



# FOOD SERVICE

## SERVICE PLAN

2016-2017



# FLINTSHIRE COUNTY COUNCIL FOOD SERVICE PLAN 2016-17

## INTRODUCTION

The Service Plan relates to the year commencing 1st April 2016 and ending 31st March 2017.

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

The purpose of this Plan is to provide:

- Information about the scope of the Service.
- Information about the services provided.
- Information about the means of Service provision.
- Information about performance of the Food Service against Performance Targets set out in 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 2016-17

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## 1.0 SERVICE AIMS AND OBJECTIVES

### 1.1 Aims and Objectives

The aims of the Food Service are to:

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

These will be achieved by:

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

## 1.2 Links to Corporate Objectives and Plans

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

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

The Food Service Plan has direct links with the County Improvement Priorities and Improvement Plan 2012 – 2017. The improvement 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.

The Food Service sits within the Public Protection Service of the Planning and Environment Portfolio. 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.

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 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 Team Leader - Trading Standards Compliance and Animal Health. The Team Leader – Food Safety and Food Standards reports in to the Public Protection Service Manager – Business and the Team Leader – Trading Standards Compliance and Animal Health reports in to the Public Protection Service Manager – Community. 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).

## 2.3 Scope of the Food Service

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

### Food Safety

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

- 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 1326 food premises in Flintshire. Of the total number of food premises in Flintshire approximately 944 are caterers, with the remainder being made up predominantly by 335 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 44 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 number of premises which fall into this category is due to increase this year due to the change in interpretation of a particular clause of the legislation by the Food Standards Agency. They have therefore directed local authorities to implement this new interpretation by the end of June 2016. This will raise this number to 16 premises approved under EU Regulation 853/2004.

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. However neither of these are open for harvesting at present. The shellfish beds can place significant demands on the Team, particularly during the six month cockle opening season. The management of the Dee accounts for a large portion of the Sampling Budget due to the statutory sampling of the water and shellfish. Enforcement on the Dee involves a cross-agency partnership working with National Resources Wales, Wirral Council, the Centre for Environment, Fisheries and Aquaculture Science (CEFAS), other neighbouring Local Authorities, the North Western Inshore Fisheries and Conservation Authorities and the Food Standards Agency Wales.

#### Port Health

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

## 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 applied 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 detailed in Table 1:

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

FOOD STANDARDS			FOOD SAFETY			
Risk	Min.	No. of		Risk	Min.	No. of
High	12 months	13	High	A	6 months	2
				B	12 months	31
Medium	2 years	400		C	18 months	453
Low	5 years	723	Low	D	2 years	253
				E	3 years	543
OUTSIDE		15		OUTSIDE		24
UNRATED		175		UNRATED		20
<b>TOTAL</b>		<b>1326</b>		<b>TOTAL</b>		<b>1326</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.

## Feed

Under the EU Feed Hygiene Regulation (183/2005) feed activities are clearly defined and are broken down in to 'Approved' and 'Registered' feed activities. Activities requiring Approval include any activity involving the manufacture and/or placing on the market of feed additives including zootechnical products (the technology of animal husbandry), with all such activities being classed as high risk. There are currently no businesses

in Flintshire that have an approval under the Regulation. 'Registered' feed activities are all other feed activities that are undertaken of which there are 14 registerable feed activities defined and coded by the FSA.

In Flintshire there are a total of 404 registered feed premises which are currently registered for a total of 509 registerable feed activities. These activities are made up as follows: 340 are registered as farms (Livestock or arable), 18 as feed manufacturing and packing businesses, 92 as on farm feed mixers, and 42 businesses registered for the supply of surplus food or co-products of manufacture. The remainder of the registered premises are engaged in storage 7, transportation and distribution of feed 10.

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

Following a review by Food Standards Agency Wales in 2014 of the delivery of Animal Feeding Stuffs Enforcement across Wales, with effect from 01<sup>st</sup> April 2015 the system for risk assessing feed activities was simplified with all registerable feed activities across Wales being broken down in to one of two categories based on risk. These two categories are referred to as '*Above the Line*' and '*Below the Line*'.

Above the line activities are the high risk activities and those premises include all businesses undertaking any 'Approved' feed activity and those engaged in 'Registered' feed activities involving production, processing, storage, transportation, sale of feed. These activities require a 'qualified' and competent officer to inspect them.

Below the line activities are the low risk activities that include premises that are feeding animal feed stuffs to livestock or growing straight feed crops that are to be consumed in their natural state such as silage. This applies to all of Flintshire's farms.

The frequency of inspection of feed premises has since 1<sup>st</sup> April 2015 been determined by FSA Wales with the launch of the FSA Wales sponsored North Wales Feed Enforcement Delivery Plan. The plan for 2015/16 required Flintshire to inspect premises across the county for a total of 76 registered feed activities, 54 of these were above

the line with the remaining 22 being below the line. The figures for 2016/17 are 52 above the line inspections, and 26 below the line inspections giving a total of 78 for the year. The breakdown of the Feed premises profile is detailed below by risk band:

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

<b>FEEDINGSTUFFS</b>		
<b>Risk</b>	<b>Frequency of Inspection</b>	<b>No. of registered activities subject to inspection</b>
High	Every 3 years.* * 31.5% of high risk inspections are currently being conducted per annum as per 2015/2017 FSA Wales plan.	169
Low/Medium	Every 14 years.* *7% of low risk inspections are currently being conducted per annum as per FSA Wales plan.	340
<b>TOTAL inspectable registered activities</b>		<b>509</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 Language Standards of the Council which came in to force on 30 March 2016. Approximately 14% of residents in Flintshire are recorded as Welsh speaking.

