

PERTH AND KINROSS COUNCIL

FOOD AND FEEDING STUFFS  
SERVICE DELIVERY PLAN

Revised February 2007

## **Introduction**

This Service Delivery Plan has been drawn up in accordance with the Service Planning Guidance contained in the Food Standards Agency's "Framework Agreement on Local Authority Food Law Enforcement" and provides the basis on which this Local Authority will be monitored and audited by the Food Standards Agency. This Plan supplements, in the common format required by the Agency, the food & feedingstuffs components of the overall Business Management and Improvement Plan approved for The Environment Service.



## **PERTH AND KINROSS COUNCIL**

### **FOOD AND FEEDING STUFFS SERVICE DELIVERY PLAN**

#### **1. Service Aims and Objectives**

##### **1.1 Aims and Objectives**

The Environment Service through its Food Safety and Trading Standards Divisions aims to ensure the consistent and effective enforcement of Food Safety, Food Standards and Feeding Stuff legislation within the Perth and Kinross area. These duties will be carried out with due attention to the requirements of Statute, Codes of Practice and Guidance issued by the Food Standards Agency (Scotland), Central Government and Associated Agencies. All enforcement activities will be guided by the terms of the Enforcement Concordat and the Council's general duties in terms of the Race Relations Act 1976 (Statutory Duties) (Scotland) Order 62/2002.

##### **1.2 Links to Corporate Strategies and Plans**

The Environment Service's role in relation to Food and Feeding Stuff enforcement is defined by the Strategic Priorities of the Councils Corporate Plan "to work towards creating safer communities in Perth & Kinross", which challenges the Council to ensure that all its citizens benefit from the quality of life the area has to offer, and to ensure a safe secure and healthy environment through the provision of quality public services. These priorities will be actioned by the provision of a range of frontline Council Services aimed at protecting the health, welfare and environment of the public and businesses in Perth and Kinross and will be realised by:

- The provision of statutory services and inspection programmes in relation to Food Hygiene, Food Standards and Feedingstuffs;
- Providing staff with adequate training, support and management leadership to encourage them to achieve their full potential as the Councils most valuable resource to provide the best possible levels of service to the public and businesses;
- The delivery of services in a cost effective manner which gives the Council the best quality and best value for money with respect to the resources allocated;

- Working with partners in the public, private and voluntary sectors to promote food safety and food standards messages and develop an understanding of community needs;
- A commitment to services based on equality, efficiency and effectiveness;
- The provision of services which are available, acceptable, flexible and responsible.

In an effort to promote consistent commitment to the improvement of service delivery the following initiatives have been implemented.

The Food Safety Division of Perth and Kinross Council currently hold a Charter Mark Award for Service Delivery in the area of food hygiene enforcement and advice services which was initially granted in 2000 and was successfully regained in 2003 and 2006. Perth and Kinross Council is the only authority in Scotland to have been awarded the Charter Mark on three consecutive occasions for food law enforcement services.

In addition the Food Safety Division represents Perth & Kinross Council on the East of Scotland Food Liaison Group and the Scottish Food Enforcement Liaison Committee which seek to ensure the consistent and effective use of all food law enforcement resources.

The Trading Standards Manager is a member of the Society of Chief Trading Standards Officers in Scotland (SCOTSS). The Society is made up of a representative of each local authority in Scotland and seeks to identify continuous improvement and best practice in the core functions provided by Trading Standards Services in Scotland. The Trading Standards Service currently holds Quality Mark Scotland status for their consumer advice service.

## **2. Background**

### **2.1 *Profile of the Authority***

Perth and Kinross is a vast and varied area of some 2200 square miles which encompasses both highland and lowland landscapes and has a population of approximately 135,000 people of whom around 70% are rural dwellers.

The major population centre is Perth with smaller satellite towns at Blairgowrie, Kinross, Crieff, Pitlochry and Invergowrie. There are also a number of rural communities in the landward areas, some of which in the Highland area of Perth and Kinross are extremely remote e.g. Kinloch Rannoch.

It is evident from the foregoing that the characteristics of Perth and Kinross and its population have implications for the Councils services and the way in which they are delivered. The dispersed nature of communities presents a challenge to the Council to deliver quality services to all citizens of Perth and Kinross regardless of their location.

## **2.2 Organisational Structure**

The organisational structure of Perth and Kinross Council in relation to Food Safety, Food Standards and Feedingstuffs enforcement is detailed in Appendix A to this document.

Food Safety, Food Standards and Private Water Quality legislation is enforced by the Food Safety Division under the Food / Health and Safety Manager and Feedingstuffs legislation is enforced by the Trading Standards Service under the Trading Standards Manager.

