

Appendix

**HOUSING, HEALTH & COMMUNITY CARE  
FOOD SAFETY SERVICE PLAN 2006/2007**

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<p><b>1.0 SERVICE AIMS AND OBJECTIVES</b></p>	
<p><b>1.1 Aims and Objectives</b></p>	<p>The Housing, Health &amp; Community Care Service is committed to ensuring that the highest standards are maintained throughout the district in food premises for which they are the Enforcing Authority, in order to protect both employees and members of the public.</p> <p>Environmental Health staff will adopt an approach to enforcement which will encompass the investigation of cases of food poisoning or suspected food poisoning and food complaints as well as inspections based on risk assessment so as to make effective use of staff resources allocated. Staff will act within the Department’s overall enforcement policy (Document 1) but due regard will be had to guidance from recognised bodies. Rochford District Council has adopted the Enforcement Concordat (Document 2) and therefore staff will carry out activities in this service plan in accordance with the Concordat.</p> <p>Education plays an important part in improving food hygiene standards and therefore Environmental Health staff will carry out the activities in this service plan with an educative approach wherever possible.</p>
<p><b>1.2 Links to Corporate Aims and Plans</b></p>	<p>This service supports Rochford District Council’s Corporate Plan 2006/2007. In particular to work towards the Corporate Aims, ‘Work towards a Safer and More Caring Community’ and ‘Improve the Quality of Life for People in our District by ‘Providing Quality, Cost Effective Services’.</p> <p>This fits with the key themes of ‘Feeling Safe’ and ‘Healthy Living’ in the Community Strategy.</p>

	<p>We follow all of the Council’s values to: ‘Act with integrity’, ‘Be open and transparent about what we do’, ‘Respect others and treat people courteously and equally’, ‘Be responsive to customer needs and requests’, ‘Always try to improve what we do’ and ‘Work with others to improve what we do both directly and through partnership working’.</p>
<p><b>2.0 BACKGROUND</b></p> <p><b>2.1 Profile of Rochford District</b></p> <p>2.1.1 Profile of the Housing, Health &amp; Community Care Service</p> <p><b>2.2 Organisational Structure</b></p> <p>2.2.1 Rochford District Council</p> <p>2.2.2 Housing, Health &amp; Community Care</p> <p>2.2.3 Manager responsible for Food Service</p> <p>2.2.4 Specialist Services</p>	<p>See the website/intranet.</p> <p>See the Constitution (Document 3) and the intranet/website.</p> <p>The Council is restructuring its external services and this will see environmental functions, including this service, incorporated within a new Environmental Services Division. This will not have any impact on the delivery of this plan.</p> <p>Please see the Constitution and the intranet/website.</p> <p>Please see the Constitution and the intranet/website.</p> <p>Safety, Food and Regulation Manager.</p> <p>Samples for analysis are submitted to a Public Analyst at a laboratory accredited for the purposes for analysis and which appears on the list of official food control laboratories. Samples for examination are submitted to a food examiner at a laboratory accredited for the purpose of examination and which appears on the list of official food control laboratories.</p>

<b>2.3 The Scope of the Food Service</b>	
2.3.1	Establish and maintain up to date register of all food premises in the district.
2.3.2	Inspect all food premises on a risk based, rolling programme in accordance with Food Law Code of Practice and Practice Guidance and take enforcement action as necessary. Most of the planned inspections will be carried out by a contractor.
2.3.3	Carry out visits and inspections to food premises as necessary within the plan period, including revisits and investigative visits.
2.3.4	Investigate and resolve all food complaints and all complaints relating to a food business, including refuse, litter, odours, pests, drainage etc, except noise.
2.3.5	Provide advice and assistance to businesses and consumers on food related issues.
2.3.6	Receive and act on all food alerts.
2.3.7	Investigate all food within the district that might be contaminated or illegally imported and take necessary action. Check with Southend Airport and Baltic Wharf for plans to import food. Seize, detain and destroy, as necessary, unsafe or illegally imported food.
2.3.8	Monitor the movement of unsafe food into and out of the Rochford District area.
2.3.9	Take action to close food premises found to present an imminent risk to health.
2.3.10	Act as consultee in relation to alcohol and entertainment licensing.
2.3.11	Provide advice to the Planning Service on food related issues.

