
Report To:	Education & Communities Committee	Date:	8 September 2015
Report By:	Head of Safer & Inclusive Communities	Report No:	EDUCOM/75/15/MM
Contact Officer:	Martin McNab	Contact No:	4246
Subject:	Items for Noting - Communities		

1.0 PURPOSE

- 1.1 The purpose of this report is to keep the Committee apprised of matters which fall within its remit for information purposes.

2.0 FSS Audit of Inverclyde Council

- 2.1 Food Standards Scotland (FSS), the public sector food body for Scotland, launched on 01 April 2015, taking over the responsibilities previously carried out in Scotland by the Food Standards Agency (FSA), including the remit to oversee Local Authority food law enforcement activities to ensure appropriate local services are in place.
- 2.2 In June 2015 FSS carried out a core audit of Inverclyde Council's implementation of official controls on the hygiene of foodstuffs in food business establishments and the application of the Food Hygiene Information Scheme. The last audit of the service was in August 2011. Inverclyde Council's Food Service is delivered by the Food & Health Team of Safer & Inclusive Communities.
- 2.3 The ensuing audit report is attached at Appendix 1. As can be seen from the report there were no areas of concern or recommendations arising from the audit. Following audit checks and interviews the auditors were satisfied that "it was evident...that Officers were taking a graduated approach to enforcement and actively worked with businesses to achieve compliance" (Para 3.2.1). Auditors further found that "Officers were....knowledgeable about the premises, the authority's policies and procedures, the relevant legislation and had the confidence of the Food Business Operator" (Para 3.2.11). These audit findings confirmed that officers were working in accordance with the Food Safety Enforcement Policy approved by Committee in March 2015.

3.0 Official Food Controls Service Plan 2015/16

- 3.1 The Framework Agreement on Official Feed and Food Controls by Local Authorities requires Local Authorities to produce service plans for the carrying out of those functions. The plan for 2015-16 was unfortunately not complete in time for the May Committee but is attached as Appendix 2.
- 3.2 The plan follows a common format and must cover certain areas of service delivery. The attached plan was however checked as part of the audit referred to in 2.0 above and was found to be satisfactory.
- 3.3 The framework agreement does not require the plan to have formal committee approval but it is appropriate to bring it to members' attention.

4.0 Outdoor Education – School Consultation

- 4.1 The Education & Communities Committee of 5 May 2015 approved in principle the use of the outdoor education budget for the development of curricular & non-curricular mountain biking at the new facility at Rankin Park from 2016 onwards.
- 4.2 The committee further requested a consultation with primary schools on their views on this and agreed to remit any funding implications to Policy & Resources Committee.
- 4.3 The results of the consultation are contained at Appendix 3. Responses were received from 18/20 primary schools in Inverclyde. As can be seen from the consultation 11 schools were in favour of the proposals, 4 unsure and 3 against. Closer reading of the comments however reveals that 8 schools were unequivocally in favour of the move to mountain bike provision, 6 favoured a mix of mountain biking and traditional trips, 1 was unsure and 3 favoured traditional trips.
- 4.4 In line with the decision of the committee therefore a report will be submitted to the September Policy & Resources Committee seeking funding from 2016/17 onwards for the continuation of funding for residential trips.

5.0 Local Housing Strategy

- 5.1 The Committee has been previously advised that a future report would be presented for the Committee to consider extending the current Local Housing Strategy which is due to end on 31st March 2016 by a further 3 years to bring it in line with the Local Development Plan. This was subject to obtaining the agreement of the Scottish Government.
- 5.2 The Scottish Government have now responded to our consultation and have advised that although they are sympathetic to our request they cannot endorse the proposed extension as these Strategies should only have a 5 year life and there is a risk that our Strategy would become out of date.
- 5.3 The Service accepts the Scottish Government response. The Service will develop a replacement during the latter half of 2016 with a proposed launch date of early 2017 for the new 5 year Strategy.

6.0 A 3 year plan for co-ordination of community learning and development in Inverclyde

- 6.1 On 11 August 2015, the Policy and Resources Committee approved the above plan. This ensured the Council's compliance with Regulation 4 of the 'Requirements for Community Learning and Development (Scotland) Regulations 2013' which stipulate that each local authority should 'consult on and publish plans every three years containing specified information on the provision of CLD by both the local authority and its partners. The first plan should be in place not later than 1 September 2015'.
- 6.2 Progress reports on the implementation of the plan will be brought to the Education & Communities Committee.
- 6.3 The purpose of the plan

The purpose of the 3 year plan for co-ordinating CLD in Inverclyde 2015-2018 is to maximise the contribution of CLD to achieving the outcomes of the Inverclyde Alliance Single Outcome Agreement by:

- Co-ordinating provision of CLD in the broadest sense, essentially all learning and development that takes place in the community, other than vocational training and programmes delivered by teachers in school and by further education lecturers
- Integrating planning for CLD within community planning, adding value to existing

planning and evaluation.

6.4 Outcomes of the plan

Outcome 1 The needs of individuals and communities for CLD are met

This will be achieved by:

- improving the way we co-ordinate the assessment of needs and strengths in our communities and the identification of unmet need
- knowing and understanding our communities
- building on the strengths of our communities, working together to improve life chances and the quality of community life.

Outcome 2 The impact of CLD in Inverclyde is maximised through effective planning and co-ordination

This will be achieved by:

- ensuring that all CLD provision is mapped to Inverclyde Life and that everyone knows how to access the programmes and support they need
- creating learning and development pathways and supporting people along them
- clearly delineating how and where CLD is planned and co-ordinated within our community planning infrastructure.

Copies of the full plan will be available at the meeting .

7.0 CLD Service Annual Report 2014-2015

7.1 The CLD Service has developed a new annual reporting format designed to provide a vehicle for:

- collating and reviewing the findings of our self-evaluation activities
- reflecting on and celebrating the achievements and impacts of the Service
- informing stakeholders and participants of the range and impact of the work of the Service.

7.2 The following summarises highlights from the report.

An excellent year for the CLD Service

- report on the inspection of the learning community surrounding Clydeview Academy
- success on the national stage

Skills for life – supporting people to acquire the knowledge, skills and confidence necessary for them to play an active and productive role in their personal, community, family and working lives

Adult learning

- 868 learners participated in health and well-being programmes
- 146 learners participated in digital skills programmes and 447 in programmes combining digital skills with financial support
- 473 learners participated in employability programmes and community based work clubs
- 100 families participated in parenting and family learning programmes supported by the CLD Service

Adult literacies

- 563 participants in adult literacies – 75% of whom were unemployed at the point of registration, 50% of whom live within the most deprived 15% of communities in Scotland
- 281 learners received accreditation in 345 certificated units
- Customised programmes developed and co-delivered with – Action for Children-Moving On, MCMC, Jobcentre+ Greenock, HMP Greenock, IBM, Jericho Society, Working Links, Inverclyde Royal Hospital and St Columba's High School.

Strong, successful communities – supporting and building community capacity

Community work

- 46 community groups involving 484 community members supported by the team
- Well-attended 'cluster groups' brought together Community Councils, community associations and voluntary organisations to discuss areas of common interest and concern within communities across Gourock, Greenock and Port Glasgow.
- A successful International Women's Day event where 58 local women discussed the issues facing local women and shared ideas for taking forward plans to tackle them.

