



To: Environment Policy Board

On: 26 August 2015

Report by: Director of Community Resources

Heading: Business Regulation Service Plan, 2015/16

1. Summary

- 1.1 Community Resources Business Regulation Team is responsible for the provision of statutory regulatory services on behalf of the Council in relation to Food Safety and Health & Safety at Work. These areas of work are delivered under guidance issued by Food Standards Scotland (FSS) and the Health and Safety Executive (HSE).
- 1.2 The Business Regulation Service Plan for Food Safety and Health and Safety at Work activities is included at Appendix 1. It sets out how we will deliver outcomes consistent with the requirements of Food Standards Scotland and the Health and Safety Executive. It is linked to the Community Resources Service Improvement Plan and to the Council and Community Plans.
- 1.3 Performance against the 2014/15 Service Plan was monitored and reported throughout the year. Notable highlights are presented in Section 3 below and full details are given in the review section of this Business Regulation Service Plan for 2015/16.

2. Recommendations

The Policy Board is asked to:

- 2.1 approve the statutory Business Regulation Service Plan, 2015/16 as attached at Appendix 1.

3. Background

- 3.1 The Business Regulation Service Plan for 2015/16 sets out priorities to be progressed, key tasks to be implemented, timescales and outcomes against which progress can be measured.
- 3.2 The Plan is submitted to the Environment Policy Board in order to fulfil our statutory obligations in relation to food safety and health & safety activities, and demonstrate that appropriate governance arrangements are in place. The Business Regulation Service Plan for 2015/16, detailing activities in food safety and health & safety is included at Appendix 1.
- 3.3 Performance against the plan is indicated in the Operational Performance and Service Improvement Plan Reports presented to the Environment Policy Board bi-annually.
- 3.4 Performance in 2014-15 is detailed in the Business Regulation Service Plan, 2015/16 at Appendix 1.

Notable achievements are:

- Successful delivery of a food hygiene and food standards inspection programme in line with the parameters set by the Food Standards Agency in Scotland.
- Completion of the agreed Food Sampling programme, which took into account both local and national priorities. This included a focus on the issue of meat substitution, where, for example, takeaway premises may substitute beef for lamb. As a result of the sampling programme, two food business operators were reported to the Procurator Fiscal.
- Completion of a programme of interventions to determine the level of gas safety in catering premises. A high level of compliance was found in this area, which can be attributed to the enforcement work and advice given to businesses by officers in the previous year.
- In line with a national priority, focussing on the control of infection at open farms, petting zoos and animal visitor attractions, advice and guidance was given to staff at a local petting farm. This type of facility is known to have been a factor in previous *E. Coli* 0157 infections.
- A series of interventions undertaken in warehouses within Renfrewshire to determine compliance with regulations on working from heights and use of

lifting equipment, two of the commonest causes of accidents in this sector. Standards were found to be high. Officers gave advice and guidance where minor contraventions were found.

- 3.5 In April 2015, Food Standards Scotland (FSS) replaced the Food Standards Agency (Scotland) (FSAS) as the national food body for Scotland. Food Standards Scotland was established by the Food (Scotland) Act 2015 as a non-ministerial office, part of the Scottish Administration, alongside, but separate from, the Scottish Government. It is responsible for food safety, food standards, nutrition, food labelling, and meat inspection.
- 3.6 FSS have stated that they intend to work closely with local authorities to maintain and improve food safety standards and the health of the nation and build on the good working relationship many local authorities, including Renfrewshire, had with the Food Standards Agency (Scotland). As part of that process they may set new targets for local authorities in relation to food safety matters. Details have yet to be provided by them on this, but we will take any guidance issued by Food Standards Scotland into account in developing future Business Regulation Service Plans.

Implications of the Report

1. **Financial** – none.
2. **HR & Organisational Development** – none.
3. **Community Planning** –

Jobs and the Economy – activity that helps businesses to comply with statutory requirements, challenges practices that put people at risk and creates an unfair advantage over compliant business operators, contributes to sustainable economic growth.

Safer and Stronger – interventions by the Business Regulation team, both in terms of food safety and health and safety at work contribute to making Renfrewshire a safer place to live and work.
4. **Legal** – none.
5. **Property/Assets** – none.
6. **Information Technology** – none.

7. **Equality & Human Rights** - The recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report because it is for noting only. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.
8. **Health & Safety** – none.
9. **Procurement** – none.
10. **Risk** – none.
11. **Privacy Impact** – none.

List of Background Papers - None.

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Appendix 1



COMMUNITY RESOURCES

BUSINESS REGULATION SERVICE PLAN

2015/16

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BUSINESS REGULATION SERVICE PLAN 2015/16

1. SERVICE AIMS AND OBJECTIVES

1.1 Aims and Objectives

The Food and Health & Safety Service is provided by Regulatory Services Consumer Protection, within Renfrewshire Council's Community Resources service. With the exception of feed controls, the service is delivered by the Business Regulation Team. The aim is to provide an effective regulatory service for food safety, food standards, and occupational health and safety at work on behalf of Renfrewshire Council, ensuring the Council's statutory responsibilities are met. The objective of the service is to improve the quality and effectiveness of these regulatory activities, and in doing so ensure public health and safety are maintained. The Trading Standards & Licensing Team is responsible for the enforcement of feeding stuffs legislation.

In order to achieve this aim, Community Resources will:

- Apply the relevant legislation at premises regulated by the Local Authority in line with the Scottish Regulators Code of Practice,
- Work in partnership with agencies such as Food Standards Scotland (FSS) and the Health and Safety Executive (HSE) to achieve nationally agreed strategic aims,
- Ensure that all staff undertaking enforcement activity are properly qualified and competent to undertake their duties,
- Operate a risk based approach to inspection and regulation,
- Carry out a programme of specific, targeted and appropriate interventions in order to improve food safety and health & safety standards,
- Work with local businesses in an open and transparent manner,
- Investigate and take appropriate action upon receipt of accident notifications and complaints.

