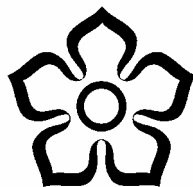


**Leicester City Council
Service Plan for Food Law Enforcement**

2006/2007



Leicester City Council

Regeneration & Culture

Contents

	Page Number
1. Introduction	3
2. Background	3
3. Pro-active monitoring of business standards and conduct	7
4. Resources	14
5. Quality Assessment	16
6. Review Against Service Delivery Plan 2005/6	17
7. Annexes	22
A. Organisational Chart	
B. Resource Assessment food Safety	
C. Resource Assessment Consumer Protection	
D. Sampling Plan Consumer Protection	
E. Sampling Plan Food Safety	
F. Achievements and Variances 2004/05.	

1. Introduction

1.1 Purpose of Service Plan

1.1.1 This Service Plan for Food Law Enforcement outlines how Leicester City Council intends to fulfill its statutory obligations to maintain safety and quality standards for food and animal feedingstuffs in Leicester.

1.2 Aims and Objectives

1.2.1 Leicester City Council's Corporate Plan 2003/6 is to be reviewed in 2007/08 and so connections made here are relevant for 2006/07. These centre around promoting prosperity and new jobs, whilst safeguarding peoples' health and include:

- To prevent ill-health and death arising out of food poisoning from the consumption of contaminated food;
- To ensure that consumers can enjoy good quality food in Leicester and from Leicester producers;
- To prevent economic loss arising out of adulteration and fraud in the production and sale of food;
- To ensure that consumers are able to make informed choices about the food they buy.

1.2.2 The service plan has been designed around the need to deliver the Strategy for Leicester including:

- Promoting the economic vitality of localities.
- Promoting healthier communities and narrowing health inequalities.

2. Background

2.1 Profile of Leicester

2.1.1 Leicester is an urban authority with a population of 283,000. Around 30% of the population is from ethnic communities that originate in the Asian sub-continent. Over 70,000 people commute to work in Leicester every day and the student population of Leicester has now risen considerably over 10,000. It is the largest City in the East Midlands and the tenth largest in the country.

2.1.2 Leicester City Council is a Unitary Authority. It acquired Unitary Status in April 1997.

2.1.3 Leicester is a major regional commercial, manufacturing and retail centre located close to the M1 and M69. It is known better for diversity of its trade than for the dominance of any single industry. Textiles and clothing are important but declining manufacturing industry. The proportion of the workforce employed in manufacturing is higher than the national average of 24% and this reflects the relative importance of this sector in the City's economy.

2.1.4 As of April 2006 Leicester City Council had records on 2500 food businesses premises operating in the city and subject to monitoring by the City Council. A

handful of these are of regional and national significance such as Walkers Snack Foods, Walkers Midlands, Foxes, Blackfriars Bakery, and Kirby & West Dairy. A small number of food businesses distribute, process and sell foods imported from countries outside the EU.

- 2.1.5 Changes in the retail sector have been driven by new retail developments in the City Centre as well as at Fosse Park close to the City's boundary. There has been pressure on the 'corner shop'.
- 2.1.6 Leicester's service sector has grown in recent years and now employs 60% of the workforce. The leisure sector has increased substantially with more restaurants, fast food outlets, pubs and clubs opening up. Particular features of Leicester's food industry are its Asian restaurants. This sector is characterised by a high turnover in businesses.
- 2.1.7 A large number of the businesses in Leicester are small enterprises employing less than 20 employees. Many of these are run by people from Asian and other ethnic communities for whom English is not their first language. Several languages are spoken by proprietors and staff including Bengali, Gujarati, Urdu, Chinese and Turkish.

2.2 Scope of Leicester City Council's food enforcement responsibilities

- 2.2.1 As a Unitary Authority the Council is responsible for the full range of **food safety** and **food standards** duties laid down by the Food Safety Act 1990. From January 2006, new food hygiene legislation was introduced into the UK. Many but not all requirements are the same as or similar to those in the regulations they replace. An important new requirement is for all food businesses to have written food safety management procedures based on the principles of hazard analysis critical control points (HACCP). There are also some changes about approved food premises.

2.3 Demands on food enforcement services

- 2.3.1 Leicester has a diverse range of food-related businesses and premises.
- 2.3.2 There were 25 premises in Leicester subject to the old enhanced product specific hygiene regulations. The European Union Approved establishments comprise those producing dairy products; minced meat/meat preparation establishments and meat products establishment. These premises will be checked on next inspection under the new legislative regime to see if they need to be approved.
- 2.3.4 Leicester City Council acts as 'Home Authority' on food hygiene issues for Walkers Snack Foods and on food standards issues for 30 businesses.
- 2.3.5 There are no feedingstuffs premises approved, registered or approved by the RPSGB in Leicester.
- 2.3.6 The table below shows a distribution of Leicester's food business premises by type and category under the hygiene inspection rating scheme based on risk. A further 161 premises are newly registered and awaiting classification by type and first inspection. The total number of food business premises is therefore 2600.

Level of Risk ¹	Producers	Slaughterhouses	Manufacturers	Packers	Importers	Distributors	Retailers	Restaurants and caterers	Manufacturers of articles in contact with food	Manufacturing Retailers	Total
Total	2	1	69		1	43	699	1617		7	2439
A			11				9	130		1	151
B			24			4	36	379		2	445
C	1		24			16	191	790		3	1025
D			6		1	14	212	151		1	385
E	1		2			7	185	101			296
F		1	2			2	64	59			128
Unrated							2	7			9

Table 1: Distribution of food business premises in Leicester on May 02 2006 by Food Law Code of Practice Food Hygiene Inspection Rating Scheme category.

2.3.7 The risk profile in the area of food standards is as follows²:

Level of Risk	Producers	Slaughterhouses	Manufacturers & Processors	Packers	Importers	Distributors	Retailers	Restaurants	Manufacturers of articles in contact with food	Manufacturing Retailers	Total
Total	1		42	5	8	52	1002	1045	5	39	2199
High											
Medium			21			3	2			4	30
Low	1		13	4	6	37	800	565		32	1458
Negligible			6	1	1	10	172	405	2	3	600
Zero Risk			2		1	2	28	75	3		111
Unrisked³											

Table 2: Food Standards Risk Profile as 1 March 2006 using Consumer Protection Service Risk Rating Scheme.

2.3.8 In 2003 LACORS introduced, following consultation with the Food Standards Agency and TS professionals, a system of baseline risk scores for all business sectors including those associated with food production and supply. One feature is that food related businesses have been given a higher risk rating within the whole spectrum of commercial activity overseen by the Consumer Protection Service. Local authorities

¹ A: Very high risk and requiring inspections every six months; B: Annual inspection; C: Eighteen months; D: Two years; E: Three years; F: Five years; Unrated.

² The Consumer Protection Service is responsible for regulating the activities of an additional 5572 non-food businesses.

