



FOOD SERVICE

SERVICE PLAN

2017-2018



FLINTSHIRE COUNTY COUNCIL FOOD SERVICE PLAN 2017-18

INTRODUCTION

The Service Plan relates to the year commencing 1st April 2017 and ending 31st March 2018.

It covers the service provision for the Food Safety, Food Standards and Feed functions of Flintshire County Council.

The purpose of this Plan is to provide:

- Information about the scope of the Service.
- Information about the services provided.
- Information about the means of Service provision.
- Information about performance of the Food Service against Performance Targets set out in the Plan as well as against national or locally defined Performance Indicators.
- Information relating to reviewing performance in order to address any variance from meeting the requirements of the Service Plan.

Service Plans will be produced annually to allow for meaningful review and progression, in accordance not only with the requirements of the Food Standards Agency “Framework Agreement on Local Authority Food Law Enforcement” but also with the principles of the “Wales Programme for Improvement”. In respect to Feed this function has been delivered for the last 2 years (and is again this year) as part of the FSA Funded North Wales Regional Feed Enforcement Delivery Plan, with all inspection and sampling targets being set by FSA (Wales).

This Service Plan also forms part of the Authority’s commitment to delivering the aspirations of the Local Service Board to provide citizen centred services and to work in collaboration and co-operation.

FLINTSHIRE COUNTY COUNCIL FOOD SERVICE PLAN 2017-18

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1.0 SERVICE AIMS AND OBJECTIVES

1.1 Aims and Objectives

The aims of the Food Service are to:

1. Promote, through education and enforcement, the sale and/or production of food which is fit and without risk to health.
2. Prevent and control the spread of food borne illness through education and enforcement.

These will be achieved by:

- (a) Providing a complete and holistic food law enforcement service covering the areas of food hygiene and safety, food standards and animal feed in accordance with relevant food legislation and Codes of Practice, thereby fulfilling statutory obligations.
- (b) Providing a responsive service to demand driven elements such as food safety incidents, outbreaks of food related infectious disease, complaints and request for advice from both businesses and members of the public, in accordance with the National and locally defined performance indicators, relevant Codes of Practice, plans and protocols.
- (c) Assisting businesses to comply with all relevant legislation by using a balance of techniques and approaches in order to ensure the safety and well being of the Public and of the environment in line with the Public Protection Enforcement Policy 2010.
- (d) Maintaining an up-to-date database of all food establishments in the County so that resources can be effectively defined and utilised to meet statutory, national and locally defined targets of inspection, sampling, specific initiatives and tasks set by Food Standards Agency Wales (FSA), other agencies, or based on local need.
- (e) Providing an open and transparent Food Service with clear lines of communication for all service users.

1.2 Links to Corporate Objectives and Plans

The Food Service links to the Single Integrated Plan and the Improvement Plan for the Council. There are five key priorities contained in the Single Integrated Plan, these are:

1. Economic Prosperity
2. Health Improvement
3. Learning and Skills for Life
4. Living Sustainably
5. Safe and Supportive Communities

The Food Service Plan has direct links with the County Improvement Priorities and Improvement Plan. The Improvement Plan is framed around the well-being goals identified within the Well Being of Future Generations (Wales) Act 2015. This features within the Planning and Environment Business Plan, with targets being set around national ones. Each year, sub-priorities are chosen which will receive significant attention over a particular year and where we will make a bigger impact.

The Food Service sits within the Community and Business Protection Service of the Planning and Environment Portfolio. Each Service area within Community and Business Protection writes annual Operational Action Plans, which have been informed by a range of external and internal drivers and through a greater focus on robust risk assessment, intelligence led intervention, targeting and performance management. All team members contribute to devising the Operational Action Plans for each Service Area.

Food Law regulation is a statutory duty of the Council. Targets to be achieved are set in relation to both National Performance Accountability Measures and Service Improvement Data. A Corporate Performance Management System termed CAMMS, monitors performance of all services within the Council. The areas reported on are the Performance Accountability Measure, “the percentage of premises Broadly Compliant with Food Hygiene Legislation” and the following Service Improvement Data:

- (a) The percentage of High Risk Food Safety inspections carried out.
- (b) The percentage of High Risk Food Standards inspections carried out. This is reported in the

- (c) Trading Standards figure, as are (d) and (e).
- (c) The percentage of new businesses inspected for Food Safety.
- (d) The percentage of new businesses inspected for Food Standards.
- (e) The percentage of significant breaches resolved in relation to Food Standards.
- (f) The percentage of High Risk Feed inspections carried out.
- (g) The percentage of new businesses inspected for Feed.

The Food Service will continue to implement performance management systems to improve the efficiency and effectiveness of service delivery in a meaningful way to the citizens of Flintshire.

2.0 BACKGROUND

2.1 Authority Profile

Flintshire is a Unitary Authority. The County has an area of 43,464 hectares and a population of approximately 152,700 as per the 2011 Census. The County is made up of a mixture of small towns and conurbations, particularly to the south and predominately rural and agricultural land located in the north. The population is subjected to small seasonal fluctuations due to influx of tourists to the area. It has a number of industrial estates on which many manufacturers including food manufacturers are located, as well as headquarters for several food manufacturers including one large national food retailer. The coastal edge of Flintshire County Council abuts the Dee Estuary upon which cockle and mussel beds are situated. There is a small port located at Mostyn.

2.2 Organisational Structure

As previously state the Food Safety and Food Standards functions both fall under the responsibility of the Team Leader – Food Safety and Food Standards. Feed is managed by Team Leader - Trading Standards Compliance and Animal Health. Both team leaders report in to the Community and Business Protection Manager. The organisation structure of the Food Service is illustrated on the chart detailed in Appendix 1. Appendix 1 also includes the Management and Cabinet structure of the Council.

Specialist services are provided by Public Health Wales and Public Analyst Scientific Services as the Public Analyst and Agricultural Analyst. (See Section 3.5).

2.3 Scope of the Food Service

The scope of the respective component parts of the service are detailed below:

Food Safety

The Food Safety component of the service has the following responsibilities and service provision:

- Undertake a pre-planned programme of inspections of food premises within Flintshire.
- Enforcement of relevant food safety and food hygiene legislation in all food establishments in Flintshire.
- Registration of food businesses and approval of premises subject to compliance with product specific legislation (meat products, fish, shellfish, fishery products and dairy products).
- Implementation of the Food Hygiene Rating (Wales) Act 2013.
- Investigation of food complaints that relate to fitness of food for human consumption and investigation of all complaints which relate to hygiene matters (premises, practices, personnel) in food businesses.
- Investigation of sporadic cases of food and water related notifiable diseases and suspected cases of food poisoning.
- Investigation and control of outbreaks of food poisoning and food related notifiable diseases.
- Response to Food Alerts and food related incidents taking appropriate action as necessary.
- Advice to new and existing business, responses to plans, licensing and land charges referrals.
- Providing Export Health Certificates to allow movement of food from the UK to countries outside the EU.
- Act as Primary Authority for Iceland Food Retail Stores and act as Home and/or Originating Authority for other companies where necessary.
- Undertake food sampling in accordance with the Sampling Programme and in response to incident.
- Educational and promotional initiatives

Food Standards

The Food Standards component of the service has the following responsibilities and service provision:

- Undertake a pre-planned programme of inspections to food premises within Flintshire.
- Respond to requests for consumer advice in matters regarding food standards, labelling and composition.
- Investigation of complaints relating to the nature, quality or substance of food and complaints relating to mislabelling of food taking appropriate action as necessary.
- Provide advice, information and assistance to food businesses.
- Undertake food sampling in accordance with the Sampling Programme and in response to incidents.
- Undertake promotional and educational initiatives.
- Undertake duties and responsibilities as Primary Authority for Iceland Food Retail Stores and act as Home Authority and Originating Authority for other food businesses within Flintshire where necessary.

Feed

The Feed component of the service has the following responsibilities and service provision:

- Undertake a pre-planned programme of visits to feed premises within Flintshire.
- Undertake a pre-planned programme of targeted feed sampling and analysis (as determined by FSA Wales).
- Provide advice, information and support to feed businesses.
- Investigation of complaints relating to feedstuffs and sampling of feed as when required as part of complaint investigation.

The Service Delivery Point for the Food Safety, Food Standards and Feed Service is County Hall, Mold. For all of the above, the Service Delivery Points are open during normal office hours of 8.30 a.m. – 5.00 p.m. There is no official “out of hours” provision. However, there are systems in place to contact relevant staff should an emergency situation arise via the Care Connect Service.

2.4 Demands of the Food Service

There are 1286 food premises in Flintshire. Of the total number of food premises in Flintshire, 890 premises are caterers, with the remainder being made up predominantly by 324 retailers. The catering establishments cover a wide range of premises varying from restaurants, schools, hotels, pubs, residential care homes, hospitals to mobile food vehicles.

There are currently 47 food manufacturers and 27 distributors within Flintshire, 18 of which are approved under EU Regulation 853/2004 as they handle products of animal origin. These regulations place additional control measures on these types of premises and on the Local Authority.

The types of food manufacturers within Flintshire vary greatly in the types of processes they use to produce food. These range from cooked meat and ready meal manufacturers with national distribution, through to an on-farm milk pasteuriser supplying milk locally. The diversity in the types of manufacturers operating within the County places a significant demand on the breadth and depth of knowledge required by officers within the Team.

Dee Estuary

The Dee Estuary has two cockle beds falling within Flintshire's jurisdiction. There is also one mussel bed. Two previously fished cockle beds and one mussel bed are remain unclassified for shellfish harvesting due to very low stock levels.

The shellfish beds can place significant demands on the Team, particularly during the six month cockle opening season. The management of the Dee accounts for a large portion of the Sampling Budget due to the statutory sampling of the water and shellfish.

Enforcement on the Dee involves a cross-agency partnership working with National Resources Wales, Wirral Council, the Centre for Environment, Fisheries and Aquaculture Science (CEFAS), other neighbouring Local Authorities, the North Western Inshore Fisheries and Conservation Authorities and the Food Standards Agency Wales.

Port Health

There is a small port at Mostyn for which the Food Team has responsibility in relation to the ships coming into port requiring a Ship Sanitation Certificate or a food hygiene inspection.

Food Hygiene Rating (Wales) Act 2013

The Council implemented the National Food Hygiene Rating Scheme in December 2010. Since 28th November 2013, the Food Hygiene Rating (Wales) Act 2013 came in to force. The administration of this Act accounts for a considerable volume of work for the Team. As of 28th November 2014, the Act also applied to businesses that operate trade to trade.

There have been further changes to the legislation in November 2016, with the introduction of the Food Hygiene Rating (Promotion of Food Hygiene Rating) (Wales) Regulations 2016, which require takeaway food premises to provide a specific bi-lingual phrase on all their promotional literature which contains a price of the food and a method of ordering it remotely.

Premises Profile

The premises profile, as defined in the Food Law Code of Practice (Wales) April 2014, is detailed in Table 1:

Table 1: Breakdown of premises profile by risk band for Food Safety and Food Standards.

FOOD STANDARDS			FOOD SAFETY			
Risk	Min.	No. of		Risk	Min.	No. of
High	12 months	13	High	A	6 months	3
				B	12 months	22
Medium	2 years	409		C	18 months	465
Low	5 years	814	Low	D	2 years	251
				E	3 years	504
OUTSIDE		15		OUTSIDE		18
UNRATED		35		UNRATED		23
TOTAL		1286		TOTAL		1286

Please note: there are 5 bands of risk for Food Safety, with A to C being deemed to be High Risk and only 3 bands of risk in Food Standards, with only A being deemed High Risk.

