



FOOD SERVICE

SERVICE PLAN

2014-2015



FLINTSHIRE COUNTY COUNCIL FOOD SERVICE PLAN 2014-15

INTRODUCTION

The Service Plan relates to the year commencing 1st April 2014 and ending 31st March 2015.

It covers the service provision for the Food Safety, Food Standards and Feedstuffs 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 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”.

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 2014-15

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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 feeding stuffs 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 and feed premises 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 Community Strategy 2009-2019 and the Improvement Plan for the Council. There are five key priorities contained in the Community

Strategy, 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 has direct links with the Environment Directorate Plan 2013 Onwards and the Public Protection Service Plan. The Public Protection Service Plan contains annually revised 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.

The Food Service links with the Council's Community Strategy and with some of the key strategic priorities of Welsh Government such as the "Health, Social Care and Well-Being Strategy" and "Health Challenge Wales".

Food Safety is a statutory duty of the Council. Targets to be achieved are set in relation to both National Strategic Indicators and Service Improvement Data. A Corporate Performance Management System monitors performance of all services within the Council and these are reported quarterly. The areas reported on are the National Strategic Indicator, "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 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.

The Food Service will participate actively in strategies

and programmes associated with the “Wales Programme for Improvement” and the “Making the Connections Agenda” and 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 and there is a small port located at Mostyn.

2.2 Organisational Structure

The organisation structure of the Food Service which is located within the Public Protection Service of the Environment Directorate is illustrated on the Charts which also detail where the service fits in the Management and Cabinet structure of the Council. The Charts are detailed within Appendix 1.

This structure is due to change as part of the Flintshire Futures Programme. The initial stage of this change takes place on 1st June 2014, when the new Senior Management Operating Model is implemented. The Food Service will sit within the Planning and Environment portfolio under a Chief Officer. The detailed structure of the Public Protection service under the Chief Officer will be designed and implemented during 2014-15.

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

2.3 Scope of the Food Service

The Food Service is part of the Public Protection Service within the Planning and Environment portfolio area.

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 the Team Leader – Animal Health and Health Promotion. These functions sit within the Health Protection Service area of Public Protection, which is overseen by the Health Protection Manager.

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:

- 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 National Food Hygiene Rating Act.
- Investigation of food complaints that relate to fitness of food for human consumption as well as food complaints that relate to the nature, substance or microbiological quality of the food, taking appropriate action as necessary. In addition, investigation of all complaints which relate to hygiene matters (premises, practices, personnel) in food businesses.
- Investigation of sporadic cases of food (including 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 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.
- Educational and promotional initiatives

Food Standards

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

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

- Respond to requests for consumer advice in matters regarding food standards, labelling and composition.
- Undertake a pre-planned programme of visits to food premises within Flintshire.
- 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 including promotion of the use of the Flintshire Trading Standards Information Pack.
- 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 Hygiene and Feed Standards component of the service has the following responsibilities and service provision:

- Enforcement of relevant feed safety and feed hygiene legislation, in all feed establishments in Flintshire.
- Registration or approval of all Flintshire based feed businesses (dependent on process being undertaken).
- Undertake a pre-planned programme of visits to feed premises within Flintshire.
- Investigation of complaints relating to the nature, substance or quality of feed and complaints relating to mislabelling of feed taking appropriate action as necessary.
- Investigation of feed complaints that relate to fitness of feed for consumption by animals that are intended to enter the food chain for human consumption as well as feed complaints that relate to the nature, substance or microbiological quality of the feed, taking appropriate action as necessary.

- Investigation of all complaints which relate to hygiene matters (premises, practices, personnel) in feed businesses.
- Response to Feed Alerts and feed related incidents taking appropriate action as necessary.
- Advice to new and existing business.
- Undertake feed sampling in accordance with the Sampling Programme and in response to incidents.
- Educational and promotional initiatives

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 1487 food premises in Flintshire. Of the total number of food premises in Flintshire approximately 1034 are caterers, with the remainder being made up predominantly by retailers (approximately 258). The catering establishments cover a wide range of types of premises varying from restaurants, cafes, schools, hotels, pubs, residential care homes, hospitals to mobile food vehicles.

There are currently 40 food manufacturing and packing businesses within Flintshire. The types of food manufacturers within Flintshire vary greatly in the types of processes they use to produce food. These range from a cooked meat manufacturer with national distribution, several 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.

Of these 40 manufacturers, 11 of them are approved under E C Regulation 853/2004 which relates to product specific premises for which there are more onerous requirements for compliance. This places additional requirements on both the food premise and the Local Authority.

Dee Estuary

The Dee Estuary has a thriving cockle industry with three cockle beds falling within Flintshire’s jurisdiction. There are also 2 mussel beds. These beds 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 considerable amount of cross-agency partnership working with National Resources Wales (formally Environment Agency Wales), Wirral Council, the Centre for Environment, Fisheries and Aquaculture Science (CEFAS), other neighbouring Local Authorities, the North West 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.

National Food Hygiene Rating Act

Flintshire County Council implemented the National Food Hygiene Rating Scheme in December 2010. However, since 28th November 2013, the Food Hygiene Rating (Wales) Act 2013 came in to force. The administration of this Act in both the setting up and in its maintenance, accounts for a considerable volume of work for the Team.

Feed

There are 364 feed premises in Flintshire. Of the total number of feed premises in Flintshire approximately 313 are farms, with the remainder being made up of wide range of feed related business activities. There are currently 22 feed manufacturing and packing businesses within Flintshire. The types of feed businesses within Flintshire vary greatly in the types of feed related activity that they are engaged in. These range from feed manufacturers with national distribution, hauliers, wholesalers, and growers through to farmers feeding preparatory brands to their own livestock and those feeding their own crops to their livestock. The diversity in the types of feed businesses operating within the County places a significant demand on the breadth and depth of knowledge required by officers within the Team.

Premises Profile

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

FOOD STANDARDS			FOOD SAFETY			
Risk	Min.	No. of		Risk	Min.	No. of
High	1 year	11	High	A	6 months	2
				B	12 months	49
Medium	2 years	429		C	18 months	539
Low	5 years	854	Low	D	2 years	266
				E	3 years	527
OUTSIDE		141		OUTSIDE		21
UNRATED		52		UNRATED		82
TOTAL		1487		TOTAL		1487

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 Policy of the Council. Approximately 14% of residents in Flintshire are recorded as Welsh speaking. 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.

FEED		
Risk	Min.	No. of
High	1 year	1
Medium	2 years	11
Low	5 years	17
Unrated * *Majority likely to be low risk		335
TOTAL		364

2.5 Enforcement Policy

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.

There is also an Enforcement Policy for residents entitled “Regulation and Enforcement – Involving Local Residents”, which was approved by Council in September 2011.

The new Regulators’ Code 2013 was introduced in April 2014 and work is in hand to review the Enforcement Policy in accordance with any changes that are brought about following this introduction.

3.0 SERVICE DELIVERY

3.1. Food Premises Inspections

Flintshire County Council has one National Strategic Indicator and a number of Internal Performance Indicators relating to Food Safety and Food Standards for 2014/2015 which are detailed in 1.2.

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 to ensure that those premises/traders with a high or medium risk are prioritised for inspection.

The performance of the Food Team in 2013/2014 was excellent with the Team achieving 100% of High Risk inspections for both Food Safety and Food Standards. The target of 87% of new businesses to be inspected for Food Hygiene was exceeded with 88% actually being achieved. Food Standards also achieved their target of 75%. This took considerable efforts from the Team.

There is a National Strategic Indicator in place, namely the percentage of businesses which are Broadly Compliant with Food Hygiene legislation. For 2013-14, this figure has improved from 83.6% to 85.7% of food businesses within Flintshire falling into this category.