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.

### 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 2016-17 and a number of Service Improvement Data relating to all 3 areas of the Service for 2016/2017 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 2015/2016 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 87.7% actually being achieved. The Food Standards New Business target of 75% was also exceeded by achieving 87.4%. This was enabled by the majority of new business inspections being undertaken by the officers who are authorised to carry out both Food Standards and Food Safety inspections thereby facilitating the inspections being completed by one visit. This also ties in with the Reducing the Burden on Business agenda by combining the 2 types of inspection.

There is a Public Accountability Measure in place, namely the percentage of businesses which are Broadly Compliant with Food Hygiene legislation. For 2015-16, this figure has improved from 95.6% to 96.4% of food businesses within Flintshire falling into this category.

For D risk band Food Hygiene inspections, a figure of 100% of inspections was achieved and a total of 91.3% of E risk band premises interventions achieved. For the E risk band premises, this was by a combination of both inspections and alternative enforcement questionnaires as permitted by the Food Law Code of Practice (Wales) 2014.

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

#### Food Safety

- Inspect 100% of High Risk (A-C risk bands) food premises for Food Safety.
- Inspect all D risk band premises for Food Hygiene.
- Undertake a physical inspection all E risk band premises for Food Hygiene that fall within the scope of the Food Hygiene Rating (Wales) Act 2013 but have not had a physical inspection since the introduction of the legislation.
- To revisit all premises receiving a Food Hygiene Rating of 2 or lower, in line with the All Wales Revisit Policy written by the All Wales Food Safety Expert Group.

#### Food Standards

- Inspect 100% of all High Risk (A) risk band food premises for Food Standards.
- Inspect all overdue Medium Risk (B) risk band premises for Food Standards.
- To use the Alternative Enforcement Strategy on all eligible C risk band premises for Food Standards.
- Inspect all C risk band premises for Food Standards that fall out of the scope of being included in the Alternative Enforcement Strategy.
- Undertake a physical inspection of all premises that have not yet been inspected for Food Standards.
- 

A full breakdown of premises programmed for inspection 2016-2017 in relation to their risk band is given in Appendix 2. For Food Hygiene this gives a total of 648 inspections due and for Food Standards a total of 499 inspections due.

## Feed

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

Currently the FSA are specifying the level of inspection each year as part of their plan. This has seen during 2015/16 an inspection level of 31% for high risk and 6.5% of low/medium risk. This was met in full by Flintshire. For 2016/17 the targets set by FSA are 32% and 7.6% respectively.

### 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 Better Regulation Delivery Office relating to Primary Authority (PA) matters.
- Investigation of notified food safety related fraud incidents, such as illegal slaughter of meat, including referrals made anonymously.
- Issue of Sanitary Certificates as appropriate for incoming vessels to the Port of Mostyn.
- Appropriate response and liaison with other agencies as necessary for Civil Contingency matters.
- Assessing non-compliance with the Food Hygiene Rating (Wales) Act 2013, in regard to mandatory display of food hygiene ratings stickers and taking any enforcement action, as necessary.
- Additional proactive inspection at the Urdd Eisteddfod being held in Flint at the end of May 2016.

### 3.1.2 Resources for Inspections and Additional Enforcement Activity

#### Food Safety and Food Standards

The programmed food hygiene inspections will be undertaken by Environmental Health Officers (EHO) and Food Safety Officers (FSO). A full breakdown of resources is given in 4.2 – Staffing Allocation.



Food Standards work will be carried by our Trading Standards Officer, EHOs and FSOs who have completed their Food Standards module.

One of our Food Safety Officers returned 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. Unfortunately this will not be actioned until 2018 due to the course being fully booked until this date. The Food Standards Agency have been asked to look at this as many local authorities are needing their Food Safety Officers to obtain this additional qualification.

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

#### Feed

All aspects of feed work will be carried out by 0.2 FTE fully qualified Trading Standards Officer and 0.2 FTE Trading Standards Enforcement Officer.

### 3.2 Food/Feed Complaints

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

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

#### Food Safety and Food Standards

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

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

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

The Food Standards Agency have developed a new Food Problem Reporting System, which has only recently been introduced. Early indications are that the number of complaints will increase due to this system being introduced.

### Feed

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

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

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

Complaints received when investigated are generally down to the user rather than the producer and the effects are therefore limited to one premises or business. This makes this area quite a complex one to deal with a heavy reliance on the honesty of the buyer to be open with officers with regard to their own acts or omissions that may have caused illness or injury to their livestock.

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

### 3.3 Primary Authority Principle

#### Food Safety and Food Standards

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

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

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

#### Feed

There is currently no 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 during inspections or upon request, for all Flintshire businesses, including a service in accordance with the BRDO Primary Authority Principle and the Local Government Regulation (previously LACORS) Home Authority Principle.

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

#### Food Safety and Food Standards

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

- During inspections and as part of follow up

documentation.