## **2.3 Scope of the Service**

The **Food Safety Division** provides the following services:

- Programmed inspections of food businesses in respect of Food Safety and Food Standards requirements in line with published guidance.
- Free support to local food businesses via regular food law compliance seminars.
- Enforcement of legal requirements in respect of food law e.g. the issue of warning letters, Hygiene Improvement Notices, Hygiene Emergency Prohibition Notices, Reports to the Procurator Fiscal etc.
- Investigation of notified cases of food poisoning or other communicable infections.
- Investigation of food complaints or complaints about food premises.
- Licensing and inspection of food traders e.g. game and venison dealers.
- Approval of relevant premises in terms of EU Hygiene Regulations e.g. Meat Products Manufacturers, Milk Processors etc.
- Sampling of foodstuffs for chemical analysis or bacteriological examination under contract to Scientific Services, Dundee City Council.
- Control of imported food where necessary.
- Consultation advice to the Licensing Board other Council Services and external partners e.g. Education Services; Care Commission.

- Food Hygiene Training for the voluntary and private sectors and other Council Service staff.
- Enforcement of the Private Water Supplies (Scotland) Regulations 2006 and associated sampling activities.
- Consultation advice on Civic Government (Scotland) Act 1982 licensing e.g. Public Entertainment, Market Operators, Street Traders.
- Advice on all food safety and food standards matters to the general public and other stakeholders.
- Responding to “Food Alerts” issued by the Food Standards Agency in an appropriate manner.

**Trading Standards** provide the following services:

- Enforcement of criminal legislation under the headings of Agriculture, Fair Trading, Metrology and Safety in accordance with an Enforcement Policy based on the Enforcement Concordat. Actions range from verbal warnings and statutory notices through to formal reports to the Procurator Fiscal.
- Risk-based inspection of premises by ‘due date’.
- Investigation of complaints alleging breach of criminal legislation.
- Provision of advice and guidance only in respect of civil complaints.
- Pro-active monitoring of relevant traders within Perth and Kinross to protect businesses and consumers from trading malpractice.
- Business advice service for local traders to assist their compliance with new and existing legislative requirements.
- Sampling / test purchasing of goods including animal feedingstuffs to ensure they meet the requirements of relevant legislation.
- Control of imported animal feedingstuffs.
- Licensing/registration of premises storing/supplying petroleum, explosives and poisons.
- Registration and Approval of premises under the Feed (Hygiene and Enforcement) (Scotland) Regulations 2005.
- Verification and calibration of weights, measures, weighing machines and other weighing and measuring equipment, including equipment used for animal feedingstuffs purposes.

- Talks and seminars for interested parties on the work of the Trading Standards Service.
- Provision of general consumer advice in partnership with Consumer Direct.
- Trading Standards also co-operate in a multi-agency approach to certain areas of enforcement and work closely with Tayside Police, Inland Revenue, Customs and Excise and Benefits Agency etc.
- Trading Standards also adhere to the LACORS 'Home Authority' principle.

## **2.4 Demands on the Service**

### **Food Safety / Food Standards**

There are currently almost 1900 registered food premises in Perth and Kinross categorised as follows:

Primary Producers	101
Slaughterhouses	2
Manufacturers	29
Packers	7
Importers	1
Distributors	40
Retailers	499
Restaurant / Caterers	1185
Materials and Articles	-
Manufacturers selling mainly by retail	26

Included in the above are 10 premises requiring approval under the new EU Hygiene Regulations ie

Fishery Products Premises	2
Meat Products Premises	7
Dairy Products Premises	1

In addition to the foregoing there are two large Natural Mineral Water bottling plants located in the Blackford area.

The Food Safety Division is split into two distinct teams, one dealing with programmed inspections of food premises and any enforcement action arising from these inspections (Food Hygiene) with the other handling all other food related matters including food sampling, food standards (composition, labelling etc), food complaints, licensing and advisory services for the general public, other bodies and the business sector (Food Standards). In addition the latter team enforces legislation in relation to the monitoring of private water supplies. Food Safety Staff are also involved annually in a number of large licensed

events such as T in the Park, Perth Agricultural Show, Blair Atholl Horse Trials and Highland games throughout the district. There is a large farmers market held in Perth city centre on a monthly basis with a continental market also being held twice yearly. The continental markets are inspected each time they are held but due to the low risk associated with the farmers market they are inspected on an annual basis.

Perth harbour falls within the jurisdiction of the food safety team with respect to hygiene standards on ships and imported food. There has not however been any food imported via Perth harbour for some considerable amount of time and The City of Dundee Council are the nominated Port Health Authority for ships entering Dundee or Perth harbours.

### ***Staffing***

The Food Hygiene Team is comprised of a Principal Officer (qualified EHO – 0.5 FTE) 1 EHO and 3 Food Safety Officers. Food premises are inspected as part of an annual risk based programme for food hygiene with the required workload distributed on a numerical basis. All premises approved under EU hygiene regulations are inspected annually in compliance with the current Code of Practice. The hygiene team are responsible for food standards (composition, labelling etc) enforcement in retail and catering premises.

The Food Standards Team consists of a Principal Officer (qualified FSO) 1 FSO and 2 Technicians. Food standards inspections in manufacturing premises are carried out in line with a predetermined risk based programme and a detailed programme of food sampling is drawn up on an annual basis. All other activities are responded to on a priority or agreed service level basis.

All food safety staff are authorised to carry out the tasks that their individual qualifications and experience allow and their deployment is in full accordance with the requirements of Food Law Code of Practice Scotland.

