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Food Standards Agency Wales

Summary Report: Focused Audit on the Control and Investigation of Outbreaks of Food Related Infectious Disease

April 2008

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Foreword

Audits of local authorities' food law enforcement services are part of the Food Standards Agency's arrangement to improve the consistency and effectiveness of local authority enforcement and consequently increase consumer protection and confidence in relation to food. These arrangements recognise that the enforcement of UK food law relating to food safety, investigation and control of foodborne infectious disease, hygiene, composition, labelling, imported food and feedingstuffs is largely the responsibility of local authorities. The local authority regulatory functions are principally delivered through their Environmental Health and Trading Standards Services.

The power to set standards, monitor and audit local authority food law enforcement services was conferred on the Food Standards Agency by the Food Standards Act 1999. The Agency's audits of LAs are undertaken under section 12(4) of the Act. Agency audits assess local authorities' conformance against the Food Law Enforcement Standard "The Standard", which was published by the Agency as part of the Framework Agreement on Local Authority Food Law Enforcement and is available on the Agency's website at www.food.gov.uk/enforcement/frameagree/

The main aim of the audit scheme is to maintain and improve consumer protection and confidence by ensuring that local authorities are providing an effective food law enforcement service. The scheme also provides the opportunity to identify and disseminate good practice and provide information to inform Agency policy on food safety.

Further information on the Agency's local authority audit scheme, including Questions and Answers on the operation of the scheme and details of good practice identified during the audits, is available on the Agency's website at www.food.gov.uk/enforcement/auditscheme/.

The Framework Agreement was developed in conjunction with local authorities and sets out the Agency's expectations on the planning and delivery of food law enforcement. The current version of the Framework Agreement was issued in July 2004. It requires LA's to implement the following in relation to the Control and Investigation of Outbreaks of Food Related Infectious Disease:

"The Authority shall set up, maintain and implement a documented procedure which has been developed in association with all relevant organisations in relation to control of outbreaks of food related infectious disease in accordance with relevant central guidance.

The Authority shall set up, maintain and implement a documented procedure which has been developed in accordance with centrally issued guidance, and in

association with all relevant organisations for the investigation of notifications of food related infectious disease.

All records relating to the control and investigation of outbreaks of food related infectious disease shall be kept for at least 6 years.”

Food related infectious disease is usually an acute illness of relatively short onset and duration which affects the gastrointestinal tract. The most common symptoms are vomiting, diarrhoea and abdominal pain. It is caused by the ingestion of food which is contaminated with pathogenic bacteria or viruses but can also be spread from person to person via the faecal/oral route. There are many pathogenic micro-organisms which can cause food poisoning such as Salmonella sp; Campylobacter sp; Clostridium sp; and E.coli O157. There are other specific diseases which can be caused by the consumption of contaminated food such as Typhoid/Paratyphoid, Giardiasis, Cryptosporidiosis and Botulism. Symptoms are usually of short duration with good recovery. However, it can have serious consequences dependant on the pathogenic organism involved and the contamination levels. The disease can be particularly severe in the elderly, very young and the immuno compromised and can have long term effects in some patients. In very rare cases, food related infectious disease can cause death.

An outbreak of infection or other foodborne illness may be defined either as two or more linked cases of the same illness, or as the situation when the observed number of cases unaccountably exceeds the expected number.

[‘The Management of Outbreaks of Foodborne Illness (Dec 1994, Department of Health)]

SECTION 1: INTRODUCTION

Purpose of Report

- 1.1 The audit programme in Wales is a key component of the Agency's monitoring role to ensure consistent and effective food law enforcement services.
- 1.2 This report provides a summary of the focused audit carried out by the Food Standards Agency Wales into the control and investigation of outbreaks of food related infectious disease by Welsh local authorities.
- 1.3 A summary of the main results of the audit and follow up action by the Agency is included in this report.

Scope of the Report

- 1.4 Having arrangements in place to ensure the control and investigation of outbreaks of food related infectious disease is the responsibility of local authority food law enforcement services.
- 1.5 The audit reviewed the arrangements that the 22 Welsh Unitary Authorities (Appendix 1) had in place to ensure the control and investigation of outbreaks of food related infectious disease. This included their internal arrangements and those with partner organisations including the National Public Health Service, Local Health Boards and neighbouring authorities.
- 1.6 Whilst the outbreak of E. coli O157 that occurred in South Wales was a significant factor in this audit being carried out the audit did not focus on the actions of local authorities with regard to that outbreak. The outbreak has been subject to the Chief Medical Officer's review and an ongoing Public Inquiry.

