

Appendix A:

Submissions and comments

We have consulted with DH, Casey, Geelong, Hepburn, Kingston and Manningham, and we considered their views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to that agency or council and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the agency head.

Responses received

Agency or council	Page
Department of Health	A-2
City of Casey	A-7
City of Greater Geelong	A-12
Hepburn Shire Council	A-15
City of Kingston	A-21
Manningham City Council	A-24

Response provided by the Secretary, Department of Health



Secretary

Department of Health

50 Lonsdale Street
Melbourne Victoria 3000
Telephone: 1300 650 172
GPO Box 4057
Melbourne Victoria 3001
www.health.vic.gov.au
DX 210081

BAC-CO-36470

Andrew Greaves

Auditor-General

Via e-mail: [REDACTED]

RE: Proposed Report – Regulating Food Safety

Dear Mr Greaves

Thank you for your correspondence of 18 May 2023 and the proposed report for *Regulating Food Safety*. In accordance with the Audit Act 1994 (the Act), I have considered your report and wish to provide a submission in response to your recommendations.

I accept the recommendations provided by the Victorian Auditor-General's Office and attached to this letter you will find the department's action plan to address these recommendations.

I note that the proposed report will be tabled in Parliament and that under the Act, I am responsible for protecting the confidentiality and security of this information.

Thank you for the opportunity to respond to these recommendations. Should you wish to discuss this matter further, please contact Dr Angie Bone, Deputy Chief Health Officer (Environment) at the Department of Health on [REDACTED].

Yours sincerely

[REDACTED]

Professor Euan M Wallace AM
Secretary

29/05/2023



**Department of Health action plan to address recommendations from
*Regulating Food Safety***

No.	VAGO recommendation	Action	Completion date
1	Recommendation 4 Reviews the regulatory arrangements and provides advice to the government to: <ul style="list-style-type: none"> address the risk that owners of food premises using online platforms are not registering their business. This includes a requirement to display the owners name, registration number and registering council prominently on any online profile 	Accepted Conduct a review of the regulatory arrangements of how businesses that sell food using on-line platforms can demonstrate that they are registered with their council. The review will be conducted in consultation with in-scope food businesses and councils, following which recommendations will be presented to the Minister on how this issue can best be addressed.	30 June 2024
2	Recommendation 4 Reviews the regulatory arrangements and provides advice to the government to: <ul style="list-style-type: none"> assess whether the requirement for councils to reinspect food premises in the 3 months before renewal of registration for <ul style="list-style-type: none"> all non-compliant premises any food premises that received a complaint 	Accepted Councils should resolve non-compliances within a reasonable timeframe from when they were first identified and investigate complaints as soon as practical. Mechanisms already exist in the <i>Food Act 1984</i> that permit councils to increase frequency of inspections per registration period for poor performing businesses. To remove this requirement there must be an amendment to the <i>Food Act 1984</i> . The department will seek the next opportunity to amend the Act to remove this provision.	30 December 2024
3	Recommendation 5 Improve consistency in councils' compliance ratings of food premises by annually: <ul style="list-style-type: none"> collecting, analysing and reporting on councils' food premises compliance rates investigating compliance rate variances 	Accepted The department notes consistent provision of data by councils and data sharing agreements will be important in achieving this recommendation. The completion of the FoodTrader/ OSCAR system for managing the regulation of fixed food premises later this year is expected to assist obtaining the required data that will permit the Department to: <ul style="list-style-type: none"> investigating compliance rate variances of user councils; and 	30 December 2024

OFFICIAL

Response provided by the Secretary, Department of Health – *continued*

	<ul style="list-style-type: none"> educating councils 	<ul style="list-style-type: none"> develop strategies on educating councils that either have very high or very low food premises compliance rates. <p>But this will only be for the councils that opt to use FoodTrader/ OSCAR</p> <p>For councils not using FoodTrader/ OSCAR for managing the regulation of fixed food premises, the department will need to provide these councils with instruction on how to improve the data that they submit to the Department as currently, it lacks sufficient detail. This will result in councils needing to consult with their system vendors and may result in expense to councils. Whilst the Department will complete this work during 2024 there is no guarantee that councils (not using FoodTrader/ OSCAR) will update the data they need to send the Department. The Department can make councils to comply.</p>	
4	Recommendation 6 Complete and implement the Public Health Workforce Plan to address the statewide shortage of environmental health officers	Accepted The department is developing a "Victorian Health Workforce Strategy", intended to be published in July 2023. The department will then build on this and leverage internal expertise to deliver a "Public Health Workforce plan" in the 2023/24 financial year.	30 June 2024
5	Recommendation 7 Address in collaboration with councils, the need for its statewide risk-based food sampling strategy to consider: <ul style="list-style-type: none"> trends in pathogens and foodborne bacteria high-risk foods opportunities for improving education 	Accepted This allows time for the department to undertake consultation and develop a statewide risk-based food sampling strategy that includes: <ul style="list-style-type: none"> trends in pathogens and foodborne bacteria; high-risk foods; opportunities for improving education. 	30 December 2024