Outreach and volunteering

- 42 adults volunteer in a range of programmes across adult learning and literacies
- Support for 5 community hubs and surrounding geographical areas: Auchmountain Halls, Clune Park, Paton Street, Branchton Community Centre and Larkfield Youth Connections.
- 760 door to door listening surveys carried out across the community, including 218 surveys carried out in the Gibshill area
- 228 family needs assessments carried out
- 624 adult guidance sessions delivered
- 10 awareness raising events carried out at community and partner events
- 37 awareness raising sessions carried out in geographical areas in local venues and with key partner organisations

Our young people

Youth Work

- IYouthzone Greenock now has over 400 members and the newly opened IYouthzone Port Glasgow has already achieved over 100 members
- Over 30 LGBT young people supported by the service – activities have included Pride March and a blood donation campaign
- Successful new initiatives including – mother and toddler group, SQA volunteering award, pilot involving all 3 year pupils from St Columba's and Stephen's High Schools in the Duke of Edinburgh Bronze Award

Copies of the full report will be available at the meeting.

8.0 IMPLICATIONS

Finance

8.1 N/A

Financial Implications:

One off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report £000	Virement From	Other Comments
N/A					

Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact £000	Virement From (if Applicable)	Other Comments
N/A					

Legal

8.2 N/A

Human Resources

8.3 N/A

Equalities

8.4 N/A

Repopulation

8.5 N/A

9.0 CONSULTATIONS

9.1 N/A

10.0 LIST OF BACKGROUND PAPERS

10.1 N/A

Food Standards Scotland

Report on the Core Audit of Local Authority Official Controls in relation to Regulation (EC) No 852/2004 on the Hygiene of Foodstuffs in Food Business Establishments and the Application of the Food Hygiene Information Scheme

Inverclyde Council

16 - 18 June 2015

Foreword

Audits of Local Authorities food law enforcement services are part of Food Standards Scotland arrangements to improve consumer protection and confidence in relation to food and feed. These arrangements recognise that the enforcement of UK food law relating to food safety, hygiene, composition, labelling, imported food and feeding stuffs is largely the responsibility of Local Authorities. These Local Authority regulatory functions are principally delivered through Environmental Health and Trading Standards Services. The Food Standards Scotland website contains enforcement activity data for all UK local authorities and can be found at:

www.foodstandards.gov.scot/food-safety-standards/regulation-and-enforcement-food-laws-scotland/audit-and-monitoring#la

The attached audit report examines the Local Authority's Food Law Enforcement Service. The assessment includes the local arrangements in place for Officer training, competency and authorisation, inspections of food businesses and internal monitoring. The audit scope was detailed in the audit brief issued to all Local Authorities under reference ENF/S/14/016 on 21 May 2014. The main aim of the audit scheme is to maintain and improve consumer protection and confidence by ensuring that Local Authorities are providing an effective food law enforcement service. This audit was developed to gain assurance that Local Authority food hygiene law enforcement service systems and arrangements are effective in supporting food business compliance, and that local enforcement is managed and delivered effectively.

The Audit scheme also provides the opportunity to identify and disseminate good practice and provide information to inform Food Standards Scotland policy on food safety, standards and feeding stuffs. Parallel Local Authority audit schemes are implemented by the Food Standards Agency's offices in all of the countries comprising the UK.

Specifically, this audit aimed to establish that:

- The organisation and management structure of the Local Authority is capable of delivering the requirements of the Food Law Code of Practice;
- Internal Local Authority service monitoring arrangements and documented procedures are consistent, appropriate, effective and comply with internal policies and procedures, and that corrective actions are implemented to ensure that interventions are carried out competently;
- Local Authority interventions and assessment of food safety management systems based on HACCP principles at food business premises monitor, support and increase food law compliance and are timely, appropriate, risk-based and effectively managed;
- Local Authority food business and enforcement records, including those in relation to food safety management systems based on HACCP principles, are sufficiently detailed, accurate, up to date and effectively managed;
- The Local Authority ensures consistency in implementation and operation of the Food Hygiene Information Scheme (FHIS). The aim is to ensure that where food business establishments are rated under FHIS and where consumers see FHIS branding, they

can be confident that the local authority is operating the FHIS as the Food Standards Scotland (FSS) intends.

Food Standards Scotland audits assess Local Authorities' conformance against the Food Law Enforcement Standard ("The Standard"), the 5th revision of which was published in April 2010 by the Food Standards Agency as part of the Framework Agreement on Official Feed and Food Controls by Local Authorities and is available on the Food Standards Agency's website at: <http://www.food.gov.uk/multimedia/pdfs/enforcement/frameworkagreementno5.pdf>

It should be acknowledged that there will be considerable diversity in the way and manner in which Local Authorities may provide their food enforcement services reflecting local needs and priorities.

For assistance, a glossary of technical terms used within this audit report can be found at Annexe C.

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1.0 Introduction

- 1.1 This report records the results of an audit at Inverclyde Council with regard to food hygiene enforcement, under relevant headings of The Standard in The Framework Agreement on Official Feed and Food Controls by Local Authorities. The audit focused on the Authority's arrangements for the management of food premises inspections, enforcement activities and implementation of the Food Hygiene Information Scheme. The report has been made available on the Food Standards Scotland website at: www.foodstandards.gov.scot/food-safety-standards/regulation-and-enforcement-food-laws-scotland/audit-and-monitoring#la

Reason for the Audit

- 1.2 The power to set standards, monitor and audit Local Authority food law enforcement services was conferred on Food Standards Scotland by Sections 3 and 25 of the Food (Scotland) Act 2015 and Regulation 7 of The Official Feed and Food Controls (Scotland) Regulations 2009. This audit of Inverclyde Council was undertaken under section 25 (1-3) of the Act, and Regulation 7(4) of the Regulations as part of the Food Standards Scotland audit programme.
- 1.3 The last audit of Inverclyde Council's Food Service by the Agency took place in August 2011. The previous audit to that was in January 2008.

Scope of the Audit

- 1.4 The audit covered the Local Authority services for the delivery of official controls in relation to Regulation (EC) No 852/2004 on the hygiene of foodstuffs. In particular:
- The Service Plan, associated reviews and management of variances;
 - The review of all documented policies and procedures for enforcement activities;
 - The delivery of official controls for the intervention programme associated with the Regulation;
 - The means by which the Local Authority ensures that Officers are competent to effectively assess food safety management systems based on HACCP principles;
 - The implementation and effectiveness of intervention activities including the assessment of food safety management systems based on HACCP principles at food business premises;
 - The maintenance and management of appropriate records in relation to enforcement activity at food businesses;
 - The scoring of premises and the allocation of an outcome for the Food Hygiene Information Scheme;
 - Internal monitoring arrangements.
- 1.5 The audit examined Inverclyde Council's arrangements for official controls in relation to Regulation (EC) No 852/2004 on the Hygiene of Foodstuffs. The audit included verification visits to food businesses to assess the effectiveness of the official controls implemented by the Local Authority at the food business premises and, more specifically, the checks carried out by the Authority's

Officers to verify Food Business Operator (FBO) compliance with legislative requirements. The scope of the audit also included an assessment of the Authority's overall organisation and management, and the internal monitoring of other related food hygiene law enforcement activities.

