



Neath Port Talbot
Castell-nedd Port Talbot
County Borough Council Cyngor Bwrdeistref Sirol

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL
CYNGOR BWRDEISTREF SIROL CASTELL-NEDD PORT TALBOT

FOOD & FEED LAW ENFORCEMENT
SERVICE DELIVERY PLAN
2016-2017



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1.0 SERVICE AIMS AND OBJECTIVES

1.1 Purpose of the Service

It is the policy of Neath Port Talbot County Borough Council to strive to ensure that food and drink intended for sale for human consumption, which is produced, stored, distributed, handled or consumed within the County Borough is without risk to the health or safety of the consumer; that it is described accurately and that it bears all required labeling and information. Additionally, the plan encompasses Food law enforcement to recognise the importance of ensuring food safety from the very beginning of the food chain (at producer/farm level), through to the consumer (the farm to the fork principle).

The Food Standards Agency (FSA), as part of its national Food Safety Framework Agreement, requires all local authorities to prepare a service delivery plan which reviews the implementation of the previous plan and details the delivery of their food safety enforcement responsibilities for the following year.

The plan seeks to ensure that national priorities and standards are delivered locally and provides a balanced approach to local food safety enforcement. This is achieved by not merely directing resources towards the programmed inspection process, but also by ensuring that adequate provision is made to address food & feed complaints, food poisoning notifications and other reactive work, advice to businesses, and also the ability to follow-up on intelligence driven areas of work such as sampling, food fraud and targeted inspections.

1.2 Aims and Objectives

The aims and objectives of the food and feed law enforcement service are:

- To help to maintain a safe and healthy environment in the County Borough
- To ensure food and feed produced or consumed within the area does not present a risk to health and to take action to prevent it entering or limiting its introduction to the food chain
- To ensure the effective control of feed destined for consumption by animals entering the food chain and pet animals
- To encourage good practices in food safety, food & feed standards and fair-trading, and to take action to discourage practices which are unfair to other traders or threaten health.
- To enforce the relevant environmental health and trading standards legislation by means of interventions at premises in the County Borough, e.g. sampling, investigation of complaints, intelligence led investigations and surveys, malpractices and cases of food poisoning

- To ensure that resources are targeted where they are most effective and address areas of highest public health risk
- To respond to requests for advice and to seek to raise awareness of food safety and food & feed standards issues
- To help business owners to comply with their obligations under food & feed legislation and to take appropriate action as per the enforcement policy against those who will not.

1.3 Link to corporate objectives and plans

In delivering the food and feed law enforcement service the Food and Pest Control section and Trading Standards section will continue to promote the corporate aims and objectives of the authority and sustain the reputation of the council. In particular the service will be delivered in a manner that is sensitive to service users and citizens individual expectations.

The 2016 -17 Business Plans of the Environmental Health section and the Trading Standards section will outline the specific ways the sections own Aims and Objectives contribute and link with the Corporate Aims and Objectives. Emphasis is geared towards protecting and improving health.

A corporate performance management framework monitors performance of all services within the Council. Local performance indicators are reported on a quarterly basis.

Local and National Performance Indicators exist for these services (see Paragraph 3.1.4 below).

2.0 BACKGROUND

2.1 Profile of Neath Port Talbot

Neath Port Talbot County Borough Council is situated in South Wales. The towns of Neath, Port Talbot and Pontardawe are the largest settlements in the Borough. A number of other villages and settlements are dispersed throughout the remaining rural valley areas of the County Borough. The County Borough serves a population of approximately 139,800 (Census, 2011) and covers an area of 44,217 hectares. It is the seventh largest authority in terms of population in Wales. There are approximately 1780 food/feed premises within the County Borough (being circa 1430 food premises and circa 350 feed premises) in which food or drink and feed or drink is produced, manufactured, processed, stored or sold. (See section 3.1 for further details on type of premises etc.).

2.2 Organisational Structure

The Charts attached as appendices A, B and C illustrate the organisational Structures of the Sections.

The functions of Environmental Health and Trading Standards sit within the responsibility of the Head of Planning & Public Protection service in the Directorate of Environment.

In February 2016, Environmental Health and Trading Standards services were transferred to the Environment Directorate, this followed an earlier restructure in September 2013.

The day to day service delivery of the Food & Feed Services are overseen by the Team Leader- Food & Health Protection, and the Team Leader- Trading Standards & Animal Health respectively.

External services are provided to the section by:

- Public Health Wales (formerly the Public Health Laboratory Service, PHLS) at West Wales General Hospital, Carmarthen– for food examination (Microbiological).
- Public Analysts (Minton, Treharne & Davies Ltd and Public Analyst Scientific Services Limited) – for food & feed analysis (Non-microbiological).
- Occasional use of contracted workers (contractors / locum officers) to cover maternity and other staffing shortfalls, or emergencies.
- Food Standards Agency - for guidance and partnership working opportunities.
- Citizens Advice Consumer Service - referrals of food and feed complaints.

2.3 Scope of the Food & Feed Law Enforcement Service

The Food Hygiene service is delivered by officers of the Food Safety Section. The Food Standards and Feed functions are delivered by officers of the Trading Standards section.

These sections provide the major link between the authority (as regulator of all food & feed businesses) and businesses within the County Borough.

In addition to providing the food safety and standards functions, the service also undertakes work in the arenas of fair trading enforcement; occupational health, safety and welfare; investigation and control of communicable diseases; health promotion; product safety; weights & measures; animal welfare; consumer frauds; petroleum licensing enforcement and underage sales.

The work of the service in relation to food/feed involves applying numerous Acts and Regulations to approximately 1780 food/feed businesses within NPT, including:

- Intervention at business premises to ensure compliance with the relevant legislation in accordance with the authority's annual intervention / inspection programme.
- Providing advice and assistance to businesses to ensure both the protection of the consumer and that trade, business and industry can compete on a fair and equitable basis.
- Sampling of a range of products sold on the open market with an emphasis on those produced within the County Borough in accordance with the annual sampling programme and policy (which includes food, animal feed and product safety).
- Health Promotion in relation to businesses and their employees
- Investigating complaints made by the public of items purchased and services received by them within the County Borough.
- Responding to food & feed alerts for food & feed produced or imported into the UK
- Inspecting weighing and measuring equipment at commercial premises within the County Borough and providing a verification / certification service
- Investigation of notifications of infectious diseases received by the Authority, including food poisoning to ascertain their cause, prevent their spread and if possible, prevent their recurrence.
- Assisting food businesses (particularly high risk premises) with the requirement for a documented Food Safety Management System (FSMS), based on HACCP principles (Hazard Analysis of Critical Control Points).
- Assisting feed businesses with the requirement for feed safety management systems, based on HACCP principles.

