



# FOOD SERVICE

## SERVICE PLAN

2015-2016



# FLINTSHIRE COUNTY COUNCIL FOOD SERVICE PLAN 2015-16

## INTRODUCTION

The Service Plan relates to the year commencing 1st April 2015 and ending 31st March 2016.

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 2015-16**

**CONTENTS** **Page No.**

<b>1.0</b>	<b>SERVICE AIMS AND OBJECTIVES</b>	
	1.1 Aims and Objectives	1
	1.2 Links to Corporate Objectives and Plans	1-3
<b>2.0</b>	<b>BACKGROUND</b>	
	2.1 Authority Profile	3
	2.2 Organisational Structure	3-4
	2.3 Scope of the Food Service	4-5
	2.4 Demands on the Food Service	6-8
	2.5 Enforcement Policy	8
<b>3.0</b>	<b>SERVICE DELIVERY</b>	
	3.1 Food Premises Inspections	8-10
	3.1.1 Additional Targeted Inspection/Enforcement Activity	10-11
	3.1.2 Resources for Inspections and Additional Enforcement Activity	11
	3.2 Food Complaints	11-12
	3.3 Primary Authority Principle	12-13
	3.4 Advice to Business	13-14
	3.5 Food Inspection and Sampling	14-17
	3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease	17-18
	3.7 Food Safety Incidents	18
	3.8 Liaison with Other Organisations	19-20
	3.9 Food Safety & Food Standards Promotion	20-21
<b>4.0</b>	<b>RESOURCES</b>	
	4.1 Financial Allocation	21-22
	4.2 Staffing Allocation	23-24
	4.3 Staff Development Plan	24-25
<b>5.0</b>	<b>QUALITY ASSESSMENT</b>	
	5.1 Quality Assessment	25-26
<b>6.0</b>	<b>REVIEW PROCESS</b>	
	6.1 Review against Service Plan	26-27
	6.2 Review of Performance Against 2014/2015 Service Plan	27-28
	6.3 Areas of Improvement 2015/2016	28-29
	6.4 Forthcoming Considerations	29-32
	<b>APPENDIX 1</b>	
	Organisational Charts for the Service	
	Chart 1 – Organisation Structure of Flintshire County Council	33
	Chart 2 – The Cabinet Structure of Flintshire County Council	34
	Chart 3 – The Organisational Structure of the Food Team and the Health Protection Service in which it sits	35
	<b>APPENDIX 2</b>	
	Profile of Programmed Inspections 2015-16	36-37
	<b>APPENDIX 3</b>	
	Performance 2014-2015	38-40
	<b>APPENDIX 4</b>	
	Update on FSA Action Plan	41-60

## 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 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 Plan has direct links with the County Priorities and Improvement Plan 2012 – 2017. The Plan sets out the full list of the Council's eight priorities for the period 2012- 2017. Each year, sub-priorities are chosen which will receive significant attention over a particular year and where we will make a bigger impact.

Previously, the Food Service sat within the Environment Directorate. This changed last year due to the restructuring of the Council and the Service now sits in the Planning and Environment Portfolio. An overarching Service Plan is due to be written for the Planning and Environment Portfolio for this year.

Each Service area within Public 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.

The Food Service links with 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 Performance Accountability Measures and Service Improvement Data. A Corporate Performance Management System termed CAMMS, monitors performance of all services within the Council and these are reported quarterly. 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 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 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 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

## 2.3 Scope of the Food Service

Protection, which is overseen by the Health 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 England, Public Health Wales and Public Analyst Scientific Services as the Public Analyst (See Section 3.5).

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:

- 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 component of the service has the following responsibilities and service provision:

- Undertake a pre-planned programme of visits to feed premises within Flintshire.
- Provide advice, information and support to feed businesses.
- Investigation of complaints relating to feedstuffs and sampling of feed as when required.

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 1416 food premises in Flintshire. Of the total number of food premises in Flintshire approximately 988 are caterers, with the remainder being made up predominantly by 327 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 51 food manufacturing and packing businesses within Flintshire, 10 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 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 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 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

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 28<sup>th</sup> November 2014, the Act also applies to businesses that operate trade to trade.

### 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	12 months	16	High	A	6 months	2
				B	12 months	34
Medium	2 years	418		C	18 months	449
Low	5 years	661	Low	D	2 years	283
				E	3 years	561
OUTSIDE		17		OUTSIDE		25
UNRATED		304		UNRATED		62
<b>TOTAL</b>		<b>1415</b>		<b>TOTAL</b>		<b>1415</b>

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.

The premises profile for Feed is as follows:

FEEDINGSTUFFS		
Risk	Min.	No. of
High	1 year	1
Medium	2 years	11
Low	5 years	25
Unrated *		
*Majority likely to be low risk		329
<b>TOTAL</b>		<b>366</b>

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.

## 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 Performance Accountability Measure detailed in the Local Government Performance Improvement Framework 2015-16 and a number of Service Improvement Data relating to all 3 areas of the Service for 2015/2016 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.

#### Food Safety and Food Standards

The performance of the Food Safety and Food Standards Team in 2014/2015 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. The Food Standards New Business target of 75% was also exceeded by achieving 82%. This took considerable efforts from the Team.

There is a Public Accountability Measure in place, namely the percentage of businesses which are Broadly Compliant with Food Hygiene legislation. For 2014-15, this figure has improved from 85.7% to 95.6% of food businesses within Flintshire falling into this category.

For D rated Food Hygiene inspections, a figure of 66.5% of inspections was achieved and a total of 100% of E rated premises inspections achieved. The figure for the E rated premises is better than the D rated as these were carried out by way of the Alternative Enforcement Strategy which allowed the inspections to be carried out by completion of a telephone questionnaire. (These premises will have to be given a full visit at the time of their next inspection as per the Food Law Code of Practice).