2.3.12	Identify butchers shops requiring Authorisation to remove specified risk material (bovine vertebral column) and prepare them for issue of the Authorisation.
2.3.13	Identify premises processing, handling and storing meat products, meat preparations, minced meat, etc. and prepare them for approval.
2.3.14	Identify premises processing, handling and storing dairy, fish and/or egg products, live bivalve molluscs, etc. and prepare them for approval.
2.3.15	Inspect premises processing, handling and storing food(s) that fall under product-specific regulations and ensure that they comply with such regulations.
2.3.16	Undertake a food sampling programme in accordance with the Health Protection Agency, Eastern, Chelmsford Food, Water and Environmental Laboratory Sampling Programme and taking account of current food premises.
2.3.17	Facilitate food hygiene training as necessary, by independent training organisations.
2.3.18	Comment on proposed food legislation, codes of practice and other official documents as necessary and as requested.
2.3.19	Provide appropriate export certification as requested by food companies in the district.
2.3.20	Carry out a health and safety inspection of all premises where the sale of food is the main activity on a risk based rolling programme in accordance with LAC 67/1, and take enforcement action as necessary including revisits.
2.3.21	Investigate and resolve all serious complaints about health and safety where the sale of food is the main activity.

2.3.22	Receive all reports of accidents where the sale of food is the main activity and investigate as necessary using HELA guidance.																					
2.3.23	Investigate all reports of a food poisoning/borne outbreak.																					
<b>2.4 Demands on the Food Service</b>	<p>As at 1 April 2006 the Housing, Health &amp; Community Care Division's database has identified that it is responsible for enforcing Food Safety in <b>601</b> food premises within the Rochford District. According to the Food Law Code of Practice, Risk Categories for these premises can be broken down as follows:</p>																					
<table border="1"> <thead> <tr> <th data-bbox="795 566 1064 598"><u>Risk Category</u></th> <th data-bbox="1108 566 1489 598"><u>Number of Premises</u></th> <th data-bbox="1545 566 2004 598"><u>C.O.P. Inspection Frequency</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="840 638 974 670">A =</td> <td data-bbox="1254 638 1288 670"><b>5</b></td> <td data-bbox="1702 638 1848 670">6 months</td> </tr> <tr> <td data-bbox="840 678 974 710">B =</td> <td data-bbox="1243 678 1299 710"><b>65</b></td> <td data-bbox="1691 678 1859 710">12 months</td> </tr> <tr> <td data-bbox="840 718 974 750">C =</td> <td data-bbox="1232 718 1310 750"><b>188</b></td> <td data-bbox="1691 718 1859 750">18 months</td> </tr> <tr> <td data-bbox="840 758 974 790">D =</td> <td data-bbox="1243 758 1299 790"><b>72</b></td> <td data-bbox="1713 758 1836 790">2 years</td> </tr> <tr> <td data-bbox="840 798 974 829">E =</td> <td data-bbox="1232 798 1310 829"><b>227</b></td> <td data-bbox="1713 798 1836 829">3 years</td> </tr> <tr> <td data-bbox="795 837 974 869">Unrated =</td> <td data-bbox="1243 837 1299 869"><b>44</b></td> <td></td> </tr> </tbody> </table>		<u>Risk Category</u>	<u>Number of Premises</u>	<u>C.O.P. Inspection Frequency</u>	A =	<b>5</b>	6 months	B =	<b>65</b>	12 months	C =	<b>188</b>	18 months	D =	<b>72</b>	2 years	E =	<b>227</b>	3 years	Unrated =	<b>44</b>	
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<p>Unrated premises are: 33 new premises where the risk rating will be determined following an inspection; 10 child minders not needing an inspection because they only provide low risk food; and 1 Approved Meat Products premises which has to be inspected 3 times per year.</p>																						
<p>Following receipt of an updated list of childminders from Essex County Council, a questionnaire is sent to find out the type of catering they provide. Those only providing low risk food eg. drink and snacks are not routinely inspected.</p>																						
<p>The estimated number identified as Manufacturing premises are <b>4</b>                  The estimated number identified as Retail premises are <b>166</b>                  The estimated number identified as Catering Premises are <b>414</b></p>																						