- Providing food hygiene and health and safety training for employers/employees within the County Borough.
- Animal Health and Welfare enforcement, including inspection of welfare of livestock and animal movement documents.
- Providing Food Hygiene Ratings for businesses covered by the legislation
- Investigating consumer fraud perpetrated by businesses within NPT and by businesses outside NPT, whose actions affect people and businesses within NPT.
- Business advice, explaining their rights and obligations both criminally and civilly

The sections primarily act in a proactive way, but also respond to complaints regarding businesses and issues affecting consumer purchases. This includes complaints of food hygiene, health and safety, fair trading etc., and also commercial complaints of pest infestation, drainage, waste accumulations, water sampling and inspections for licensing.

When necessary, Environmental Health Officer contractors and Trading Standards Officer contractors are used to cover long term sickness/maternity leave/vacant posts or project work funded by external sources.

The selection and use of external contractors will be a decision taken by the Environmental Health & Trading Standards Manager in consultation with the Head of Planning and Public Protection and will be subject to the following types of criteria:-

- That there is a direct need to ensure statutory duties are undertaken & relevant performance targets are met / outcomes realised.
- External contractors must meet the competency requirements of the Food Standards Agency Food Law Code of Practice (Wales) - General qualification and experience requirements, and
- The cost of the work can be met within existing authorised budgets and is in accordance with the Council procurement policies, or the cost of the work is being met externally (e.g. via the Food Standards Agency Wales).

2.4 Demands on the Food & Feed Service

The tables in 3.1 show the current breakdown of the numbers and types of premises within the County Borough. There are currently circa 1430 food and 350 feed premises which are subject to food & feed controls trading within the County Borough, which includes approximately 1349 registered food premises.

There are 3 specialist feed manufacturers operating within the County Borough which require a great deal of familiarity with the operation due to their technical nature. The inspection of these businesses require specific understanding, qualifications and competencies.

Food Hygiene and Food Standards advice leaflets in various languages are available to those outlets which require them, additionally multi-language on-line resources are available, such

as those in relation to good food hygiene practices, as part of the Food Standards Agency's initiative called "Safer Food, Better Business" (SFBB).

The Food Standards Agency has placed an emphasis on "interventions" at food & feed businesses rather than solely on full inspections. Full inspections / audits should be targeted on the businesses of highest risk, or for a specific reason (such as a complaint). Lower risk businesses will not necessarily be subject to a full programmed inspection, but will perhaps be dealt with by means of a survey or as part of the sampling programme.

We use the Local Authority Enforcement Monitoring System (LAEMS) to record and report Food premises and food law enforcement data.

The service is mainly provided between the normal council office hours of 8.30am to 5.00pm Monday to Thursday and 8.30am to 4.30 pm Friday. Outside of normal office hours, emergency food safety issues are currently directed initially to a 24 hour emergency call out service and the officer on-call has access to senior food officers in an emergency. Increasingly, additional work (including programmed inspections) is conducted at times outside of normal office hours in response to the need to deal effectively with businesses as we move more into a 24 hour economy, which primarily involves extra evening and weekend working.

The correspondence address for Environmental Health & Trading Standards is Civic Centre, The Quays, Brunel Way, Baglan. SA11 2GG. The services are more easily contacted via telephone on 01639-685678.

In addition, the Council's website (www.npt.gov.uk) is used to provide information about food safety services for consumers and business and also provides a direct email address for service requests i.e. ehd@npt.gov.uk & tsd@npt.gov.uk. The service also uses Facebook (NptEnvHealth/TradingStandards) and Twitter (NPTEHTS) and other Social Media.

Further demands will be made on the service in 2016/17 due to:

- The Freedom of Information Act.
- The continuing impact on food safety of the Pennington Report following the public inquiry (2009) into the South Wales E. coli outbreak (2005) and recommendations for enforcement.
- Sustaining collaboration on the implementation of the Mandatory Food Hygiene Rating Scheme and Food Hygiene Rating (Wales) Regulations 2013 and to provide open feedback on the compliance levels achieved by individual businesses.
- The further development of alternative enforcement activities, resulting in a reduction of low risk inspections, but with increased targeted educational and promotional work.
- Continued promotion of the requirement for relevant Businesses to be operating to a documented Food Safety Management System, which is commensurate with their activities.

- The repercussions of the new Consumer Rights Act and The Powers of Entry Code of Practice, reforming and redefining Trading Standards, how they operate and use their powers.
- The continued development of Trading Standards' intelligence led approach. Implementing the Intelligence Operating Model and deploying resources accordingly, identifying the areas of greatest need. Sharing intelligence related to food and feed with enforcement agency partners.
- The implications of the Simpson Review, and the subsequent Compact between Welsh Government and Local Authorities and the push for collaborative working and regionalisation of the services.
- Further development of cross boundary and regional work in the fields of food and feed, to ensure that resilience is built into service delivery.
- To continue to expand health promotion (e.g. food safety messages, nutrition, & smoking issues) into the daily delivery of the food service.
- Continued familiarisation, implementation and broadening of the Primary Authority System.
- Continuing to abide by the Framework Agreement and the Feed Law Code of Practice, and the soon to be revised Food Law Code of Practice for Wales and accompanying Practice Guidance.
- Continued implementation of Feed (Hygiene & Enforcement) Regulations 2005 and EU regulation 183/2005, until such time as replacement regulations are introduced following the exit from EU.
- Considering the national food and feed priorities set by the Food Standards Agency.
- Continue to advise consumers and traders on the Food Information Regulations 2013, which set out new requirements for food labeling, description and declaration of allergens.
- Identifying food businesses supplying "co-products" (i.e. former foodstuffs reprocessed as animal feed) and advising them of their obligations and responsibilities.
- Trading standards will continue to target nutrition issues relating to vulnerable sections of society and the food sold to the public sector.
- Closer working with internal local authority sections delivering food to service users (schools etc.)
- The continued development of the new regional feed enforcement delivery model with Swansea Trading Standards as per the agreement with the Food Standards Agency.

- Widening the use of the UK Food Sampling Surveillance System to encompass microbiological sampling.
- Continue to risk assess the unrated feed & food businesses within the county borough.
- Accommodating service delivery in line with the Business Plan relevant to the service, in addition to NPT's Forward Financial Plan (FFP).
- To continue to monitor for the presence of illicit and /or counterfeit foodstuffs that have been detected in other authorities, utilising and analysing intelligence received from the Regional Intelligence Officer and Food Fraud Unit.

2.5 Regulation Policy

An enforcement policy for the Environmental Health and Trading Standards services has been formulated and approved by Members. Members have also adopted the provisions of the Enforcement Concordat and the Regulatory Enforcement and Sanctions Act 2008 which are reflected in the enforcement policy.

Officers employed in the section will seek to ensure owners of food & feed businesses comply with relevant food & feed legislation by means of:

- providing information and advice,
- raising awareness of the law and good practice associated with the legislation,
- providing education and training,
- taking enforcement action where necessary.