- 1.6 The audit examined key food hygiene law enforcement systems and arrangements to determine that they were effective in supporting business compliance, and that local enforcement was managed and delivered effectively. The on-site element of the audit took place at the Authority's offices at 40 West Stewart Street, Greenock.

Background

- 1.7 Inverclyde Council's Safer & Inclusive Communities Service have the aim in relation to Food Control to work with local businesses in as open and transparent a manner as possible in order to help them where necessary, improve the safety of food and level of compliance with relevant legislation in line with the service's Food Safety & Standards Enforcement Policy. All enforcement will be in line with the principles of Better Regulation and will aim to adhere to the Scottish Regulators' Strategic Code of Practice. The authority will also respond efficiently to complaints about food quality, food premises, food labelling or food composition, originating from premises or purchases made within Inverclyde.

- 1.8 The Council's approach to the enforcement of Food Safety Law is informed by the following principles:

Proportionality - Enforcement action relates to the risks to the public, to the seriousness of any breach and to any actual or potential harm arising from a breach of the law.

Targeting - The regulatory activities of the Council are directed primarily on those whose activities give rise to the most serious risks or where the hazards are least well controlled. As such the Council maintains a risk based inspection programme in line with the requirements of the Food Law Code of Practice.

Consistency - Taking a similar approach in similar circumstances to achieve similar ends. This is not the same as uniformity and requires the exercise of professional judgement and discretion by inspectors.

Transparency - Helping Food Business Operators to understand what is expected of them and what they should expect from the Council as an enforcing authority. It also means making clear to FBOs not only what they have to do, but, where this is relevant, what they don't. This means distinguishing between statutory requirements and advice or guidance about what is good practice but not compulsory.

Public transparency also requires that the Council shall publicise successful enforcement actions such as prosecutions.

1.9 Formal Approaches

A decision to initiate a formal approach will be taken having regard to all relevant matters including:

- Any reasons offered by the proprietor for the failure to comply;
- Confidence in the Food Business Operator (FBO) to respond to an informal approach;

Whether requiring training may be a positive way forward;

- Risk(s) to public health associated with non-compliance
- Whether there has been a history of general non-compliance with food hygiene legislation.

1.10 The completed official controls as detailed in the Local Authority Enforcement monitoring Systems (LAEMS) returns for 2013-14 were as follows:

	Totals
Total Premises at 31 Mar 2014	681
Inspections and audits	305
Verification and surveillance	302
Sampling visits	2
Advice and education	26
Information/intelligence gathering	0
Total premises subject to official control	306

1.11 The Premises profile for Inverclyde Council in those returns were as follows:

	Total
Premise Rating - A	24
Premise Rating - B	66
Premise Rating - C	329
Premise Rating - D	68
Premise Rating - E	181
Premise Rating - Unrated	13
Outside programme	0
Totals	681

1.12 The Council's Food and Health Team within Safer Communities is responsible for delivering all aspects of food safety and standards within Inverclyde. A Team Leader manages two Environmental Health Officers, a Food Safety officer, a Senior Trading Standards Officer and a Trading Standards officer.

1.13 The Service Plan states that the authority has formal Home Authority arrangements with two businesses based in the area. Informal arrangements however exist with a number of other businesses and the authority would always seek to respond to all enforcing authority questions on food produced and labelled within Inverclyde in line with its Enforcement Policy.

- 1.14 The current Service Plan shows that the major items of financial allocation for Official Food Controls to be Staffing £114 750 and Sampling at £43 000. It is expected that there will be no growth expected in 2015/16 beyond any salary costs

2.0 Executive Summary

- 2.1 The Authority had developed and implemented an Official Food Controls Service Plans for 2015/16. The format and content of this is in accordance with the Service Planning Guidance in the Framework Agreement. The Service Plan is to be approved by the appropriate committee at the next meeting.
- 2.2 The Authority had developed a series of documented policies and operational procedures relating to many areas of their food law enforcement responsibilities. These documents were available to all Officers in electronic format on a central directory.
- 2.3 The authorisation format and supporting authorisation documents were generally satisfactory. Authorisation documents were available and were being used by Officers.
- 2.4 Individual Officer training needs were identified as part of their annual performance development plan. Officers were subject to regular reviews of performance and accompanied enforcement activities. Training records contained evidence that each Officer had completed a minimum 10 hours relevant training in the last year
- 2.5 The procedures and documentation provided for inspections were being appropriately and consistently reviewed and completed. Officers were clear on the Authority's procedure for conducting inspections and adhered to the Authority's Enforcement Policy and inspection procedures.
- 2.6 File checks of five general food hygiene premises confirmed that in all cases the Authority were completing detailed inspections, including the assessment of cross contamination risks and Hazard Analysis and Critical Control Points (HACCP) based food safety management systems. The Authority had completed the Scottish Food Enforcement Liaison Committee Cross Contamination strategy and had reverted to the use of the committees "Trigger Values"
- 2.7 Clearly worded reports and letters confirming the main findings from inspections were being provided. The information retained within the premises files provided sufficient evidence to support the basis for Officers' enforcement decisions and the Food Hygiene Information Scheme (FHIS) rating given.
- 2.8 Officers were taking a graduated approach to enforcement and actively worked with businesses to achieve compliance. The information reviewed relating to a series of Notices identified that the enforcement decisions reached were appropriate to the contraventions identified.
- 2.9 The Authority was routinely and consistently monitoring many aspects of food law enforcement work. Records of internal monitoring activities were available.

3.0 Audit Findings

3.1 Organisation and Management

Service Planning

3.1.1 The Authority has an official Food Controls Service Plan in place for 2015/2016 which is comprehensive and generally drafted in line with the Service Planning Guidance in the Framework Agreement. This plan has yet to be suitably approved by the Authority but this is expected to be done for September. There is to be a suitable review of service delivery with a report to committee via the Directorate Plan in the form of a separate report.

3.1.2 The Authority follows the inspection risk system contained within Annex 5 of the Food Law Code of Practice Scotland and followed the Scottish Food Enforcement Liaison Committee's (SFELC) Implementation strategy for the FSA cross-contamination guidance. This falls within the alternative enforcement arrangements stipulated in the guidance, of concentrating on high risk premises and having a 3 year exemption from doing low risk premises.

3.1.3 The aims of the Inverclyde Council's Safer & Inclusive Communities Service in relation to Food Control include:

- Following the completion of the implementation of the SFELC Implementation strategy for the FSA cross-contamination guidance in 2014 to return to a risk based inspection programme in 2015/16 in line with the requirements of the 2014 Food Law Code of Practice. The programme will include the continued phased re-integration of premises not inspected whilst the focus of the inspection programme was on cross contamination.
- To work with local businesses in as open and transparent a manner as possible in order to help them where necessary, improve the safety of food and level of compliance with relevant legislation in line with the service's Food Safety & Standards Enforcement Policy. All enforcement will be in line with the principles of Better Regulation and will aim to adhere to the Scottish Regulators' Strategic Code of Practice.

