings are chaired by the Consultant in Communicable Disease Control [CCDC]. The Committee has drawn up a County wide "Outbreak Control Plan" and a memorandum of understanding for the investigation of single cases of infectious disease.

[Ref. Commercial Services Unit Procedure Note 2.5 "Food Poisoning Outbreak Control" and 2.6 "Exclusion of Food Handlers Suffering from Food Poisoning"].

The Section also receives notifications from the Animal Health and Veterinary Laboratories Agency concerning tuberculosis infection of cattle in dairy herds. Steps are taken to ensure that all milk from herds which have lost their "TB free" status is heat treated before it can be used for human consumption. Farmers are also given advice on controlling human infection. The Stroud District has one of the highest incidences of TB in cattle in the UK. 93 cases were reported to the Commercial Services Unit in 2014/15.

[Ref. Commercial Services Unit Procedure Note 2.18 "Controlling the Sale of Milk from Dairy Herds Which Have Lost Official Tuberculosis Free Status"]

3.7 Food Safety Incidents

The Food Section has a system in place to receive and action all food alerts issued by the Food Standards Agency. The FSA issues a 'Product Withdrawal Information Notice' or a 'Product Recall Information Notice' to let local authorities and consumers know about problems associated with food. In some cases, a 'Food Alert for Action' is issued. This provides local authorities with details of specific action to be taken on behalf of consumers.

A Product Withdrawal Information Notice or a Product Recall Information Notice is issued where a solution to the problem has been put in place – the product has been, or is being, withdrawn from sale or recalled from consumers, for example. A Food Alert for Action is issued where intervention by enforcement authorities is required. These notices and alerts are often issued in conjunction with a product withdrawal or recall by a manufacturer, retailer or distributor.

A senior officer considers the implications of food alerts immediately. If necessary, resources will be diverted from other functions to ensure that serious emergencies are properly dealt with. 36 alerts were issued in 2014/15, the majority of these were for information only. Gloucestershire Trading Standards department is the lead authority for chemical contamination incidents, nevertheless, food safety officers do work with colleagues in the County Council during major product recalls.

[Ref. Commercial Services Unit Procedure Note 2.10 "Food Incidents and Hazards"]

These procedures also deal with the notification of "serious localised incidents and incidents representing a wider problem" to the Food Standards Agency in accordance with the Food Law Code of Practice. No incidents were reported to the FSA by Stroud District Council officers in 2014/15.

3.8 Liaison with Other Organisations

Officers in the Commercial Services Unit place great emphasis on ensuring that actions are consistent with other local authorities.

- The Gloucestershire Food Safety Group

meets approximately 4 times each year and is attended by representatives of the 6 District Councils in the County, Gloucestershire County Council Trading Standards Service; Health Protection Agency's Laboratory Service and the Gloucestershire Food Vision project. The Group carried out an inter-authority audit of food safety services in 2010/11 in accordance with guidance issued by the FSA.

- Health and Wellbeing Group

The Head of Environmental Health participates in the Health and Wellbeing Group which is a joint working group concerned with the delivery of the Health Improvement Programme within the District.

- Stroud District Council Services

The Commercial Services Unit has arrangements with the Council's Development Control Division to review all relevant planning and building regulation applications relating to food businesses.

3.9 Food Safety Promotion and "Food Hygiene Rating Scheme".

The Council offers the Chartered Institute of Environmental Health's Foundation Food Hygiene course. 8 courses were run last year, training around 80 food handlers. The Section also promotes courses run by other, local food hygiene training providers. Officers will also deliver food hygiene courses on request to specific businesses. A reasonable fee is charged for these courses.

Officers will give free talks on food hygiene to local primary and secondary school children and other interest groups on request. In 2014/15 3 presentations of this type were made.

The FSA offers a free management tool called Safer Food better Business to caterers and retailers to make it easy to comply with a legal requirement to put in place a documented food safety management system. 2006/07 the Gloucestershire Food Safety Group were awarded a grant of £305K to deliver training for businesses to help them implement SFBB. Established businesses are now quite familiar with this management system but officers continue to offer free advice and assistance during their inspections.

In 2011 all 6 Gloucestershire Local Authorities adopted the national Food Hygiene Rating Scheme which is run by the Food Standards Agency and has been adopted by almost all local authorities in England Wales and Northern Ireland. The Gloucestershire Authorities obtained a grant from the FSA to cover implementation costs. In 2014/15 officers received funding from the FSA to encourage businesses to display their food hygiene rating window sticker.