The type of enforcement action taken will depend on the circumstances and the merits of each case. Officers will follow the guidance contained in relevant Food Law Code of Practice, Practice Guidance, the Primary Authority scheme etc. and the relevant internal policies.

In performing its enforcement function the authority will continue to strive to ensure that the overall objective of protecting the health, safety and economic well-being of residents and visitors within the County Borough is met.

3.0 SERVICE DELIVERY

3.1 Interventions at Food and Feeding stuffs establishments

3.1.1 Intervention Policy

The Food Law Code of Practice (Wales) has introduced the concept of ‘a suite of interventions’ as a key to improving compliance with food law by food business operators. The range of possible interventions allows officers to use their professional judgment to apply a proportionate level of regulatory and enforcement activities to each food business. Interventions will be applied in a risk-based manner such that more intensive regulation is directed at those food businesses that present the greatest risk to public health.

Interventions are split into 2 categories- those that are recognised by the European Union as ‘official controls’, and those that are not. Interventions that are official controls include:- inspections; monitoring; surveillance; verification; audit; and sampling (where the analysis is to be carried out by an official laboratory). Other interventions which do not constitute official controls include:- education, advice & coaching provided at a food establishment; and information & intelligence gathering.

The authority will continue to implement a planned programme for food hygiene and food standards interventions and feed inspections at premises within the County Borough. A degree of flexibility will be factored in to allow important issues to be adequately addressed, especially where enforcement action becomes necessary to protect public health.

Food Hygiene

The intervention programme is based on the intervention rating scheme contained in Annex 5 of the Food Law Code of Practice, which means that, dependent on risk, premises should be inspected or subject to a suitable intervention within a range of 6 months to 3 years. In addition, approved product premises require increased intervention frequencies whilst certain low risk premises may at the discretion of the authority be subject to an alternative enforcement regime.

Food Hygiene Interventions will be undertaken in accordance with the guiding themes contained within the Food Hygiene Interventions Procedure, the relevant legislation, Food Law Code of Practice and Practice Guidance and the Industry Guides. Officers will carry out food hygiene interventions to ensure that food meets the requirements of food hygiene and safety law, including microbiological quality; absence of pathogenic micro-organisms; and safety for consumption.

During interventions, competent officers will carry out statutory duties under the relevant legislation, provide advice and information to personnel within food premises and undertake any necessary follow up visits and take formal action where necessary. Particular emphasis will be given to assessing and advising food businesses on the requirement of a documented food safety management system and food hygiene training.

Table 1 (a) below, illustrates the number of programmed interventions programmed going forward, based on their Risk Rated category (Highest Risk premises:- category A premises = 2 interventions per year; category B premises = 1 intervention per year; category C premises = 1 intervention at least 18 monthly. Lowest risk premises:- category D premises = 1 intervention every 2 years; category E premises should be inspected every 3 years or can be subject to an Alternative Enforcement intervention in lieu of inspection). New premises are classed as unrated initially until formally inspected (prior to opening / within 28 days of opening).

Table 1(a) Planned Food Hygiene Interventions due 2016/17 (as at 1st April 2016)

RISK CATEGORY	NUMBER OF PREMISES CARRIED FORWARD	(NUMBER OF PREMISES IN CATEGORY 2016/17)	NUMBER OF NEW INTERVENTIONS DUE / PLANNED 2016/17	TOTAL NUMBER DUE / PLANNED 2016/17	ESTIMATE NUMBER DUE / PLANNED 2017/18
High Risk:-					
A	0	(8)	16	16	<i>e.20</i>
B	0	(51)	51	51	<i>e.60</i>
C	0	(501)	350	350	<i>e.330</i>
Unrated	20	---	---	20	---
Approved Premises	0	(1)	3	3	---
Total	---	---	---	440	<i>e.390</i>
ESTIMATE: New Businesses	---	---	---	Circa e.120 – 150	<i>Circa e.120-150</i>
ESTIMATE: No of premises likely to Cease Trading				Circa e.120 – 150	<i>Circa e.120-150</i>
Low Risk:-					
D	29	(190)	82	[111]*	<i>e.75</i>
E	294	(578)	45	[339]**	<i>e.114</i>

- *In accordance with the Framework Agreement and frequencies set in the Food & Feed Law Code of Practice, Category D premises should receive an intervention every 2 years. Such interventions can alternate between an intervention that is an official control and an intervention that is not an official control. However, where resources are capped, the priority will remain with the Higher Risk categories.
- ** In accordance with the Framework Agreement and frequencies set in the Food & Feed Law Code of Practice, Category E premises should be subject to an intervention every 3 years, which could be part of an Alternative Enforcement Strategy. However, where resources are capped, the priority will remain with the Higher Risk categories.

In addition to the planned interventions above, any newly opened / change of ownership of food premises will be targeted for inspection / an intervention. In 2015/16, there were 190

requests for advice in relation to food premises registration and new food businesses, and a similar figure is estimated for 2016/17.

It is estimated that in addition to the planned primary inspections/interventions to be undertaken, a further 110 food hygiene “revisits” will also be carried out. This detailed involvement with Food Business Operators and their staff is an ideal opportunity to progress Best Practice standards and promote health and well-being in the wider context, as well as ensuring improvements are made.

As a result of the Mandatory Food Hygiene Rating Scheme, we now issue eligible premises with a Hygiene Rating score, and publicise this on the national website: www.food.gov/ratings. As part of the scheme, businesses who initially fail to meet the highest standard (Score of 5), but who subsequently implement improvements are entitled to apply for a re-assessment visit. This has caused an increase in demand for resources to undertake these re-inspections, but due to the importance of implementing the scheme and the need to support businesses going forward, we will prioritise this work area.

Food Standards & Feed Standards

The inspection / intervention programmes are based on the inspection rating scheme contained in Annex 5 of the Food Law Code of Practice and the Feed Law Code of Practice, which means that, dependent on risk, all premises will be scheduled for an inspection or intervention within a range of 12 months to 5 years. Certain low risk premises may, at the discretion of the authority, be inspected via an alternative enforcement regime.

An alternative enforcement strategy has been in place for Low risk rated (Category C) Food Standards premises since 2006.

Feed Standards premises are subject to primary or secondary inspections.

A primary inspection is an inspection of a feed business in which the appropriate elements set out in the relevant inspection form for the business concerned are considered. Authorised officers may, however, use their professional judgment and decide to cover only certain elements where they consider it appropriate to do so.

A secondary inspection is any other visit to a feed business that is not a primary inspection, for any purpose connected with the enforcement of feed law, including:

- Sampling visits
- Visits to check on the progress of measures required after a previous inspection
- Complaints visits
- Visits to discuss aspects of feed safety management procedures based on HACCP principles.

Officers undertaking food and feed standards inspections will ensure that the food or feed business is meeting the legal requirements relating to quality, description, composition, labelling, presentation and advertising of food and of materials or articles in contact with

food. Animal health officers have the responsibility of inspecting the feed hygiene systems on farms, this is carried out as part of their routine animal health inspection.