Feed

Under the EU Feed Hygiene Regulation (1831/2003) feed activities are clearly defined and are broken down into 'Approved' and 'Registered' feed activities. Activities requiring Approval include any activity involving the manufacture and/or placing on the market of feed additives including zootechnical products (the technology of animal husbandry), with all such activities being classed as high risk. There are currently no businesses in Flintshire that have an Approval under the Regulation. 'Registered' feed activities are all other feed activities that are undertaken of which there are 14 registerable feed activities defined and coded by the FSA these are termed as 'R Codes' and run consecutively from R01 (the highest risk activity) through to R14 (the lowest risk activity).

In Flintshire there are currently a total of 420 registered feed premises which are registerable across a wide range of feed activities. These activities are made up as follows: 342 are registered as farms (Livestock or arable), 9 as feed manufacturing and packing businesses, 35 as on farm feed mixers, and 25 businesses registered for the supply of surplus food or co-products of manufacture. The remainder of the registered premises are engaged in storage, transportation and distribution of feed, 1 and 8 respectively.

The diversity in the types of Feed Businesses operating and activities being undertaken within the County places a significant demand on the breadth and depth of knowledge required by officers within the Team.

Following a review by Food Standards Agency Wales in 2014 of the delivery of Animal Feeding Stuffs Enforcement across Wales, with effect from 1st April 2015 the system for risk assessing feed activities was simplified with all registerable feed activities across Wales being broken down into one of two categories based on risk. These two categories are referred to as '*Above the Line*' (or High Risk) and '*Below the Line*' (or Low Risk).

Above the line activities are the high risk activities and those premises include all businesses undertaking any 'Approved' feed activity and those engaged in

'Registered' feed activities involving production, processing, storage, transportation, sale of feed, or supply of food co-products, or surplus foods for use in animal feed and ultimately human consumption of those animals as part of the human food chain. These activities require a 'qualified' and 'competent' officer to inspect them.

Below the line activities are the low risk activities that include premises that are feeding animal feed stuffs to livestock or growing straight feed crops that are to be consumed in their natural state such as silage. This applies to all of Flintshire's farms. These activities have a lower requirement for officers to be able to perform these activities, only requiring that an officer be 'competent' to complete this work.

The frequency of inspection of feed premises has since 1st April 2015 been determined by FSA Wales with the launch of the FSA Wales sponsored North Wales Feed Enforcement Delivery Plan. The plan for 2016/17 required Flintshire to inspect premises across the county for a total of 76 registered feed activities, 54 of these were above the line with the remaining 22 being below the line.

The figures for 2017/18 are 37 above the line inspections (High Risk), and 80 below the line (Low Risk) inspections giving a total of 117 for the year. The breakdown of the Feed premises profile is detailed below by risk band:

Table 2: Breakdown of the premises profile by risk band for Feed.

FEEDINGSTUFFS		
Risk	Frequency of Inspection	No. of registered activities subject to inspection
High	Every 3 years (as per Feed Code of Practice) However, currently inspections are being determined by FSA as part of Regional Delivery Plan. Inspections due for 2017/18 = 37 High Risk.	78
Low/Medium	Every 14 years (as per Feed Code of Practice) However, currently inspections are being determined by FSA as part of Regional Delivery Plan. Inspections due for 2017/18 = 80 Low Risk.	342
TOTAL inspectable registered activities		420

<p>2.5 Enforcement Policy</p>	<p>The vast majority of food business owners are English speaking with a minor requirement for written reports in Welsh. All advisory literature is produced bilingually in accordance with the Welsh Language Standards of the Council which came in to force on 30 March 2016. Approximately 14% of residents in Flintshire are recorded as Welsh speaking.</p> <p>Approximately 4% of food businesses are of ethnic origin (Asian, Chinese, Turkish and Greek) and once again advisory literature is available in a range of ethnic languages to assist in understanding.</p> <p>The Food Service undertakes enforcement in accordance with the Public Protection Enforcement Policy which has been updated and approved by Members in 2010. This policy has been based upon the principles of the Enforcement Concordat adopted by Members in September 2000 and the Regulators Compliance Code.</p> <p>There is also an Enforcement Policy for residents entitled “Regulation and Enforcement – Involving Local Residents”, which was approved by Council in September 2011.</p>
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3.0 SERVICE DELIVERY

<p>3.1. Food Premises Inspections</p>	<p>The Service has one Performance Accountability Measure detailed in the Local Government Performance Improvement Framework 2017-18 and a number of Service Improvement Data relating to all 3 areas of the Service for 2017/18 which are detailed in 1.2.</p> <p>The Food Service will carry out inspections in relation to the Performance Indicator, in accordance with pre-planned programmes drawn up annually and commencing on 1st April each year, to coincide with the reporting requirements for the Service to the Food Standards Agency Wales, as part of the Local Authority Enforcement Monitoring System (LAEMS). These inspection programmes are based on the risk rating of the premises/trader so that there is a targeting of resources.</p> <p><u>Food Safety and Food Standards</u></p> <p>The performance of the Food Safety and Food Standards Team in 2016/2017 was excellent with the Team achieving 100% of High Risk inspections for both</p>
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Food Safety and Food Standards.

The target of 87% of new businesses to be inspected for Food Hygiene was exceeded with 90.4% actually being achieved. The Food Standards New Business target of 75%, which is part of the overall Trading Standards target, was also exceeded by achieving 89.9%. This was enabled by the majority of new business inspections being undertaken by the officers who are authorised to carry out both Food Standards and Food Safety inspections thereby facilitating the inspections being completed by one visit. This also ties in with the Reducing the Burden on Business agenda by combining the two types of inspection.

There is a Public Accountability Measure in place, namely the percentage of businesses which are Broadly Compliant with Food Hygiene legislation. For 2016-17, this figure has improved slightly from 96.4 to 96.5% of food businesses within Flintshire falling into this category.

For D and E risk band Food Hygiene inspections (i.e. the lower risk premises), a figure of 100% of inspections was achieved. For the E risk band premises, this was by way of a physical inspection in most cases with only a few businesses being subject to an alternative enforcement questionnaire as permitted by the Food Law Code of Practice (Wales) 2014.

For Food Standards, the work that has been achieved is excellent such that the majority of businesses that have previously not been visited by the team, have now received an inspection.

All low risk premises have received a physical inspection or an alternative enforcement questionnaire has been completed to assess risk of activity with the exception of nine businesses that did not respond by the end of March 2017. These businesses have subsequently been prioritised for inspection the first quarter of 2017-18.

A full breakdown of performance for 2016-17 is provided in Appendix 3.

The key objectives for the coming year in relation to programmed inspection and enforcement work are as follows:

Food Safety

- Inspect 100% of all food businesses due a food hygiene inspection in 2017-18.
- Undertake a physical inspection all E risk band premises for Food Hygiene that fall within the scope of the Food Hygiene Rating (Wales) Act 2013 but have not had a physical inspection since the introduction of the legislation. Approximately 50 businesses which fall in to this category are not technically due their Food Hygiene programmed inspection this year. However, they are going to be inspected by March 2018 so that all businesses within Flintshire that fall within the scope of the legislation will have a food hygiene rating which they must display.
- To revisit all premises receiving a Food Hygiene Rating of 2 or lower to assess compliance, in line with the All Wales Revisit Policy written by the All Wales Food Safety Expert Group. Please note – this type of revisit does not result in a new food hygiene rating.
- To inspect all Flintshire school canteens as part of this service being moved over to Newydd Catering and Cleaning Ltd.
- To inspect all Flintshire afterschool clubs that fall in to the scope of activity as being a food business.

Food Standards

- Inspect 100% of all food premises due a Food Standards inspection in 2017-18.
- To revisit all premises with Significant Breaches or non-compliance with Allergen Information requirements.
- To inspect all Flintshire school canteens, as above
- To inspect all Flintshire afterschool club, as above

A full breakdown of premises programmed for inspection 2017-2018 in relation to their risk band is given in Appendix 2. For Food Hygiene this gives a total of 605 inspections due and for Food Standards a total of 310 inspections due. These figures are those premises that are due inspection this financial year. However, the team are also undertaking additional inspection work in premises that fall within scope of the Food Hygiene Rating (Wales) Act 2013 and Flintshire schools, which is detailed above. This equates to a further 90 inspections

for Food Hygiene and Standards.

Last year, the number of Food Hygiene enforcement revisits was 52. It is anticipated, the figure for this year will be similar. For Food Standards, it is anticipated the enforcement revisit figure will increase as the Revisit policy has been strengthened to include premises with Allergen Information non-compliance.

Feed

Following a major review of feed service delivery across Wales conducted by FSA Wales in 2014 all feed work across Wales since 01st April 2015 has been delivered as part of collaborative working based on regional delivery plans. These plans have been developed in conjunction with FSA Wales and are based on priorities set by FSA Wales.

Currently the FSA are specifying the level of inspection each year as part of their plan. This has seen during 2016/17 a premises inspection target of 78 high and low/medium risk premises inspections being set by FSA for Flintshire. This target was met in full. The target set for 2017/18 by FSA is for 37 High Risk inspections and 80 Medium/Low Risk inspections.

3.1.1 Additional Targeted Inspection/ Enforcement Activity

Additional targeted inspection and enforcement activity due to be undertaken is as follows:

- Effective and professional liaison, communication and co-operation with Iceland Frozen Foods, other LA's and Regulatory Delivery relating to Primary Authority (PA) matters.
- Investigation of notified food safety related fraud incidents, such as illegal slaughter of meat, including referrals made anonymously.
- Issue of Sanitary Certificates as appropriate for incoming vessels to the Port of Mostyn.
- Appropriate response and liaison with other agencies as necessary for Civil Contingency matters.
- Assessing non-compliance with the Food Hygiene Rating (Wales) Act 2013 and associated regulations in regard to mandatory display of food hygiene ratings stickers and the inclusion of the mandatory bi-lingual statement on promotional literature for takeaways.

3.1.2 Resources for Inspections and Additional Enforcement Activity

Food Safety and Food Standards

The programmed food hygiene inspections will be undertaken by Environmental Health Officers (EHO) and Food Safety Officers (FSO). A full breakdown of resources is given in 4.2 – Staffing Allocation. Food Standards work will be carried by our Trading Standards Officer, EHOs and FSOs who have completed their Food Standards module.

The remaining officer who was not Food Standards competent, is undertaking the Higher Certificate in Food Standards so that all team members will be able to undertake Food Standards inspections from around quarter three onwards.

Other areas of Trading Standards work within food premises such as Weights and Measures will be carried out by the Trading Standards Officer within the Food Team. This places an absolute requirement for a fully competent Trading Standards Officer to be within the Team.

Feed

All aspects of feed work will be carried out by 0.2 FTE fully qualified Trading Standards Officer and 0.2 FTE Trading Standards Enforcement Officer. This work is to be distributed across 5 officers who are qualified and/or competent in accordance with FSA/Code of Practice requirements who are all based in the Trading Standards Compliance and Animal Health Team.

3.2 Food/Feed Complaints

Food complaints cover the full range relating to fitness for human consumption, presence of extraneous matter in foods, microbial contamination and Food Standards issues such as food labelling, chemical adulteration and spoilage of food.

It is the policy of the Food Service to investigate all food complaints reported including those made anonymously.

Food Safety and Food Standards

All food complaints are dealt with in accordance with the Food Law Code of Practice (Wales) April 2014, having regard to the documented Public Protection Enforcement Policy 2010.

Based on statistics for previous years, the estimated number of Food Safety and Food Standards complaints is between 100 and 120 excluding Primary Authority referrals.

Please note the above figures do not indicate dealing with food complaints referred by other Local Authorities when acting as Home, Originating or Primary Authority.