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

Based on last year's trends, the estimated number of requests for advice, including those proposing to start up a food business for the forthcoming year, is anticipated to be approximately 170 in relation to Food Safety. Advice to businesses is provided by all members of the Team.

For Food Standards, it was anticipated the resource required for Advice to Business was 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. However, it was found that the majority of this advice was able to be provided during programmed inspections rather than as additional requests for service.

### 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.

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

### 3.5 Food Inspection and Sampling

#### 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 2015-2016. These were undertaken in collaboration with the North Wales Region. The regional grant amounted to £25,314 in total across the region, of which approximately one sixth was awarded to Flintshire Food Safety and Standards Team.

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

All samples are submitted using the UK-Food Surveillance System (UK-FSS) to better target resources in respect of the Food Sampling for Food Standards and by using the latest Internet-based version of the database. This will continue to be used for Food Safety and Food Standards sample submission during 2016-17.

Sampling Projects undertaken during 2015-2016 included:

- Acrylamide in ready to eat chips from fish and chip takeaways
- Meat species substitution in takeaways
- 'Free from' allergen claims
- Allergens in non pre-packed foods
- Additives – colours in sauces and seasonings
- Microbiological Examination of Hot Pies and Pastry products in hot holding cabinets

Samples were also taken as part of programmed inspections at manufacturers and premises where product specific legislation applies.

Proposed Sampling Projects for 2016-17 are predominantly as part of the North Wales Trading Standards Collaboration Plus Project. These include:

- Meat labelling for Country of Origin
- Gluten Free/Allergens
- Meat speciation in meat products and meat preparations
- Food Supplements

- Additives – food colours

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

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

- Microbiological Examination of pre-packed sandwiches
- Microbiological Examination of ready to eat foods dispensed from nozzles

### Feed

Sampling of Feeding stuffs during 2016/17 will be undertaken as part of the FSA funded North Wales Feed Service Delivery Plan (part of the North Wales Trading Standards Collaboration). Flintshire are currently not aware of the FSA Wales requirements for sampling of feed during 2016/17 but have committed to participate in any FSA Wales funded sampling projects that occur during the year. Other than sampling directly funded by FSA Wales Flintshire will not be in a position to take any feed samples other than in response to complaints received or feed safety incidents.

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

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 190 and 230 cases of sporadic notifications and between 0 and 10 outbreaks.

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



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

### 3.7 Food/Feed Safety Incidents

#### Food Safety and Food Standards

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

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

There were several incidents within 2015-16 which required considerable investigation work and enforcement action by the Team. These ranged from serious foreign body and microbiological contamination of food, mislabelling and undeclared allergen through to an incident relating to stowaways found in a food transport vehicle.

#### Feed

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

Responses to Feed Alerts will be kept in a centralised documented format and the contact details for the Team and relevant Agencies (including out of hour's contacts) will be kept up to date. It is difficult to quantify the resource implication of this function as it depends upon the nature of the Feed Alert and the 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/liason 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 and Communicable Disease Task Group. There is also close liaison with the North Wales Trading Standards Collaboration Project.
- Liaison with other relevant local bodies, e.g. Magistrates Courts, the Licensing Committee as well as liaison with local fishermen by way of the North Wales and Deeside Shellfish Liaison Group.
- Liaison with other Departments within Flintshire County Council, such as the Planning Department. A system of formal consultation with relevant sections of the Public Protection Service has been set up, so that prompt, appropriate advice may be given to ensure compliance with relevant legislation.

In addition to all of the above, liaison is also maintained between members of the Food Team by monthly Team Meetings and weekly Team Briefings. There is also a weekly Team Leader meeting for Team Leaders within the Public Protection Business Sector 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 (NTS) and the Association of Chief Trading Standards Officers (ACTSO).
- Other Local Authorities across Wales and the UK
- Partner Local Authorities in the North Wales Feed Enforcement Delivery Plan (Wrexham, Denbighshire, Gwynedd, Ynys-Mon, and Conwy).
- Liaison with regional and national panels and expert interest groups including the joint WHoTS/FSA Feed Working Group, WHoTS and UK Animal Health and Welfare Panels etc.

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

We delivered a very successful North Wales regional project on implementation of Food Safety Management Systems in Poorer Performing premises with a focus on Cleaning. This was grant funded by Food Standards Agency Wales. We took on the role of Project Lead as part of the North Wales Environmental Health and Licensing Collaboration project.

We delivered 2 presentations on updates in Food Safety legislation and guidance and on Allergen Information Compliance at the Food and Hospitality Conference held at Coleg Cambria in October 2015. This was a full day event and was attended and very well received by approximately 200 food businesses from across the North Wales region. It

We delivered a presentation at the Clwydian Range Food Trail's Annual General Meeting in June 2015 to advise the businesses within the organisation on how to improve their Food Hygiene Rating. The Clwydian Range Food Trail is a consortium of local producers and hospitality business who have come together to encourage the use of local produce in their sector, and promote the area locally and nationally.

We delivered Allergen Information training to Ysgol Bryn Coch akin to that delivered to all other Flintshire schools in 2014-15.