1.2 Links to Corporate Objectives and Plans

The Business Regulation Service Plan 2015-16 contributes to Community Resources service outcomes as well as Renfrewshire Council's Corporate Objectives and Plans. In particular the service has a critical role to play in supporting sustainable economic development, ensuring the health and safety of the public, addressing the impact of poverty and the protection of both the public and legitimate businesses from criminal activities.

1.3 Overview

In terms of food law enforcement, Renfrewshire Council is a statutory food authority under the Food Safety Act 1990 for all food and feed businesses within Renfrewshire. The Council is also an enforcing authority in terms of Section 18 of the Health & Safety at Work etc. Act 1974, the Service is the enforcing authority for health & safety legislation in certain types of premises

within Renfrewshire. This is determined by the main activity being undertaken at the premises as laid down in the Health and Safety (Enforcing Authority) Regulations 1998.

Section 18 of the Health and Safety at Work etc Act 1974 puts a duty on the HSE and Local Authorities (LAs), as Enforcing Authorities, to make adequate arrangements for enforcement. The Section 18 Standard sets out the arrangements that LAs and HSE's Field Operation Directorate should put in place to meet this duty.

2. BACKGROUND

2.1 Organisational Structure

The Food Safety and Health & Safety service is delivered by suitably qualified officers within the Business Regulation Team operating in Consumer Protection within Regulatory Services.

Role of Regulatory Services

Regulatory Services provides Consumer Protection, and Environmental Strategy services. Consumer Protection consists of the Business Regulation and Trading Standards teams. The role of Regulatory Services is to protect the health, safety and welfare of the local community and to safeguard public health, the quality of the local environment and to enhance economic, social and environmental welfare by improving and maintaining standards of fair trading in terms of safety, quality, quantity and price.

Consumer Protection

The Service is based at:

Community Resources
Renfrewshire House
Cotton Street
Paisley
PA1 1BR

The Service can be contacted by:

email - b-serv.es@renfrewshire.gov.uk, or
phone – 0300 300 0380

Consumer Protection includes food safety, food standards, health and safety at work, and trading standards enforcement activities. The key activities of Consumer Protection are based on the implementation of inspection, survey and sampling programmes and other appropriate monitoring and investigative activities, including responding to, and learning from food complaints, accidents and incidents at work.

Consumer Protection activities are reported to two Renfrewshire Council Boards; namely Environment Policy and Regulatory Functions.

2.2 Scope of the Service

The main role of Business Regulation is to undertake regulatory functions of relevant legislation in terms of Food Safety, Food Standards and Occupational Health and Safety at Work on behalf of Renfrewshire Council. The aim is to secure compliance with the standards laid down in primary legislation, associated regulations and codes of practice. Regulatory work is complemented by the work carried out by a Health Promotion Officer.

Under Section 5 of the Food Safety Act 1990, Renfrewshire Council is a statutory Food Authority, responsible for delivery of official controls under the Act and associated Regulations. Statutory appointments of Head of Food Service and Lead Officer for Food Safety are detailed in the Council's Scheme of Delegated Functions.

Enforcement of the legislation, under Section 6 of the Food Safety Act 1990, includes food hygiene and food standards covering the safety, quality, presentation and labelling of food. To this end, a programme of food business inspections and the surveillance of food is carried out by co-ordinated food sampling and a food standards inspection programme.

Food and premises hygiene complaints are investigated. The investigation and control of food-borne infections within food premises is carried out in conjunction with NHS Greater Glasgow and Clyde. The Service acts as the originating authority to those large scale food manufacturers within the area, co-ordinating and assisting in complaints and enquiries from other Food Authorities within the UK and Europe.

As an Enforcing Authority, the Service also has responsibility for the provision of health & safety enforcement services in a range of business activities covering approximately 2600 premises and an estimated 10,000 employees. The enforcement of health & safety legislation is split between the Local Authority (Renfrewshire Council) and the HSE, depending on the main activity being undertaken at the premises as laid down in the Health & Safety (Enforcing Authority) Regulations 1998. The HSE are responsible for the more traditional "factory" or industrial premises. The premises within the remit of the Council include offices, shops, warehouses, and leisure, hotel and catering premises.

The principal activities of the service, outlined above, have relevance to the Planning, Building Standards, Civic Licensing and Alcohol Licensing services of the Council. The service also delivers official controls in relation to food safety in all Renfrewshire Council food operations.

At present there are regular imports of consignments of fish, fruit and vegetables through Glasgow Airport that are subject to controls administered by Business Regulation.

The Service provides advice and guidance to businesses to ensure compliance with statutory requirements and assists in sourcing appropriate training and educational support. The Health Promotion Officer is involved in the provision of food hygiene training for Community Resources Site Services

Catering staff. The Trading Standards & Licensing Team is responsible for enforcement of animal feeding stuffs legislation.

2.3 Demands on the Service

Table 1: Profile of food businesses in Renfrewshire as at 1 April 2015:

Premises	Number
Primary Producers	17
Manufacturers and Packers	54
Importers/Exporters	9
Distributors/Transporters	20
Supermarket/Hypermarket	32
Smaller Retailers	259
Retailers, Other	61
Restaurant/ Cafe/Canteen	282
Hotel/Guest House	24
Pub/Club	185
Take Away	183
Caring Establishment	189
School/College	84
Mobile Food Unit	77
Restaurants & Caterers, Other	154
Total	1630

Table 2: Profile of Businesses for Health & Safety Enforcement as at 1 April 2015:

Premises	Number
Retail	762
Wholesale	130
Offices	327
Catering	707
Hotels etc	23
Residential Care	19
Leisure	207
Consumer Services	416
Others	73
Total	2596

Table 3: No. of approved and registered feeding stuffs premises as at 1 April 2015:

Premises	Number
Registered Feeding Stuffs Premises	126
Approved Feeding Stuffs Premises	0
Total	126

The Food Safety and Health & Safety Services provided by Renfrewshire Council operate solely from Renfrewshire House, Cotton Street, Paisley, PA1 1BR. The Service's standard working day is 8.45am - 4.45pm Monday to Thursday, and 8.45am - 3.55pm on Friday, with an out of hour's service also being provided in cases of emergency.