OFFICIAL

Response provided by the Secretary, Department of Health – continued

6	<p>Recommendation 8</p> <p>Design and implement performance measures and targets that measure achievements against:</p> <ul style="list-style-type: none"> key objectives of the <i>Food Act 1984</i> at both a statewide and council level food safety outcomes such as reduction in foodborne illnesses over time, results of enforcement actions and quality of compliance activities 	<p>Partially Accepted</p> <p>The department will develop performance measures and targets that measure achievements against key objectives of the <i>Food Act 1984</i> at both a statewide and council level, noting the quantum of measures and targets will need to be staged.</p> <p>This is because being able to collect the required quality data from both councils and laboratories (and other possible sources yet to be identified) will need to be negotiated with those agencies. In addition, capability in the department data systems and staff will require time to be developed.</p> <p>It is forecasted that some measures and targets will begin being reported on by the end of 2024 and expand in the following years.</p> <p>With respect to measuring food safety outcomes such as reduction in foodborne illnesses over time. The department advises that data on cases of diseases that may be foodborne are available at: https://www.health.vic.gov.au/infectious-diseases/interactive-infectious-disease-reports. The department advises that there are some limitations as indicators of food safety system performance. For example, the same pathogens can be transmitted by other routes (such as water or pets) and many foods are manufactured in other Australian states or imported from overseas. In addition, food safety outcomes are also highly contingent on environmental and climate change and primary production conditions and regulation.</p>	30 December 2024
7	<p>Recommendation 9</p> <p>Annually publish the Food Act report, including:</p> <ul style="list-style-type: none"> performance against measures and targets analysis of the types of food complaints, investigation outcomes and emerging food safety risks council performance on food sampling, results and trends 	<p>Accepted</p> <p>The department intends to return to annual publication as required.</p> <p>Annual reports will be up to date by the end of 2023.</p>	30 December 2023

OFFICIAL

Response provided by the Secretary, Department of Health – continued

8	<p>Recommendation 10</p> <p>Improve council guidance and training by:</p> <ul style="list-style-type: none">• collaborating with councils in developing a co-designed model for guidance and training• reviewing and updating guidance to ensure it reflects emerging trends and risks• developing and delivering regular training for new environmental health officers and more advanced practical and refresher training, to ensure a consistent standard of skills across the state• undertaking council surveys to measure whether Department of Health's guidance and training is meeting council needs	<p>Accepted</p> <p>The department acknowledges the importance of continuous improvement of guidance and training provided to councils.</p>	30 June 2024
---	---	---	--------------

OFFICIAL



1 June 2023

Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Level 31/ 35 Collins Street
Melbourne VIC 3000

Email: [REDACTED]

Dear Mr Greaves

Proposed Report - Regulating Food Safety – Casey Comments

Further to City of Casey correspondence on 3 May 2023, thank you for the previous opportunity to provide comments on the provisional report into Regulating Food Safety. Council acknowledges the acquittal to the matters raised and appreciates VAGO's consideration in these matters.

In response to the correspondence dated 18 May 2023 and the request for Council's action plan to address the recommendations, please see the attached document. We welcome future engagements for monitoring purposes.

If further information or clarification is required, please do not hesitate to contact Daniel Osborne on telephone [REDACTED] or email [REDACTED].