The diverse and largely rural topography of Perth and Kinross and the dispersed nature of some smaller communities and satellite urban centres means that travelling time to and from work activities accounts for a significant proportion of officer time with Food Safety staff individually travelling in excess of 4,000 miles per year. The seasonal operation of some premises, particularly in Highland Perthshire also requires some specific targeting of resources during the summer months.

### **Trading Standards**

There are approximately 1200 farms / holdings with livestock in Perth and Kinross which will require to be monitored in respect of the Feed (Hygiene and Enforcement) (Scotland) Regulations 2005. These

premises are spread over a large geographical area and all will need to be visited to determine whether or not registration or approval is required. Unannounced inspection or sampling visits could result in a failure to gain access thereby necessitating a large number of time consuming visits. This problem has been addressed by adopting a 'best practice' visit notification procedure.

Perth also has a busy inland harbour serving an extensive hinterland in east central Scotland. Significant amounts of raw materials used in the manufacture of animal feedingstuffs are imported via this route and are regularly sampled to ensure they meet the requisite standards.

From the 1 January 2006 the EU Feed Hygiene Regulations came into force and will require all feed businesses i.e. all businesses involved in the manufacture, supply, storage, transport, use and importation of animal feed, to be registered with the local authority.

This new regulation has resulted in a significant amount of officer time being spent on registering all these new feed businesses and updating the premises database.

These new businesses will then have to be included in the annual risk-based inspection programme.

### ***Staffing***

The Trading Standards Service currently has a compliment of 5 fully qualified Trading Standards Officers, a Consumer Advisor, 3 Technical Officers and an Animal Feedingstuffs Enforcement Officer. All Trading Standards Officers are multi-functional and enforce the full range of trading standards legislation (excluding animal feeding stuffs legislation), although each individual officer is responsible for a specialist area of enforcement.

All enforcement officers in the Trading Standards Team have full authorisation covering their particular areas of enforcement and carry these warrants with them at all times.

### ***General***

The Food Safety and Trading Standards Services operate from the Councils 'One Stop Shop' at Pullar House, 35 Kinnoull Street, Perth PH1 5GD. These offices are manned from 8.45 am to 5.00 pm Monday to Friday although flexible working hours allow staff to work between 8.00 am and 7.00 pm. Night time and weekend working is carried out dependent on the needs of the Service in relation to inspection programmes and monitoring of special events. An emergency contact list is operated outwith normal hours in conjunction with Tayside Police and Tayside Health Board NHS Trust and all authorised enforcement officers have been issued with mobile phones. In addition the Food Safety Manager and Principal Officers are on the

FSA's Food Alert text warning system. Access to Pullar House is available at all hours.

## **2.5 Enforcement Policies**

### **2.5.1 Food Safety / Food Standards**

Food Hygiene enforcement is carried out in line with the policy approved by the Public and Environmental Protection Committee of Perth & Kinross Council on 2 April 1997 as amended by a report to the Community Safety Committee on 30 November 2005. The policy is based on a clear communication of the outcome of food hygiene inspections with respect to levels of compliance with the relevant legislation and a position statement including possible enforcement actions where identified non-compliances are not remedied in accordance with prescribed timescales. Food Standards enforcement is carried out in terms of the policy approved by the Environmental Health Committee of Perth and Kinross District Council on 30 March 1994, carried forward by Perth and Kinross Council on 15 December 1995.

### **2.5.2 Trading Standards**

The Trading Standards Service continues to carry out enforcement actions in line with the Enforcement Policy that was agreed by the Public and Environmental Protection Committee on the 23 October 1996. The said policy was amended in June 1999 to comply with the requirements of the Enforcement Concordat.

## **3. Service Delivery**

### **3.1 Food Premises Inspections**

#### External Standards

Food hygiene inspections will be carried out to the minimum frequency based on the inspection rating scheme contained in Food Law Code of Practice Scotland and will focus on the priority higher risk A, B and C categories. The annual inspection programme will be prepared in April of each year with the performance in terms of the percentage of premises inspected in each category reported to the Food Standards Agency and Audit Scotland as required. Food standards inspections will be carried out to the minimum frequencies based on the inspection rating scheme contained in the Code of Practice with the focus on the higher risk A and B categories.

All "low risk " premises as defined in the Code will be the subject of an alternative enforcement strategy not less than once in every three year period in relation to food hygiene and food standards.

### Internal Standards

Performance standards have been set by the Food Safety Division with respect to the conduct and follow up procedures for all food inspections as follows:

- 33 % of Inspection outcomes will be monitored on a quarterly basis to ensure the quality and consistency of inspections and to check that any follow up action is in line with the Councils enforcement policies and prescribed timescales.
- Post inspection reports will be issued within 10 working days of inspections. Quarterly performance reports will be produced to assess achievement of target.
- Self audit checklists will be completed by Officers to ensure that all food hygiene/food standards inspection procedures and timescales are adhered to. 33% of self audit checklists will be monitored for accuracy on a quarterly basis.
- Premises databases will be updated with all inspection details, including outcomes and enforcement particulars within 10 days of inspection.

