

OVERVIEW:

In order to meet the requirements of the Framework Agreement on Local Authority Food Law Enforcement, West Lothian Council is required to develop and approve an annual food service plan. The structure of the food service plan is determined by the guidance contained within the framework agreement.

The plan outlines how food safety and animal feedingstuffs will be monitored and controlled. Food safety is the responsibility of environmental health. Animal feedingstuffs and hygiene in primary production are the responsibility of trading standards.

The service plan covers seven sections:

- food team aims and objectives;
- authority background;
- service delivery;
- resources;
- quality assessment;
- service plan and operational plan review; and
- animal feedingstuffs and hygiene at primary production.

The majority of the service plan relates to the work covered by the food team within environmental health. Section 7 covers the specific work undertaken by trading standards.



SECTION 1 ~ FOOD TEAM AIMS AND OBJECTIVES

1.1 Mission Statement

To protect public health and contribute to a healthy community in West Lothian by ensuring the safety, wholesomeness and quality of food and water through education and enforcement.

1.2 Corporate link & Single Outcome Agreement

Improving the health and wellbeing of our communities (Corporate Plan 2007 – 2011).
We live longer, healthier lives (Single Outcome Agreement)

1.3 Aims and Objectives

Our priority partners for the work we undertake are the public and businesses within West Lothian. We also support the following objectives of the Food Standards Agency as outlined in their Strategic Plan 2005 – 2010: Putting Consumers First; namely:

1. To continue to reduce foodborne illness.
2. To reduce further the risks from chemical contamination of food.
3. To enable consumers to make informed choices.

The objectives of the food team are as follows:

1. *To ensure the safety of food by means of a programme of inspections designed to check compliance with current laws and codes of practice, and to educate, train and motivate all parts of the food industry. To enforce the law when necessary in the interests of public health.*
2. *To protect the public and ensure the quality and safety of food and drink in West Lothian by inspection and sampling for analysis and examination. To inspect premises to ensure food standards legislation is being applied and improve compliance through a balance of education and enforcement.*
3. *To react to emergencies and immediate threats to public health. To investigate food related enquiries and complaints. Reacting to food safety alerts issued by FSA and other bodies to secure the withdrawal of any suspect foods from premises within West Lothian. To ensure that food not meeting food safety requirements is removed from sale to the public. To issue appropriate export certification in relation to food being exported to countries out with the EU.*
4. *To provide guidance and raise awareness of food safety within the business community and general population of West Lothian to ensure compliance with food law and help develop a better educated population.*
5. *To work together with colleagues in West Lothian Council, other local authorities, professional bodies, central government and other interested parties to ensure a co – ordinated approach to food related matters. To provide relevant reports and statistics as required regarding the operation of the food service.*
6. *To ensure the wholesomeness, safety and quality of drinking and pool waters in West Lothian.*
7. *To be proactive and reactive in controlling and investigating instances of food or water – borne diseases and infections within West Lothian. To provide appropriate information to patients and work with partners in public health medicine to control the further spread of infection.*
8. *To ensure activities which are necessary to support, complement and develop the work of the food service are carried out.*



1.4 Our priorities

FIRST – Emergencies, threats to public health and other essential reactive and proactive work, e.g. infectious disease investigations, outbreaks, food alerts for action, high priority complaints, revisits and follow up formal action to protect public health etc.

SECOND – Carry out planned inspections to ensure compliance with the law. Priority is to be given to Category A, B, and approved premises for hygiene inspections. Advise new, potentially high risk, businesses to ensure compliance and minimise the need for future enforcement action.

THIRD – Carry out planned inspections of high risk category C and unrated premises for food hygiene, and category A premises for food standards.

FOURTH - All other work, e.g. projects, enquiries, lower risk inspections for hygiene and standards, lower priority complaints etc.

These priorities have been established to ensure, with the resources available, we address food safety and public health needs in all aspects of our work. The priorities have been changed for the first time in many years to reflect the changing demands on the service.

SECTION 2 ~ AUTHORITY BACKGROUND

2.1 Profile

West Lothian is a mixed rural and urban authority covering a geographical area of 42,504 Ha. The population is approximately 169,510. The Environmental Health service is located in County Buildings, Linlithgow. There are approximately 1389 food premises within the area ranging from farms, retailers and caterers, to large manufacturers.

2.2 Organisational Structure

The service structure is as per appendix 1.

The food team is part of the Environmental Health & Trading Standards service which is part of Development and Regulatory Services .

The authority has appointed the City of Edinburgh Council to provide analytical and food examination services.

The Trading Standards team, located in Bathgate, undertakes animal feedingstuffs enforcement. The team will also undertake hygiene inspections of primary producers as part of a Food Standards Agency funded inspection programme.

2.3 Scope of the Food Service

The scope of the food service and feedingstuffs enforcement is set out in appendix 2.



2.4 Demands on the Service

The food team services are available from 8.30am to 5.00pm Monday to Thursday and 8.30am to 4.00pm Friday. The team, however, has to accommodate working outwith these times due to operating times of businesses. Evening, early morning, and weekend working is necessary to carry out the inspection and sampling programmes. A 24-hour emergency out of hours service is available for food alerts for action.

There are three approved premises in terms Regulation (EC) 853/2004. We anticipate approving two further premises in 2010. A number of premises currently meet the exemption criteria for approval but may well require to be approved in the future. There is a regular turnover in many of the catering businesses with new owners and changes in operation of the business. There are an increasing number of ethnic language food workers which requires the assistance of Interpretation and Translation Services during visits to premises.

In line with the enforcement policy, officers are required, when necessary, to take appropriate enforcement action. This may include service of notices, closure of premises, and reports to the Procurator Fiscal leading to prosecutions and time in court. The level of action required has been increasing in recent years. This places a strain on the service. Appendix 9 contains a case study on the impact of enforcement on the service.

The principles of better regulation have been a key aspect of how the food service is delivered for a number of years. As well as food hygiene and food standards, officers in the food team will also carry out a number of workplace safety and smoking enforcement inspections. This is done to ensure best use of resources and avoid unnecessary additional visits to premises. It is encouraging to note the positive feedback from business consultation exercises in relation to their experience of inspections and enforcement activities.

It is however vitally important to remember that the purpose of the food service in West Lothian is public health protection. In 2010 a number of changes are being made to the approach taken to inspections. It will ensure that attention continues to be given to premises presenting a risk to public health and that outcomes and follow up action are better recorded. Some of these issues are highlighted in 6.3.

The food service (food safety) costs per head of population have not risen in recent years even though West Lothian's population continues to increase. Most recent government figures (2008)¹ estimate that the UK public spend £36.83 per person per week on food and drink. The inspecting, sampling, monitoring, enforcing and all other services provided by this service cost the West Lothian population £0.06 per person per week.

2.5 Enforcement Policy

In terms of the framework agreement on food law enforcement there is a written enforcement policy, which has undergone an equality impact assessment, is approved by the Council and is followed by officers. A copy of this policy is available to any business on request.

¹Family food 2008 – A national statistics publication by DEFRA.



Alternative enforcement arrangements are allowed within the code of practice for certain risk rated food hygiene and food standards inspections. It is the policy of this service to visit all premises within these risk ratings. All visits are carried out in accordance with internal procedures.

SECTION 3 ~ SERVICE DELIVERY

All officers in the food team will contribute to the development and implementation of this plan. In line with the framework agreement on food law enforcement the following work areas of the team plan have been highlighted. Framework policies and procedures relating to animal feeding stuffs inspections, sampling etc. are implemented and monitored by colleagues in trading standards. These matters are discussed in section 7.

3.1 Food Premises

There are currently 1389 food premises within West Lothian which require to be inspected by the team. Inspections will be carried out for food hygiene and food standards (composition, labelling etc.). Inspection frequencies are determined by the nature of the business and performance against specific criteria set out in the food law code of practice.



To ensure that food standards inspections are properly targeted they are linked, where possible, to the food hygiene inspections due and are set as an internal performance indicator.



Food premises profiles, inspection targets and revisit information is outlined in Appendix 3.

The approach to premises inspections has been reviewed and new procedures have been introduced. The purpose is to ensure better recording of activities following inspection and also ensure that significant failures are followed up appropriately. It allows officers to target problem premises. An overview of the "Food Safety Interventions Policy" can be found in appendix 7.

3.2 Food Complaints

The food team receives a number of complaints about unsatisfactory food or food premises. These are investigated in line with our procedures on dealing with complaints.

Investigating food complaints can be quite involved and often requires working with colleagues in other local authorities. This, along with the time taken to receive reports from the public analyst etc., can increase the time taken to resolve the complaint. Complaints about food very rarely result in formal action, mainly due to the lack of evidence which could



be relied on in court. However, they do help identify failings in food processing and handling which require to be rectified to prevent further problems occurring in the future.

3.3 Home Authority Principle

This authority has not made formal home authority arrangements with any businesses for food hygiene or food standards. However, advice is given on such issues when requested. The authority submits details to the LACORS web site in relation to businesses where West Lothian is the originating authority for any complaints or enquiries. In light of the implications of involvement in home authority arrangements, it will only be done if requested and resources allow.

A number of developments regarding Principal Authority Partnerships in England are being watched with interest. Many national companies operate throughout the UK and this is intended to help ease the burden on them. Whilst there is no remit for such partnerships in Scotland, it is expected that where they do apply no enforcement action is taken without first consulting the principal local authority for the company. That authority will also work to set inspection programmes for these businesses which other local authorities are expected to adhere to. It would be fair to say there are a number of concerns regarding this approach and whilst this service works hard to ensure good relations with all businesses, it is concerned that this approach may benefit businesses more than public health.

3.4 Advice to Business

Although all officers will be involved in giving advice to businesses, one officer has been given the remit to deal with all new business enquiries. This role involves identifying new businesses through planning applications, building warrants, licensing applications, care commission requests and direct enquiries to the service. The officer will give advice on food safety and workplace safety issues. This is an essential aspect of work as it helps to ensure that businesses which request help can be set up complying with the necessary legal requirements. It has been established as one of our high priorities for higher risk food establishments.

The ongoing work with established businesses is assisted by a number of helpful information sheets, guidance booklets, and other educational resources. Much of the information used is produced within the team and aims to give businesses the necessary information for complying with the law and improving hygiene and safety standards. We aim to include all new premises in our inspection programme within three to six months of registering, dependant on nature of the business. Appendix 3 shows a comparison of enquiries received over recent years.