During inspections /interventions competent officers will carry out statutory duties under the relevant legislation, provide advice and information to personnel within food premises and take formal action where necessary.

Table 1(b) Planned Food Standards Interventions due 2016/17 and estimated for 2017/18:-

CATEGORY	NUMBER OF PREMISES CARRIED FORWARD	(NUMBER OF PREMISES IN CATEGORY 2016/17)	NUMBER OF INTERVENTIONS DUE / PLANNED 2016/17	TOTAL NUMBER DUE / PLANNED 2016/17	ESTIMATED NUMBER OF REVISITS 2016/17	ESTIMATED NUMBER DUE / PLANNED 2017/18
A	0	(10)	10	10	3	8
B	83	(217)	121	121 *	2	125
C	154	(700)	440	440**	5	450
UNRATED	120	(268)	268	268	10	200
TOTAL	357	(1195)	839	839	20	783

* In accordance with the Framework Agreement and frequencies set in the Food & Feed Law Code of Practice, Category B premises should receive an intervention. Such interventions can alternate between an intervention that is an official control and an intervention that is not an official control. However, where resources are capped, the priority will remain with category “A” businesses and unrated.

** In accordance with the Framework Agreement and frequencies set in the Food & Feed Law Code of Practice, Category C premises should be subject to an intervention every 5 years, which could be part of an Alternative Enforcement Strategy. However, where resources are capped, the priority will remain with the higher and unrated risk categories.

Table 1(c) Planned Feed Standards Interventions due 2016/17 and estimated for 2017/18: (Feed is now co-ordinated on a regional basis, inspections numbers are dictated by the level of funding from the Food Standards Agency) -

CATEGORY	NUMBER OF PREMISES CARRIED FORWARD	(NUMBER OF PREMISES IN CATEGORY 2016/17)	NUMBER OF INTERVENTIONS DUE / PLANNED 2016/17	TOTAL NUMBER DUE / PLANNED 2016/17	ESTIMATED NUMBER OF REVISITS 2016/17	ESTIMATED NUMBER DUE / PLANNED 2017/18
A	0	(5)	5	5	0	5
B		(8)	8	8	2	2
C	0	(6)	0	0	0	1
D	0	(8)	2	2	0	2
E	0	(220)	20	20	0	25
UNRATED	36	(4)	36	36	2	20
TOTAL	0	(251)	71	71	4	55

3.1.2 Premises Profile

The authority currently has circa 1433 food premises and approximately 354 feed businesses (mainly farms) trading in the borough (of which circa 1349 food businesses are registered by NPTCBC, the remainder are registered elsewhere, but can trade with NPT). There are many in-year changes to the number and type of premises which are active at any one time. The majority of the premises are situated in and around the main towns of Neath and Port Talbot. Additionally, there are several industrial estates containing food premises, which include a number of food storage/distribution units (see Appendix D for numbers of premises by Ward area).

The following tables illustrates the type and number of food & feed premises within the authority. There has been a significant increase in the number of feed premises as more have been detected, all premises that supply feed that is given to animals that go into the food chain are caught by the legislation.

Table 2a: Types of premises: 2013- onwards.

TYPE OF PREMISES (FOOD)	NO. OF PREMISES (2013/14)	NO. OF PREMISES (2014/15)	NO. OF PREMISES (2015/16)	NO. OF PREMISES (2016/17)
Primary Producer [F01]	7	4	2	1
Manufacturer / Packer [F02]	22	20	23	24
Importers / Exporters (EU) [F03]	0	0	0	0
Distributor / Transporter [F04]	18	17	19	15
Supermarket/Hypermarket [F05]	47	46	47	42
Small Retailer [F06]	255	250	247	243
Retailer / Other [F07]	49	48	52	53
Restaurant/Café/Canteen [F08]	183	182	186	192
Hotel/Guest House [F09]	18	17	19	18
Pub/Club [F10]	218	217	215	203
Takeaway [F11]	140	139	146	147
Caring Premises [F12]	212	210	217	211
School/College [F13]	101	101	101	95
Mobile Food Unit [F14]	49	45	52	55
Restaurants & Caterers – Other [F15]	113	113	118	132
Importers/Exporters (3 rd Countries) [F16]	0	0	2	2
TOTAL NO. OF PREMISES	1432	1409	1446	1433

TYPE OF PREMISES (FEED)	NO. OF PREMISES (2013/14)	NO. OF PREMISES (2014/15)	NO. OF PREMISES (2015/16)	NO. OF PREMISES (2016/17)
Primary Producer [A01]	30	31	31	See new chart below for breakdown in accordance
Livestock Farms [A02]	219	219	219	
Manufacturers & Packers [A03]	7	7	7	
Food businesses selling co products [A04]	11	13	13	

Importers (Non EU) [A05]	0	0	0	with latest classifications
Distributors / Transporters [A06]	2	2	2	
Stores [A07]	0	0	0	
Retailers [A08]	6	6	6	
TOTAL NO. OF PREMISES	275	278	278	

Ongoing feed work has led to a detection of more premises that require feed registration.

	Animal Feed Revised Coding 2016/17	No. of PREMISES
A	Manufacturer Using / containing additives	2
B	Manufacturer Not Using Additives	3
D	On Farm Mixer Using Additives	1
E	Store - In Region Distribution	3
I	Importer - Out Of Region Distribution	1
J	Surplus Food Supplier	12
P	Co Product Producer - In Region	2
S	Livestock Farm	275
T	Arable farm	17
U	Any Other Business	1
X	Not Known	1
	Total Number of Premises:	321

3.1.3 Resources For Inspections / Interventions

Food Hygiene

The Environmental Health & Trading Standard service was restructured in April 2016 resulting in a team based on 1.0 Team Leader; 0.8 Senior EHO; 5.03 EHO's; 1.85 Enforcement Officers; 1.0 Enforcement Officer (currently Training), and 0.33 Support Officer. This equates to approx 10.0 FTE (Full Time Equivalents)- see breakdown in table below for fuller details. It is estimated that the required resource to deliver all aspects of the Framework Agreement and Code of Practice is 12.0 FTE. It is anticipated that the current combined staffing level is sufficient to carry out most of the prioritised areas of work, including the foreseeable (planned) inspection programme at High Risk premises. However, temporary staff and locums/contractors have also been utilised in previous years to support the service, when additional resources have been needed. Some flexibility is maintained from the cross-utilisation of staff from and to other parts of the service (see Chapter 4 on Resources for fuller details on the current staffing structure). One member of the team is currently training towards their Higher Certificate in Food Safety and Legislation qualification.

Food Hygiene Resources- Required and Allocated.