The Service works in a number of complex areas, which include:

Imported Food

With Glasgow Airport in the Authority area, Business Regulation has a role to play in relation to the regular import and export of food. Where appropriate, documentary checks are carried out by Environmental Health Officers (EHOs) in liaison with UK Border Force. Regular inspections of aircraft manifests are carried out in order to monitor the activities of importers operating in our area. In addition, a monitoring regime is in place for food exported via Glasgow Airport, including both documentary and physical checks.

EHOs operate on a rota basis, with one officer allocated for each day of the working week. The officer carries out all imported food functions at the airport on his/her allocated day. In addition, on weekends and public holidays an emergency call out service is in place to deal with port health incidents.

Communication and Language

The Council area has a number of food businesses operating for whom English is not a first language. This can introduce communication challenges during the course of inspection and enforcement visits. In order to address this issue, information leaflets translated into other languages have been produced. The service has organised food hygiene training in foreign languages. A translation service is available to officers if required during inspections and other meetings.

Council Operated Food Businesses

The control of food safety in Local Authority catering operations provided by Community Resources is a complex and sensitive area of work. These premises include catering in residential establishments such as those run by the Council's Social Work Services as well as schools and nurseries.

Approved Premises

There are 10 approved premises (2 meat and fishery products, 4 meat products, and 2 cold stores) operating within Renfrewshire, all of which are approved under Regulation (EC) 853/2004.

Health & Safety Enforcement

The review of Health & Safety enforcement activities by the UK Government has influenced our approach in this area. HSE priority planning guidance directs the work of Local Authorities in relation to Health & Safety, with an emphasis on targeting resources on higher risk activities and reducing the number of routine inspections.

An Intervention Plan based on this guidance has been developed which takes into account local conditions and priorities.

2.4 Performance Management

The percentage of food businesses that meet the FSS “broadly compliant” criterion is used as a Key Performance Indicator (KPI). Analysis of the KPI for the past 5 years indicates that compliance is typically in the range 82% to 88%, which is considered acceptable given the frequency of inspection of food premises and changes that occur in the interim beyond the Council’s direct control. This figure is reported on a quarterly basis to the Environment Policy Board, with the current target set at 86%.

Elected Members receive quarterly reports on performance in key areas including Food Safety and Health & Safety enforcement and Managers provide an operational update at a monthly Regulatory Services Management Meeting. Certificates of Compliance and formal notices are reported to elected members via the Regulatory Functions Board and Information Bulletin reports.

Performance reviews are carried out on a six monthly basis with staff involved in Food Safety and Health & Safety enforcement, in order to maintain performance.

2.5 Enforcement Policy & Procedures

The Regulatory Services Integrated Enforcement Policy is in place to ensure the consistency of enforcement across all areas of Regulatory Services. The Policy sets standards clearly outlining the level of service which the public and businesses can expect to receive. It encourages fair and open regulation and commits the Service to ensuring our enforcement service works with businesses to assist them in complying with the law. The Policy has recently been reviewed to ensure it is consistent with the Scottish Regulators’ Strategic Code of Practice.

2.6 Information Systems

Premises records are held on the Authority Public Protection (APP) system, which is used to manage the inspection programme and record details of inspections, accidents, complaints and enquiries. The database is regularly reviewed and updated to facilitate the planning of inspection programmes and production of management reports.

Progress towards local, regional and national outcomes is monitored on a monthly basis using the reporting functions of the system. Statutory returns are made using data from the APP system.

3. SERVICE DELIVERY

3.1 Food, Feeding Stuffs and Health & Safety Premises Inspections

In accordance with the Food Law Code of Practice (Scotland), all food premises are risk-assessed, both for food hygiene and food standards. Risk assessments are entered in the Services database, which generates "a target inspection date". A report is generated from the database of visits due for each officer. The Service undertakes a full inspection programme based on the risk category of premises. Regulatory activity in relation to Health and Safety at Work is determined in accordance with the HSE priority planning guidance.

The tables below illustrate the number of premises in Renfrewshire in each risk category for Food Hygiene, Food Standards, Feeding Stuffs and Health & Safety as at April 2015.

Table 4: Food Hygiene Premises per Risk Category

Risk Band	Number of Premises
A	4
B	163
C	771
D	204
E	458
Unrated	14
Total	1614

In the year, there has been an increase in the number of category C and E risk rated premises with higher risk A & B risk premises remaining around the same. The spread of food premises by risk category for Renfrewshire is generally in line with the national picture.

Table 5: Food Standards Premises per Risk Category

Risk Factor Band	Number of Premises
High	7
Medium	528
Low	1077
Unrated	18
Total	1630

Table 6: Feeding Stuffs Premises per Risk Category

Risk Factor Band	Number of Premises
High	3
Upper Medium	11
Lower Medium	114
Low	197
Unrated	5
Total	330

It should be noted that premises risk ratings for feeding stuffs are currently under review. Questionnaires have been sent to relevant premises and responses will be used as the basis for initial risk rating and the programming of inspections during 2015/16.