3.5 Sampling – Food and Drink

The team develops an annual sampling plan. Sampling is done to help monitor the quality and safety of food and drink being produced and sold within West Lothian. Sampling of food prior to a hygiene inspection is a useful indicator of how the business is operating.

The range of samples taken is split into chemical and microbiological. The current target for chemical samples is 1.63 samples per 1000 population and for microbiological the target is 1.69 samples per 1000 population. This is a significant drop in targets from previous years.

For 2008/2009 the sampling target for chemical analysis was reduced by 20% (410 to 328) in order to contribute to the financial savings required in council budgets. This was a reduction of 82 samples on previous years. For 2010/2011 the targets have been reduced even further for chemical (328 to 280, 14.6%), and microbiological (328 to 290, 11.6%).

Appendix 3 has details of samples taken. The sampling plan for 2010/2011 is found in appendix 8.



Case Study 1

In September 2009 the team were notified by the Food Standards Agency of a meat supply business which had been set up and was operating without approval. The approval was the responsibility of the Meat Hygiene Service (MHS). However, the current regulations do not give MHS any power to stop such activity and it meant the council were left with having to take legal action against the business.

This involved officers serving a remedial action notice to prohibit the operation of the business until it had received approval from the Meat Hygiene Service. This is the first such notice served in West Lothian.

Although this incident highlighted a number of concerns, i.e. businesses setting up without notification or approval, poor communication by MHS with our team, poor control within regulations requiring local authorities to enforce legislation in such premises, it also highlighted the positive and responsive approach of this service and its officers to protecting public health.

3.5.1 Sampling – Water Quality

Sampling of drinking and recreational water is also undertaken. This involves sampling mains and private water, as well as swimming pools, spa pools etc. The private water regulations place a requirement upon local authorities, and those responsible for private

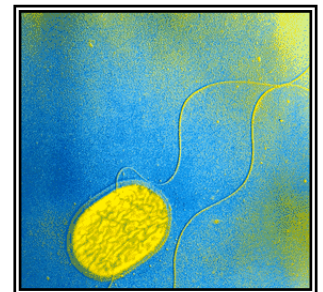


supplies, to ensure drinking water standards meet those of public water. The team has been involved in sampling and monitoring local private supplies and undertaking risk assessments on them. Sampling will be required on an ongoing annual basis which has increased the amount of work previously undertaken by the team. An annual return on sampling, enforcement and water quality standards is made to the Scottish Government.

In 2010 it is our intention to stop taking samples of mains water and direct complainants to Scottish Water and the Drinking Water Quality Regulator. This is necessary to accommodate other workload priorities and budget reductions.

3.6 Control and Investigation of Outbreaks of Food Related Infectious Disease

Controlling and preventing the further spread of infectious disease is a key part of the service provided by the food team. This work is done in partnership with Lothian NHS and the Consultant in Public Health Medicine. Notifications of food poisonings and infectious diseases such as, *salmonella*, *campylobacter*, *cryptosporidium*, *E. coli O157* etc., are passed to the team by Lothian NHS. The role of the service is to investigate all cases looking for possible sources, or outbreaks, and in doing so take preventative measures to stop the further spread of infection. Recent statistics are shown in appendix 3.



A major outbreak plan has been developed by Lothian NHS and the local authorities of West Lothian, Edinburgh, Midlothian and East Lothian. Procedures for dealing with sporadic cases are also in place. As part of the review of sporadic procedures it has been agreed that cases of campylobacter will no longer be investigated by this service. Notified cases will be sent guidance and information about the illness by Lothian NHS, Health Protection Team. Statistics will be reported to the team monthly by Lothian NHS. Case numbers will be reviewed regularly and any issues will be discussed between Lothian NHS and the local authorities.

Case Study 2

The team has always tried to ensure that it responds to issues happening nationally and relate this back to the work done within West Lothian. During 2009 two major public health issues caused officers to put in place a local response. The first of these was the publication of the inquiry report into the 2005 E coli outbreak in Wales. This raised a number of significant issues for the team but also for other council services. Officers responded by ensuring council services providing food were properly briefed on the findings, and they have also started working with social policy to help them develop a robust food safety policy for their service. The team have also reviewed the approach to inspections and enforcement to ensure they are best placed to make the right decisions for public health protection.

The second incident followed an outbreak of E coli at Godstone Farm in England. The opportunity was taken to contact all similar establishments locally to remind them of the guidance on controlling E coli and offering them further advice and assistance. Officers also updated the council's education service and provided them with guidance aimed at school trips to such places.



3.7 Food Emergencies and Safety Incidents

Food safety emergencies and incidents which pose a serious risk to public safety are identified as a priority issue for the food team. Procedures are in place to ensure that warnings issued by the Food Standards Agency, and local incidents which need to be reported to the FSA, are dealt with properly.

Most alerts are for information only but a number of press releases and trade notifications had to be completed by the team in relation to the warnings. As well as food alerts, the FSA has a system for notifying local authorities of allergy alerts. These were previously part of the main alert scheme. The main reasons for such alerts is the failure to declare the presence of one of the many allergens now listed in the food labelling regulations.

The team has ensured that the out of hours emergency service has procedures to follow should food alerts for action be received out with normal working hours.

3.8 Liaison with Other Organisations

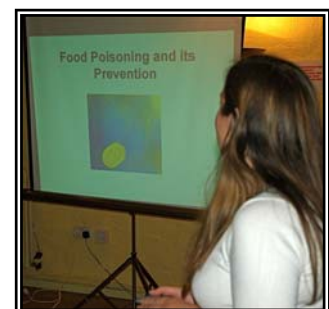
It is important to realise that the food team does not work in isolation from other internal services or external organisations. Internally the team works with planning, building standards, licensing, legal, education, occupational health, corporate communications, social policy, community health care partnership etc. to provide a joined up service.

Externally the team works with other local authorities, through Lothian and Borders Food Liaison Group, and Scottish Food Enforcement Liaison Committee's Food Safety sub-group and Food Standards sub-group. The team maintains links with Lothian NHS and Scottish Water through the EHO / HPT group. A good working relationship has been developed with the Procurator Fiscal service. The service works with the Care Commission in the registration of care facilities. It is audited by the Food Standards Agency.

Appendix 4 lists the team's main customers, partners and stakeholders.

3.9 Food Safety and Standards Promotion

It is clear that inspection of premises and enforcement of the law will not in itself bring about the necessary improvements in public health. There needs to be a balance of education with enforcement. The team's input to education and promotion of food safety and standards is limited by available resources even although it is recognised as an important tool in public health protection.



We are a registered training centre for the REHIS elementary food hygiene certificate, and our officers have assisted other training providers in the delivery of their courses. We have also tailored training to the specific needs of different groups as required. Our involvement in training is always balanced against other workload commitments.



We will continue to work with our colleagues in the Community Health Care Partnership to assist catering establishments introduce healthier options onto their menus.

There are five businesses in West Lothian holding the Eatsafe award for hygiene standards. We hope more businesses will be able to meet these requirements in coming years.

Our food hygiene DVD "Food Safety is Everybody's Business" continues to be used with catering businesses to help them train staff. It is currently available in English, Polish, Italian, Urdu, Punjabi and Cantonese.



Case Study 3

The team has always had a supportive role in training and developing other professionals in the work we do. In October 2009 we were able to support a visit by two representatives from the Malaysian Ministry of Health. They were on a visit to the UK to find out more about our approach to food safety – in particular food hygiene inspections and incident management. One of the representatives was responsible for reviewing hospital hygiene in Malaysia. Thanks to the kind support of staff at St John's Hospital we were able to spend the afternoon in the kitchens discussing inspections and food safety management in these settings. It was a good opportunity to impart our knowledge and experience which in turn will hopefully help develop better working practices and food safety standards in other parts of the world.

SECTION 4 ~ RESOURCES

4.1 Financial Allocation

The annual budget for period 2009/2010 for the food services was:-

	Budget
Staff	£ 409, 101
Travel and Subsistence	£ 22,150
Equipment	£ 1,000
Sampling	£ 59,453
Total	£ 491, 704

The annual budget for period 2010/2011 for the food service is:

	Budget
Staff	*
Travel and Subsistence	*
Equipment	*
Sampling	£53,661
Total	

At time of writing final budget not



4.2 Staffing

The service is staffed as per the structure indicated in appendix 1.

Food safety is only one element of the role of environmental health. The pressures on the whole service increase year on year with changes in legislation, increasing population and demand on the service having to be managed on a priority basis. We are therefore addressing the staff resources issues in food safety by ensuring we target priority areas of work, and continuing to work as effectively as possible to protect public health.

4.3 Staff Development Plan

The Food Law Code of Practice (Scotland) requires a minimum of 10 hours food safety training to be completed by every officer annually. Officers who are members of the Royal Environmental Health Institute of Scotland are also required to complete 20 hours training and development every year as part of the Continuous Professional Development scheme. Four officers within the food team have achieved chartered status.

The development of officers, as well as being a legal requirement, is an essential component of providing a quality service to West Lothian. The 10 hours training requirement for officers involved in food safety work was met. Training and development needs however have to be prioritised service wide and opportunities for training are sometimes limited. Training requirements are currently being met thanks to the low cost training programme provided by the Food Standards Agency.

Staff development has also been assisted through accompanied visits, peer review visits, involvement in working groups, special projects etc. It is hoped to continue this type of development activity in 2010/2011.

Training and development needs are assessed during individual Performance Review and Personal Development Planning meetings held twice a year.

SECTION 5 ~ QUALITY ASSESSMENT

5.1 Quality Assessment

The Environmental Health & Trading Standards service is participating in the West Lothian Assessment Model. This is West Lothian Council's adaptation of the European Foundation for Quality Management. This is being used to help deliver continuous improvement of the service in years to come. The service first obtained Chartermark during 2006/2007 and during 2008/2009 retained the award. It has subsequently achieved the new Customer Service Excellence award during 2009/2010, and we will be subject to re – application in 2010/2011.



The food safety and animal feeding stuffs work is subject to audit by the Food Standards Agency Scotland. A last core audit was undertaken in August 2005. This was followed up in



August 2006. There were no action points identified as outstanding for the service. Previous audit reports are available on www.food.gov.uk. Our next planned audit is expected in May 2010.