The re-integration of missed premises falls within the alternative enforcement arrangements stipulated in the guidance, of concentrating on high risk premises and having a 3 year exemption from doing low risk premises.

3.1.4 The Official Food Control Service Plan details the food hygiene inspection programme for 2014-2015 and 2015-2016 as:

Risk rating	2014-2015 Numbers	2015-2016 Numbers
Category A	29x2	5x2
Category B	70	71
Category C	156	142
Category D	39	32
Missed C & D		44
Category E	9	3

Unrated	63	
Total	366	297

The Food Law Code of Practice (Scotland) details that the food hygiene minimum intervention frequencies are:

Risk rating	Frequency of inspection (at least every)
Category A	6 months
Category B	12 months
Category C	18 months
Category D	24 months
Category E	A programme of Alternative Enforcement Strategies or interventions every three years

- 3.1.5 It is noted that the missed inspections in the programme are as a result of the implementation of the SFELC Cross Contamination Guidelines.
- 3.1.6 Glasgow Scientific Services (GSS) provide analytical and microbiological services in addition to being the appointed food examiner for Inverclyde Council. There is a letter of appointment from Glasgow Scientific Services dated July 2014 which quotes the 1990 rather than the 2013 legislation for food which has been suitably amended.
- 3.1.7 The Service Plan states that the authority has formal Home Authority arrangements with two businesses based in the area. Informal arrangements however exist with a number of other businesses and the authority would always seek to respond to all enforcing authority questions on food produced and labelled within Inverclyde in line with its Enforcement Policy.
- 3.1.8 Currently the Food Safety Service at Inverclyde District Council is suitably resourced in terms of budget, Senior Environmental Health Officer Managers and their position within the Council. The service has a suitably qualified Food Safety Officer who assists with the delivery of food sampling activities among other duties. All of these elements are critical to the current high level of performance.

Enforcement Policy

- 3.1.9 The Authority has an updated 2015/16 Food Safety Enforcement Policy that replaces one that was aimed specifically at the implementation of the Scottish Enforcement Liaison Committee's Cross Contamination Strategy. There is also an effective food safety enforcement procedure in place.
- 3.1.10 Inverclyde Council initially operate a graduated and educative approach. With a presumption against formal enforcement as an initial outcome in most situations, it recognises that it should be occasionally be considered in circumstances where businesses consistently fail to respond to informal attempts to secure compliance and/or where there are risks to food safety.

Officers were found to be ensuring that enforcement action is reasonable, proportionate, risk-based and consistent with good practice.

Where the contravention appears to relate to a deliberate act to mislead and or defraud consumers and/or other business operators and is considered to be a criminal offence, the graduated approach will not be applied and the default position will be to consider submitting a report to the Procurator Fiscal.

- 3.1.11 The Enforcement Policy has an Appendix which covers the service of formal notices, seizure detention and surrender procedures, prosecutions, the withdrawal / suspension of approval and the service of notices and their follow up.

Documented Policies and Procedures

- 3.1.12 The Authority has a set of policies and procedures that comply with the requirements of the Framework Agreement. The procedures are easily understood and some have recently been updated.
- 3.1.13 Procedures are in place for officer authorisation, internal monitoring and many areas of enforcement, e.g. food alerts and food incidents, programmed food hygiene inspections, Article 5 of Regulation EC No 852/2004, food complaints, reports to the Procurator Fiscal, food sampling and an NHS Greater Glasgow and Clyde Response to notifications
- 3.1.14 A comprehensive aide memoire and a food safety verification and surveillance record (yellow sheet) are in place for Officers to use to record findings of inspections.
- 3.1.15 An electronic document control system is in place and all policies and procedures are managed by the Lead Food Officer. Officers have access to the current versions from the shared drive. Procedures are updated to reflect legislative or other changes.

Authorisation and Training Files

- 3.1.16 The Authority had developed and implemented a documented procedure for the Authorisation of Officers. Authorisation documents were readily available and those that were checked were very detailed and the procedure document is exceptionally clear and comprehensive.

Good Practice

The Authority have developed and implemented a simple, effective and very clear system of authorisation.

- 3.1.17 General and specific training had been undertaken by most Officers in many subjects including enforcement, the Campden BRI delivered five day Hazard Analysis Critical Control Point (HACCP) course and the subsequent two day validation and verification course. It would be good practice to have the few officers who have not yet completed these, do so when the courses become available
- 3.1.18 Audit checks confirmed that all Officers' qualifications were available, that copies of relevant qualification certificates had been retained by the Authority and were current. Both general and specific training had been undertaken by officers in many subjects.
- 3.1.19 Individual Officer training needs were identified annually as part of the annual performance review and development plan. All training records examined contained evidence of a minimum 10 hours relevant training in the last year based on the principles of continuing professional development.

Database and Monitoring Returns

- 3.1.20 Checks of the database were found to show that premises were being inspected at the correct frequencies. It was also noted the Authority had returned to using the Scottish Food Enforcement Liaison Committee (SFELC) trigger values at the end of the Cross Contamination Strategy. This resulted in those premises that were not broadly compliant with the legislation having a further inspection programmed within three months.

The Authority had 681 premises reported through LAEMS for 2013-214. All high risk inspections had been completed. There were a small amount of low risk interventions outstanding. This issue should not have an effect on the authorities annual LAEMS return as it is a correct implementation of the cross contamination guidance.

3.2 Enforcement

- 3.2.1 It was evident from audit checks and interviews that Officers were taking a graduated approach to enforcement and actively worked with businesses to achieve compliance.

Food Premises Inspections

- 3.2.2 The Authority was implementing an effective risk based food premises intervention programme. Revisits were being carried out where premises inspected did not comply with the requirements of legislation. The re-introduction of the SFELC trigger values has brought forward inspection frequencies for those premises not found to be broadly compliant. These secondary inspections are when an officer gives a score of 15 or more in either of the compliance elements of the inspection rating schemes, acting as the trigger for a secondary inspection to be scheduled.

Premises Files including Inspection Reports and Records

- 3.2.3 The Authority has an electronic system for record keeping. The system is capable of providing information required by Food Standards Scotland and appropriate security and backup systems appear to be in place to minimise the risk of corruption or loss of data.
- 3.2.4 File checks of five files of recent food interventions were found in the most part to be comprehensive and detailed. From the files examined, inspection frequencies were in accordance with the Food Law Code of Practice. Appropriate aide memoires and a food safety verification and surveillance record were used as required and were suitably completed. Risk ratings had been correctly applied and inspections had been carried out by suitably qualified Officers. The files contained evidence of appropriate enforcement actions.
- 3.2.5 Food Business Operators were provided with a letter after the inspection, confirming the main findings from the inspection. The Food Safety Inspection form was being used to gather information on the operation of the business relevant to hazards, risks, management effectiveness and compliance with relevant legislation. The Pre-requisites for safe operating practices were also being collected and recorded, The programmed Food Hygiene Inspections procedure also refers to two other supplementary sources of information collection, these are aide memoires on cross contamination and on Article 5 (of Regulation (EC) No. 852/2004). The aide memoire included a requirement for a brief sketch of the layout of the premises to be part of the record.
- 3.2.6 Letters were clearly worded and included schedules which clearly and consistently differentiated between legal requirements and recommendations of good practice. The contraventions identified clearly stated the measures required to secure compliance. The timescales for the required works to be completed to resolve legal contraventions were however only given in general terms of "by the time of next inspection" These timescales should be made specific to each of the items requiring attention. Revisits were made to premises where necessary to ensure that required works had been completed.