Feed

All feed complaints will be dealt with in accordance with the Feed Law Code of Practice (Wales) 2014, having regard to the documented Public Protection Enforcement Policy 2010.

The number of feed related complaints received by the service is low, typically no more than 3 a year. This is because the majority of transactions involving the buying and selling of feed are business to business contracts that are based on written specifications agreed as part of contracts between manufacturer/seller and the buyer.

Buyers and producers/sellers of animal feed for the agriculture industry work very closely together, feed formulations are often made on a bespoke nature to include ingredients for a specific purpose for use by specific animals or groups of animals. Adverse effects of feed on livestock are often due to how the feed has been used rather than how it has been made, examples investigated by officers include the wrong type of feed being given to the wrong type of animal (poisoning), over feeding, and incorrect or unsafe storage (inadvertent cross contamination) by the purchaser.

Complaints received when investigated are generally down to the user rather than the producer and the effects are therefore limited to one premises or business. This makes this area quite a complex one to deal with, where a heavy reliance on the honesty of the buyer to be open with officers with regard to their own acts or omissions that may have caused illness or injury to their livestock is important, although where this is not the case this can normally be detected on investigation including where necessary complaint sampling and analysis of feed products where sufficient suitable feed is found present to enable accurate and representative sampling and

analysis of the product.

Complaints are largely dealt with between the industries themselves (feed producers and livestock producers) and the intervention of Trading Standards Officers is treated as a last resort to act as arbiters where the usual protocols have failed.

3.3 Primary Authority Principle

Food Safety and Food Standards

Flintshire County Council subscribes to both the Primary and the Home Authority Principle. The Food Service acts as both Home Authority and/or Originating Authority for approximately 50 food businesses and has entered into a Primary Authority relationship with Iceland Foods Ltd, the National Supermarket chain based in Deeside.

The maintenance of the Primary Authority relationship with Iceland Foods Ltd places a pressure on maintaining a level of expertise in Food Safety, Food Standards, Labelling and Composition.

Flintshire is also committed to improving relationships with business and will continue to develop relationships with business by further promotion of Primary Authority, where applicable, and effective business engagement at all times.

Feed

There is currently no formal Primary Authority relationship between FCC and any Flintshire based Feed Business Operator. Iceland Stores have recently engaged in a pilot trial scheme working directly with the FSA. This has involved the company registering all of its UK stores for the supply of surplus food (morning goods) for use in the animal feed chain and ultimately the human food chain.

There has been no formal PA relationship entered in to between FCC and Iceland due to the significant demands that this would place on FCC officer resource, that we are unable to meet, that have been explained to and accepted by FSA. FCC officer workload has increased significantly since Iceland registered all of their UK shops earlier this year, due to requests for information being received from other UK local authorities for information on Iceland's systems and Inspection Plans.

3.4 Advice to Business

The policy of the Food Service is to provide a balanced approach between the provision of advice and enforcement activity. The Service is committed to providing an effective and responsive advice and assistance service, both during inspections or upon request, for all Flintshire businesses, including a service in accordance with the Regulatory Delivery Primary Authority Principle and the Local Government Regulation (previously LACORS) Home Authority Principle.

In addition, the Service provides advisory literature, (either produced nationally or in-house) free of charge to businesses to assist them with compliance with relevant legislation. Training courses/seminars will be run subject to demand, for which there is usually a fee, to also assist businesses in compliance.

Food Safety and Food Standards

In order to maximise the use of limited resources, advice is targeted as follows:

- During inspections and as part of follow up documentation.
- Start-up advice on request.
- Through guidance information available on the Food Safety Teams fully revised website pages.
- Distribution of relevant food safety and food standards material to food businesses.
- Advice and information is given to businesses requesting guidance either by telephone, email or post.

Based on last year's trends, the estimated number of requests for advice, including those proposing to start up a food business for the forthcoming year, is anticipated to be approximately 160 in relation to Food Safety and Standards. Advice to businesses is provided by all members of the Team.

Feed

Flintshire is committed to supporting feed businesses and working with them to enable compliance with all regulatory and best practice standards, and to protect animal health and welfare, and the human food chain. In order to maximise the use of limited resources, advice is targeted as follows:

3.5 Food Inspection and Sampling

- During inspections and as part of follow up documentation.
- Start-up advice on request to New Business.
- Through sign posting to guidance information available on the Trading Standards Wales and FSA Wales websites.
- Distribution of relevant feed hygiene and standards material to feed businesses.
- Advice and information is normally given to businesses requesting guidance either by telephone, e-mail or post, or where appropriate through a visit to the business operator by an officer

The launch of the North Wales Feed Service Delivery Plan in April 2015 that has now entered its third year has led to an increased demand for business advice and support.

Food Safety and Food Standards

Sampling will be carried out in accordance with the documented Sampling Policy for the Food Service which was referred for Member Approval in July 2001. The sampling programme is devised so that the procurement of samples will follow a risk based approach. The programme will takes in to account statutory requirements as well as the requirements of the Food Standards Agency, the Welsh Food Microbiological Forum and local need.

Samples taken for Food Standards issues are submitted for analysis by the formally appointed and NAMAS accredited Public Analyst for the Council (and Agricultural Analyst for Animal Feed purposes):

Public Analyst Scientific Services
Valiant Way
Wolverhampton
WV9 5GB

Samples taken as part of the Sampling Programme for Food Safety issues are submitted for microbiological examination by the designated and NAMAS accredited laboratory of:

Public Health Wales
Ysbyty Gwynedd

Penrhosgarnedd
Bangor

Each Local Authority is allocated sampling accreditation by the Public Health Wales.

The Food Sampling Programme does not preclude the need to undertake reactive sampling i.e. as a result of a food complaint or during food poisoning investigations. Sampling undertaken as part of an Infectious Disease Notification or Outbreak are sent to the laboratory at Ysbyty Gwynedd, Penrhosgarnedd, Bangor.

The Service took part in several successful bids for funding for Food Standards sampling from FSA Wales in 2016-2017. These were undertaken in collaboration with the North Wales Region. The regional grant amounted to £22,962.50 in total across the region, of which approximately one sixth was awarded to Flintshire Food Safety and Standards Team. The Team were also awarded approximately one sixth of £2,219 for taking part in Opson VI, which focussed on Food Supplements for 2016-17.

The Team Leader Food Safety and Food Standards is Chair of the Welsh Food Microbiological Forum (WFMF) which is responsible for devising Food Safety Sampling Surveys across Wales, based on risk assessment and intelligence to better target resources at particular foods or food poisoning organisms of concern within the UK.

All samples are submitted using the UK-Food Surveillance System (UK-FSS) to better target resources in respect of the Food Sampling for Food Standards and by using the latest Internet-based version of the database. This will continue to be used for Food Safety and Food Standards sample submission during 2017-18.

Sampling Projects undertaken during 2016-2017 included:

- Colours in sauces from takeaways
- Allergens in loose foods
- Alcohol Authenticity
- Meat Species Substitution
- Opson VI Operation on Food Supplements

Samples were also taken as part of programmed inspections at manufacturers and premises where

product specific legislation applies. The budget for sampling will remain the same as it was in 2016-17.

Sampling Projects for 2017-18 are:

- Allergen Management (as part of the North Wales Regional Collaboration project)
- Alcohol Authenticity
- Meat Speciation
- Food Supplements

The anticipated number of samples for Food Standards is around 100 including samples taken for labelling checks. The level of grant available from FSA Wales is much reduced this year as the funding stands at £20,000 for the whole of Wales. Therefore the types of samples taken will change such that labelling checks and alcohol dip stick testing will be undertaken with fewer samples being sent to the Public Analyst.

Samples will be taken as part of programmed inspections at manufacturers, approved premises and premises where product specific legislation applies.

For Food Safety, there will be statutory sampling at approved premises and taking part in WFMF surveys to include:

- Microbiological Examination of diced and sliced cooked chicken – Quarter 1 and 2
- Microbiological Examination of Shopping Basket items – Quarter 1 and 2
- Microbiological Examination of school meals - Quarter 3 and 4

Feed

Sampling of Feeding stuffs during 2017/18 will be undertaken as part of the FSA funded North Wales Feed Service Delivery Plan (part of the North Wales Trading Standards Collaboration). Details have not yet been supplied by FSA of what sampling project work will be required during 2017/18. However, once details are known FCC will participate in any FSA Wales funded sampling projects that are planned during the year. Other than sampling directly funded by FSA Wales Flintshire will not be in a position to take any feed samples other than in response to complaints received or feed safety incidents.

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

Feed sampling undertaken during 2016/17 included:

- Sampling and analysis of Silage for presence of Heavy Metal Residues.
- Sampling and analysis of Maize for presence of Mycotoxins.
- Sampling and analysis of Poultry Layers Pellets for presence of Salmonella.

With all products found to be sound and wholesome in constitution and to be within permitted limits or free of the contaminants sampled for.

Investigation and control of outbreaks of food related infectious disease will be carried out in accordance with the Communicable Disease Outbreak Plan for Wales, which was approved by Members in 2011. It has been developed from the amalgamation of several Plans relating to water borne incidents, food poisoning and communicable disease outbreaks.

Investigations of sporadic notifications of food related infections disease shall follow the existing documented procedure within the Section. Based on previous years' trends, it is estimated that there will be approximately between 200 and 230 cases of sporadic notifications and between 0 and 10 outbreaks.

Campylobacter was the highest incidence of food-borne illness for 2016-2017 in Flintshire, which follows a National trend. The reduction of the incidence of *Campylobacter* is identified as a priority within the Food Standard Agency's Strategy 2015-2020.

Outbreaks are characteristically resource intensive but do not follow an annual trend, therefore the anticipated burden on staffing cannot be predicted. However, should they occur the impact on resources cannot be over-estimated and would require rapid contingency planning for maintaining the delivery of the rest of the Service. They also involve close liaison and cross-agency working between Public Health Wales and other Local Authorities.

3.7 Food/Feed Safety Incidents

Food Safety and Food Standards

Food Alerts will be initiated and responded to in accordance the Food Law Code of Practice (Wales) April 2014.

Responses to Food Alerts will be kept in a centralised documented format and the contact details for the Team and relevant Agencies (including out of hour's contacts) will be kept up to date. It is difficult to quantify the resource implication of this function as it depends upon the category of Food Alert and the extent of food or businesses affected within Flintshire.

There were several incidents within 2016-17 which required considerable investigation work and enforcement action by the Team. These ranged from serious foreign body and microbiological contamination of food, mislabelling and undeclared allergen through to food supplements containing 'novel foods'.

Feed

Alerts will be initiated and responded to in accordance with the Feed Law Code of Practice (Wales) 2014.

Responses to Feed Alerts will be kept in a centralised documented format and the contact details for the Team and relevant Agencies (including out of hour's contacts) will be kept up to date. It is difficult to quantify the resource implication of this function as it depends upon the nature of the Feed Alert and the source of supply, type, and quantity of feed product involved as well as the distribution of the feed, local regional, national, international.

3.8 Liaison with Other Organisations

The Food Service as a whole is committed to ensuring effective liaison with other relevant organisations to enforce consistency of approach. This includes liaison with:

- Food Standards Agency Wales (FSA Wales).
- Regulatory Delivery
- Professional bodies such as the Chartered Institute of Environmental Health and Chartered Trading Standards Institute.
- Public Health Wales, National Resources Wales, CEFAS, Animal and Plant Health Agency and other relevant advisory/liaison bodies.