SECTION 2: BACKGROUND

Reason for Audit

- 2.1 During September 2005 the second largest UK outbreak of E. coli O157 occurred in South Wales. A large number of people were affected by the outbreak, in particular schoolchildren and their families. In addition to its size the outbreak was also complex as it was geographically spread over an area covered by several local authorities. Following the E. coli outbreak and subsequent discussion in the Chief Medical Officer's E. coli Steering Group, the Food Standards Agency decided to carry out a focused audit on the control and investigation of outbreaks of food related infectious disease and included staff resources, training and out of hours arrangements.

The Audit Process

- 2.2 Agency audits aim to maintain and improve consumer protection and confidence by ensuring that local authorities are providing effective food law enforcement services.
- 2.3 The focused audit of the control and investigation of outbreaks of food related infectious disease assessed each authority's level of conformance with The Standard using an audit protocol checklist. The checklist was drawn up by the Food Standards Agency Wales to reflect the requirements of current statutory provisions and related official guidance. The checklist can be found on the Agency's website at <http://www.food.gov.uk/enforcement/auditscheme/auditreports/>.
- 2.4 The Food Standards Agency Wales initially contacted local authorities in relation to this audit in January 2007 when it wrote to the Chief Executive of each local authority. Local authorities were asked to provide information on their food law enforcement service but specifically relating to the investigation and control of outbreaks of food related infectious disease. As part of the audit, Agency staff contacted each local authority and also Swansea Bay Port Health Authority, to validate emergency contact details and test emergency arrangements for the investigation and control of outbreaks of food related infectious disease.
- 2.5 The Directors of Public Protection Wales Communicable Disease Technical Panel produced a model plan to act as a template for individual local authority food poisoning outbreak plans. The Plan for Handling Major Outbreaks of Food Poisoning was first produced in 1998 and underwent a major review by the Panel in 2004. The audit enabled the

Agency to review and evaluate the information provided against The Standard and the model plan template.

2.6 This model plan was drawn up in accordance with relevant central guidance including the 'The Management of Outbreaks of Foodborne Illness', (Dec 1994, Department of Health), and met the requirements of the Framework Agreement. It requires local authorities to make arrangements in the following areas:-

- The leadership and coordination of outbreaks
- Consultation with other organisations in relation to outbreaks
- The appointment of proper officers/consultants in communicable disease control and alternates
- Accommodation, staffing and resources for the handling of outbreaks
- The ability to deal with cross boundary outbreaks
- Effective communications during outbreaks
- Mechanisms for the investigation and control of outbreaks
- Training for officers dealing with outbreaks

2.7 The objectives of the focused audit were:

- i) to determine compliance with the Framework Agreement on Local Authority Food Law Enforcement and to check the consistency of local authority outbreak plans with the model plan,
- ii) to examine how local authorities have implemented their plans and procedures in relation to outbreaks of food related infectious disease,
- iii) to identify areas of improvement needed and engage with individual local authorities to bring these improvements about,
- iv) to identify issues that need further consideration,
- v) to identify and disseminate good practice.

SECTION 3: SUMMARY OF THE MAIN AUDIT FINDINGS

Plans for Dealing with Outbreaks of Food Related Infectious Disease

- 3.1 Each of the 22 Welsh local authorities had in place an Outbreak Control Plan which dealt with the investigation and control of outbreaks of food related infectious disease. Of these, 21 of the plans were consistent with the model plan developed by the Directors for Public Protection Wales Communicable Disease Technical Panel in collaboration with the National Public Health Service for Wales (and its forebears), the National Assembly for Wales and the Food Standards Agency. The plan that was not wholly consistent appeared to be based on an earlier version of the model plan and was therefore not as up to date and comprehensive and did not reflect the role of the Food Standards Agency.
- 3.2 The Directors of Public Protection Wales (DPPW) has set up a number of technical panels to advise on areas of responsibility within the fields of environmental health and trading standards. The Communicable Disease Technical Panel was set up to deal with matters relating to communicable disease and to advise local authorities through the Society of Directors. The Panel has been involved in the drafting of best practice standards, reviewing legislation and the preparation of an All Wales Model Plan for Handling Major Outbreaks of Food Poisoning. The Panel has a core membership from the three regional groups in Wales, but is open to all local authorities who may wish to attend in an “observer” capacity.