### Premises Profile

The inspection rating of food premises is determined by the performance of management in meeting minimum standards and therefore the profile of all businesses within the Council area is constantly in a state of flux. Premises improve their standards or fail to maintain standards and new premises open up on a continual basis to replace others, which close, change hands or simply spring up due to market demands. The current profile of food premises in Perth and Kinross (rated at 1 February April 2007) is as follows:

### **Food Hygiene**

Category	A	B	C	D	E	
Inspection Frequency	6 months	12 months	18 months	24 months	36 months	Total
No of premises	68	205	757	164	700	1923
No of inspections	136	205	504	82	233	1160

These figures reflect the average annual workload for this activity if all categories of premises were to receive regular visits at the required frequency. Details of the annual targets for inspection are contained in

the Food Safety Team Plan. The Food Hygiene Team will carry out all programmed inspections and any follow up visits necessary as a result of inspection outcomes. Approximately 10% of programmed inspections historically result in follow up action. Detailed annual performance targets will be included in the Food Hygiene Team Plan as part of the Business Management and Improvement Plan for the Environment Service.

### **Food Standards**

The current profile of food premises in Perth & Kinross (rated as at 1 February 2007) is as follows

Category	No of Premises	No of Inspections per year (pro-rata)
High Risk - annual		3
Medium Risk – every 2 years	98	49
Low Risk – every 5 years	1809	362

Food Standards inspections in the low risk category will be carried out during routine food hygiene visits by the Food Hygiene team. All manufacturing premises including butchers and bakers will be given dedicated food standards inspections concentrating on the presence or absence of quality management systems in terms of the Food Law Code of Practice Scotland. This workload will be actioned by the Food Standards team. All Food Standards inspections of premises Approved under the EU Food Hygiene Regulations will be carried out by the Food Standards team.

Detailed annual performance targets for inspection activities will be included in the Food Standards Team Plan.

### **Imported Foodstuffs**

There are no direct movements of imported food via Perth Harbour however arrangements will be implemented with the Harbour Master's office to ensure that early warning of any imports of food through the port are referred to the Food Safety team. Officers will collate data on all other imported foodstuffs during routine inspections of food premises as part of the standard inspection procedures now in place. As an integral part of the inspection process therefore resource allocation for imported foodstuffs is part of the overall inspection resource.

## **3.2 Feedingstuffs Premises Inspection**

Perth and Kinross Council will inspect all 251 animal feedingstuffs premises currently registered on our database. These premises are either involved in the manufacture, transport, storage, supply, importation or mixing of animal feedingstuffs.

When planning an inspection programme, priority will be given to the inspection of feed operators who are approved/registered with the Council. Where appropriate, steps will also be taken to seek out those feed businesses that should be approved/registered by the Council for inclusion in the inspection programme.

All premises visited will be risk-assessed in accordance with Food Standards Agency guidelines. High-risk premises will be visited annually, while medium and low risk premises will be visited every two and five years respectively. The number of revisits carried out will also affect the programmed inspections.

It should also be recognised that Perth and Kinross is a vast rural area and it cannot be guaranteed that the proprietors of rural premises will be there when an unannounced inspection is made.

A “best practice” inspection protocol has been implemented. The protocol involves written contact with the premises to be inspected to arrange a suitable inspection date and details the criteria which will be assessed during the visit thereby making better use of our officer resource.

There will be one fulltime officer involved in the enforcement of the feedingstuffs legislation.

### **3.2.1 Premises Records**

All food and feedingstuffs premises details are maintained on the services APP database which is specifically tailored to meet the demands of the Food Safety / Trading Standards activities and full inspection, sampling and other business related history records are available from the system. The database is regularly reviewed and updated and facilitates the planning of inspection and sampling programmes and the generation of management reports.

## **3.3 Complaints**

### **3.3.1 Food Complaints**

Approximately 250 complaints are received on an annual basis covering foodstuffs or food premises. The Food Standards Team will investigate all food complaints in accordance with the Council’s Food Standards enforcement policy. Chemical analysis or microbiological examination, if required, will be carried out by the Public Analyst, Scientific Services, Dundee City Council.

### **3.3.2 Feedingstuffs Complaints**

Perth and Kinross Council's Trading Standards Service will investigate complaints about any aspect of the feedingstuffs legislation in accordance with the standards/procedures set out in our Complaint Service Standards document and service procedural manuals.

All complaints will be actioned by the Animal Feedingstuffs Enforcement Officer.

### **3.4 Home Authority Principle**

Perth and Kinross Council support the Home Authority Principle as set out by LACORS. Trading Standards staff will follow the guidelines set out in the Trading Standards Manual when considering whether or not to implement formal action against food or feedingstuffs businesses located outwith the Perth and Kinross area for alleged non-compliance with food or feedingstuffs legislation.

Perth and Kinross Trading Standards Service has no formal Home Authority Principle agreements with any local feedingstuffs businesses. The Authority is however committed to offering assistance with these matters as Enforcing / Originating Authority when requested by any interested parties.

