

Agenda Item	20
Report No	PLA 35/17

HIGHLAND COUNCIL

Committee: Places Committee

Date: 16 August 2017

Report Title: Environmental Health Operational Plan 2017/18

Report By: Director of Community Services

1. Purpose/Executive Summary

- 1.1 This report invites Members to approve the Environmental Health Operational Plan 2017/18.
- 1.2 The Plan details the objectives for the whole of the Environmental Health team, including those areas not covered by the Community Services Service Plan. The report is published to meet statutory requirements and provide Councillors, members of the public and businesses with information on the team.

2. Recommendation

- 2.1 Members are invited to approve the Environmental Health Operational Plan 2017/18 as detailed in **Appendix 1**.

3. Background

- 3.1 Members will be aware that this Committee approves the Community Services Service Plan which sets out the general objectives for the Service. Environmental Health also submits a General Operational Plan for Member approval. The Plan provides Members with information on the objectives for the whole of Environmental Health including those areas not covered by the Service Plan. The report is published to provide members of the public and businesses with background information on the function.
- 3.2 Environmental Health carried out a wide range of statutory duties on behalf of the Council with the general remit to protect and improve public health. This includes:
- a) public health protection, which includes private water supplies, nuisances, smoking in public places, port health, communicable disease investigation (e.g. Food-borne / waterborne disease, legionnaires Disease);
 - b) food safety, covering food hygiene, food labelling, and food export certification;
 - c) enforcement and advisory role for Health & Safety at Work legislation;
 - d) Private Sector Housing, including sub-standard housing, improvement and repairs grants, closing and demolition orders, Houses in Multiple Occupation and housing defects;
 - e) pollution control, which includes noise control and local air quality management;
 - f) contaminated land, covering the regulatory role for contaminated land prevention through development control, advisory role to other council services on asset transfer and development;
 - g) animal health and welfare, which can include dealing with foot and mouth disease, anthrax, avian flu and bluetongue;
 - h) licensing duties which include a general enforcement role for activities licensed under the Civic Government legislation and an administrative and enforcement role for licensing of caravan sites, venison dealers, animal boarding establishments, pet shops, zoos, cinemas, riding establishments, theatres, sports grounds and dangerous wild animals; and
 - i) dog control, pest control, litter education and enforcement, fly-tipping, waste duty of care, and abandoned vehicles.
- 3.3 The Operational Plan for 2017/18 is provided in **Appendix 1**.

4. Key objectives

- 4.1 The Plan contains challenging objectives for Environmental Health to contribute to the aims of a healthier and safer Highlands. These are listed in appendix 2 of the Plan. Key objectives are summarised below:
- a) continue general review of approach to work to improve effectiveness and efficiency (redesign);
 - b) maintain performance in key Performance Indicators particularly on food safety and private water supplies;
 - c) review and implement the Joint Health Protection Plan for the area in conjunction with NHS Highland;
 - d) work with the Food Standards Scotland on new approach to Approved Establishments (manufacturers of products of animal origin); and
 - e) taking forward specific projects on issues such as health and safety at work, abandoned vehicles, dog control (including barking dogs), and private sector housing.

5. Implications

- 5.1 Resource – no specific resource implications as a result of the new plan
- 5.2 Legal – As reported previously to Committee, resources do not permit all statutory responsibilities to be implemented as per statutory/official guidance. This leaves the Council open to possible sanction by external agencies/Government. The team ensures resources are committed on areas of greatest public health significance with work being appropriately prioritised.

For further background see report 8 to Community Services Committee 5/11/15:
http://www.highland.gov.uk/meetings/meeting/3585/community_services_committee

- 5.3 Community (Equality, Poverty and Rural), Climate Change/Carbon Clever, Gaelic – no specific implications as a result of the new plan.
- 5.4 Risk - The operational plan contains actions that control risk associated with item CMS1 in the risk register 'Consequences of serious food and water borne disease outbreak'.

Designation: Director of Community Services

Date: 28/7/17

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APPENDIX 1



Community Services Environmental Health Operational Plan 2017/18

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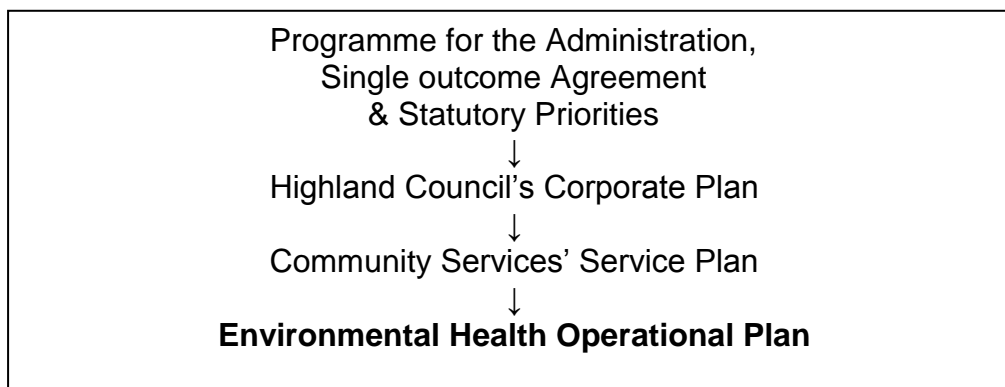
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BACKGROUND AND CONTEXT

1. Purpose, Timeframe and Monitoring

- 1.1 The Environmental Health Team of Community Services provides regulatory and advice functions within the Highland Council area. This Operational Plan outlines the Environmental Health approach to delivering all aspects of regulatory and advice functions for the 2017/18 financial year. The plan forms an important part of the Service's processes to ensure national priorities and standards are addressed and delivered locally.
- 1.2 The plan fits into the set of plans the Council has created to ensure its corporate objectives, the Programme for the Administration and Single Outcome Agreement are fulfilled. The plans integrate as follows:



- 1.3 **Appendix 3** contains a Food Safety Team Plan that provides specific information on the Council's role as Food Authority. A specific food plan is required to meet the requirements of the statutory Food Law Code of Practice issued by Food Standards Scotland.
- 1.4 The implementation of the Plan will be monitored by the Environmental Health management team and a review of the Plan will be taken to Committee in 2018/19.