Evidence of Approval of Plan by Relevant Parties

- 3.3 The model plan requires the signed agreement of four parties, i.e., the local authority, the National Public Health Service (both health protection team and the microbiology laboratory) and the Local Health Board.
- 3.4 Four of the 22 local authorities submitted plans that had been signed by all four of the contributing parties. Of the remaining 18 plans, the numbers of signatories of the contributing organisations varied from three to none although in many cases local authorities had made considerable efforts to obtain the necessary signatures.

Review of Plans

- 3.5 There was no evidence that local authorities’ individual plans had been reviewed on an annual basis as required by the model plan itself. This resulted in some out of date references to legislation, codes of practice and contact details. There was evidence that some local authorities had undertaken sporadic reviews. The model plan template had been formally reviewed by the Communicable Disease Technical Panel in 2004. All

local authorities had been given the opportunity to contribute via this process.

Staff Resources

3.6 Each of the 22 Unitary Authorities indicated that staff involved in the investigation and management of food related infectious disease outbreaks also undertook other duties. These were primarily other food related work and health and safety.

3.7 Local authorities submitted evidence of the staff resource routinely available to them for the investigation of food related infectious disease. Due to the reactive nature of the work the resource required at any given time will vary. However, all local authorities indicated that they could call on additional resources during a major outbreak.

Key Appointments

3.8 Each of the 22 Unitary Authorities had identified a proper officer, a food examiner and a public analyst.

Food Service Plan

3.9 Eleven of the 22 Unitary Authorities had drafted their food service plan in full accordance with the service planning guidance contained within the Framework Agreement. The remaining local authority service plans followed the guidance to a degree but did not contain all of the necessary elements, for example, details of resources required.

3.10 Eleven of the 22 Unitary Authorities had submitted their food service plan for approval by the relevant member forum in accordance with the requirements of the Framework Agreement.

Training

3.11 There was evidence that a considerable amount of training in relation to infectious disease control had taken place. All local authorities were engaged in the "lead officer" training programme developed jointly in 2002 by the Communicable Disease Technical Panel and the Wales Centre for Health and supported by the Food Standards Agency. Other local training also took place. There was evidence that local authorities had considered infectious disease control when assessing the training needs of their authority/officers. In some cases, records provided by local authorities were not as comprehensive as required by the Framework Agreement.

- 3.12 In recognition of the need for a training programme the Communicable Disease Technical Panel has undertaken to include in its work programme a task to identify the core and ancillary modules necessary for officers to gain the required competency in the communicable disease function. The Panel will set out a programme of training which will be available to all local authorities.
- 3.13 In order to maximise the benefits of the Lead Officer training a number of authorities were holding internal cascade training events for those officers who were not part of the Lead Officer training programme.

Local Authority Liaison

- 3.14 Liaison between local authorities generally varied according to their geographical location. In south east Wales, meetings have been established specifically to discuss communicable disease matters. In north Wales, communicable disease is frequently featured on the agenda of the North Wales Food Safety Task Group. However, In south west Wales, meetings to discuss communicable disease appear not to have been held in recent years and there is no evidence that communicable disease matters have been on the agenda of the South West Wales Food Safety Task Group meetings.
- 3.15 Local authorities in south east Wales submitted evidence of attendance at further liaison group meetings. These meetings were attended by local authorities, National Public Health Service staff including consultants in communicable disease control, microbiological and laboratory staff and health protection nurses. There is no evidence that these particular arrangements are replicated elsewhere in Wales.

Implementation of Plans for Handling Major Outbreaks of Food Poisoning

- 3.16 Detailed consideration of the investigation of individual outbreaks was not within the scope of the audit. Eleven of the 22 local authorities had implemented their plan during the investigation of an outbreak. The remaining local authorities reported that no outbreaks had occurred in their areas. Four of the local authorities had taken formal enforcement action following their outbreak investigations.
- 3.17 The model plan indicates that local authorities should conduct a simulation exercise in the absence of an outbreak occurring in a two year period. None of the eleven local authorities that had not been required to implement their plans in respect of an outbreak had undertaken such an exercise. The Communicable Disease Technical Panel acknowledges the importance of outbreak simulation exercises and is considering how best it can assist local authorities to undertake this work.