³ Unrisked businesses may be new food businesses which have not yet been risked by the Consumer Protection Service or may be former food business premises which now have a non-food business and have been assessed as Zero risk for food quality.

are expected to report performance and activity using the national risk scheme as a common reference point and to bring the frequency of their monitoring activity in line with the national risk assessment.

- 2.3.9 The Consumer Protection Service had been unable to implement the LACORS risk assessment scheme for work scheduling and reporting purposes due to shortcomings in software design. The Service planned to implement the scheme in 05/06 after delivery of redesigned software. However, the set up of the software upgrade was delayed and the training of officers deferred. The risk assessment scheme will be implemented by the autumn of 2006.
- 2.3.10 Once the scheme is introduced the Consumer Protection Service will be able to assess the resource commitment expectation produced by the LACORS scheme. Other authorities have projected significant increased demands on their resources for food related activities. The magnitude of the difference between LACORS expectations in regard to High and Medium Risk Businesses and LCC delivery is not clear at this stage. It is possible that a significant diversion of staff resources would be required from other areas of consumer protection activities.
- 2.3.11 When the scheme is implemented Leicester CPS will use the scheme for reporting purposes and, as far as priorities and resources allow, reviews of businesses and inspectional activity will be informed by the LACORS guidance. The recommended emphasis will be on the higher risk businesses.
- 2.3.12 It should be noted that the Treasury commissioned report into inspectional activity (The Hampton Report 2005) recommended reducing the regulatory burden for well-run businesses such as national supermarkets by concentrating inspections on high risk businesses and known rogues. Government accepted the Hampton Report recommendations and the Better Regulation Executive (ODPM) is reviewing risk assessment schemes. It is probable that the LACORS national risk assessment scheme will be reviewed and amended in the next year or so.

2.4 Organisational Structure

- 2.4.1 Enforcement of food safety legislation in all city food businesses is the responsibility of Environmental Health.
- 2.4.2 As part of a review of priorities and resourcing within Environmental Health, the Food Safety Team has responsibility for inspecting “high risk” food premises. Area Environmental Health, Health & Safety and Pollution inspect the “low risk” premises. The Team Manager (Food Safety) has strategic lead for food safety enforcement and the food hygiene inspection programme.
- 2.4.3 The Consumer Protection Service has responsibility for food standards issues such as the labeling, pricing, composition, weights and measures aspects of foods and feedingstuffs. The Service also provides information, advice and support to consumers with food enquiries and complaints.
- 2.4.4 *See Annex A for the **Organisational Structure**.*

2.5 Provision of Specialist Services

- 2.5.1 Food Examination for microbiological purposes is carried under a service level agreement with the Leicestershire Pathology Service at the University Hospitals of Leicester NHS Trust.

2.5.2 Scientific investigations into the composition, authenticity, quality and labeling of food products are carried out by two Public Analysts appointed by the Authority, Leicestershire Scientific Services and Eurofins Scientific.

2.5.3 Agricultural analysis is carried out by Leicestershire Scientific Services and Eurofins Scientific.

2.6 Consumer and business access to help and advice

2.6.1 Food enforcement services are delivered primarily from Leicester City Council's main administrative complex located in the City Centre. Public access to Services is within office hours although officers work outside these hours when the nature of work dictates.

2.6.2 Consumers and businesses can report complaints relating to food or seek information and advice through a number of gateways.

2.6.3 Leicester City Council operates a comprehensive drop-in and phone-in Customer Service Centre in its main administrative complex during office hours.

Customer Service Centre
New Walk Centre
Welford Place
Leicester, LE1 6ZG.

Leicester City Council operates a dedicated telephone call center for its services during office hours: Tel: 0116 252 7000.

The Consumer Protection Service has a 'High Street' presence for drop-in and business phone-in enquiries during office hours.

Consumer Advice Centre
6 Bishop Street
Leicester, LE1 6AF
Tel: 0116 252 6577

Enquiries/complaints on consumer matters (including food) are dealt with by Consumer Direct East Midlands on:

08454 04 05 06

This advice service will operate 08.00 to 18.30 (Mon-Fri); 09.00 to 13.30 on Saturdays.

Environmental Health operate a telephone advice line during office hours; Tel: 0116 252 6420.

A translation and interpreting service is available within the Council.

Environmental Health has an e-mail address at health@leicester.gov.uk and the Consumer Protection Service has an e-mail address at consumer.protection@leicester.gov.uk. Food Safety/standards has a website www.leicester.gov.uk/food

2.7 Enforcement Policy

- 2.7.1 Leicester City Council's Community Protection and Wellbeing Division works in accordance with the City Council's Enforcement Policy which was agreed by the City Council in March 2002. This Enforcement Policy reflects the Enforcement Concordat adopted by the City Council in March 1999 and the Crown Prosecution Service Code of Practice for Crown Prosecutors.
- 2.7.2 The Enforcement Policy seeks to ensure that officers carry out actions in a fair, practical and consistent manner and that formal enforcement is applied only where there is a real risk of harm to people's health and economic interests.
- 2.7.3 Enforcement processes and responses are being documented to ensure quality and consistency in application. Decisions will be monitored to ensure consistency and compliance with the Enforcement Policy.

3.0 Pro-active monitoring of business standards and conduct

- 3.1 A database of commercial and domestic premises (including those connected with food businesses) is maintained on a Uniform computer software package. The database is shared by other services in the department. Records of around 2600 food related businesses and premises are held on the database.
 - 3.1.1 The records of businesses that have ceased trading will be closed and archived in accordance with the protocol agreed by the Uniform Users Group.
 - 3.1.2 There is considerable turnover and change in Leicester's food related business sectors. This is particularly evident within restaurants and cafes. Environmental Health deals with about 200 new food registrations every year and is the lead service for keeping up to date the records on food premises in the database.
 - 3.1.3 Leicester City Council's food enforcement services undertake pro-active monitoring of businesses and premises through use of a mandatory inspection rating scheme and based on consumers' economic interests. Monitoring is usually undertaken in a physical inspection of the premises although for some matters product sampling and testing will take place. A variety of factors are taken into account in the targeting of monitoring efforts. These include the nature of the business, its size, the customer profile, track record of compliance, quality of management systems. They are set by Foods Standards Agency and determine the number of inspections we are required to do in any one year.

3.2 The Food Safety Programme 2006/07

- 3.2.1 In January 2006 new food hygiene legislation was introduced in England and across the EU. Many of requirements are the same as or similar to those in the regulations they replace. The main new requirement is that all food businesses must have written food safety management procedures based on the principles of hazard analysis critical control points (HACCP).
- 3.2.2 The Food Standards Agency (FSA) has devised a pack entitled "Safer Food Better Business" to help small business caterers meet this new requirement. A bid will be made to the FSA at the next round, for pump priming funds to help introduce this pack into selected catering businesses in Leicester. However, the remaining and majority of food businesses will have to be introduced to documented HACCP procedures on routine inspection by our Environmental Health Officer staff. This will mean each

inspection will take longer and fewer inspections being completed compared to last year. The food hygiene inspection target for 2006/2007 has been adjusted accordingly.