<p><b>2.5 Enforcement Policy</b></p>	<p>As at 1<sup>st</sup> April 2006 the number of approved premises under:</p> <p>Meat Regulations = 1 (Meat Products)          Fish Regulations = 2</p> <p>Food businesses that only operate out of hours are inspected at those times.</p> <p>No particular external factors that may impact on this service have been identified. There are two languages other than English identified as being significant among food handlers and proprietors within the district. These are Bengali and Chinese, however the majority of proprietors are able to speak adequate English or have somebody present at the premises that can translate. In any cases where they may be language difficulties the service would contact Language Direct (020 8539 5142) or Essex Police (01268 775533) for details of an interpreter or use a community interpreting service provided by Medway Council (01634 335578).</p> <p>A number of pamphlets and leaflets on food safety are also available in different languages within the food service at Rochford District. These languages are not seen as placing a particular demand on the food service.</p> <p>This service operates to a documented enforcement policy.</p>
<p><b>3.0 SERVICE DELIVERY</b></p> <p><b>3.1 Inspection Programmes</b></p> <p>3.1.1 Programmed</p> <p>3.1.2 Carry Over</p>	<p>The number of Programmed Food Hygiene Inspections for the period is = <b>303</b>.</p> <p>The number of Programmed Food Hygiene Inspections carried over from the last financial year is = <b>2</b>.</p>

3.1.3	Total	Therefore the total number of Programmed Food Hygiene Inspections for the period is = <b>305</b> . (See the Addendum for a breakdown)
3.1.4	Target	The target for this year is to achieve: Risk Categories A to C = <b>98%</b> Risk Categories D to E = <b>98%</b> All Categories = <b>98%</b>
3.1.5	Revisits	The estimated number of revisits for this plan period is = <b>75</b> .
3.1.6	Non-Programmed inspections	The estimated number on non-programmed inspections is = <b>45</b> .
3.1.7	Other	The estimated number of premises requiring approval = <b>3</b> .
<b>3.2</b>	<b>Food Complaints</b>	All food complaints received including anonymous complaints are investigated in accordance with the good enforcement principle of targeting, transparency, consistency and proportionality. The estimated number for this plan period is = <b>100</b> .
<b>3.3</b>	<b>Home Authority Principle</b>	There are no formal Home Authority Agreements set up for any food business within Rochford District. The Council is, however, the originating Authority for <b>1</b> manufacturing businesses which distribute their products nationwide. Advice on standards is provided to other Councils following complaints made to them about purchases made from outlets outside Rochford District.
<b>3.4</b>	<b>Advice to Business</b>	Advice is provided to existing or proposed food businesses, members of the public, other Council Service Departments and other persons. Advice is mainly person to person whilst Officers are carrying out visits/inspections but may also be following a telephone call or letters to the Housing, Health and Community Care Division.

<p><b>3.5 Food Sampling</b></p>	<p>Officers aim to give advice in accordance with recognised guidance and codes of practice, and a range of advisory leaflets is available.</p> <p>The estimated number for the plan period is = <b>150</b>.</p> <p>The Council has regular meetings with the Chamber of Trade and Federation of Small Businesses, who have been consulted on the Division's Enforcement Policy. The Council invites all businesses to regular breakfast meetings when any topic can be discussed, including food safety.</p> <p>Food sampling for microbiological contamination is carried out in accordance with the Public Health Laboratory Service (Chelmsford)/Essex Food Group Sampling Programme and taking account of current food premises.</p> <p>The estimated number of samples to be taken for this period is = <b>200</b>.</p> <p>It is estimated that there will be no charge from the Health Protection Agency Eastern, Chelmsford Food, Water and Environmental Laboratory Service to analyse this number of samples.</p> <p>The service also enables officers in the food team to carry out random sampling of foods where it is felt necessary. This may occur following a programmed or otherwise visit to food premises or via a food complaint received by the service.</p> <p>Food complaint samples are analysed by a Public Analyst or examined by a food examiner (the Health Protection Agency Eastern Laboratory at Chelmsford or an entomologist) if necessary.</p> <p>It is estimated that <b>8</b> food complaint samples will be submitted for analysis or examination, and provision in the budget has been made.</p>
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<p><b>3.6</b>      <b>Outbreak Control and Inspection Disease Control</b></p>	<p>Food poisoning notifications and outbreaks are investigated within one working day of receipt in accordance with the Control of Communicable Disease Joint Plans of Essex Local Health Protection Team and Essex Local Authorities and following guidance in CDR Review dated 1995.</p> <p>The estimated number of notifications requiring investigation for this period is = <b>150</b>.</p> <p>The estimated number of outbreaks is = <b>1</b>.</p>
<p><b>3.7</b>      <b>Food Alerts</b></p>	<p>Food alerts are handled in accordance with Food Law Code of Practice.</p> <p>The food safety service has facilities to receive food alerts by an electronic mail system as required by the Code of Practice.</p> <p>The estimated number of food alerts received for this period is = <b>125</b>.</p>
<p><b>3.8</b>      <b>Liaison</b></p>	<p>A number of arrangements have been made to improve the consistency of enforcement with neighbouring Authorities.</p> <p>This service actively supports the Essex Environmental Health Management Group's Food Group and the Food Study Group</p> <p>Investigations of suspected food poisoning outbreaks are carried out either jointly or in close contact with the Consultants in Communicable Disease Control (CCDC) for Essex. The service also advises and liaises with other services within Rochford District Council, including: Building Control, Planning, the Environmental Protection Team and the Licensing Team.</p> <p>The service is consulted on planning applications involving food premises.</p>