The Food Hygiene Rating Scheme replaced the “Scores on the Doors” scheme which had been running for 4 years. Food hygiene rating schemes introduce a real incentive for food business operators to maintain high standards between inspections. Since their introduction there has been a significant decline in the number of low scoring premises and an increase in the number of high scoring premises. As the risk rating scores also determine the frequency of inspection of food premises food hygiene rating schemes contribute to a reduction in the number of premises inspections required each year.

Table 6: Comparison of Food Hygiene Ratings in 2012 and 2015.

FHRS Rating	March 2012	% dist'n 2012	March 2015	% dist'n 2015
5 - Very Good	362	52.5	516	64.1
4 - Good	177	25.7	173	21.5
3 - Generally Satisfactory	98	14.2	85	10.6
2 - Improvement Required	19	2.8	10	1.2
1 - Major Improvement Required	32	4.6	20	2.5
0 - Urgent Improvement Required	2	0.0	1	0.1
Total rated establishments	690	100.0	805	100
Establishments with rating of 3 or better	637	92.3	774	96.1

4.0 Port Health

The Commercial Services team are responsible for carrying out the Council's Port Health functions at Sharpness Docks. This includes the inspection of ships and the issue of Ship Sanitation Certificates (22 ship inspections were carried out in 2014/15, which was well below average due to one officer being on long term sick leave) as well as general public health and environmental health checks (such as rabies control and monitoring the quality of drinking water provided at the port). The port is not a border inspection post for imported food purposes and very little food from third countries is imported through the docks but officers occasionally monitor shipments of organic animal feed.

4. Resources

4.1 Staffing Allocation.

The responsibilities of front line staff were identified in Section 2.2 above. The Service operates a time recording system whereby officers allocate the time spent on different activities on a weekly basis. The full time equivalent figures in column 3 below are an estimate pending full analysis of those records.

The Council operates an annual performance appraisal system and staff development review. Training needs are identified at the time of the appraisal and column 4 of the table below indicates the training requirements relevant to the food safety service. It is recognised that the availability of training opportunities in some subjects is very limited and the Gloucestershire Food Safety Group intends to try to facilitate local courses.

Table 6: Staffing Allocation and Staff Development Plan

Officer Designation	Qualification/Competency	Full Time Equivalents	Staff Development
Commercial Services Man'	Degree in Environmental Health. EHRB registered.	0.25	Up date training.
PEHO	Degree in Environmental Health. EHRB registered.	0.50	Up date training.
PEHO (part time)	Degree in Environmental Health. EHRB registered.	0.25	Up date training.
Food and Safety Officer	Degree in Environmental Health.	0.25	Up date training.
Food and Safety Officer	Degree in Environmental Health. EHRB registered	0.50	Up date training.
Administrative Staff (3)	No enforcement responsibility	0.50	None
Total Staff (8)		Total (2.75)	

5. Quality Assessment

5.1 Quality Assessment

The Council achieved the healthy Workplace Standard in 2010 but does not currently participate in any other externally accredited quality assessment schemes. However, the Food Safety Service was audited by the Food Standards Agency in June 2001 and the Best Value Inspectorate audited the Environmental Health Service in Sept 2003. The food safety unit was subject to a detailed internal audit in 2010 and 2014 and participated in an inter-authority audit under the aegis of the Gloucestershire Food Safety Group in 2011.

[Ref. Commercial Services Unit Procedure Note No 4.4 "Quality Assurance in the Commercial Services Unit"].

6. Review

6.1 Review Against the Service Delivery Plan

Review against the Service Delivery Plan is carried out half way through the financial year in October/November and again at the end of the year in April. Only one local performance indicator is currently relevant to the food safety service.

LPIEH5 - Food establishments in the area broadly compliant with Food Hygiene Law

The target for the percentage of premises which were found to be broadly compliant at the time of inspection was increased last year from 90% to 95%. In April 2015 91.4% of premises were broadly compliant, close to the new target of 95%.

6.2 Areas for Improvement

In 2015/16 the Commercial Services Unit will continue to influence businesses in an effort to increase the percentage of premises that are broadly compliant.

- The Commercial Services Unit will continue to focus on the inspection of high and medium risk food premises in accordance with the local Food law Code of Practice. Officers will place emphasis on the importance of training and the identification and control of food safety hazards.
- In relevant premises officers will continue to have regard to new FSA guidance on E.coli O157 and the control of cross-contamination.
- Officers will spend additional time with very low scoring food caterers (i.e. rated 0 or 1) to assist them in becoming broadly compliant with food safety requirements.
- Officers will participate fully in local and national food sampling programmes.
- Actively promote the Food Hygiene Rating Scheme to businesses and consumers in the local media.

Philip Park: Commercial Services Manager _____

Jon Beckett: Head of Environmental Health _____