Internal monitoring of procedures and customer feedback regarding hygiene inspections and food complaints is also used to assess the quality of the service provided. Customer consultation is a key development issue and a customer and business consultation survey is carried out once a year. At the conclusion of all food complaints customers receive a questionnaire which can be returned to allow further action to be taken where concerns are expressed.

SECTION 6 ~ SERVICE PLAN AND OPERATIONAL PLAN REVIEW

6.1 Review against Service Plans and Team Plans.

The work and commitments of the food team are determined in consultation with officers and team members.

The food service plan will be reviewed in six months.

6.2 Identification of any Variance from the Service Plan

There have been some changes in staffing and workload allocation during 2009/2010. The team has struggled with the volume of work, and staff levels have been affected by vacant posts, maternity and other leave, temporary appointments, inability to attract suitably qualified staff, and use of contractors.

A high number of inspections have been missed and will now be added to the inspection plan for this year. Due to the nature and skills of the temporary staff we were able to recruit it meant that they could only contribute to lower risk inspections. This means that a large percentage of missed inspections were in our medium risk categories. Also a large number of lowest risk premises were inspected using alternative enforcement strategies. This makes numbers look better but is actually misleading in terms of the content of such inspections. Those officers able to focus on higher risk work became involved in a high level of formal and informal enforcement. There was a large increase in the number of premises requiring to be closed and requiring other types of formal notice. Numbers of revisits per officer also increased. A case study has been written up of the time involved in taking enforcement action within three premises. This is found in appendix 9. It aims to demonstrate the resource impact of dealing with problem premises.

It is important to understand that public health protection through food safety is not just about how much we do but how well we do it. This level of enforcement is necessary for the protection of public health.

2008/2009 was the last time that food hygiene inspections were reported as statutory performance indicators. External reporting of inspection targets continues with the Food Standards Agency. However, to ensure that the service remained focused on risk based inspections the target dates for inspections were amended. Performance targets are subject



to corporate and political scrutiny. Key performance indicators are reported monthly and entered onto the council's performance management system, Covalent. A number of these are also publically available through the council website.

For the fourth year in a row the number of enquiries recorded has fallen. It is however recognised that the service has still to identify a means of recording routine enquiries which are not logged on the computer system. These include enquiries from businesses and public for advice etc. which consume time and require action but the details of which do not justify the time it would take to put on the computer. The response time target for service requests and complaints is 2 days. The performance has dropped from 93% to 83%. This is a performance measure which is monitored monthly. There has been a clear impact on this from staff resources available. Completion times have however shown no real change since last year, with 53% of service requests closed within 1 week and 78% closed within a month. However, the number of service requests received was down 14% from the previous year.

There was a very minor increase in infectious disease notifications from last year.

Other positive aspects of team work addressed during 2009/2010 include:

- One new Eatsafe award made to a local food establishment.
- A further increase in the number of Healthy Living Award applications and awards granted to businesses in West Lothian.
- Support and advice on control of E coli O157 to local establishments following Godstone Farm outbreak in England.
- Briefing and guidance issued to council catering services following publication of Welsh E coli outbreak inquiry report. Team are now working with social policy staff to develop a food safety policy document for the service.
- Letter and briefing for all swimming pool operators on controlling cryptosporidium and advising them of new guidance issued by Pool Water Treatment Advisory Group.
- Food hygiene training courses provided for "Get Cooking" initiative volunteers.
- Review and update of enforcement policy. Development of service wide policy for Environmental Health & Trading Standards.
- Involvement in incident management of raised levels of cryptosporidium at Marchbank treatment works.
- Supported a visit by two representatives from the Malaysian Ministry of Health.

Performance and workload comparisons are made in Appendix 3.

6.3 Areas for Improvement / Challenges.

The following have been identified as the key challenges for 2010/2011:

- Ensuring the food service is best placed to meet the challenges and issues raised following the outcomes of the Welsh E. coli inquiry report and subsequent FSA guidance.
- Food Standards Agency audit and managing the outcomes.
- Managing customer expectations for service requests and complaints in line with changes to newly introduced priorities.



- Developing new approaches to business engagement to compensate for available staff resources to allocate to routine inspections.
- Ensuring officers are supported in dealing with challenging, time consuming and high risk workload.
- Large numbers of premises not being inspected or time periods between inspections increasing significantly.
- Being able to continue to provide help and support to new and existing businesses.
- Further reductions in sampling budgets restricting the ability of the service to monitor food and water safety.

The specific projects identified for attention in 2010/2011 are included in appendix 6.

The biggest challenge for managing food safety within West Lothian relates to the ongoing pressures in local government finance and the impact this will have on resources to protect public health. The main demand on the food service currently is dealing with risks to public health balanced against an increasing workload. We have also had to reduce the food sampling budget again to meet the required council wide budget pressures. Whilst some efficiency measures and changes to work practices have helped reduce the impact of reductions in previous years, any further reductions will require the level of service to be reduced accordingly.

The plan for 2010/2011, and beyond, is to ensure the service focuses available resources at priority areas of work, and takes the correct action to protect public health when risks are identified.

SECTION 7 ~ ANIMAL FEEDING STUFFS AND PRIMARY PRODUCTION

7.1 Service Delivery

The control and monitoring of animal feeding stuffs is undertaken by Trading Standards. 0.5 FTE staff are responsible for registration, inspection and sampling activities in relation to all feedstuffs establishments within West Lothian. There are currently 118 premises that have applied for registration/approval or made a declaration of conformity.



7.2 Inspection

The inspection procedure is as detailed in the document "West Lothian Council, Development and Regulatory Services, Feeding Stuffs Inspection Procedure". Feeding stuff premises are subject to the LACORS premises risk assessment scheme and (in relation to primary production) Annex 10 of the Food Law Code of Practice, which determine the risk category and inspection frequency. Trading Standards staff plan to undertake 30 programmed visits to primary producers to carry out joint food and feed hygiene inspections as per agreement with the FSA.



7.3 Staffing

The Trading Standards section currently comprises five Trading Standards Officers, two Consumer Advisors and four Enforcement Officers. Two Trading Standards Officers and one Enforcement Officer make up the Commercial and Agriculture Team who are responsible for animal feeding stuffs enforcement.

All Trading Standards Officers and Enforcement Officers are authorised to enforce the Agriculture Act 1970 and subordinate and associated legislation, with 0.5 FTE staff specifically allocated to this function.

Appendices:

Appendix 1 – Service structure.

Appendix 2 – Scope of food service

Appendix 3 – Workload comparisons.

Appendix 4 – List of customers / partners / stakeholders

Appendix 5 – Projects and initiatives 2009/2009.

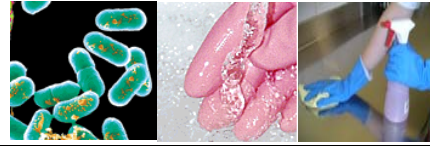
Appendix 6 – Projects and initiatives 2010/2011.

Appendix 7 – Overview of food interventions policy.

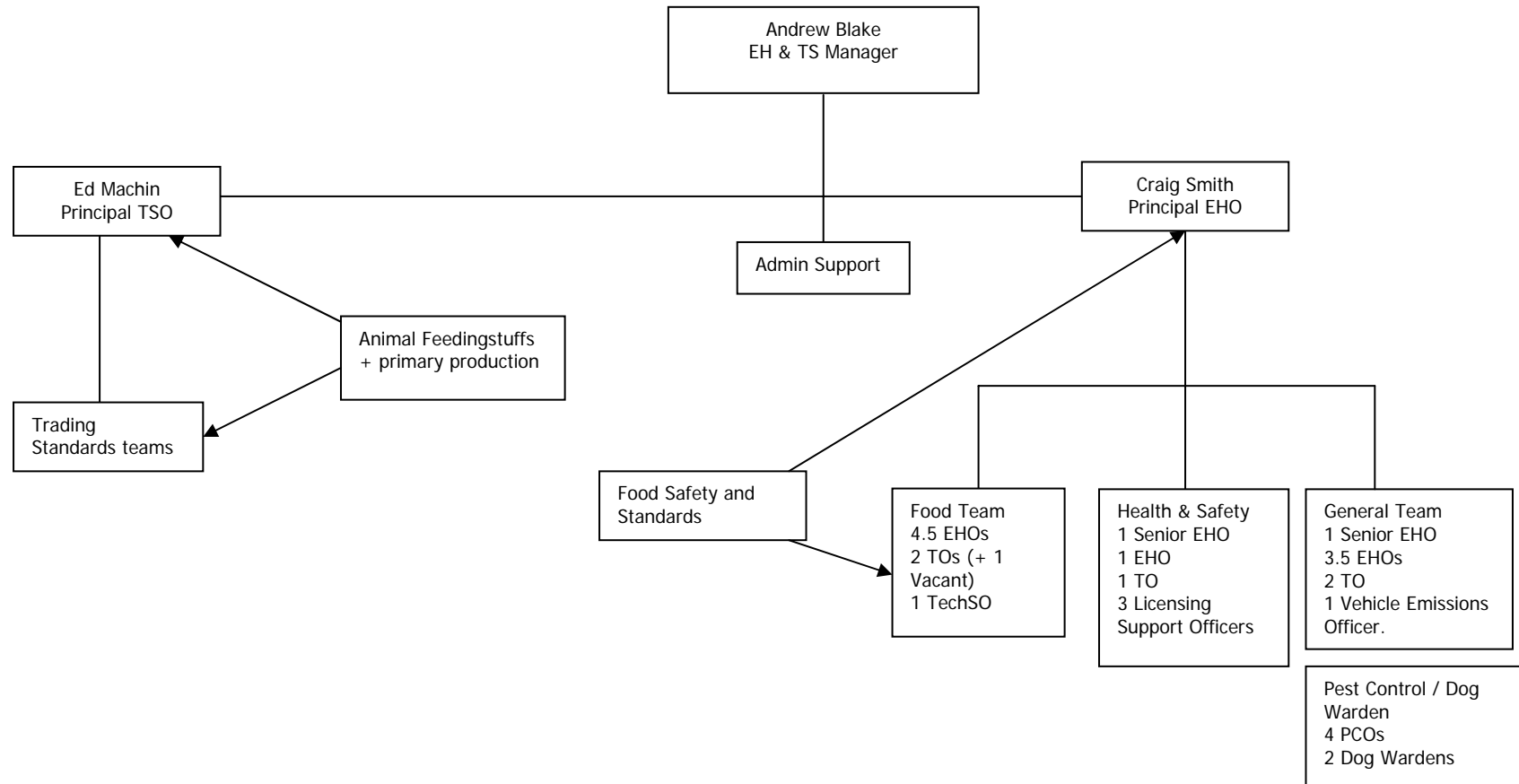
Appendix 8 – Food sampling plan 2010/2011.