<p><b>3.9 Food Safety Promotion</b></p>	<p>Food safety promotion on cooking turkeys and barbecues is carried out during the autumn and spring respectively. Leaflets are made available at the 2 Council offices, community centres, butchers, etc., and are given to food poisoning cases. An article on these subjects is included in the autumn and spring editions of Rochford Matters, the free Council newspaper, and a press release is sent to local newspapers. Articles on other food safety matters are also included in Rochford Matters and where appropriate Business Matters.</p> <p>All food poisoning cases are sent or given various advisory leaflets on food safety</p> <p>Participate in the National Food Safety Week by organising a poster competition for school children on the importance of hand washing and a RAP competition on food hygiene.</p> <p>Participate in the National Food Safety Week by organising a public food information day at Rayleigh Civic Suite.</p> <p>Advise schools on providing safe packed lunches.</p> <p>A food sampling advisory leaflet with advice on microbiological standards and food safety is provided following each programmed inspection. It is also sent following an acceptable or unsatisfactory sampling result with a link to the Council's food web.</p> <p>Comprehensive food safety information is available on Rochford District Council's website, and a letter was sent to all food businesses when the website was created.</p> <p>Provide nutritional advice on school meals by working in partnership with Essex Trading Standards.</p>
<p><b>3.10 Export Certification</b></p>	<p>Export certificates for manufacturers within the district exporting various food are provided.</p> <p>The estimated number of certificates requested during this period is <b>0</b>.</p>

<b>4.0 RESOURCES</b>	
<b>4.1 Financial Allocation</b>	<p>The overall total expenditure for the Environmental Health Service is <b>£1,065,300</b>. From this amount the food service is not currently allocated a specific amount.</p> <p>It is estimated that there is an increase in real terms on the last financial year allocation of <b>£1,000</b> because of the additional cost of the audit. Last year <b>£21,500</b> was allocated for the inspection contract and audit (deferred); this year <b>£22,500</b> is allocated for the inspection contract and audit.</p> <p>Approximately <b>£19,000</b> will be spent engaging a food contractor to carry out planned inspections. This is included in the overall total expenditure.</p> <p>Approximately <b>£3,500</b> will be spent engaging a contractor to carry out an audit. This is included in the overall total expenditure.</p> <p>In November 2005, the Health Protection Agency allocated Essex Authorities a sampling budget of <b>82,551 credits</b>. This amount has been divided between Essex authorities. Rochford's allocation is <b>4,000 credits</b>, although credits can be exchanged. Samples can be submitted to these allocations without Councils being charged.</p> <p>Details of the budget for salaries, travel, subsistence, consultancy, and analytical fees are contained in Rochford District Councils Budget Book 2006/2007. In addition, some of the unused inspection and audit budget for last year has been brought forward to provide a credit for the audit.</p> <p>No budget is separately allocated for prosecutions or legal action taken as a result of action under this service, but are provided for within the Legal Service's budget.</p>