For Food Safety, the total number of High Risk programmed inspections for the year 2014/2015 is 418 and for Food Standards, the total number is 11. Food premises which are High Risk for the rest of Trading Standards legislation are inspected by this team. This equates to 19 additional

inspections which will be carried out by the Trading Standards Officer and the Trading Standards Enforcement Officer within the Food Team.

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

- Inspect 100% of High Risk (A-C) rated food premises for Food Safety.
- Inspect 100% of all High Risk (A) rated food premises for Food Standards.
- To inspect all overdue Medium Risk (B) rated premises for Food Standards. To be achieved by combining Food Safety and Food Standards inspections to maximise utilisation of resources and in line with the Better Regulation Delivery Office to reduce the burden on business.
- All D Rated premises for Food Hygiene to receive a full food hygiene inspection. This is as part of a 3 year programme to ensure all D and E rated premises will receive a Food Hygiene Rating. Priority is being given to D Rated premises which are most overdue a food hygiene inspection.
- To use the Alternative Enforcement Strategy (AES) on all eligible E Rated premises for Food Safety.
- To use the AES on one third of all eligible C Rated premises for Food Standards.
- To revisit all premises receiving a National Food Hygiene Rating Scheme score of 2 or lower, in line with the All Wales Revisit Policy written by the All Wales Food Safety Expert Group.

A full breakdown of premises programmed for inspection in 2014-2015 in relation to their Risk Rating is given in Appendix 2. This shows totals of 595 full inspections for Food Hygiene with a further 259 premises being subject to an Alternative Enforcement Intervention and 340 for Food Standard with a further 431 being subject to an Alternative Enforcement Intervention. The Alternative Enforcement Interventions will be carried out over a 3 year period for Food Standards with a third to be achieved this year.

For Feed there is a total of 364 registered feed premises including one High Risk premises, 11 Medium Risk premises and 17 low risk. The high risk premises and all medium and low risk premises due will be inspected. In addition a target of 30% (100) of unrated premises will be assessed during this year as part of a 3 year programme to address all unrated feed premises in Flintshire, subject to the

introduction of the revised Feed Law Enforcement Code of Practice in Wales which is likely to be introduced in 2014/15. Revisits will be undertaken as necessary in line with our documented inspection and revisit procedure.

3.1.1 Additional Targeted Inspection/ Enforcement Activity

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

- A further increase in cross-agency working to target enforcement activity in relation to shellfish activity on the Dee Estuary. This is building on cross-agency working undertaken in 2013/2014.
- An increase in proactive sampling work on Food Standards Authenticity. This is detailed in Section 3.5.
- Effective and professional liaison, communication and co-operation with Iceland Frozen Foods, other LA's and BRDO relating to Primary Authority (PA) matters.
- Continued implementation of all relevant recommendations as identified by Professor Pennington in the Public Inquiry Report using the comprehensive Audit Checklist.
- 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.
- Submit a bid to the FSA Food Safety Management System Grant Funding to provide Food Safety Management/Food Hygiene Training to Takeaways in the medium of Turkish. This bid is being submitted jointly with Wrexham County Borough Council as part of our collaborative working.
- Increased inspection of feed premises.
- Increased proactive sampling of feeding stuffs.
- Increased collaborative working on feeding stuffs as part of the North Wales Trading Standards Collaboration.

3.1.2 Resources for Inspections and Additional Enforcement Activity

The programmed food hygiene inspections will be undertaken by 5.5 FTE Environmental Health Officers (EHO), and 3.0 FTE Food Safety Officers (FSO). A full breakdown of resources is given in 4.2 – Staffing Allocation. Food Standards work will be carried by 1.0 FTE Trading Standards Officer, 0.4 FTE Trading Standards Enforcement Officer until the end of September 2014 and 5.5 FTE EHOs.

2 FTE Food Safety Officers are due to complete their Food Standards module by the end of June 2014, which will enable them to undertake Food Standards inspections also.

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.

It is anticipated that the resource implications of any additional targeted inspection or enforcement activity will be met out of the resource provision outlined above.

Feed

Feed work will be carried by 0.25 FTE Team Leader –Animal Health and Health Promotion based on current resources. Following the anticipated revision of the Feed Law Enforcement Code of Practice in Wales in 2014/15 it is hoped that the two Animal Health Enforcement Officers of the team will be able to conduct some Level One feed inspections, when they visit farms as part of their animal health and welfare duties. This will allow these visits to be included as Feedstuffs inspections and should allow assessment to be undertaken of the unrated premises in line with the target of 30% detailed in 3.1 above.

3.2 Food 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.

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 80 and 150. This equates to 1 FTE (EHO or FSO) and 0.25 FTE of a TSO involved in such investigations.

Feed complaints will be dealt with by the Team Leader Animal Health and Health Promotion as the only fully

qualified TSO within the Animal Health Team. The estimated number of feed complaints for the forthcoming year is 0-5.

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.

3.3 Primary Authority Principle

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 40 food businesses and has entered into a Primary Authority relationship with Iceland Foods Ltd, the National Supermarket chain based in Deeside. The resource implications are equivalent to 0.5 FTE of one EHO/TSO post to deal with this function.

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.

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 on the spot during inspections or upon request, for all Flintshire businesses, including a service in accordance with the BRDO Primary Authority Principle and the LACORS (now LGR) 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. In order to maximize 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 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 200 in relation to Food Safety. Advice to businesses is provided by all members of the Team. The Health Promotion Officer has just completed a revised, user-friendly, comprehensive Business Advisory Pack which is to be circulated to other North Wales Local authorities to use as a template.

For Food Standards, it is anticipated the resource required for Advice to Business is going to increase considerably as there is new legislation governing Food Labelling and Food Standards coming in to force as of December 2014, namely EU Regulation 1169/2011. The Food Information for Consumers Regulations. This, along with The Food Information (Wales) Regulations 2014, which allows for the enforcement of these EU regulations, places considerable new labelling requirements on businesses that have typically had very few requirements under Food Labelling legislation previously and places major changes on small businesses.

We are proposing to carry out advisory work in August and September to assist businesses in being prepared for these changes in December. This will be following a meeting with the Food Standards Agency Wales who are providing guidance to Local Authorities on how to tackle the changes to Allergen labelling in food premises that provide non-pre-packed foods specifically such as restaurants, takeaways and delicatessens.

For Feed it is anticipated that there will be between 5 and 20 requests for advice.

3.5 Food Inspection and Sampling

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. Flintshire belongs to the North West Food Liaison Group which devises a programme of Quarterly Sampling Surveys. The programme will also take 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:

PUBLIC ANALYST SCIENTIFIC SERVICES
WOODTHORNE
WERGS ROAD
WOLVERHAMPTON
WV68TQ

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 England, Food Water and Environmental Microbiology Network (Preston Laboratory), Royal Preston Hospital, Sharoe Green Lane, Preston. PR2 9HT

Each Local Authority is allocated sampling accreditation by the Public Health England in order to undertake Food Safety sampling. Public Health Wales also allocates a limited resource to Flintshire for Food Safety Sampling. This is sent to Ysbyty Gwynedd.

Food Safety samples may need to be submitted to the Public Analyst, Public Health England or Public Health Wales, dependent on the type of examination or analysis required.

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 2013-2014. These were undertaken in collaboration with the North Wales Region and as solo bids from Flintshire. These accounted for approximately £8245 (including a co-ordinators fee) of further sampling work carried out by the Team and involved the use of the National Sampling Database, UK FSS-Net.

The Team Leader Food Safety and Food Standards is Secretary 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. As part of the WFMF the Team took part in a Cooked Ham Survey in retailers in addition to Sampling Surveys as part of the North

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

West Food Liaison Group.