Verification Visits to Food Premises

- 3.2.7 During the audit, verification visits were undertaken to two higher risk premises. These were to a home which served vulnerable groups and a local butcher. The Authorised Officers who had carried out the recent programmed inspections accompanied the auditors on the verification visits. The main objective of each visit was to assess the effectiveness of the Authority's assessment of the Food Business Operators (FBO's) compliance with the food law requirements of Regulation (EC) No 852/2004.
- 3.2.8 Interviews were held with the individual Officers before the verification visits took place to confirm the contents of the file records and to explain the format and objectives of the visit. It also gave the Officers the opportunity to explain the inspection process, i.e. the preparatory work carried out prior to an inspection and the general process while on site, which included a

preliminary interview with the FBO, the general hygiene checks to verify compliance with the structure and hygiene practice requirements and checks carried out to verify compliance with HACCP based procedures and the decision process for the Food Hygiene Information Scheme outcome.

- 3.2.9 Both visits confirmed that checks carried out by Officers were detailed, thorough and had adequately assessed business compliance with structure and hygiene practice. Officers had assessed cross contamination and HACCP compliance during the inspection and had commented where appropriate. The inspection aide-memoire used at the visits detailed that CookSafe and Butcher Safe were being used where appropriate and that records and other appropriate documents had been examined by the Officer.
- 3.2.10 In both visits, Officers had been found to have correctly assessed the premises in terms of the Food Hygiene Information Scheme and had correctly assessed one premises as a Pass and one as an Improvement Required.
- 3.2.11 Officers were found to be knowledgeable about the premises, the authority's policies and procedures, the relevant legislation and had the confidence of the Food Business Operator.

Notices and Prosecutions

- 3.2.12 Five Hygiene Improvement Notices were selected for examination along with three Remedial Action Notices. At the time of audit there had been no referrals to the Procurator Fiscal within a reasonable timescale, so older files were not examined and there were no Regulation 27 notices to check at the time of audit.
- 3.2.13 The notice format followed that required in the Code of Practice and the wording of those available for audit were correctly drafted and had evidence of service recorded with two Officers carrying out the function. The matters arising that required a notice had been suitably identified. Follow up visits and letters had been completed and were in accordance with the practice guide

Seizure, Detention and Voluntary Surrender of Food

- 3.2.14 At the time of audit the Authority had not recently been required to take formal action, no documentation was examined.

Food Sampling

- 3.2.15 There is a documented sampling policy and the Authority have a Food Safety Officer to manage, organise and conduct the sampling programme. Samples are taken with a local focus on high risk premises. Three samples were selected and checked. Each sample had been taken by an appropriate Officer. The results were all on file and the appropriate action had been taken on receipt of the results.

Alternative Enforcement Strategies

- 3.2.16 The Authority was not implementing an alternative enforcement strategy at the time of audit.

3.3 Investigations and Promotion

Food Related Infectious Disease Notifications and Investigation

- 3.3.1 The Authority receives occasional notifications of food related Infectious diseases from Greater Glasgow and Clyde Health Board. There has been some recent occasions where the quality of data passed to the authority was considered as being poorly detailed and it is understood that this is to be discussed soon with the six Local Authorities within the Health Board Area. It was noted that the Health Board do not inform the Authority of notifications of campylobacter. Two recent notifications were selected and reviewed and in each case an appropriate investigation had taken place. Food Standards Scotland are to consider the impact of these developments.

Food Alerts, Incidents and Rapid Alert System for Feed and Food (RASFF)

- 3.3.2 Notification of alerts, incidents or a RASFF are received by Inverclyde Council from Food Standards Scotland. There is a Food Alerts procedure managed by the Team Leader which includes initiation of an alert within the authority.
- 3.3.3 One Food Alert for Action was reviewed and was found to have been documented in accordance with the Procedure.

Food Hygiene Information Scheme (FHIS)

- 3.3.4 Food Standards Scotland, in partnership with local authorities, operates the FHIS in Scotland. The scheme encourages businesses to improve hygiene standards. The overarching aim is to reduce the incidence of foodborne illness and is designed to give straightforward information to the general public about how each food outlet fared at its last food hygiene inspection carried out by its local authority.

Inspection Outcomes of the Scheme

- 3.3.5 Food hygiene inspections aim to measure food establishments against compliance criteria. Regular inspections are already carried out as part of routine enforcement duties and the outcome of inspections is that an establishment is deemed to be broadly compliant or not.
- 3.3.6 The inspection outcomes of the Food Hygiene Information Scheme should reflect compliance and should be visible at the establishment, on the Local Authority web site and also on www.foodstandards.gov.scot. The authority uploads information to the Food Standards Scotland web-site on a weekly basis.

The key features of the scheme

- 3.3.7 The scheme is voluntary and provides transparency of enforcement inspection outcomes which are shown in simple and clear terms. The assessment of compliance for the purposes of the scheme is significantly different from assessment of risk-rating undertaken following programmed inspections. This ensures that there is no conflict between these assessments, which are designed to serve different purposes.
- 3.3.8 The Authority has a procedure for FHIS Food Safety Inspections & issue of certificates which details the purpose, inspection procedure and post inspection procedure. The scheme rating is confirmed in the letter sent after the programmed inspection.
- 3.3.9 Five file checks were undertaken in connection with the Food Hygiene Information Scheme. Four of the premises were passes and one was improvement required. The appropriate pass certificates had been issued to the premises concerned. The authority do not issue improvement required certificates. The improvement required premises was subject to a re-visit and was then issued a pass. The Authority does notify businesses of the appeal mechanism for an improvement required certificate. Officer opinion was that Food Business Operators were not overly enthusiastic about the scheme in its present format.

All premises had been correctly selected for the Scheme and had been correctly scored for the appropriate award. Where premises had gone from Improvement Required to a Pass, as a result of a further visit, the risk rating of the premises had not been altered, which is correct and in line with the FHIS guidance.

3.4 Internal Monitoring

- 3.4.1 Comprehensive and detailed monitoring of both quantity and quality of work was being regularly completed and recorded. Using older versions of Food Standards Scotland Checklists the scope was very comprehensive. Officers were informed of the outcomes of the monitoring and were able to discuss these with the Team Leader.
- 3.4.2 Quantitative monitoring checks are carried out by the production of monthly work programmes from the electronic database which officers update and return. There are regular documented team meetings where Officer discuss issues relevant to enforcement consistency.