### **3.5 Business Advice**

#### **3.5.1 Food Hygiene / Food Standards**

A business advice service is available to everyone operating in the food sector and is operated by the Food Standards / Food Hygiene team. Advice is available in respect of the following:

- Setting up a new food business.
- Implementation of documented food safety management systems.
- Alterations to existing business.
- Compliance with Food Standards legislation eg food quality composition and labelling.
- Suspected food poisoning.
- Approval of Establishments in terms of EU Food Hygiene Regulations.

Approximately 500 enquiries per year are dealt with in respect of advisory services. In addition the Food Safety Division works closely with the Perthshire and Kinross Business Community via the Small Business Gateway, Perthshire and Scottish Enterprise Tayside in respect of food related matters.

### **3.5.2 Trading Standards**

A business advice service is available to all feed operators in the animal feedingstuffs sector. Advice can be obtained in respect of the following matters:

- The setting up of a new business.
- Quality control systems.
- General advice on compliance with the legislation.

The Animal Feedingstuffs Enforcement Officer will provide all business advice relating to animal feedingstuffs.

## **3.6 Sampling of Food and Feedingstuffs**

### **3.6.1 Food Sampling**

Sampling of food will be concentrated on foods manufactured within Perth and Kinross and distributed locally or beyond its boundaries on the Originating Authority principle to ensure that all such foods comply with the relevant statutory requirements relating to composition quality or safety. A sampling programme will be produced on an annual basis in conjunction with the Public Analyst / Food Examiner and in line with the service agreement existing between the Council and the Scientific Services Division of Dundee City Council. In addition samples will be submitted to the Public Analyst / Food Examiner, where appropriate, in connection with food complaints or food poisoning investigations and Perth and Kinross Council will participate in locally or nationally co-ordinated sampling exercises where required. Where deemed necessary, sampling activities will include imported foods. All sampling activities will be carried out in accordance with the Food Law Code of Practice Scotland and other appropriate guidance.

### **3.6.2 Feedingstuffs Sampling**

The sampling of feedingstuffs will be concentrated on feed materials imported into, or manufactured, mixed or supplied in Perth and Kinross. Any analyses will be carried out by the Public Analyst, Scientific Services, Dundee City Council. A planned programme of animal feedingstuffs samples will be carried out each year in conjunction with the said Public Analyst based on the priorities set out in the National Inspection Programme for Animal Feed Enforcement. In addition, samples will also be taken in the event of complaint about feedingstuffs or when participating in any co-ordinated surveys with the North of Scotland Quality Working Group.

All equipment used in procuring samples is located in the Trading Standards workshop within Pullar House and is maintained in a clean condition to minimise cross-contamination and calibrated, where necessary, at appropriate intervals.

### **3.7 Investigation and Control of Outbreaks of Food Related / Infectious Disease**

The Food Safety Division will investigate notifications of food-borne or other infectious diseases in line with the predetermined procedures and timescales agreed with Tayside NHS Board in order to:

- Establish the cause with a view to prevent recurrence.
- Prevent further spread by advising / excluding cases and appropriate contacts and arranging the seizure, or recall of suspected food sources.
- Initiate appropriate enforcement action in respect of legal non-compliance including emergency closure of implicated food premises.

Perth and Kinross Council will co-operate where required with Tayside NHS Board in the implementation and review, where necessary, of the Communicable Disease Major Incident Plan produced by the Tayside Joint Infection Control Committee in December 1999 (updated in 2003 in line with the Guidance on the Investigation and Control of Outbreaks of Food-borne Disease in Scotland issued by FSA Scotland in 2002).

### **3.8 Food Incidents / Hazards**

Local Authorities as Food Authorities are required to deal with any food incidents or food hazards they identify and any food alerts issued by the Food Standards Agency.

A “food incident” occurs when a Food Authority becomes aware that food or its labelling (e.g. presence of undeclared allergens) fails or appears to fail to meet food law requirements. A food incident can be a relatively minor matter or a major food hazard.

A “food hazard” is a food incident involving a biological, chemical or physical agent with the potential to cause an adverse effect on the health or safety of consumers.

A “food alert” is a communication from the Food Standards Agency to a Food Authority concerning a food hazard or other food incident.

Where a food incident is identified Perth and Kinross Council’s Food Safety Division will implement its fully documented procedures which have been drawn up in accordance with the Food Law Code of Practice Scotland to ensure that the incident is given the appropriate response in terms of its severity and distribution including where

necessary liaising with the Food Standards Agency (Scotland), the Police and Tayside NHS Board. Where a food alert is issued the appropriate actions detailed in the aforesaid procedures will be implemented.