This year, further focus will be given to the full introduction and implementation of the UK-Food Surveillance System (UK-FSS Net) to better target resources in respect of the Food Sampling for both Food Safety and Food Standards and by using the latest Internet-based version of the database.

Sampling Projects undertaken 2013-2014:

- Microbiological Quality of Cooked Ham
- Cheese Substitution
- Jam – sugar content
- Nut allergens in Catering
- Nut Allergens in Retail
- Meat Substitution in takeaways

Proposed Sampling Projects for 2014-15:

- Raw Mince Meat
- Meat Substitution
- Protected Geographical Indication (PGI) Survey for Welsh Lamb and Welsh Beef
- Unauthorised Health Claims
- 2,4–dinitrophenol Adulteration in Weight Loss Products
- Illicit Alcohol
- Adulterated Chicken

Sampling of Feeding stuffs will be undertaken as part of project work undertaken as part of the North Wales Trading Standards Collaboration (subject to approval of Grant funding bids made to the FSA). The regional bid is for approximately £28k and has been submitted for targeted sampling for such projects as testing for heavy metals in silage, presence of dioxins and mycotoxins in grain and other relevant sampling projects. In addition to proactive project work, samples will be taken where appropriate as part of incident/complaint investigation.

Investigation and control of outbreaks of food related infectious disease will be carried out in accordance with the Communicable Disease Outbreak Plan for Wales 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 year's trends, it is estimated that there will be approximately between 200 and 250 cases of sporadic notifications and between 0 and 10 outbreaks.

Campylobacter was the highest incidence of food-borne illness for 2013-2014 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 to 2015.

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. Sporadic notifications are expected to account for between 0.2 and 0.5 FTE post throughout the year.

3.7 Food Safety Incidents

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 2013/2014 which required considerable investigation work and enforcement action by the Team. These are detailed in Section 6.2.

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).
- Better Regulation Delivery Office (BRDO).

- Professional bodies such as the Chartered Institute for Environmental Health and Trading Standards Institute.
- Local Government Regulation, Public Health England, Public Health Wales, National Resources Wales, CEFAS, Animal Health and Veterinary Laboratories 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 Safety and Communicable Disease Task Group, in addition to the Food Hygiene Rating Steering Group (Refer to Section 5.1). The North Wales Quality and Metrology Panel for Trading Standards has been disbanded for a year as part of 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 Public Protection Service has been set up, so that prompt, appropriate advice may be given to ensure compliance with relevant legislation.

In terms of staff resources, this equates to approximately 0.25 FTE EHO post.

In addition to all of the above, liaison is also maintained between members of the Food Team by monthly Team Meetings and weekly Team Briefings. There is also a weekly Team Leader meeting for Team Leaders within Health Protection to keep up to date with any pertinent matters.

3.9 Food Safety & Food Standards Promotion

Educational and promotional activities are important components of a comprehensive Food Service. These are achieved in the following ways:

- This year's Food Safety Week theme is Do Not Wash Raw Chicken. Food Safety Week runs from 16th to 23rd June and is supported by the FSA. The core message for this year is for consumers to stop

- washing their raw meat at home.
- Setting up a display in Reception at County Hall on this year's Food Safety Week Theme – Don't Wash Your Chicken.
- Don't Wash Your Chicken initiatives – libraries, leisure centres, church groups / luncheon clubs.
- Stall at Mold Food Fair including advice on the new Food Information Regulations.
- Promoting the new Business Advisory Pack
- Continuation of the handwashing project in Flintshire schools, as part of the E. coli O157 Action Plan.

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 2014/2015 is detailed below in Table 1 and for Feed in Table 2.

Table 1 - Food

COST ITEM	FINANCIAL ALLOCATION
(a) Staffing (total staff costs)	£431,621
(b) Travel (lump sum and mileage) and Subsistence	£14,249
(c) Equipment (including investment in I.T.*)	£2,679
(d) Sampling	£3,539
(e) Shellfish Sampling	£9,001
(f) Training	£907

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

Table 2 - Feed

COST ITEM	FINANCIAL ALLOCATION
(a) Staffing (total staff costs based on 0.25 FTE AH&HP Team Leader)	£11,669.75
(b) Travel (lump sum and mileage) and Subsistence (estimate)	£1000.00
(c) Equipment (including investment in I.T.*) (estimate)	£250.00
(d) Sampling	£0.00
(e) Training (estimate)	£250.00

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 Animal Health Budget.

4.2 Staffing Allocation

The 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, 1.0 FTE Trading Standards Officer and 0.4 FTE Trading Standards Enforcement Officer. The Trading Standards Enforcement Officer has just been approved for Voluntary Redundancy and will be leaving the organisation at the end of September 2014. As detailed in Section 3.1.2 efforts have been made to mitigate the impact of loss of this 0.4 post by training 2 of the Food Safety Officers to be competent to undertake Food Standards work in food premises.

Of the above staffing allocation there are 2.9 Fixed Term contract EHOs whose contracts are due to expire at the end of September 2014. It is hoped that these posts will be filled permanently as a result of consideration of the detailed structures of Public Protection under the new senior management operating model. These posts are essential for effective service delivery and achievement of performance targets. One of the Food Safety Officer posts is also vacant due to the officer being seconded to a different area of Public Protection. However, arrangements are in place for temporary back filling of this post.

A limited amount of Food Standards inspection and sampling work is also carried out by Trading Standards Enforcement officers within other teams, up to the level of their qualification.

The Trading Standards Officer within the Food Team has carried out Weights and Measures inspections for the Compliance Team in Community Protection as the cover for a vacant post for a TSO in the Compliance Team.

Administrative support is currently provided by 1.0 FTE Administration Officer, pending the Corporate-wide Admin Review.

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). The two Food Safety Officers are also undertaking training to allow them to become competent to carry out Food Standards work.

All staff are authorised appropriately for the duties they perform. 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 Trading Standards Enforcement Officer holds the Diploma in Consumer Affairs including the Food and Agriculture paper.

If the requirements of the Food Law Code of Practice were to be fully met at this time, it is estimated that a further two officers at a minimum level of Food Safety Officer would be required on a short term basis. This would be for a maximum of one year until such time as all overdue low risk premises have been inspected. However, given the current budgetary constraints on the Authority, the service has instead developed a 3 year programme to meet this requirement from existing resources.

For Feed the current resource capacity is 0.25 FTE of the Team Leader post as the only post holder within this team currently fully competent to undertake all levels of Feed inspection. It is anticipated that this resource capacity will increase to include the 2 FTE Animal Health and Welfare officers once the revised Code of Practice is introduced in Wales (likely during 2014/15) which relaxes the competency

4.3 Staff Development Plan

criteria for inspection of medium and low risk premises. In order to fully meet the requirements of the Feed Law Code of Practice as it currently stands in Wales (i.e. the 2006 version) it is estimated that an additional Enforcement Officer competent to Level 2 would be required. However, once again this requirement will be met out of existing resources by way of a combination of an anticipated relaxation of the Feed Law code of Practice and proposed regional working.

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 set out in the Public Protection Learning and Development Plan 2014-2015.

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 specific Food Training Courses attended by staff during 2013-2014 include:

- Food Hygiene Rating Act
- Courtroom Skills / Statement Writing
- Food Sampling provided by Health Protection England
- Online Food Allergy Awareness
- Allergen Workshop
- Sous Vide
- Imported Food Control
- UK FSS Introduction
- Primary Authority Competency
- PGI Status Training

Attendance at the Lead Officer for Communicable Disease Training including:

- Lessons Learnt on Outbreaks
- Cryptosporidium

Training Planned for 2014-2015 includes:

- Enforcement Sanctions for EHOs and Food Safety Officers
- North Wales Consistency Training for Food Safety
- Food Standards training for Food Safety Officers
- Food Information Regulations Training for EHOs
- Weights & Measures Training for TSO
- In-house Cascade Training on external training attended
- Attendance at 6 pack training events for EHOs and Food Safety Officers

A full list of training required has been submitted to the All Wales Food Expert Panel as they provide the FSA with guidance on training programmes to be delivered on an All Wales basis.