- 3.2.3 Leicester has been selected by the FSA to pilot a “scores on the doors scheme” in the city. This is seen as a great opportunity to help drive up food safety standards and promote customer choice. It will be aimed at caterers initially. Following a routine inspection by our enforcement staff, information will be displayed on the premises (with the co-operation of the food business) and on the council’s website for the public. This information will include a summary of the inspection findings and a “score” depicted by degrees of smiley faces. The success of the scheme will depend on publicity and a high profile media campaign is planned.
- 3.2.4 The FSA has given us permission to relax our food safety planned inspection programme to accommodate the “scores on the doors” pilot. However, many of the premises due an inspection this year are also in the scores on doors scheme. Those that are not will need to be brought forward from next year’s programme. New food premises, which have registered with us, will also need to be incorporated. The initial selection of food premises would include arrange of takeaways and pubs serving food etc. These are considered to be in the public interest as they exist in numbers to provide wide consumer choice.
- 3.2.5 Inspections of certain high-risk businesses outside its scope of a pilot would continue. These include approved premises like meat and dairy product manufacturers, other businesses with poor histories of compliance, and some new businesses.
- 3.2.6 Approximately 1,250 food hygiene inspections will be conducted during the year, of these around 1,000 inspections will be conducted from the food hygiene inspection programme shown below. Any shortfall will be carried into future year’s programmes. The shortfall of 187 food hygiene inspections due but not conducted during 2005/2006 will be given priority for inspection during 2006/2007.

Food Hygiene Inspection Programme

Inspection Rating Categories	High risk (A to C)	Low risk (D to F)	Total (A to F)
Inspection programme 2006/2007	1075 ¹	240	1315
Inspections carried over from 2005/2006	187	221	408
Total inspections 2006/2007	1262	461	1723

Food Hygiene Inspection Programme for 2006/2007. See also table 6.2.1

¹ includes 91 category A premises to be inspected twice

- 3.2.7 Participation in the “Scores on Doors” Pilot and the inspection of other high-risk food premises from the food hygiene inspection programme as outlined is recommended. However, the situation will be monitored carefully and if necessary our participation in the pilot will be modified appropriately should we need to release more resources in to other high-risk and reactive work in particular. The Team Manager (Food Safety) will monitor the food hygiene inspection programme as a whole and will periodically report on progress to the Head of Service.

3.3 Food Standards Inspections and Interventions

- 3.3.1 The inclusion of food standards issues in the inspections of other lower risk businesses is considered by lead officers when scoping the sectoral surveillance projects that are scheduled in the Service's Market Review and Surveillance Programme. Generally speaking where the business sector is large then a sample of around 10% of businesses will be inspected for the purposes of a 'reality check'. Where there is adverse local or national information then a more inspection based intervention would be undertaken.
- 3.3.2 Food standards inspections may include checks on pricing, compliance with date mark requirements, use of appropriate weighing equipment, display of statutory notices. A food standards inspection can lead to the acquisition of food samples to check on the quality, composition and labeling of foods.
- 3.3.3 The main business sectors programmed for review in 2006/7 and which have food related activities are:- Asian Sweet Manufacturers (22); Butchers (33); Department Stores (6); Grocers (83); Restaurants (31); Takeaways (112); Public Houses (65) and Night Clubs (4); Confectionary Shops (12); Newsagents (22).
- 3.3.4 The total number of food related businesses scheduled for review and inspection, as part of sectoral project or individual business risk assessment, is 409.
- 3.3.5 Food standards sector reviews and interventions are programmed at the frequency recommended in the Food Safety Act 1990 Code of Practice 2004 and in accordance with the Consumer Protection Services risk assessment scheme. The nature and significance of the risks associated with poor food hygiene generally leads to a different frequency and pattern of inspections than in the case of food standards.
- 3.3.6 An inspection may be triggered or brought forward in response to complaints about a food business.
- 3.3.7 Where serious non-compliance is discovered a re-inspection/s will take place until compliance is confirmed.
- 3.3.8 The food standards intervention workload is dependent on the scoping of the sectoral projects undertaken by the team managers and lead officers. Scoping is carried out throughout the year and takes into account complaint data, topical concerns, regional and national plans, resources.

3.4 Complaints about Food Products and Food Premises

- 3.4.1 All food complaints from the public and trade are recorded and assessed by officers to identify the appropriate response. A significant number give rise to public health or economic issues and require prompt investigation. Those that do not require prompt action are recorded for officers to consider or raise with business proprietors at the next scheduled contact.
- 3.4.2 Environmental Health investigate complaints about specific products and food premises relating to food hygiene on a risk based approach. Those that do not require prompt action are recorded and allocated to officers to consider should it be appropriate to raise with business proprietors at the next programmed inspection date.
- 3.4.3 During the year 2005/2006 the Environmental Health Service recorded:

- 81 food purchase complaints
- 721 complaints and requests for service about food premises

Similar numbers are anticipated this year.

- 3.4.4 The Consumer Protection Service investigates a broad range of food related complaints including those relating to the way in which a food or drink product is marketed, described, priced, labeled and packaged. Significant proportions of complaints relate to durability or are initiated by officers sampling or inspection work.
- 3.4.5 The Consumer Protection Service is expecting to receive around 170 (161 in 2005/6) food related complaints from members of the public and traders via the Consumer Advice Centre. These will be forwarded to appropriate public protection services.
- 3.4.6 The Consumer Protection Service expects to investigate around 110 complaints from the public (103 in 205/6 and 50 (44 in 2005/6) complaints made by other local authorities related to Leicester sourced food products.
- 3.4.7 No significant increase is expected in the number of complaints, enquiries and investigations arising from food and it is estimated that 0.52 FTE officer will be required to deal with them.

3.5 Business Advice

- 3.5.1 Advice is available to food businesses on request. Generally, however, advice is provided during visits to premises. Information leaflets and packs are available for people considering setting up a food business
- 3.5.2 Environmental Health and the Consumer Protection Service provide a telephone advice line for businesses.
- 3.5.3 Environmental Health does record data on the number of businesses requesting advice outside of the inspection programme. Advice to the home authority businesses is calculated at 2 days of officer time.
- 3.5.4 The Consumer Protection Service expects to receive around 30 requests from traders for advice on food standards matters (29 in 2005/6) and an additional 10 from home authority businesses (9 in 2005/6). Also around 5 enquiries from people intending to start up food import businesses (6 in 2005/6)
- 3.5.5 Environmental Health has formal 'Home Authority'⁴ relationships with Walkers Snack Foods.
- 3.5.6 The Consumer Protection Service has informal 'Home Authority' relationships with 20 local food businesses.

3.6 Food Sampling

- 3.6.1 The acquisition and analysis of food products is an integral feature of Leicester City Council's monitoring activities.