- 3.18 From the evidence submitted by local authorities there were some clear trends in the implementation of outbreak plans. For example, in very few cases were minutes of outbreak control team meetings produced. The Food Standards Agency was not routinely notified of outbreaks and did not normally receive copies of outbreak control reports. The records of outbreaks reported by local authorities were not always consistent with those recorded by the Communicable Disease Surveillance Centre (CDSC).
- 3.19 The report published by the outbreak control team following the outbreak of E. coli O157 that occurred in September 2005 demonstrated that the plan had been implemented effectively by all parties.

Out of Hours Contact Arrangements

- 3.20 Local authorities reported a variety of arrangements to deal with the notification of outbreaks out of normal office working hours. The vast majority of local authorities, eighteen in total, relied on appropriate officers being contactable on a goodwill basis through a central council emergency / out of hours contact number. The remaining four local authorities reported that their public protection departments operated a formal out of hours duty rota system whereby officers received payment but some contact with officers authorised for food safety and communicable disease may still rely on goodwill. One local authority reported that a bid had been made to fund a formal out of hours service and anticipated arrangements being in place in the near future.
- 3.21 As part of the audit a test exercise of local authority emergency out of hours arrangements was carried out on 15th August 2007. For completeness, Swansea Bay Port Health Authority was also included in the exercise. Agency staff endeavoured to contact local authorities using the details contained in the Directory of Environmental Health Departments, which was issued 9th May 2007, with the aim of reaching an appropriately authorised officer.
- 3.22 In 15 local authorities the Agency was able to make contact with an authorised officer either directly or following an initial response from a central call handling facility. Where the telephone was not answered voice mail messages were left. Two local authorities were unable to provide any response within a two hour period. At the conclusion of the exercise a final message was left to confirm that the Agency had been conducting a test exercise and that no further action was required. In the remaining six local authorities the initial telephone calls were answered but Agency staff were either advised that no authorised food safety / communicable disease officers were available or no further contact resulted from the

original conversation. Where there had been no response the Agency staff rang again to confirm the nature of the exercise.

3.23 A letter was issued to Directors of Public Protection Wales the following day to inform them of the exercise and its findings. An invitation was extended for them to contact the Agency if need be to determine what individual authority responses had been. Follow up action was taken by asking that evidence of appropriate authorisation be provided by each of the 15 local authorities where successful contact had been made.

Outbreak Control Plans

3.24 The model plan, and consequently the individual local authorities' Outbreak Control Plans, are comprehensive in nature and have chapters and appendices dealing with:

- Introduction
- Management and Organisational Arrangements for Handling Outbreaks
- Determination of an outbreak
- Outbreak Report
- Review
- Legal responsibilities
- Roles of local authorities, local health boards, the national Public Health Service and other agencies
- Outbreak Control Team
- Tasks of the Outbreak Control Team
- Media Relations
- Dealing with multi district outbreaks
- Management of outbreaks of foodborne illness (Department of Health guidance document)
- Fitness to Work; Department of Health (Guidelines)
- Out of Hours Emergency Arrangements
- Exclusion Procedure – NPHS Guidelines
- Food Safety Act 1990 Code of Practice
- Points of Contact
- Standard letters, forms and documents
- Pathological Specimens in the Post
- Suggested format for Outbreak Reports where an OCT is convened
- Lead Officer
- Notification
- Authorisation
- Review

3.25 A copy of the model plan can be viewed as a separate Annex to this report.

3.26 Local authorities submitted a number of examples of standard letters and helpful advisory leaflets that are used in connection with their communicable disease investigatory work.

SECTION 4: DISCUSSION

- 4.1 The audit highlighted a commonality of approach to the control and investigation of outbreaks of food related infectious disease by all Welsh authorities. This is primarily due to the work of the Directors of Public Protection Wales Communicable Disease Technical Panel. One of the tasks that the Panel has carried out is the drafting of a model plan template for handling major outbreaks of food poisoning in collaboration with the National Public Health Service, the National Assembly for Wales and the Food Standards Agency Wales. All 22 local authorities had prepared local Outbreak Control Plans based on this template.
- 4.2 Since 2002 all Welsh local authorities have adopted the “lead officer” approach to the control and investigation of food related infectious disease by nominating officers who will assume responsibility in the event of an outbreak, liaising with neighbouring local authorities, the National Public Health Service, Local Health Boards and other organisations, including the Food Standards Agency, as necessary.
- 4.3 A significant amount of valuable training has been provided for lead officers since 2002. This has been co-ordinated by the Communicable Disease Technical Panel in collaboration with the Wales Centre for Health.
- 4.4 The commitment to liaison and discussion between local authorities and with other parties regarding communicable disease issues was not consistent across Wales. It was particularly strong in south east Wales, and evident in north Wales but arrangements in south west Wales had lapsed in recent years.
- 4.5 A number of local authorities submitted examples of standard letters, information sheets and questionnaires that they used during the investigation of notifications of food related infectious disease. Some of these documents, in particular the information sheets, had been widely used in relation to the control of outbreaks. However, it is recognised that the standard correspondence had been tailored to meet specific outbreak circumstances.
- 4.6 Out of hours contact arrangements varied across the 22 Unitary Authorities and the Port Health Authority. This was evidenced by the results of the test exercise of local authority emergency out of hours arrangements carried out by the Agency on 15 August 2007 (paragraph 3.21 refers). Although a number of local authorities had formal out of hours arrangements, it was evident that an assured response from an officer authorised to enforce food safety and communicable disease legislation generally relied on goodwill and the availability of those officers.