2. Structure and resources

- 2.1 Environmental Health has 63 posts with a full-time equivalent of 57. The Service operates 3 operational areas and works through 7 offices throughout the area as shown below:

Operational Area	Offices
North Team - Caithness, Sutherland	Wick, Golspie
West Team - Skye and Lochaber	Portree, Fort William
Mid-Highland Team – Ross & Cromarty, Inverness, Nairn, Badenoch and Strathspey	Dingwall, Inverness and Kingussie

The Service is progressing with the mobile and flexible working initiative and increasing numbers of officers are working from home and hot-desking in various Council venues.

- 2.2 A structure diagram is provided in **Appendix 1**.
- 2.3 The Service had a revenue budget of £2.05m for 2016/17.

3. Roles and responsibilities

- 3.1 Environmental Health is the branch of public health which deals with all aspects of the natural and built environment that may affect public health, together with animal welfare and licensing duties. The main functions include:
- public health protection, which includes water supplies, nuisances, smoking in public places, port health, communicable disease investigation e.g. food-borne / waterborne disease, legionnaires disease;
 - food safety, covering enforcement and advisory role for food hygiene, food labelling, and export certification;
 - enforcement and advisory role for Health & Safety at Work legislation;
 - private sector housing, including sub-standard housing, improvement and repairs grants, closing and demolition orders, houses in multiple occupation and housing defects;
 - pollution control, which includes noise control and local air quality management;

- contaminated land covering the regulatory role for contaminated land prevention through development control, advisory role to other council services on asset transfer and development;
- animal health and welfare which can include dealing with foot and mouth disease, anthrax, avian flu and bluetongue;
- licensing duties which include a general enforcement role for activities licensed under the civic government legislation and an administrative and enforcement role for licensing of caravan sites, venison dealers, animal boarding establishments, pet shops, zoos, cinemas, theatres, sports grounds and dangerous wild animals;
- dog control, pest control, litter education and enforcement, abandoned vehicles; and
- assisting with civil contingencies and emergency planning, with specific responsibilities regarding recovery from incidents.

3.2 Much of the work is preventative and the team has an important role in ensuring the Highlands maintains its reputation of a safe and healthy place in which to live, work and holiday. We aim to support local businesses by providing advice on appropriate regulations and ensuring any regulatory activity follows the five principles of better regulation: Proportionate, Consistent, Accountable, Transparent and Targeted.

3.3 An approximate summary of officers allocated against function is provided below:

Function	Full time equivalent
Food Hygiene	11.00
Food Standards	2.00
Health & Safety at work	2.00
Private Water supply	4.00
Animal Health & welfare	2.10
Licensing	3.10
Public Health	5.00
Housing	6.00
Contaminated Land	1.90
Pollution control	3.00
Litter, dog and pest control, abandoned vehicles	9.00
General management	3.40
Dedicated IT support	1.40
Contract - Official Controls - shellfish sampling	3.10

57.00

4. Demands

4.1 The workload for the environmental health can be simplistically split into proactive (programmable) work and reactive work.

4.2 Proactive work

4.2.1 The team carry out proactive/programmable work under certain legislation. The work is risk based and intelligence driven. Often specific proactive work is carried out in Partnership with other agencies such as Police Scotland, SEPA, HMRC and Scottish Fire and Rescue Service.

A summary of the some of the **proactive** demands is provided below.

4.2.2 Food Safety

Responsible as statutory Food Authority for approximately 4,500 food businesses in Highland. Resources allow around 1,000 programmed inspections of premises in Highland per year focussed on those presenting highest risk. Approximately 250 proactive food samples are taken as part of national surveys.

4.2.3 Private Water Supplies

In Highland the population served by private supplies is estimated at 14%. There are currently 759 "Type A" supplies (commercial or large private water supplies) that are registered and subject to mandatory risk assessment and monitoring and intervention by the Council. It is estimated these supplies serve 3,000 properties. Each supply is visited annually as part of a proactive programme to ensure they meet the required standard.

There are also 1,651 "Type B" (smaller private water supplies) registered whereby our duty is to offer advice and assistance and discretionary powers in respect of sampling. It is estimated these supplies serve 2,300 properties.

4.2.4 Health and Safety at Work

Enforcement of Health and Safety at Work legislation is divided between the Health and Safety Executive (HSE) and local authorities. HSE is responsible for workplaces including factories, farms, building sites, schools, hospitals and offshore installations. The Council cover businesses including offices, shops, hotels, leisure premises, caterers, nurseries and clubs. In Highland the Environmental Health team has responsibility for over 5,000 businesses in Highland.

In line with national guidance proactive work is carried out based on intelligence and focussed on those sectors and activities with the most serious risks or where the risks are least well-controlled. Recent initiatives have looked at fixed LPG installations and work place transport risks. Around 80-100 targeted inspections are carried out per year.

