
To: Infrastructure, Land and Environment Policy Board

On: 29 August 2018

Report by: Director of Communities, Housing and Planning Services

Heading: Business Regulation Service Plan 2018/19

1. SUMMARY

- 1.1 Renfrewshire Council is required by Food Standards Scotland to produce a Business Regulation Service Plan each year to detail the work currently planned and being undertaken to enforce Food Law and Food Safety across Renfrewshire during that year.
 - 1.2 The team that covers this for Renfrewshire Council, the Business Regulation Team within Communities & Public Protection, also leads on other areas of work including workplace health and safety and these are included within the plan to provide a comprehensive description of the services provided by the team.
 - 1.3 The Business Regulation Service Plan 2018/19 sets out the objectives, the work being undertaken, methods of service delivery, allocated resources and quality assurance framework for the Business Regulation Team for the period from 1 April 2018 to 31 March 2019. It is based on a programme of inspections and reviews that is developed and carried out each year in accordance with the priorities and standards set by relevant bodies including Food Standards Scotland.
 - 1.4 The Business Regulation Service Plan for the 2018/19 year is attached to this report as an appendix.
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2. RECOMMENDATIONS

- 2.1 It is recommended that the Infrastructure, Land and Environment Policy Board approves the Business Regulation Service Plan 2018/19 for submission to Food Standards Scotland.
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3. BACKGROUND

- 3.1 Business Regulation forms part of the Communities & Public Protection Service within Communities, Housing and Planning Services. The team provides 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 in these areas 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 is maintained.
- 3.2 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. This means that the Service is the enforcing authority for health & safety legislation in certain types of premises within Renfrewshire, determined by the main activity being undertaken at the premises as laid down in the Health and Safety (Enforcing Authority) Regulations 1998.
- 3.3 Section 18 of the Health and Safety at Work etc Act 1974 puts a duty on the Health and Safety Executive (HSE) and Local Authorities, as Enforcing Authorities, to make adequate arrangements for enforcement. The Section 18 Standard sets out the arrangements that should be put in place to meet this duty.
- 3.4 The Business Regulation Service Plan 2018/19 highlights the work undertaken by the Business Regulation Team, the current position with regards to premises (as of 1 April 2018) and the planned and programmed work throughout the year.
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Implications of the Report

1. **Financial** – None
2. **HR & Organisational Development** – None

3. Community Planning –

Renfrewshire is safe – By implementing the attached Service Plan, Communities & Public Protection will ensure that food that is prepared and consumed in Renfrewshire is safe and that workplace Health & Safety is regulated.

4. Legal - None

5. Property/Assets - None

6. Information Technology - None

7. Equality & Human Rights

- (a) 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. 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

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9. Procurement – None

10. Risk – None

11. Privacy Impact – None

12. Cosla Policy Position – None

List of Background Papers

None

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Communities, Housing and Planning Services

BUSINESS REGULATION SERVICE PLAN

2018/19

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BUSINESS REGULATION SERVICE PLAN 2018/19

1. SERVICE AIMS AND OBJECTIVES

1.1 Aims and Objectives

The Food and Health & Safety Service is provided by Communities & Public Protection, within Renfrewshire Council's Communities, Housing and Planning 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 to ensure public health and safety is maintained. The Trading Standards & Licensing Team is responsible for the enforcement of feeding stuffs legislation.

In order to achieve this aim, Communities, Housing and Planning Services 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, service requests, food poisoning notifications and complaints.

1.2 Links to Corporate Objectives and Plans

The Business Regulation Service Plan 2018/19 contributes to Communities, Housing and Planning Services 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, as Enforcing Authorities, to make adequate arrangements for enforcement. The Section 18 Standard sets out the arrangements that Local Authorities 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 Communities & Public Protection within Communities, Housing and Planning Services

2.1.1 Role of Communities & Public Protection

Communities & Public Protection includes the Business Regulation, Community Safety, Environmental Improvements and Trading Standards teams. Their combined role 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.

2.1.2 Communities & Public Protection

The Service is based at:

Communities, Housing and Planning Services
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

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. The key activities of Business Regulation 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.

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 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 Health & Safety Executive (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, 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.

The Service provides advice and guidance to all businesses to ensure compliance with statutory requirements and assists in sourcing appropriate training and educational support. The Health Promotion Officer is also involved in the provision of food hygiene training for Environment & Infrastructure Facilities Management Soft Services.