⁴ Home Authority relationships are established for businesses, which have a significant regional or national trading presence and therefore interact with the regulatory services of numerous local authorities. The Home Authority undertakes to take a lead role in providing business advice to that business and taking up a central liaison role in the event of problems being discovered. Relationships differ in the level of formality. Information on Home Authority commitments are maintained at national level by LACORS.

- 3.6.2 Environmental Health undertakes microbiological sampling in accordance with local priorities including those identified by the Leicestershire Food Liaison Group, and in support of EU and LACORS co-ordinated food surveillance programmes.
- 3.6.3 The food sampling programme for Leicestershire will form the basis for Leicester's food microbiological sampling activities. This programme will encompass international, national, regional, and local sampling issues.
- 3.6.4 Programs have been set for 2006/2007 food sampling.
- 3.6.5 The Environmental Health sampling programme is contained in Annex E. Around 150 samples will be acquired.
- 3.6.6 The Consumer Protection Service approach to food standards sampling is to monitor:-
- The ingredients used in the final product from 'Home Authority' producers
 - Food that is prepared in Leicester for consumption in Leicester
 - Food and ingredients imported into the UK from outside the EU by Leicester based businesses
 - Specific product related products identified by Leicester consumers by way of complaint, consultation, eg. Products with specific health claims.
 - To participate in any regional/national programme which would benefit the consumers of Leicester.
 - Food that is imported into the UK by Leicester based businesses.
- 3.6.7 In deciding which food products to sample the Consumer Protection Service will consider:
- The susceptibility of the product to quality variation or deliberate adulteration at local level
 - The level of detriment that this may cause
 - The vulnerability of consumers, that is higher priority to the elderly, children and people with illnesses.
- 3.6.8 The Consumer Protection Service sampling programme is contained in Annex D. 100 samples will be acquired.

3.7 Outbreak Control and Infectious Disease Control

- 3.7.1 Environmental Health will record all notifications of food poisoning. High risk patients will be monitored and where necessary be excluded from work or school/nursery until clearance is obtained from the Consultant in Communicable Disease Control (CCDC), Leicestershire Health Authority. In 2005/2006 received 309 notifications from the CCDC.
- 3.7.2 It is estimated that there will be 350 notifications during 2006/2007.
- 3.7.3 The Outbreak Control Plan will be implemented in the case of a major outbreak. The resources required will depend on the nature and extent of any outbreak. If necessary, resources will be diverted away from other lower priority work areas and activities.

3.8 Responses to Food Alerts (previously called Food Hazard Warnings)

3.8.1 Environmental Health and the Consumer Protection Service will deal with food alerts in accordance with the Food Law Code of Practice. The Team Manager (Food Safety) has lead responsibility. The out of hour's service receives any food alerts, which occur outside normal office hours. Food alerts are received electronically via EHCNet (an e-mail based communication system run by the Chartered Institute of Environmental Health) and by pager.

3.8.2 The resources required will depend on the nature and extent of each food alert. If necessary, resources will be diverted away from other lower priority work areas and activities and/or brought in from the Consumer Protection Service and other regulatory services. During 2005/2006 The Food Standards Agency issued 88 food alerts.

3.9 Responses to Feedingstuffs Safety Incidents

3.9.1 The Consumer Protection Service will comply and act upon any notifications of animal feedingstuffs hazards. None are anticipated in 2006/2007.

3.10 Food Safety and Standards Promotion

3.10.1 A high public and trade awareness of food safety and standards issues is a factor in encouraging better business compliance with best practice and legislation, reducing food poisoning and economic fraud, and creating more informed and discerning consumers.

3.10.2 Environmental Health and the Consumer Protection Service will, subject to other priorities, carry out educational campaigns as an integral element of their enforcement approach. The Services will participate in inter-authority campaigns like the East Midlands Foods Standards Week.

3.10.3 The resource commitment to this area will be up to 4 days from both Services.

3.10.4 A significant contribution to promoting food safety is made by the Environmental Health food hygiene training service. Courses in food hygiene are offered at basic, intermediate and advanced levels in English and several other community languages. 1061 food handlers went on certificated food courses through our unit in 2005/2006. Also 30% (272) of those receiving training at foundation level did so having had it delivered in a language other than English. Approximately 1,100 food handlers will be trained in 2006/2007 and 10 under performing businesses selected for support and coaching.

3.11 Liaison with Other Organisations

3.11.1 It is the aim of the Environmental Health and the Consumer Protection Service to apply best practice in dealings with food businesses and respond in a manner proportionate to the level of risk and detriment. Consistency of approach with neighbouring and national agencies will be sought to the extent that this supports protection of the public and visitors to Leicester. The Services participate in a number of networks:

Food hygiene/safety

- (CIEH) Leicestershire Food Liaison Group
- LACORS Food Liaison Group
- Midland Cities Group
- East Midlands Food and Drink Forum

Food standards

- East Midlands Co-ordination Of Trading Standards (Food Standards) Group
- East Midlands Food and Drink Forum

4.0 RESOURCES

4.1 Financial Allocation

4.1.1 Given the multidisciplinary and integrated organisation of food related service delivery, it makes it difficult to provide a comprehensive and detailed report on the financial allocation to food enforcement.

4.1.2 The Food Safety Team has a cost centre for food related activities.

120351 - Food Safety Control 2006/07

	£	
Staffing	319,145	
Admin	17,643	
Running Costs	16,351	
Gross Expenditure	353,139	

The Cost Centre does not include food complaints, food poisoning investigations and food premises inspections undertaken by officers in other teams within Environmental Health.

Net Expenditure 353,139

120352 - Food Training

This service is run on a stand-alone break-even basis utilising Trainers

4.1.3 The Consumer Protection Service is organised into three teams of multidisciplinary officers tackling consumer protection issues in trade sectors. Food standards issues or related issues such as personal injury, weights and measures may arise in any sector. The Consumer Protection Service makes budgetary provisions for the commissioning of analytical services. No specific sum is ring fenced for food analysis.

4.1.4 The Departmental Budget Strategy for 2006/7 notionally maintains a no-growth budget for the Consumer Protection Service from 1 April 2006.

4.1.5 However, the division, with other services in the department, is subject to an Organisational Review that is required to deliver budget reductions and this may impact on the food enforcement function.

4.2 Staff Allocation

4.2.1 As with the Financial Allocation it is difficult to disaggregate the planned or actual allocation of staff resources to food related enforcement. However, the introduction of work time analysis in 2005 has enabled us to work out 9 1/2 full time equivalent staff

engaged on enforcement work and one full time equivalent member of staff on training. .