Feed

The Team Leader – Animal Health and Health Promotion attended specialist training on Feedstuffs during 2013-2014. Training for Animal Health Enforcement Officers relating to changes to the Feed Law Code of Practice is planned for June 2014.

5.0 QUALITY ASSESSMENT

5.1 Quality Assessment

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.

Food Standards Procedures are also being written and reviewed to bring into line with Food Safety Procedures within the Team.

In addition, external audits including focused audits, are undertaken by the Food Standards Agency Wales on a periodical basis (every 3 years for full external audit). This is discussed in more detail in Section 6.2 as the Service received a full audit by the Food Standards Agency Wales in October / November 2013.

As previously stated, the Team Leader attends the North Wales Food 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.

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 National and Local Indicators and any key issues arising in each quarter. 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 2013-2014 Service Plan

As detailed in 3.0 the Food Service Team have performed to a very high standard achieving the target for all performance indicators. This was a notable achievement in a year where the new structure has not been fully implemented. The only exception to this was in the percentage of significant breaches resolved for Trading Standards which includes an element of Food Standards work. The figure achieved was 91% with a target of 97%. This is an improvement on the previous year's performance of 84%.

Appendix 3 provides full quantitative analysis of service delivery during 2013/14.

General achievements of note are listed below:

Achievements for 2013-14

- The whole Service was subject to a comprehensive

five day audit by the Food Standards Agency Wales in October 2013 as a result of which, it is very pleasing to report that FSA Wales identified several strengths of the Service, namely:-

- Documented policies and procedures for Food Hygiene and Food Standards
- Primary Authority Scheme and the Home Authority Principle
- Advice to businesses across the whole Food and Feed Service
- Control and Investigation of Outbreaks and Food Related Infectious Disease
- Internal Monitoring Arrangements for Food Hygiene and Food Standards
- Food Safety and Food Standards promotion

When published, the full report will be accessible on the FSA website via the following link :

<http://food.gov.uk/enforcement/auditandmonitoring/auditreports/auditwales/#.U-M1htRwbIU>

In addition the following further achievements are also worthy of note:-

Food Safety and Food Standards

- Achieved 100% of High Risk Food Safety and Food Standards inspections.
- Achieved 35.7% of D rated Food Safety Inspections and 39.4% of E rated Food Safety Inspections, in line with the plan to achieve one third of all D and E rated (low risk) premises inspections.
- Implementation of the Food Hygiene Rating (Wales) Act 2013 with a report going to Cabinet in January to set the Re-rating visit fee.
- Following on from the 2012-13 survey, a further survey was undertaken on Nut Allergens. Results from both the 2012 /13 and 2013 /14 surveys show that this is an issue in takeaway premises and resulted in a Simple Caution being given to a Flintshire takeaway. A second investigation led to a National recall on adulterated ground almond powder.
- The Team has successfully built on cross-agency

working with regards to the Dee Estuary including the use of a joint Registration Document/Catch Return between Flintshire County Council, Wirral Council and Natural Resources Wales, which is being issued by NRW on behalf of the two Local Authorities. Flintshire and NRW have carried out joint audits of these documents also involving Swansea Council. Flintshire now attends the All Wales Shellfish Liaison Group which has significantly improved communication and intelligence sharing between all Local Authorities and Agencies involved in Shellfish Enforcement within Wales.

- The Team were successful in bidding for approximately £8245 from both Food Standards Agency Wales and Food Standards Agency England for Food Standards Survey work. As part of the Protection Geographical Information Survey, Two Flintshire premises are now approved to supply Welsh Lamb and Welsh Beef.
- Delivered Chinese Food Hygiene Training and Food Safety Management System Training in the medium of Cantonese to approximately 100 food handlers across Flintshire and Wrexham, funded by FSA Wales.
- Improvement in Food Hygiene Ratings since 2010 e.g. the number of premises with a rating of 5 has increased from 35.3% in 2012 to 60.2% as of March 2014.
- Launching the new Food Safety Management System in Flintshire schools, for which the Food Team have acted as Critical Friend to Facilities Management.
- Alternative Enforcement Strategy implementation on approximately 50 food businesses. Following on from the success of this strategy, this approach will be rolled out in 2014-15 for all E rated premises for Food Safety and one third of all C rated premises for Food Standards (Cross reference to Section 6.3)

Feed

- A major review of the feeding stuffs premises register was undertaken involving a mailshot to around 800 businesses, with resultant updating of the premises register and advice and support being provided to business as appropriate.

6.3 Areas of Improvement
2014-2015

- All high risk feed establishments were inspected.

Areas requiring further development:

- Now that we have received the final report from the Food Standards Agency Wales following our audit in October 2013, a fully comprehensive Action Plan has been drawn up to address the recommendations made. This is attached to this Service Plan in full as Appendix 4 and covers all areas of the Food Service ie Food Safety, Food Standards and Feed.

Other areas of improvement include:-

Food Safety and Food Standards

- In 2013-14, a Food Safety and Food Standards Merger Action Plan had been written. Progress with this plan has been good but work needs to continue to ensure all areas identified in this plan are addressed.
- In preparation for the extension of the Food Hygiene Rating (Wales) Act 2013 to most food premises including trade to trade, further communications will have to be made with those businesses that will start to fall in to the legislation. As there is no legal mechanism to opt-in to the Act, we will also have to communicate with all businesses that now fall out of the scope of the Act to ask them to remove their sticker / certificates issued under the non-mandatory scheme.
- Installation and implementation of the latest version of the UK wide sampling database, UK FSS Net V9.
- Targeted promotional work on display of Food Hygiene Rating stickers. This work may lead to issuing of Fixed Penalty Notices. However, it is hoped that by using a graduated approach to enforcement, in line with the Enforcement Policy, that this will be minimised.

Feed

- Development of existing officer resource in Animal Health Enforcement Officers in order to deliver the feed service, subject to training and an anticipated relaxation of requirements under the FLECP.

- Improved service delivery through involvement in the North Wales Trading Standards collaboration projects aimed at improving and standardising local authorities approach to delivery of feed law enforcement and to feed sampling (the latter is dependent on grant funding from FSA Wales).

Food and Feed

- Mobile and Agile working – the teams have moved to Mobile and Agile Working in February 2014 as part of the Public Protection project. Whilst systems and processes have been devised, these need further work to optimise resources and to improve service delivery.
- Maximising use of Flare for reporting on outcomes e.g. to quantify improvements in Inspection Frequency Profiles of all food businesses.

6.4 Forthcoming Considerations

There are several considerations which may influence or impact on Service Delivery for 2014/15. These are detailed below:-

Whole service considerations

- Work is ongoing to move to the delivery of Trading Standards on a Regional basis across Wales. The North Wales region has opted for a model called Collaboration Plus, the detail of which is still being developed. Therefore the effect of this on the level of service currently delivered by Flintshire County Council for Food Standards and Feed is not yet known. However, there will be a requirement from the Food Standards Agency Wales that the level of service is maintained in accordance with the Food Law Code of Practice and Framework Agreement, to which Flintshire County Council will be accountable.
- The Collaboration Plus approach is being rolled out for Environmental Health and Licensing Service Areas, with an initial identification of projects already having been carried out. The full extent of this collaboration is not yet designed but is due to developed over 2014-15.