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 2018:

Premises	Number
Primary Producers	20
Manufacturers and Packers	81
Importers/Exporters	11
Distributors/Transporters	27
Supermarket/Hypermarket	35
Smaller Retailers	297
Retailers, Other	65
Restaurant/ Cafe/Canteen	338
Hotel/Guest House	25
Pub/Club	188
Take Away	215
Caring Establishment	234
School/College	88
Mobile Food Unit	99
Restaurants & Caterers, Other	192
Total	1379

Table 2: Profile of Businesses for Health & Safety Enforcement as at 1 April 2018:

Premises	Number
Retail	781
Wholesale	130
Offices	326
Catering	759
Hotels etc	24
Residential Care	20
Leisure	208
Consumer Services	434
Others	72
Total	2685

Table 3: No. of approved and registered feeding stuffs premises as at 1 April 2017:

Premises	Number
Registered Feeding Stuffs Premises	128
Approved Feeding Stuffs Premises	0
Total	128

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:

Glasgow International Airport

As Glasgow International Airport lies within the Local Authority area, this adds further elements of work to the Business Regulation Team. At present there are regular imports of consignments of fish, fruit and vegetables through Glasgow Airport. These foods are subject to controls administered by Business Regulation. The Service is also involved in the surveillance of exports from the Airport and provides export certificates to those businesses exporting foodstuffs from Renfrewshire.

The Business Regulation Team provides a port health role at the airport. Renfrewshire Port Health Authority was originally set up with the primary objective of preventing dangerous epidemic diseases entering the country. Although this can still occur, if a person is patently unwell, this function is now more realistically aimed at contacting and monitoring persons who may be carrying a communicable disease and preventing further cases arising from environmental contamination of aircraft.

There are currently 2 businesses which operate flight catering within the airport estate and these are also subject to inspection by the service.

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 and a translation service is available to officers if required during inspections and other meetings.

Council Operated Food Businesses

The control of food enforcement in Local Authority catering operations provided by Environment & Infrastructure Services is a complex and sensitive area of work. These premises include catering in residential establishments such as those run by the Council and Health and Social Care Partnership Social Work Services as well as schools and nurseries. The service employs the same approach to enforcement in these premises as in other similar businesses.

Approved Premises

There are 10 approved premises (2 meat and fishery products, 6 meat products, and 2 meat, fish & dairy products) operating within Renfrewshire, all of which are approved under Regulation (EC) 853/2004.

Events

A significant number of 1-day events such as The British Pipe Band Championships, fetes, agricultural shows, food festivals and markets are held throughout Renfrewshire on an annual basis, particularly, but not exclusively, during the summer months. These events require a food law enforcement presence in response to the level of external food retailers and caterers providing food for the large number of visitors and this can result in a minor short-term impact on the food service. The events do however; provide an

opportunity for health promotion activities, which the team conduct throughout the year.

Health & Safety Enforcement

The review of Health & Safety enforcement activities by the UK Government has influenced the 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 who receive a “pass” in terms of the food hygiene information scheme is used as the Indicator for performance. This figure is reported on a quarterly basis to the Infrastructure, Land and Environment Policy Board, with the current target set at **97%**.

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 bi-monthly Communities & Public Protection 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 Communities & Public Protection. 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 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 1 April 2018.

Table 4: Food Hygiene Premises per Risk Category

Risk Band	Number of Premises
A	13
B	219
C	298
D	208
E	78
Unrated	22
Total	838

The risk rating of a food business is based on a number of elements. Hygiene, structure and food safety management are assessed to determine the risk posed by an establishment and the frequency of intervention by the local authority. These are numerically scored and used to derive the rating that is presented to the consumer as the 'score', A-E; Category A posing the highest risk.

In the year, there has been an increase in the number of category A rated premises, (previously 12). In addition, there has been a slight shift upwards in category B, C & D premises. From discussions with officers, it is evident that there has been a fall in both structural and general standards within food businesses. The exact cause of this has still to be determined but businesses

are less prepared to invest money in their premises. Business Regulation will continue to monitor this.

Table 5: Food Standards Premises per Risk Category

Risk Factor Band	Number of Premises
High	5
Medium	487
Low	1007
Unrated	12
Total	1511

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

Table 7: Profile by Health & Safety risk category rated at 1 April 2018:

Risk Category	Total number in category
A	1
B1	33
B2	764
C	1565
Unrated	465
Total	2828

The tables below illustrate the number of inspections programmed for 2018/19 in each risk category for Food Hygiene, Food Standards and Feeding Stuffs.