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.
- To inspect all D Rated premises for Food Hygiene to receive a full food hygiene inspection.
- To use the Alternative Enforcement Strategy on all eligible E Rated premises for Food Safety.
- To use the AES on 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 2015-2016 in relation to their Risk Rating is given in Appendix 2. This shows totals of 513 full inspections for Food Hygiene with a further 185 premises being subject to an Alternative Enforcement Intervention and 362 full inspections for Food Standard with a further 100 being subject to an Alternative Enforcement Intervention. The Alternative Enforcement Interventions for Food Standards account for half of those to be done by the end of March 2017.

### Feed

There are 366 registered feed premises in Flintshire. Of the total number of feed premises in Flintshire 307 are registered as farms (Livestock or arable), 20 as feed manufacturing and packing businesses and 30 businesses registered for the supply of surplus food. The remainder of the registered premises are engaged in storage (2), transportation (4) or distribution (3) of feed. 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.

#### 3.1.1 Additional Targeted Inspection/ Enforcement Activity

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

- 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.
- 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 focus on effectiveness and efficacy of cleaning procedures in 0 – 2 rated premises. This bid is being submitted jointly with all 6 North Wales Local Authorities as part of the North Wales Environmental Health and Licensing Collaboration Plus Project.
- Assessing non-compliance with the Food Hygiene Rating (Wales) Act 2013, in regard to mandatory

display of food hygiene ratings stickers and taking any enforcement action, as necessary.

### 3.1.2 Resources for Inspections and Additional Enforcement Activity

#### Food Safety and Food Standards

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, 5.5 FTE EHOs and 2 FTE Food Safety Officers who have completed their Food Standards module. The remaining 1.0 FTE Food Safety Officer is due to be return to their post as of 1<sup>st</sup> October 2015. This officer will not be undertaking Food Standards work until they have achieved the additional qualification required.

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

All aspects of feed work will be carried out by 0.4 FTE Team Leader –Animal Health and Health Promotion and 0.1 Enforcement Officer. During 2014/15 FSA Wales have undertaken a review of feed service delivery across Wales. This has included publication of a revised Feed Law Enforcement Code of Practice for Wales in late 2014 and significant changes made by FSA Wales regarding both the funding and delivery of feed regulation across Wales. This has resulted in the FSA funded North Wales Feed Service Delivery Plan 2015/16.

### 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 70 and 100 excluding Primary Authority referrals. This equates to 1 FTE (EHO or FSO) and 0.25 FTE of a TSO involved in such investigations.

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

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 feeding stuffs complaints for the forthcoming year is anticipated to be between 0 and 5.

### 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 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.

### Feed

There is currently no Primary Authority relationship between FCC and any Flintshire based Feed Business Operator.

## 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. 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 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 and is to be available on the Flintshire County



### 3.5 Food Inspection and Sampling

Council website.

For Food Standards, it is anticipated the resource required for Advice to Business is going to remain high due to the new legislation governing Food Labelling and Food Standards which came 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 further advisory work in October and November to assist businesses in becoming compliant, particularly in regards to Allergen information in food premises that provide non-pre-packed foods specifically such as restaurants, takeaways and delicatessens.

#### Feed

Flintshire is committed to supporting feed businesses and working with them to enable compliance with all regulatory and best practice 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 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 given to businesses requesting guidance either by telephone, e-mail or post.

It is anticipated that the launch of the North Wales Feed Service Delivery Plan will lead 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. 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 2014-2015. These were undertaken in collaboration with the North Wales Region and as individual bids from Flintshire. The regional grant amounted to approximately £24,750 in total across the region, which generated £2,250 of co-ordinating fee for Flintshire. Inclusive of the individual bids for grant funding

and the co-ordinators fee, £10,140 of additional monies was given to the Authority by FSA Wales and FSA London. All of this further sampling work carried out by the Team involved the use of the National Sampling Database, UK FSS-Net.

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 Net) 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 2015-16.

Sampling Projects undertaken during 2014-2015 included:

- Nut allergens in Catering
- Nut Allergens in Retail
- Meat Substitution in takeaways
- Illicit alcohol
- Nut adulteration in spices
- Unauthorised colours in sauces and seasonings in takeaways
- Fish speciation
- Fat / Connective Tissue / Protein ratio in raw mince meat
- Microbiological study on swabs of unusual serving platters
- Microbiological study on swabs of food preparation boards and cleaning cloths in use in food businesses

Proposed Sampling Projects for 2015-16 are predominantly as part of the North Wales Trading Standards Collaboration Plus Project. These include:

- Meat Substitution\*
- Nut allergens in takeaway meals\*
- Peanut allergens in pre-packed ground almonds
- 'Free from' declaration in relation to allergens\*
- Presence of Acrylamide in fried food\*
- Unauthorised use of colours and seasonings in Takeaways\*
- Unauthorised Nutrition and Health Claims

Denbighshire County Council are taking the lead this year and have allocated the surveys out such that Flintshire are taking samples in relation to those with an asterisk\*

For Food Safety, there will be statutory sampling at approved premises and taking part in regional WFMF and Public Health England Surveys to include:

- Quality of raw drinking milk
- Continuation of Unusual Serving Platters
- Continuation of Swabs of food preparation boards and cleaning cloths
- Filled pastry products in hot holding cabinets
- Microbiological survey of premise with a low food hygiene rating

#### Feed

Sampling of Feeding stuffs during 2015/16 will be undertaken as part of the FSA funded North Wales Feed Service Delivery Plan (part of the North Wales Trading Standards Collaboration). FSA Wales have currently prioritised entry points to Wales for feed including sea and airports as being where sampling should take place. This has resulted in no funding initially coming to North Wales rather it has been focused on South and West Wales. However, this may be subject to change later in 2015/16 if priorities are changed. Unless such a change (supported by funding) occurs Flintshire will not be in a position to take any feed samples other than in response to complaints or feed safety incidents.

#### 3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

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 2014-2015 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. Sporadic notifications are expected to account for between 0.2 and 0.5 FTE post throughout the year.

### 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 2014-15 which required considerable investigation work and enforcement action by the Team. These are detailed in Section 6.2.

#### Feed

Alerts will be initiated and responded to in accordance with the Feed Law Enforcement 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 extent of feed or businesses that are affected.