Table 7: Profile by Health & Safety risk category rated at 1 April 2015:

Risk Category	Total number in category
A	0
B1	27
B2	38
C	1515
No Category	315
Total	2595

The tables below illustrate the number of inspections programmed for 2015/16 in each risk category for Food Hygiene, Food Standards and Feeding Stuffs.

Table 8: Food Hygiene Programmed Inspections for 2015/16

Risk Band	Number of Inspections
A	4
B	152
C	454
D	90
E	69
Unrated	14
Total	783

Table 9: Food Standards Programmed Inspections for 2015/16

Risk Band	Number of Inspections
High	4
Medium	142
Low	27
Unrated	18
Total	191

Table 10: Health & Safety Inspections for 2015/16

There are no Risk Category A premises in the health & safety programme for 2015/16. There are however, a number of themed inspections programmed as detailed in the table below:

Date	Special Intervention
April/June 2015	Planned special intervention for asbestos in small and medium businesses. Advice and guidance to be provided to local businesses through information stalls at merchants and wholesalers.
June 2015	Planned special intervention for crowd control at large scale public Events/ Sport/ Leisure Events.
June 2015	Planned special intervention for the safety related to handling of hot liquids including deep fat fryers and the carrying of hot water in food premises.
August-September 2015	Planned special Interventions in catering premises to prevent the risk of Carbon monoxide poisoning, with particular emphasis on premises where solid fuel ovens such as tandoor or wood pizza ovens are used and the ventilation and condition of equipment.
October-December 2015	Planned special intervention for Lone working in premises such as: all night garages, grocers' shops and bookmakers in an effort to reduce violence/incidents involving lone workers.

The inspection programme for 2015/16 has been developed to comply fully with the Food Law Code of Practice (Scotland) and LAC Circular 67/2 (Rev 4) Health & Safety priority planning. Therefore, in addition to the programmed Food Standards Inspections detailed above, this Authority continues to exercise the facility afforded to combine Food Standards Inspections with programmed Food Hygiene Inspections where appropriate.

So far as the inspection of premises outwith normal working hours is concerned, our policy is to ensure that, where premises are only open outwith normal hours, then appropriate provision is made for them to be visited in accordance with at least the minimum number of visits determined by their risk rating.

In addition to the inspection programmes, a number of revisit inspections, estimated for 2015/16 to be in the region of 250 visits, in accordance with the Service's Enforcement Policy, are predicted to be required.

Eight full time equivalent officers carry out the work of the Business Regulation team, including the Business Regulation Manager and Health Promotion Officer (0.5 FTE). The staffing allocation to food law enforcement is 75% of 7.5 FTE's, with the other 25% allocated to Health & Safety enforcement. Officers are allocated premises within specific geographical areas. A Trading Standards Officer, from the Trading Standards and Licensing team (0.25 FTE) undertakes functions relating to feeding stuffs.

It is considered that the Service has adequate expertise to provide a competent and full portfolio of enforcement and educational roles in relation to Food Safety and Health & Safety. However, where necessary we are able to draw on expertise from the Food Standards Scotland, Glasgow Scientific Services – the Public Analyst, Health Protection Scotland, the Director of Public Health, Animal and Plant Health Authority (APHA) and other local authorities.

3.2 Food, Feeding Stuffs and Health & Safety Service Requests

The Service has documented policies relating to the investigation and handling of complaints and service requests which ensure that all complaints are investigated in accordance with the appropriate Code of Practice. The numbers of complaints and service requests, detailed by category, received during the last year (April 2014 - March 2015) are shown in the table below:

Table 11: Complaints and Service Requests 2014/15

Category of Complaint/Service Request	Number of enquiries 2014/15
Food Hygiene	88
Food Standards	27
Hygiene of Food Premises	110
Feeding Stuffs (animals)	4

Category of Complaint/Service Request	Number of enquiries 2014/15
Health & Safety	141
Advice to Business	215
Advice to Consumers	50
Total	631

Complaints and Service Requests are dealt with by the officer responsible for the premises within specific geographical areas which are the subject of the complaint, or from which the product was sold. All service requests are logged in the APP database against the premises implicated, with visits and actions being recorded when undertaken.

All complaints are recorded and their risk evaluated to distinguish between those which require an on-site investigation and others which may be resolved by telephone or written advice.

3.3 Investigation of Accidents

A procedure is in place for the investigation of notified accidents designed to ensure consistency and quality of the accident investigation service. It is not possible or appropriate to investigate all incidents and a systematic approach has been adopted to ensure that the more serious incidents are investigated.

3.4 Enforcement Management Model (EMM)

The Guidance in the LAC22/18 along with detailed guidance that was issued for use by EHOs is used to promote consistency of enforcement between individual officers, LAs and with HSE.

All officers in the team have been trained in the use of the Enforcement Management Model. The model is used by officers when considering the most appropriate action to take in more complex situations which are occasionally encountered, including serious accident investigations. It is also used as a monitoring tool by the Business Regulation Manager/Consumer Protection Manager.

3.5 Home Authority Principle & Primary Authority Scheme

The home authority principle is applied when dealing with food complaint investigations and also routinely in relation to food standards and labelling issues. It is considered to be an aid to good enforcement practice.