Table 8: Food Hygiene Programmed Inspections for 2018/19

Risk Band	Number of Inspections
A	13
B	219
C	298
D	208
E	78
Unrated	22
Total	838

Table 9: Food Standards Programmed Inspections for 2018/19

Risk Band	Number of Inspections
High	5
Medium	134
Low	1
Unrated	12
Total	152

Table 10: Health & Safety Inspections for 2018/19

Since 2013, the service has refined the intervention strategy for businesses by further improving the targeting of relevant and effective interventions in line with LAC 67. The refinement preserves inspections for higher risk premises and has led to a reduced number of proactive Health & Safety inspections. This has subsequently allowed capacity for more effective outcome focussed interventions whilst protecting people in the workplace and wider society. There are two proactive inspection (Risk Category A premises) in the health & safety programme for 2017/18 and the themed inspections programmed are detailed in the table below:

Date	Special Intervention
August-December 2018	Carry out special interventions at animal visitor attractions in an effort to reduce the risk of contamination especially to children.
August-December 2018	Carry out special interventions for safety in swimming pools and spas where Health & Safety is enforced by the Local Authority to reduce the risk to employees and the public from Health & Safety and Public Health incidents.
August-December 2018	Carry out special interventions at commercial catering establishments to assess gas safety and where the risk of carbon monoxide may be present.
August-December 2018	Carry out special interventions at premises, especially licensed premises that use stored gas to minimise the risk of explosion.
August-December 2018	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.
August-December 2018	Proactive inspection of industrial retail/wholesale premises to ensure adequate control of work at height, work place transport and loading and unloading of vehicles.
August-December 2018	Carry out special interventions in relation to Crowd management at large scale events.

The inspection programme for 2018/19 has been developed to comply fully with the Food Law Code of Practice (Scotland) and LAC Circular 67/2 (Rev 7) Health & Safety priority planning.

From April 1 2018, Renfrewshire Council have formally taken part in the Food Standards Scotland (Annex 5) pilot. Therefore, in addition to the programmed Food Standards Inspections detailed above, the Service will continue to exercise the previous facility afforded to combine Food Standards Inspections with programmed Food Hygiene Inspections.

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 2018/19 to be in the region of 300 visits, are predicted to be required, in accordance with the Service's Enforcement Policy.

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 Food Standards Scotland, Glasgow Scientific Services – the Public Analyst, Health Protection Scotland, the Director of Public Health, Animal and Plant Health Authority (APHA), The Health & Safety Executive 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 2017 - March 2018) are shown in the table below:

Table 11: Complaints and Service Requests 2017/18

Category of Complaint/Service Request	Number of enquiries 2017/18
Food Hygiene	79
Food Standards	43
Hygiene of Food Premises	31
Feeding Stuffs (animals)	0
Health & Safety	7
Advice to Business	119
Advice to Consumers	25
Certificates and Consultations	819
Imports/Exports	17
Other	1
Total	1141

*Figure includes accident and asbestos notifications.

Complaints and Service Requests are dealt either by the duty Business Regulation Officer or by the officer responsible for the premises which are the subject of the complaint/request. 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 the 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, Local Authorities 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 / Regulatory and Enforcement Manager.

3.5 Home Authority Principle & Primary Authority Scheme

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 has no partnerships in relation to health & safety advice and enforcement.

The Regulatory Reform (Scotland) Act 2014 creates a legal framework for implementation of Primary Authority arrangements relating to the devolved regulatory responsibilities of Local Authorities in Scotland. A process to introduce the scheme for food businesses is currently going through the consultation process.

The Primary/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/originating authority premises:-