Appendix 9 – Enforcement case study.

Appendix 10 – Service requests / complaints – service standards and prioritisation.



Appendix 1 – Environmental Health and Trading Standards Structure (April 2010)





Appendix 2 – Scope of Food Service

Function	Activities
Food hygiene	<ul style="list-style-type: none"> To inspect premises in line with The Food Law Code of Practice (Scotland) and prioritise the inspection of premises on a basis of high to low risk. To adhere to relevant team policies and procedures. To ensure compliance with the law by means of education, training, motivation and enforcement. To ensure that re – visits are made to premises when necessary, and in line with our inspection procedures. To ensure compliance with legal requirements in terms of licensing and approval of premises.
Food safety and standards	<ul style="list-style-type: none"> To inspect premises in line with The Food Law Code of Practice (Scotland). To adhere to relevant team policies and procedures. To ensure compliance with the law by means of education, training, motivation and enforcement. To ensure that re – visits are made to premises when necessary. To ensure that a sampling programme is devised and followed.
Food enquiries and investigations	<ul style="list-style-type: none"> To react to emergencies and immediate threats to public health. React to and investigate, where appropriate, enquiries and complaints relating to food safety and quality, and hygiene in food premises. React to and respond appropriately to food alerts. To adhere to team policies and procedures. When necessary seize, detain and arrange for condemnation of food not meeting food safety requirements. Respond to requests for verification of voluntary surrender of food for condemnation. Respond to requests for export certificates.
Business and consumer advice	<ul style="list-style-type: none"> Carry out visits to premises to give guidance or to follow up complaints. Provide guidance and advice to new businesses to help comply with food law. Provide training and education for trade and other groups in West Lothian. Deal with general enquiries for help and guidance on relevant food matters.
Reporting and liaison – working together	<ul style="list-style-type: none"> To ensure that policies and procedures are in place and followed as per the Framework Agreement on Food Law enforcement. Prepare reports and returns to various groups and agencies. Work together with others to improve food safety and the service provided. Work together as a team.
Water quality and safety	<ul style="list-style-type: none"> To ensure that a sampling plan is in place and carried out to measure the safety and quality of private and public drinking water supplies in West Lothian. To ensure that a sampling plan is in place and carried out to measure the safety and quality of recreational water, such as swimming pools, spas etc. To ensure that appropriate follow up action is taken when problems are identified with water safety and quality. To respond to requests, where appropriate, from people concerned about the safety and quality of water in West Lothian.
Infectious disease control	<ul style="list-style-type: none"> To investigate notified cases of food poisoning, and food or water – borne disease. To notify Public Health Medicine of possible outbreaks. To adhere to relevant team policies and procedures. To provide good advice to patients and public to prevent further spread of infection. To be involved in any incident or outbreak control team.
Support activities and miscellaneous	<ul style="list-style-type: none"> To manage the work of the food team. To provide technical and administrative support. To instigate special projects and initiatives to tackle particular food related issues. To use and maintain a system database to manage the inspection programme and process service requests. To maintain the competence of inspection staff and develop their skills and knowledge, by means of peer review, training and monitoring. To ensure that premises files are updated with appropriate information.
Feedingstuffs	<ul style="list-style-type: none"> To ensure the registration of feedingstuffs premises. To ensure registered premises are inspected. To ensure that feedingstuffs are sampled. To respond to complaints and concerns regarding quality and safety of feedingstuffs. To ensure compliance with all legal requirements in relation to feedingstuffs.



Appendix 3 – Workload Comparisons

Activity	2006/2007		2007/2008		2008/2009		2009/2010	
	Completed	Missed	Completed	Missed	Completed	Missed	Completed	Missed
Food hygiene inspections	676	12	898	10	742	0	657	64
Food standards inspections	389	27	321	9	266	0	309	37
Revisits	50		111		183		158	
Number of premises	1367		1386		1367		1371	
Broadly Compliant Hygiene					86.8%		86.7%	
Broadly Compliant Standards					89.5%		95.7%	
Food hygiene inspection performance indicators (inspections completed by due date) <i>** Indicator now measures %age completed within the year.</i>	Category	% on time	Category	% on time	Category	% on time	Category	% on time
	Approved	100	Approved	100	Approved	100	Approved	100
	6 months	100	6 months	100	6 months	100	6 months	100
	12 months	100	12 months	97.9	12 months	98.5	12 months	96.8
	> 12 months	97.6	> 12 months	82.8	> 12 months	98.1	> 12 months**	87.2
Food standards inspection performance (inspections completed by due date) <i>** See food hygiene</i>	A	100	A	90.9	A	100	A	100
	B	93.7	B	75.2	B	96.1	B**	76.9
	C	93.8	C	71.4	C	94	C**	75.5
	Unrated	93	Unrated	71.6	Unrated	90.7	Unrated	91.9
Number of enquiries	625		572		556		476	
% Enquiries responded to in 2 days (Target 90%)	89%		92%		93%		83%	
Number of food complaints	30		41		42		40	
Number of premises complaints	174		151		182		126	
Food alerts	61		51		71		33	
Advisory visits	273		329		61		71	
Infectious disease investigations	232		224		228		234	
Export certificates	33		21		10		26	
Food condemnations	3		11		0		1	
Samples taken	Type	No.	Type	No.	Type	No.	Type	No.
	Food Chem	392	Food Chem	410	Food Chem	356	Food Chem	376
	Food micro	316	Food micro	359	Food micro	331	Food micro	330
	Milk radiation	11	Milk radiation	11	Milk radiation	6	Milk radiation	6
	Water mains	34	Water mains	9	Water mains	24	Water mains	27
	Water private	3	Water private	33	Water private	23	Water private	29
	Swimming pool	86	Swimming pool	60	Swimming pool	77	Swimming pool	72
Reports to fiscal	0		0		3		2*	
Emergency Closures (including voluntary)	1		1		2		8	
Number of staff available	10		8		8		6	
£ Cost / Head of population / year (Per Week)	£3.17 (€0.06)		£3.14 (€0.06)		£2.87 (€0.06)		£2.90 (€0.06)	

*Actual reports submitted. A number of reports (4 in progress) will be submitted in 2010 for offences during 2009/2010.



Appendix 3 Workload Comparisons

Inspection Workload

Table 1. Food Hygiene Inspections 2010/2011.

COP Risk Category	Total No in Category	Required Inspection Frequency	Planned Inspections for 10/11
A	13	every 6 months	26
B	145	every 12 months	145
C	584	every 18 months	454
D	185	every 24 months	76
E	375	every 36 months	158
Not risk rated	73		73
Alternative Enforcement	14	Every 36 months	3
TOTALS	1389		922

Table 2. Food Standards Inspections 2010/2011.

COP Risk Category	Number in Category	Required inspection frequency	Planned inspections 10/11
A	7	12 months	7
B	169	24 months	103
C	1076	60 months	327
Not risk rated	107		91
Alternative enforcement	26	60 months	2
TOTALS	1385		530

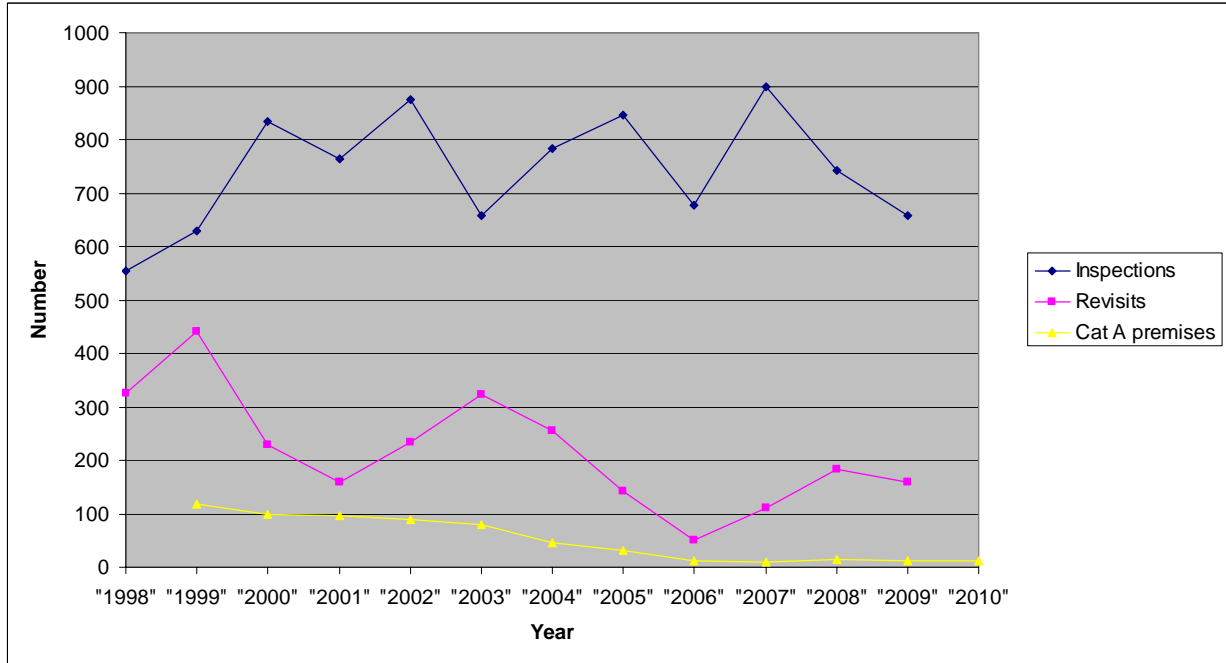
Table 3. Approved premises inspections 2010/2011.