Yours sincerely



Holly De Kretser
Manager Corporate Governance

Attached: City of Casey action plan to address recommendations from Regulating Food Safety

Web: casey.vic.gov.au
Email: caseycc@casey.vic.gov.au
Phone: 03 9705 5200
Post: PO Box 1000, Narre Warren VIC 3805

TIS: 131 450
(Translating and Interpreting Service)
NRS: 133 677
(for the deaf, hearing or speech impaired)

Customer Service Centres:
Narre Warren: Bunjil Place, Patrick Northeast Drive
Cranbourne: Cranbourne Park Shopping Centre
ABN: 43 320 295 742



City of Casey action plan to address recommendations from Regulating Food Safety

No.	VAGO recommendation	Action	Completion date
1	<p>Develop a workforce plan that:</p> <ul style="list-style-type: none"> Reflects realistic environmental health officer caseloads Considers the time needed to adequately undertake food safety obligations Reassigns non-critical tasks from environmental health officers to other staff or authorities. 	<p>Recommendation One Accepted</p> <ol style="list-style-type: none"> In collaboration with People and Culture team, develop a Public Health Workforce plan that considers internal and contractor resources and addresses the VAGO recommendation. Undertake a time survey of food safety work tasks and determine adequacy to ensure food safety obligations are effectively being met. Review tasks undertaken by EHO's and consider non-critical tasks re-allocation to other staff or authorities were appropriate. Document changes applied. <p>We note achievement of this recommendation will partly be dependent on the findings/ outcomes of recommendation 6 and the Department of Health's Public Health Workforce state-wide plan in addressing EHO shortages.</p>	Develop a workforce plan – 30 June 2024
2	<p>Develop or strengthen a plan for:</p> <ul style="list-style-type: none"> Completing annual assessments and inspections Conducting regular surveillance to identify unregistered food premises Regularly monitoring and reporting performance 	<p>Recommendation Two Accepted</p> <p>Completing annual assessments and inspections</p> <ol style="list-style-type: none"> Review and report on changes (if applicable) to "Assessment/ Mandatory Inspection of a Food Premises – FP16V Procedure." Review and report on changes (if applicable) to the following report types in Health Manager: <ul style="list-style-type: none"> Operational – Total premises number by class Operational – Total inspections completed by premises class – current year to date Master officer reports – Total inspections completed by inspection type LGPRF Reports – Total number Class 1 2 premises LGPRF Reports – Total Class 1 2 inspections completed 	Completing annual assessments and inspections – 31 December 2023

	<p>3. Undertake routine monitoring of annual assessments and inspection data and discuss in operational catch-up meetings between Council and Contractor on required actions to meet inspection targets.</p> <p>4. Continue to report routinely to Department of Health on Councils food premises compliance rates to aid in consistency.</p> <p>5. Continue to promote the “Assessment/ Mandatory Inspection of a Food Premises – FP16V Procedure” amongst the Environmental Health Shared Service to aid in consistency between City of Casey, Cardinia and Bass Coast Councils.</p> <p>Conduct regular surveillance to identify unregistered food premises</p> <p>1. Undertake an initial review of online marketplace websites (e.g. Facebook marketplace, Gumtree, ebay etc) and food sharing platforms (e.g. UberEats, Menu log, DoorDash) to understand risk and extent of issues relating to unregistered food premises. Develop recommendations based on data gathered to support the development of an active surveillance program for unregistered food businesses.</p> <p>2. Develop a process to support active surveillance of unregistered food premises within the municipality. This process will be based on risk-based surveillance strategies that:</p> <ul style="list-style-type: none"> • Set out actions to mitigate the risk of unregistered food premises operating, • Address risks identified through an assessment of unregistered food premises found to be operating in the municipality. This will incorporate non-traditional locations for new food premises, • Actions to be prioritized and EHO resources allocated based on risks identified. <p>3. Frequency of “regular surveillance” to be determined through understanding the extent of the problem and if businesses are being identified through BAU EHO field work responsibilities. It’s anticipated a review (either desktop or in-field) will occur at a minimum every 12 months.</p> <p>4. Review and report on changes (if applicable) to “Unregistered Food Premises – FP30V procedure”.</p>	<p>Conduct regular surveillance to identify unregistered food premises – 30 June 2024</p>
--	---	---