- 4.2.2 In 2004 Environmental Health has established specialist teams for higher risk work including Pollution, Health & Safety, Food Safety and Private Sector Housing. Also three Area Environmental Health Teams have been established doing general Public Health work plus some defined work from the specialist teams. Flexibility comes through the ability of area teams to reprioritise and support further specialists work as appropriate.
- 4.2.3 The management of food related activities is undertaken by the Team Manager (Food Safety) who have an overall strategic lead role for the Service. All staff are EHORB Registered.
- 4.2.4 Administrative support consists of 5.5 FTE posts of which at least 1.0 FTE is dedicated to supporting food safety related activities.
- 4.2.5 The Consumer Protection Service comprises 14.5 (18 in 2004/5) Trading Standards and Consumer Protection Officers. There are no posts which specialise in food related enforcement although it is a significant (but not necessarily the main) element in the work activities of 3 officers and 1 Manager. The Service has 6 officers with appropriate qualifications and experience to meet the requirements of the FSA Code of Practice .
- 4.2.6 The demand for animal feedingstuffs enforcement in Leicester is negligible.

4.3 Staff Development Plan

- 4.3.1 The department has Investor in People Status. All staff in Environmental Health and the Consumer Protection Service are subject to an annual appraisal under a corporate Appraisal Scheme. The appraisal covers issues of performance, current and anticipated learning needs.
- 4.3.2 Environmental Health and the Consumer Protection Service operate locally devised competency schemes to facilitate staff development.
- 4.3.3 Identified needs are prioritised according to beneficial impact on service delivery and management. Generally speaking the order of priorities is: training to satisfy statutory/mandatory requirements (e.g. Food Standards Agency minimum training requirements); remedial training to improve shortcomings in individual performance; training to underpin new work areas or fill gaps when competent officers leave; Service capacity building and personal development.

5. Quality Assessment

5.1 Performance Management

- 5.1.1 Environmental Health maintains documented work procedures. Work will continue on the implementation of the standard set out in the Framework Agreement and the new code of practice 2006. An action plan will be drawn up and implemented over the coming year to ensure compliance.
- 5.1.2 The Consumer Protection Service will review documentation of procedures in the light of the Service Review planned in 2005/6. It is intended that key processes – as required by COP/Planning Requirements – will be largely documented by March 2007.

5.1.3 Front-line managers undertake management of performance and this includes regular desktop reviews of complaint and inspection files. This includes reviewing all adverse samples and checking all notices served.

5.1.4 Officers who are new to food enforcement or have returned after a prolonged absence are subject to closer supervision depending on the quality of their prior experience and CPD history.

5.2 Customer Satisfaction Surveys

5.2.1 As random selection of food businesses, subject to an inspection are sent a customer satisfaction questionnaire for completion and return to the Head of Service. Criticisms of the service are investigated and if necessary service improvements made.

5.3 Complaints against Service

5.3.1 Complaints against Service are investigated by line managers and the Head of Service depending on the nature of the complaint and the complainant's satisfaction with the outcome. The findings of complaint investigations are considered and actioned appropriately. In 2005/2006 there were no complaints against the Food Safety part of the Environmental Health Service.

5.4 Intra-authority and Inter-authority Audits

5.4.1 Environmental Health is a member of the Leicestershire Food Liaison Group and had an inter-authority audit in June 2003 and another is planned for 2006.

5.4.2 The Consumer Protection Service is a member of the Trading Standards East Midlands (TSEM) partnership and was Peer Reviewed in January 2006. The findings of the review have been incorporated into the business plans for 2006/2007.

6. Review against Service Plan 2005/2006

6.1 Review against the Service Plan

6.1.1 The Service Plan for Food Law Enforcement is a composite plan extracted from the Business Plans of the Environmental Health and the Consumer Protection Service for the purposes of seeking councillor endorsement and satisfaction of the Food Standards Agency's requirements.

6.1.2. Activities are reviewed on a quarterly basis by the lead managers to their respective Service Management Teams on the performance against commitments and targets made in the Business Plans. Quarterly meetings with the Service Director follow, where any discrepancies in the business plan are discussed and action plans prepared to address them. The performance indicators form part of the health indicators for the Community Protection and Wellbeing Division.

6.1.3 Review of performance against this plan will be reported to members

6.2 Environmental Health Achievements 2005 /2006

6.2.1 The Food Hygiene Inspection Programme for 2005/2006 set out 1,541 inspections of food businesses to be conducted in accordance with the FSA inspection rating scheme (a further 363 inspections from the 2004/2005 programme remained to be conducted). Achieving 100% compliance was not possible with in existing resources and we also needed to retain some resources to respond to local food safety concerns. Officers took the decision to concentrate resources on only inspecting "high risk" food safety

premises such as manufacturers, restaurants and caterers. A target of 95% compliance in achieving the high risk food hygiene inspection programme was set. This equates to 1,207 food safety inspections being completed. Inspections from the low risk food safety inspection programme would only commence if resources permitted. One disadvantage of reducing inspection targets is that it can result in an increasing number of inspections being carried over to the following year. The programme for 2005/2006 was:

Food Safety Inspections Programmed 2005/2006

Inspection rating categories	High risk (A to C)	Low risk (D to F)	Total (A to F)
Number of inspections due in April 2005	1,270	271	1,541
Number to be inspected	1,207(95%)	0	1,207
Number of inspections achieved	1,120 ¹ (93%)	35 ² (13%)	1,155
Shortfall (to be carried forward into 2006/2007)	187 ³	221 ³	408

¹ includes 182 records closed during 2005/2006 – businesses ceased trading

² includes 8 records closed during 2005/2006 – businesses ceased trading

³ these values were taken from Uniform on May 03 2006

As can be seen from the table above, we completed 93% of the “high risk” food hygiene inspections due during 2005/2006. Also some “low risk” inspections were conducted as part of investigations. These likely resulted from a complaint about the food business. 13% of the “low risk” food hygiene inspections were also completed from the programme. Inspections due but not conducted during 2005/2006 are added to the 2006/2007 inspection programme.

6.2.2 Resources were also made available for local issues including:

- **Enforcement action** in cases of “imminent risk to health “conditions. 31 Emergency Prohibition Notices have been served on Food businesses with severe rodent activity. Some proprietors of food businesses still appear not to be taking their legal responsibilities seriously and have inadequate pest management and proofing systems in place. One prosecution and five formal cautions were administered along with 57 improvement notices served during the year for serious contraventions of food safety legislation. Also 1,134 informal letters were sent out following routine food safety inspections.
- **Imported foods** The Food Standards Agency have directed local authorities to focus more attention on imported foods from countries outside the EU, and particularly illegally imported food. This is incorporated into officers’ checks on routine inspection of food businesses. During the year coconut water, dried

fish and corned tinned meat were all seized from shops in Leicester because they were illegally imported.

6.2.3 In 2005/2006 resources in food safety training were targeted into areas of identified local need. These included the following:

- **Training** - A record 1144 food handlers received training through our centre Also 30% (272) of those receiving training at the foundation level did so having had it delivered in a language other than English.
- **Healthier Food Choices** - In order to promote healthy food choices and good diet; Asian caterers were encouraged to use less salt and fat in their dishes through an initiative designed to highlight the health issues of such a diet and the availability of suitable alternative ingredients. Simultaneously the Royal Society for the Promotion of Health (RSPH) Health and Nutrition (level 1) course for businesses was launched during the year.
- **Alternate Funding Sources** – In December 2005, with out much advance warning, funding from the Learning Skills Council via the Council’s Adult Education was stopped. A recovery strategy including finding new funding streams is being developed.