	Estimate of Required Resources	Allocated	Relative priority assigned
Food hygiene inspections: Cat A-C	3.8	3.8	High / Medium-high
Food hygiene inspections: Cat D	0.6	0.0	Medium-low
Food hygiene inspections: Cat E	0.4	0.0	Low
Food hygiene Complaints	1.3	1.2	High / Medium-high
Food hygiene Sampling	0.2	0.2	Medium
FH New Businesses & Compulsory Registrations	1.9	1.5	Medium-high
FH Advice & Promotional work	0.3	0.3	Medium / Medium-low
FH Revisits	0.6	0.6	Medium-high
FH Rating Scheme Re-Rating visits	0.2	0.2	High
FH Rating Scheme enforcement	0.1	0.0	Resources diverted when required.
FH Prosecutions	0.1	0.0	Resources diverted when required.
Food Fraud investigations and surveillance	0.1	0.0	Resources diverted when required.
Food hygiene Unrated inspections & work carried forward.	0.2	0.1	Medium
Food Related Infectious Disease control, inc food poisoning cases & outbreaks	1.0	1.0	High
Food hygiene Approved Premises	0.1	0.1	High
FH Import & Export; & Novel foods	None at present	0.0	Resources diverted when required.
FH Service Improvement (Monitoring, Planning, Reviews, Policies, Consultations,	0.8	0.7	High / Medium-high
Food hygiene safety alerts	0.1	0.1	Medium
Other Food hygiene work	0.2	0.2	Resources diverted when required.
TOTALS (in FTE's):	12.0	10.0	

Food Standards and Feeding stuffs

The Retail and Industrial enforcement section of trading standards consists of 2.0 Trading Standards Officers , and 3.0 Enforcement Officers (one of which is currently studying to become a TSO) who conduct food inspections/ interventions as a core part of their work alongside other duties. The department has recently been restructured to include an Assistant Enforcement Officer whose duties include unofficial food controls. All feed enforcement officers are HACCP trained. The 2 trading standards officers and 1 of the enforcement officers have non primary producer/farm inspection duties. Inspection of feed on farms is the responsibility of another enforcement officer and the assistant enforcement officer. All officers are suitably qualified and deemed competent, and carry out the assessments on an annual basis. The proportion of time spent on each officer on the feed and food function can be found in part 4 (Resources) of this document.

Food Standards Function	Estimate of Required Resources	Allocated
Food Standards Interventions	2.1	1.0
Food Standards Complaints	0.2	0.2
Food Standards Home Authority / Primary Authority	0.3	0.2
Food Standards Business Advice	0.3	0.2
Food Standards Sampling / Incidents	0.2	0.2
Food Hygiene Primary Production Inspections	0.1	0.1
Liaison & Promotion	0.1	0.1
Food & Feed safety alerts	0.2	0.2
Sub-Total	3.5	2.2
<i>Recovery of Backlog of Food Standards Work (short term: 2 years approx)</i>	2.1	0.0

Currently the department devotes 2.2 Full Time Equivalent officers to food standards enforcement work.

At current intervention rates, to achieve inspections targets as per the code of practice (that is, inspection of A, B, C rated and Unrated businesses) and taking into account complaints and sampling work, the department would need to increase the number of full time equivalent qualified and competent officers to approximately 5.6 to overcome the backlog, particularly unrated businesses, in a reasonable period of time (estimated as two years). Currently, unrated businesses are subject to a mailed or e-mailed self assessment questionnaire. Using the responses and the information gathered from the food registration

documentation, businesses are prioritised. For example an unrated food manufacturer will be visited before an unrated retailer selling prepacked, long life, food.

To then maintain the inspection rate the department would need to maintain 3.5 FTE food officers.

Feed work provisions are now arranged regionally and funded directly by the Food Standards Agency.

3.1.4 Targets and Priorities For 2016/17 (including any planned projects)

Food Hygiene:

1. To ensure a high level of Business compliance with Food Hygiene legislation. This is illustrated by the percentage of food businesses which are classed as “Broadly Compliant” when assessed against the definition provided by the National PI / Public Accountability Measure (PAM): PPN/009 “The percentage of food establishments which are ‘broadly compliant’ with food hygiene standards”;
2. To undertake a suitable variety of Regulatory Interventions to promote good health and ensure legal compliance to avoid dangerous health risks. This will include the issuing and administration of the Mandatory Food Hygiene Rating Scheme which was introduced on 28th November 2013;
3. To undertake inspections / interventions at high risk premises for food hygiene. (See tables 1(a) and (b) for number of inspections due). [This was formerly a National PI: PPN/001 (ii); until deleted after 2010/11. It is currently monitored as a Background PI & remains a Council KPI]. This PI is based on doing 100% of Category A premises; and 100% of Category B premises. With respect of Category C premises, interventions will be part of a risk based strategy.
4. To inspect or otherwise assess new businesses for compliance with legal standards, whilst being aware of the likely needs of new businesses to require timely advice, tailored to their undertaking at the planning and “startup” stages. [This was formerly a National PI: PPN/008; until deleted after 2010-2011. It is currently monitored as a Background PI & remains a Council KPI].
5. To respond to infectious disease incidents, complaints and enquiries within the target response time laid down by the Authority.
6. To promote the improved understanding and implementation of food safety management systems for food businesses in the County Borough.

Food Standards and Feeding stuffs

1. To undertake a suitable level and variety of Regulatory interventions to promote food and feed safety from farm to fork and to ensure legal compliance and promote fair competition and trading.
2. To achieve 100% of inspections/interventions of “A” rated premises for food standards & feed purposes
3. To inspect or otherwise assess unrated businesses for compliance with legal standards.
4. To assess businesses for compliance with basic legal standards, to ensure that significant breaches are acted upon and proper controls are evenly applied to all businesses in a fair and equitable manner. [This was formerly a National PI: PPN/007, until deleted after 2010/11. It is currently monitored as a Background PI & remains a Council KPI].
5. To complete the annual food sampling plan, including the cross border regional projects it has embarked upon.
6. To complete the regional feed delivery plan
7. To continue to implement the Intelligence Operating model across the service.
8. To maintain competency and training for all relevant staff.

3.1.5 Possible Restrictions on Providing Service

Staffing levels remain tight, and are already prioritised on key areas of work. Extended periods of staff absence can cause acute staffing problems, however this issue is constantly monitored. Due to the wide variety of other work undertaken by these officers, they will need to maintain their competencies in a variety of disciplines to remain flexible and of optimum value when emergencies occur.

The section has had little turnover of food and feed qualified personnel in the last two years. When a member of staff does leave, it is often difficult to replace them due to the restricted availability of suitably qualified officers. The section has a wide remit and although food and feed standards work is of a high priority, occasionally, projects and targets need to be re-assessed to focus on the areas of greatest need. Restructures and conflicting demands on the department have meant new staff have been drafted in to work on areas that they are not familiar with. In the past the department has needed to utilise the services of locums/contractors to cover the short term deficits, however, this is an option that has become less available to the service, due to tightening budgetary constraints. To overcome this the department is focussing on the areas which require most attention and making use of the intelligence led approach advocated by National Trading Standards and have implemented the Intelligence Operating Model for Trading Standards

3.1.6 Experience of Officers and Access to Expert Information When Necessary

All relevant officers within the Section are appropriately qualified and experienced to deal with routine and many unusual matters associated with all current types of food & feed premises within the area.