	<p>We note councils' success in achieving recommendation 2 is dependent, in part, on the Department of Health's implementation of recommendation 4 in relation to greater controls for online platforms.</p> <p>Regularly monitoring and reporting performance</p> <ol style="list-style-type: none"> 1. Report on the outcomes of Regulating Food Safety VAGO report to councils Audit and Risk Committee. 2. Review processes in monitoring and reporting performance, with a particular focus on food safety risks. Investigate potential food safety indicators and targets that can be used for internal reporting and to understand councils food safety performance against its obligations. 3. Review Performance reporting Indicator Guide and application to data collected to address LGPRF indicators. With a particular focus on ensuring removing closed premises in the number of assessments and number of premises data. Also ensuring data is collected and reported on a calendar year as opposed to financial year where required. 	<p>Regularly monitoring and reporting performance – 31 December 2023</p>
3	<p><i>Use results of assessments, inspections, food sampling and complaints to develop education programs for owners of food premises that address food safety risks.</i></p> <p>Recommendation Three Accepted</p> <ol style="list-style-type: none"> 1. Evaluate Allergen Management education program and determine effectiveness and future needs for allergen management education. 2. Evaluate Food Sampling Program and determine effectiveness, future needs and application to future education programs. 3. Evaluate Voice of the Customer (VOC) program data as it related to complaints to food premises and application to future education programs. 4. Evaluate what results can be extracted from existing Health Manager system to support future education programs. 5. Develop a formal education strategy/ policy that is informed by: <ul style="list-style-type: none"> • Needs analysis of food premises (such as culturally and linguistically diverse owners, low literacy levels, or significant high-risk businesses and food products). • Issues or findings arising from assessment, inspection and sampling. 	<p><i>Use results of assessments, inspections, food sampling and complaints to develop education programs for owners of food premises that address food safety risks - 30 June 2024</i></p>

		6. Identify changes required to Health Manager Database and incorporate into HM1 upgrade to improve data capture of assessments, inspections, food sampling, complaints and as a tool to better analyse food safety risks to inform education programs. Completion date of this recommendation to align with HM1 update.	Health Manager Database system improvements – 31 December 2024
--	--	--	--

CITY OF GREATER GEELONG

WADAWURRUNG COUNTRY P: 03 5272 5272
PO Box 104, Geelong VIC 3220 E: contactus@geelongcity.vic.gov.au
www.geelongaustralia.com.au



Mr Andrew Greaves
Auditor General
Victorian Auditor General's Office
Level 31, 35 Collins Street
MELBOURNE VIC 3000

01 June 2023

Doc No: D23-266974

Dear Mr Greaves

Re: Proposed Performance Audit Report Regulating Food Safety

Thank you for your letter of 18 May 2023, providing the City of Geelong with the opportunity to comment on the proposed report on Regulating Food Safety.

Enclosed is the City of Geelong's response to the recommendations in the report and the action we intend to take, including proposed completion dates.

I would like to thank the VAGO team who worked with City officers involved in the audit for their positive and collaborative approach and for the opportunity to discuss findings and recommendations from the audit.

Yours sincerely

KARINA PHILLAND
ACTING CHIEF EXECUTIVE OFFICER

CHIEF EXECUTIVE

TELEPHONE

Attach: VAGO Action Plan

Copy To:

OFFICIAL: Sensitive

City of Greater Geelong action plan to address recommendations from *Regulating Food Safety*

No.	VAGO recommendation	Action	Completion date
1	<p>Develop a workforce plan that:</p> <ul style="list-style-type: none"> • Reflects realistic environmental health officer caseloads • Considers the time needed to adequately undertake food safety obligations • Reassigns non-critical tasks from environmental health officers to other staff or authorities 	<p>Accepted</p> <p>1.1 The City will review the case loads of EH Officers and review demand vs capacity. If required submit an FTE request as part of the 2024/2025 budget process</p> <p>1.2 Measure all inputs to understand resource requirements for regulating food safety</p> <p>1.3 The City will review the inspection and assessment procedures to reduce the administrative burden on EHO's</p>	1/3/2024
2	<p>Develop or strengthen a plan for:</p> <ul style="list-style-type: none"> • Completing annual assessments and inspections • Conducting regular surveillance to identify unregistered food premises • Regularly monitoring and reporting performance 	<p>Accepted</p> <p>2.1 The City will review its plan for completing annual food assessments and inspections based on outcomes of actions 1.1, 1.2 & 1.3</p> <p>2.2 The City will develop proactive monitoring plan for unregistered food businesses which includes on-street & on-line monitoring.</p> <p>2.3 A monthly performance report will be provided to the Manager of Health & Local Laws and the Director of Community Service Delivery</p>	31/3/2024