6.3 Consumer Protection Service achievements 2005/06

6.3.1 Proactive Market Interventions 2005/6- The food related sectors scheduled for review in the 2005/6 Food Enforcement Plan were as follows:-

Sector	Sectoral Food Risk	Intervention
Caterers	Low	Inspections undertaken. One major noncompliance found.
Food Manufacturers	Medium	Inspections undertaken. A number of minor labeling infringements but no major compliance issues
Restaurants	Low	Inspections undertaken. A number of minor infringements found.
Takeaways	Low	Inspections undertaken and samples taken. A small number of issues with excess artificial colourings being used.
Butchers	Medium	Inspections undertaken. No major compliance issues
Butcher Manufacturers	Medium	
Pubs	Low risk	Inspections undertaken. No major compliance issues.
Grocers	Low risk	‘out of date’ food and tampering with date marks found in number of premises. One business prosecuted.
Fishmongers	Low risk	Rescheduled due to insufficient resources to complete
Hot Food	Negligible	Rescheduled due to insufficient resources to complete
Confectioners	Negligible	Rescheduled due to insufficient resources to complete
Ice-cream	Low	Rescheduled due to insufficient resources to complete
Nursing Homes	Negligible	Rescheduled due to insufficient resources to complete

Hospitals	Negligible	Rescheduled due to insufficient resources to complete
Petrol Stations	Low	Inspections undertaken. No major compliance issues.
Undertakers	Negligible	Rescheduled due to insufficient resources to complete
Dairy Products	Medium	Inspected and minor non-compliance
Newsagents	Low	Inspected and minor infringements

The Consumer Protection Service undertook inspections of 16 major food businesses based in the City, 5 more than those planned in order to catch up on the deficit of 2004/2005.

6.3.2 Complaint Investigation - 179 (225 in 2004/5) food related complaints were received by Leicester City Council in 2005/6 from members of the public, other businesses and local authorities via the Consumer Advice Centre. Where appropriate complainants were referred to enforcement officers in the Environmental Health Service and Consumer Protection Service. This figure has dropped in this year possibly due to the introduction of the Consumer Direct consumer complaint service, where complainants are filtered and referred directly to the correct Authority.

In 2005/2006 the Consumer Protection Service recorded:

- **73** (159 in 2004/5) investigations arising out of complaints from members of the public (**64** from Leicester consumers, **9** from non-Leicester consumers)
- **38** (33 in 2004/5) investigations initiated into Leicester based businesses as a result of referrals from other local authorities.
- 18 (17 in 2004/5) instances of major non-compliance were found through monitoring activities or complaints received and which required re-inspections to verify compliance.

The Food Enforcement Plan 2005-6 did not forecast any significant changes in the level or nature of food related complaints and enquiries.

6.3.3 In 2005/6 work with local spice importers was completed as a result of the contamination of chilli with Sudan 1 red dye and Aflatoxin.

6.3.4 Following complaints received an investigation was carried out into the local retail and importation of Zam Zam water from Saudi Arabia. Waters were sampled and tested. The results of our findings were submitted to the Food Standards Authority and we are awaiting their advice on further action.

6.3.5 Business Advice – The Consumer Protection Service recorded 54 (45 in 2004/2005) requests from traders for advice on food standards matters in 2005/2006. 38 from traders based in Leicester, 9 from Home Authority Traders and 7 from traders out of the city.

6.3.6 Consumer and Business Education – The Service took part in a seminar for Asian takeaway restaurants along with Officers from the Environmental Health Service. The Seminar promoted the reduction in salt and artificial colourings in meals.

6.4 Identification of any variance from the Service Plan 2005/2006

- 6.4.1 Some of the policies and procedures required in the Food Standards Agency's Framework Agreement have had to be taken forward into this year's plan and will reflect the requirements contained in the new code of practice.
- 6.4.2 Resources were committed to attempting to achieve the performance indicator of food inspections achieved against the target. The table below highlights our achievements. Please note the 1% shortfall in the "high risk" food inspection target equates to 13 inspections.

Inspection Rating Category	A to C	D to F
Number to be inspected	1,270	0
Number inspected	1,207	35
% Achieved	93	13
PI Target 2005/2006 [%]	95	0

Table 4: Food hygiene inspection programme for 2005/2006

- 6.4.3 The shortfall is due in the main to the high number of Emergency Prohibition Notices having to be served to temporarily close 29 food businesses due to "imminent risk to health conditions. The 35 low risk food hygiene inspections were not conducted as part of the inspection programme but as a result of a complaint investigation or other reason to visit.
- 6.4.4 From October 2001 the Consumer Protection Service's market surveillance activities (inspections, sampling) have been steered by the Service Management Team using the five-year rolling programme of Market Sector Intervention Projects. The scheduling of reviews/interventions is under continuous review due to other work demands on the staff resources. In 2004/5 the Service experienced a considerable reduction in its capacity to deal with food related enforcement and projects were rescheduled. Staff development measures are being taken to increase individual productivity and the capacity of the Service to handle more complex food business inspections and associated advisory duties. Clearer guidance has been given to staff on the expected level of response to discovered infringements.

6.5 Areas of Improvement

- 6.5.1 The work plans for food safety and standards activity are contained within the Street Scene Division Service Plans 2006/07.
- 6.5.2 The Food Safety Service will update its policies and procedures in line with the Food Standards Agency Framework Agreement and new code of practice.
- 6.5.3 Resources permitting, new registrations will be inspected within 28 days of notification and all our food sampling credits will be used.