4.2.5 Animal Health and Welfare

Officers carry out proactive inspections of animal markets and other sales, and Assembly Centres to ensure compliance, in particular with biosecurity (vehicles, premises and people), livestock identification, welfare, transport, licensing and record keeping. Around 150 inspections are carried out per year.

4.3 Reactive work

4.3.1 The team deals with significant number of incidents and major investigations in addition to the more routine service requests from the public and businesses (Approximately 7,000 per year).

The summary below of service requests is based on data from 2016.

Category	count	Category	count
Animal Health & Welfare	554	Air Quality Monitoring Unit Work	38
Dog fouling	600	National Assistance Burial enquiries	25
Stray dogs	267	Exhumation/re-internment enquiry	3
Aggressive dogs/dog bites	140	Home Burial enquiry/request	5
Planning general consultation	395	Housing grant enquiry	379
FOI request	110	Housing general enquiry	23
Abandoned vehicles	300	Housing complaint - dampness	51
Accident reports	123	Housing complaint - structural	2
H&S complaints	89	Housing complaint - other	30
H&S request for info	48	Housing visit for immigration	11
Smoking ban complaint	4	Request for Housing Condition	108
Licensing enquiry	140	Pest control requests	162
Licensing Consultation	460	Food Premises Registration	216
Licensing complaint	44	food safety enquiry	371
Noise enquiry	138	Fish/Shellfish Export Cert	636
Noise complaint	313	Food (non Fish/Shellfish) Export cert	23
Dirty house complaint	16	Approval/Lic/Auth application	2
Foul Odours	67	Shellfish Registration Document	55
Dust Complaint	5	Complaint - Food (Unfit)	80
Smoke Complaint	72	Complaint - Hygiene of Premises	84
General Nuisance - Other	172	Complaint - Food Standards (e.g.labelling)	13
Light Nuisance	7	Infectious disease enquiry/rep	21
Insect Nuisance	8	Infectious disease notification	139
Choked/Defective Drain / Sewer	43	Outbreak investigation	3
Choked/Defective Septic Tank	23	Port Health enquiry/consultation	1
Blue Green Algae Alert	8	Ship Sanitation Certificate Request	14
Beach Sampling Enquiry/Activity	2	Ship/aircraft request for sample	10
Radon query	1	Private water supply enquiry	142
Plant cmplt/query (injurious weeds)	2	Private water supply request for sample	77
Fly-tipping	70	Public water supply query/cmplt	10
Whale/animal carcass	19		

TOTAL

6,974

4.3.2 Significant incidents can take considerable time to investigate and conclude as often complex issues involved. For example, a prosecution can take the equivalent of 4 weeks of one officer's time to investigate including interviewing witnesses and then to prepare a detailed case for the Procurator Fiscal.

5. Risk Management

5.1 The team manages significant risks in relation to the consequences of serious foodborne or waterborne disease outbreak. This is identified in the Corporate Risk Register (CS1).

PRIORITIES AND OBJECTIVES

6. Priorities and challenges 2017/18

6.1 Over the next year the team will be taking forward a wide range of projects and these are listed in in **Appendix 2**. These include:

- a) continue general review of approach to work to improve effectiveness and efficiency (redesign);
- b) maintain performance in key Performance Indicators particularly on food safety and private water supplies;
- c) review and implement the Joint Health Protection Plan for the area in conjunction with NHS Highland;
- d) work with the Food Standards Scotland on new approach to Approved Establishments (manufacturers of products of animal origin);
- e) taking forward specific projects on issues such as health and safety at work, abandoned vehicles, dog control (including barking dogs), and private sector housing; and
- f) continuing engagement with the Council's improvement process including mobile working.

7. Objectives and performance indicators

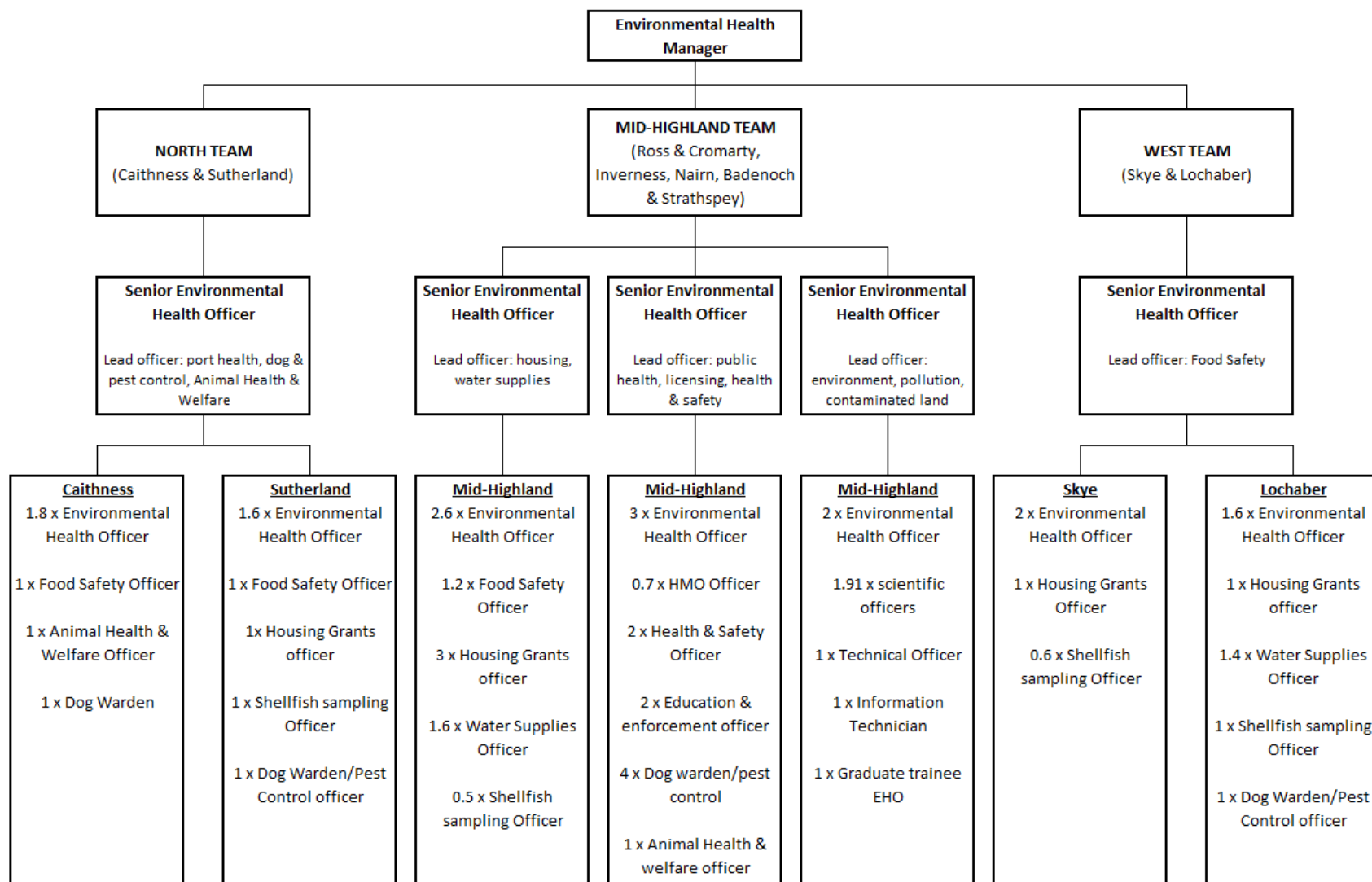
7.1 Environmental Health has a number of objectives and performance results that originate in the Community Services Service Plan and these are summarised below:

Id.	8.05
Additional Service Commitment	Ensure high risk food premises are inspected for food hygiene purposes.
Key Performance Results	% of high risk food businesses inspected for Food Hygiene purposes (IPI)
Risk	CMS1

Id.	8.06
Additional Service Commitment	Ensure Risk Assessment and sampling of all relevant Private Water Supplies to reduce risk of water borne disease.
Key Performance Results	% of high risk Private Water Supplies inspected and sampled (IPI)
Risk	TEC 4

7.2 The team is also participating in the APSE Performance Benchmarking Network for Environmental Health.

Appendix 1 – Environmental Health Team structure



Appendix 2

Specific activity projects for 2017/18

1. Health and Safety at work

- 1.1 To devise and deliver a programme of health and safety interventions based upon Local Authority Circular (LAC67/2) (rev6) and the list of national priorities published by the HSE. The programme shall consist of work to deliver those national priorities set by HSE, work to deliver local priorities and an inspection programme that meets the requirements of the National Local Authority Enforcement Code.

In 2017/18, three projects are being undertaken:

1. **LPG fixed pipework:** This work originates in the Stockline Plastics factory explosion in Glasgow in 2004 where there were 9 deaths and 33 people injured. In 2012/13 officers took part in a joint LA/HSE exercise, and a significant number of hotels and other premises were visited and assessed. A number of notices served. HSE have provided further information and visits to a further 36 hotels in the area will be carried out to check LPG pipework. The general safety of the entire LPG installation will also be reviewed during these visits.
 2. **Sunbeds:** Following complaints in 2016/17, a survey of all licensed sunbed operators will be carried out to assess standards and bulb strength. Work will also carried out to identify any unlicensed operators.
 3. **Riding establishments:** Following local knowledge and incident investigation, it was felt as an addition to Licence inspections at Horse Riding Establishments, Highland Council wants to raise awareness of Health and Safety Legislative requirements within this activity sector. The aim is to contact premises and advise and assist in raising awareness of inherent risk factors and highlighting best practice in Health and Safety to help reduce accidents within this growing leisure market.
- 1.2 Progressing and developing the Primary Authority partnership with Boots the Chemist in relation to occupational health and safety.
- 1.3 Where resources permit, to review existing health and safety enforcement procedures and integrate fully with our APP Civica database
- 1.4 Where resources permit, to devise and implement a regular training programme for all warranted officers to maintain competence in health and safety
- 1.5 Where resources permit, to publish a register online of all relevant HSW information that is commonly requested under FOI legislation. This would include details of all Improvement Notices and Prohibition Notices issued under the HASAWA 1974, and a register of Cooling Towers.

2. Licensing enforcement and administration

- 2.1 To devise and implement new operating procedures based upon the PSIF framework in respect of all licences issued under the Civic Government (Scotland) Act 1982 where Environmental Health (EH) has a remit in terms of the Highland Council's Enforcement Protocol.
- 2.2 To review and amend as necessary the current guidance issued to applicants in respect of all licences issued under the Civic Government (Scotland) Act 1982 where EH has a remit in terms of the Council's Enforcement Protocol.
- 2.3 Where resources permit, to arrange refresher training for all authorised officers in Civic Government Licensing procedures and the associated EH operating procedures.
- 2.4 Review administrative process on miscellaneous licensing to provide a more consistent approach and better utilisation of Civica APP (Flare)
- 2.5 Review and update online miscellaneous licence application forms to reflect changes in current procedures.
- 2.6 Caravan Sites - In preparation for new legislation coming into force :
 - a) conduct an overview of caravan sites and licences issued to date;
 - b) review and update all caravan site premises records and reflect amendments in Civica APP register; and
 - c) review and update current licence conditions to reflect current model standards.