OFFICIAL: Sensitive

3	Use results of assessments, inspections, food sampling and complaints to develop education programs for owners of food premises and their staff that address food safety risks	<p>Partially accepted</p> <p>3.0 Whilst the City of Geelong accepts it has a role to play in providing information and educational material to food businesses on food safety, it does not accept that it is responsible for developing education programs for food businesses. This should sit with the department of health.</p> <p>3.1 We currently provide guidance and education at the conclusion of our food premises assessments/inspections. This is based on any anomalies or non-compliances found.</p> <p>3.2 The City intends to re-introduce its quarterly newsletter to food businesses, this will include any trends or items of note through the previous quarter.</p>	<p>N/A</p> <p>Complete</p> <p>1/12/2023</p>
---	--	--	---



1 June 2023

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Level 31 / 35 Collins Street
MELBOURNE VIC 3000

Sent via email to Acting Director responsible for this audit: [REDACTED]

Dear Mr Greaves,

Re: Performance Audit Report Regulating Food Safety

Thank you for your letter and for the opportunity to review and respond to the audit recommendations made to Hepburn Shire Council.

I confirm that we accept all the audit recommendations directed and am pleased to advise that work on some recommendations has already commenced. Since the time of the audit, Hepburn Shire Council have developed a Draft Food Act Compliance and Surveillance Procedure and a Draft Enforcement Policy. Outcomes of the audit have been used to inform these policies and procedures and they will include sections that address routine assessments and inspections, regular surveillance of unregistered food premises and regular monitoring and reporting.

Council thanks the Audit team for their collaborative and consultative approach, particularly with the opportunity to meet, discuss and provide a response to each of the findings or recommendations throughout the audit process.

I would also like to thank the office for acknowledging the service provided by Hepburn Shire Council has been particularly impacted by statewide recruitment challenges of Environmental Health Officers, impact of the COVID Pandemic and reallocation of resources to respond to three major storm events within the shire.

Please contact our office should you have any queries or would like any further information regarding Council's action plan to improve our regulation of food safety.

Yours sincerely,

A black rectangular redaction box covering the signature of Bradley Thomas.

Bradley Thomas
Chief Executive Officer

► **HEPBURN SHIRE COUNCIL**
ABN: 76 845 763 535
PO Box 21 Daylesford 3460
shire@hepburn.vic.gov.au
hepburn.vic.gov.au

► **DAYLESFORD**
76 Vincent Street
Daylesford
03 5348 2306
Corner Duke
& Albert Streets
Daylesford
03 5348 1577

► **CRESWICK**
68 Albert Street
Creswick
03 5345 8399

► **CLUNES**
The Warehouse
36 Fraser Street
Clunes
03 5345 3359



Hepburn Shire Council action plan to address recommendations from *Regulating Food Safety*

No.	VAGO recommendation	Council response	Action	Completion date
1	<p>Develop a workforce plan that:</p> <ul style="list-style-type: none"> • Reflects realistic environmental health officer caseloads • Considers the time needed to adequately undertake food safety obligations • reassigns non-critical tasks from environmental health officers to other staff or authorities 	Accepted	<p>Recruitment of adequately skilled Environmental Health Officers (EHOs) remains a challenge in Victoria, particularly in regional areas.</p> <p>Since the time of the audit, one of the EHO positions in the team has been reclassified to attract a more senior professional to the role.</p> <p>A service review will be conducted on the entire Health and Community Safety Team. This will consider such things as:</p> <ul style="list-style-type: none"> - Current roles and responsibilities under all Acts and Regulations. - Time needed to adequately undertake all roles and responsibilities, with particular focus on food safety obligations. - Identify any possibilities to reassign non-critical tasks, such as administrative tasks, from EHO's. - Bench marking against other Councils of similar size. <p>Results of the service review will be used to inform a workforce plan to ensure that the team is adequately resourced to meet its legislative responsibilities.</p> <p>EHO's are authorised under many Acts and Regulations and generally only perform their legislated functions. Therefore, it will be challenging to identify non-critical tasks.</p>	July 2024

► **HEPBURN SHIRE COUNCIL**

ABN: 76 845 763 535
PO Box 21 Daylesford 3460
shire@hepburn.vic.gov.au
hepburn.vic.gov.au