### 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 of Environmental Health and Chartered 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 Technical 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. The North Wales Quality and Metrology Panel for Trading Standards has continued to be 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.

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 Board (NTSB) 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 Animal Health and Health Promotion Team through monthly team meetings, and 1:1's. There is also a weekly Team Leader meeting for Team Leaders within the area of Health Protection and Trading Standards to keep up to date with any pertinent matters.

### 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:

- Mold Food Fair
- Food and Hospitality Conference
- Joint Allergen Workshops with Wrexham CBC and FSA Wales where 140 food handlers from both areas attended training on the new legislative requirements.
- Mailshot to all businesses selling loose foods to inform them of the new legislative requirements and to invite them to Allergen Workshops held in Flint. This resulted in 120 Flintshire based Food Handlers attending these workshops.
- Delivered training to all School Cooks on Allergens by running 3 workshops.
- Acted as Critical Friend to Client Catering in developing their Allergen Information Control Systems

Promotional work programmed for this year includes:

- This year's Food Safety Week theme is The Chicken Challenge. Food Safety Week has been brought forward this year and is running week commencing 25<sup>th</sup> May and is supported by the FSA. The core message for this year is for consumers to pledge to improve their food hygiene practices at home in relation to handling chicken in order to reduce the incidence of Campylobacter.
- Presentation to the Clwydian Range Food Trail at their Annual General Meeting in regards to food hygiene ratings. The Food Trail is a consortium of local producers and hospitality businesses who are encouraging the use of local produce in their sector and promote the area locally and nationally.
- Further Allergen workshops to businesses in October and November. This is detailed further in Section 6.3.

#### Feed

Promotion work is done as part of routine inspection or in response to enquiries made by business to the service. During 2015 Flintshire published a Business Pack that provided advice and guidance for proposed, new and expanding businesses. This publication (available in both hard copy and electronically) includes information on feed and sign posts businesses to reliable sources of feed compliance information including FSA Wales.

## 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 2015/2015 is detailed below in Table 1.



**Table 1: Budget for the Food Safety and Food Standards Team**

<b>COST ITEM</b>	<b>FINANCIAL ALLOCATION</b>
(a) Staffing (total staff costs)	£461,073
(b) Travel (lump sum and mileage) and Subsistence	£21,955
(c) Equipment (including investment in I.T.*)	£1,300
(d) Sampling	£3,539
(e) Shellfish Sampling	£9000
(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 shows the overall level of expenditure for Feed Service delivery:

**Table 2: Budget for the Feed Service Delivery 2015/16**

<b>COST ITEM</b>	<b>FINANCIAL ALLOCATION</b>
(a) Staffing (total staff costs )	£18379.80
(b) Travel (lump sum and mileage) and Subsistence	£1500.00
(c) Equipment (including investment in I.T.*)	£500.00
(d) Sampling	No current budget but funding may be available from FSA Wales later in 2015/16.
(e) Training	£300.00
(f) Total	£20679.80

\* 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 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 now permanent.

One of the Food Safety Officers is currently back-filling as Health Promotion Officer as a 1.0 FTE post until the end of September 2015. This is to enable effective promotion of the Public Protection Service and also to deliver the Healthy Schools Project on behalf of Lifelong Learning by way of Service Level Agreement.

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). 2 of the Food Safety Officers also hold the Food Standards Module. They are currently working towards the Food Identification Module which will enable them to be awarded the Higher Certificate in Food Control.

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.

In line with the Food Standards Agency Wales requirement to include within the service plan an estimate of the number of Full Time Equivalents we would require to deliver the Food Law Code of Practice in its entirety, we would require 2 additional Food Safety Officers holding the Higher Certificate in Food Control for one year. However, we have taken the approach to delivery to bring all overdue actions up to date over a 3 year period.

## Feed

All aspects of Feed work will be carried out by two officers of the service. These are 0.4 FTE Team Leader –Animal Health and Health Promotion and 0.1FTE Trading Standards Enforcement Officer

The Team Leader satisfies all criteria as a qualified officer, this includes holding the Diploma in Trading Standards (DTS), successful completion of the five day QMS Auditor/Lead Auditor Training Course, completion of CIEH accredited HACCP training, and participation in an FSA Wales programme of feed training in conjunction with their training provider Campden BRI. Such qualification means that the Team Leader is suitably qualified and will therefore undertake all aspects of feed work, while the Trading Standards Enforcement Officer satisfies the competency criteria based on experience and training that enables them to perform limited feed work on farms specifically on R13 registered (Livestock) farms and R14 registered (Arable) farms.

### 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 2015-2016.

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 2014-2015 include:

- Food Information Regulations and Food Information for Consumers

- North Wales Consistency Training
- Enforcement Sanctions
- Investigative Interviewing
- Annual Food Safety Conference
- Food Standards Module for the Higher Certificate in Food Control for Food Safety Officers
- Food Crime

The Team Leader also attended a 2 day course ran internally on Managing a Mobile and Agile Work Force.

Attendance at the Lead Officer for Communicable Disease Training included a day on Giardia and the Use and Abuse of Epidemiological Data.

Training planned for 2015-2016 includes:

- Approved Premises
- Regional Consistency Training
- Food Information Regulations Improvement Notices
- Food Identification Module for the Food Safety Officers
- Dairy Processing

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.

Feed - Both the Team Leader – Animal Health and Health Promotion and the Animal Health Enforcement Officer have attended specialist training on Feedstuffs during 2013-2015, and will continue to undertake ongoing training as part of CPD for feed during 2015/16.

## 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.

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.

#### 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 on a periodical basis (every 3 years for full external audit). The Service received a full audit by the Food Standards Agency Wales in October/November 2013.

## **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 2014-2015 Service Plan

As detailed in 3.0 the Food Service Team have performed to a very high standard achieving the target for all Service Improvement Data.

Appendix 3 provides full quantitative analysis of service delivery during 2014/15.