### **3.9 Liaison with other Organisations / Agencies etc**

In an effort to promote an equitable and consistent approach to food law enforcement Perth and Kinross Council will engage in the following:

- Liaison with Dundee, Fife, Angus, Clackmannan, Falkirk and Stirling Councils as a member of the East of Scotland Food Liaison Group.
- Representation of the East of Scotland Food Liaison Group on the Scottish Food Enforcement Liaison Committee and relevant Sub Committees.
- Provision of representation on any other bodies relating to food law enforcement as requested.
- Respond as requested to appropriate consultations issued by the Food Standards Agency with respect to Food and Feedingstuffs Safety and Standards.
- Liaison with REHIS as an approved training centre for food hygiene training.
- Liaison with and advising other Services within Perth and Kinross Council on matters affecting food hygiene or food standards.
- Appraisal of Building Warrant submissions in respect of proposals to construct or alter food premises.
- Responding to consultation requests in respect of the Registration of residential and nursing homes, nurseries etc.
- Issuing food hygiene certificates in respect of new licensed premises for Perth and Kinross Licensing Board.
- Responding to consultation requests from Perth and Kinross Councils Legal Services in respect of Civic Government Licensing e.g. Street Traders, Public Entertainment, Market Operators etc.
- Liaison with Tayside NHS Board, Dundee and Angus Councils as a member of the Tayside Gastro-Intestinal Liaison Group.
- Liaison with other professional disciplines as a member of the Fife / Tayside Environmental Health / Veterinary / Medical Liaison Group.

- Liaison with other authorities in the SCOTSS North of Scotland Quality Working Group on matters relating to animal feedingstuffs.

### **3.10 Promotion of Food and Feedingstuffs Safety and Standards**

Perth and Kinross Council through its Food Safety and Trading Standards Services will promote food and feedingstuffs safety and standards by the following means:

- By the provision of free Elementary Food Hygiene and Food & Health courses to voluntary sector workers in line with the appropriate targets set by the Joint Health Improvement Plan.
- By the provision of free seminars on the implementation of appropriately documented Food Safety Management Systems and Food Law requirements for new businesses to all food proprietors and their staff in the Perth and Kinross area dependent on demand and available resources.
- By maintaining stocks of information and guidance leaflets, including those for whom English is not their first language, on all aspects of food safety and food standards which will be available to food businesses on demand.
- By co-operating in the provision of food hygiene training at Elementary and Intermediate level with Perth College and other providers, dependent on demand and available resources.
- By responding to requests for talks on food safety matters to schools, colleges and other organisations.
- By the implementation, on an annual basis, of the Councils Milk Hygiene Awards.
- By participation in the Food Standards Agency (Scotland ) Eat Safe Award Scheme
- By participation in the Scottish Consumer Council's Healthy Living Award Scheme.
- By utilising local media to publicise food safety, food standards and feeding stuffs matters e.g. local press etc.
- By targeting guidance material to appropriate audiences on Food Safety, Food Standards or Feedingstuffs issues by mail-shot e.g. GM food labelling, Beef labelling scheme etc.

Evaluation of promotional work will be carried out, where possible, e.g. post inspection questionnaires, uptake of premises on award schemes etc. General awareness of food safety messages is difficult to measure due to the wide target audiences and the hit and miss effect of the media used.

## 4. Resources

### 4.1 Financial

The **2007/2008** budget for food and feeding stuffs enforcement is as follows:

	Food	Feedingstuffs
Employee Costs	400,000	<b>33000</b>
Purchase of Samples	600	
Analysts Fees	50000	<b>12000</b>
Transport	24000	<b>2400</b>
Equipment etc	9000	
<b>Total</b>	<b>483,600</b>	<b>47,400</b>

Income	Food	Feeding Stuffs
Misc	4000	
<b>Total</b>	<b>4000</b>	

<b>Net Cost</b>	<b>479,600</b>	<b>47,400</b>
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### 4.2 Staffing

The staffing deployment for food and feedingstuffs enforcement is detailed in Appendix B to this document.

### 4.3 Staff Training and Development

Perth and Kinross Council operate an Employee Review and Development Policy, which covers all personnel. Professional training and personal development are linked to the desired outcomes of the Environment Service Business Management and Improvement Plan and the Team Plans for each individual service and an annual review of performance against individual targets is used to set goals for the coming year in respect of performance and further training. Training in core and supplementary needs is provided both internally and externally and all professional officers are required to maintain a file detailing all training received. All officers involved in enforcement activities will be trained to a level commensurate with their activities and, where appropriate, in line with the requirements of the Food Law Code of Practice Scotland.

The Animal Feedingstuffs Enforcement Officer authorised to enforce the feedingstuffs legislation will be suitably trained and will work to the guidelines set out in the code of practice introduced by the Food Standards Agency.

Enforcement of the new EU Feed Hygiene Regulation requires all duly authorised enforcement officers to be suitably trained to carry out their duties under the said legislation. The Animal Feedingstuffs Enforcement Officer has attended the requisite training.

## **5. Quality Assessment**

### **5.1 Food Safety**

Perth and Kinross Council will take sufficient steps to ensure that the levels of Service provided in the implementation of this Service Plan are monitored and evaluated in an effort to maintain a commitment to continuous improvement.