Additional training will be given to staff as and when considered necessary, e.g. if a new business sets up and has a specialised process of which staff have not had previous experience.

Staff also have access to relevant environmental health and trading standards literature, the Internet, Technical Indexes, Knowledge Hub etc. They also have access to representatives of coordinating groups and panels specialising in food and feed enforcement and the authorities public analyst.

Staff can quickly liaise with other authorities via emails, using the EHC-net (Environmental Health Confidential Network), TSI Link (Trading Standards Interlink system) the Knowledge Hub and for Trading Standards via the Regional Intelligence Analyst and intelligence database. Where additional expertise is required the Head of Service will be briefed and a suitable response will be formulated. Where appropriate, assistance from the Food Standards Agency and other partners/colleagues may also be sought.

Trading Standards has representation on the Glamorgan regional coordinating groups for food standards. The section participates in surveys and exercises held under the auspices of the Glamorgan Group, the Welsh Heads of Trading Standards (WHOTS) and the Food Standards Agency. Swansea Trading Standards represent Neath Port Talbot's interests for regional feed coordination. Regular communication takes place between the two authorities on feed issues and delivery of feed enforcement across the Swansea / Neath Port Talbot region.

The sections work closely and liaise with the Public Health Laboratory, Public Health team of the NPHS, and the Public Analysts when expertise is required. The Authority's public analyst service is consulted during the drafting of the sampling programme for sampling subjects, costs and sampling techniques.

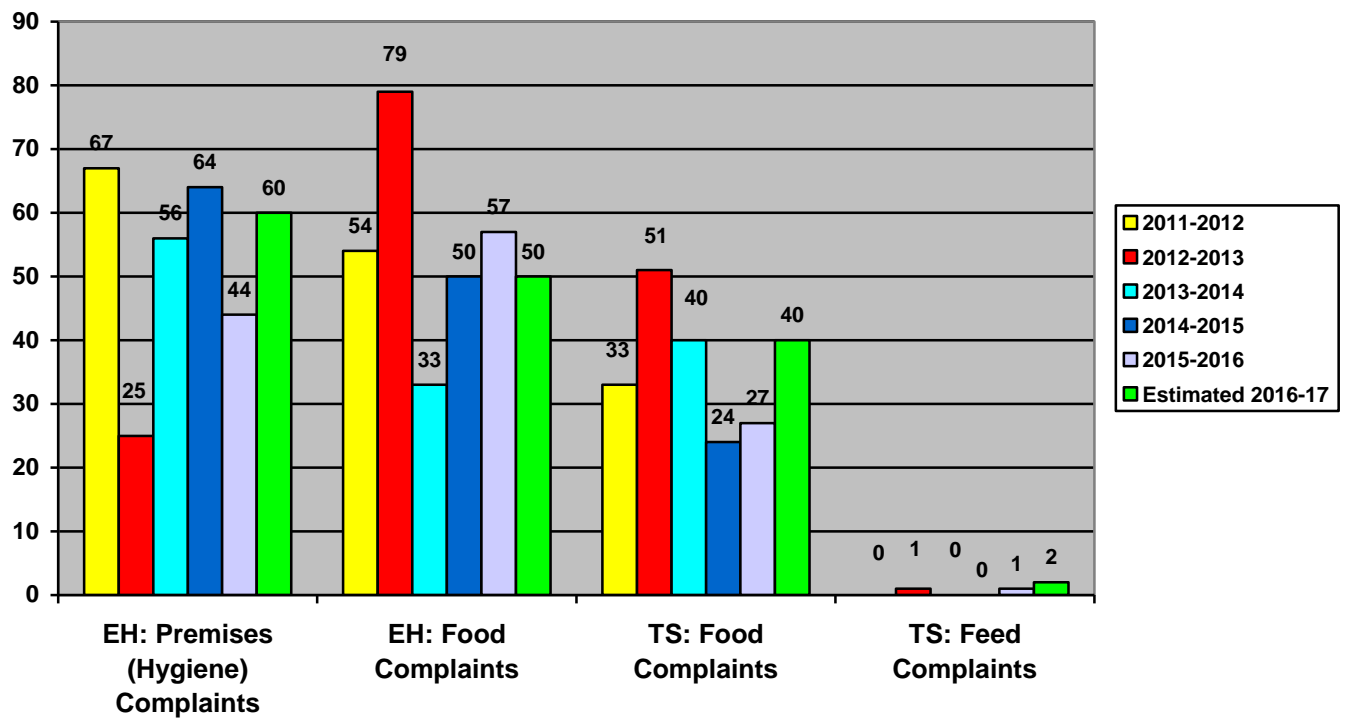
3.2 Food and Feeding stuff Complaints

The authority will continue to ensure that all notified complaints in relation to food and feeding stuffs are suitably investigated and dealt with promptly and consistently. Environmental Health & Trading Standards follow their internal procedures in relation to food and feed complaints, in addition to the food safety policy and internal performance targets.

The following graph shows the actual number of complaints received for 2011/2012 through to 2015/2016, with an estimate for 2016/2017.

Table 3: Food Complaints

Food & Feed Complaints



The reactive workload is equivalent to approximately 1.5 FTE- based on 1.2 FTE for food hygiene and 0.3 FTE for food standards and feeding stuffs.

The demands placed on this Reactive service are periodically reviewed, to ensure that resources for investigating food complaints are targeted on a risk basis. The available resources will need to be focused on significant food safety risks, to ensure the widest possible protection of public health. As a consequence, certain categories of service request may need to receive a much more streamlined response.

3.3 Primary Authority Scheme & Home Authority Principle

The authority will continue to provide advice and assistance to food businesses for which we are home authority and/or originating authority and to any that may set up their decision making centre within the authority, in line with our Primary Authority Policy (including any businesses which may wish to develop a relationship under the Primary Authority scheme). We will provide any relevant information to other food authorities that make enquiries about such businesses.

The Primary Authority scheme requires UK enforcement authorities to be mindful of national inspection plans organised with multi-site businesses, to ensure consistency of approach on a nationally coordinated basis (See also our Enforcement Policy and Primary Authority Policy). Any potential enforcement action would similarly need to be coordinated with the Primary Authority of the business involved. Details of the scheme and participating partners are maintained by the Governments' Regulatory Delivery department . A national / regional / multi-site business can establish a primary authority relationship with any appropriate local authority for a specific function (Food Hygiene, Food Standards etc.)