A&A Bakers	Moss Road	Linwood	PA3 3HR
Alice Cairns Butchers Ltd	Moss Road	Linwood	PA3 3HR
Alpha LSG Sky Chef's Ltd	Arran Avenue	Paisley	PA3 2AY
Alpha LSG Sky Chef's Ltd	Arran Avenue	Paisley	PA3 2AY
Aulds Delicious Desserts	Barnsford Avenue	Inchinnan	PA4 9RG
Big Bear Bakery	15 Edison Street	Hillington Park	G52 4JW
Buon Giorno	11A Queen Street	Renfrew	PA4 8TR
Chivas Brothers Limited	111-113 Renfrew Road	Paisley	PA3 4DY
Craigton Packaging	Scott's Road	Paisley	PA2 7AN
Davis & Davis	39 Brora Drive	Renfrew	PA4 0XA
Diageo Global Supply	1 Argyll Avenue	Renfrew	PA4 9EA
Diageo Global Supply	500 Renfrew Road	Renfrew	G51 4SP
Earl Haig Foods Ltd	15 Earl Haig Road	Hillington Park	G52 4JU
Fat Boy Distribution Ltd	28 Queen Elizabeth Ave	Hillington Park	G52 4NQ
Foxbar Butchers	44 Foxbar Road	Paisley	PA2 0AY
G Porrelli & Co Ltd	25 Lacy Street	Paisley	PA1 1QN
G&A McHarg	Dalziel Road	Hillington Park	G52 4NN
Gleddoch Family Butchers	60 Glasgow Road	Paisley	PA1 13W
Hannah's of Johnstone	18-20 Walkinshaw Street	Johnstone	PA5 8AB
Henderson Meats	Bargarran Square	Erskine	PA8 6BS
Houston Brewery	58 Kelvin Avenue	Hillington Park	G52 4GA
Ingram Brothers	15 East Lane	Paisley	PA1 1QA
Italian Lifestyle Express	Floors Street Ind. Estate	Johnstone	PA5 8PE
Jaw Brewery	67b Montrose Avenue	Hillington Park	G52 4LA
Jenier Limited	Darluith Road	Linwood	PA3 3TP
JoJo's Cakery	Mossedge Industrial Estate	Moss Road, Linwood	PA3 3HR
Kerry Foods (UK) Ltd)	55-59 Kelvin Avenue	Hillington Park	G52 4LT
Lang Fine Scottish Leather	1 Seedhill	Paisley	PA1 1JL
MacSpice/McAusland Crawford	79/81 Abercorn Street	Paisley	PA3 4AS
McNeil's produce	26 Newnham Road	Paisley	PA1 3DY
NCT Leather Ltd	Kilbarchan Road	Bridge Of Weir	PA11 3RL
Overton Dairy	Burntshields Road	Kilbarchan	PA10 2PB
Peppermill Foods Ltd	14 Watt Road	Hillington	G52 4RY
Rice 'n' Spicy	15 Edison Street	Hillington Park	G52 4JW
Sgaia Foods	88 Greenhill Road	Paisley	PA3 1RD
Stephen Williams First Class	4b Mains Drive	Erskine	PA8 7JQ

Sutherland Cakes	15-17 Earl Haig Road	Hillington	G52 5JU
The Elderslie Scottish Tablet Co	37 Glenpatrick Road	Elderslie	PA5 9AE
W P Tulloch	22a Skye Crescent	Paisley	PA2 8EL

3.6 Advice to Business

Communities & Public 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 and Licensing 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 Public Protection, co-ordinated by a designated Health Promotion Officer. Through this integrated approach, the Service assists in signposting training opportunities, and 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 also 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 2018/19. Activities will be communicated via the Council website and also social networking sites and press releases.

Premises Name	Premises Address
Accord Hospice	Morton Avenue, Paisley, PA2 7BW
BP Connect & Wild Bean Cafe	White Cart Road, Paisley, PA3 2TH
Braemount Care Home	21 Donaldwood road, Paisley, PA2 8EA
Capability Scotland	Wallace Court, 191 Main road, Elderslie, PA5 9EJ
Erskine mains Care Home	Meadow drive, Erskine, PA8 7ED
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, Orchard Court	Orchard Street, Renfrew, PA4 8RZ
Hanover(Scotland) Housing Association, Walikinshaw Court	Walkinshaw street, Johnstone, PA5 8AF
Kibble Education & Care Centre	Goudie Street, Paisley, PA3 2LG

Kibble Works	55 Clark street, Paisley, PA3 1RB
Little Inch Care Home	8 Rashilee Avenue, Erskine, PA8 6HA
Holiday Inn	Caledonia Way, Glasgow Airport PA3 2TE

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 12 premises with Eat Safe Awards.

3.9 Sampling

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 2018/19 is attached as Appendix 1 to this Service Plan. The programme will focus on high risk premises in Renfrewshire, whilst reflecting national priorities recommended by FSS and SFELC.

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

Communities & Public Protection 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 with the Public Health Protection 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 2017/18 there were 32 cases of food poisoning reported and investigated by Environmental Health Officers.

Present resources within Communities & Public Protection 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, 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
 Marine Scotland
 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 2018-19 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. This split is at the discretion of the Business Regulation Manager and can be amended where there is a service demand.