3. Private Water Supplies (PWS)

- 3.1 Achieve 100% on PWS monitoring programme of Type A "commercial" supplies.
- 3.2 Complete the radon sampling of supplies identified by the Drinking Water Quality Inspectorate
- 3.3 Review our PWS register by 1st January 2018 (incl. how we publish the data). The proposed Water Intended for Human Consumption (Private Supplies) (Scotland) Regulation 2017 contains additional information to be included on the register that is not currently recorded.
- 3.4 Continue to work in partnership with NHS Highlands concerning reports of illness and links to PWS.
- 3.5 EH is receiving an increasing number of requests for water tests for house sales/ planning consultation. If resources permit, look to centralise and simplify these requests by Service Centre leading with the provision of an online form and pre-payment system.

- 3.6 If resources permit, promote PWS grants targeting Type B "domestic" premises e.g. social media, liaison with Community Councils, rural community organisations.
- 3.7 If resources permit, develop a PWS record book that relevant persons/users can purchase from the Council to assist with their maintenance and monitoring record keeping. Income generation.

4. Food Safety

4.1 Food Safety – inspection priorities

It must be noted that investigations, or enforcement action, significant to public health will take priority over the targets specified below.

Priority 1: Routine programme

To inspect the following on time for the due date (or within 28 days subject to Senior EHO approval):

- Food hygiene: 100% target for A rated, B rated, Approved premises;
- Food hygiene: 100% target for C, where resources permit with most overdue targeted first;
- Food Hygiene: Where resources permit, most overdue D rated.
- Food Standards: 100% target for A rated;and
- Food Standards: 100% target for B rated that are manufacturers where resources permit.

For all food hygiene inspections in caterers and retailers also carry out a focussed food standards inspection.

Priority 2: Unrated food hygiene premises

Senior EHOs, and officers to ensure all food hygiene premises that are unrated premises are given priority and inspected according to the service procedure and the area list of unrated food hygiene premises is reviewed monthly.

- 4.2 Work with Food Standards Scotland on implementation of all national legislation and standards, in particular implementation of a new method of undertaking official controls in our Approved Establishments (manufacturers of products of animal origin).
- 4.3 Reconfiguring the EH Food Officer resource to optimise delivery of official controls in the approved establishments and other high risk manufacturers. Purpose being to protect public health and support economic development.
- 4.4 Continue to engage with partners within the Scottish Government and Industry to ensure EH Service is structured and financed to best facilitate the needs of the export market.
- 4.5 Continue to support the national working groups, such as the high risk foods working group, tasked with providing clear and consistent guidance for service delivery.

4.6 Engage with council services tasked with provision of food to school age children to help improve diet, nutrition and general wellbeing in school age children within Highland.

5. Private Sector Housing (PSH)

5.1 Review our policy/produce a PSIF procedure on PSH inspection and intervention in relation to both Below Tolerable Standard (BTS) (Housing Act 1998) and the Repairing Standard (Housing (Scotland) Act 2006) and whether HC will adopt the new powers for LA's to refer 3rd party applications to the First Tier Tribunal (formerly PRHP) on behalf of tenants.

5.2 BTS referrals - approx. 95% of these property inspections relate to minor non-compliance with the Repairing Standard. Improve how we record PSH inspection data in FLARE i.e. categories of non-compliance for BTS/repair standard so as to enable future reporting on PSH stock condition and the scoping of future initiatives.

5.3 Expand and develop EH and Landlord Registration Officer relations.

5.4 If resources permit, further engagement with landlords/letting agents - Involvement with Shelter Housing, local commerce.

5.5 If resources permit, develop initiatives to identify poor/sub-standard housing and bring about improvements so as to protect vulnerable tenants from health/safety risks and expose rogue landlords. This links in with item 5.3 and to strengthen relationship with Shelter Housing Landlord officer (currently in post).

5.6 If resources permit, advise/educate home owners on how to repair houses before they need major overhaul and investment. Interface with other agencies/organisations.

5.7 If resources permit, work with housing colleagues on Empty property strategy for PSH - develop a campaign to provide help and support to owners of empty properties to bring them back into use (social media/leaflets/signposting).

6. General Public Health Protection

6.1 Review and implement the Joint Health Protection Plan for the area in conjunction with NHS Highland. The Public Health etc. (Scotland) Act 2008 requires NHS Boards and Local Authorities to produce a Joint Health Protection Plan which provides an overview of health protection (communicable disease and environmental health) priorities, provision and preparedness.

6.2 National assistance funerals - Review and update policy and operating procedures in respect of requests for National Assistance funerals.

- 6.3 Port Health:
- a) provide inspection and sampling provision of the International Health Regulation 2005 in all approved ports in Highland Council and provide support to NHS Highland in respect to ship or aircraft sourced infections; and
 - b) if resources permit, continue to provide training in Port Health to Scottish local authority staff.

7. Local Environment Issues (dog control, pest, abandoned vehicles, litter)

- 7.1 Abandoned vehicles:
- a) review the protocol for abandoned vehicles and update the Highland Council Website to provide advice and information to the public on the service provision of Highland Council;
 - b) if resources permit, provide information of the number of vehicles uplifted by Highland Council onto the Highland Council website for freedom of information enquiries; and
 - c) if resources permit, carry out a focused enforcement initiative of unlicensed vehicles in collaboration with Police Scotland and DVLA within Highland Council.

