



Improving Performance in Food Safety

Vanguard (Scotland) Ltd

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Introduction

The purpose of this report is to discuss the research carried out by Vanguard into two local authority Food Health and Safety departments and to share an understanding of how the setup of the wider system has encouraged these departments to develop poor working practices.

The City of Lincoln Council and Great Yarmouth Borough Council separately invited Vanguard consultants to review their food safety departments with an eye to improving their performance. Both believe the findings may apply to many of their peer organisations.

Great Yarmouth and Lincoln are both tourist cities and attract a large working and leisure populace from outwith their boundaries; therefore their food outlets serve a much larger volume than just the resident populations. With responsibility for over 1,400 and 1,000 food businesses respectively, each small council team was enormously overworked and under great pressure to achieve targets. Both department managers had repeatedly requested more staff, but in the face of budget cuts this was impossible.

Management in both departments felt it might not be possible to make any significant improvements within what they saw as a constrictive regulatory environment but the Food Standards Agency has been both supportive and interested in the results achieved. Both sites have been able to make incredible broad ranging improvements in areas as diverse as their relationships with local food businesses, staff morale, service resilience, capacity and of course the priority – food safety.

Researching the existing systems

The first stage when looking to improve any process must be to get knowledge about how the service works today and why. Both council teams thought they already knew their systems well and had many statistics about the performance of their services. Despite this they had the courage to throw away preconceived ideas and look afresh at their performance from a new perspective; the perspective of their purpose and how well they were achieving it.

Establishing what the department's purpose was turned out to be revelatory for both sites.

Great Yarmouth realised that they had been working on the basis that their purpose was to be an enforcement unit. This thinking had warped their behaviour and negatively affected their performance.

Lincoln similarly realised that they had been focusing solely on meeting the FSA targets, and began to recognise that this thinking had given rise to poor working practices.

In both instances when the organisations returned to the idea that their overriding purpose was to protect public food health, they saw their performance, metrics and processes in a very different light.

The managers felt this damaging focus had been developed because the Food Standards Agency Code of Practice dictated not only what should happen within a service, but exactly how it should happen.

Great Yarmouth

What this translated to on the ground at Great Yarmouth was the manager allocating a number of inspections to the team, which they would be expected to deliver. The form these inspections took is what one Environmental Health Officer called “compliance based inspections - checking of findings against a list of legislation”. Afterwards, they would head back to the office to send letters to the businesses about what they would need to do to comply with the legislation.

Mapping the flow of a typical inspection revealed it took a total of 184 steps to complete. 116 of these came about because the Environmental Health Officer had to return to the office to ‘sign off’ a piece of work, handing it to a total of 11 different sections to produce a letter and send it to the food business in question. These letters would often take over 2 weeks to arrive.

The de-facto purpose consisted of meeting the targets set for the numbers of inspections carried out. The computer system reinforced this relentless focus on inspections, designed to log that businesses had been visited within the specified time. There was no incentive to notice new traders and enter them on the computer system as they just added to the already stretched inspection list, so they were avoided for as long as possible. Once noticed they would be sent a form to register and a leaflet and unless the business chose to return this documentation they would not be entered onto the computer system.

Paperwork was the only communication focus. Every visit generated a letter. At each stage there was an escalation that was focused on enforcement and finally prosecution for the high risk businesses.

The measures in this system could not tell us whether these actions had either negatively or positively affected the safety of food businesses as they solely focussed on compliance.

Lincoln

As at Great Yarmouth, the existing method of performance management was to measure the percentage of inspections that the team had completed within 28 days of the date the premises were due for inspection. By this measure they were doing fine and there were no problems.

However, the focus on working to the due date target was leading staff to organise their workload so that the most compliant premises (which they knew were going to be the fastest to inspect) were dealt with first. The worst premises would take the longest so were addressed last to minimise any negative effect on the target. Whilst this meant a high percentage of inspections were completed within 28 days of their due date, any remaining cases which overran the target were largely the premises which represented the highest risk to public health and these were now taking much longer to be addressed.

Officers were being driven by their obligation to get the highest number of inspections done as quickly as possible, rather than by which sites were posing the highest risk to public health.

Paperwork was similarly an issue with the primary method of communication with businesses being letters and with individual officers trying to juggle a workload of up to 60 open cases at a time.

Lincoln did have measures which told us how long it was taking to make food businesses safe. However the focus on the inspection target and the behaviour it drove lead to a lot of variance in how long it took to bring unsafe businesses to compliance. Whilst the average was 65 days, in some instances it could take up to 194 days to bring them up to code.

Different Sites, Similar Problems

No-one was happy in these systems. Staff morale at both sites was poor. Business's reaction to Food Safety teams was often negative, and sometimes openly hostile. Improvements in food safety standards were often very slow. The paperwork in the systems were drowning the departments and both had been obliged to draft in outside help to clear backlogs.

The Redesign

When the reality of the situation had been investigated both councils agreed to experiment with redesigning their systems with the focus on the target and enforcement letters replaced with a focus on ensuring that food for public consumption is safe. This is the same goal as motivates the FSA regulations and the FSA was supportive and curious to see the results.

Removing the Target

At Lincoln the officers redesigned the workflow from scratch taking cases on a first in first out basis with a maximum limit of 6 cases per person at any one time.