► **DAYLESFORD**

76 Vincent Street
Daylesford
03 5348 2306

Corner Duke
& Albert Streets
Daylesford
03 5348 1577

► **CRESWICK**

68 Albert Street
Creswick
03 5345 8399

► **CLUNES**

The Warehouse
36 Fraser Street
Clunes
03 5345 3359



2	<p>Develop or strengthen a plan for:</p> <ul style="list-style-type: none"> • completing annual assessments and inspections • conducting regular surveillance to identify unregistered food premises • regularly monitoring and reporting performance 	Accepted	<p>Since the time of the audit, Hepburn Shire Council have developed a Draft Food Act Compliance and Surveillance Procedure and a Draft Enforcement Policy. Outcomes of the audit have been used to inform these policies and procedures and they will include sections that address routine assessments and inspections, regular surveillance of unregistered food premises and regular monitoring and reporting.</p> <p>Annual Assessments</p> <p>As above, a service review will be carried out and results from this review will be used to inform a workforce plan to ensure that the team is adequately resourced to meet its legislative responsibilities.</p> <p>An inspection plan will be strengthened to ensure that annual inspections are adequately planned and scheduled.</p> <p>The plan will include:</p> <ul style="list-style-type: none"> - Monthly inspection targets based on total number of premises by classification. - Consideration of staff annual leave, rostered days off and training days. - Consideration of seasonal inspections which will be scheduled in advance e.g. sporting clubs. - Identification of premises that require additional assessments. - Requirement for the Coordinator to escalate concerns to the Executive Manager if they feel that annual inspection targets may not be met. 	July 2024
---	--	----------	---	-----------

► HEPBURN SHIRE COUNCIL

ABN: 76 845 763 535
PO Box 21 Daylesford 3460
shire@hepburn.vic.gov.au
hepburn.vic.gov.au

► DAYLESFORD

76 Vincent Street
Daylesford
03 5348 2306

Corner Duke
& Albert Streets
Daylesford
03 5348 1577

► CRESWICK

68 Albert Street
Creswick
03 5345 8399

► CLUNES

The Warehouse
36 Fraser Street
Clunes
03 5345 3359



			<p>Surveillance of Unregistered Premises</p> <p>Hepburn Shire will formalise its surveillance program as detailed in the new Food Act Compliance and Surveillance Procedure which will include:</p> <ul style="list-style-type: none"> - Council Officers pro-actively review online forums to identify any unfamiliar food businesses. - Details of unregistered food businesses will be saved on Councils record management system and actioned to the appropriate Officer. - EHO's regularly monitor fixed premises and itinerant traders within the shire as part of their normal duties and follow up on any unfamiliar businesses. - EHO's confirm the proprietor details at every inspection to ensure they have not changed. - EHO's respond to any complaints or allegations of unregistered food business. - EHO's respond to any planning referrals relating to a food premises to ensure there is a planning permit condition that requires the proprietor to obtain Food Act registration. - EHO's carry out unannounced inspections at festivals and markets. <p>Monitoring and Reporting</p> <p>The Health and Community Safety Team will restructure their quarterly reporting to ensure that all critical tasks are identified, monitored monthly and reported on quarterly.</p>	
--	--	--	--	--

► HEPBURN SHIRE COUNCIL

ABN: 76 845 763 535
PO Box 21 Daylesford 3460
shire@hepburn.vic.gov.au
hepburn.vic.gov.au

► DAYLESFORD

76 Vincent Street
Daylesford
03 5348 2306

Corner Duke
& Albert Streets
Daylesford
03 5348 1577

► CRESWICK

68 Albert Street
Creswick
03 5345 8399

► CLUNES

The Warehouse
36 Fraser Street
Clunes
03 5345 3359



			<p>Reporting will include:</p> <ul style="list-style-type: none"> - Monthly team report - Quarterly Council briefing report - Quarterly Department of Health report - Annual Local Government Performance Report 	
3	Use results of assessments, inspections, food sampling and complaints to develop education programs for owners of food premises and their staff that address food safety risks	Accepted	<p>Hepburn Shire Council is committed to using compliance data in a meaningful and effective way. Various forms of local compliance data such as food sampling results, food safety risk assessment reports, seizure notices, enforcement actions etc will be used to inform ongoing education for food businesses.</p> <p>State-wide surveillance data, food recalls and local or national food trends may also be used.</p> <p>Since the time of the audit, an education component has been included in the team's new Food Act Compliance and Surveillance Procedure which includes:</p> <ul style="list-style-type: none"> - Distribute regular food safety newsletters and/or fact sheets to food businesses. - Promote Food Safety Week within both the community and local food businesses. - Conduct regular food sampling surveys targeting a specific food type or process and share results of significance with food businesses in an engaging way. - Provide targeted education during routine food safety risk assessments, such as allergen awareness. 	December 2023