Promotional work programmed for this year includes:

- One of the Food Safety Officers is carrying out Healthy Pre-school Hygiene Assessments as part of the Healthy and Sustainable Pre-school Scheme.
- This year's Food Safety Week theme is Food Waste and is running week commencing 3<sup>rd</sup> July. The core message for this year is to educate consumers on the difference between Use By and Best Before dates and to advise and encourage the use of leftovers to reduce on food waste.
- Taking part in Allergy Awareness Week which runs for a week commencing 25<sup>th</sup> April by use of Facebook and Twitter.
- Deliver a regional collaborative project on the implementation of Food Safety Management Systems in butchers handling both raw meat and ready to eat foods.
- Advising businesses of the change in legislation in relation to nutritional declaration on labels.
- Advising takeaways of the introduction of new legislation in relation to the promotion of food hygiene ratings on promotional material. This is a new set of regulations which will require takeaways to provide a bilingual statement on any promotional material that includes both a method of ordering and a price for food to be ordered e.g. a takeaway menu.

### Feed

Officers of the service work with the trade offering advice and guidance on compliance with legal and best practice standards during routine inspection work conducted on farms, in shops, and in factories on behalf of FSA Wales and during our work at Critical Control Points (CCP's)

including Mold livestock auction when carrying out routine animal health and welfare and disease control work. Promotion work is done as part of routine inspection or in response to enquiries made by business to the service.

## 4.0 RESOURCES

### 4.1 Financial Allocation

The financial allocation for the Food Service is split between budgets provided for the Animal Health and budgets provided for the Food Safety and Food Standards Service.

The overall level of expenditure providing the Food Safety and Food Standards Service for 2016/2017 is detailed below in Table 3.

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

COST ITEM	FINANCIAL ALLOCATION
(a) Staffing (total staff costs)	£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 4 shows the overall level of expenditure for Feed Service delivery:

**Table 4: Budget for the Feed Service Delivery 2016/17**

<b>COST ITEM</b>	<b>FINANCIAL ALLOCATION</b>
(a) Staffing (total staff costs )	£10805.79
(b) Travel (lump sum and mileage) and Subsistence	£2000.00
(c) Equipment (including investment in I.T.*)	£500.00
(d) Sampling	No current budget but funding may be available from FSA Wales later in 2016/17 for targeted project work.
(e) Training	£300.00
(f) Total	£13605.78

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

#### 4.2 Staffing Allocation

##### Food Safety and Food Standards

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

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

In accordance with the Food Law Code of Practice (Wales) April 2014, all Environmental Health Officers in post are qualified Environmental Health Officers, registered with the Environmental Health Registration Board (E.H.R.B.). Food Safety Officers are qualified to the Higher Certificate in Food Premises Inspection and all officers are qualified in HACCP Principles (Hazard Analysis Critical Control Points). 2 of the Food Safety Officers also hold the Higher Certificate in Food Control.

All staff are authorised appropriately for the duties they perform. All EHOs meet the post 2 year qualified competency requirement to use all enforcement powers required by the Code of Practice. In addition to the above, the Team Leader for Food Safety and Food Standards is also a qualified Lead Assessor having successfully completed the five-day Lead Auditor Training Course.

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

The Food Standards Agency Wales require the service plan to include an estimate of the number of Full Time Equivalents we would require to deliver the Food Law Code of Practice in its entirety. Due to the considerable amount of work that was put in to addressing the Food Safety inspection back log during 2015-16, the Food Safety component of the service is being delivered in accordance with the frequencies determined by the Food Law Code of Practice.

For Food Standards, there has been significant work in reducing the back log of inspections and we are on track to reduce this back log in accordance with the action plan from our Food Service Audit by the Food Standards Agency Wales by the end of March 2017.

To best achieve this we would require all our Food Safety Officers to be Food Standards competent.

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



**Table 5: Full Breakdown of Resources to Deliver the Food Safety and Food Standards Service**

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

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

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

#### Feed

All aspects of Feed work will be carried out by two officers of the service. These are currently 0.2 FTE Team Leader –Trading Standards Compliance and Animal Health (subject to review following recent organisational change) and 0.2 FTE Trading Standards Enforcement Officer.

The Team Leader is currently the only officer within the team that satisfies all criteria as a qualified and competent 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. Both officers satisfy the requirements to ensure a minimum of 10 hours relevant CPD is maintained annually.

#### 4.3 Staff Development Plan

During the forthcoming year the following training is planned:

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

Each individual's training requirements are going to be set out in the Planning and Environment Learning and Development Plan 2016-2017.

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 2015-2016 include:

- Food Information Regulations Improvement Notices
- Approved Premises
- North Wales Consistency Training
- Enforcement Sanctions
- Investigative Interviewing
- Annual Food Safety Conference
- Food Identification Module for the Higher Certificate in Food Control for Food Safety Officers

- Dairy Processing

Attendance at the Lead Officer for Communicable Disease Training included:

- Zoonoses Update
- Reflective Practice in Public Health
- Understanding Core and Wider Legislative Controls

Training planned for 2016-2017 includes:

- Regional Consistency Training
- E. coli O157 Refresher Training
- HACCP Refresher Training
- Micro criteria and Listeria Training

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. This includes:

- Enforcement Sanctions
- Vacuum packing and Sous Vide processing
- Food Standards Inspections for Food Safety Officers
- Food Standards Auditing of Manufacturers refresher
- Nutritional Declaration
- Intelligence Gathering

#### Feed

Both the Team Leader – Trading Standards Compliance and Animal Health and the nominated Trading Standards Enforcement Officer have attended specialist training on Feedstuffs during the period 2015-2016, and will continue to undertake ongoing training as part of CPD for feed during 2016/17.