In addition, the figure for employee costs includes 0.25 of a Trading Standards Officer post for the delivery of Feed Controls.

Budget	2018/19
Employee Costs	£335,987
Supplies and Services	£180,701
Travel and Subsistence	£9,430
Training	£1,600
Total	£527,718

Projected Income Source	2018/19
Export Health Certificates	£9,700
Sales, Fees and Charges	£500
Miscellaneous Income	£3,900
Total	£14,100

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 are held including: the REHIS Advanced Food Hygiene Diploma, the REHIS Certificate in the Inspection of Meat and Other Foods, Certificate in Nutrition & Health 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 Scotland and Health & Safety Executive. Any employee attending such a course is required to "cascade" the relevant information accrued as a result of their attendance to other 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 2018/19.

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 within the Service. The Communities & Regulatory 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 Communities & Regulatory 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 2017/18 Inspection and Sampling Programmes**

The following table details performance against targets for 2017/18**

Programmed Food Hygiene Inspections		
Activity	Targets for 2017/18	Achieved
Category A (6 months)	24	24 (100%)
Category B (12 months)	203	203 (100%)
Category C(18 months)	330	330 (100%)
Category D (2 years)	173	171 (99%)
Category E (Alt. Enforcement /3 Years)	195	192 (99%)
Total	925	921 (99%)
Programmed Food Standards Inspections		
Activity	Targets for 2017/18	Achieved
High Risk (1 year)	10	10 (100%)

Medium Risk (2 years)	134	134 (100%)
Low Risk (5 years)	4	4 (100%)
Total	148	148 (100%)

Complaints/Enquiries/Requests for Service received 2017/18	1141
Total Number of Health & Safety Inspections/Visits 2017/18	83

Programmed Food Hygiene Inspections: Performance remains high in this area as 99% of visits due, took place within the required timescales. All higher risk (A to C) category premises were inspected and 4 lower risk premises were not inspected within the required timescale. One of these businesses remains outstanding as no access can be gained, one business has closed and the other businesses have now been inspected.

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: 100% of targeted inspections were achieved.

Alternative Enforcement: The service has adopted an Alternative Intervention Strategy which is 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 was an increase in the number of service requests received. This is due, in part, to the recording of requests for export certification. These were previously not included in the figures.

Sampling:

The Food Sampling programme for 2017/18 continued the risk based approach to sampling. A number of projects were undertaken and follow-up action and surveillance based on results will be carried over into 2018/19. Results are shown in the following table;

119 samples were taken in total during the year; 55 for composition/chemical analysis with 4 fails and 64 for microbiological examination of which 24 failed. All failed samples were followed up or are currently being followed up with interventions by officers. Items included in the project work undertaken for the year are detailed below. **Note: The number of samples taken was determined by availability and priorities for the year.**

Time of Year	Sample Type	Type of Premises	No. of samples Planned	Actual Taken	Pass	Fail
July 2017 to March 2018	Microbiological quality Non pre-packed fruit and veg salads and garnishes (including salads with mayonnaise e.g. coleslaw	Caterers & Retailers	10	16	16	0
July 2017 to March 2018	Microbiological quality of ready to eat fish and shellfish products	Caterers & Retailers	18	12	10	2
July 2017 to March 2018	Microbiological Quality of Fresh Herbs	Caterers & Retailers	5	8	8	0
July 2017 to March 2018	Microbiological quality of Non-pre-packed sandwiches and sandwich fillings containing mayonnaise	Caterers	10	10	9	1
July 2017 to March 2018	Microbiological quality of Non-pre-packed cooked sliced meats (tests to include Salmonella, Campylobacter and E.coli O157)	Caterers	10	10	1	9
July 2017 to March 2018	Microbiological quality of Vacuum packaged ready to eat foods with a shelf-life longer than 10 days	Manufacturers	5	5	5	0
July 2017 to March 2018	Swabs from ready to eat contact equipment (focus on slicing blades and slicing machines)	Butchers	10	15	15	0
July 2017 to March 2018	Meat speciation in venison products	Butchers/Retail	4	2	2	0
July 2017 to March 2018	Free-from claims with a focus on gluten-free and the presence of dairy in non-dairy yoghurt, cheese and milk substitutes	Retailers	10	5	5	0
July 2017 to March 2018	Preservative in Jarred chutneys and relishes	Retailers	3	0	0	0
July 2017 to March 2018	Meat speciation Prepared meals (curries, kebabs etc.) (and mis-use of colours where appropriate)	Caterers (Chinese/Indian /Turkish style)	10	10	8	2

July 2017 to March 2018	Speciation Fish / Fish products (battered, breaded and with sauces)	Caterers	10	10	10	0
July 2017 to March 2018	Speciation Fish / Fish products (prepacked fresh and frozen)	Retailers	10	10	10	0

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 2018/19 is based on local priorities, the national programme in agreement with SFELC and the West of Scotland Food Liaison Group. (See Appendix 1).