- 7.2 Litter and Dog Control:
- a) review the operational requirements for the provision of dog control and litter control staff within Highland Council to ensure suitable provision of enforcement through the area;
 - b) where resources permit, carry out focused litter control initiatives with Police Scotland within Inverness city centre;
 - c) where resources permit, carry out anti-dog fouling initiatives in collaboration with local communities; and
 - d) where resources permit, provide information to the Highland Council website on the number of notices issued for dog control and littering for freedom of information enquiries.

- 7.3 Seagulls
- a) review and where necessary update information provided to the public on seagulls (website and information leaflet); and
 - b) if resources permit, develop further campaign material on not feeding gulls.

- 7.4 Inverness City Centre – bin project
Progress project on city centre bins to reduce litter, nuisance and visual impact associated with commercial bins.

8. Pollution

- 8.1 Local Air Quality Management:
- a) continue work on Local Air Quality Management Area Action Plan;
 - b) review local air quality issues in Queensgate, Inverness and wider Local Air Quality Management strategy;
 - c) maintain monitoring facilities at Queensgate, Inverness; Telford Street,

- Inverness; and Strath Viach; and
- d) preparation and submission of annual Local Air Quality Progress Report to the Scottish Government

8.2 Contaminated land:

- a) review information and reports submitted in support of Planning Applications, and liaise with Planning and Building Control Officers to ensure sites are safely redeveloped through the planning process;
- b) promote ways of providing contaminated land advice in-house to other Services within the Council in order to minimise spend on external consultants;
- c) continue to provide support and assistance to other Council departments regarding the City Region Deal development of the Longman site;
- d) assist with other Services within the Council, SEPA and external consultants on the Inverness City Region Deal land regeneration commitment for the remediation of parts of Longman Landfill;
- e) assist and advise when consulted on sites being considered under the Vacant and Derelict Land Fund; and
- f) continue to advise relevant authorities regarding non-radioactive contamination during the decommissioning of the Dounreay Nuclear Facility.

9. Animal Health and Welfare

- 9.1
- a) participate in the Animal Health and Welfare Framework agreement; and
 - b) provide support, through advice and enforcement, to agricultural industry on animal disease issues of concern.

10. General management

10.1 Continue general review of approach to work to improve effectiveness and efficiency (redesign).

10.2 Explore options for more short term partnership/joint initiatives with other agencies.

10.3 Continue internal improvements on internal communications and internal Health & Safety policies including stress management.

10.2 Management Information system - Civica APP (Flare):

- a) review and develop document templates to increase automation in action diaries to reduce officer admin time and speed up processing tasks;
 - b) continue to develop automation of data input (NDL and online forms) to streamline workflow and speed up service enquiry handling process;
 - c) review the miscellaneous licensing module in conjunction with the overall review of miscellaneous licensing administration; and
 - d) continue to develop and implement improvements identified through the Public Service Improvement Framework (PSIF) process.
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Environmental Health: Food Safety Team Plan 2017/18

1. Introduction

- 1.1 The Environmental Health team within Community Services carries out the statutory role of Food Authority within the Highland Council area. This Food Safety Team Plan outlines the Environmental Health approach to delivering all aspects of food regulatory and advice functions.

2. Background Information

2.1 Profile of the Local Authority

- 2.1.1 In geographical terms the Highland Council is the largest Council in Scotland, spanning an area of 26,000 square kilometres – one third of the landmass of Scotland, one eighth of landward Britain. The population of the area is 232,950 (2013 data). Detailed profile information on the Highland area is available here:

http://www.highland.gov.uk/info/695/council_information_performance_and_statistics/165/highland_profile_-_key_facts_and_figures

2.2 Organisational structure

- 2.2.1 The Council operates through five directorates:

- Care and Learning
- Finance
- Corporate Development
- Development and Infrastructure
- Community Services

http://www.highland.gov.uk/info/695/council_information_performance_and_statistics/387/council_structure

- 2.2.2 This Service Plan does not address feed stuffs, as responsibility for this aspect of food legislation lies within the Trading Standards team.

2.3 The Scope of the Food Safety Service

- 2.3.1 Operational responsibility for food safety and food standards enforcement in premises subject to local authority enforcement currently lies totally with Highland Council Community Services. No duties are currently outsourced. Field staff include Environmental Health Officers (EHO) and Technical Officers (Food Safety). Many of these Officers carry out other functions in addition to food safety and food standards work, e.g. several of the EHOs involved in food safety and food standards work also carry out the full range of environmental health duties e.g. health and safety inspections and investigation of public health complaints.

3. Demands on the Food Safety team

3.1 Total businesses:

3.1.1 The team has responsibility for 4,566 food business in the Highland area. This breaks down as follows:

Type of food business	number
Primary producers	331
Manufacturers & packers	346
Importers/Exporters	1
Distributors/Transporters	61
Retailers	768
Restaurants and caterers	3,059
Grand Total	4,566

For comparison, the total number of premises in Scotland (top five):

	LA Name	Total premises
1	Edinburgh (City of)	6,197
2	Glasgow City	6,193
3	Highland	4,566
4	Fife	4,441
5	North Lanarkshire	2,615

3.1.2 **Approved Establishments:** The numbers given in 2.4.1 include premises that have been formally approved. Food Hygiene Legislation requires premises that manufacture and wholesale products of animal origin to be formally approved by their local Food Authority before they start trading.

3.1.3 With 77 approved establishments, Highland has a significant number of approved premises when compared to other Scottish authorities (Aberdeenshire has 113, Argyll & Bute 78, Glasgow City 56 and other authorities have lower numbers). Approved establishments include cheese producers, milk processors, ice cream producers, fish processors and smokers, shellfish dispatch centres, and manufacturing butchers.