They prioritised the highest risk cases and spent as much time with them as was needed. To gain the time needed for this they reduced the inspections of the most persistently and reliably safe businesses. The priority was always on where there was the greatest need.

To reinforce this altered priority they rewrote their measures to ensure they were taking data on what really mattered, having learned that what you measure shapes the priorities of those providing and monitoring the data.

Then they rewrote the council's food health and safety operations manual which they could now look upon not as a fixed document but as a guide that evolved with the needs of the operation.

Focusing on Risk

At Great Yarmouth, having analysed their inspection style, the team understood that when they told food producers to do things that made no sense to them, they lost respect. Just telling them, 'the legislation says so', was inadequate.

The team gave careful thought to the spirit of the legislation and why it was there in the first place. They decided to differentiate between safe and unsafe non-compliance. Significant weighting would be given to any breaches found to be in the unsafe category because if they were not addressed there would be a real risk to food safety.

Ms Sealey, Commercial Team Manager at Great Yarmouth said: *'Whereas in our old system we saw a procedural problem and would tie it to a piece of legislation and tell them they can't do it, we started to talk to them as professional people and make an assessment directly related to our purpose, "is that food business producing safe food?"'*

Communication and Education vs. Enforcement

As staff at both sites looked and more importantly listened to the businesses they were inspecting they began to see that no-one was very interested in the follow up letters. At Great Yarmouth they learned that the written documentation left at the time of the visit was more important. Business operators wanted inspecting staff to engage with them on the spot, explain what was required and why and, where needed, demonstrate how to do it right. They also, to the great surprise of the inspectors, wanted them to come back after they had made the improvements to confirm they had it right and to show off their positive progress.

At Great Yarmouth they began experimenting with techniques to show bad businesses how unsafe they were. These ranged from simply discussing what they were doing in terms of real risk and potential harm to their customers, to totalling up maximum fines and showing the business on a graph where they ranked in terms of other businesses in the borough. The impact of this moved some business operators to tears. It also facilitated a significant change in many who had previously been resistant.

Other long term issues were also resolved by this new approach. A bakery that has been in operation for over 100 years had struggled to comply in the old system and had received a number of Hygiene Improvement Notices in the past to enforce compliance. By taking the time to talk and listen it was found that the operator had often misunderstood what was needed, linking the work to financial cost when in fact they needed to learn how to clean properly. No one had ever picked up before that the operator could not read or write. By leaving photographs highlighting the problems found on inspection rather than sending a letter, dramatic improvements were made.

Relationships with food producers improved while businesses that had a historically poor food safety record suddenly showed significant progress. Whilst the full range of enforcement actions are still available they haven't been needed. With a focus on explaining and educating in person, enforcement actions have been significantly reduced at Great Yarmouth and focus mainly of structural defects rather than procedural requirement.

Dealing with New Businesses

Whereas when working to the target new businesses had just represented an additional burden to be added to an already long work list, the new priority of working to make food safe totally changed attitudes towards this segment. Officers were now highly motivated to actively seek out new businesses to ensure they were safely trained in good practice from as early a stage as possible. New business owners contacted in this way have responded very positively and have been keen to get help and advice to ensure they are doing the right thing.

Faster results

By focusing on in person communication and visits instead of letters the burden of paperwork fell away and the speed at which businesses were made safe rocketed. At Lincoln where comparable before and after figures were available the average number of days from inspection of a bad business to it being made safe dropped from 65 days to just 7 days under the new system; an 89% improvement.

Capacity

Both sites had previously been asking for more staff and had required help to clear periodic backlogs. By altering their approach both had now gained increased capacity enabling each of them to release a team member, though Lincoln (who having only been running the new method for 6-months) are only trialling loaning a member of staff back to the wider Environmental Health Team rather than permanently reassigning them until they have run the new system for a full year.

Staff Morale

Staff morale was utterly transformed. Comments were overwhelmingly positive but time to focus on the businesses that needed more attention and much increased job satisfaction were the two most commonly expressed sentiments. Here are just some of the staff reactions:

"For me, the greatest benefit of the way in which Systems Thinking has been adopted within the Food, Health and Safety team is that it has allowed me to prioritise the work activities that provide the highest level of service and protection of health to the Council's customer - the public."

"Before the intervention I was starting to lose sight of why I had become an Environmental Health Officer.... In contrast since going through the intervention I take a lot more pride in my work, and the sense of achievement that my time and effort has actually made a difference is now felt most days."

"I can't believe something so simple could so radically change my thinking, my way of working and increase the feeling of YES I want to come to work today!"

Conclusion

In both Councils the teams found that focusing on targets and paperwork was proving an ineffective approach to making food in their area safer. Focusing instead on making food safe and changing the approach to one of people interacting with people, educating, explaining and demonstrating, has transformed the results gained by each council. Relations between the councils and businesses have turned from confrontational to cooperative. Unsafe practices are being addressed faster and new food businesses are proactively educated on operating safely. Staff are engaged and motivated by being able to help make a difference. Workloads are being managed more easily and on the basis of public health. It is safer to eat in these two Councils than ever before.

Vanguard management consultants work with private and public sector managers across the UK, Europe and North America to improve service for the customer and results for the organisation. To talk to Vanguard about the needs of your area call us on 0131 440 2600 or email office@vanguardscotland.co.uk