<p><b>4.2 Staffing Allocation</b></p>	<p>The staff available for this period is:</p> <ul style="list-style-type: none"> <li>1 Safety Food and Regulation Manager</li> <li>1 Principal Environmental Health Officer (maternity leave until 9/7/06)</li> <li>1 Contract EHO</li> <li>1 Senior EHO</li> <li>1 Part-time Senior EHO</li> <li>1 Senior EHO</li> <li>2 Environmental Health Assistants (EHA)</li> <li>4 Administrative staff (1 part-time)</li> </ul> <p>This staffing allocation is not solely for this service plan. These officers also carry out the Health and Safety, Animal Welfare Licensing, Outbreak Control and Infectious Disease, Skin Piercing Registration, Game Dealer Licensing and Sunday Trading duties. The administrative staff also support the entire Housing, Health and Community Care Service.</p> <p>It is estimated that the above staffing levels will provide sufficient resources to carry out the service delivery outlined in Paragraph 3.0.</p> <p>It is estimated that <b>3</b> full time equivalents work on food safety (plus administrative staff).</p>
<p><b>4.3 Staff Development Plan</b></p>	<p>This service supports the Corporate Aims for Rochford District Council. The staff covering this service will continue to be encouraged, motivated and trained to develop their potential and use their talents for the benefit of the people of the district.</p> <p>This service identifies training and development needs by an annual performance and development review of all staff.</p> <p>One Student EHO is being trained in all functions of Environmental Health.</p>

	<p>The training budget is allocated primarily to those staff in the whole service that are identified as requiring further training to develop their professional and technical skills for the job that they are required to carry out and to deliver Corporate Objectives</p> <p>Budget provision is also available for minor, short ad hoc training courses that become available.</p> <p>For this plan period, the following training needs have been identified:</p> <ul style="list-style-type: none"><li>- Minor ad hoc courses when they become available</li><li>- 1 week Food Microbiology Course at Leeds or Warwick for 1 EHO</li></ul> <p>Cascade training is provided by the officer attending an external training course to other officers in the service.</p> <p>Periodic meetings are organised to discuss matters and issues of consistency arising under this service plan area.</p> <p>Minutes of the Essex Environmental Health Management Group's Food Group and the Food Study Group are circulated to officers in the food service.</p> <p>The Housing, Health &amp; Community Care service and the Council supports Environmental Health Officers that wish to obtain Chartered Status of the Chartered Institute of Environmental Health (C.I.E.H) by taking the Assessment of Professional Development (APD).</p> <p>All E.H.Os that are members of the C.I.E.H. are required to undergo at least 20 hours of Continuous Professional Development (CPD) per year. Whilst officers are responsible for monitoring the amount they have done in a year the service recognises this need and supports staff in achieving the minimum amount required by the CPD scheme. In house training may be organised throughout the year by individuals.</p>
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	<p>Every officer authorised to carry out food hygiene inspections and enforcement will receive structured on-going training, which may take the form of in house training, formal visits or vocational visits. The minimum ongoing/update training is 10 hours per year and is recorded.</p> <p>Officers who have not enforced food law for some time are put through structured revision training before resuming food law enforcement duties. The minimum revision training is 15 hours and is recorded.</p> <p>Officers returning to food law enforcement duties after an absence of more than 3 years are monitored by a more senior officer experienced in food law enforcement for a minimum period of 3 months.</p>
<p><b>5.0 QUALITY ASSESSMENT</b></p>	<p>Before new officers undertake food law enforcement duties independently, they are supervised and monitored by a more senior officer experienced in food law enforcement for up to 6 months.</p> <p>The following peer reviews are carried out:</p> <p><u>Contractor</u></p> <ul style="list-style-type: none"> <li>➤ All letters are checked for compliance with codes of practise and guidance, and to determine the need for a revisit;</li> <li>➤ All computer inspection documents are checked for accuracy of the risk rating and to agree when a rating has been reduced;</li> <li>➤ All reports of inspections are checked for accuracy;</li> <li>➤ 1 full audit using Section's "Management Quality Audit Form" is carried out on a completed high risk inspection per month. This involves a desk-top check and a visit. Therefore, 12 audits to be carried out for the period. The contractor will carry out approximately 218 high risk inspections. Therefore the audit rate is <math>(12/218)*100=5.50\%</math>.</li> </ul>