7. Annexes

Annex A: Organisational Chart

Annex B: Resource Assessment - Food Safety

Annex C: Resource Assessment - Food Standards

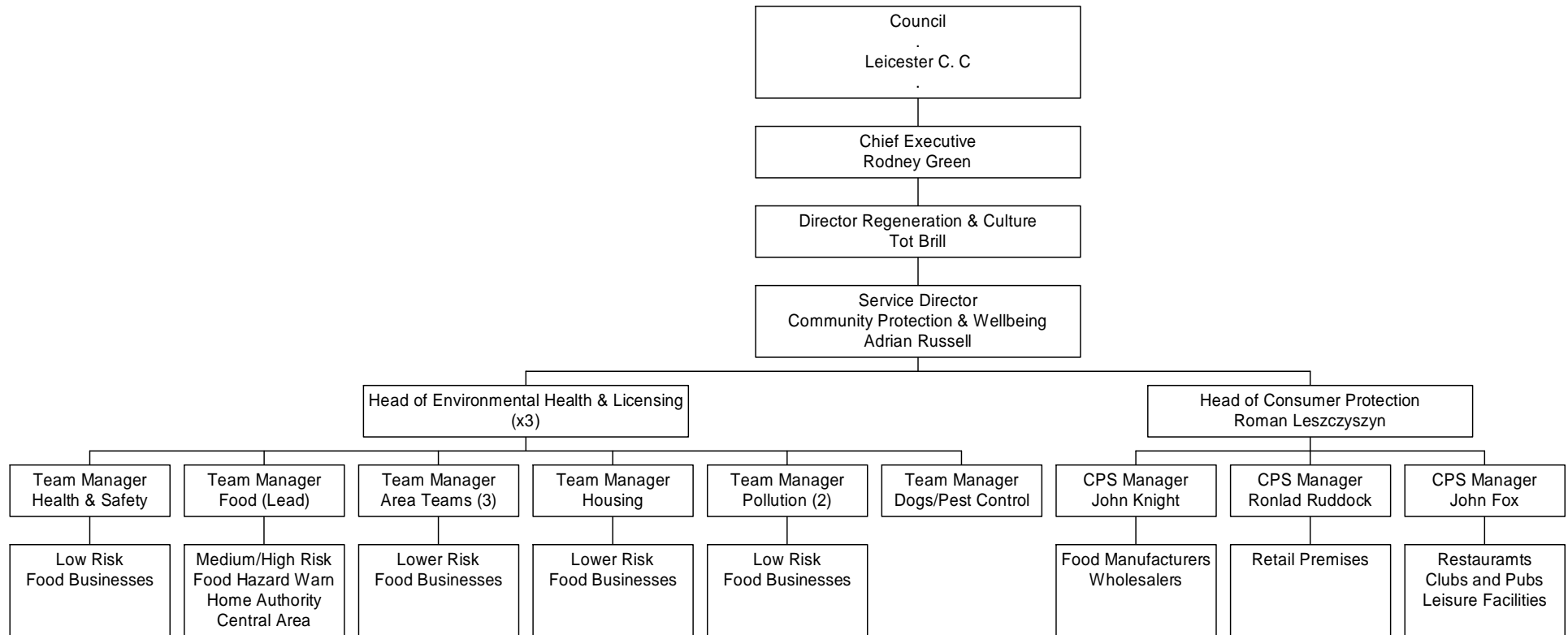
Annex D: Consumer Protection Service Sampling Programme 2006/2007.

Annex E: Environmental Health Sampling Programme 2006/2007.

Annex F: Achievements and variations in the 2004/05 Food Enforcement Plan

Annex A

Leicester City Council – Organisational Structure



Annex B

Resource Assessment - Food Safety

1. Working days available for service delivery from Full Time Equivalent Post

1 year		52 weeks
Less		
Annual leave	5 weeks	
Bank Holidays/statutory leave	2 weeks	
Sick leave/compassionate leave/etc	1 week	
Training	1 week	
Service and Team Meetings	1 week	
Appraisal and individual supervision meetings	1 week	
Number of working weeks for service delivery		41 weeks
Number of working days		205 days
Number of hours		1517 hours

2. Food Hygiene Inspections

Assumptions:- 1.2 inspections per day for category A to C premises. 3 inspections per day for category D to F premises. 4 re-visits per day for premises in all categories. The figure includes all documentation of inspection and consequential actions.

Activity	Number of events	Number of days	Number of FTE
Inspections of category A to C premises due on April 2006	1250	1042	5.1
Inspections of category D to F premises due on April 2006	0	0	0
Re-visits to check compliance	350	88	0.43
Total for Food Hygiene Inspections			5.53 FTE

Total staff resource required for food hygiene inspections = 5.53 FTE

3. New Food Business Registrations

Assumption: 2 initial assessments per day for all types of business

Activity	Number of events	Number of days	Number of FTE
Risk assessment of new food business	200	100	0.5

Total staff resource required for risk assessment of new food business = 0.5 FTE

4. Investigation of food purchase complaints and complaints about food premises

Assumption: 1 complaint per day for food purchase complaints. 3 complaints per day for food premises complaints. Includes documentation, communication with complainant and where appropriate investigation, testing, inspection, legal action.

Activity	Number of events	Number of days	Number of FTE
Investigation of food purchase complaint including Home Authority	100	100	0.49
Investigation of food premises complaint including Home Authority	900	300	1.5

Total staff resource required for food purchase/food premises complaints = 2.00FTE

5. Food Safety Sampling

Assumptions: 2 days set up time per sampling programme. 100 samples acquired in 7 programmes, 5 samples per day.

Activity	Number of events	Number of days	Number of FTE
Setting up and co-ordination of sampling programmes	12	5	0.02 (Manager Time)
Acquisition of sample, documentation and processing	150	20	0.1

Total staff resource required to undertake food safety sampling 0.12 FTE.

6. Food Safety Promotion

Activity	Number of events	Number of days	Number of FTE
Hygiene advisor role		50	0.25
Food safety promotional event (SSBB)		25	0.13

Total staff resource available for food hygiene training 0.4 FTE.

7. Special Events/Initiatives

Staff attend and inspects food stalls at one staged events in the city, the Mela. Also to address pest activity in businesses, block surveys are conducted as appropriate. Illegally imported food seizures occur as part of inspection work as appropriate. Also admin associated with the “scores on the doors” scheme including website entries

Assumptions: 2- 5 days pre-planning for each event, with block surveys being allocated 4 members of staff for duration of event.

Activity	No of events	Pre-planning days	Attendance days (x 2 staff)	No's of FTE
Mela	1	2	3	0.009
Block Survey +	1	1	8	0.25
Imported food +	1	1	16	
Scores on doors			24	
Total staff resource required @ 0.26 FTE				

8. Administrative Support

Environmental Health has 5½ FTE officers providing administrative support. The functions include inputting data on businesses, complaints and activity into Uniform; maintaining records and files; administering the training courses; providing support and administrative functions for officers.

Total staff resource required for administration of food related enforcement duties and training 1.0 FTE.

Annex C

Resource Assessment - Food Standards

1. Estimation of working hours/days available for service delivery from Full Time Equivalent Post

1 year		52 weeks
Less		
Annual leave	5 weeks	
Bank Holidays/statutory leave	2 weeks	
Sick leave/compassionate leave/etc	1 week	
Training	1 week	
Service and Team Meetings	1 week	
ERDS and individual supervision meetings	1 week	
Number of working weeks for service delivery		41 weeks
Number of working days		205 days
Number of hours		7700 hours

2. Inspection of premises for Food Standards⁵

Assumptions:- 1 inspection of High Risk and Medium Risk premise requires 4 officer/days. 2 inspections per day for Low Risk Premises. 2 re-visit per day for premises in all risk categories. The figure includes all documentation of inspection and consequential actions.

Activity	Number of events	Number of days	Number of FTE
High Risk	25	100	-
Medium Risk	50	200	1
Low Risk	80	40	0.2
Re-visits	40	20	0.05

Total staff resource required for food standards inspections = 1.25 FTE

3. Risk assessment of New Food Business

Assumption: Desk top assessments for all types of business and entry onto system.