Food Safety and Food Standards

- The transition period between the current non-

mandatory Food Hygiene Rating Scheme and the mandatory display introduced by The Food Hygiene Rating (Wales) Act 2013 expires on 28th May 2015. We have 114 premises that were inspected under the non-mandatory scheme but are not due their next routine food hygiene inspection until after the transition period ends. We are developing a strategy for dealing with these premises, for which grant funding of up to £5,000 is available from Welsh Government.

- Requests for rescores for Food Hygiene Ratings have dropped considerably since the re-rating visit became chargeable. For comparison, in 2013-14, we received 67 requests for re-rating visits – 60 of these were received before the new legislation came in to force in November 2013. It is hoped that once we start more survey and enforcement work on non-display, the requests for rescores may increase. Additionally, since April 2014, we have already received 8 applications, for which there is a £150 fee. It is therefore hoped the reduction in requests since November 2013, was a temporary issue.
- The Food Sampling Budget is set at £3539. The budget currently allocated for Food Sampling was enhanced last year by successful bids for around £8245 of grant funding. Consideration of the budget provision for Food Sampling is required as there is a greater emphasis on Food Sampling as a consequence of concerns raised on Food Adulteration and Authenticity raised by the Horsemeat incident and other Food Alerts.
- The EU Food Information for Consumers Regulations will be enforced using the Food Information (Wales) Regulations 2014, which introduce:
 - changes to current rules on allergen labelling for pre-packed foods
 - the introduction of a new requirement to provide allergen information for businesses that provide non-pre-packed foods (e.g. restaurants, take away businesses, bakeries, delicatessens, food suppliers and caterers).

This legislation comes in to force as of 13th December 2014, with further requirements of FIC coming in by 2016.

- A new Food Law Code of Practice for Food Standards is due in Summer 2015. However, consultation will begin this financial year. This is alongside the National Trading Standards Board Intelligence Operating Model, which is being proposed to be used across all areas of Trading Standards, including Food Standards. This Model places less emphasis on inspection but places reliance on the management and analysis of intelligence to target resources and types of intervention undertaken.
- The Service Plan relies on the current level of staffing to be maintained. Several posts within the Service are currently filled as Fixed Term contracts, pending the outcome of structural considerations following the introduction of the new senior management operating model. These posts will need to remain filled for the whole of 2014/15 for the commitments made in this Service Plan to be delivered.

Feed

- Following the FSA Audit of Food and Feed undertaken in October 2013 a review of feed delivery has been undertaken that has identified a need for a significant increase in work in this area along with a significant increase in committing existing resources to achieve the standards demanded by the FSA.
- Trading Standards across Wales have recognised the need for improvement in the delivery of feed enforcement and as such have been engaged over the last year in a number of collaborative pieces of work to improve the delivery of this function. FCC are involved as part of the North Wales Trading Standards collaboration in developing such an approach which it is planned will start to deliver improved results across North Wales during the year 2014/15. In addition an All-Wales Working Group for Feed are developing a suite of documented procedures to be used by all 22 LA's in delivering feed enforcement and advice to ensure consistency of approach in delivering this function.
- Further to help with improved feed delivery, based on the anticipated introduction of a new FLECP in Wales during 2014 (already implemented in England (May 2014)) and the relaxation of the legal requirements governing qualification of officers to conduct feed enforcement and inspection work under the FLECP it



is proposed to utilise the resource of the Animal Health Enforcement Officers of the service to undertake some limited feed work. Joint WHoTS/FSA Feed training specifically to enable this was programmed in June 2014.

Chart 1

» Final Portfolios: 5 Service, 2 Corporate, 2 Transformation and a Chief Executive