## 5.0 QUALITY ASSESSMENT

### 5.1 Quality Assessment Food Safety and Food Standards

Within the Food Service, quality systems are in place to ensure that work is completed and checked by a competent person in line with the fully documented Quality Monitoring Procedures. Documented procedures and work instructions exist to ensure consistency of approach with various computer report mechanisms to

check accuracy on the APP Database. Work Instruction is provided on Key Areas of work retained within Formal Procedure Manuals.

The Team Leader attends the North Wales Food 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. The revisit to this audit was carried out by 3 auditors in November 2015. The revised action plan based on this revisit is contained within Appendix 4.

## **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 2015-2016 Service Plan

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

Appendix 3 provides full quantitative analysis of service delivery during 2015/16.

Food Safety and Food Standards

General achievements of note are listed below:

- Achieved 100% of High Risk Food Safety and Food Standards inspections.
- Achieved 100% of D risk band Food Safety Inspections and 91.3% of E risk band Food Safety Interventions. (At the time of writing only 1 of the E risk band food business that was due a Food Safety inspection in 2015-16 is still overdue. This is due to issues with access as several attempts to inspect the premises have been made.)
- Considerable progress has been made on reducing the back log of Food Standards inspection. This is in line with the Audit Action Plan with the Food Standards Agency Wales.
- The advisory approach taken in the Poorer performing premises project yielded good results in improving the level of compliance in the business and in improving the relationship between the business and the officer carrying out the intervention. This same effect was seen across the North Wales region.

- The percentage of premises with a Food Hygiene rating of 5 has increased from 68.6% to 71.9%. 95.7% of businesses have a rating of 3 or higher compared to 95.2% in the previous year.

### Feed

Achievements for 2015/16:

- FCC continued to work with FSA Wales and in collaboration with the five other North Wales Local Authorities to develop and implement the FSA Wales funded North Wales Feed Service Delivery Plan. The plan is to enable a uniform and consistent approach to feed service delivery across Wales making best use of limited financial and officer resource in improving and maintaining feed hygiene and standards across the industry.
- All inspection targets for inspection of registered feed activities for 2015/16 as set by FSA Wales were met. This was 32% of high risk and 6.6% of low risk activities with the full available funding allocation being claimed from FSA Wales.
- The two feed officers attended a number of feed training events organised by both FSA Wales and the North Wales collaboration. These included sampling and inspection training/refresher events and update training on legislation. Both officers have maintained their CPD and met the minimum requirements set for CPD by FSA Wales.

### 6.3 Areas of Improvement 2016-2017

Areas requiring focus for the forthcoming year are as follows:

- Continue the work already put in last year to get up to date with all overdue inspections for Food Standards by the end of March 2017.
- Continue work on full implementation of the FSA audit action plan in line with the stated completion dates. These are detailed in Appendix 4.
- Follow up work was done on the non-display of Food Hygiene Ratings and no Fixed Penalty Notices had to be issued due to the high level of compliance in previously non-compliant businesses. However a further exercise will need to be carried out this year to assess whether this high level of compliance is being maintained.

- Prioritising E risk band premises that had been subjected to a Food Safety Alternative Enforcement Questionnaire for physical inspections so that all premises within the scope of the Food Hygiene Rating (Wales) Act 2013 have a rating sticker.

#### Feed

- Continue 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.
- 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'.
- Continue the further development of 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.
- The qualified officer role within the team is to be reviewed based on the recent reorganisation of what is now the Trading Standards Compliance and Animal Health Team, to make best use of available resources within the revised team which will allow greater flexibility to achieving feed inspections and feed work.



#### 6.4 Forthcoming Considerations

There are several considerations which may influence or impact on Service Delivery for 2016/17. These are detailed below:

##### Food Safety and Food Standards

The Service Plan relies on the current level of staffing to be maintained. These posts will need to remain filled for the whole of 2016/17 for the commitments made for Service Delivery to be met.

Further to the Food Standards Agency Wales 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, a second report was published in February 2016. This was titled 'The Statutory Food Hygiene Rating Scheme in Wales. Review of the Operation of the Appeals System. The report made three recommendations detailed below:

- That the system currently in place for businesses to appeal their food hygiene ratings in Wales is maintained and reviewed in 12 months in accordance with the Act.
- Local authorities should ensure that all officers who rate food businesses under the Food Hygiene Rating Scheme continue to engage in activities that promote consistency, including the determination of appeals.
- Local authorities and the FSA should work collaboratively to more effectively signpost food business operators to relevant information on the safeguards available to them should they not be satisfied with the food hygiene ratings issued to their businesses. This should include details of the appeals process.

The Food Law Code of Practice Wales has been consulted on and it was anticipated that it would have been introduced by April 2016. However, this is not the case and at the time of writing, we are unclear as to the intended date for introduction. The draft document which was consulted on contains significant changes to the qualifications assessment for officers undertaking food law enforcement duties.

The Food Standards Agency has launched a consultation early in 2016 regarding changing the delivery model for Food and Feed Controls called Regulating the Future. The objective of the programme is to 'define and then deliver a new regulatory blueprint for a food industry unrecognizable from the one that existed when the current system was designed'. The proposal is to radically alter the blueprint of the delivery model to best support compliance and protecting consumers' interests in line with the FSA's 2015-20 Strategy of 'food we can trust'. The FSA are anticipating this high level vision will take several years to fully design and deliver but have identified that where immediate incremental improvements can be made to consumer protection, these will be made as part of on-going activities.