- Other Local Authorities in Wales as a whole. Additionally, representatives from the Team attend and actively participate on the All Wales Food Safety Expert Group and the All Wales Communicable Disease Expert Panel. These Panels act as a means of optimizing regional and countrywide consistency in enforcement and guidance given.
- Neighbouring LA's. The Team Leader sits on the North Wales Regional Food and Communicable Disease Task Group. There is also close liaison with the North Wales Trading Standards Collaboration Project.
- Liaison with other relevant local bodies, e.g. Magistrates Courts, the Licensing Committee as well as liaison with local fishermen by way of the North Wales and Deeside Shellfish Liaison Group.
- Liaison with other Departments within Flintshire County Council, such as the Planning Department. A system of formal consultation with relevant sections of the Community & Business Protection Service has been set up, so that prompt, appropriate advice may be given to ensure compliance with relevant legislation.

In addition to all of the above, liaison is also maintained between members of the Food Team by monthly Team Meetings. There is also a weekly management meeting for Team Leaders and the Service Manager within Community and Business Protection.

The Feed element of the service is committed to ensuring effective liaison with partners and other relevant organisations to ensure and enforce consistency of approach. This includes liaison with:

- Food Standards Agency Wales (FSA Wales)
- Veterinary Medicines Directorate (VMD)
- Animal and Plant Health Agency (APHA)
- Professional bodies such as the Chartered Trading Standards Institute (CTSI), National Trading Standards (NTS) and the Association of Chief Trading Standards Officers (ACTSO).
- Other Local Authorities across Wales and the UK
- Partner Local Authorities in the North Wales Feed Enforcement Delivery Plan (Wrexham, Denbighshire, Gwynedd, Ynys-Mon, and Conwy).
- Liaison with regional and national panels and expert interest groups including the joint

WHoTS/FSA Feed Working Group, WHoTS and UK Animal Health and Welfare Panels etc.

In addition to the above, liaison is maintained within the Feed element of the Trading Standards Compliance and Animal Health Team through monthly team meetings, and 1:1's. There is also a weekly management meeting for Team Leaders and the Service Manager within Community and Business Protection.

3.9 Food Safety/ Food Standards and Feed Promotion

Educational and promotional activities are important components of a comprehensive Food Service.

Food Safety and Food Standards

Last year, these were achieved in the following ways:

We delivered 2 presentations on updates in Food Safety legislation and guidance and on Allergen Information Compliance at the Food and Hospitality Conference held at Coleg Cambria in September 2016. This was a full day event and was attended and very well received by approximately 200 food businesses from across the North Wales region.

We sent out advice to takeaways on new legislative requirements brought in by the Food Hygiene Rating (Promotion of Ratings) (Wales) Regulations 2016. We also added advice to all our programmed inspections to provide in situ advice to businesses in the lead up to and after introduction of the legislation. This was grant funded by Welsh Government to a capped amount of £2431.00.

We took part in Operation Opson VI during January 2017, which focused on Food Supplements. This is an international operation which is ran annually. Interpol and Europol take the lead for this and its purpose is to target counterfeit and substandard foodstuffs worldwide. For this year's operation, Food Supplements was chosen in Wales as this is a priority area for the Food Standards Agency and has been an issue across Europe due to the use of unsafe substances such as DNP, the adulteration of food supplements or the mislabelling of products such as making unsubstantiated health claims. We contacted all gyms, tanning salons, beauty spas and similar types of premises with a letter and advisory leaflet which had been provided by the FSA, advising them of their legal duties and to advise how such products should be sourced and labelled. This was followed up by sampling

at several premises.

We completed survey work in relation to the display of food hygiene ratings in premises with a rating of 0, 1 and 2. All businesses within this category were written to and a hygiene rating sticker sent to them before any sticker checks were carried out. From this, the majority of premises visited were displaying the correct valid food hygiene rating sticker at the time the officer entered the premises. No Fixed Penalty Notices had to be issued as a result of this survey.

Promotional work programmed for this year includes:

- This year's Food Safety Week theme is Safe Summer Eating and is being launched on 19th June 2017 to coincide with National Picnic Week. The promotional activity is to be ran throughout the year on 3 key themes of Safe Summer Eating, Christmas (Sept - Dec) and Spring Clean (Jan – March).
- Allergen Management North Wales Region Collaboration Project. The project is being overseen by Gwynedd County Council and will involve all six North Wales authorities. The funding is being sought from FSA Wales by way of grant funding. The application is due to be submitted by July 2017.
- Two members of the team are carrying out talks on Food Hygiene ratings and Allergens at the Women's Institute in June 2017.

Feed

Officers of the service work with the trade offering advice and guidance on compliance with legal and best practice standards during routine inspection work conducted on farms, in shops, and in factories on behalf of FSA Wales and during our work at Critical Control Points (CCP's) including Mold livestock auction when carrying out routine animal health and welfare and disease control work. Promotion work is done as part of routine inspection or in response to enquiries made by business to the service.

4.0 RESOURCES

4.1 Financial Allocation

The financial allocation for the Food Service is split between budgets provided for the Animal Health and budgets provided for the Food Safety and Food Standards Service. The overall level of expenditure providing the Food Safety and Food Standards Service for 2017-18 is detailed below in Table 3.

Table 3: Budget for the Food Safety and Food Standards Team

COST ITEM	FINANCIAL ALLOCATION
(a) Staffing (total staff costs)	£509,356
(b) Travel (lump sum and mileage) and Subsistence	£5,546
(c) Equipment (including investment in I.T. *)	£2,981
(d) Sampling	£3,677
(e) Shellfish Sampling	£9001
(f) Support Costs for Printing and Translation	£398
(g) Training	Centrally held budget which is accessed via application for funding of training

The allocation for Food Sampling work covers both Food Safety and Food Standards. This is in addition to the allocation provided by Public Health Wales. Additional funding can and will be made available should there be an incident which requires it.

Table 4 shows the overall level of expenditure for Feed Service delivery:

Table 4: Budget for the Feed Service Delivery 2017/18

COST ITEM	FINANCIAL ALLOCATION
(a) Staffing (total staff costs)	£12994.80
(b) Travel (lump sum and mileage) and Subsistence	£2000.00
(c) Equipment (including investment in I.T.*)	£500.00
(d) Sampling	No current budget but funding may be available from FSA Wales later in 2017/18 for targeted project work.
(e) Training	Centrally held budget which is accessed via application for funding of training
(f) Total	£15494.80

* There are no separate costs for I.T. as I.T. requirements are provided centrally by Central Support I.T. Services. The exception to this is for the cost of RSA Tags for Mobile and Agile Working which are borne by the Food Safety and Food Standards Budget and the Trading Standards Compliance and Animal Health Budget.

4.2 Staffing Allocation

Food Safety and Food Standards

The Food Safety and Food Standards team is made up of the Team Leader – Food Safety and Food Standards 1.0 FTE, 5.5 FTE EHOs, 3.0 FTE Food Safety Officers and 1.0 FTE Trading Standards Officer. All members of the team are permanent positions.

Administrative support is currently provided by 1.0 FTE Administration Officer, pending the Corporate-wide Admin Review. This administration role is managed by the Directorate Support Manager.

In accordance with the Food Law Code of Practice (Wales) April 2014, all Environmental Health Officers in post are qualified Environmental Health Officers, registered with the Environmental Health Registration Board (E.H.R.B.). Food Safety Officers are qualified to the Higher Certificate in Food Premises Inspection and all officers are qualified in HACCP Principles (Hazard Analysis Critical Control Points). Two of the Food Safety

Officers also hold the Higher Certificate in Food Control.

All staff are authorised appropriately for the duties they perform. All EHOs meet the post two year qualified competency requirement to use all enforcement powers required by the Code of Practice. In addition to the above, the Team Leader for Food Safety and Food Standards is also a qualified Lead Assessor having successfully completed the five-day Lead Auditor Training Course.

The Trading Standards Officer holds the Diploma in Trading Standards and has also successfully completed the five day QMS Auditor/Lead Auditor training course.

The full breakdown of resources required to deliver the Food Safety and Food Standards service is given below:

Table 5: Full Breakdown of Resources by Full Time Equivalent (FTE) to Deliver the Food Safety and Food Standards Service

Intervention Type	Food Safety FTE	Food Standards FTE
Inspections	5.0	2.5
Revisits	0.3	
Complaints	0.4	
Primary Authority	0.1	
Food Incidents	0.2	
Food Business advice/promotion and other Non-Official Controls Interventions	0.4	
Communicable Disease	0.5	N/A
Sampling	0.1	0.1

Please note – this breakdown of resources includes the 0.2 FTE operational aspect of the Team Leader. The remainder of the Team Leader 0.8 FTE is not taken account of above as this includes the operational management functions of this role including Corporate matters which are not easily broken down in to the headings provided. A further 0.1 FTE of the Trading Standards Officer role is spent regulating other Trading Standards legislation in food businesses such as Weights and Measures legislation.

We are able to fulfil the inspection resource requirement by completing the majority of inspections as joint inspections i.e. the officer does both a Food Safety and Food Standards audit during the same visit. This flexibility is key to ensuring we can deliver the service level expected based on current resources.

Feed

All aspects of Feed work will be carried out by six officers of the service as part of their duties as members of the Trading Standards Compliance and Animal Health Team. These are 0.1 FTE Team Leader Trading Standards Compliance and Animal Health, 0.1FTE Trading Standards Officer, and and 0.2 FTE Trading Standards Enforcement Officer.

The Team Leader and the teams Trading Standards Officer are currently the only two officers within the team that satisfy all criteria as a 'qualified' and 'competent' feed officer, this includes holding the Diploma in Trading Standards (or equivalent), successful completion of the five day QMS Auditor/Lead Auditor Training Course, completion of CIEH accredited HACCP training, and participation in an FSA programme of feed training in conjunction with their approved training provider. Such qualification means that these two officers are suitably qualified and competent to undertake all aspects of feed work, while the Trading Standards Enforcement Officers satisfy the 'competency' criteria based on experience and training that enables them to perform Below the Line (Low Risk) feed work on both Livestock and Arable Farms. All six officers satisfy the FSA requirements re qualification and /or competency to enable them to undertake feed enforcement work. This includes meeting the requirement to undertake a minimum of 10 hours relevant CPD annually.

4.3 Staff Development Plan

During the forthcoming year the following training is planned:

- (i) Support of national and regional seminars on relevant subject matters.
- (ii) In-house training sessions on relevant subject matters.

Each individual's training requirements are going to be set out in the Planning and Environment Learning and

Development Plan 2017-2018.

Each member of the Team will receive the required ten hours Continuing Professional Development as required by the Food Law Code of Practice (Wales) April 2014.

Staff will be subject to annual individual Staff Appraisals in line with the Corporate H.R. Policy with a mid-year review which identifies and tracks training and development needs. All staff also have monthly One to Ones with the Team Leader to identify and monitor areas requiring development.

Some of the training courses attended by staff during 2016-17 include:

- All Wales Food Hygiene Rating Consistency
- Food Standards Improvement Notices Enforcement
- Food Standards for Food Safety Officers
- Enforcement Sanctions
- Law, Evidence gathering, Best Practice
- Internal Food Hygiene and Food Standards update

Attendance at the Lead Officer for Communicable Disease Training included a test of the All Wales Communicable Disease Outbreak Plan.

Training planned for 2017-18 includes:

- All Wales Consistency on Food Hygiene Ratings
- Regulatory Investigatory Powers Act
- Food Standards – Higher Certificate
- Food Standards for Food Safety Officers
- HACCP Refresher
- Communicable Disease legislation refresher

A full list of training required has been submitted to the All Wales Food Technical Panel as they provide the FSA with guidance on training programmes to be delivered on an All Wales basis. Team members attend this training as per the allocation given to each local authority.