The Council has no formal agreements in place to act as a Home Authority with any specific business, but has listed the following significant establishments as ones which are considered as home authority premises:-

Premises Name	Premises Address
Chivas Brothers	Renfrew Road, Paisley, PA 4DY
Craigton Packaging	43 Scotts Road, Paisley, PA2 7AN
G Porrelli & Co. Ltd	25 Lacy Street, Paisley, PA1 1QN
Houston Brewing Company	South Street, Houston, PA56 7EN
Filshill Cash and Carry	201 Ainslie Avenue, Hillington, Glasgow, G52 4HE
James MacDowall and Sons	191 George Street, Paisley, PA1 2UN
John Scott Meat (Paisley)Ltd	Sandyford Road, Paisley, PA3 4HP
Loganair Ltd	2 St Andrew's Crescent, Glasgow Airport, Paisley, Renfrewshire, PA3 2TQ
McAusland Crawford	79/81 Abercorn Street, Paisley, PA3 4AS
Spicemanns Limited	13 Kelvin Avenue, Hillington, G52 MLR
Davidson Wholesale Butchers Ltd,	Unit 1 Mossedge Industrial Estate, Linwood, PA3 3HR
Tom Hannah Agencies Ltd	Walkinshaw Street, Johnstone, PA AB
WM Bosomworth & Sons Ltd	Sandyford Abattoir, Paisley, PA3 4HP
Kismet (Scotland) Ltd	Unit D, 1 Lyon Road, Linwood, PA3 3BQ
Earl Haig Foods Ltd	15/17 Earl Haig Road, Hillington, G52
Ingram Brothers	15 East Lane, Paisley, PA1 1QA

In addition the Council is the originating authority for the following businesses:

- Aulds (Foods) Ltd, Barnsford Road, Inchinnan
- Diageo Global Supply Scotland, 500 Renfrew Road, Glasgow

For companies operating under two or more local council jurisdictions, Primary Authority provides reliable and consistent regulatory advice from a single source when dealing with key aspects of environmental health, trading standards, health & safety, and licensing services. Renfrewshire Council currently operates a Primary Authority partnership with M&Co in relation to Health & Safety advice and enforcement.

3.6 Advice to Business

Consumer Protection undertakes an on-going advisory role to all businesses in Renfrewshire. A range of information and promotional material is made available for businesses by Environmental Health Officers and Health Promotion Officers during visits. Similarly, training opportunities and other information is provided to businesses during visits. The Trading Standards Service provides advice on feeding stuffs to any business requesting it.

3.7 Health Promotion Activities

Health Promotion activities are undertaken through an integrated approach throughout Regulatory Services, co-ordinated by a designated Health Promotion Officer. Through this integrated approach, the Service assists in signposting training opportunities, providing relevant information and advice to businesses in Renfrewshire. A selection of FSS and HSE publications in English and minority languages, and Information packs for new businesses are available. A leaflet summarising our Integrated Enforcement Policy is available for businesses. A communications calendar has been devised which will direct the majority of work in relation to Health Promotion activities in 2015/16. The activities will be communicated via the Council website and also social networking sites and press releases.

3.8 FHIS & EatSafe

The Food Hygiene Information Scheme continues to be a success in Renfrewshire with around 1000 food premises who sell food to the public being included.

Currently 98% of premises within Renfrewshire have a pass certificate within the scheme.

There are currently 11 premises that have Eat Safe Awards. These are:

Premises Name	Premises Address
BP Connect & Wild Bean Cafe	White Cart Road, Paisley, PA3 2TH
Kibble Education & Care Centre	Goudie Street, Paisley, PA3 2LG
Kibble Works	55 Clark street, Paisley, PA3 1RB
Capability Scotland	Wallace Court, 191 Main Road, Elderslie, PA5 9EJ
Erskine mains Care Home	Meadow drive, Erskine, PA8 7ED
Hanover(Scotland) Housing Association, Orchard Court	Orchard Street, Renfrew, PA4 8RZ
Hanover(Scotland) Housing Association Newton Court	23 Maree Road, Paisley, PA2 9DH
Hanover(Scotland) Housing Association, Ailsa Court	1 Ailsa Drive, Paisley, PA2 8HE
Hanover(Scotland) Housing Association, Walikinshaw Court	Walkinshaw street, Johnstone, PA5 8AF
Capability Scotland, Corseford school	Howwood Road, Kilbarchan, PA10 2NT
Little Inch Care Home	8 Rashilee Avenue, Erskine, PA8 6HA

All inspection reports are now published on the Council website, enabling consumers to make an informed choice about where they wish to purchase food.

3.9 Sampling

Research has been carried out by the Improvement Service to consider options for the creation of shared service to deliver Scientific Services in Scotland. It is understood that the draft business case indicates savings may be achievable in year one with further savings in future years. It is anticipated that these savings may increase as service reform is implemented, such as the development of laboratories as centres of excellence. A full detailed business case will be completed and when available a report will be prepared for the Environment Policy Board.

Currently, Renfrewshire Council, along with 9 other local authorities have a Service Level Agreement with Glasgow City Council for the provision of analytical services. The analyst service is provided by Glasgow Scientific Services, Colston Laboratory, 64 Everard Drive, Glasgow G21 1XG. Glasgow Scientific Services are this Authority's appointed Public Analyst for chemical analyses of all food samples, Food Examiner for all microbiological examinations of food samples and Agricultural Analyst for all feeding stuffs samples taken.

The sampling programme for 2015/16 is attached as Appendix 1 to this Service Plan. The programme will focus on high risk premises in Renfrewshire, whilst reflecting any local or national priorities such as West of Scotland Food Liaison Group surveys.

Food sampling will also be undertaken at Glasgow International Airport to monitor the quality, composition and labelling of foods imported through the airport as part of the Service's imported food controls. It is not possible to estimate sample numbers or types for this sampling at present.

The Trading Standards Service undertakes risk-based sampling based on intelligence received, and local or national priorities.

3.10 Control and Investigation of Outbreaks and Food Related Infectious Diseases

Community Resources works closely with NHS Greater Glasgow and Clyde Health Board Consultants in Public Health Medicine in outbreak control situations and the routine investigation of infectious disease. In addition the Health Board has produced an outbreak control plan for dealing with major outbreaks of food related illness to which this authority has had a major input.