The outcome of the EU Referendum may affect the service as the legislation enforced is predominantly EU-based.

#### Feed

The new delivery model for feed service delivery on a regional basis is now entering its second year of operation, with targets being set by FSA Wales and all work being paid for on completion against a fixed price menu dependent on feed activity and inspectable risk. Although the new delivery model appears to be working well the FSA's intentions are not known beyond the end of 2016/17 with regard to expectations from Local Authorities or any funding to Local Authorities for feed service delivery.

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

Following the FSA audit in 2013, the Food Safety and Food Standards elements of the Food Service received a follow up audit to assess progress with the audit action plan. This took 2 days with 3 auditors and involved an element of re-auditing elements looked at during the initial 5 day audit. As previously stated, this amended action plan is attached in Appendix 4. Of the original 18 recommendations, 7 have been signed off as completed. The remaining 11 are assigned as Good Progress made. The auditors verbally described the progress made by the Authority as 'exemplary'.

Chart 1

# FLINTSHIRE COUNTY COUNCIL - ORGANISATIONAL STRUCTURE

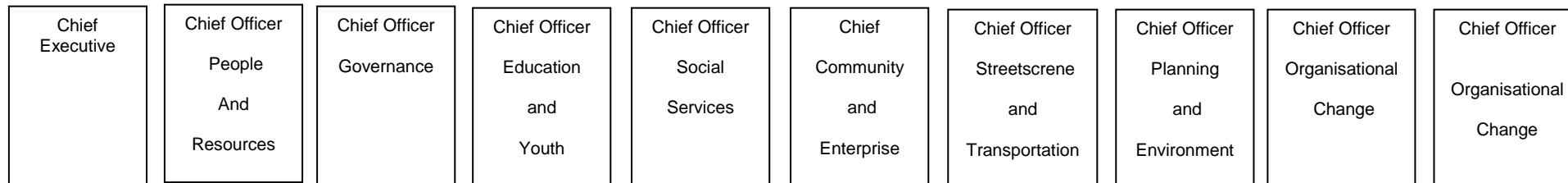


Chart 2

# FLINTSHIRE COUNTY COUNCIL – POLITICAL STRUCTURE

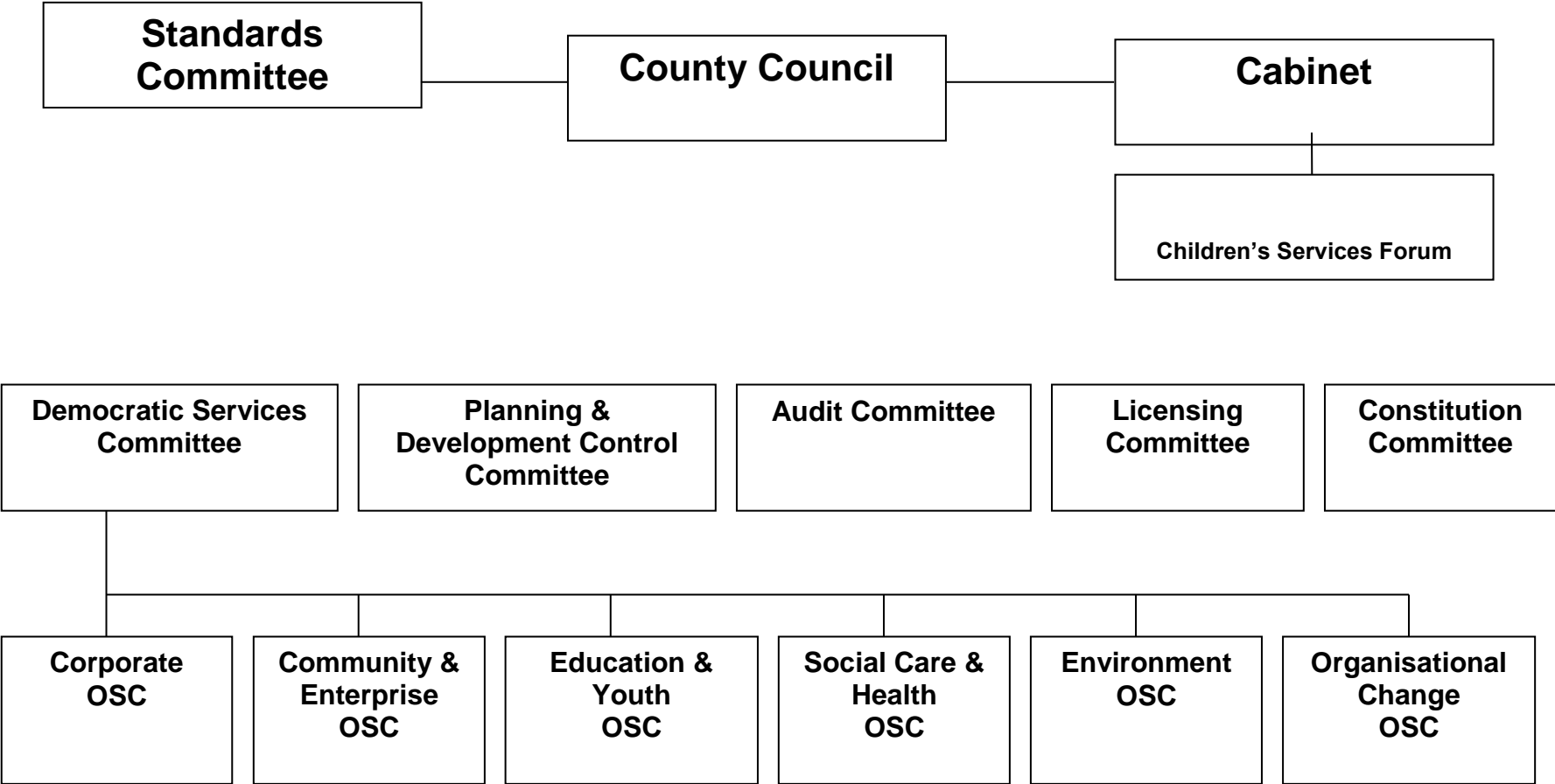
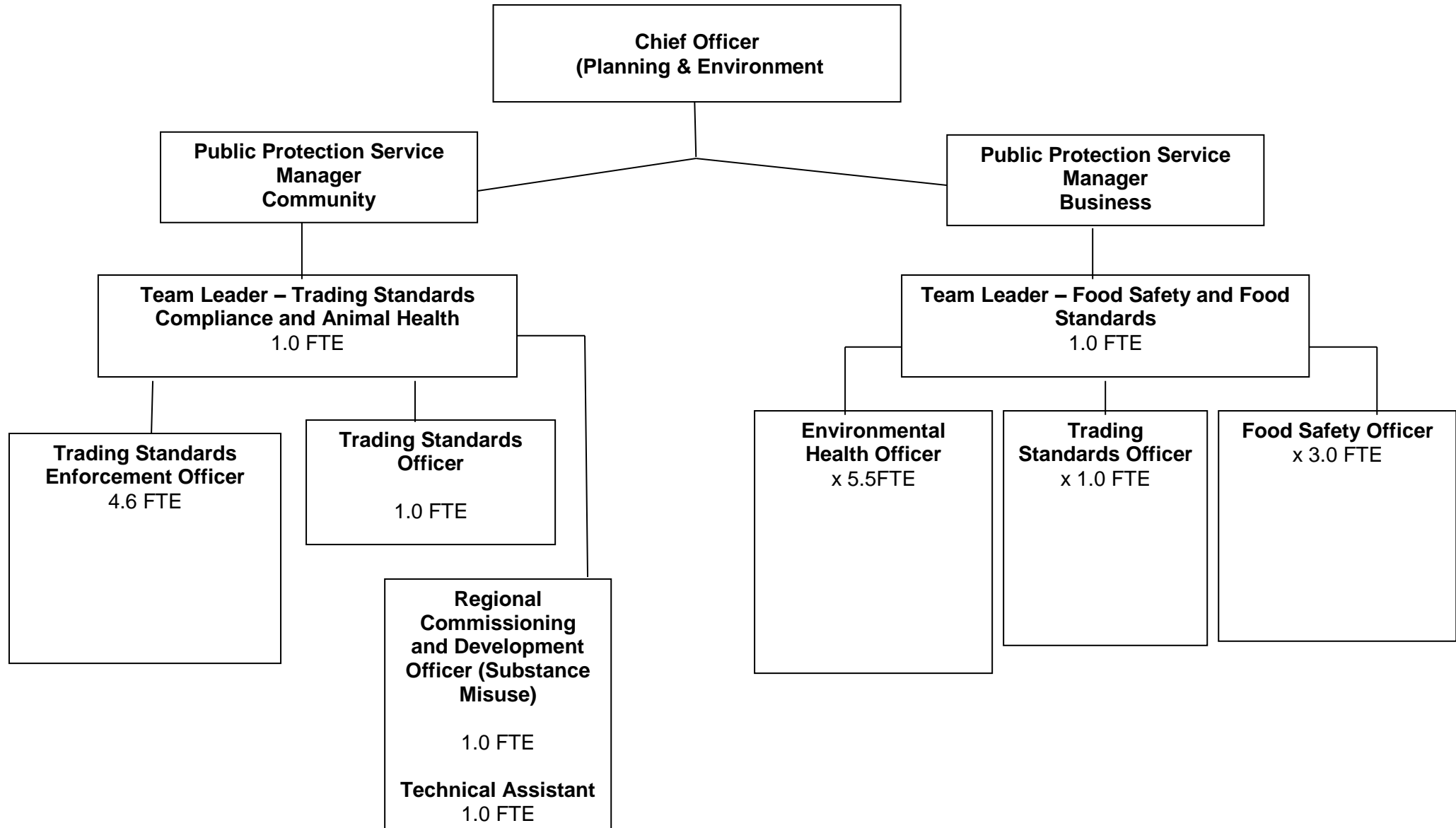


Chart 3

# PUBLIC PROTECTION - FOOD SERVICE



## APPENDIX 2

Please find below a breakdown of the profile of programmed Food Safety and Food Standards inspections for 2016/2017 by Risk Rating:

**Table A**

<b>PROGRAMMED INSPECTIONS - FOOD SAFETY</b>	
<b>Risk</b>	<b>Number Due</b>
A	2
B	31
C	262
D	124
E	199
Unrated	30
<b>TOTAL</b>	<b>648</b>