### Food Safety and Food Standards

General achievements of note are listed below:

- Achieved 100% of High Risk Food Safety and Food Standards inspections.
- Achieved 66.5% of D rated Food Safety Inspections and 100% of E rated Food Safety Inspections. Please note – during the year it was necessary to revise our programme of E rated food hygiene inspections to be delivered by the Alternative Enforcement Strategy.
- Successful prosecution of a restaurant for non-compliance with the Food Safety Act 1990 in relation to the mis-description of food containing peanut, for which we received written praise from FSA Wales.
- Delivered Turkish Food Hygiene Training and Food Safety Management System Training in the medium to approximately 30 food handlers across Flintshire and Wrexham as a collaboration project between the 2 local authorities, which was 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 68.6% as of April 2015, with 95.2% of businesses within the scope of the Act having a rating of 3 or higher. The Welsh national average is 58.6% of businesses having a rating of 5 and 93.9% of food premises having a rating of 3 or above. This shows the positive impact of the scheme and the mandatory display of ratings.
- The team was awarded £5000 of grant monies from Welsh Government to carry out additional enforcement work to assess compliance with the Food Hygiene Rating (Wales) Act 2013. The team visited approximately 350 food premises by area to check whether the food hygiene rating sticker was being displayed. Admin Support also telephoned approximately 90 takeaways and public houses which

serve meals to check whether they were verbally told the correct food hygiene rating.

### Feed

Achievements for 2014/15:-

- FCC worked 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.
- Two North Wales Feed Sampling projects were undertaken during 2014/15. The first for presence of heavy metals in feed and the second for presence of dioxins in feed. All samples taken in Flintshire were found to be satisfactory.

## 6.3 Areas of Improvement 2015-2016

### **Areas Requiring Further Development:**

#### Food Safety and Food Standards

A significant amount of work has been done in the last financial year to address the overdue Medium Risk Food Standards inspections. This work needs to continue in this coming year, particularly as there has been new legislation introduced as of December 2014.

The Alternative Enforcement Strategy for Low Risk premises for Food Standards needs to be fully implemented for those premises which the Code of Practice allows to receive an intervention in this way.

There has been significant work undertaken on the database in relation to Food Standards as the database was not accurate for identifying premises that had not received a Food Standards inspection. Now this work has been completed, the team are able to prioritise those businesses which are Unrated and are to receive their first Food Standards inspection. It is planned to inspect all such premises within a 3 year period.

The FSA audit in 2013 highlighted that some inspections were not being done within 28 days of being due, which is contrary to the Food Law Code of Practice. The compliance

with this requirement is now being monitored on a monthly basis. Any reasons for not adhering to this requirement are to be recorded so these can be fully audited.

### Feed

- As part of the North Wales Feed Enforcement Delivery Plan Flintshire will increase the level of feed interventions as per the requirements of the Feed Law Enforcement Code of Practice (FLECP) in all aspects of feed related business conducted at premises across Flintshire from manufacturing to storage and haulage and through to final on-farm consumption of feed by livestock.
- To continue to improve and further develop feed premises records systems and to improve recording of all feed enforcement and advice work including improved use and provision of written inspection reports to business.
- Continue to develop and implement a documented Alternative Enforcement Strategy (AES) for use with low risk premises and premises that have 'earned recognition'.
- Amend existing documented procedures for Feed in line with the documents that have been produced by WHoTS/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.

There are several considerations which may influence or impact on Service Delivery for 2015/16. These are detailed below:

### Food Safety and Food Standards

The intended closure of the Dee Estuary for commercial cockle gathering by Natural Resources Wales for the whole year may have a significant impact on service delivery as this amounts to a considerable loss in earnings for licensed gatherers. The lack of daily activity by them on the estuary may lead to non-licensed gatherers attempting to take cockle illegally.

## 6.4 Forthcoming Considerations



The Service Plan relies on the current level of staffing to be maintained and the 1.0 FTE Food Safety Officer post being filled as of October 2015. These posts will need to remain filled for the whole of 2015/16 for the commitments made for Service Delivery in to 2015 and beyond in order for the Service Plan to be delivered.

The Food Standards Agency Wales wrote a report for the Welsh Government titled 'Review of the operation and implementation of the Statutory Food Hygiene Rating Scheme in Wales and the Operation of the Appeals System' in February 2015. This report is required to be written by way of legislation on an annual basis. The report made several recommendations including:

- Local authorities should continue to engage in consistency training exercises with the assistance of the FSA.
- Local authorities and the FSA should further promote and support food business operators to make use of the "right to reply" facility.
- Local authorities should ensure that all businesses are aware of the requirement to display the statutory sticker even when the rating remains unchanged from the non-statutory scheme.
- Local Authorities should ensure that businesses are informed and aware of the need to remove previously issued non-statutory stickers.
- Local authorities should consider further ways of monitoring the display of stickers, and use a proportionate enforcement approach to ensure that businesses, particularly those rated 0, 1 and 2, display their statutory stickers.

The Food Law Code of Practice Wales is currently out for consultation and it contains significant changes to the qualifications assessment for officers undertaking food law enforcement duties. The consultation is due to end mid June 2015 and it due to be implemented as of April 2016. However, some of the proposed changes will start to impact in this financial year as officers will need to undergo further training to be deemed competent to carry out their duties as of 1<sup>st</sup> April 2016.

We are hoping to run more Allergen Workshops on the new requirements of Food Standards legislation in 2015-16 for those businesses that have not attended to date.

Follow up work on non-display of Food Hygiene Ratings including issuing of Fixed Penalty Notices, when appropriate, needs to be undertaken.