In only a few instances was there a guaranteed response from a suitably authorised officer.

- 4.7 Each local authority had identified staff who were engaged in the routine investigation of food related infectious disease. All staff taking the lead in the control and investigation of food related infectious disease proactively carried out other tasks such as the inspection of food businesses. Every local authority had identified that additional staff could be called upon in the event of a major outbreak occurring.
- 4.8 There was a variation in the recording of outbreaks of food related infectious disease as data held by the Food Standards Agency, National Public Health Service and Communicable Disease Surveillance Centre differed. The Food Standards Agency had not been notified of all of the outbreaks of food related disease that occurred in Wales.
- 4.9 The majority of local authorities referred to a review that was undertaken by the Communicable Disease Technical Panel in 2004. However, the plans of individual local authorities had not been reviewed on an annual basis in accordance with the said plan.

SECTION 5: AUDIT FOLLOW UP AND FUTURE AGENCY ACTION

- 5.1 All authorities and the port health authority have been contacted directly with the outcome of the focused audit relevant to their authority. The Agency will follow up as necessary to ensure that any identified areas for improvement have been addressed.
- 5.2 The Agency will disseminate the good practice that it has identified to local authorities in Wales. The summary finding of good practice identified during this focused audit can be found in Section 6 of this report.
- 5.3 The Agency will encourage a system of cascade training within and between local authorities so that the main principles of the lead officer training covering food related infectious disease are disseminated.
- 5.4 The Agency will work with the Communicable Disease Technical Panel in its delivery of identifying the core and ancillary modules necessary for officers to gain the required competency in the food related infectious disease function (paragraph 3.12 refers).
- 5.5 The Agency will work with the Communicable Disease Technical Panel in how best to assist local authorities with outbreak simulation exercises (paragraph 3.17 refers).
- 5.6 The Agency will assist the Communicable Disease Technical Panel in improving reporting mechanisms between all agencies (paragraphs 3.18 and 4.8 refer).

SECTION 6: GOOD PRACTICE

- 6.1 There were excellent liaison arrangements between local authorities and the National Public Health Service in south east Wales. An example of how these arrangements were carried out was the quarterly meeting attended by local authorities, National Public Health Service and infection control practitioners. The minutes of these meetings demonstrate that they are a useful forum for discussion on infectious disease matters and also for building networks of communication more generally.
- 6.2 Some local authorities were utilising a suite of standard leaflets and documents for food related infectious disease control. These provided effective and consistent communication to the public. Examples of these are leaflets giving advice on organisms such as E. coli O157, salmonella and campylobacter and standard letters for use during the investigation of outbreaks.
- 6.3 A number of local authorities were utilising the principles of cascade training in order to obtain full benefits for their authority from the lead officer training scheme and other relevant training that had been attended.

Auditors: **Jane Davies**
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Appendix 1

Unitary Authorities in Wales

Isle of Anglesey County Council
Blaenau Gwent County Borough Council
Bridgend County Borough Council
Caerphilly County Borough Council
Cardiff Council
Carmarthenshire County Council
Ceredigion County Council
Conwy County Borough Council
Denbighshire County Council
Flintshire County Council
Gwynedd Council
Merthyr Tydfil County Borough Council
Monmouthshire County Council
Neath Port Talbot County Borough Council
Newport City Council
Pembrokeshire County Council
Powys County Council
Rhondda Cynon Taff County Borough Council
City and County of Swansea
Torfaen County Borough Council
Vale of Glamorgan Council
Wrexham County Borough Council