Auditors: Graham Forbes
Kevin McMunn

Food Standards Scotland
Audit Branch

ANNEXE A**Action Plan for Inverclyde Council**

Audit date: 16-18 June 2015

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
There were no recommendations from this audit			

Audit File Closed 04 August 2015

ANNEXE B

(1) Examination of Local Authority policies and procedures

The following Local Authority policies, procedures and linked documents were examined before and during the audit:

- Official Food Controls Service Plan 2015/16
- Food Safety and Health & Safety Enforcement Policies report to Education and Communities Committee 10 March 2015
- Food Safety & Standards Enforcement policy
- Programmed Food Hygiene Inspections
- Food Safety Inspection check list
- Food Safety Inspection Form
- Glasgow Scientific Services reporting of statutory samples letter of 9 July 2014
- Officer Authorisation – Documented procedure
- Food Sampling – Documented procedure Version 12/05/15
- Food alerts and food incidents – Documented Procedure
- Food Complaints – Documented Procedures 12/05/15
- Standard letter template
- Internal Monitoring – Documented procedure
- Internal monitoring form – Cross contamination inspections
- Internal Monitoring form (General)
- Cross Contamination Inspection aide memoire
- Food Team meeting minutes 21 August 2014, 5th February and 1st April 2015
- Food Sampling programme 1st April 2015 to 31st March 2016 and 2014-15
- System Administration Guide to Uni-form V7.6
- NHS Greater Glasgow and Clyde Standard Operating procedure “Response to Notifications”
- NHS Greater Glasgow and Clyde Outbreak Control Plan (Updated April 2012)

(2) Officer interviews

The following Officers were interviewed:

- Audit Liaison Officer
- Authorised Officers who carried out the most recent inspection at the two premises selected for a verification visit.

Opinions and views raised during Officer interviews remain confidential and are not referred to directly within the report.

(3) On-site verification visits

A verification visit was made with the Authority’s Officers to two local food businesses. The purpose of the visit was to verify the outcome of the last inspection carried out by the Local Authority and to assess the extent to which enforcement activities and decisions met the requirements of relevant legislation, the Food Law Code of Practice

(Scotland) and other official guidance, having particular specific regard to Local Authority checks on FBO compliance with Regulation (EC) No 852/2004 and the Food Hygiene Information Scheme.

ANNEXE C

Glossary

Audit	Audit means a systematic and independent examination to determine whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.
Authorised Officer	A suitably qualified Officer who is authorised by the Local Authority to act on its behalf in, for example, the enforcement of legislation.
E. coli	<i>Escherichia coli</i> microorganism, the presence of which is used as an indicator of faecal contamination of food or water. <i>E. coli</i> 0157:H7 is a serious food borne pathogen.
Food Law Code of Practice (Scotland)	of Government Codes of Practice issued under Section 40 of the Food Safety Act 1990, Regulation 24 of the Food Hygiene (Scotland) Regulations 2006 and Regulation 6 of the Official Feed and Food Controls (Scotland) Regulations 2009, as guidance to Local Authorities on the enforcement of food legislation.
Food hygiene	The legal requirements covering the safety and wholesomeness of food.
Food Standards Scotland	<p>FSS is the public sector food body for Scotland and 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.</p> <p>FSS develops policies, provides policy advice to others, and protects consumers through delivery of a robust regulatory and enforcement strategy.</p> <p>See more at: http://www.foodstandards.gov.scot/</p>
Framework Agreement	<p>The Framework Agreement consists of:</p> <ul style="list-style-type: none">• Chapter One Service Planning Guidance• Chapter Two The Standard• Chapter Three Monitoring of Local Authorities• Chapter Four Audit Scheme for Local Authorities <p>The Standard sets out the Food Standards Scotland's expectations on the planning and delivery of food law enforcement.</p> <p>The Monitoring Scheme requires Local Authorities to submit an annual return to Food Standards Scotland on</p>

their food enforcement activities i.e. numbers of inspections, samples and prosecutions.

Under the **Audit Scheme** Food Standards Scotland will be conducting audits of the food law enforcement services of Local Authorities against the criteria set out in The Standard.

Full Time Equivalents (FTE)	A figure which represents that part of an individual Officer's time available to a particular role or set of duties. It reflects the fact that individuals may work part-time, or may have other responsibilities within the organisation not related to food enforcement.
HACCP / FSMS	Hazard Analysis and Critical Control Point – a food safety management system (FSMS) used within food businesses to identify points in the production process where it is critical for food safety that the control measure is carried out correctly, thereby eliminating or reducing the hazard to a safe level.
LAEMS	Local Authority Enforcement Monitoring System is an electronic System used by local authorities to report their food law enforcement activities to Food Standards Scotland.
Member forum	A local authority forum at which Council Members discuss and make decisions on food law enforcement services.
Risk rating	A system that rates food premises according to risk and determines how frequently those premises should be inspected. For example, high risk premises should be inspected at least every 6 months.
Service Plan	A document produced by a Local Authority setting out their plans on providing and delivering a food service to the local community.

Inverclyde Council Official Food Controls Service Plan 2015/16

1. Service Aims and Objectives

<p>1.1 Aims and Objectives</p>	<p>The aims of the Inverclyde Council's Safer & Inclusive Communities Service in relation to Food Control are</p> <ul style="list-style-type: none"> • Following the completion of the implementation of the FSA's cross contamination guidance in 2014 to return to a risk based inspection programme in 2015/16 in line with the requirements of the 2014 Food Law Code of Practice. The programme will include the continued phased re-integration of premises not inspected whilst the focus of the inspection programme was on cross contamination. • To work with local businesses in as open and transparent a manner as possible in order to help them where necessary, improve the safety of food and level of compliance with relevant legislation in line with the service's Food Safety & Standards Enforcement Policy. All enforcement will be in line with the principles of Better Regulation and will aim to adhere to the Scottish Regulators' Strategic Code of Practice. • To respond efficiently to complaints about food quality, food premises, food labelling or food composition, originating from premises or purchases made within Inverclyde. • To play a full role in the West of Scotland Food Liaison Group and to co-operate in full with the Scottish Food Enforcement Liaison Committee, Food Standards Scotland and The Royal Environmental Health Institute of Scotland to improve consistency and best practice in the role of food enforcement among Scottish local authorities. • To continue to provide advice and guidance on all food safety matters to the businesses of Inverclyde.
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<p>1.2 Links to corporate objectives and plans</p>	<p>In carrying out the above effectively the service will contribute to the following wellbeing outcomes for Inverclyde's Citizens from the Inverclyde Alliance's Single Outcome Agreement 2012-17</p> <p>Safe Protected from abuse, neglect or harm and supported when at risk. Enabled to understand and take responsibility for actions and choices. Having access to a safe environment to live and learn in.</p> <p>Healthy Achieve high standards of physical and mental health and equality of access to suitable health care and protection, while being supported and encouraged to make healthy and safe choices.</p>
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2. Background