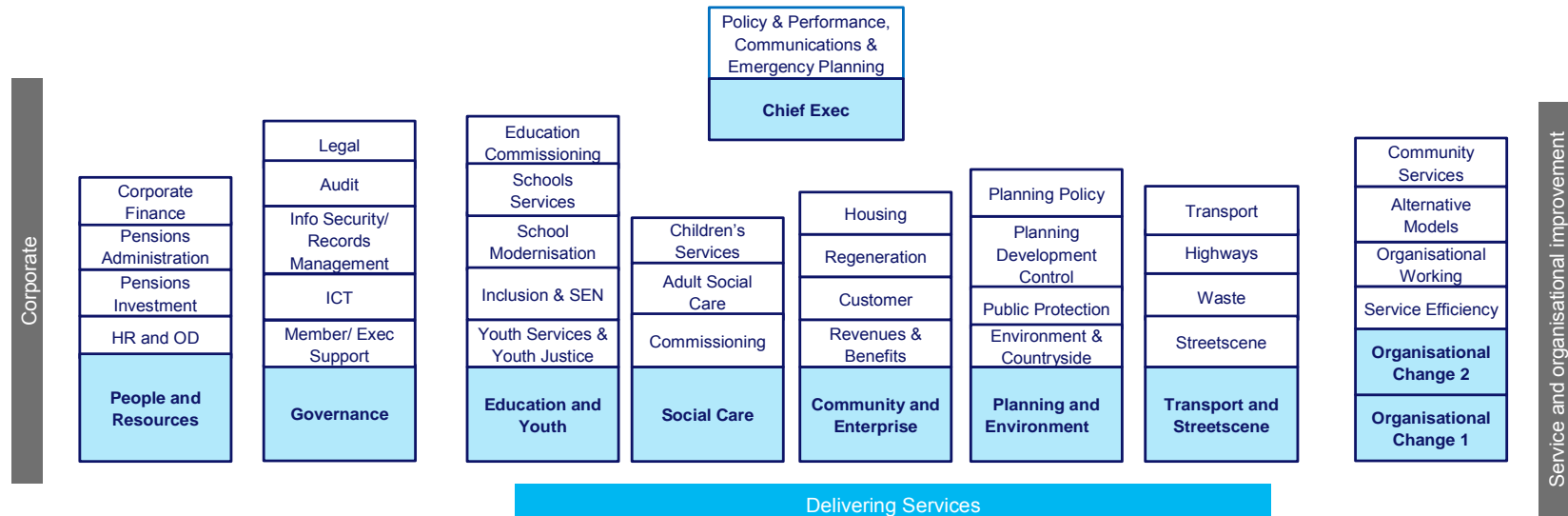


Chart 2

FLINTSHIRE COUNTY COUNCIL – POLITICAL STRUCTURE

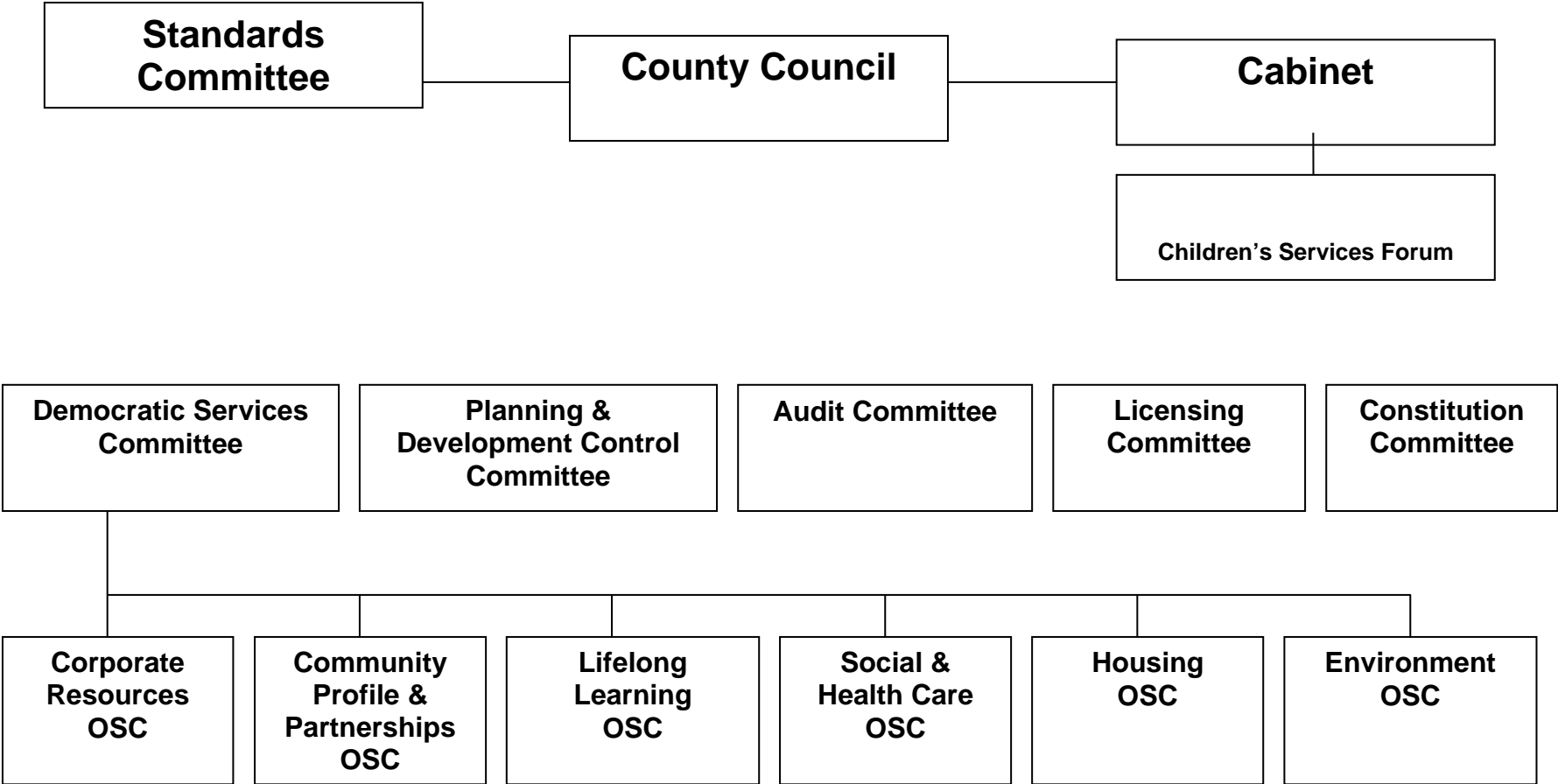
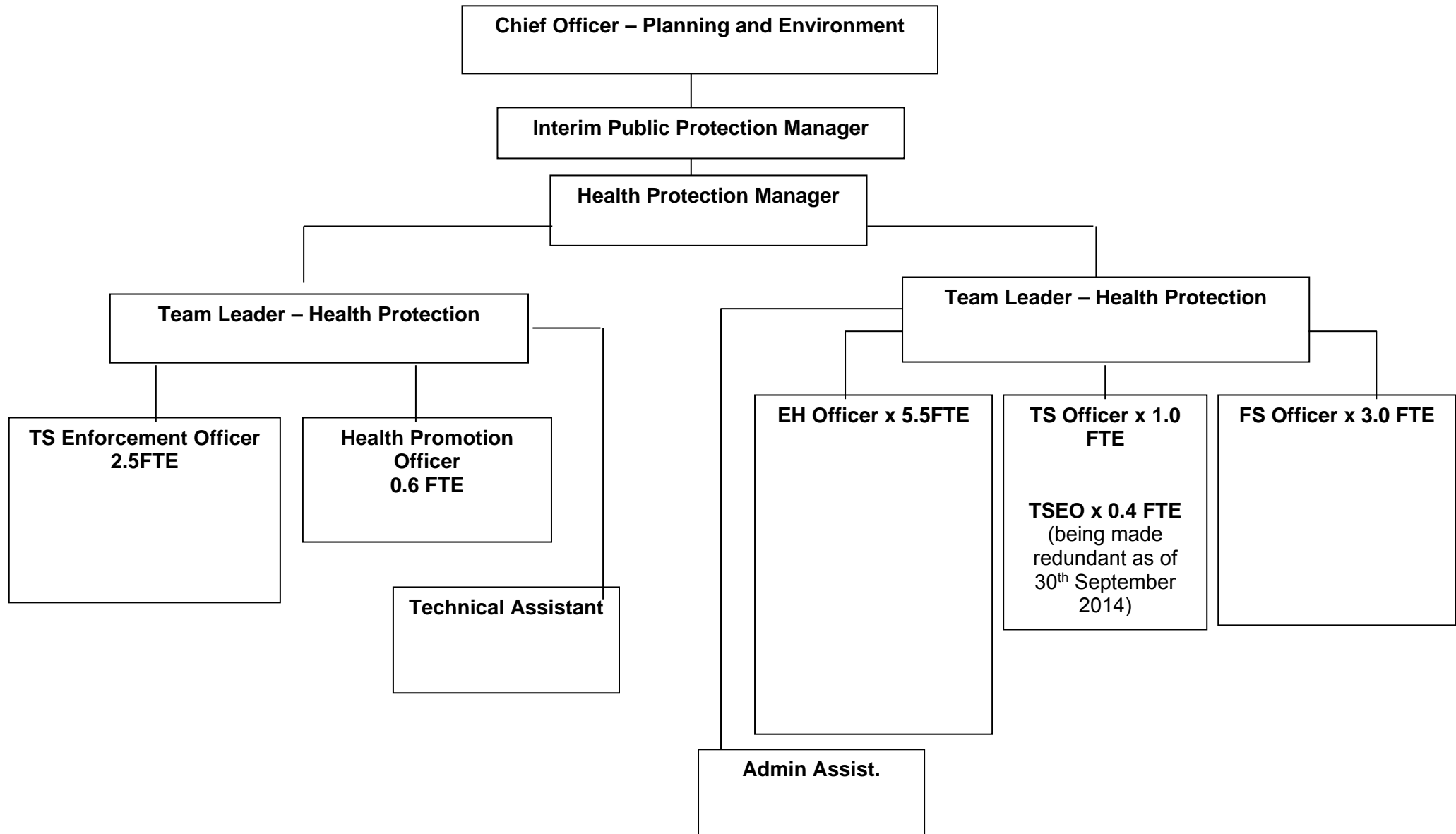


Chart 3

PUBLIC PROTECTION - FOOD SERVICE



APPENDIX 2

Please find below a breakdown of the profile of programmed Food Safety and Food Standards inspections for 2014/2015 by Risk Rating:

Table A

PROGRAMMED INSPECTIONS - FOOD SAFETY	
Risk	Number Due
A	4
B	48
C	369
D	174
E	259 (AES)
Unrated	82
TOTAL	936

Table B

PROGRAMMED INSPECTIONS - FOOD STANDARDS	
Risk	Number Due
A	11
B	329
C	431 (To achieve 1/3 as AES)
Unrated	52
TOTAL	823

Table C

PROGRAMMED INSPECTIONS - FEED	
Risk	Number Due
A	1
B	2
C	3
Unrated	100
TOTAL	106

The Risk Rating is determined in accordance with the Food or Feed Law Code of Practice. It dictates the frequency at which the food/feed premises must receive a full food hygiene, food standards or feed inspection. For Food Safety High Risk premises are those with a Risk Rating of A, B and C. For Food Standards and Feed High Risk premises are those with a Risk Rating of A.