3.1.4 The approach to interventions at approved premises and other manufacturers is currently being reviewed in a joint approach by Food Standards Scotland and a Local Authority Officer group. The review is to ensure a risk based approach to these establishments is taken, with detailed review of their specialist food safety management systems. Future interventions at these establishments will require **greater** commitment of staff resources.

3.1.5 **Food Hygiene Information Scheme:** The Council has fully implemented the national Food Hygiene Information Scheme (FHIS). The scheme is designed to provide further information to the public on outcomes of hygiene inspections of food business where the public have access e.g. caterers and retailers. The display of such information at the business is voluntary but all outcomes will be displayed on the web.

3.1.6 Ratings at July 2017:

FHIS rating	number
Pass & Eatsafe	34
Pass	2,272
Improvement Required	406
Pass & Exempt	178
Outwith scope	543
Sensitive – pass	108
Sensitive - improvement required	6

The inspection results for inspected premises are listed on the internet at ratings.food.gov.uk. A searchable mobile phone app is also available.

3.2 Inspection performance

- 3.2.1 The statutory Food Law Code of Practice issued by Food Standards Scotland requires local authorities to carry out interventions in a risk-based approach at the frequencies specified in the Code. Current resources do not permit full compliance with these requirements. Resources are focussed on premises presenting the highest risk to consumers.
- 3.2.2 Inspections of highest risk premises (A & B rated premises) have remained good (90-100% inspection by due date).
- 3.2.3 However, there has been a decrease in total food hygiene inspections carried out by officers in the last few years. There were significant numbers of inspections in 2011 and 2012 in preparation for the launch of the food hygiene information scheme. Since then numbers of total inspections have dropped to around 1000 per year with a lower figure in 2016.


Total Food Hygiene inspections carried out in last 6 years

year	2011	2012	2013	2014	2015	2016
number	1,898	1,752	1,107	965	1,096	883

*Note figures will include multiple inspections of the same business. Does not include data on follow-up, advisory or sampling visits.

- 3.2.4 The drop in inspections in 2016 is due to (a) increasing workload in other key areas (exports, incidents, complaints, service requests); (b) extra time required during inspections to cover significant risk assessments; and (c) reduction in dedicated staff through workload re-structure, and staff turnover.

3.2.5 The table below sets out the total numbers of food businesses in the Highland area categorised by risk in terms of food hygiene (figures 27/7/17). Note the business may be rated high risk due to inherently high risk processes or due to poor standards within the premises.

		Required inspection frequency	Total Number	overdue
Highest Risk	A	every 6m	18	0
	B	every 12m	199	13
	C	every 18m	885	382
	D	every 24m	1378	1061
Lowest risk	E	na	1252	1029
	not yet rated	-	794	-
			4526	

Comments:

- i. The 13 overdue category B rated premises are in one particular area office due to significant staff shortage/work demands. Programme is in place to inspect all overdue B premises in next 3 months.
- ii. Number of overdue category C premises has increased from figure of 95 in 2012. This is due to available resources being focussed on category A & B premises.
- iii. Number of overdue category D premises has increased significantly from figure of 149 in 2012. This is due to available resources being focussed on category A & B premises.
- iv. Category E premises are low risk businesses.
- v. Not yet rated – comments below

3.2.6 Not yet rated

Highland has had a significant number of premises that have yet to be rated. The premises may have never been inspected or have only received a pre-opening advisory visit. Officers assess any new premises that register with us and assign a priority for inspection based on type of food business. Of those yet to be rated, 42 have been given 'high' priority to be inspected and these will be fitted in with monthly inspection programmes. There are a significant number of low risk businesses within the list such as B&Bs, childminders and deer larders.

3.2.7 For comparison, UK data is provided below of number of premises not yet rated (top ten):

	Country	LA Name	Total (including not yet rated & outside)	Not yet rated
1	England	Birmingham	8,341	1314
2	Scotland	Glasgow City	6,193	1154
3	England	Croydon	3,511	856
4	Scotland	Edinburgh (City of)	6,197	770
5	Northern Ireland	Ards and North	1,944	766

		Down		
6	Scotland	Highland	4,566	762
7	England	Camden (2)	3,761	672
8	England	Bristol	4,481	606
9	England	Lewisham	2,628	489
10	Scotland	Aberdeenshire	2,257	466

Comparison data from other authorities in the UK is available at link below:
<https://www.food.gov.uk/enforcement/monitoring/laems/mondatabyyear/interim-enforcement-data-2016/17>

3.3 Planned improvements

3.3.1 To improve performance on inspections of both existing and new food businesses, the team are taking forward a number of initiatives:

- Recruitment using existing resources - funding from vacant posts has been used to recruit a further 1FTE dedicated food safety officer post. This post has been advertised. In addition we have a graduate EHO who should qualify in November whose duties will include food inspections.
- Through managing demands and different approaches to other work - Work is ongoing on reviewing the approach to all EH workload (redesign process). This may allow further EHO time to be committed to food hygiene inspection work.
- Improving efficiency and effectiveness of inspections - Officers are using further electronic communications to improve efficiency of inspections and approaches to inspections are being reviewed to improve effectiveness. In line with our enforcement policy, this will target enforcement work at businesses that ignore or wilfully avoid compliance with hygiene standards.

3.3.2 It must be noted that even with these improvements it will still be a significant challenge to achieve all the workload demands associated with food safety.

3.4 Other demands

3.4.1 The Service recognises its responsibilities for the hygiene inspection of shipping, aircraft and trains. Shipping includes international cruise vessels, merchant shipping, and ferry services that visit or operate in the Highland area.