### Feed

- Following the FSA Audit of Food and Feeding stuffs undertaken in November 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 resources to achieve the standards demanded by the FSA.
- During 2014/15 FSA Wales have conducted a major review of the delivery of Feed Regulation delivery across Wales. This has resulted in a new approach to feed being taken with the function now being delivered on a regional basis across 6 regions across Wales. This has seen the appointment of a lead feed authority for North Wales in the form of Wrexham CBC while each of the six North Wales LA's (including Flintshire) has a lead officer for feed. In Flintshire this is the Team Leader for Animal Health and Health Promotion.
- The delivery of feed regulation in Flintshire is to be done as part of the North Wales Feed Service Delivery Plan. The plan involves FSA Wales tasking each local authority to do a number of inspections based on risk profile and in exchange FSA Wales will pay Flintshire on a per premise basis for work that is completed. Flintshire have been tasked with a total of 74 inspections for the year. Fees payable by FSA Wales are dependent on the type of premise and range from £100 per premise for low risk farms through to £550 per premise for High Risk Manufacturers. If all 74 visits are completed the maximum that can be reclaimed from FSA Wales would be £16990.00 for the year.
- However, in addition to this there may be a requirement by the FSA for some feed sampling work to be undertaken as part of national or regional projects. FSA Wales have stated that there priority for 2015/16 with regard to feed sampling is focused on ports of entry. Therefore, initially this work will be

focussed on the sea ports of South and West Wales with no current plans for sampling projects to be conducted in the North. Where such sampling is required by the FSA they have what they term a 'fighting fund' that will cover the costs of any work undertaken by LA's.

- Beyond 2015/16 the continued maintenance and development of feed service delivery within Flintshire is dependent on continued funding from FSA Wales. Hopefully, if Flintshire and our partners across North Wales achieve the targets set this year for us by FSA Wales, this funding will be maintained to enable the feed service to improve and maintain standards across the feed and farming industries of Flintshire.

#### **Point of Special Note**

Following the FSA audit in 2013, the Service is due to receive a follow up audit to assess progress with the audit action plan. This takes 2 days and involves an element of re-auditing elements looked at during the initial 5 day audit. We do not have any anticipated dates from them as yet. A review of our progress to date is given in Appendix 4.