APPENDIX 3 – PERFORMANCE 2013-14

Food Safety

Risk	Programmed	Achieved
A) High Risk	4	100%
B) High Risk	64	100%
C) High Risk	332	100%
D Low Risk	210	35.7%
E Low Risk	149 (out of a total of 382 tagged)	39.4%
TOTAL	759	

TOTAL Number of Interventions Undertaken (including Revisits)	1037
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Food Standards

Risk	Programmed	Achieved
High	10	100%
Medium	325	29.5%
TOTAL	335	

Feed Service

Risk	Programmed	Achieved
High	1	100%
Medium	5	80%
Low	3	66.6%
TOTAL	9	

National Food Hygiene Rating Scheme

Profile of Ratings within Flintshire: March 2013 (from Food Standards Agency Wales figures)

	5	4	3	2	1	0
	Very Good	Good	Generally Satisfactory	Improvement Necessary	Major Improvement Necessary	Urgent Improvement Necessary
% of Premises	60.3	21.7	10.4	4.4	3.1	0.1

Number of Requests for Rescore Visit to be Undertaken - 67

Number of Appeals on Rating - 5 – None were upheld

Other data in relation to Demands on Food Service

Food and Feeding Stuffs Complaints

Food Safety number of complaints - 90

Food Standards number of complaints - 13

Feed Service number of complaints - 0

Advice to Business and Consumers

Food Safety - 223 requests for advice

Food Standards - 94 requests for advice

Feed Service - 103 requests for advice

Food and Feeding Stuffs Inspection and Sampling

Food Safety - 95 samples – statutory and monitoring

Food Standards - 63 samples – monitoring

Feed - 0 samples

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

Sporadic Notifications	-	204
Outbreaks	-	3 none found to be food-related

Other Types of Service Requests (Food Safety only)

<u>Water Disconnections</u>	-	30
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<u>Shellfish Requests for Registration Documents</u>	-	these are now administered by Natural Resources Wales on our behalf
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<u>Ship Sanitation</u>	-	7
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<u>Export Certificates</u>	-	None
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APPENDIX 4

**Action Plan for Flintshire County Council
Audit Date: 28 October - 1 November 2013**

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.18(i) Ensure future Food and Feed Service Plans are developed in accordance with the Service Planning Guidance in the Framework Agreement. More comprehensive information on the authority's feed service should be provided together with a robust analysis of the resources required to deliver the food and feed services against those available. [The Standard – 3.1]</p>	<p>September 2014</p>	<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 resources required to fully deliver the food service against those available.</p> <p><u>Feed</u></p> <p>This recommendation relates to the level of information provided about the feed service in general but with</p>	<p>The Service Plan for 2014-15 has been written in draft being pending the receipt of our final audit report. It is due to go to Cabinet in September 2014. All the planned improvements are being incorporated in to this document.</p> <p>The Service Plan for 2014/15 includes considerably more comprehensive information regarding FCC Feed Service and includes all the planned</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
		<p>particular regard to :-</p> <p>a) Lack of information detailing the resources required to deliver the range of official feed controls required to fully meet the requirements of the Feed Law Enforcement Code of Practice.</p> <p>b) Lack of information detailing the cost of providing the feed service</p> <p>c) Lack of information detailing the internal monitoring arrangements of the feed service.</p> <p>Planned improvements include a detailed analysis of resources needed against those actually available. This will have regard to the impact of 'earned recognition' which is being introduced in the revised Feed Law Code of Practice, which is anticipated to be introduced in Wales in the near future, and the collaborative North Wales Feed service workplan agreed by North Wales heads of Trading Standards (NWHoTS).</p>	<p>improvements identified.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.18(ii) Address any variance in meeting the feed service delivery plan in subsequent service plans. [The Standard-3.3]	Completed	A detailed review of 2013/14 feed law service delivery will be undertaken against the targets set in the 2013/14 Service Plan. Any variances will be addressed in the 2014/15 Service Plan.	Review has been undertaken and variances addressed in the 2014/15 Service plan.
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]	Completed	<u>Food Hygiene/Food Standards/Feed</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.
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]	Completed	<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. <u>Feed</u> Copies of all training records and qualifications will be held on officer's personal file.	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. All records collated and held centrally for feed officers.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
6.11(i) Review, amend and implement the documented procedure for maintenance and calibration. [The Standard - 6.2]	Completed	<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 calibration of temperature probes. Although this was cited on the record forms it was not included in the written procedure.	The procedure has been reviewed and has been amended to include specific reference to the tolerance of 0.5°C in the written 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]	Completed	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	Officers have been told in a minuted formal meeting that they are to inspect in date order of inspections due. Quarterly inspection lists have been provided with list in date order of next inspection due. We already have an interventions analysis spreadsheet where officers have to complete a text box if they are over the 28 day period to give a reason why the inspection is overdue.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
		database.	
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. [The Standard -7.2]	a.) and b.) As of April 2014 and on-going through 2014/15. c.) End of March 2016.	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. b.) D rated inspections due this year are to be done within 28 days of being due. 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.	FCC has implemented an Alternative Enforcement Strategy since the audit was undertaken, where all premises overdue an inspection that would fall outside the scope of the Food Hygiene Rating Act or may not qualify as a food business were sent an AES questionnaire in March 2014. Approximately 50 food businesses have responded. The remaining 120 premises are to be contacted by telephone to carry out the questionnaire using the telephone.
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]	Completed	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. 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.	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.
<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	End of March 2017.	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	Officers have been told in a minuted formal meeting that they are to inspect in date order of inspections due. Quarterly inspection lists have been provided

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<p>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>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></p> <p>There is a back log of premises that are overdue their food standards inspection.</p>	<p>with list in date order of next inspection due. We already have an interventions analysis spreadsheet where officers have to complete a text box if they are over the 28 day period to give a reason why the inspection is overdue.</p> <p>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>The Team Leader is assigning inspection lists to the TSO and TSEO in line with how work is allocated for Food Hygiene.</p> <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 bought together in to the same office</p>

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			which is assisting in communication, monitoring of work being undertaken and aligning work culture and processes.
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]	Completed	<u>Food Standards</u> This recommendation relates to announced Food Standards inspections taking place but the reason for the visit being announced, (rather than unannounced) not being recorded.	Inspections are to be unannounced, unless there is valid, documented reason for the visit to be announced.
7.34 (iii) Set up, maintain and implement a documented food standards revisit procedure. [The Standard 7.4]	Completed	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.
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]	August 2014	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.
<u>Feedingstuffs</u>	End of March	Following the review of the feed	Work is ongoing as part of the

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7.50 (i) Ensure that feed establishment interventions and inspections are carried out at the frequency specified by the Feed Law Enforcement Code of Practice. [The Standard - 7.1]	2017.	<p>premises database in 2013 accuracy has improved. This is an ongoing exercise.</p> <p>The need to improve accuracy across all six North Wales LA's has been identified as one of the three priorities across North Wales and is the focus of collaborative working planned for the delivery of the feed function across North Wales during 2014/15.</p> <p>Due to the number of premises involved that are currently unrated a plan to inspect around 100 premises a year on top of those identified already as medium or high risk has been agreed. This plan will run in Flintshire for a period of three years, on completion of which all premises will be correctly risk assessed based on inspection. This plan will ensure that issues regarding inclusion of all regulated premises, correct assessment of risk and inspection frequency of premises are in accordance with the FLECP.</p>	<p>NWHoTS collaboration to provide a joined up approach utilising what expertise there is in this field across the region as part of a number of projects to improve compliance.</p> <p>A plan has been agreed in Flintshire to target an additional 100 premises that are currently unrated for feed during the period 2014/15, this is part of a three year plan targeting 100 currently unrated premises each year. This plan is currently in the early stages of implementation and will be expanded following training of AHO's in feed and an expected change to the qualification requirements for officers as a result of a new FLECP later in 2014.</p>
7.50 (ii) Carry out inspections / interventions and approve or register feed establishments in accordance with relevant legislation and the Feed Law Enforcement Code of Practice and centrally issued guidance. [The	April 2015 for High risk and ongoing to end of March 2017 for lower risk/unrated.	Premises database is constantly being updated with new businesses being added, and existing business details revised where found necessary as a result of inspection work undertaken. Planned	All high risk premises inspected prior to 31 st March 2014 with database amended as necessary to reflect actual current risk.