Feed

The two qualified and competent Trading Standards Officers of the team along with two of the four Trading Standards Enforcement Officers have all attended

specialist training on Feedstuffs during the period 2016-2017, to ensure continued competence and qualification and will continue to undertake ongoing training as part of CPD for feed during 2017/18. They will be joined by two additional officers to complete both course based and on the job training to improve competence and knowledge during 2017/18 including on-going CPD.

All feed training is provided regionally as part of the North Wales Regional Feed Enforcement Delivery Plan that is funded by FSA.

5.0 QUALITY ASSESSMENT

5.1 Quality Assessment Food Safety and Food Standards

Within the Food Service, quality systems are in place to ensure that work is completed and checked by a competent person in line with the fully documented Quality Monitoring Procedures. Documented procedures and work instructions exist to ensure consistency of approach with various computer report mechanisms to check accuracy on the APP Database. Work Instruction is provided on key areas of work retained within Formal Procedure Manuals.

The Team Leader attends the North Wales Food and Communicable Disease Technical Panel, the All Wales Food Safety Expert Group and the All Wales Communicable Disease Expert Group. These forums offer the opportunity to discuss in detail a wide range of quality and consistency issues relevant to Food Law Enforcement.

The Service is required to submit via Local Authority Enforcement Monitoring System (LAEMS) an Annual Return to the FSA Wales. This details the inspections achieved, enforcement and educational activities undertaken.

Feed

Quality systems are also in place to ensure that work is completed and checked by a competent person in line with the fully documented Quality Monitoring Procedures. Documented procedures and work instructions exist to ensure consistency of approach with various computer report mechanisms to check accuracy on the APP Database. Work Instruction is provided on Key Areas of work retained within Formal Procedure Manuals.

In addition, for the whole service external audits including focused audits, are undertaken by the Food Standards Agency Wales (frequency determined by FSA). The Service received a full audit by the Food Standards Agency Wales in October/November 2013. The revisit to this audit was carried out by 3 auditors in November 2015.

6.0 REVIEW PROCESS

6.1 Review against Service Plan

The Service Plan shall be subject to annual review. Performance against this Service Plan is monitored by several means:

- (a) Quarterly Performance Reports to the Overview and Scrutiny Committee detailing performance against the Improvement Priorities and six monthly reports on other performance data and any key issues arising. A final yearly Performance Review Report is also submitted.
- (b) Monthly minuted Team Meetings with actions and relevant timescales detailed.
- (c) Monthly One to Ones with individual Team Members.
- (d) Weekly informal Team Briefings which set the focus and priorities for that coming week.

6.2 Review of Performance Against 2016-2017 Service Plan

As detailed in 3.0, the Food Service Team have performed to an excellent standard achieving the target for all Service Improvement Data. They are also in line with the Audit Action Plan for the Food Standards Agency Wales.

Appendix 3 provides full quantitative analysis of service delivery during 2016-17.

Food Safety and Food Standards

General achievements of note are listed below:

- Achieved 100% of High Risk Food Hygiene inspections
- Achieved 100% of D and E Risk Band Food Hygiene Inspections
- Exceeded the target for the percentage of new food businesses we became aware of within the year

receiving an inspection for both Hygiene and Standards

- Achieved 100% of High Risk Food Standards inspections
- Achieved 100% of B Risk band Food Standards inspections
- Achieved 94% of C Risk (Low risk) Food Standards inspections.
- The percentage of premises with a Food Hygiene rating of 5 has increased from 71.9% to 74.5%. 96.3% of businesses have a rating of 3 or higher compared to 95.7% in the previous year.
- Carried out survey work on non-display of food hygiene ratings in all 0-2 rated premises
- As a result of the work carried out in Opson VI, we identified a product which contained a substance not permitted in food. This resulted in a national Food Incident and the product being removed from the market.

Feed

Achievements for 2016/17:

- FCC continued to work with FSA Wales and in collaboration with the five other North Wales Local Authorities to develop and implement the FSA Wales funded North Wales Feed Service Delivery Plan. The plan is to enable a uniform and consistent approach to feed service delivery across Wales making best use of limited financial and officer resource in improving and maintaining feed hygiene and standards across the industry.
- The overall target for inspection of registered feed premises for Flintshire for 2016/17 was 78 premises in total (made up of 52 High Risk and 26 Low Risk) as set by FSA Wales. However, on inspection it was found that some businesses had ceased trading while others had changed the feed activities that they are performing as part of their business from high risk activities to those classed as low risk. In addition to this on inspection it was found that a number of Feed Business Operators had registered their businesses incorrectly as being high risk rather than low risk. Following these inspections the Flintshire Feed Register has been updated to reflect these changes and to ensure that the record is an accurate reflection of registered feed activities being undertaken. The end result of inspection work conducted was a total of 81 premises inspections made up of 23 High Risk

and 51 Low Risk, plus 7 premises found to have ceased trading.

- The four feed officers (0.4 FTE) attended a number of feed training events organised by both FSA Wales and the North Wales collaboration. These included sampling and inspection training/refresher events and update training on legislation. All officers have maintained their CPD and met the minimum requirements set for CPD by FSA Wales.

6.3 Areas of Improvement 2017-2018

Areas requiring focus for the forthcoming year are as follows:

- Continue work on full implementation of the FSA audit action plan in line with the stated completion dates. These are detailed in Appendix 4.
- Identify and inspect businesses that are not currently registered as a food business but that sell food supplements and so require registration and inspection.
- Inspect all schools due to changes in provider of school meals.
- Inspect all after school clubs that fit within the scope of being classed as a food business.
- Further develop the website pages in relation to our service area to signpost businesses to advice and updates on legislation.
- Inspect all premises which have not had a full food hygiene inspection since the introduction of mandatory display and are not due a full inspection this year. This is to ensure all business that fall within the scope of the Food Hygiene Rating (Wales) Act will have a food hygiene rating sticker which they must display.

Feed

- Flintshire are to continue as a member of the North Wales Feed Enforcement Delivery Plan collaboration and will deliver a Feed Service in compliance with the requirements of the FSA funded regional delivery plan and in accordance with the Feed Law Enforcement Code of Practice (FLECP).
- Continue to maintain and update the Flintshire Register of Feed Premises.

- Further develop and improve feed premises records systems and continue to improve recording of all feed enforcement and advice work including use by officers of written inspection reports with copies supplied to business on completion of each inspection/intervention.
- Continue to develop and implement a documented Alternative Enforcement Strategy (AES) for use with low risk premises and premises that have 'earned recognition'.
- Continue the further development of documented procedures for Feed in line with the documents that have been produced by WHO/TS/FSA Working Group for use by all Welsh Local Authorities.
- Continued review and updating of the feed premises database to be undertaken to ensure accuracy and compliance with the requirements of the FLECP.

6.4 Forthcoming Considerations

There are several considerations which may influence or impact on Service Delivery for 2017/18. These are detailed below:

Food Safety and Food Standards

The Service Plan relies on the current level of staffing to be maintained. These posts will need to remain filled for the whole of 2017/18 for the commitments made for Service Delivery to be met.

A further consultation is due on the Food Law Code of Practice (Wales). We have been informed by FSA Wales this will be undertaken over the summer period. It is not yet known when the revised Code of Practice will be introduced.

The Food Standards Agency launched a consultation early in 2016 regarding changing the delivery model for Food and Feed Controls called Regulating the Future (RoF). The objective of the programme is to 'define and then deliver a new regulatory blueprint for a food industry unrecognizable from the one that existed when the current system was designed'. The proposal is to radically alter the blueprint of the delivery model to best support compliance and protecting consumers' interests in line

with the FSA's 2015-20 Strategy of 'food we can trust'. The FSA are working to a timetable of January 2020 for the blueprint to be finalised. However, they have stated that where immediate incremental improvements can be made, these will be introduced sooner. A RoF Local Authority Update day is being held in July 2017, to which each LA is expected to attend.

Effect of EU Exit – initial details of EU exit in the context of Food Hygiene and Food Standards legislation are going to be delivered at the RoF update day being held in July 2017

Feed

The current delivery model for feed service delivery on a regional basis is now entering its third year of operation, with targets being set by FSA Wales and all work being paid for on completion against a fixed price menu dependent on feed activity and inspectable risk. Although the new delivery model appears to be working well the FSA's intentions are not known beyond the end of 2017/18 with regard to expectations from Local Authorities or any funding to Local Authorities for feed service delivery.

The Service Plan relies on the current level of staffing to be maintained. These posts will need to remain filled for the whole of 2017/18 for the commitments made for Service Delivery to be met.

The impact of the UK's exit from the EU on Feed Law Enforcement is currently unknown.

The Regional coordinator for the North Wales Feed Enforcement Delivery Plan has advised all LA's including Flintshire that the FSA propose to carry out an audit of Feed Service delivery across North Wales during 2017, although no date has yet been set for this.

Point of Special Note

Following the FSA audit in 2013, the Food Safety and Food Standards elements of the Food Service received a follow up audit in November 2015 to assess progress with the audit action plan.



It is anticipated we will receive a further revisit sometime within 2017-18. It is hoped the majority, if not all recommendations can be signed off at this time.

There may also be a national focused audit on the implementation of The Food Hygiene Rating (Wales) Act 2013. The proposed format for this audit is desk top for all Local Authorities in Wales with physical audit at a reduced number of Local Authorities for verification purposes.

GLOSSARY OF TERMS

Food Standards Agency Wales - is a non-ministerial government department supported by seven agencies and public bodies. It is the central competent authority for the UK in relation to European Union food legislation. In Wales, it is responsible for Food Safety and Hygiene and Food Labelling Policy. It works with local authorities to enforce Food Safety, Standards and Feed regulations.

Food Law Code of Practice (Wales) 2014 - the Food Law Code of Practice is issued under section 40 of the Food Safety Act 1990 (the Act), regulation 24 of the Food Hygiene (Wales) Regulations 2006, 1 and regulation 6 of the Official Feed and Food Controls (Wales) Regulations 2007, and sets out the execution and enforcement of that legislation by Food Authorities. It relates to Wales only.

EU Regulation 853/2004 – is one of a set of three regulations that relate to Food Hygiene. This specific set of regulations supports the general hygiene requirements set out in EU Regulation 852/2004 and lays down specific regulations for products of animal origin.

Natural Resources Wales (NRW) – is the largest Welsh Government sponsored body. It was formed in 2013 and took on the functions of the Environment Agency, Countryside Council for Wales, and Forestry Commission Wales in addition to other Welsh Government functions. It is the principal advisor to Welsh Government on issues relating to the environment and its natural resources as well as being a regulator of these areas.

Centre for Environment, Fisheries and Aquaculture Science (CEFAS)

– is an executive agency sponsored by the Department for Environment, Food, Fisheries and Rural Affairs which collects, manages and interprets data on the aquatic environment, biodiversity and fisheries.

North Western Inshore Fisheries and Conservation Authority (NW IFCA) - the North Western Inshore Fisheries and Conservation Authority was established under the Marine and Coastal Access Act 2009 and the North Western Eastern Fisheries and Conservation Order 2010. NWIFCA is one of 10 IFCA managing and regulating English coastal waters. The statutory duties of the IFCA are set out in the Act

Ship Sanitation Certificate - A Ship Sanitation Certificate is a document that corroborates a ship's compliance with maritime sanitation and quarantine rules specified in article 39 of the International Health Regulations (2005) issued by the World Health Organization.

Food Hygiene Rating (Wales) Act 2013 – this Act introduces a national food hygiene rating scheme in Wales.

North Wales Feed Law Enforcement Delivery Plan (NWFLEDP) - is the FSA Wales funded plan that was introduced in April 2015 following a review by FSA Wales in 2014 of the delivery of feed law enforcement across Wales. The plan is delivered regionally through the collaboration of the six North Wales local authorities with Wrexham CBC

acting as the project lead authority to deliver against priorities that are reviewed and set annual by FSA Wales.