Additionally, the “Home Authority Principle” is followed by officers when investigating food & feed complaints, where the product in question has been produced or manufactured in another part of the UK- liaison is instigated with the relevant local authority / authorities. Increasingly, food is imported from Countries within the European Community and other parts of the world. Where problems are discovered, investigations are coordinated through the Food Standards Agency and any relevant border inspection points / ports.

3.4 Advice to Businesses

The authority will continue to provide relevant advice and assistance to existing and prospective businesses within the area. In 2015/2016, 21 food standards requests for advice and 196 food hygiene enquiries were received, requiring advice on various food matters. It is estimated a similar number of enquiries will be received in 2016/17.

Advice is provided to businesses in the following ways.

1. During inspections and as part of follow up documentation;
2. Via mail drops e.g. food alerts, information leaflets/letters,
3. Startup advice on request;
4. New business questionnaires
5. Via social media (i.e. Facebook / Twitter)
6. Through guidance information available on the Council's website
7. Distribution of relevant food safety material to food businesses;
8. Seminars for businesses and training/awareness events;
9. Press releases and media campaigns

The existing resources within the department should be able to meet the estimated number of enquiries.

3.5 Food and Feed Sampling

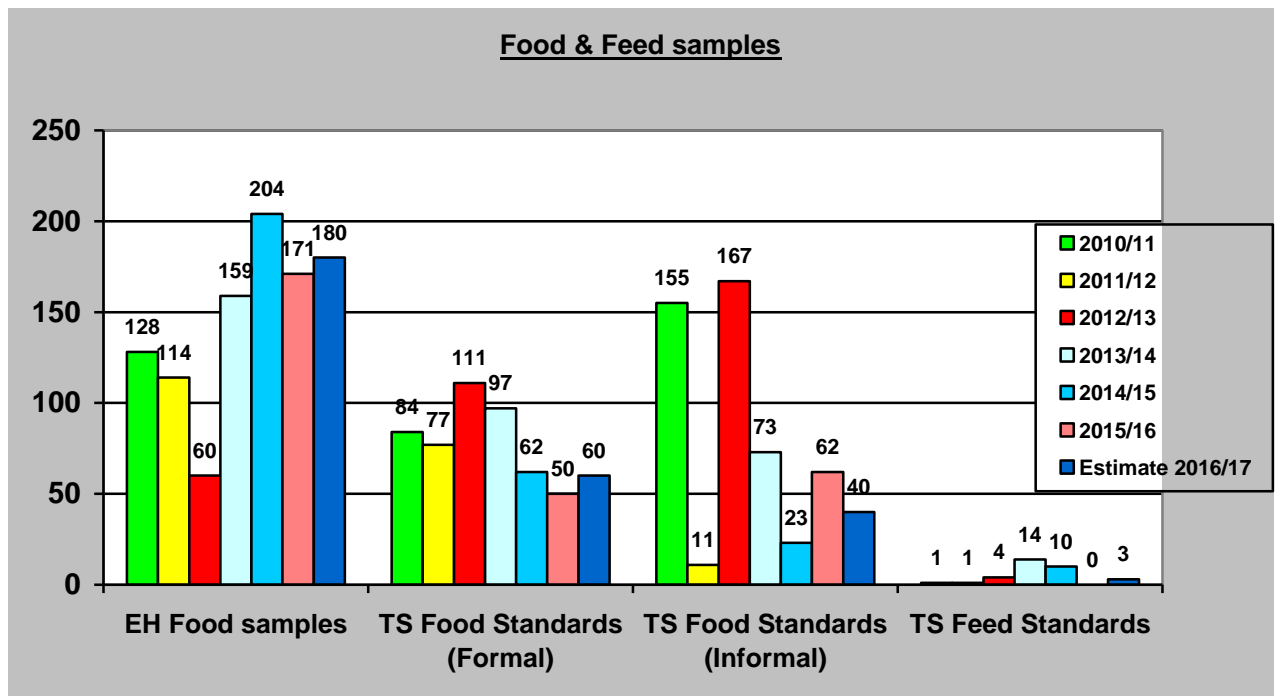
The Authority believes that sampling is integral to food and feed law enforcement. The sampling policy has been drafted for the following purposes:

- Protecting public health
- Detecting and deterring fraudulent activities
- Verifying that official control checks are effective
- Giving customer's sufficient information to make informed choices
- Ensuring that food standards are maintained
- Informing the enforcement approach
- Providing product quality advice to the producer
- Promoting fair trade and deterring bad practice

Food sampling trends and intelligence are examined and informs the authority's food sampling plan. Priority areas for sampling are identified on the basis of safety, consumer or trade detriment, type of food or feed business and risk. Additionally, food samples can be taken as part of a programmed intervention if deemed appropriate or in connection with enforcement investigations.

The Authority is encouraged to participate in various co-ordinated sampling programmes such as the Welsh Food Microbiological Forum targeted surveys; the All Wales 'Shopping Basket' Food Sampling Survey; Welsh Head of Trading Standards Surveys; Glamorgan Trading Standards Group Surveys; public analysts co-ordinated surveys; Food Standards Agency surveys and the FSA food & feed priorities.

Following the implementation of regional food standards and feed enforcement across Wales, there are now regionally led food and feed sampling programmes directly funded by the FSA which Neath Port Talbot will be participating in. Other internal sampling programmes can be carried out as and when necessary and are incorporated into the annual plan of food sampling devised respectively by Environmental Health and Trading Standards. Food sampling has dropped considerably, as most of our current food work has been proactively advising businesses on the provisions of the new Food Information Regulations.



Resource allocation:- approximately 3 days a month are spent by one officer (usually a Support Officer) sampling foods for microbiological analysis and undertaking the subsequent administration. Samples taken are submitted to either the local Microbiology testing laboratory (PHW- lab) or Public Analyst within 24 hours of sampling. A similar amount of time is spent by Trading Standards staff on sampling with samples submitted weekly to the Public Analyst.