The Business Regulation Team work in partnership with the Public Health Unit at NHS Greater Glasgow and Clyde Health Board to ensure the plan is adhered to. In addition, an outbreak control and investigation of notifications of food borne disease procedure is in place.

During 2014/15 there were 4 cases of food poisoning reported and investigated by Environmental Health Officers.

Present resources within Community Resources are adequate to meet current levels of notification; however in the event of a major outbreak, any required

additional resources would be made available by seconding Environmental Health Officers from other service areas.

3.11 Food & Feed Safety Incidents

Food and Feed safety incidents are dealt with in accordance with the relevant codes of practice the Food Law Code of Practice (Scotland) and the Feed Law Enforcement Code of Practice (Great Britain). Notifications of incidents are received from Food Standards Scotland (FSS) by e-mail, telephone, fax, or all three. In case of emergencies, an officer is on stand-by who has contact details for all relevant members of staff. Procedures for food and feed safety incidents are in place and are available to all staff. This allows for alerts to be appropriately actioned, investigations set in motion and warnings issued if necessary. Any enforcement activity which is required in support of an incident is carried out within the terms of the relevant legislation and the Council's enforcement policy for assuring the safety of food and feed.

In addition to responding to notified incidents, Renfrewshire Council will, where necessary initiate Food/Feed Alerts in accordance with Code of Practice Guidance and will liaise with Food Standards Scotland in such situations.

3.12 Liaison with Other Organisations

To ensure enforcement and other activities carried out by the Service are consistent with neighbouring Authorities and to ensure best practice, Renfrewshire Council actively participates in the West of Scotland Food and Health & Safety Liaison Groups. The groups meet regularly throughout the year and comprise representatives from the 14 authorities, which previously made up Strathclyde Regional Council, together with representatives from Glasgow Scientific Services, and where appropriate, Food Standards Scotland and the Health & Safety Executive. The groups are attended by the Business Regulation Manager or a suitable deputy.

The Service also has formal and informal links to a range of other organisations and agencies. These Include:-

NHS Greater Glasgow and Clyde Health Board
Association of Port Health Authorities
Royal Environmental Health Institute for Scotland
Society of Chief Officers of Environmental Health in Scotland
Society of Chief Officers of Trading Standards in Scotland
Scottish Food Enforcement Liaison Committee
Health Protection Scotland
Food Standards Scotland
Health & Safety Executive
Glasgow Scientific Services
Animal and Plant Health Agency
West of Scotland Quality Working Group (Feeding Stuffs)
H.M. Revenue and Customs
Scottish Government Rural Payments and Inspection Directorate (SGRPID)
Civica APP Scottish Users Group

4. RESOURCES

4.1 Financial Allocation

The budget detailed below indicates the level of resources available 2015-16 to deliver the necessary services. As highlighted at 3.1 above the resource allocation within the Business Regulation Team is 75% of Food Law enforcement and 25% on Health & Safety enforcement. In addition, the figure for employee costs includes 0.25 of a Trading Standards Officer post for the delivery of Feed Controls.

Budget	2015-16
Employee Costs	£343,890
Supplies and Services	£180,701
Travel and Subsistence	£9,430
Training	£1,600
Total	£535,621

Projected Income Source	2015-16
Export Certificates	£9,500
Sales, Fees and Charges	£500
Total	£10,000

4.2 Staffing Allocation

Within the context of this plan, the allocation of staff is designed to provide an effective enforcement service for food safety, food standards, trading standards and occupational health and safety at work on behalf of Renfrewshire Council.

All food enforcement officers are authorised in accordance with the Food Law Code of Practice (Scotland) commensurate with their training and experience. A range of additional relevant qualifications is held including the REHIS Advanced Food Hygiene Diploma, the REHIS Certificate in the Inspection of Meat and Other Foods and the RIPHH Certificate in HACCP Principles. Three officers have completed the ISO 9000 Lead Assessors course.

The Service secures administrative support from a pool of administrative and support staff in the Council's Business Support Service.

4.3 Employee Development Plan

The Service is committed to ensuring all officers are suitably qualified, trained and remain competent in terms of the Food Law Code of Practice (Scotland) and in terms of Section 18 of the Health & Safety at Work Act 1974.

This is facilitated by the provision of in-house training, and all employees have the opportunity on a rotation basis to attend relevant external training events. These include the Food Update, Health & Safety Update, the Law Enforcement course and other courses arranged ad-hoc by organisations such as REHIS, ABC Food Safety, Food Standards Agency and Health & Safety Executive covering changes in legislation. Any employee attending such a course is required to “cascade” the relevant information accrued as a result of their attendance to other food officers.

Business Regulation Team meetings are held monthly, where performance, food safety and food standards enforcement and Health & Safety enforcement issues are discussed. Matters arising from the quality assessment model for inspections, consistency issues and interpretation issues are discussed. Team meeting minutes and Liaison Group minutes are stored in the staff manual for all officers to use. Relevant points from the Liaison Groups are also discussed at Team meetings.

In addition, all staff have full access to, and are trained in the application of, policies and procedures, which are a requirement of the framework agreement on local authority food law enforcement. Training records are maintained for each officer.

A Corporate Training Plan (Managing Team and Individual Performance Development - MTIPD) has been rolled out. All officers have completed their training needs analysis and have individual development plans prepared for 2015/16.

5. QUALITY ASSESSMENT

5.1 Quality Assessment

The Service has a documented “Internal Monitoring Procedure – Internal Checks” quality assessment model for inspections. The Business Regulation Manager has primary responsibility for carrying out quality assessments on the Service. The Consumer Protection Manager has a secondary responsibility to oversee the performance of the Business Regulation Manager and to ensure that quality assessments are being carried out consistently throughout the Service.

The Internal checks include file checks, one-to-one discussions, team discussions and accompanied inspections. Records of these are retained by the Business Regulation Manager and Consumer Protection Manager.