The Feed Law Code of Practice (Wales) 2014 (FLCP) - sets out instructions and criteria to which local authorities 'the feed authorities' should have regard when engaged in the enforcement of animal feed law. Feed authorities must follow and implement the provisions of the Code that apply to them. It relates to Wales only. There is separate provision in England.

Enforcement Concordat - the Government introduced the Enforcement Concordat in 1998 in collaboration with business and local and national regulators. The aim was to promote good enforcement that brings benefits to business, enforcers and consumers. The Enforcement Concordat encourages partnership working between enforcers and businesses, and sets out the Principles of Good Enforcement which enforcers should apply in order to achieve higher levels of voluntary compliance.

Regulators' Compliance Code - this Code was laid before Parliament in accordance with section 23 of the Legislative and Regulatory Reform Act 2006 ("the Act"). Regulators whose functions are specified by order under section 24(2) of the Act must have regard to the Code when developing policies and operational procedures that guide their regulatory activities. Regulators must equally have regard to the Code when setting standards or giving guidance which will guide the regulatory activities of other regulators.

Local Government Performance Improvement Framework – The framework under which local government collects, compares and publishes its own set of performance indicators alongside the Welsh Government's national set of performance indicators. The Performance Improvement Framework focuses on three distinct areas:

- National Strategic Indicators (NSIs): statutory indicators set by Welsh Ministers
- Public Accountability Measures (PAMs)– local authority owned measures designed to contribute to public accountability; and
- Service Improvement Data (SIDs)- meaningful datasets for use by services and their regulators to support service improvement.

Local Authority Enforcement Monitoring Systems (LAEMS) – LAEMS is a web-based system used to report local authority food law enforcement activities to the Food Standards Agency.

Alternative Enforcement Strategy – every Competent Authority must devise an Alternative Enforcement Strategy to determine how they will conduct official controls duties at premises rated as low risk (i.e. rated Category E for food hygiene and Category C for food standards)

Better Regulation Delivery Office – the Better Regulation Delivery office oversees the Primary Authority Scheme. They are part of Regulatory Delivery which combines policy expertise and practical experience to ensure that regulation is effectively delivered in ways that reduce burdens on business, save public money and properly protect citizens and communities.

Primary Authority - the principles of Primary Authority are set out in the Regulatory Enforcement and Sanctions Act 2008 (as amended), and is overseen by the Better

Regulation Delivery Office (BRDO) on behalf of the Secretary of State for the Department for Business, Innovation and Skills (BIS). The FSA works closely with BRDO in its work to support the delivery of Primary Authority for food regulators.

The scheme gives businesses the right to form a statutory partnership with one Competent Authority, which then provides robust and reliable advice for other Competent Authorities to take into account when carrying out inspections or dealing with non-compliance.

Home Authority Principle – is the principle which operates in situations when a business does not have a Primary Authority partnership in place (e.g. if a business chooses not to enter into a partnership or is legally unable to have one), but where there remains a clear need for regulatory activity in relation to that business to be co-ordinated. For example, instances of non-compliance that could be geographically widespread, potentially leading to similar but unconnected regulatory interventions by several Competent Authorities. It is governed by a Joint Statement of Commitment (JSoC) signed in June 2011 by BRDO, the Trading Standards Institute (TSI) and the Chartered Institute of Environmental Health (CIEH).

Local Government Regulation - Local Government Regulation is one of the six bodies that form the Local Government Group overseen by the Local Government Association (LGA). It provides advice and guidance to a number of regulatory services in the United Kingdom. The organisation provides guidance notes at its website and appoints some Local Authority experts as 'Lead Officers', contacts who will advise other officers.

UK Food Surveillance System (UKFSS) - the UK Food Surveillance System (UKFSS) is a national database for central storage of analytical results from feed and food samples taken by enforcement authorities (local authorities and port health authorities) as part of their official controls.

Food Alert – a “Food Alert for Action” (FAFA) is a communication from the FSA to a Competent Authority concerning a food hazard or other food incident, and a “Food Alert Update” must be read accordingly. Where the FSA requires any actions/responses by the Competent Authority, these will be clearly specified.

Food Incident - a “food incident” is defined as any event where, based on the information available, there are concerns about actual or suspected threats to the safety or quality of food and that might require intervention to protect consumers' interests.

Veterinary Medicines Directorate (VMD) - protects animal health, public health and the environment. It promotes animal health and welfare by assuring the safety, quality and efficacy of veterinary medicines. As an executive agency of the Department of Environment, Food and Rural Affairs (Defra) it contributes to Defra’s objectives to protect public health and meet high standards of animal welfare. Its work also helps the Food Standards Agency to protect and improve the safety of food people eat.

The Animal and Plant Health Agency (APHA) - was launched on 1 October 2014. It merged the former Animal Health and Veterinary Laboratories Agency (AHVLA) with parts of the Food and Environment Research Agency (FERA) responsible for plant and bee health to create a single agency responsible for animal, plant and bee health.

Chartered Trading Standards Institute (CTSI) – is a professional membership association formed in 1881. It represents trading standards professionals working in the UK and overseas in local authorities, the business and consumer sectors and in central government. It exists to promote and protect the success of a modern vibrant economy, and to safeguard the health, safety and wellbeing of citizens by enhancing the professionalism of its members.

National Trading Standards (NTS) - was set up in 2012 by UK Government as part of changes to the consumer protection landscape. Its role is to provide leadership, influence, support and resources to help combat consumer and business detriment nationally, regionally and locally. Bringing together trading standards representatives from England and Wales to prioritise, fund and coordinate national and regional enforcement cases.

Wales Heads of Trading Standards (WHoTS) - represents the 22 Trading Standards Services in Wales. The aim of WHoTS is to work in partnership to provide a coordinated, consistent and improved service to Welsh Businesses and Welsh Consumers. WHoTS was formed in response to the demand for continuous service improvement in Wales.

The organisation acts under the auspices of the Directors of Public Protection Wales and provides a strategic leadership role for the Welsh Service.

Critical Control Points (CCPs) - animal health and welfare CCPs are set by Welsh Government and are defined as being the agreed businesses, premises or locations at which controls can be applied resulting in the reduction in risk of the introduction or spread of notifiable disease in England and Wales.

Continuing Professional Development - Continuing Professional Development (CPD) is the means by which professionals maintain and enhance their knowledge and skills.

Regulating Our Future – is the Food Standards Agency programme of fundamental redesign of regulatory roles and of the way in which regulation is delivered. The aim is to provide a sustainable regulatory model for food businesses in England, Wales and Northern Ireland by 2020.