	<p><u>Staff – Food EHOs</u></p> <ul style="list-style-type: none"> <li>➤ A full audit using the Section's "Management Quality Audit Form" is carried out on 5% of all high risk inspections. This involves a desk-top check and a visit. It is estimated that the Food EHOs will carry out about 12 high risk inspections each per year. Therefore, 1 audit to be carried out each for the period.</li> <li>➤ A full audit using the Section's "Management Quality Audit Form" is carried out on 5 complaints/enquiries received each per year.</li> </ul> <p>A Third Party audit of the Inspection Process will be carried out by a contractor during the period.</p>
<p><b>6.0 REVIEW</b></p> <p><b>6.1 Review against the service plan</b></p> <p>6.1.1 Food Hygiene Inspections</p> <p>6.1.2 Revisits</p>	<p>An annual review against the service plan is carried out.</p> <p>In addition, performance is monitored monthly and a quarterly report is submitted to Members.</p> <p>The review below is for the plan period financial year 2005-2006.</p> <p>The target for the last plan period was to achieve <b>98%</b> of programmed inspections for high risk premises (categories A, B and C), <b>98%</b> for other premises (D and E) and <b>98%</b> for all premises.</p> <p>The actual percentage achieved was <b>99.54%</b>, <b>98.13%</b> and <b>99.08%</b> respectively.</p> <p>The number of revisits carried out was <b>63 (estimate 75)</b>.</p>

<p>6.1.3 Service Request</p>	<p>The number of service requests (food complaints and advice to businesses) received was <b>209 (estimate 350)</b>.</p>
<p>6.1.4 Food Sampling</p>	<p>The number of food samples taken was <b>166 (estimate 200)</b>.</p>
<p>6.1.5 Outbreak control and infectious disease control</p>	<p>The number of notifications received requiring investigation was <b>122 (estimate 150)</b>. The number of outbreaks was <b>0 (estimate 1)</b>.</p>
<p>6.1.6 Food Alerts</p>	<p>The number of food alerts received was <b>105 (estimate 80)</b>.</p>
<p>6.1.7 Export Certificates</p>	<p>The number of export certificates issued was <b>0 (estimate 0)</b>.</p>
<p>6.1.8 Notices</p>	<p>The following number of 'notices' were issued</p> <ul style="list-style-type: none"> <li>- informal written warning letters: <b>241</b>.</li> <li>- Improvement Notices served: <b>1</b>.</li> <li>- Prohibition notices served: <b>0</b>.</li> </ul>
<p>6.1.9 Closures and Prosecutions</p>	<p>The number of emergency closures was <b>0</b>. The number of prosecutions was <b>0</b>.</p>

<p><b>6.2 Identification of any variation from the service plan</b></p>	<p>1. A third party audit of the inspection process was not carried out by a contractor because it was decided to work in partnership with Chelmsford Borough Council and Castle Point Borough Council, and engage the same contractor to audit all 3 councils within a 6 month period. This will reduce the cost of the audit and enable benchmarking.</p> <p>2. An audit of Rochford's food EHOs was not carried out because of demands of other work. However, an internal audit during October 2003 by Rochford's Principal Auditor confirmed that:</p> <ul style="list-style-type: none"> <li>• There are effective procedures in respect of the contract arrangements;</li> <li>• There are effective controls in place in respect of compliance with regulations for inspection programmes;</li> <li>• There are effective procedures in place to ensure training of EHOs is kept up to date.</li> </ul>
<p><b>6.3 Areas of improvement</b></p>	<p>1. The FSAs guidance setting out the requirements for the planning, management and delivery of food safety services needs to be implemented by reviewing and revising existing systems and documenting them, and by creating third party peer review systems to verify its conformance against the Standard.</p> <p><u>Action:</u> The review and documentation of the food safety services system to comply with the FSA's standard will be complete by December 2006.</p>

	<p>2. A third party audit of the food service needs to be carried out.</p> <p><u>Action:</u> A contractor has been engaged to carry out a third party audit of the food service in December 2006.</p> <p>3. An audit of RDC food EHOs needs to be carried out in accordance with 5.0 of this plan.</p> <p><u>Action:</u> An audit of Rochford's food EHOs will be carried out during 2006/07.</p>
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Addendum

PROGRAMMED FOOD HYGIENE INSPECTIONS

1.04.06 TO 31.03.07

<u>Risk Category</u>	<u>Number of Inspections</u>
A	10
B	65
C	143
D	33
E	54