3.4.2 Highland Council has 23 shellfish production areas containing 37 shellfish harvesting sites. In addition to carrying out routine enforcement work on these sites, the Council successfully bid to secure a 5 year contract to carry out Official Control sampling of these sites on behalf of the Food Standards Agency. As a consequence, officers in the Lochaber, Skye and Lochalsh, Ross and Cromarty, and Sutherland areas will carry out a considerable amount of shellfish sampling. These samples are outwith the routine chemical and microbiological sampling programme covering general foodstuffs produced in the Highlands. Negotiation has commenced with the Food Standards Scotland to extend the current contract from March 2018.

3.4.3 The Service recognises its responsibilities for general surveillance work on imported foods at retail and catering level. This is carried out during routine inspections.

4. Service Delivery

4.1 Food Premises Inspections

4.1.1 Food Hygiene

Food premises have been risk assessed and categorised in terms of the Code of Practice. All premises are entered onto the Flare database and inspection programmes have been generated.

4.1.2 Food Standards

Food Standards work is concerned with composition and labelling of food. Food premises have been risk assessed and categorised in terms of the Code of Practice. All premises are entered onto the Flare database and inspection programmes have been generated.

4.2 Food Complaints

4.2.1 The Service has a policy for dealing with complaints raised regarding food premises enforced by the Service. This covers complaints from the public such as poor hygiene of premises, foreign body contamination, out of date food, food poisoning, pests in premises and poor personal hygiene practices.

4.3 Home Authority Principle

4.3.1 Environmental Health supports the Home Authority Principle, and will assist any other food authority in the UK with an enquiry about food produced in the Highland area.

4.4 Advice to Business

4.4.1 The food team works closely with local food businesses and is happy to offer advice on areas of food safety. Officers are encouraged to attend and provide advice to any food industry meetings in their areas, in addition to offering advice during inspections and on request at our offices.

4.5 Food Sampling

4.5.1 Environmental Health has contracts for bacteriological examination and chemical analysis of foodstuffs with the Public Analyst, City of Edinburgh Council.

4.5.2 In addition to locally targeted sampling, Environmental Health participates in sampling surveys organised by the Scottish Food Enforcement Liaison Committee and in UK food surveys co-ordinated by the FSA.

4.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

4.6.1 Environmental Health is party to the NHS Highland and Highland Council Joint Major Incident Plan for the Investigation of Foodborne and Waterborne disease. The plan is designed to deal with any actual or threatened major outbreak within the Highland Council area. Procedures for investigating

sporadic cases of foodborne diseases are outlined in the Council's Protocol for Investigation of Enteric Disease. Appropriate action for dealing with incidents, where it appears that a food business may be implicated in a case of foodborne disease, is addressed in the Food Safety Enforcement Policy.

- 4.6.2 Standard infectious gastro-enteritis questionnaires are used by all officers for investigation purposes, and procedures are in place for the investigating officer to forward the completed forms to the Consultant in Public Health Medicine at NHS Highland. A copy is also sent simultaneously to the Environmental Health manager. There is on-going close liaison between Environmental Health and the NHS Highland including joint infectious disease outbreak exercises.

4.7 Food Safety Incidents

- 4.7.1 Food Alerts are currently brought to the attention of Environmental Health by email. Food Standards Scotland is aware of the procedure for contacting relevant Officers outwith normal working hours via Council's emergency out-of-hours number.

4.8 Liaison with other organisations

- 4.8.1 Environmental Health takes measures to ensure that enforcement action taken in its area is consistent with that in neighbouring authorities. The lead Senior EHO is a member of the North of Scotland Food Liaison Group (NSFLG) which comprises members of all food authorities in the north of Scotland, i.e. Highland, Orkney, Shetland, Aberdeenshire, Aberdeen, Moray and Western Isles. This group meets regularly to discuss matters of mutual concern and seeks to ensure uniform enforcement action across the entire area. Minutes from all meetings are forwarded to Environmental Health Area offices.
- 4.8.2 The Environmental Health Manager is also a member of the Environmental Health Liaison Group which has representatives from NHS Highland, Animal Health, Scottish Environment Protection Agency, Health Protection Scotland, Scottish Agricultural College and Scottish Water. This group provides a forum for discussion of various environmental health matters including food safety and the presence of NHS Highland and HPS officials provide regional and national perspectives respectively.
- 4.8.3 Environmental Health Officers currently liaise with the Council's Planning and Building Control Service with regard to examining planning applications and building warrant applications which may relate to food safety activities. This provides opportunities for advising planning or building control officials of any relevant problems and also for contacting applicants/agents to discuss proposals and offer advice and guidance.

4.9 Food Safety and Standards Promotion

- 4.9.1 The resources available to Environmental Health are limited and hygiene inspections of high risk food premises have been given priority. Consequently food safety promotion has to be very focussed. Officers promote the Food Hygiene Information Scheme and the Eatsafe awards during routine work.

4.10 Enforcement Policy

4.10.1 The Highland Council has formally adopted an Enforcement Policy that includes food safety.

5. Staff

5.1 Information on finance and staffing is contained within the 2017/18 EH Operational plan.

5.2 Staff Development

Officers are, and will be, encouraged to identify courses in which they have a particular interest. In particular:

- regular Food Working Group meetings provide a focus for discussion of training needs;
- every officer has received in-house training in the operation of the Civica APP database system;
- officers shall be permitted to attend external training courses and seminars and
- the Service has access to online food hygiene training courses

6. 2017/18 Priorities and Targets

6.1 Priorities and targets for food safety are included within the EH operational plan.