Chart 1

FLINTSHIRE COUNTY COUNCIL - ORGANISATIONAL STRUCTURE

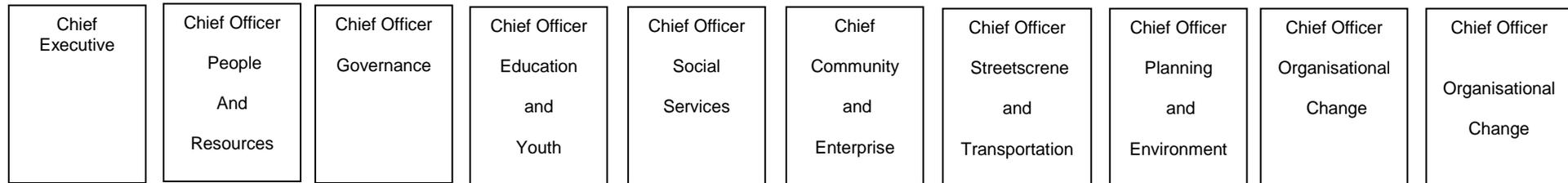


Chart 2

FLINTSHIRE COUNTY COUNCIL – POLITICAL STRUCTURE

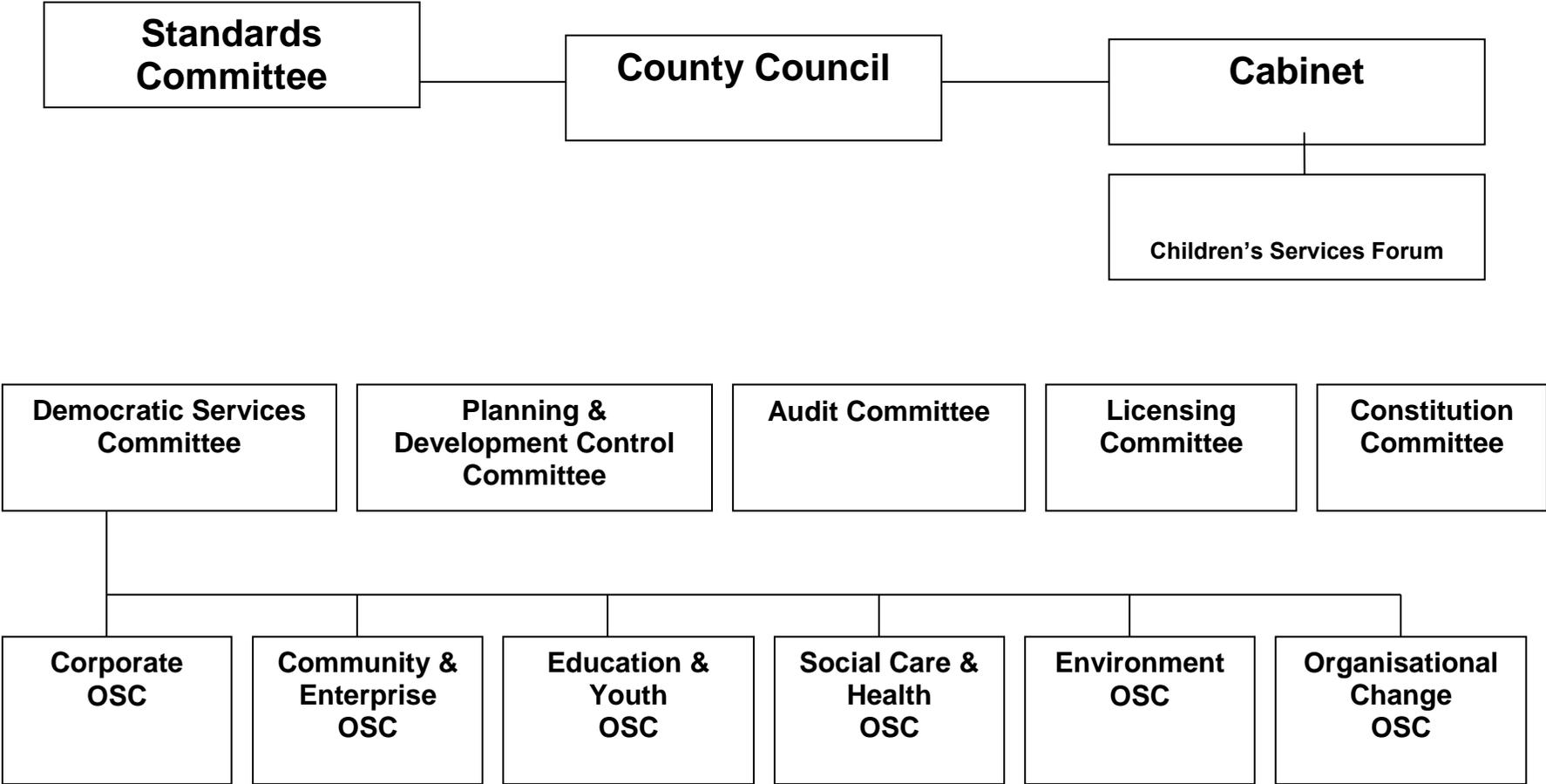
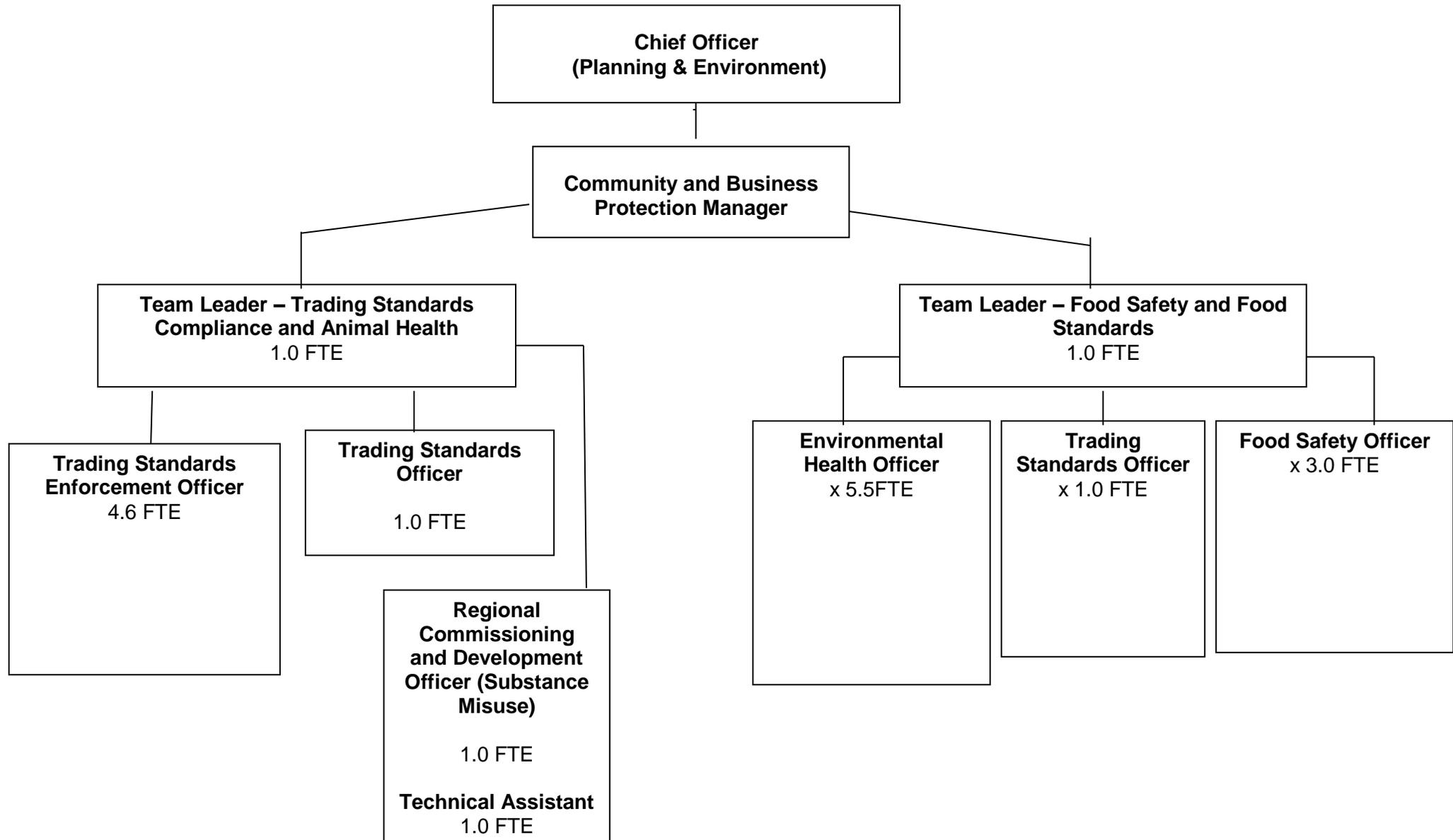


Chart 3

COMMUNITY AND BUSINESS PROTECTION - FOOD SERVICE



APPENDIX 2

Please find below a breakdown of the profile of programmed Food Safety and Food Standards inspections for 2017-18 by Risk Rating:

Table A

PROGRAMMED INSPECTIONS - FOOD SAFETY	
Risk	Number Due
A	5
B	20
C	284
D	121
E	151
Unrated	24
TOTAL	605

Table B

PROGRAMMED INSPECTIONS - FOOD STANDARDS	
Risk	Number Due
A	13
B	187
C	72
Unrated	32
TOTAL	304

The Risk Rating is determined in accordance with the Food Law Code of Practice. It dictates the frequency of which the food premises must receive a full food hygiene or food standards inspection.

For Food Safety High Risk premises are those with a Risk Rating of A - C. For Food Standards High Risk premises are those with a Risk Rating of A.

Please find below a breakdown of the profile of programmed Feed inspections for 2017/2018 by Feed Business Activity:

Table C

	PROGRAMMED INSPECTIONS - FEED	
High Risk (ATL)/Low Risk (BTL)	Registered/Approved Feed Business Activity	Number Due
High Risk	Manufacturer of Feed	2
High Risk	Co Product Producers	0
High Risk	Feed Stores	0
High Risk	Feed Distributor	1
High Risk	Feed Transporter	4
High Risk	On Farm Feed Mixers	21
High Risk	Supplier of Surplus Food	8
High Risk	Pet Food Manufacturer	1
Low Risk	Livestock Farms	80
Low Risk	Arable Farms	0
	Total	117

The type (by feed activity) and number of feed inspections to be conducted during 2017/18 by Flintshire has been determined by FSA Wales. This is as part of year three of the current FSA Wales funded North Wales Feed Enforcement Delivery Plan.

APPENDIX 3 – PERFORMANCE 2016-17

Food Safety

Risk	Programmed	Achieved
A) High Risk	2	100%
B) High Risk	31	100%
C) High Risk	262	100%
D Low Risk	124	100%
E Low Risk	198	100%
Unrated	30	100%
TOTAL	647	

TOTAL Number of Interventions Undertaken (including Revisits)	955
--	------------

Food Standards

Risk	Programmed	Achieved
High	13	100%
Medium	187	100%
Low	151	94%
Unrated	144	93.8%
TOTAL	495	

TOTAL Number of Interventions Undertaken (including Revisits)	608
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Feed Inspections (as per requirements of FSA/WHoTS Regional FLEDP 2016/17)

Risk	Programmed	Achieved
High	52	23
Medium/Low	26	51
Premises found on inspections to have ceased trading	0	7
TOTAL	78	81

- Please note that the discrepancy between targets set and what was achieved during 2016/17 was due to premises that were subjected to a first feed premises inspection after the business registering with Flintshire being found to have been incorrectly registered by the Feed Business Operator when they applied for their initial registration.
- In all cases where this was found to be the case the business had registered for a High Risk (above the line) feed activity either by mistake rather than the correct Low Risk (below the line) activity or in some cases the business had changed feed activity since first registering.
- In addition to this a total of 7 premises registered with Flintshire were found on inspection to have ceased any feed activity and as a result have had their feed registration cancelled on the Flintshire Feed Register.

Food Hygiene Ratings

Profile of Ratings within Flintshire: May 2017

	5 Very Good	4 Good	3 Generally Satisfactory	2 Improvement Necessary	1 Major Improvement Necessary	0 Urgent Improvement Necessary
% of Premises *	74.5	17.3	4.6	1.7	1.5	0.0

*Figures have been rounded to one place of decimal so does not = 100%

Number of Requests for Rescore Visit to be undertaken - 31

Number of Appeals on Rating - 3

Other data in relation to Demands on Food Service

Food and Feeding Stuffs Complaints

Food Safety number of complaints - 96
Food Standards number of complaints - 13
Feeding Stuffs number of complaints - 0 (Nil)

Advice to Business

Food Safety - 158 requests for advice
98.7% responded to within 10 working days

Food Standards - 13 requests for advice
84.6% responded to within 10 working days

Feeding Stuffs - 15 requests for advice – primarily regarding new registrations were received, all were responded to within 5 working days.

Food and Feeding Stuffs Inspection and Sampling

Food Safety	-	62	samples – statutory and monitoring
Food Standards	-	103	samples – monitoring for composition and labelling

Feeding Stuffs - No complaints regarding animal feeding stuffs were received during the period 2016/17 and therefore no complaint samples were taken. Sampling was undertaken across North Wales as part of project work carried out at the request of FSA Wales as part of the North Wales Feed Law Enforcement Delivery Plan. In Flintshire this sampling included the taking of the following samples:

- 1 x Silage sample taken for analysis for the presence of Heavy Metal residue.
- 1 x Maize sample taken for analysis for presence of Mycotoxins.
- 1 x Poultry Layers Pellets sample taken for analysis for presence of Salmonella

Control and Investigation of Outbreaks and Food Related Infectious Disease (Food Safety only)

Sporadic Notifications	-	216	(of which 154 were Campylobacter)
Outbreaks	-	2	(found not to be food-related)

Other Types of Service Requests (Food Safety only)

<u>Water Disconnections</u>	-	21	
<u>Shellfish Requests for Registration Documents</u>	-		these are now administered by Natural Resources Wales on our behalf
<u>Ship Sanitation</u>	-	2	
<u>Export Certificates</u>	-	57	– substantial increase as a business changed production to their Flintshire site

APPENDIX 4 – FOOD STANDARDS AGENCY WALES REVISED AUDIT ACTION PLAN

Status Key

	Completed
	Good Progress
	Limited Progress
	No Action Taken

Updated Action Plan for Flintshire County Council (Excluding Feed Service*)

Audit Date: 28 October - 1 November 2013

Follow-Up Visit Date: 26 November 2015

(*) Actions arising from the audit in relation to animal feedingstuffs have not been included. A new regional feed delivery model was introduced in Wales from April 2015.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
3.18(i) Ensure future Food Service Plans are developed in accordance with the Service Planning Guidance in the Framework Agreement. More comprehensive information on the authority's service should be provided together with a robust analysis of the resources required to deliver the food services against those available. [The Standard – 3.1]		<p><u>Food Hygiene / Food Standards</u></p> <p>This recommendation relates to:-</p> <p>a.) Lack of inclusion of the number of approved premises in the County.</p> <p>b.) Lack of inclusion of the resource requirements to deliver the Food Service in accordance with the Food Law Code of Practice in its entirety.</p> <p>c.) Lack of inclusion of an estimate of the resources required to revisit all 0, 1 and 2 rated premises and for the inspection of new businesses.</p> <p>Future service plans will ensure that all of the above are included and will include an analysis of the</p>	<p>The majority of the planned improvements agreed have been implemented in the 2015/16 Service Plan.</p> <p>Additional improvements required in relation to resource planning have been recognised by the authority and are due to be drafted into the 2016 / 17 Service Plan, prior to the document being agreed by Cabinet.</p>	<p>Ensure that the required resources laid out in the service plan are accurate for inspections and related activity and is also specified for advice to businesses, sampling and promotional work.</p> <p>Revised date for completion: 27/05/16</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
		resources required to fully deliver the food service against those available.		
5.12(i) Review and update all officer authorisations to ensure they are appropriately authorised under current relevant legislation in accordance with their level of qualifications, training, experience and the relevant Code of Practice. [The Standard – 5.3]		<u>Food Hygiene/Food Standards</u> All authorisations will be reviewed and updated where necessary. This will be maintained in line with changes in legislation.	This has already been implemented. Many authorisations updated.	Ensure that all authorisations are updated and further amendments are made to address more recent legislation. Revised date for completion: 27/05/16
5.12(ii) Maintain records of relevant qualifications, training and experience of authorised officers and appropriate support staff in accordance with the relevant Codes of Practice. [The Standard – 5.5]		<u>Food Hygiene /Food Standards</u> Training records already held will be supplemented by copies of CPD certificates which will be held electronically in a central shared drive.	All officers have been asked to provide copies of their CPD For future courses, there is a direct instruction that all CPD is scanned on to the shared drive in addition to being written in the register.	Completed
6.11(i) Review, amend and implement the documented procedure for maintenance and calibration. [The Standard - 6.2]		<u>Food Hygiene</u> The procedure on calibration of thermometers needs to be amended to accommodate the observation that the written procedure did not make specific mention of the tolerance for the	The procedure has been reviewed and has been amended to include specific reference to the tolerance of 0.5°C in the written	Completed