<p>2.1 Profile of the Local Authority</p>	<p>Inverclyde covers an area of 61 square miles stretching along the south bank of the estuary of the River Clyde. Inverclyde is one of the smaller local authorities in Scotland. The main towns of Greenock, Port Glasgow and Gourock sit on the Firth of Clyde. The towns provide a marked contrast to the coastal settlements of Inverkip and Wemyss Bay, which lie to the south west of the area, and the villages of Kilmacolm and Quarrier's Village which are located further inland.</p> <p>Demographic trends have shown a marked decrease in population in recent years with the majority of those leaving being young. Overall this is likely to result in a far higher proportion of over 60s in the population in the future. Inverclyde also has substantial areas of deprivation.</p> <p>In the 2012 Scottish Index of Multiple Deprivation 14 (12.7%) of Inverclyde's 110 datazones were in the 5% most deprived datazones in Scotland. Of the seven SIMD domains (Income, Employment, Health, Education, Housing, Access and Crime) rankings for Health and Employment were worst.</p>
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<p>2.2 Organisational Structure</p>	<p>A full Council Structure is attached as Appendix 1. Specifically however the food service is part of the Food & Health Team with responsibilities as follows:</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> <p>Corporate Director Education, Communities and Organisational Development – Patricia Cassidy</p> </div> <p style="text-align: center;">↓</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> <p>Head of Safer & Inclusive Communities – John Arthur (Head of Food Service)</p> </div> <p style="text-align: center;">↓</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> <p>Health Protection Manager – Martin McNab</p> </div> <p style="text-align: center;">↕</p> <div style="border: 1px solid black; padding: 5px;"> <p>Food & Health Team leader – Michael Lapsley (Lead Officer Food Safety & Standards)</p> </div> <p>As can be seen from the above Safer & Inclusive Communities is part of the Education, Communities & Organisational Development Directorate reporting to the Education & Communities Committee.</p>
<p>2.3 Scope of the Feed and Food Service</p>	<p>The Food and Health Team within Safer Communities is responsible for delivering all aspects of Food Safety and Standards enforcement within Inverclyde. The team also has responsibility for Trading Standards (including Animal Feed), Port Health, Infectious Disease Control, Animal Health and Private Water Supplies.</p> <p>The Food & Health Team consists of a Team Leader, two Environmental Health Officers (both also working with the Environment & Safety Team), a Food Safety Officer, a Senior Trading Standards Officer and a Trading Standards Officer.</p> <p>With the exception of the Trading Standards staff all are involved in Food Safety and Standards enforcement. The TSOs are involved in feed enforcement. One other EHO from another team contributes approximately 10% of her time to food enforcement.</p>

<p>2.4 Demands on the Feed and Food Service</p>	<p>Within Inverclyde at 1st April 2015 there were 667 food premises of various types and sizes over which it has enforcement responsibility.</p> <p>This includes 2 premises approved under product specific legislation giving each of these businesses a unique Approval Number. Both are involved in meat products production with one producing meat preparations.</p> <p>Of the 667 premises by classification on 1 April 2015 there are 3 primary producers, 16 manufacturers/packers, 9 distributors, 159 retailers, 154 restaurants & caterers, 108 caring establishments, 13 hotels/guest-houses, 23 mobile food units, 79 pubs/clubs, 71 take-aways and 32 schools/colleges.</p> <p>The food service is delivered from 40 West Stewart Street in Greenock and operates during normal working hours Monday to Friday. In the event of a food related emergency senior members of Safer & Inclusive Communities' staff are contactable out of hours. Contact numbers are available to both Food Standards Scotland and Greater Glasgow & Clyde Health Board.</p> <p>There are no significant additional external factors impacting on the service. The percentage of business owners whose first language is not English is no greater than average. The number of manufacturers is small and, although Greenock has a busy port, at present no food or feed is imported.</p> <p>Possibly the most significant factor which could affect the authority's ability to deliver its food and feed control programme is the relatively small size of the service. This means that a large outbreak or event could have a disproportionate effect on the service. There is an agreement between the authorities constituting the West of Scotland Resilience Partnership to provide mutual aid however which should mitigate the effects of any such event.</p>
<p>2.5 Regulation Policy</p>	<p>The Food Service currently operates in line with a Food Safety Enforcement Policy to ensure that compliance with food law is achieved in a proportionate, transparent and consistent manner. The Enforcement Policy was revised in 2015 following the completion of the service's programme of enforcement of the FSA's Cross Contamination Guidance.</p>

3. Service Delivery

3.1 Interventions at Food and Feeding stuffs establishments	<p>Programmed Food Hygiene interventions for 2015-16:</p> <table border="1"><thead><tr><th>Risk Rating</th><th>Count</th></tr></thead><tbody><tr><td>A</td><td>5</td></tr><tr><td>B</td><td>71</td></tr><tr><td>C</td><td>142</td></tr><tr><td>D</td><td>32</td></tr><tr><td>E</td><td>3</td></tr><tr><td>Missed C's and D's</td><td>44</td></tr><tr><td>Grand Total</td><td>297</td></tr></tbody></table>	Risk Rating	Count	A	5	B	71	C	142	D	32	E	3	Missed C's and D's	44	Grand Total	297
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<p>Food Hygiene Interventions Completed 2014-15</p> <table border="1"><thead><tr><th>Risk Rating</th><th>Count</th></tr></thead><tbody><tr><td>Unrated</td><td>63</td></tr><tr><td>A</td><td>29</td></tr><tr><td>B</td><td>70</td></tr><tr><td>C</td><td>156</td></tr><tr><td>D</td><td>39</td></tr><tr><td>E</td><td>9</td></tr><tr><td>Grand Total</td><td>366</td></tr></tbody></table>	Risk Rating	Count	Unrated	63	A	29	B	70	C	156	D	39	E	9	Grand Total	366	
Risk Rating	Count																
Unrated	63																
A	29																
B	70																
C	156																
D	39																
E	9																
Grand Total	366																

Programmed Food Standards Interventions 2015/16

Risk Rating	Count
A	5
B	5
C	53
Grand Total	63

Food Standards Interventions Completed 2014-15

Risk Rating	Count
Unrated	67
A	3
B	64
C	152
Grand Total	286

n.b. the programme for 20115/16 is a significant underestimate as there will be a substantial number of missed inspections to be picked up as part of the general inspection backlog.

3.2 Feed and Food Complaints

The food service deals with a varying number and type of food complaints from both members of the public about locally purchased food and from other enforcement authorities regarding locally produced food.

All complaints are handled in line with our documented policy and are thoroughly investigated. The majority of complaints do not result in formal action; however they maybe referred to the procurator fiscal in accordance with the Enforcement Policy.

Last year the service dealt with 54 complaints of which 43 related to the hygiene of food premises.