This quality assessment model facilitates the Service’s requirement in accordance with annex 2 of the Food Law Code of Practice (Scotland) and the Section 18 guidance issued by the HSE to ensure that all staff engaged in enforcement activities retain their competence.

The Business Regulation Manager reviews a monthly report on the performance indicators to ensure that the targets are met. The monthly report also details performance information relating to inspection deadlines, complaints and service requests received and food sampling activity.

6. REVIEW

6.1 Review Against 2014/15 Inspection and Sampling Programmes

The following table details performance against targets for 2014/15

Programmed Food Hygiene Inspections		
Activity	Targets for 2014/15	Achieved
Category A (6 months)	9	9 (100%)
Category B (12 months)	159	158 (99%)
Category C (18 months)	455	451 (99%)
Category D (2 years)	124	116 (93%)
Category E (Alt. Enforcement /3 Years)	138	135 (98%)
Total	885	864 (98%)
Programmed Food Standards Inspections		
Activity	Targets for 2014/15	Achieved
High Risk (1 year)	5	4 (80%)
Medium Risk (2 years)	140	132 (94%)
Low Risk (5 years)	23	17 (74%)
Total	168	153 (91%)
Complaints/Enquiries/Requests for Service received 2014/15		999
Total Number of Health & Safety Inspections/Visits 2014/15		155

Programmed Food Hygiene Inspections: Performance remains high in this area as 98% of visits due took place within the required timescales. One Category B food hygiene inspection was reported as being missed. The business was in fact closed but the database had not been updated due to an administrative error. One high risk food standards inspection was reported as being missed. This was a manufacturer who was working between two sites and officers initially had difficulty in gaining access to the premises. The Service continues to aim for 100% performance with a high degree of awareness among officers of the importance of maintaining the inspection programme and its associated performance targets.

Programmed Food Standards Inspections: One (of 5) programmed Food Standards inspection scheduled for a high risk premises was not undertaken – officers were unable to gain access on a number of occasions, resulting in an relatively low percentage figure of 80%.

Alternative Enforcement: During the year, an Alternative Intervention Strategy was implemented in relation to low risk premises such as pharmacies and similar premises with minimal food elements to their operation. This allows Officers the flexibility to concentrate on those visits which are highest risk.

Complaints/Enquiries/Requests for Service: There continues to be an increase in the number of complaints and requests for service, however this is largely attributed to improved recording procedures.

Sampling: The Food Sampling programme for 2014/15 continued the risk based approach to sampling. A number of projects were undertaken successfully, and follow-up action and surveillance based on results will be carried over into 2015/16. Priorities for 2014/15 were influenced by the Horsemeat incident of 2013. A sampling exercise focussing on the issue of substitution was undertaken. Results are shown in the following table;

Sample Type	Type of Premises	No. planned	No. taken	Pass	Fail
Speciation of Fish and Fish Products.	Schools and Hospitals.	10	8	8	0
Microbiological examination of deserts from catering premises	Catering premises	10	0	N/a	N/a
Lamb Authenticity	Indian restaurants and takeaways	15	15	13	2**
Sampling of colours in Indian meals	Indian restaurants and takeaways	15	15	14	1
Speciation in Butchery products	Retail butchers, manufacturers, supermarket in store bakeries	25	13	13	0
Microbiological examination of cooked meats	Butcher shops in local area supplying raw and cooked meats	10	28	16	12*
Private Water Supplies	Sample all commercial Private Water Supplies	5	5	4	1
Alcohol sampling	Public Houses Combined with TS.	15	1	1	0
Colours/salt content of in-store produced bread and confectionery	Bakers and bakery premises	10	6	6	0

*The cooked meat samples noted as fails were reported by GSS as 'borderline' fails for total counts. Follow up visits are made to investigate potential causes of failures and appropriate action, including resampling is undertaken.

** These two failed samples resulted in reports being submitted to the Procurator Fiscal in terms of offences under the Food Safety Act 1990.

The Food Sampling programme is evaluated at the end of each year in order to determine priorities for the next year as part of the Service Planning process or in response to any changes in advice/instruction given by Food

Standards Scotland or other relevant government bodies. The programme for 2015/16 is based on local priorities, the national programme in agreement with SFELC and the West of Scotland Food Liaison Group. (See Appendix 1).

Training: Following a review in 2014, an area for improvement was identified in relation to officer attendance at relevant training. Efforts were made to deliver in-house CPD training. Examples include a training session at a team meeting delivered by team members who attended an external training event on Remedial Action Notices and an in-house event for EHOs to cascade information on Ebola. 2 officers successfully completed the ISO 9000 Lead Assessors course.

6.2 Areas for Improvement

Consideration requires to be given to an electronic file management system as well as pursuing options to introduce mobile technology to improve efficiency.

Further development of the APP electronic database will be pursued during 2015/16, including the introduction of live management reports being prepared automatically each month to allow continual performance review.

Appendix 1



COMMUNITY RESOURCES

BUSINESS REGULATION

FOOD SAMPLING PROGRAMME

2015/16

1. INTRODUCTION

The annual sampling programme for 2015-16 is designed to fulfil aims and objectives in line with Community Resources' Food Sampling Policy. The programme outlines the sampling priorities for the year, however it is recognised that circumstances and priorities may change, which require the programme to be flexible in order to respond to these changing circumstances.

The majority of samples are taken informally for the purpose of monitoring, surveillance and information gathering; however formal samples will be taken where enforcement action is anticipated. Environmental Health Officers, Food Safety Officers and other authorised officers are responsible for undertaking the food sampling functions of the Council.

At present there is a Service Level Agreement in place with Glasgow City Council to provide analytical services to Renfrewshire Council. The analyst is: Glasgow Scientific Services, Colston Laboratory, 64 Everard Drive, Glasgow, G21 1XG.