The level of service required to meet this standard will be monitored as follows:

- Fully completed inspection reports in line with the Food Law Code of Practice Scotland, will be maintained on file following every programmed inspection. Thirty three percent of inspections carried out per quarter will be reviewed by the Principal Environmental Health Officer (Food Hygiene) who will forward the results of checks carried out to the Food / Health and Safety Manager.
- All correspondence relating to revisits will be checked by the Principal Environmental Health Officer (Food Hygiene)
- Any reduction in the Inspection Ratings of high-risk premises (category A & B) will be agreed with the Principal Environmental Health Officer (Food Hygiene) or the Food / Health & Safety Manager.
- All post - inspection reports will be based on a standard format which clearly distinguishes between legal requirements and recommendations of good practice with any contravention's noted relative to the appropriate statutory requirements. In addition all correspondence will clearly indicate the premises position with respect to the Councils Enforcement Policies. Post - inspection reports will be reviewed as part of the in depth quarterly file checks on inspection reports and outcomes. In addition all outgoing food hygiene correspondence will be forwarded to the food hygiene team leader as a "yellow copy" to enable an overview of inspection activities to be maintained.
- All post - inspection correspondence relating to food standards inspections carried out in high or medium risk premises will be checked and countersigned by the Principal Officer (Food Standards/Water) or the Food / Health & Safety Manager in line with the agreed inspection arrangements for such premises. The food standards component of correspondence relating to low risk premises will be monitored by the Principal Environmental Health

Officer (Food Hygiene) as part of the previously mentioned “yellow copy” checks.

- All outgoing correspondence from the Food Standards team will be passed to the Principal Officer (Food Standards / Water) as a “yellow copy”, in order that an overview of the teams work can be gained.
- Monthly reports will be generated from the Flare database by Support Services for inspection, sampling, complaint and other activities to identify any gaps in data inputs. Copies of these reports will then be circulated to relevant staff in order that records can be updated.
- Incoming mail to the Food Safety Division will be routed through the Food Safety Manager in the first instance prior to distribution to the relevant staff via the Principal Officers. This will ensure that management of the Division are aware of the demands on the staff and the outcome of inspections, sampling, complaint activities etc.
- All premises inspected for Food Hygiene purposes will be sent a post inspection questionnaire on the performance of the inspecting officer and the quality of the post inspection correspondence. The results of this consultation will form the basis of an annual review of inspection procedures to ensure that food businesses can indicate whether or not the inspections are being carried out in accordance with Food Standards Agency guidance.
- The level of performance in relation to the issue of post inspection correspondence will be monitored on a quarterly basis against the 10 day output standard.
- All post inspection correspondence will contain a footnote inviting comments on the inspection to be relayed to the Food / Health and Safety Manager.
- Random checks will be made on the Councils food database to ensure that the necessary data has been accurately and timeously entered following food safety activities in line with the Councils Food Inspection Policy.
- All investigated food complaints will be followed up with a post investigation questionnaire to assess levels of performance against the service standard on an annual basis.
- All notifications of gastro-intestinal infection which are investigated by officers of the Food Standards team will be followed up on an annual basis by questionnaire to gauge the level of service provided against the level of service detailed in the service standard

- Complaints regarding the performance of food enforcement staff will be dealt with in line with the Council's Corporate Complaints procedure.
- At least 6 team meetings of all Food Safety Staff will be held per year with minuted records of all matters discussed and agreements reached. Minuted decisions on specific aspects of food safety enforcement will be used to develop a consistent approach to the work of the Food Safety Division.
- Officers will be accompanied at least once per year by either the Food / Health and Safety Manager or the relevant Principal Officer to gauge consistency in inspection methods.
- All food related enquiries will be dealt with in terms of the timescale stated in the Environment Services service standard leaflet.

## **5.2 Trading Standards**

The Trading Standards Service shall seek to ensure that the levels of Service set out in our published 'service standards' are met.

10% of all complainants and businesses seeking advice are consulted each month to ascertain the levels of customer satisfaction with complaint handling and business advice respectively.

The results of the surveys are used to seek improvements in these activities, where appropriate.

Regular meetings of all the staff within the Trading Standards Service are held to discuss relevant issues. Minutes of these meetings are kept by the Trading Standards Manager and identified issues actioned as appropriate.

## **5.3 Statistical returns**

Information on food law and animal feeding stuffs enforcement activities will be generated from the Service's database for inclusion in Performance Indicator reports and formal returns to the Food Standards Agency. The database will be regularly checked to ensure accuracy in terms of premises details and activity levels. All formal returns will be signed off at Service manager level prior to submission to the relevant bodies.

## **6. Review**

### **6.1 Review Against Service Plan**

The Service Delivery Plan will be reviewed on an annual basis by the Food Safety and Trading Standards Managers to assess its relevance to current operations and targets and shall be amended where such a review identifies significant changes. When deemed necessary the

Service Delivery Plan will be re-submitted to the appropriate Committee for approval. The annual review will assess performance against the targets set out in the Service Team Plans.