**Table B**

<b>PROGRAMMED INSPECTIONS - FOOD STANDARDS</b>	
<b>Risk</b>	<b>Number Due</b>
A	13
B	187
C	154
Unrated	145
<b>TOTAL</b>	<b>499</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 2016/2017 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	2
Feed Stores	1
Feed Distributor	2
Feed Transporter	1
On Farm Feed Mixers	33
Supplier of Surplus Food	6
Livestock Farms	26
Arable Farms	Yet to be confirmed by FSA (08/05/2016)
<b>Total</b>	<b>78</b>

The type (by feed activity) and number of feed inspections to be conducted during 2016/17 by Flintshire has been determined by FSA Wales. This is as part of year two of the recently launched FSA Wales funded North Wales Feed Enforcement Delivery Plan.



## APPENDIX 3 – PERFORMANCE 2015-16

### Food Safety

Risk	Programmed	Achieved
A ) High Risk	2	100%
B ) High Risk	34	100%
C ) High Risk	268	100%
D Low Risk	146	100%
E Low Risk	195	91.3%
<b>TOTAL</b>	<b>645</b>	

<b>TOTAL</b> Number of Interventions Undertaken (including Revisits)	<b>919</b>
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### Food Standards

Risk	Programmed	Achieved
High	17	100%
Medium	245	80%
Low	120	77.5%
Unrated	100	100%*
<b>TOTAL</b>	<b>482</b>	

<b>TOTAL</b> Number of Interventions Undertaken (including Revisits)	<b>564</b>
--	------------

- At the beginning of the year we had 301 food premises that had not received a Food Standards inspection. We had programmed to do a third of the overdue unrated inspections in 2015-16. However, we inspected more than originally programmed. The actual number of unrated premises that received an inspection for Food Standards was 134 with a further 48 premises having ceased trading.

Feed Inspections (as per requirements of FSA/WHoTS Regional FLEDP 2015/16)

<b>Risk</b>	<b>Programmed</b>	<b>Achieved</b>
High	54	100%
Medium/Low	22	100%
<b>TOTAL</b>	<b>76</b>	<b>100%</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	71.9	19.3	4.5	2.1	2.1	0.1

Number of Requests for Rescore Visit to be undertaken - 24

Number of Appeals on Rating - 2 (rating was subsequently increased on appeal)

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

Food and Feeding Stuffs Complaints

Food Safety number of complaints - 90

Food Standards number of complaints - 15

Feeding Stuffs number of complaints - 0 (Nil)

## Advice to Business

- Food Safety - 160 requests for advice  
99.4% responded to within 10 working days  
96.3% within 5 working days
- Food Standards - 13 requests for advice  
100% responded to within 10 working days  
100% responded to within 5 working days
- Feeding Stuffs - 15 requests for advice – primarily regarding new registrations were received, all were responded to within 5 working days.

## Food and Feeding Stuffs Inspection and Sampling

- Food Safety - 34 samples – statutory and monitoring
- Food Standards - 56 samples – monitoring of which 12 were Unsatisfactory
- Feeding Stuffs - No complaints regarding animal feeding stuffs were received during the period 2015/16 and therefore no complaint samples were taken. Sampling was undertaken across North Wales as part of project work carried out at the request of FSA Wales as part of the North Wales Feed Law Enforcement Delivery Plan. However, this did not require samples to be taken by Flintshire.

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

- Sporadic Notifications - 202 of which 136 were Campylobacter
- Outbreaks - 1 found not to be food-related

## Other Types of Service Requests (Food Safety only)

- Water Disconnections - 16
- Shellfish Requests for Registration Documents - these are now administered by Natural Resources Wales on our behalf
- Ship Sanitation - 0
- Export Certificates - 4

**APPENDIX 4 – FOOD STANDARDS AGENCY WALES REVISED AUDIT ACTION PLAN**

Status Key

	Completed
	Good Progress
	Limited Progress
	No Action Taken

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

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

**Follow-Up Visit Date: 26 November 2015**

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

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

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

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

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



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

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

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

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

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

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
		being sent out later will be recorded on file.	being sent out within 14 days in compliance with the Food Hygiene Rating Scheme. Any deviation on reports going out is recorded on the database.	
<p><u>Food Standards</u> 16.15(i) Maintain up to date and accurate records in retrievable form on all food establishments in its area in accordance with the Food Law Code of Practice and centrally issued guidance. These records shall include reports of all interventions/inspections, the determination of compliance with legal requirements made by the authorised officer, details of action taken where noncompliance was identified, details of any enforcement action taken, and relevant food registration information. [The Standard -16.1]</p>		<p>This recommendation relates to:</p> <ul style="list-style-type: none"> <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</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</p>	<p>Ensure food standards reports / records distinguish clearly between contraventions and recommendations and clearly specify the legislation.</p> <p>Revised date for completion: 27/05/16</p>

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

**Summary (excluding feed)**

<b>Total Recommendations</b>	<b>18</b>
<b>Completed</b>	<b>7</b>
<b>Good Progress</b>	<b>11</b>
<b>Limited Progress</b>	<b>0</b>
<b>No action</b>	<b>0</b>
<b>Total Outstanding</b>	<b>11</b>