Type of premises	Number in category	Inspection frequency	Planned inspections
Meat products	0	3 in 12 months	0
Fishery products	3	2 in 12 months	6
Dairy products (production holdings)	17	1 in 24 months	17

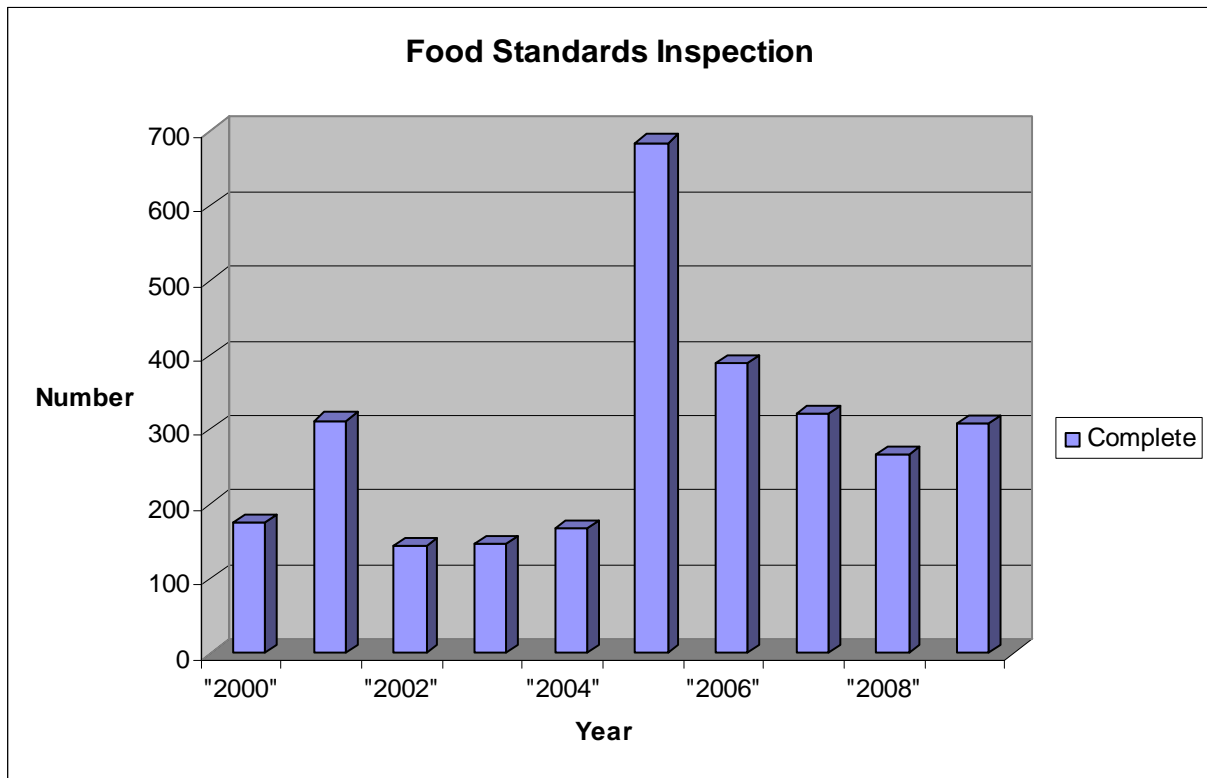


Appendix 3 – Workload Comparisons

1. Food hygiene inspections / Revisits / Category A Rated Premises

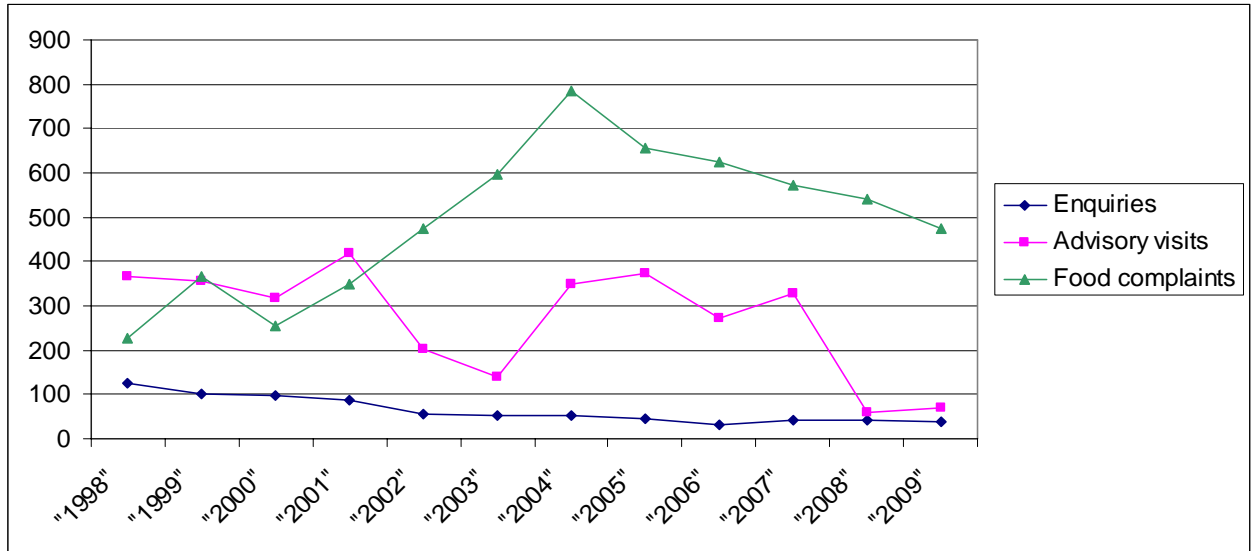


2. Food standards inspections completed.

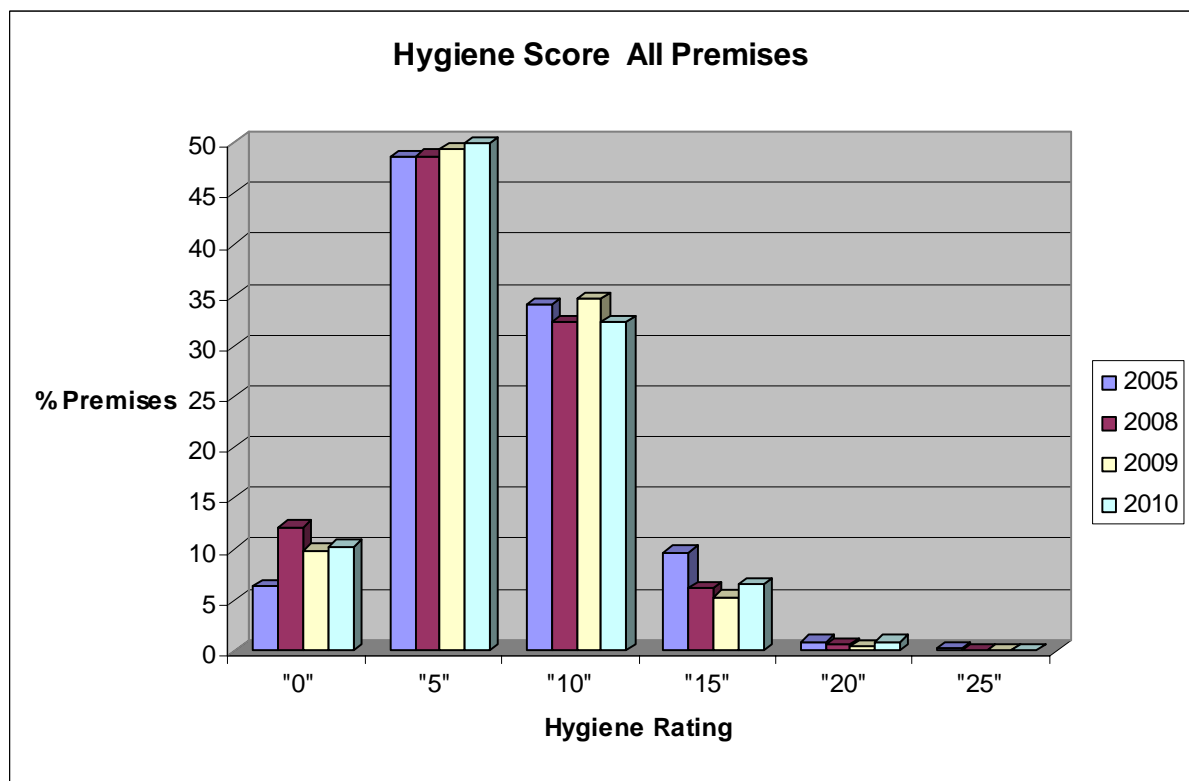




3. Food complaints / advisory visits / general enquiries

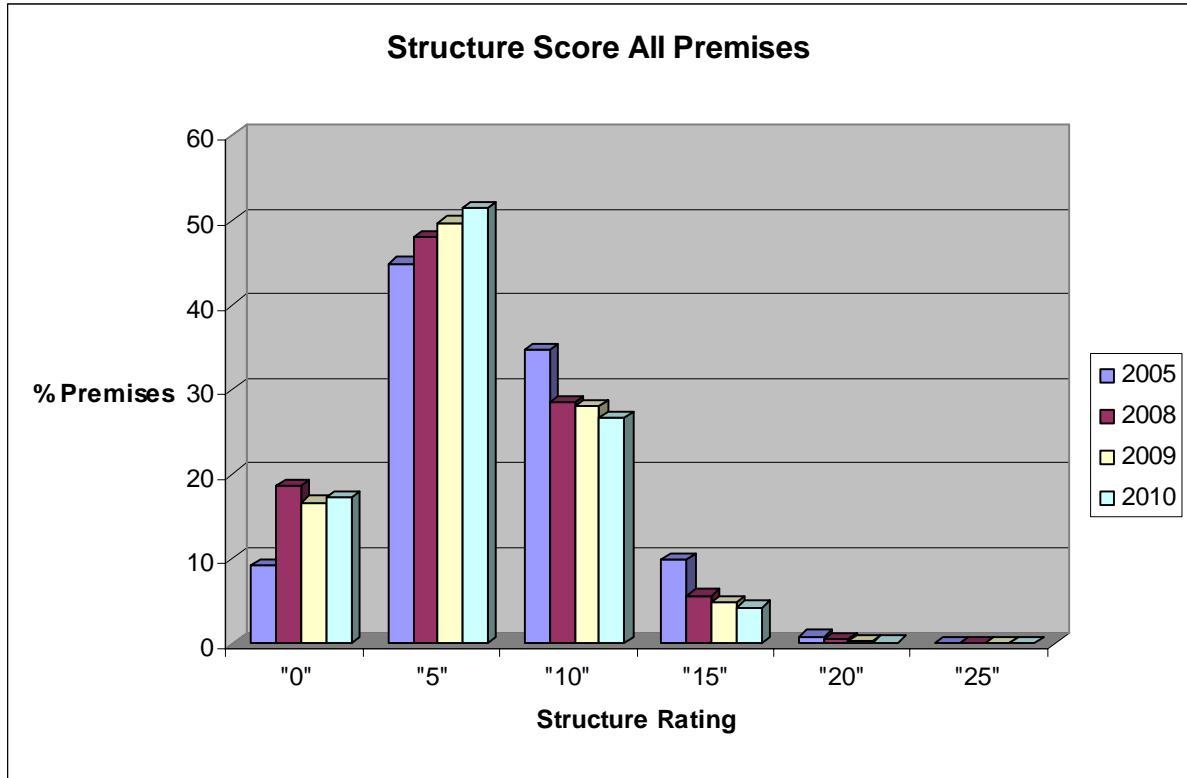


4. Hygiene Scores – All Premises

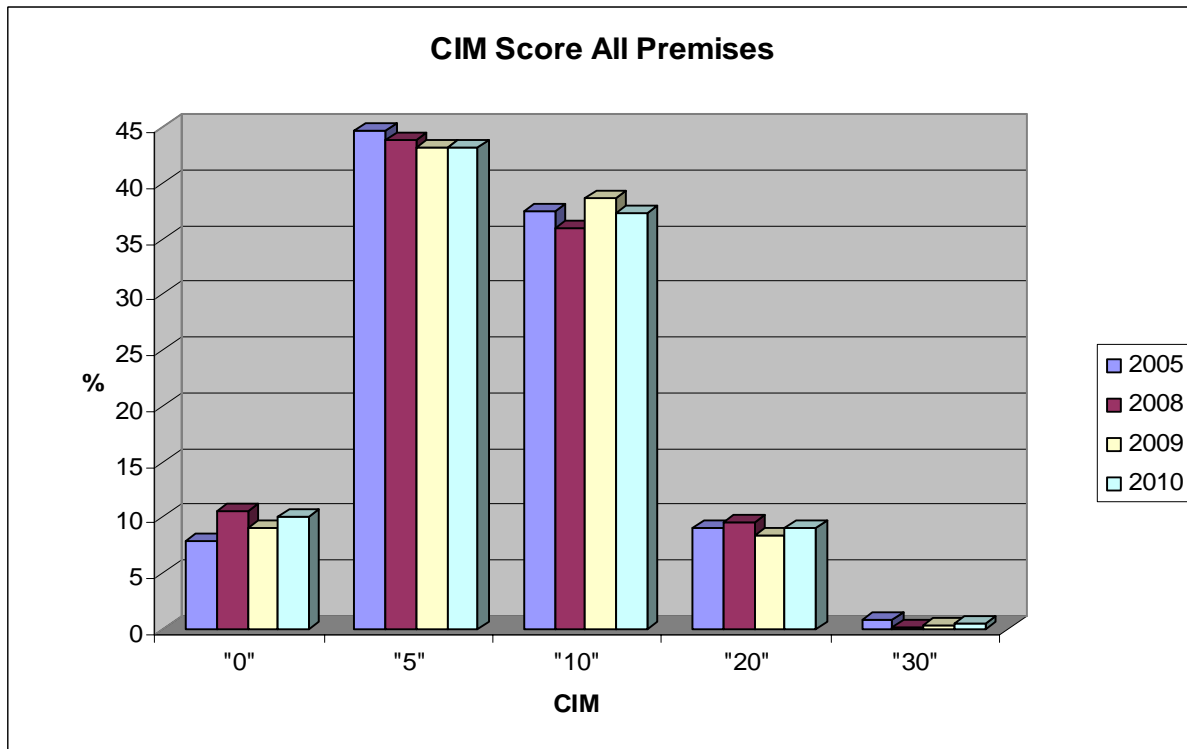




5. Structure Scores – All Premises

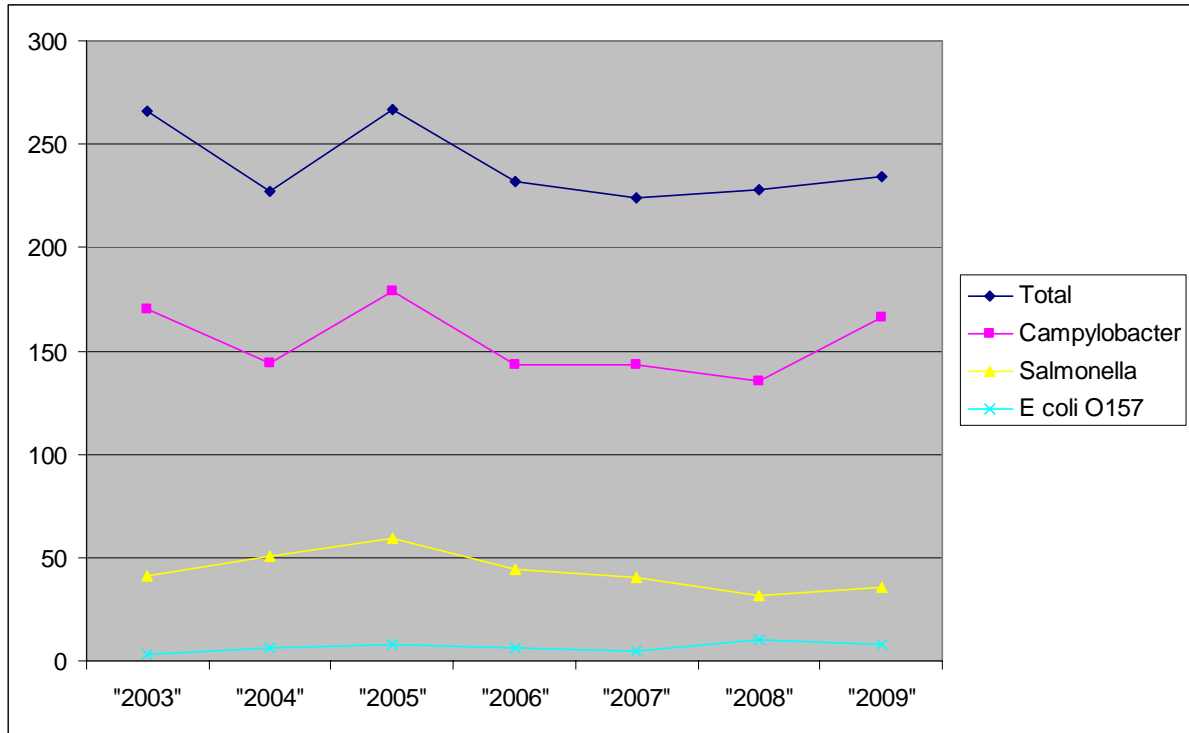


6. Confidence in management score – All Premises

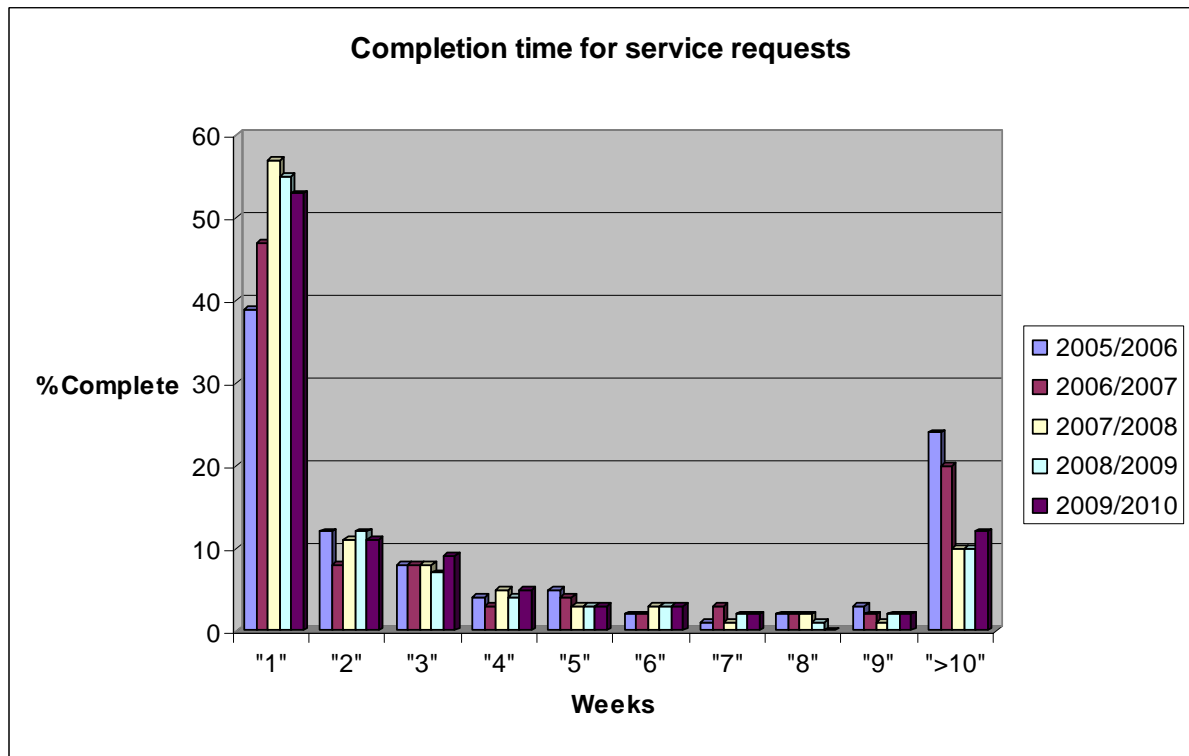




7. Infectious Disease Notifications



8. Service request completion times





Appendix 4 – Customers / Partners / Stakeholders

GROUP	RELATIONSHIP	HOW WE COMMUNICATE	PROPOSED FOR 2010/2011
<p>Businesses within West Lothian</p>	<p>Inspections; application of legislation; advisory activities; investigation into incidents, sampling, education, training, enforcement, motivation. New business support.</p>	<p>Provide guidance, training, technical information, guidance notes, information leaflets, talks, seminars. Use of Interpretation and Translation for ethnic languages, press releases, mail shots etc.</p> <p>Consultation – e.g. new inspection reports, dairy guidance, hygiene inspections evaluation. Use of interpretation and translation and improve training opportunities for non-English speaking food handlers. Improved communication in relation to new hygiene regulations, cooksafe, animal by products, illegal meat / imported food. Greater focus on new businesses.</p>	<p>Work with community health care partnership to promote healthier menu options in catering establishments. Work on health promoting businesses project.</p>
<p>Public</p>	<p>We protect them. We investigate complaints on their behalf. We provide guidance and information.</p>	<p>Press releases, infectious disease information sheets. Customer feedback on food complaints.</p>	<p>No change to current approach.</p>