Chart 1

# FLINTSHIRE COUNTY COUNCIL - ORGANISATIONAL STRUCTURE

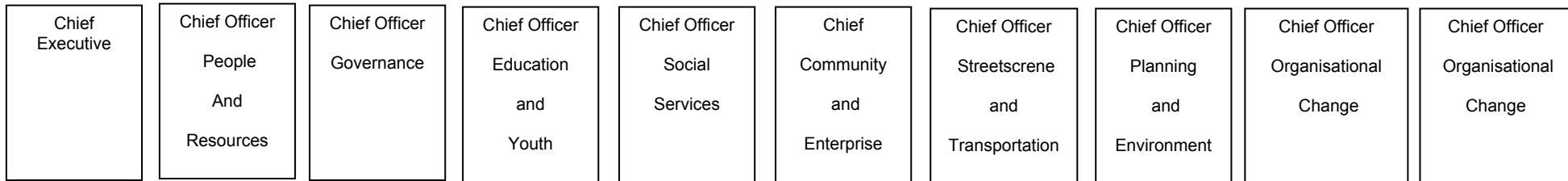


Chart 2

# FLINTSHIRE COUNTY COUNCIL – POLITICAL STRUCTURE

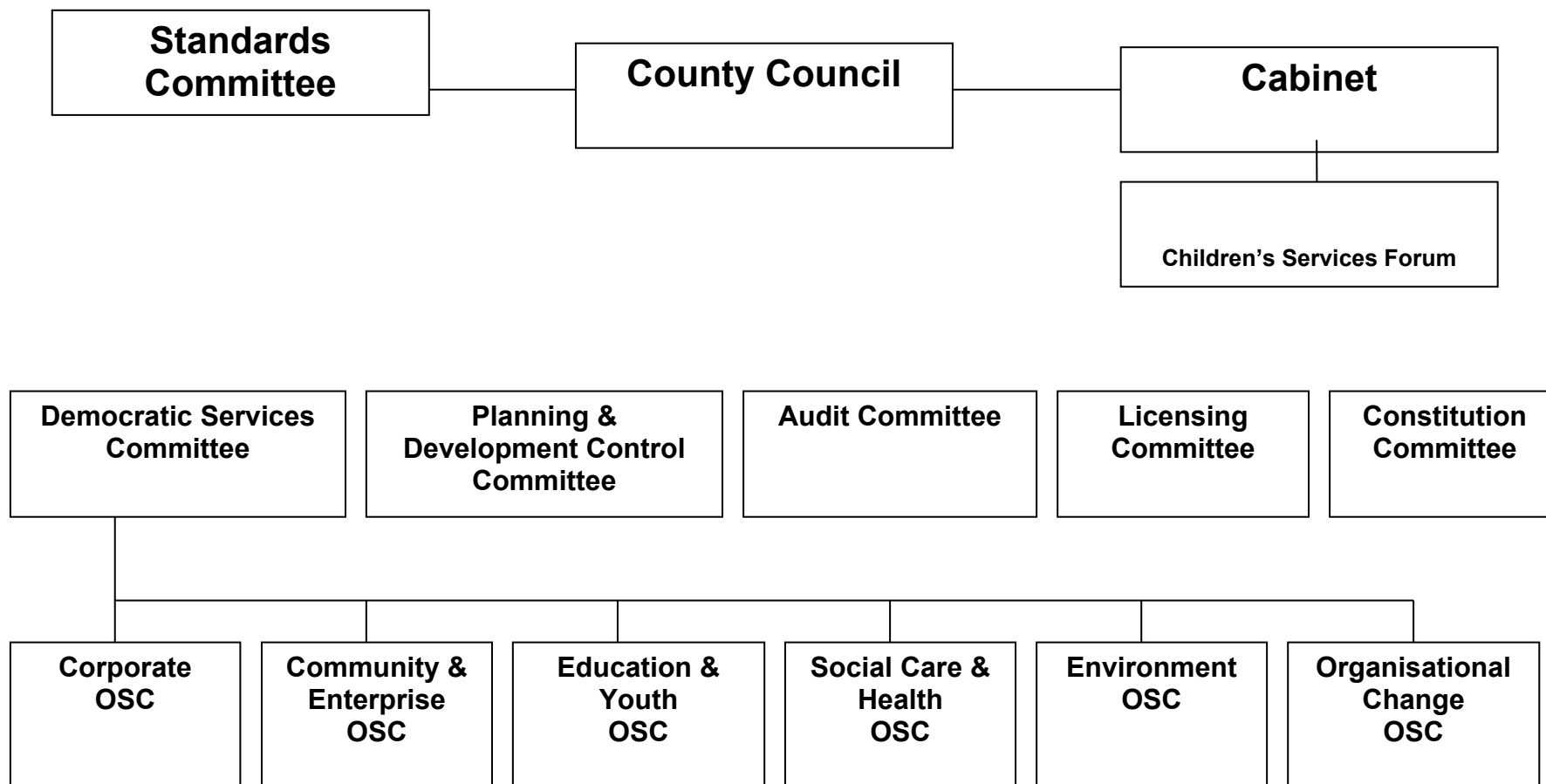
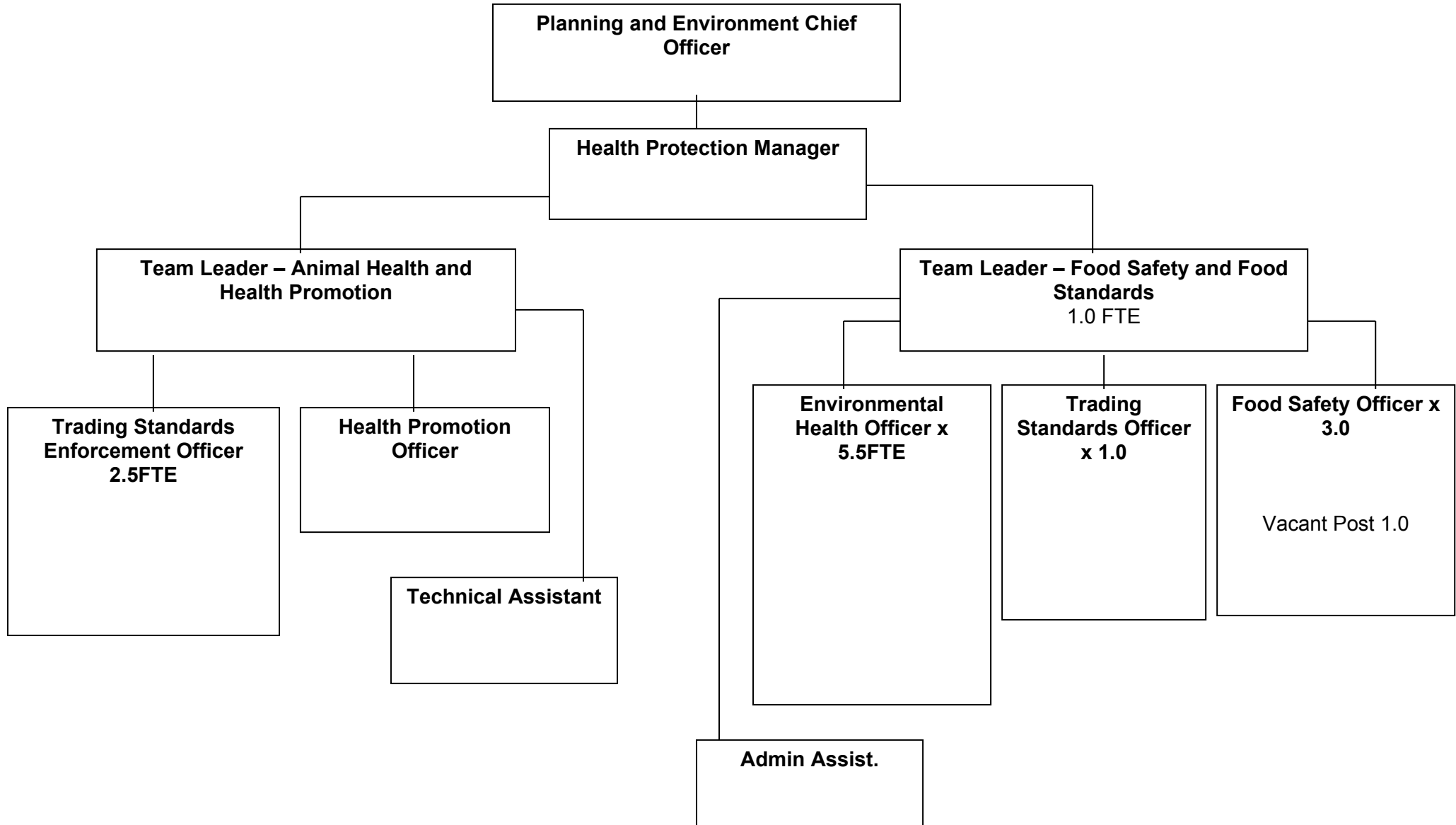


Chart 3

# PUBLIC PROTECTION - FOOD SERVICE



## APPENDIX 2

Please find below a breakdown of the profile of programmed Food Safety and Food Standards inspections for 2015/2016 by Risk Rating:

**Table A**

<b>PROGRAMMED INSPECTIONS - FOOD SAFETY</b>	
<b>Risk</b>	<b>Number Due</b>
A	2
B	34
C	266
D	146
E	185 by AES 18 by inspection
Unrated	47
<b>TOTAL</b>	<b>698</b>

**Table B**

<b>PROGRAMMED INSPECTIONS - FOOD STANDARDS</b>	
<b>Risk</b>	<b>Number Due</b>
A	17
B	245
C	120 by AES
Unrated	100
<b>TOTAL</b>	<b>482</b>

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, B and 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 2015/2016 by Feed Business Activity:

**Table C**

<b>PROGRAMMED INSPECTIONS - FEED</b>	
<b>Registered/Approved Feed Business Activity</b>	<b>Number Due</b>
Manufacturer of Feed	7
Co Product Producers	4
Feed Stores	2
Feed Distributor	1
Feed Transporter	1
On Farm Feed Mixers	7
Supplier of Surplus Food	30
Livestock Farms	20
Arable Farms	2
<b>Total</b>	<b>74</b>

The type (by feed activity) and number of feed premises to be inspected during 2015/16 by Flintshire has been determined by FSA Wales as part of a new approach to the delivery of feed enforcement across Wales. This forms part of year one of the recently launched (April 2015) FSA Wales funded North Wales Feed Enforcement Delivery Plan (a collaborative approach across the six North Wales Local Authorities working with FSA Wales).