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
		calibration of temperature probes. Although this was cited on the record forms it was not included in the written procedure.	procedure	
<u>Food Hygiene</u> 7.19(i) Ensure that all food premises hygiene interventions/inspections are carried out at the minimum frequency specified by the Food Law Code of Practice. [The Standard -7.1]		This relates to the recommendation that all inspections should be carried out within 28 days of being due. Whilst FCC has consistently achieved 100% of the High Risk inspections due each financial year, some High Risk inspections have not been carried out within 28 days of being due, although they have been done within the annual programme in which they were due. Planned Improvements:- All High Risk inspections due this year are to be completed within 28 days of becoming due. This will be monitored by the Team Leader at monthly one to ones. Any deviations from this 28 day are to be documented on the electronic database.	The authority has instructed all officers to ensure that interventions are completed in date order and improvements have been made in the intervention lists to enable officers to prioritise their workload. Improvement in rate of inspections of all risk categories done at correct frequency.	Ensure more timely food hygiene inspections to meet the 28 day requirement. Revised date for completion: 27/05/16
7.19 (ii) Carry out hygiene interventions/inspections of lower risk premises in accordance with the Food Law Code of Practice and centrally issued guidance.		a.) All overdue D rated inspections and D rated premises due this year are to be completed this financial year. This equates to 175 inspections.	FCC has implemented an Alternative Enforcement Strategy since the	Completed

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
[The Standard -7.2]		<p>b.) D rated inspections due this year are to be done within 28 days of being due.</p> <p>c.) An Alternative Enforcement Strategy (AES) is to be devised and implemented to pull in all overdue E rated premises within a 2 year period.</p>	<p>audit was undertaken.</p> <p>Improvements to process of approvals, risk rating & revisits.</p>	
7.19 (iii) Ensure that observations made and/or data obtained in the course of an inspection is recorded in a timely manner. [The Standard – 7.5]		<p>This recommendation relates to the auditors view that insufficient information was being provided by officers in some instances on the aide memoir that is used to assist officers during their inspections.</p> <p>Planned Improvements:- Officers are to complete the aide memoir to sufficient detail to enable other officers to make the necessary assessment to inform risk-based, graduated action.</p>	<p>Officers have been directed to complete as much of the aide memoir they need to, to ensure the next inspecting officer can ascertain the level of practices in place at the time and the assessment of whether those practices etc were adequate. The Internal Monitoring procedure already included an assessment of this form being filled in comprehensively, prior to the FSA audit.</p> <p>Some improvements</p>	<p>Ensure further improvements to capture of officer observations during food hygiene interventions including assessments of HACCP, cross contamination and training compliance and checking of ID marks for incoming food.</p> <p>Revised date for completion: 27/05/16</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
<p><u>Food Standards</u> 7.34 (i) Ensure that food standards interventions are carried out at a frequency not less than that determined under the intervention rating scheme set out in by the Food Law Code of Practice and assess the compliance of establishments and systems to the legally prescribed standards. [The Standard -7.1 & 7.3]</p>		<p>This relates to the recommendation that all inspections should be carried out within 28 days of being due. Whilst FCC has consistently achieved 100% of the High Risk inspections due each financial year, some High Risk inspections have not been carried out within 28 days of being due.</p> <p><u>Low and Medium Risk Premises</u> There is a back log of premises that are overdue their food standards inspection.</p>	<p>made.</p> <p>The authority has instructed all officers to ensure that interventions are completed in date order and improvements have been made in the intervention lists to enable officers to prioritise their workload. The Team Leader had already identified this was an issue in the 2013/14 Service Plan prior to the audit and had devised an Action Plan.</p> <p>All EHOs have been allocated Food Standards inspections to do at the same time as they carry out Food Hygiene Inspections as of March 2014.</p>	<p>Ensure food standards interventions are carried out at the required frequency.</p> <p>Original date for completion: March 2017.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
			<p>Since the audit, 2 Food Safety Officers are completing the Food Standards module to enable them to be competent to carry out food Standards work.</p> <p>The Team has all been brought together in to the same office which is assisting in communication, monitoring of work being undertaken and aligning work culture and processes.</p>	
<p>7.34(ii) Carry out interventions/inspections and register establishments in accordance with the relevant legislation, Codes of Practice, and centrally issued guidance. [The Standard -7.2]</p>		<p><u>Food Standards</u></p> <p>This recommendation relates to announced Food Standards inspections taking place but the reason for the visit being announced, (rather than unannounced) not being recorded.</p>	<p>Inspections are to be unannounced, unless there is valid, documented reason for the visit to be announced.</p> <p>Improvements in inspection coding.</p>	<p>Ensure further improvements to food standards intervention and intervention records to capture information on announcement and ensure consistent risk rating.</p> <p>Revised date</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
				for completion: 27/05/16
7.34 (iii) Set up, maintain and implement a documented food standards revisit procedure. [The Standard 7.4]		This recommendation relates to the Revisit Procedure not mentioning Food Standards revisits in it. Planned Improvement:- A Revisit Procedure / Policy for Food Standards will be written.	A revisit policy / procedure has been written for Food Standards.	Completed
7.34 (iv) Record observations made and/or data obtained in the course of an inspection/intervention in a timely manner to prevent loss of relevant information. [The Standard 7.5]		An aide memoir is to be produced for Food Standards inspections that is used by all officers undertaking Food Standards inspections.	EHOs undertaking Food Standards work have been recording findings on their aide memoir in the relevant Food Standards section. This has not been done by the TSO and TSEO. A draft form has just been produced and has been sent to the team for comment.	Completed
8.12 (ii) Investigate complaints received in accordance with the Food Law Code of Practice, centrally issued guidance and its own policy and procedures. [The Standard – 8.2]		In light of the auditors view that the Complaint procedure for Food Hygiene and Food Standards had not been followed in all instances, this procedure will be amended to allow deviation from it in circumstances when it is not appropriate to investigate a complaint. A clear policy on when a	The procedure has been amended to include reference to an investigating officer being able to deviate from the procedure as long as they record the reason for this	Ensure that food hygiene and standards complaints are processed without significant delays. Revised date for completion: 27/05/16

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
		complaint should not be investigated will be set out.	deviation on the complaint file and this deviation can be justified on public health grounds. Some improvements in complaint investigations.	
12.12(ii) Review, update where necessary, maintain and implement the documented sampling procedures in respect of the procurement and preservation of samples (food), in accordance with the relevant Codes of Practice and centrally issued guidance. [The Standard - 12.5]		<u>Food</u> The Food Hygiene Sampling Procedure will be amended to cover specific instructions on the storage of food samples following sampling. This was already in place at the time of audit for the Food Standards Sampling Procedure. The Food Sampling Policy already sets out the information on procurement of samples.	The Food Hygiene Sampling Procedure has been amended to include this additional safeguard. Food procedures amended.	Ensure unsatisfactory food standards samples are followed up appropriately Revised date for completion: 27/05/16.
14.8 (i) Ensure the feed incidents procedure includes out-of-hours contact arrangements and guidance for officers on responding to feed alerts notified by the FSA and the procedure for responding to food safety incidents is suitably amended to include the back-up		Procedure to be reviewed in line with FSA's comments. There are no formal out of hours arrangement in place. However, details of current out of hours arrangements (as per animal health/disease incidents dealt with by AH&HP Team) through Call-Connect to be shared with FSA.	Recommendation completed in relation to Food Safety	Completed

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
arrangements.. [The Standard – 14.1 and 14.4]				
15.14 (i) Ensure that food hygiene law enforcement is carried out in accordance with the Food Law Code of Practice, centrally issued guidance and the authority's own documented procedures. [The Standard -15.2 & 15.3]		a) The team are to attend Enforcement Sanctions training in May 2014. b) Explanations to always be recorded on premises file when procedure has been deviated from.	Review has been undertaken of detailed points raised by the FSA audit and corrective measures put in place where necessary.	Ensure Hygiene Improvement Notice is appropriate course of action and that compliance is confirmed in writing in all cases. Ensure the service of Remedial Action notices is on the correct food business operator in all cases.
15.14(ii) Ensure all enforcement decisions are made following consideration of the authority's enforcement policy and the reasons for departure from the policy are documented. [The Standard -15.4]		This recommendation relates to there not being explicit explanation as to why a food business operator had not been prosecuted instead of being served with a hygiene improvement notice.	The aide memoir form had already been amended prior to the audit to include a section on enforcement action and rationale.	Ensure decisions on enforcement actions are escalated in accordance with the enforcement policy or reasons given for departure from the policy.
<u>Food Hygiene</u> 16.7(i) Record, with reasons any deviations from set procedures. [The Standard – 16.1]		This recommendation relates to instances of audit reports being sent out after 14 days to the food business operator but there being no explanation for the delay in it being sent recorded on file. In future deviations on the reports	The Team Leader had already introduced a system for identifying when reports are being sent out to ensure that reports were	Completed

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
		being sent out later will be recorded on file.	being sent out within 14 days in compliance with the Food Hygiene Rating Scheme. Any deviation on reports going out is recorded on the database.	
<p><u>Food Standards</u> 16.15(i) Maintain up to date and accurate records in retrievable form on all food establishments in its area in accordance with the Food Law Code of Practice and centrally issued guidance. These records shall include reports of all interventions/inspections, the determination of compliance with legal requirements made by the authorised officer, details of action taken where noncompliance was identified, details of any enforcement action taken, and relevant food registration information. [The Standard -16.1]</p>		<p>This recommendation relates to:</p> <ul style="list-style-type: none"> a.) Paper-based premises files not being available for all premises in relation to Food Standards. b.) The database records not being comprehensive. c.) Inspection report forms not giving a breakdown of legal contraventions and what was only recommendation. d.) The report of inspection form did not have all the information on it that it is supposed to have. <p>Improvements:-</p> <ul style="list-style-type: none"> a.) Merge premises files between Food Hygiene and Food Standards. b.) Database records to be comprehensive by scanning 	<p>All team members are now in the same office. This has allowed the merging of premises files to start. Food Safety already had a file for each premises and so Food Standards information is being put on to these same files. All documents are being scanned on to the database as part of the new Mobile and Agile working practice. Prior to the audit, documented instruction had been given to ensure</p>	<p>Ensure food standards reports / records distinguish clearly between contraventions and recommendations and clearly specify the legislation.</p> <p>Revised date for completion: 27/05/16</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
		<p>on all documents as of February 2014.</p> <p>c.) Provide a clear distinction between legal contravention and recommendation.</p> <p>d.) Devise a new report of inspection form for Food Standards and set up a template letter for use, similar to Food Hygiene templates.</p>	<p>there was a clear distinction between legal contravention and recommendation. This is also being monitored by the Team Leader.</p> <p>Quotes have been requested for the alterations to be made to the Food Standards Inspection Form.</p>	

Summary (excluding feed)

Total Recommendations	18
Completed	7
Good Progress	11
Limited Progress	0
No action	0
Total Outstanding	11