FSA	They provide direction and guidance on a partnership basis. We report to them annually. They audit our performance.	Audit reports. We consult them on technical guidance and policy. They consult with us on legal, policy and technical matters.	Implement changes in reporting of enforcement activity – LAEMS. Audit by FSA – May 2010.
Members (Councillors)	We respond to complaints and enquiries and provide information as required.	Reports to Council. Advice to licensing board. Annual Service Plan is presented to Council for approval.	Increase the amount of information being supplied to the Bulletin, which is aimed at councillors.
Other LA Services – Planning, Building Standards, Legal & Licensing, Facilities Management, Education services, Community Health Care Partnership	Act as statutory consultee. Provide and receive guidance and support. Work in partnership in specific areas of interest.	Planning and building warrant application comments. Licensing applications and comments. Reports as required. Meetings e.g. Food & Health Steering Group.	Meetings have been introduced with domestic services, as required, to discuss common issues from inspections. To highlight implications of Welsh E coli inquiry with other council services providing food.
Lothian NHS	We work together on investigation and control of infectious diseases.	EHO/HPT meetings. Sporadic and outbreak plans.	No change to current approach. Proposed joint health protection plan.
Other local authorities	Share information and best practice. Sampling initiatives.	Liaison groups Benchmarking group	No change to current approach.
PF and legal system.	Take legal action based on reports sent by us.	We send reports. Work together on content of report. We provide technical guidance.	To send reports electronically.
Care Commission	Act as Consultee / Advisor	Written reports and telephone calls to Care Commission Officers	No change to current approach.



Appendix 5

2009/2010 Projects.

Initiative / Project ref:	Initiative / project outline	Desired Outcome	Measure of Success	Performance		Responsible Officer(s)	Start date	Finish date	Capital expend fest	Revenue expend fest	Outcome
				Current	Target						
FS/2009/01	Improve awareness of food and health in catering businesses	Development of health promoting businesses scheme. Pilot project in Armadale.	Scheme developed and launched.	0	20 businesses (Pilot)	C Smith	01/04/09	31/03/10	£0	£1000	Work continuing into 2010/2011.
FS/2009/02	Review of inspection paperwork and standard correspondence	Update and ensure all correspondence and paperwork is produced in line with service delivery and legal requirements	All necessary paperwork / systems reviewed and updated	-	Revised standard letter/ means of email communication / aide memoire	N Esson C Joss I Marshall	01/04/09	31/03/10	£0	£1000	Work completed. New style report for 2010/2011.



Appendix 6

Proposed projects 2010/2011

Initiative / Project ref:	Initiative / project outline	Desired Outcome	Measure of Success	Performance		Responsible Officer(s)	Start date	Finish date	Capital expend fest	Revenue expend fest	Outcome
				Current	Target						
FS/2010/01	Improve awareness of food and health in catering businesses	Development of health promoting businesses scheme. Pilot project in Armadale.	Scheme developed and launched.	0	20 businesses (Pilot)	C Smith	01/04/10	31/03/11	£0	£1000	



Appendix 7

Overview of food interventions policy:

The Food Law Code of Practice (Scotland) advocates achieving compliance through the use of a range of interventions and allows local authorities some flexibility in the type of intervention used at a food business.

West Lothian Council recognises that different approaches are required to ensure a business complies with the law in terms of food hygiene and food standards. It is however important to recognise that the approach used by officers will be determined by the circumstances identified at the time of a visit and not in advance.

It is recognised that the code of practice expects a risk based approach to inspections is put in place by local authorities. With this in mind West Lothian Council has always established a priority basis for workload, as follows:

FIRST – Emergencies, threats to public health and other essential reactive and proactive work, e.g. infectious disease investigations, outbreaks, food alerts for action, high priority complaints, revisits and follow up formal action to protect public health etc.

SECOND – Carry out planned inspections to ensure compliance with the law. Priority is to be given to Category A, B, and approved premises for hygiene inspections. Offering advice to new, potentially high risk, businesses to ensure compliance and minimise the need for future enforcement action.

THIRD – Carry out planned inspections of high risk category C and unrated premises for food hygiene, and category A premises for food standards.

FOURTH - All other work, e.g. projects, enquiries, lower risk inspections for hygiene and standards, lower priority complaints etc.

Food Hygiene

Category	Inspection target	Intervention
A	By due date (+ 28 days)	Inspection
B	By due date (+ 28 days)	Inspection
C	Within financial year	Inspection
D	Within financial year	Inspection
E	Within financial year	Alternative enforcement*
Unrated	Within 3 months** or 6 months of registration	Inspection
853/2004 establishment	As per code of practice determined frequency	Inspection
*Includes premises with no inspectable risk (already categorised as alternative enforcement) **Premises handling open high risk foods, e.g. catering.		



Food Standards

Category	Inspection target	Intervention
A	By due date (+28 days)	Inspection
B	Within financial year	Inspection
C	Within financial year	Alternative enforcement
Unrated	Within 6 months of registration.	Inspection

Inspections and Interventions

All inspections and interventions will be carried out in accordance with West Lothian Council's inspection procedures and enforcement policy. Inspections will be conducted in accordance with chapter 4.2 of the Food Law Code of Practice (Scotland) and will utilise the appropriate West Lothian Council inspection aide memoire.

Alternative Enforcement – Food Hygiene & Food Standards

In line with the principles of the Food Law Code of Practice (Scotland) West Lothian Council ensures that priority is given to food premises which present a greater risk to public health and food safety. In order to do this a hierarchical approach to inspections and visits has been established. In order to ensure the best use of the staff resources we have available and also ensure that we maintain a level of intelligence regarding premises within our area it has been appropriate to remove a number of food premises from our routine inspection programme and target them through an alternative enforcement approach.

Premises which are subject to alternative enforcement have been identified above.

Officers undertaking alternative enforcement within such premises will not need to be qualified as per code of practice requirements. The purpose of this approach will be to establish the operating arrangements of such premises and distribute appropriate guidance to food business operators. A record of such visits will be completed and held electronically. Should there be a change in the business operation likely to change the inspection rating of the premises then such matters will be referred back for a qualified officer to pursue.

The purpose is to link in with work already being done by other non food officers and ensure a better system for gathering information and maintaining business contact.

Where the premises is deemed to be operating in a way which requires no further intervention by a qualified officer then a rating will be applied to maintain the premises within its current category and ensure a further visit is made within the time frame for such premises outlined in the code of practice – i.e. 3 years for food hygiene, and 5 years for food standards.

This approach will be kept under review.



Non – Broadly Compliant Premises

Following an inspection any premises which does not meet the broadly compliant criteria should be subject to further intervention. Such action should be implemented no later than 1 month after the initial inspection. Officers will determine the most appropriate action giving consideration to the West Lothian Council enforcement policy and inspection procedures.

Interventions will be recorded by officers, and may include:

- Further inspection and audit;
- Verification and surveillance;
- Advice and education;
- Formal sampling.

Change of Ownership / Premises

An officer will inspect a changed premises for food hygiene, food standards, and health and safety irrespective of what the initial planned inspection was for. Risk ratings will be applied against the new premises details.



Appendix 8

Food Sampling Plan 2010/2011

Chemical Samples	Number	(£)Cost /sample	Total Cost (£)
Complaints	25	35	875
Raw milk	0	3	0
Mince	0	25	0
Meat products (sausages, burgers, etc)	40	45	1800
Meat products (pastries)	20	35	700
Survey LS9 (salt)	10	10	100
Spirits	25	25	625
Misc/reactive	16	30	480
Colours in takeaways	25	10	250
MSG re-sampling/sampling	20	10	200
Surveys	55	30	1650
Nutrition/Projects	44	30	1320
FSA work	0	0	0

Micro Samples	Number	(£) Cost /sample	Total Cost (£)
Cakes (cream/bcf)	12	£69.91	838.96
Pre - inspection related	155	£69.91	10836.56
Pre - inspection related - rice	0	£69.91	0
ice cream	10	£52.46	524.62
steak pies	11	£69.91	769.05
Ice cubes	20	£32.78	655.64
Raw milk	0	£24.61	0
Surface swabs	20	£12.31	246.13
Surveys	62	£84.87	5262.06



Appendix 9

Enforcement Case Study:

The following case studies highlight the nature of activity and time involvement required following three inspections completed during 2009/2010. They are by no means unusual outcomes to inspections where food safety concerns are identified.

The purpose of inspections is to ensure compliance with food safety legal requirements aimed at protecting public health. It is the responsibility of food business operators to ensure they comply and produce safe food. However, it is an officer's responsibility to ensure that risks to food safety, once identified, are removed by the food business operator.

Legal action can only be taken where two officers are witness to the offences etc. This has an additional time burden and demand on other aspects of our inspection programme. This is highlighted at the end.

It is important to realise that our approach is taken in line with the Food Law (Code of Practice) Scotland, and other relevant guidance. Our inspection records and reporting methods have been developed over many years to ensure we have the most efficient and yet appropriate documentation for demonstration and recording of our activities.

Inspection of Butchers Shop. Inspection by CHS and GM. CHS attending to monitor the quality of inspection by GM as part of management role. The premise was new and unrated. Inspection was for both food hygiene and food standards. A number of serious concerns were highlighted. CHS took over responsibility from GM to ensure continued involvement once GM contract ended.