## APPENDIX 3 – PERFORMANCE 2014-15

### Food Safety

Risk	Programmed	Achieved
A ) High Risk	2	100%
B ) High Risk	49	100%
C ) High Risk	368	100%
D Low Risk	173	66.5%
E Low Risk	129	100%
<b>TOTAL</b>	<b>721</b>	<b>660</b>

<b>TOTAL</b> Number of Interventions Undertaken (including Revisits)	<b>771</b>
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### Food Standards

Risk	Programmed	Achieved
High	11	100%
Medium	327	50.5% in line with achieving 100% by March 2017.
<b>TOTAL</b>	<b>338</b>	

<b>TOTAL</b> Number of Interventions Undertaken (including Revisits)	<b>452</b>
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## Feed

<b>Risk</b>	<b>Programmed</b>	<b>Achieved</b>
High	1	100%
Unrated	100	6
<b>TOTAL</b>	<b>101</b>	<b>7</b>

## **Food Hygiene Ratings**

### Profile of Ratings within Flintshire: April 2015

	<b>5</b>	<b>4</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>0</b>
	Very Good	Good	Generally Satisfactory	Improvement Necessary	Major Improvement Necessary	Urgent Improvement Necessary
% of Premises	68.6	21.2	5.3	2.8	2.0	0.1

Number of Requests for Rescore Visit to be undertaken - 24

Number of Appeals on Rating - 0

### **Other data in relation to Demands on Food Service**

#### Food and Feeding Stuffs Complaints

Food Safety number of complaints - 77

Food Standards number of complaints - 7

Feed number of complaints - 1

Advice to Business

Food Safety	-	174 requests for advice 96% responded to within 10 working days
Food Standards	-	21 requests for advice 95% responded to within 10 working days
Feed	-	6 requests for advice

Food and Feeding Stuffs Inspection and Sampling

Food Safety	-	62	samples – statutory and monitoring
Food Standards	-	83	samples – monitoring of which 21 were Unsatisfactory
Feed	-	5	samples – monitoring (for dioxins and heavy metals) – all were satisfactory.

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

Sporadic Notifications	-	238	of which 170 were Campylobacter
Outbreaks	-	5	none found to be food-related

Other Types of Service Requests (Food Safety only)

<u>Water Disconnections</u>	-	2	
<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>	-	4	

**APPENDIX 4**

**Update on FSA Action Plan for Flintshire County Council - 2015**

**Audit Date: 28 October - 1 November 2013**

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE (June 2014)	UPDATE ON ACTION PLAN PROGRESS (as at June 2015)
<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>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>Achieved and incorporated into this years' Service Plan.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE (June 2014)	UPDATE ON ACTION PLAN PROGRESS (as at June 2015)
		<p><u>Feed</u> This recommendation relates to the level of information provided about the feed service in general but with 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</p>	<p>The Service Plan for 2014/15 includes considerably more comprehensive information regarding FCC Feed Service and includes all the planned improvements identified.</p>	<p>Service Plan for 2015/16 includes considerably more comprehensive information regarding the FCC Feed Service Plan which now forms part of the North Wales Feed Service Delivery Plan for 2015/6</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE (June 2014)	UPDATE ON ACTION PLAN PROGRESS (as at June 2015)
		North Wales Feed service workplan agreed by North Wales heads of Trading Standards (NWHoTS).		
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.	NFA
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.	NFA
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.	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	NFA A reminder has been sent out to the Team.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE (June 2014)	UPDATE ON ACTION PLAN PROGRESS (as at June 2015)
		<p><u>Feed</u></p> <p>Copies of all training records and qualifications will be held on officer's personal file.</p>	<p>written in the register.</p> <p>All records collated and held centrally for feed officers.</p>	
6.11(i) Review, amend and implement the documented procedure for maintenance and calibration. [The Standard - 6.2]	Completed	<p><u>Food Hygiene</u></p> <p>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.</p>	<p>The procedure has been reviewed and has been amended to include specific reference to the tolerance of 0.5°C in the written procedure</p>	NFA
<p><u>Food Hygiene</u></p> <p>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]</p>	Completed	<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, although they have been done within the annual programme in which they were due.</p>	<p>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</p>	NFA

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		<p>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.</p>	<p>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>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]</p>	<p>(a) and (b) As of April 2014 and on-going through 2014/15.</p> <p>(c) End of March 2016.</p>	<p>(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.</p> <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>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</p>	<p>(a) Achieved 66.5% of these, due to a period of time with a staff vacancy. Aim to achieve 100% in 2015-16.</p> <p>(b) Some slippage but the officers have been reminded of the need to carry out the inspections within 28 days.</p> <p>(c) On track to be completed by end of March 2016.</p>



TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE (June 2014)	UPDATE ON ACTION PLAN PROGRESS (as at June 2015)
			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.	FSA have provided examples of Good Practice. Reminder given in Team Meetings. Further training to be held in Quarter 2
Food Standards 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	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.	On track.