Activity	Number of events	Number of days	Number of FTE
Risk assessment of new food business	200	5 days	0.05

Total staff resource required for risk assessment of new food business = 0.05 FTE

⁵ This is presented for illustrative purposes and is based on 2004/5 data

4. Investigation of food standards complaints

Assumption: 3 complaints per day for food purchase. 1 investigations per day of adverse samples and significant non-compliance's (proportion of adverse samples referred to Home Authority). 2 investigations per day of local authority referrals. Includes receipt, documentation, and communication with complainant and where appropriate investigation, testing and inspection.

Activity	Number of events	Number of days	Number of FTE
Investigation of public food complaints	150	50	0.25
Investigation of significant non-compliances found in monitoring	25	25	0.125
Investigation of Home Authority referrals	50	25	0.125

Total staff resources required to investigate food standards complaints is 0.50 FTE.

5. Advice to Food Businesses in Leicester on Food Standards related matters

Assumption: . 1 advice enquiry per day where this involves Home Authority Advice. 5 advice enquiries per day on food standards related issues. Includes research, documentation, and communication with enquirer.

Activity	Number of events	Number of days	Number of FTE
General advice to businesses	30	6	0.05
Answering requests for information and advice from the Home Authority business	10	10	0.1
Review and production of information/advice sheets	4	5	0.025

The resource required to provide advice to food businesses is FTE 0.175

6. Food Standards Sampling

Assumptions: 1 day set up time per sampling programme involving Head of Service, Manager and Officers. 4 samples per day including liaison with the public analyst, documentation and review of results.

Activity	Number of events	Number of days	Number of FTE
Setting up and co-ordination of sampling programmes	4	4	0.02
Acquisition of sample, documentation and processing	100	25	0.125

The resource required to undertake food standards sampling is FTE 0.145

7. Food Standards Promotion

Activity	Number of events	Number of days	Number of FTE
Preparing seasonal press releases; media appearances; events	-	4	0.02

The resource available to undertake food standards promotion is 0.02 FTE.

8. Administrative Support

The Consumer Protection Service has 3 FTE officers providing enforcement and administrative support. Their functions include licensing, business liaison, maintaining records and files; and providing the generality of support and administrative functions for officers. In relation to food enforcement the Administrative Support staff make a major contribution to maintenance of the database.

The level of Admin support provided for food related enforcement duties is 0.25 FTE.

Annex D
Consumer Protection Service
Annual Food Sampling Programme⁶
2006-2007

Month	H/A Manufacturers	Contamination	Composition/labelling	Quality
April			fat & salt content of children's food - sweets and chocolates (part of national project by tsi)	
May			Spices for Sudan dyes	
June				
July			Trans Fatty Acids, Allergens and Salt in catering foods (EMCOTS)	
August			Takeaway/Restaurant meals for MSG & Salt.	
September		Heavy Metals in herbs survey (EUROFINS)	Ready to roast joints for description. (EMCOTS)	
October			Spirits for substitution & water	
November				
December				
January			Protein claims on pet foods (EMCOTS)	
February				
March				

⁶ Samples of ingredients and product will also be taken from Manufacturers and Importers at the time of inspection visits. This sampling programme will be supplemented by Officers taking food samples in response to food complaints and using their initiative during business visits.

Annex E

FOOD SAFETY SAMPLING PROGRAMME 2006/2007

<u>Month</u>	<u>Description</u>	<u>Source</u>
April	swabs from ice machines	Leics
May to April	“shop basket”	LACORS/HPU
June	salads from kebab shops	Leics
June to March	study on mobile food vendors	LACORS
July	food from homes	Leics
August	chicken sandwiches	Leics
October	swabs from milk dispensers	Leics
November	fresh herbs	Leics
January	water/soda from dispensers	Leics
February	sauces/dips from kebab shops	Leics
March	exotic foods	Leics

Around 150 samples will be taken during the year.

Appendix F: The 2004/2005 Service Plan for Food Enforcement Achievements and Variances.

1.0 A summary of work undertaken in the year 2004/2005 including:

- 1,314 food safety inspections conducted
- 97 new food registration inspections conducted
- 277 improvement notices served at 104 food business premises
- 48 food business premises closed temporarily
- 1 prosecution concluded and 2 formal cautions issued.
- Seized illegally imported food. This included dried fish, and cans and packets of animal based food on sale in food shops in Leicester.
- 355 revisits after food safety inspections to check compliance
- 819 food/food premises safety related service requests investigated
- 73 food samples taken
- 1075 food handlers attended accredited food safety courses
- 74 Food Hazard Warnings responded to
- A range of sectoral reviews of trading standards compliance
- Business advice, education and training activities

1.1 Resources were committed in attempting to achieve the performance indicator of food inspections achieved against the target. However, during the year substantial staff resources had to be diverted to deal with "imminent risk of injury to health" conditions due to rodent activity and found at 48 food business premises. These had to be closed temporarily using emergency powers until the imminent risk was removed. This level of reactive work could not have been predicted and has had an impact on meeting the targets in the food safety inspection programme for the year. The FSA expects local authorities to achieve 100% of their planned programme of inspections.

1.2 As can be seen from the table below, we completed 90% of the "high risk" food safety inspections and 41% of the "low risk" food safety inspections. Inspections due but not conducted during 2004/2005 are carried forward to the 2005/2006 inspection programme.

Food Safety Inspections Conducted 2004/2005

	High risk (A to C)	Low risk (D to F)	Total (A to F)
Number of inspections due in April 2004	1,286	391	1,677
Target number to be inspected	1,222 (95%)	215 (55%)	1,437
Number inspected	1,154 (90%)	160 (41%)	1,314
Shortfall carried into 2005/2006 programme	132	231	363

1.3 In response to rodent activity resulting in a large number of food premises having to be temporarily closed using emergency powers during the year, a proactive strategy was put in place. The following additional work to raise awareness and emphasise the responsibilities of food businesses was undertaken:

- **Day of Action** - On the 14th December 2004 around 60 staff from Environmental Health, Consumer Protection and Licensing were trained and sent to survey 305 food businesses for evidence of pests. Around 170 food premises were given advice on house keeping and pest proofing. 6 food businesses were served emergency prohibition notices and temporarily closed and 3 businesses closed by means of undertakings. The day of action was covered on Central News, on local radio and in the local newspaper.
- **Mail Shot** - All food premises were contacted by mail shot and given advice about signs of infestation and pest management. This information was also put on the food safety website.
- **Rodent Strategy for Leicester** - Work started on a mapping exercise of current control measures and identification of good practice in order to inform the rodent strategy and resulting business plan.

1.4 The focus on rodent activity in food premises also meant the imported food initiative targeting wholesalers and others who import food was not done. Staff did however check imported food whilst undertaking routine planned inspection work and seized some which had been imported illegally. This included dried fish, and cans and packets of animal based food on sale in food shops in Leicester. The focus on rodent

activity in food premises also meant fewer food samples were taken than were planned for the year.