<p>3.3 Home Authority Principle and Primary Authority Scheme</p>	<p>At present Inverclyde Council has formal Home Authority agreements with two businesses based in the area. Informal arrangements however exist with a number of other businesses and we would always seek to respond to all enforcing authority questions on food produced and labelled within Inverclyde in accordance with our enforcement policy.</p>
<p>3.4 Advice to Business</p>	<p>The food service is proactive in advising businesses in the course of normal contacts. It is also happy to visit sites of proposed businesses on request to advise on layout and structural finishes. The service operates an open door policy and is happy to advise on any food related matters including labelling.</p>
<p>3.5 Feed and Food Sampling</p>	<p>Inverclyde participates in sampling programmes instituted by a number of bodies, such as the West of Scotland Food Liaison Group.</p> <p>All of the analysis is carried out by Glasgow Scientific Services which is a NAMAS accredited laboratory.</p> <p>Inverclyde has a documented policy for sampling. An annual sampling programme is produced as part of the policy.</p> <p>The chemical samples included food samples, food complaints and radiation samples. Sampling is carried out to monitor food poisoning incidents, complaints, manufacturing processes and general hygiene trends. It is strongly based on locally produced foods.</p> <p>Although Inverclyde has a major port in the Greenock Ocean Terminal, at the time of writing there is no food imported to the UK through the port. Were this to change a significant amount of our sampling effort would be redirected to address this.</p> <p>In 2014/15 approx 70 food samples were taken for bacteriological quality and 135 for composition.</p>
<p>3.6 Control and Investigation of Outbreaks and Food</p>	<p>The Food Section liaises with Greater Glasgow & Clyde Health Board through the Consultant in Public Health Medicine in the investigation of food poisoning incidents within Inverclyde. A protocol is in place dealing with the investigation of isolates. In case of a major outbreak an outbreak control plan is in</p>

<p>Related Infectious Disease</p>	<p>place.</p> <p>A major outbreak of food poisoning would inevitably have a long term impact on the day to day work of the section given the relatively low staff numbers. Mutual aid agreements with other authorities in the West of Scotland Resilience Partnership should mitigate the effects of this.</p>
<p>3.7 Feed/Food Safety Incidents</p>	<p>Inverclyde is part of an electronic alert system operated by Food Standards Scotland. Contact can be made with the Head of Service or Service Managers on a 24 hour basis. The Food Section is committed to fully implement the Code of Practice with regard to food safety incidents. Incoming Food Alerts are automatically cascaded to all members of the team.</p>
<p>3.8 Liaison with Other Organisations</p>	<p>To ensure that enforcement action taken by Inverclyde's Food Section is consistent with those of neighbouring authorities, the Food Section is involved with the following organisations; the West of Scotland Food Liaison Group which represents 13 of Scotland's 32 authorities and includes representatives from Glasgow Scientific Services, through the liaison group with the Scottish Food Enforcement Liaison Committee (SFELC) and Food Standards Scotland.</p> <p>There is close Liaison with Greater Glasgow & Clyde Health Board and the other authorities in its area at the Public Health (Health Protection) Liaison Working Group. This group include representatives from Animal Health, SEPA, Scottish water and Health Protection Scotland.</p>
<p>3.9 Feed and Food Safety and Standards promotional work, and other non-official controls interventions</p>	<p>Over 2014/15 there was no capacity to carry out promotional work primarily owing to the conclusion of the Cross Contamination Strategy and the associated backlog of work.</p>

4. Resources

4.1 Financial Allocation	<p>Staffing Costs for 2015-16 - £114750</p> <p>Travel & Subsistence - £1500 (estimated)</p> <p>IT – Food & Feed enforcement's share of annual licence fees is estimated at £2,000 per annum.</p> <p>Sampling – Overall the Service spent approximately £67000 on sampling in 2014/15 of which approximately 65% or £43000 was spent on food sampling. In 2015/16 £91000 is budgeted for sampling for the service as a whole.</p> <p>Other costs including property costs, printing etc. estimated at £10000.</p> <p>No growth is expected in 2015/16 beyond any increase in salary costs so the estimated cost of the service in 2015/16 is approximately £173000 (assuming 1% salary cost increase).</p>
4.2 Staffing Allocation	<p>At the time of writing there are a total of 2.5 qualified FTEs working in Food. These are made up of a proportion of the working time of 5 staff in total. Of those 5, 3 are authorised at the highest level (to serve EPN/HEPN etc) and 2 at a medium level (service of IN/HIN/RAN etc).</p> <p>A further 0.2 FTE contribute to the service as support staff/management.</p>
4.3 Staff Development Plan	<p>All staff members attend external events for CPD as far as availability allows. Being a relatively small service, staff CPD in food & feed enforcement can largely be gained through a combination of FSS low cost training events and internal staff development e.g. consistency exercises. Full records are kept of staff training and these are reviewed regularly to ensure that staff with a need to attend particular courses (e.g. FSS HACCP auditing etc.) are identified and given preference when places become available.</p>

5. Quality Assessment

5.1 Quality assessment and internal monitoring	The Food Section currently has a system for monitoring the quality of food hygiene inspection. These are reviewed on a regular basis to take account of any changes in external factors, e.g. Code of Practice requirements. As a small authority, the use of a formal quality system is considered to require a disproportionate amount of officer time and expense to achieve any benefit.
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6. Review

6.1 Review against the Service Plan	It is our intention to review service delivery and report on performance to committee on the 2015/16 Service Plan either via the directorate plan or via a separate report.
6.2 Identification of any Variation from the Service Plan	The Team Leader Food and Health will identify any variance from the plan and identify the reasons e.g. large food poisoning outbreak or national food crisis.
6.3 Areas of Improvement	Where a review of the service plan highlights an area for improvement this will be incorporated in the plan for the following year.

Appendix 3 – Primary Head Teachers’ Consultation May 2015

18/20 schools responded

1.	Yes	No
Did you use the budget downloaded to you in 2014/15 for Outdoor Education?	18	0*

*nb one school carried forward to current term

2.	Subsidising P6 residential trip	Subsidising P7 residential trip	Other	Details if Other:
If yes to 1. above what was the budget used for?	12*	3*	4	2 Day non-residential trip to Inverclyde Sports Centre (Largs). Full day of outdoor education activities at Castle Semple. Visit to Xscape (2).

*nb one school used the budget to subsidise both P6 and P7 trips

3.	Used for purposes other than outdoor education	Budget not spent but carried forward	Other	Details if Other:
If no to 1. above what was the budget used for?	N/A	N/A	N/A	

4.	Yes	No	Unsure	Comments:
<p>Would you be in favour of outdoor education being delivered through a mountain bike programme at the new Rankin Park facility?</p>	11	3	4	<p>Yes - If there were also other opportunities as not all would be able /want to participate in this type of activity.</p> <p>Yes - Good to keep our options open. May appeal to a number of pupils.</p> <p>Yes - Sounds a good facility – would ensure consistency for all pupils.</p> <p>No- Would prefer budget to be used towards outdoor residential experiences.</p> <p>No - Outdoor residential trip provides the opportunity for many different activities and an away from home experience.</p> <p>Yes – If fully funded including transport? Better from parents point of view if all schools the same.</p> <p>Yes – Would still like to have opportunities for residential experiences.</p> <p>Yes – Obviously the cost of transport would have to be built into this.</p> <p>Unsure – We would prefer to have the budget to use for another P6 trip next year. We would also be interested in using the facility if that was an additional option.</p> <p>Unsure – Not at the expense of funds for a residential. Absolutely yes if it didn't affect this.</p> <p>Yes – If fully funded resourced and staffed.</p> <p>No – Could be better used on a school by school basis. Greatly helps our pupils to access Outdoor Education especially those who would struggle financially.</p> <p>Unsure – I have concerns about the residual budget being put towards this and not having the facility to subsidise an outdoor residential experience. If it was an either/or choice I would opt to maintain the residential experience.</p> <p>Yes- This could form part of our outdoor Education programme with other elements. Transport costs are prohibitive.</p> <p>Unsure – I think it is important that children are offered a wide variety of outdoor opportunities. Cycling is just one and not all children would identify it as their favourite.</p>