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Standard - 7.2]		inspection of all high risk premises is planned during the year and a percentage of medium risk and currently unrated premises.	
7.50 (iii) Set up, maintain and implement documented procedures for AES and revisits and revise the feed inspections procedure relating to use of appropriate inspection forms and risk rating. [The Standard – 7.4]	Jan 2015	Procedures re alternative interventions and revisits are to be developed and documented for feed. Premises inspection procedure to be amended regarding use of appropriate forms and risk rating of premises activity.	Work on feed procedures to ensure consistency and uniformity across Wales is currently being undertaken on behalf of all 22 local authorities by a WHoTS working group in conjunction with FSA Wales. Target date for delivery is currently late 2014. FCC advised by FSA to await this rather than develop own procedures.
7.50 (iv) Record observations and data obtained from interventions in a timely manner to prevent its loss and ensure contemporaneous records are legible and retrievable. [The Standard – 7.5]	Ongoing	This is being done and is utilising FSA inspection forms and timely data inputting on to the database along with current physical storage of documents and planned future use of the EDMS system for electronic storage of documents.	Accurate recording by officers of data obtained using standard forms, with data inputting being carried out as soon as practical after inspections. This being monitored by team leader.
8.12 (i) Review and update the documented procedure to provide comprehensive guidance for officers on investigating feed complaints. [The Standard – 8.1]	Ongoing	Guidance procedure for officers regarding investigation of feed complaints to be further developed and updated in line with centrally produced guidance.	As per 7.50(iii) above.
8.12 (ii) Investigate complaints	Completed	In light of the auditors view that the	The Team Leader has gone

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received in accordance with the Food Law Code of Practice, centrally issued guidance and its own policy and procedures. [The Standard – 8.2]		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 complaint should not be investigated will be set out.	<p>through each complaint as part of the internal monitoring procedure already in place prior to the audit. They are happy with all actions taken by the investigating officer except in one instance where the Team Leader had already identified this to the officer concerned. This was recorded on the complaint file which the auditor saw.</p> <p>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 deviation on the complaint file and this deviation can be justified on public health grounds.</p>
11.7 (i) Carry out a review of the feed database to ensure its accuracy. [The Standard – 11.1]	October 2014	The majority of the work necessary to ensure accuracy of the database has now been done. However, some further work is necessary regarding accuracy of risk ratings. This is being done as part of FCC's own action plan and as part of a NWHoTS action plan that identifies this as an area for improvement as one of its three priorities to improve feed service delivery across North Wales.	Prior to the FSA audit all relevant premises were contacted to review their current feed activities and to reassess risk. The Feed premises database has been updated based on this. This work has continued following the audit and in response to FSA recommendations made at the time, and has included a further review of registered feed premises to ensure accuracy. Premises currently unrated are included in a three year plan to ensure accuracy of assessed risk.

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12.12(i) Set up, maintain and implement a documented feed sampling programme having regard to any centrally issued or relevant guidance and the relevant Code of Practice, [The Standard - 12.4]	Pending	<p>There is currently no available budget to undertake a feed sampling programme within the budget of the AH&HP team. However, Flintshire are part of an NWHoTS bid for funding made in March 2014 to FSA Wales (outcome still pending (July 2014). This forms part of the two feed service delivery projects proposed by NWHoTS as collaborative approach to improving feed service delivery across North Wales. Sampling of Feed is one of NWHoTS three priorities for improvement in feed service delivery for 2014/15.</p> <p>Delivery of a sampling programme will be subject to receipt of grant funding from FSA Wales through NWHoTS, and the level will be dependent on how much grant is received. Otherwise any sampling to be undertaken would be dependent on FCC making funding available.</p>	Flintshire are currently awaiting the outcome of an NWHoTS bid made in March 2014 to FSA Wales for funding in support of a North Wales wide intelligence led feed sampling programme for 2014/15. The aim of this approach is to target any identifiable problem areas with the limited resource available to achieve maximum effect.
12.12(ii) Review, update where necessary, maintain and implement the documented sampling procedures in respect of the procurement and preservation of samples (food), continuity of evidence (feed) in accordance with the relevant Codes of Practice and centrally issued guidance. [The Standard - 12.5]	August 2014	<p><u>Food</u></p> <p>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.</p>	The Food Hygiene Sampling Procedure is currently being amended to include this additional safeguard.

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		<p>The Food Sampling Policy already sets out the information on procurement of samples.</p> <p><u>Feed</u></p> <p>Review of sampling procedure to be conducted considering all points raised by FSA.</p>	<p>Reference to the preservation of the chain of evidence in the form of sample security sealing has been incorporated into our feed sampling procedure.</p> <p>More generally work on feed procedures to ensure consistency and uniformity across Wales is currently being undertaken on behalf of all 22 local authorities by a WHoTS working group in conjunction with FSA Wales. Target date for delivery is currently late 2014.</p> <p>FCC advised by FSA to await this rather than develop own procedures.</p>
<p>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. [The Standard – 14.1]</p>	<p>August 2014</p>	<p>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.</p>	<p>Procedure in process of being reviewed.</p>
<p>15.14 (i) Ensure that food hygiene law enforcement is carried out in accordance with the Food Law Code of</p>	<p>Completed</p>	<p>a) The team are to attend Enforcement Sanctions training in May 2014.</p>	<p>Review has been undertaken of detailed points raised by the FSA audit and corrective measures put</p>

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Practice, centrally issued guidance and the authority's own documented procedures. [The Standard -15.2 & 15.3]		b) Explanations to always be recorded on premises file when procedure has been deviated from.	in place where necessary.
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]	Completed	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.
<u>Food Hygiene</u> 16.7(i) Record, with reasons any deviations from set procedures. [The Standard – 16.1]	Completed	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 being sent out later will be recorded on file.	The Team Leader had already introduced a system for identifying when reports are being sent out to ensure that reports were 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.
<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	By end of March 2015	This recommendation relates to: 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	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.

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<p>officer, details of action taken where non-compliance was identified, details of any enforcement action taken, and relevant food registration information. [The Standard -16.1]</p>		<p>giving a breakdown of legal contraventions and what was only recommendation.</p> <p>d.) The report of inspection form did not have all the information on it that it is supposed to have.</p> <p>Improvements:-</p> <p>a.) Merge premises files between Food Hygiene and Food Standards.</p> <p>b.) Database records to be comprehensive by scanning 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>Prior to the audit, documented instruction had been given to ensure 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>
<u>Feed</u>	Ongoing	These records now exist for all work	All feed work undertaken

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16.18(i) Maintain up to date, accurate records in a retrievable form on all relevant feed establishments and imported feed in accordance with the Feed Law Enforcement Code of Practice and centrally issued guidance. These records should include reports of all interventions / inspections, the determination of compliance with legal requirements made by the officer and details of action taken. [The Standard – 16.1]		completed since the FSA audit. However, recognise this needs to be maintained fully.	incorporates use of FSA inspection forms, use of a manual filing system for paper records, and updating of the feed premise database to record all work conducted.
16.18(ii) Ensure records and intervention / inspection reports are kept for at least 6 years. [The Standard - 16.2]	Completed	This is now being done	This is being done.
19.16(i) Implement the documented internal monitoring procedures for feed and maintain records of internal monitoring for at least two years. [The Standard – 19.1 and 19.3]	Completed.	This is now being done	This is being done.