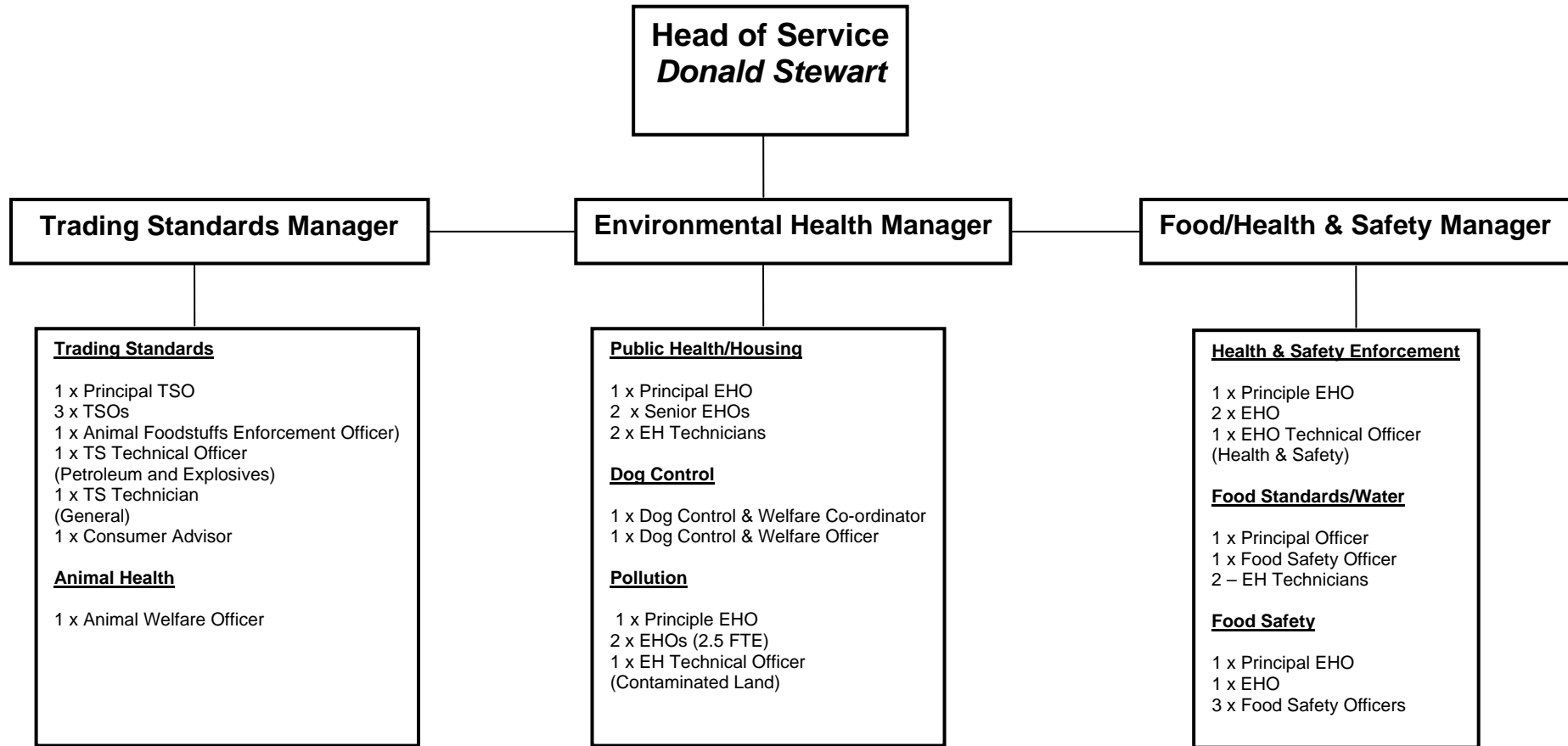
## **6.2 *Identification of Variances***

The Service Delivery Plan review will identify variances for any planned performance targets and account for these where practicable.

## **6.3 *Areas of Improvement***

The Service Delivery Plan review will include any proposed improvements necessary to offset identified variances or any quality improvements highlighted by ongoing quality assessment.

## Environmental Health, Food & Safety and Trading Standards Structure



## Staff Resources

Duties	Officers	Authorisation	FTE
Food Hygiene	3 x Food Safety Officers (FSO)	Higher Certificate in Food Premises Inspections Higher Certificate in Food Standards Inspections Service of Hygiene Improvement Notices Service of Emergency Hygiene Prohibition Notices Submission of reports to the Procurator Fiscal Inspection detention and seizure of food Procurement of Samples Registration of Food Premises	3
	1 x EHO	As above	1
	Principal E.H.O (Food Hygiene)	As above :	0.5
Food Standards	Principal Officer (Food Standards / Water) FSO	As above (FSO) plus all matters relating to Food Standards	0.7
	1 x FSO	as above (FSO) plus all matters related to Food Standards	1
	1 x Food Technician	Procurement of Samples Investigation of Food Product and Food Hygiene Complaints Composition and Labelling advice	1
Management	Food / Health and Safety Manager	As above (FSO) plus:  Issue and suspension of licences in respect of venison	0.8

		dealers, game dealers Approval of premises in terms of EU Food Hygiene Regulations Recognition of Natural Mineral Waters Lead Officer – Food Hygiene / Food Standards	
Feedingstuffs	1 x Animal Feedingstuffs Enforcement Officer	Inspection, approval and risk assessment of feed operators. Procurement of samples	1
Management	Trading Standards Manager	Service Planning, Performance reporting and reviewing of procedures	0.05