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<p>Food Law Code of Practice and assess the compliance of establishments and systems to the legally prescribed standards. [The Standard -7.1 &amp; 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>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.</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</p>	<p>On track to complete by end of March 2017.</p> <p>Medium Risk – up-to-date by end of 2016.</p> <p>Developed AES for Food Standards</p> <p>Done and reported for 2015/16</p>

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			<p>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 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>Done</p> <p>Done</p>
7.34(ii) Carry out interventions/inspections and register establishments in	Completed	<u>Food Standards</u>  This recommendation relates to	Inspections are to be	NFA

<b>TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)</b>	<b>BY (DATE)</b>	<b>PLANNED IMPROVEMENTS</b>	<b>ACTION TAKEN TO DATE (June 2014)</b>	<b>UPDATE ON ACTION PLAN PROGRESS (as at June 2015)</b>
accordance with the relevant legislation, Codes of Practice, and centrally issued guidance. [The Standard -7.2]		announced Food Standards inspections taking place but the reason for the visit being announced, (rather than unannounced) not being recorded.	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.	NFA
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.	Aide memoir has been introduced for Food Standards inspections.
<u>Feedingstuffs</u> 7.50 (i) Ensure that feed establishment interventions and	End of March 2017.	Following the review of the feed premises database in 2013 accuracy has improved. This is an	Work is ongoing as part of the NWHoTS collaboration to	An FSA funded North Wales Feed Service Delivery

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<p>inspections are carried out at the frequency specified by the Feed Law Enforcement Code of Practice. [The Standard - 7.1]</p>		<p>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>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>	<p>Plan is now in place. The Lead Authority for this is Wrexham CBC with the Team Leader Animal Health and Health Promotion being Lead Feed Officer for Flintshire.</p> <p>A revised plan has now superseded the original plan. This has been based on direction given by FSA Wales following the introduction of the regional service model. This involves a limited number of officers (1 x Enforcement Officer and 1 x Team Leader) conducting a total of 74 inspections of feed premises during 2015/16. The officers involved comply with the relevant Code of Practice requirements as well</p>

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				as additional requirements imposed by FSA Wales to accommodate demands made by the FVO on previous visits to Wales.
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 Standard - 7.2]	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 inspection of all high risk premises is planned during the year and a percentage of medium risk and currently unrated premises.	All high risk premises inspected prior to 31 <sup>st</sup> March 2014 with database amended as necessary to reflect actual current risk.	All high risk premises inspected prior to 31 <sup>st</sup> March 2015 with database amended as necessary to reflect actual current risk.
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	WHoTS/FSA work on production of feed procedures is now complete and FCC are in the process of amending systems to comply with these changes with completion planned by August 2015.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE (June 2014)	UPDATE ON ACTION PLAN PROGRESS (as at June 2015)
			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.	Ongoing.
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.	As per 7.50(iii) above.
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]	Completed	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	The Team Leader has gone 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	NFA

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE (June 2014)	UPDATE ON ACTION PLAN PROGRESS (as at June 2015)
		complaint. A clear policy on when a complaint should not be investigated will be set out.	<p>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	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	The previously referred to Three Year Plan to address unrated premises has now been superseded by the requirements of the 2015/16 North Wales



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		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.	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.	Feed Service Delivery Plan. During 2015/16 this will involve a total of 74 premises being inspected rather than the original figure of 100. This revision has been approved by FSA Wales under the 2015/16 FSA Wales Funded Plan.
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	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	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	During 2014/15 Flintshire secured FSA Wales funding via two North Wales Collaboration Projects for feed sampling and samples were taken for presence of heavy metals and dioxins.  Under the FSA Wales funded North Wales Feed Service

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		<p>priorities for improvement in feed service delivery for 2014/15. 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>	<p>available to achieve maximum effect.</p>	<p>Delivery Plan there is currently no planned Sampling Work for 2015/16. The focus of sampling feed across Wales for 2015/16 is on Points of Entry to Wales and is therefore focused on the South and West Wales Sea Ports. However, FSA Wales have stated this may be subject to review and therefore sampling projects may be identified and undertaken later on in the year.</p>
<p>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]</p>	<p>August 2014</p>	<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>	<p>The Food Hygiene Sampling Procedure is currently being amended to include this additional safeguard.</p>	<p>Done</p>

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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. 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. FCC advised by FSA to await this rather than develop own procedures.</p>	<p>Please see the above note at 7.50 (iii) regarding feed procedures.</p>

<b>TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)</b>	<b>BY (DATE)</b>	<b>PLANNED IMPROVEMENTS</b>	<b>ACTION TAKEN TO DATE (June 2014)</b>	<b>UPDATE ON ACTION PLAN PROGRESS (as at June 2015)</b>
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]	August 2014	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.	Procedure in process of being reviewed.	Up-to-date contact details for out-of-hours have now been shared with FSA, while procedure is being amended as per 7.50 (iii) above.
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]	Completed	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.	NFA
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.	NFA
<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.	The Team Leader had already introduced a system for identifying when reports are being sent out to ensure	NFA

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE (June 2014)	UPDATE ON ACTION PLAN PROGRESS (as at June 2015)
		In future deviations on the reports being sent out later will be recorded on file.	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.	
<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 non-compliance was identified, details of any enforcement action taken, and relevant food registration information. [The Standard -16.1]</p>	By end of March 2015	<p>This recommendation relates to:</p> <ul style="list-style-type: none"> <li>a.) Paper-based premises files not being available for all premises in relation to Food Standards.</li> <li>b.) The database records not being comprehensive.</li> <li>c.) Inspection report forms not giving a breakdown of legal contraventions and what was only recommendation.</li> <li>d.) The report of inspection form did not have all the information on it that it is supposed to have.</li> </ul> <p>Improvements:-</p> <ul style="list-style-type: none"> <li>a.) Merge premises files between Food Hygiene and Food Standards.</li> <li>b.) Database records to be comprehensive by scanning on all documents</li> </ul>	<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 there was a clear distinction between</p>	By end of March 2016

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE (June 2014)	UPDATE ON ACTION PLAN PROGRESS (as at June 2015)
		<p>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>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>	<p>Awaiting printing</p>
<p><u>Feed</u> 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]</p>	<p>Ongoing</p>	<p>These records now exist for all work completed since the FSA audit. However, recognise this needs to be maintained fully.</p>	<p>All feed work undertaken 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.</p>	<p>Ongoing</p>
<p>16.18(ii) Ensure records and intervention / inspection reports are kept for at least 6 years. [The Standard - 16.2]</p>	<p>Completed</p>	<p>This is now being done</p>	<p>This is being done.</p>	<p>Ongoing</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE (June 2014)	UPDATE ON ACTION PLAN PROGRESS (as at June 2015)
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.	Ongoing