Date	Outline of activities	Time spent
27.11.09	Preparation of inspection paperwork etc.	30 mins.
	Inspection of premises by 2 officers. Time on premises 10.20am – 12.10pm. Travel to and from the premises.	2hrs 35mins (x2 officers = 5hrs 10mins)
02.12.09	Meeting at premises with food business operator to discuss inspection and concerns requiring attention. Time on premises 10am – 11.40am. Travel to and from premises.	2hrs 25mins (x2 officers = 4hrs 50mins)
03.12.09	Preparation of typed inspection report.	2hrs
04.12.09	Review and correction of typed report, compilation of letter, information sheets, email report, and update APP Database. Premises risk rated as category A for hygiene (highest category)	1hr.
15.01.10	Revisit to premises. Time on premises 10.25am – 12.30pm. Ongoing issues and no progress made in key areas. Travel to and from the premises.	2hrs 50mins



20.01.10	Review of paperwork and follow up report to visit on 15.01.10.	2hrs 30 mins
17.02.10	Meeting with food business operator at County Buildings to discuss concerns and look at proposed changes within the business necessary to comply with legal requirements.	1hr 30mins
25.02.10	Planned follow up visit. Unable to complete due to other enforcement activities. Planned new date 15.03.10	
08.03.10	Review of HACCP system. Partial review complete. Further clarification of issues required on site.	2hrs
15.03.10	Meeting on site with food business operator to discuss review of HACCP system and onsite operation. 10.15am – 12.20pm. Travel to and from premises.	2hrs 50mins
25.03.10	Preparation and write up of report regarding HACCP review and site visit. Further admin and APP database input.	2hrs
	Time involved to this point – with further visits and report pending.	22hours 10mins (1 officer) + 4hours 50 mins (other officer). = 27hours.

Inspection of takeaway premises. Inspection by CHS and EM. As well as a routine hygiene inspection it was intended as a training inspection for EM. The premise was a category A for hygiene and previous warnings had been issued. Therefore a witness to inspection was appropriate.

Date	Outline of activities	Time spent
10.02.10	Preparation of paperwork, file review etc.	30 mins.
	Inspection of premises by 2 officers. Time on premises 4.35pm – 7.30pm. A number of serious basic hygiene failings. Significant explanation required to resolve issues and a number of staff involved in restricting the flow of the inspection. Travel to and from premises.	4hrs. (x2 officers = 8hrs)
11.02.10	Updating inspection paperwork, finishing inspection notes. Review of photographs taken and attaching to inspection record. Production of typed inspection report. Emailing of report to food business operator. Telephone conversation with food business operator.	4hrs.
18.02.10	On site meeting with owner and staff to discuss inspection, action plan and changes required. 11am – 12.20pm. Travel time to and from premises.	2hrs. (x2 officers = 4hrs)
22.02.10	Review of documented food safety policy for the business. Provided at meeting on 18.02.10	1hr 30mins



23.02.10	Revisit to premises to check progress. Significant improvements and new safer practices introduced. Time on premises 4.30pm – 5.20pm. Travel time to and from premises.	1hr 30mins (x2 officers = 3hrs)
09.03.10	<p>Preparation of letter and report regarding visit on 23.02.10 and review of food safety policy comments. Emailing and updating APP with actions etc.</p> <p>Further visit planned for 04.05.10 to ensure ongoing compliance and also compliance with issues like training etc. which require longer time to complete.</p> <p>Time involved to this point – with further visits and report pending.</p>	<p>2hrs.</p> <p>15hours 30mins (1 officer) + 7hours 30 mins (other officer). = 23hours.</p>
<p>Inspection of takeaway premises. Inspection by CHS and EM. This was an unrated premise which was due for inspection in April. A customer complaint was received which needed to be investigated so the inspection was brought forward. EM was taken for training purposes but also to ensure presence of a witness if enforcement action was necessary. The result of the visit was the service of a hygiene emergency prohibition notice to close the premises.</p>		
Date	Outline of activities	Time spent
23.02.10	<p>Paperwork preparation, review of premises details on APP.</p> <p>Inspection of premises by 2 officers. Only partial inspection completed given the nature of the hygiene problems and no food business operator on site. Emergency action to close premises was required. Time of inspection 5.45pm – 7.30pm. Travel time to and from premises.</p>	<p>30mins.</p> <p>2hrs 25mins (x2 officers = 4hrs 50mins)</p>
	<p>On returning home worked on writing up notes, reviewing photographs and drafting notes for preparation of statement. Time of work 8.30pm – 11.00pm.</p>	2hrs 30mins
24.02.10	<p>Worked at home to prepare all paperwork necessary for application to court for hearing and HEPO. This included statement for court, report for food business operator, email contacts with legal services, phone and email contacts with food business operator, advising of other members of staff in EH, preparation of evidence such as photographs etc. Working time 8.30am – 6pm.</p>	9hrs 30mins.
25.02.10	<p>Working in office. Review & final preparation of paperwork for legal, including statement for EM. Notice of intention to apply was drafted, and application by legal services reviewed, corrected and finalised. Further emails associated</p>	5hrs 30mins.



<p>26.02.10</p>	<p>with events. Admin such as scanning and copying to legal.</p> <p>Premises inspection following request to open received on 25.02.10. Time of inspection 3.10pm – 4.30pm. Premises had not removed imminent risk conditions so notice served to remain closed. Travel time to and from premises.</p> <p>Return to office to copy notice and advise legal of action. Email to food business operator regarding action required before further visit next week.</p>	<p>2hrs 20mins. (x2 officers = 4hrs)</p>
<p>02.03.10</p>	<p>Further visit to the premises to assess compliance. Premise allowed to open. Time of inspection 6.10pm – 6.50pm. Travel to and from premises. Return home and email to legal regarding up date, some admin.</p>	<p>1hr 50mins (x2 officers = 3hours)</p>
<p>08.03.10</p>	<p>Completion of admin for HEPN, partial inspection of premises, scanning and attaching updates to APP to ensure completion of records. Email food business operator details of court hearing date and time.</p> <p>Further visit planned for 16.03.10 to complete hygiene inspection. Food standards and workplace safety inspection still to be completed as well.</p>	<p>1hr 30mins</p>
<p>16.03.10</p>	<p>Visit to premises to complete hygiene inspection, and also food standards and workplace safety. Time of inspection 5.20pm – 7.20pm. Travel to and from premises. Write up of notes at home – 30mins.</p>	<p>3hrs 30mins (x2 officers = 6hours)</p>
<p>17.03.10</p>	<p>Production of report for business on food hygiene, food standards and workplace safety issues following visit on 16.03.10. Updating of APP database regarding recent visits.</p>	<p>2hrs 30mins</p>
<p>24.03.10</p>	<p>Court hearing regarding service of HEPN. Travel time to and from court.</p> <p>Time involved to this point – with further visits and report pending.</p>	<p>3hrs (x2 officers = 6hours)</p> <p>35hours 15mins (1 officer) + 12hours 20 mins (other officer). = 47hours 40mins.</p>

It is important to note that in all cases further visits to complete the inspections mentioned are required. Therefore the time involved will be greater.

We require all officers to complete time records on a weekly basis regarding time spent on different activities. This allows management to monitor demand placed on the service and officers.



Whilst no inspection can be narrowed down or specified to a time period due to the unknown nature of what will be found, it is possible to try and average out the time spent on inspections. To give some context to the information regarding the above inspections – the time spent, in total, on these 3 premises is 98 hours (and counting).

In 2008/2009 our total time spent on food hygiene inspections was 4594 hours with 742 inspections being completed. This equates to an average time of 6.2 hours per inspection. Taking the time of 98 hours spent on these 3 premises, we would have accounted for 15.8 inspections in previous year. In fact going back to 2007/2008, our average inspection time was 4.9 hours, which would equate to 20 inspections.

Whilst it is accepted that such figures presented are average, it highlights the growing time demand on the service when dealing with problem premises, and gives an understanding into the impact on other workload.

It should also be recognised that in at least 2 of the 3 premises above the possibility of reporting the food business operators to the procurator fiscal was considered. Such reports are very demanding on time, and are estimated to take anywhere between 25 – 30 hours to complete for simple cases and much longer for more complex ones. Reports may still be required if further problems are identified or steps are not taken to maintain hygiene standards.



Appendix 10

Service Requests and complaints – service standards and prioritisation:

Response times and updates:

We will aim to respond to all enquiries within 2 working days of receipt. We will aim, if required, to update customers of progress within 28 days of receipt. Our response may be by phone, mail or email.

New business advice

We will provide initial advice over the phone, by email or letter. We will provide written guidance to assist (if required), and / or, direct customers to other sources of information.

Further assistance such as review of plans, or site visits will no longer be possible for routine new business work due to other workload demands.

Licensed premises – Section 50 Certificates

We will provide initial advice over the phone, by email or letter. We will provide written guidance to assist (if required), and / or, direct customers to other sources of information.

There will be no routine site visits. Final site visits will be carried out only after notification that the appropriate building warrant has been issued and premises are in finished condition ready for operation. The site visit will be carried out within 15 working days of request by the customer to the appropriate officer. If the premises is visited and not complying with requirements then further visits will be carried out. Revisits will be carried out within 15 working days of notification by the customer that works have been completed.

The timeframes reflect the need to balance other higher priority workload within the service.

Street trader application – Vehicle inspections – New Licences

We will provide initial advice over the phone, by email or letter. We will provide written guidance to assist (if required), and / or, direct customers to other sources of information.

Inspections of new vehicles to issue a hygiene certificate will be carried out within 15 working days of the customer requesting a visit with the appropriate officer.



These inspections will only take place on a specified afternoon or morning once a week.

The timeframes reflect the need to balance other higher priority workload within the service.

Investigation of complaints – food and drink, premises etc.

Complaints will be prioritised and addressed relevant to the nature of the concern.

The following types of concern are examples of those considered high priority:

- Cases of confirmed food poisoning linked to food establishment or food stuff.
- Numbers of unconfirmed illness associated with food establishment or food stuff.
- Foods subject to serious contamination or in a condition likely to be a risk to public health.
- Complaints regarding poor hygiene conditions within premises likely to give rise to contamination of food being prepared.
- Complaints regarding illness or infection associated with drinking or recreational water.

The following types of concern are examples of those considered low priority. They are likely to be subject to referral to a future inspection or other intervention:

- Complaint of out of date food being sold. Unless there is a poor history within the premises, or after a number of similar complaints in a short period of time.
- Complaints about front of house hygiene conditions in premises. Unless there is a poor history within the premises, or after a number of similar complaints in a short period of time.
- Complaints about drinking and recreational water not linked to illness or infection. Complaints about mains water will be referred to Scottish Water and the Drinking Water Quality Regulator.
- Complaints regarding quality and nature of food and drink sold in food premises. Unless there is a poor history within the premises, or after a number of similar complaints in a short period of time.