► HEPBURN SHIRE COUNCIL

ABN: 76 845 763 535
PO Box 21 Daylesford 3460
shire@hepburn.vic.gov.au
hepburn.vic.gov.au

► DAYLESFORD

76 Vincent Street
Daylesford
03 5348 2306

Corner Duke
& Albert Streets
Daylesford
03 5348 1577

► CRESWICK

68 Albert Street
Creswick
03 5345 8399

► CLUNES

The Warehouse
36 Fraser Street
Clunes
03 5345 3359



			In recognition of the importance of this work, food business education has been included in EHO's Performance and Development Plans.	
--	--	--	--	--

► HEPBURN SHIRE COUNCIL
ABN: 76 845 763 535
PO Box 21 Daylesford 3460
shire@hepburn.vic.gov.au
hepburn.vic.gov.au

► DAYLESFORD
76 Vincent Street
Daylesford
03 5348 2306
Corner Duke
& Albert Streets
Daylesford
03 5348 1577

► CRESWICK
68 Albert Street
Creswick
03 5345 8399

► CLUNES
The Warehouse
36 Fraser Street
Clunes
03 5345 3359

31 May 2023



Mr Andrew Greaves
Level 31 / 35 Collins Street
Melbourne VIC 3000

Dear Mr Greaves

Re: Proposed Performance Audit Report Regulating Food Safety

I am writing in response to your letter of 18 May 2023 in relation to the Proposed Performance Audit Report - Regulating Food Safety.

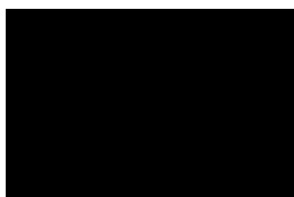
Please find attached Council's Proposed Action Plan addressing the recommendations outlined in the Audit Report.

I would like to thank the Victorian Auditor General's Office for the opportunity to provide comment on the report and for being one of the five Victorian Councils involved in this Audit.

The City of Kingston supports the findings of the Proposed Audit Report which provides Council with strong guidelines on improvement opportunities. I am confident that with the recommendations in this Proposed Audit Report and the ongoing support of the Department of Health working with the Local Government sector can implement improved service delivery.

The City of Kingston looks forward to ensuring the appropriate practices identified as part of this Audit are implemented and maintained.

Yours sincerely



Peter Bean
Chief Executive Officer

community inspired leadership

kingston.vic.gov.au

Visit us: City of Kingston, 1230 Nepean Highway Cheltenham, Monday - Friday: 8.30am - 5pm

1300 653 356 131 450 PO Box 1000, Mentone VIC 3194 info@kingston.vic.gov.au cityofkingston @kingstoncouncil kingstoncc

23/143604 PAGE 1


City of Kingston action plan to address recommendations from *Regulating Food Safety*

Issue: Audited councils are not meeting all their <i>Food Act 1984</i> responsibilities			
No.	VAGO recommendations	Action	Completion date
1.	Develop a workforce plan that: <ul style="list-style-type: none"> Reflects realistic environmental health officer caseloads Considers the time needed to adequately undertake food safety obligations Reassigns non-critical tasks from environmental health officers to other staff or authorities (see Section 2). 	The need to review and realign the workforce plan is recognised as an area of improvement. This will be addressed as follows: <ul style="list-style-type: none"> Review team roles including statutory and authorised classifications to inform task allocation and team structure Complete a time and motion study to identify indicative times to complete key tasks Use the recently completed benchmarking outcomes together with the team role analysis, to compare caseloads and determine realistic expectations Define and implement overall best practice. 	September 2023
2.	Develop or strengthen a plan for: <ul style="list-style-type: none"> Completing annual assessments and inspections (see Section 2) Conducting regular surveillance to identify unregistered food premises (see Section 2) Regularly monitoring and reporting performance (see Section 3). 	Recommendation to strengthen the plan is accepted. Council will evaluate the current plan and based on the outcome of the actions summarised under the above, enhance the plan to deliver improved outcomes. Options will be explored on the best methodology to commence active surveillance to identify unregistered food premises. Usage optimisation of Health Manager is underway to enable ease of regular monitoring and reporting.	December 2023
3.	Use results of assessments, inspections, food sampling and complaints to develop education programs for owners of food premises that address food safety risks (see Section 2).	The Recommendation is accepted in principle. Council will implement a risk protocol across all food businesses, with the objective being to provide visibility of needs as they relate to specific business types.	December 2023

community inspired leadership

kingston.vic.gov.au

Visit us: City of Kingston, 1230 Nepean Highway Cheltenham, Monday – Friday, 8.30am – 5pm