2. APPROACH TO SAMPLING

Renfrewshire Council complies with the requirements of the Food Safety (Sampling and Qualifications) Regulations 1990 and the Food Standards Agency's Code of Practice. The sampling programme for 2015/16 is designed to be more focused on high risk products which are manufactured in Renfrewshire. Focussing on these premises will ensure that the premises which pose the greatest risk to the public of Renfrewshire are adequately controlled.

2.1 Informal Samples

An informal sample may be taken covertly, however, the food business operator will always be informed of the results of the sample. Informal samples can be useful in allowing an unrecognised officer to witness activities in business premises in a real time situation; however for enforcement purposes formal sampling must be undertaken.

2.2 Formal Samples

In accordance with Regulatory Services Enforcement Policy, which promotes action which is consistent, fair and proportionate, formal samples will generally be taken after routine samples have been found to fail statutory requirements and no satisfactory remedial action has been taken.

2.3 Sampling Priorities

The following areas have been highlighted as important priority areas which should be targeted in the coming year to ensure Renfrewshire meets its statutory obligations in relation to food sampling:

2.4 Manufacturing/Approved Premises

Renfrewshire Council will continue to concentrate on sampling from manufacturers and approved premises in our area. These premises will be sampled at least annually. Where possible, samples will be taken in advance of Food Hygiene/Food Standards inspections in order to discuss sample results with the food business operator.

2.5 Sampling Plan 2015/16

The sampling plan for 2015/16 outlines the project work to be undertaken by Renfrewshire Council in high risk areas. The sampling plan is outlined at point 4.2.

3. COMPLAINTS & FOOD BORNE DISEASE INVESTIGATIONS

In response to complaints and notifications of food borne disease received Community Resources may opt to take samples in order to resolve any issues arising as a result of any investigations.

3.1 Co-ordinated Sampling

Where appropriate the Service will participate in food surveillance programmes arranged by regional and national bodies such as Food Standards Scotland, SFELC and the West of Scotland Food Liaison Group.

3.2 Imported Food

In order to monitor the quality, composition and labelling of imported foods, samples of foods imported through Glasgow Airport will be submitted to the Public analyst for examination.

3.4 Special Investigations

There may be circumstances whereby an incident will require special investigation and resources may have to be directed towards dealing with the investigation. In addition this may involve liaison with other partners including Health Protection Scotland and Greater Glasgow & Clyde Health Board.

4. SAMPLING PLAN

4.1 Priority Actions

The following topics have been identified as priority actions by SFELC and will be subject of sampling activity during 2015/16, along with other local surveillance activities outlined in the table below at point 4.2:

1. Histamine levels in cheese.

Following incidents of high levels of histamine found in cheese samples in Scotland, coupled with the lack of legislation in the area, surveillance is being carried out in order to gain further knowledge on baseline levels. This work would inform an appropriate standard which could be applied for enforcement purposes.

2. Microbiological quality of imported foods

Data indicates that *Listeria monocytogenes* was identified in a number of samples of food from a variety of countries. Focussed sampling of ready to eat imported (EU and third country) foods, including *Listeria* examination, will allow any trends to be investigated.

3. Microbiological quality of herbs and spices used by caterers

Examination of data on UKFSS shows a continuing issue with the microbiological quality of some samples of herbs and spices, however, there is limited data available for these types of products. Sampling will be targeted at catering premises.

4. Meat substitution and use of additives by caterers

Meat substitution and use of colours were sampling priorities for our 2014/15 sampling plans. It is apparent that failures continue to be identified and targeting should continue. It is apparent that sampling for monosodium glutamate has reduced in recent years. SFELC previously organised surveys examining MSG use and issued guidance for the trade. Increased sampling would allow compliance, and any need for further engagement with the trade, to be assessed. These samples will be primarily focused on meat substitution but to utilise sampling, analysis for colours and MSG will be carried out where possible.

4.2 Sampling Plan

Time of Year	Sample Type	Type of Premises	No. of samples
July 2015	Histamine levels in Cheese	Delicatessen, Retail, Catering	10
April 2015 to March 2016	Meat substitution and use of additives by caterers	Catering premises	10
July/August 2015	Fat content of minced meat	Retail/Butchers	15
April 2015 to March 2016	Microbiological quality of imported foods	Retail/Airport	15
April 2015 to March 2016	Microbiological quality of herbs and spices used by caterers	Catering premises	10
April 2015 to March 2016	Private Water Supplies	Sample all commercial Private Water Supplies	5
November 2015	Alcohol sampling to determine substitution/short measures.	Public Houses Combined with TS.	10
June to September 2015	Gluten Free Bakery Goods	Manufacturing bakers/Retail	5
June to September 2015	Microbiological quality of cooked meats from Supermarkets, Deli's, Butchers	Supermarket, Deli, Butchers	10
July/August 2015	Microbiological quality of soft ice cream.	Retail/Street traders	5

4.3 Routine Sampling

The project sampling initiatives listed above will be the focus of sampling activities, however in the course of routine work officers will take samples as appropriate.

5. REVIEW OF 2014/15

The Food Sampling programme for 2014/15 continued the risk based approach to sampling. A number of projects were undertaken successfully, and follow-up action and surveillance based on results will be carried over into 2015/16.

The Food Sampling programme will be evaluated at the end of each year in order to determine priorities for the next year as part of the Service Planning process or in response to any changes in advice/instruction given by the Food Standards Scotland or other relevant government bodies.

5.1 Highlights from 2014/15 and Emerging Issues 2015/16

Food Crime

An emerging area of work for the Business Regulation Team is assisting partner agencies in prevention of food crime.

The team are working closely with FSAS, Police Scotland, HMRC and other partners in work within this area.