6.2 Areas for Improvement

It is considered that the service would benefit from an electronic file management system as well as pursuing options to introduce mobile technology to improve efficiency. During 2017/18, further preliminary research was carried out with other local authorities who use similar IT systems to this service. Work in this area is ongoing.

Further development of the APP electronic database will also be pursued during 2018/19.

7. Emerging Issues 2018/19

Food Crime

This continues to be a focus for FSS and Food Authorities. Food Crime erodes confidence and disempowers consumers. This leads in turn to financial losses, negative economic impact and poses a threat to jobs and exports. This is why tackling food crime is so important and why The Scottish Food Crime and Incidents Unit (SFCIU) has been established. The Business Regulation Team will continue to build on the established working relationships with partner Agencies including SFCIU.

Review of Risk Rating Scoring System

In 2012, The Scudamore report **“Review of future arrangements to secure food standards and safety in Scotland”** was published. One of the main recommendations was that: ***“FSA Scotland should review the Food Law Code of Practice (Scotland) to determine if the current risk rating and intervention frequencies are appropriate and represent the best use of enforcement resources in Scotland”***.

In February 2014, The Scottish Food Liaison Enforcement Liaison Committee (SFELC) set up a Working Group tasked with examining the existing arrangements in Annex 5 of the Food Law Code of Practice (Scotland). The group assessed whether an alternative regime would deliver more effective prioritisation of food law enforcement in Scotland.

In September 2016, Renfrewshire Council were invited to be one of 10 Scottish local authorities to take part in a 1-year pilot, commencing October 1 2016, to develop a risk rating scoring scheme to replace the existing Annex 5. From April 2017, Renfrewshire Council have adopted the scheme prior to the full roll out to the remaining Local Authorities.

Review of Risk Rating Scoring System

Food Standards Scotland is currently consulting on the new Food Law Code of Practice (Scotland). Whilst the basis of the code will remain the same, there will be alterations to food law inspections in Scotland. Renfrewshire Council responded to the consultation and all Officers will receive appropriate training in the new Code of Practice.



Communities, Housing and Planning Services

**BUSINESS REGULATION – FOOD SAMPLING
PROGRAMME**

2018/19

1. INTRODUCTION

The annual sampling programme for 2018-19 is designed to fulfil aims and objectives in line with Communities, Housing and Planning Services 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 2018/19 is designed to be more focused on high risk/high value products which are manufactured in Renfrewshire. Focussing on these items will ensure that those 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 overtly.

2.2 Formal Samples

In accordance with the Regulatory Services Integrated 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

FSS and The Scottish Food Enforcement Liaison Committee have identified, through intelligence, the areas deemed to be priorities in terms of sampling. The priority plan considers the Scottish perspective but also takes account of

the UK. FSA. priorities. In addition to National priorities, Renfrewshire Council will focus on areas of particular interest to the authority.

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 2018/19

The sampling plan for 2018/19 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 Communities, Housing and Planning Services 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.

3.3 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 2018/19, along with other local surveillance activities outlined in the table below at point 4.2:

4.2 Sampling Plan

Time of Year	Sample Type	Type of Premises	No. of samples
July 2018 to March 2019	Raw, fresh pork meat	Retailers and/or caterers	10
July 2018 to March 2019	Breaded, raw, fresh, chicken goujons, breasts, fillets	Retailers	10
July 2018 to March 2019	Raw shell eggs and raw egg mixes	Caterers	10
July 2018 to March 2019	Ready-to-eat bagged leafy salads	Retailers	5
July 2018 to March 2019	Fried potato products and ethnic breads	Caterers	5
July 2018 to March 2019	Raw and cooked cured meats	Retailers	5
July 2018 to March 2019	Cereals and cereal-based products	Retailers Distributors/ Transporters Importers/Exporters	5
July 2018 to March 2019	Lean minced meat and minced steak	Retailers	10
July 2018 to March 2019	Pre-packed foods with 'reduced' nutritional claims	Retailers	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 2017/18

The Food Sampling programme for 2017/18 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 2018/19.

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.