1300 653 356  131 450  info@kingston.vic.gov.au  cityofkingston  @kingstonscouncil  kingstoncc

	<p>Capturing the risk profile in Health Manager will enable reporting that in turn will inform educational needs.</p> <p>While Council has a strong role to play in educating proprietors on specific issues relating to their food business, a State developed educational program, similar to the Environmental Health Officer training referenced under Recommendation No. 10 in the Report, would yield economies of scale, consistency, and benefit to the Councils across Victoria.</p>	
--	---	--



Return Address:
PO Box 1
DONCASTER
VIC 3108

1 June 2023

Mr Andrew Greaves
Auditor General
Victorian Auditor-General's Office
Level 31 / 35 Collins Street
Melbourne VIC 3000

Your Reference: 34759

Dear Mr Greaves

Re: Proposed Performance Audit Report - Regulating Food Safety

Thank you for providing Manningham Council with a copy of the Proposed Performance Audit Report - Regulating Food Safety and for the opportunity to provide feedback to its recommendations.

Manningham Council is committed to the protection of public health and in improving our processes to achieve full compliance with our obligations under the Food Act 1984.

Council accepts the audit report's recommendations and provides the attached comments, which identifies our proposed actions.

Should you have any queries, please contact Director City Planning, Duncan Turner on [REDACTED] or by email – [REDACTED]

Yours sincerely



Cr Deirdre Diamante
Mayor, Manningham Council



Interpreter service
9840 9355

普通话 | 廣東話 | Ελληνικά
Italiano | عربي | فارسی

Manningham Council
699 Doncaster Road (PO Box 1), Doncaster, Victoria 3108
p 03 9840 9333 f 03 9848 3110
e manningham@manningham.vic.gov.au
ABN 61 498 471 081 www.manningham.vic.gov.au

Response provided by the Mayor, Manningham City Council – continued

Manningham City Council

Action Plan to address recommendations from Regulating Food Safety

VAGO Recommendation	Council Response	Action	Completion Date
Develop a workforce plan that: <ul style="list-style-type: none"> reflects realistic environmental health officer caseloads considers the time needed to adequately undertake food safety obligations reassigns non-critical tasks from environmental health officers to other staff or authorities. 	Accepted	<p>An enhanced workforce plan will be developed in responding to these recommendations.</p> <p>A more robust workforce plan will assist to ensure EHO caseloads are realistic and manageable.</p> <p>The workforce plan will take into account time demands in delivering Manningham's food safety program to ensure compliance with our statutory obligations and VAGO recommendations in keeping the community safe.</p> <p>Reassigning non-critical tasks will also factor into the revised workforce plan to ensure EHO's expertise is optimised in undertaking critical tasks.</p>	February 2024
Develop or strengthen a plan for: <ul style="list-style-type: none"> completing annual assessments and inspections conducting regular surveillance to identify unregistered food premises regularly monitoring and reporting performance 	Accepted	<p>a) Council will continue to aim to meet its inspection obligations and will strengthen internal reporting to help achieve this. This will bolster existing reporting and will allow appropriate contingencies to be introduced if it is detected that our inspection program is not on track. A more proactive approach with food businesses that fail to provide access to enable assessments to be undertaken will also occur.</p> <p>b) A cyclical surveillance program will be introduced to identify unregistered premises operating from Manningham and advertising via online platforms such as gumtree and marketplace. Council will continue to monitor for unregistered food premises at events, festivals and shopping precincts.</p> <p>c) Increased internal monitoring and reporting at management level will occur for class 3 food premises and surveillance of unregistered food businesses to ensure our statutory obligations are being satisfied throughout the year.</p>	December 2023
<ul style="list-style-type: none"> Use results of assessments, inspections, food sampling and complaints to develop education programs for owners of food premises that address food safety risks 	Accepted	<p>In addition to targeted education provided to each food business, a strategy will be developed to use results of assessments, inspections, food sampling and complaints to develop a broader education program that addresses food safety risks. March 2024 is the likely timeframe to review January to</p>	July 2024

Response provided by the Mayor, Manningham City Council – continued

		December 2023 data (in-line with LGPRF data reporting) with delivery by July 2024.	
--	--	--	--