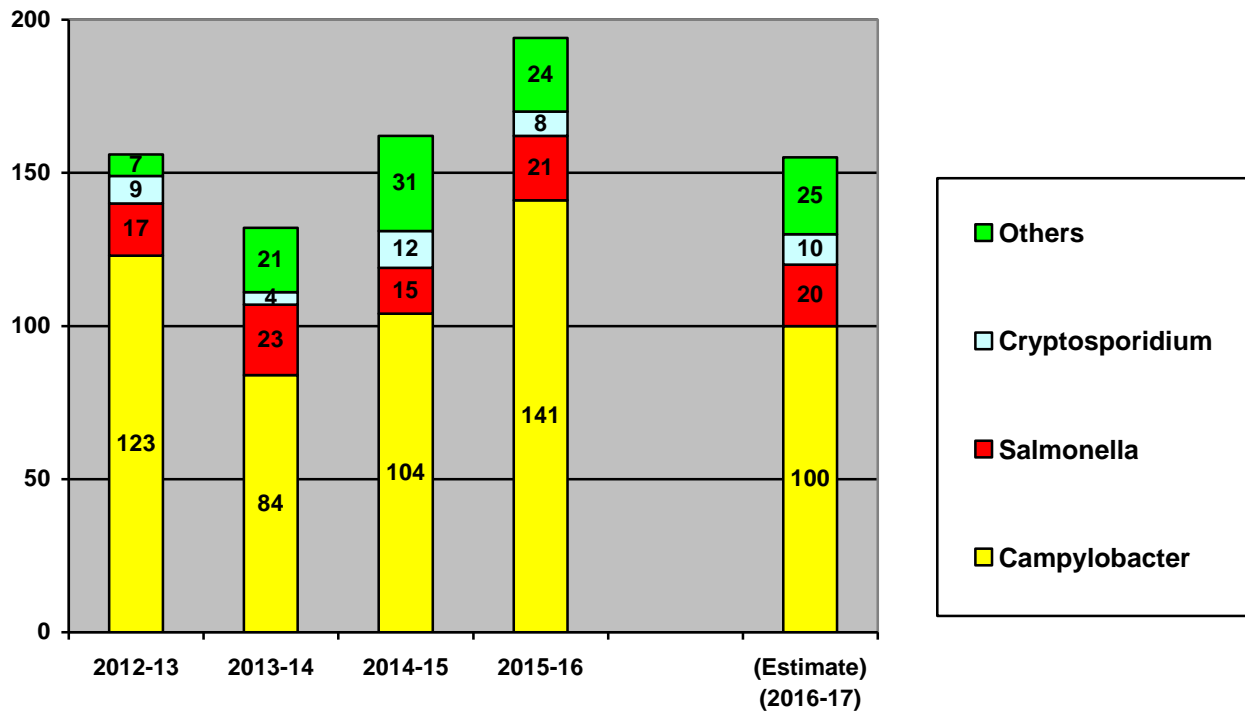
3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

All formal notifications (of all types of Infectious Disease notifications) are recorded in the Infectious Disease Register. Subsequent investigations are based on the type of organism, the number of cases, and are in accordance with the over-arching Communicable Disease Outbreak Control Plan for Wales (re-issued September 2012 by Chief Medical Officer- Wales). Additionally, there are various supporting infectious disease investigation procedures utilised locally by Neath Port Talbot. During 2015/16, we received 194 infectious disease notifications (141 of these were Campylobacter; 21 were of Salmonella; 8 were of Cryptosporidium; and 24 “others”). Periodically, we receive complaints from members of the public as self-referrals. These are often reported as suspected cases of food poisoning. Initially, advice is given for the case to report to their GP, but invariably these are followed up as service requests and investigated accordingly. They are also reported to the NPT Consultant in Communicable Disease Control. Workloads are consistently high in this area of work, and where Emergencies / Major Outbreaks occur, they are dealt with as top priority, with other work being re-scheduled.

The existing resources within the department will be able to cope with the estimated number of food poisoning cases, as each inspecting officer also deals with reactive work. This work

forms part of the reactive workload which is estimated to be equivalent to approximately 1.5 FTE.

Graph to show Notifications of all Infectious Diseases, including Food-related



3.7 Food (& Feed) Safety Incidents

The service has a documented procedure which deals with action to be taken following the receipt or initiation of a food alert.

The current Code of Practice require specific recording of actions taken following the receipt of a food or feed alert.

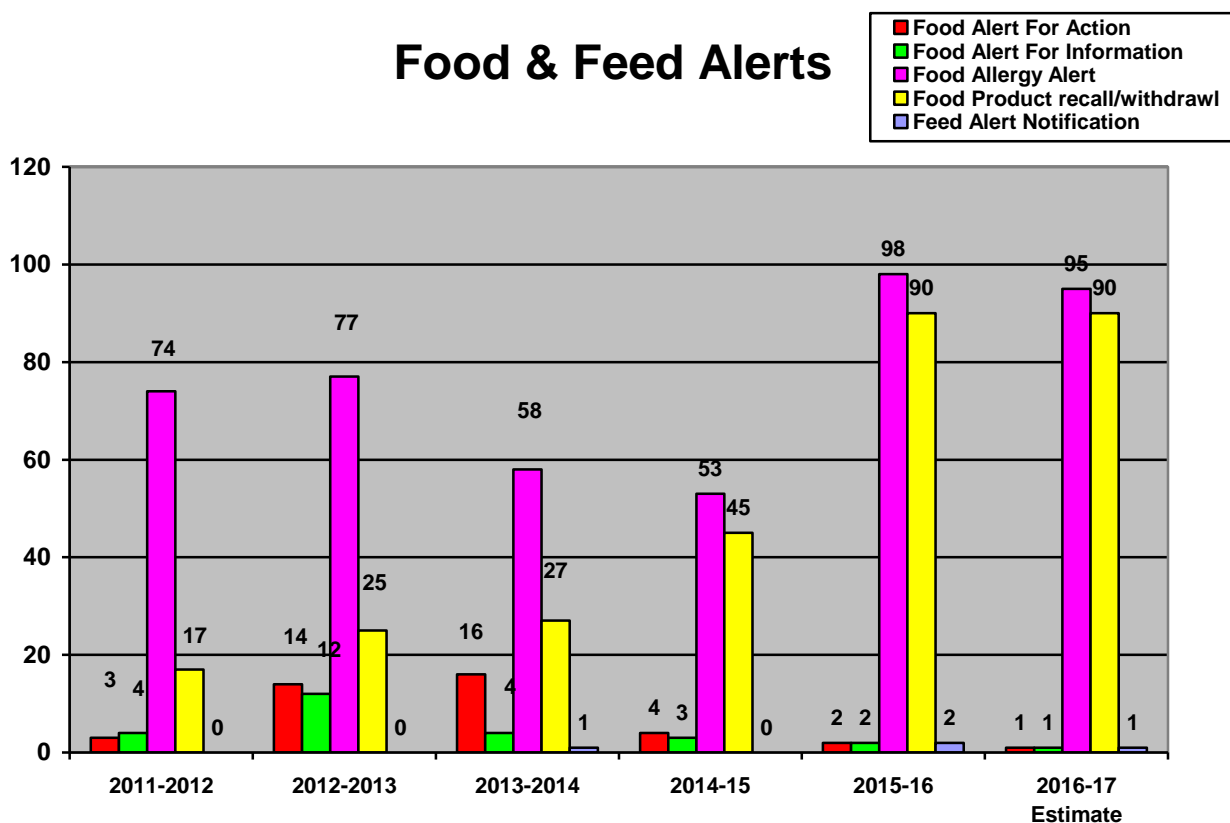
Alerts are received by a direct email from the Food Standards Agency Wales (FSA-W) to enforcement officers. The warning procedure for food incidents recognises that Alerts for Action (FAFA) are required to be dealt with quickly, and are treated as a very high priority- which often take priority over other work of the sections. More often, Food Alerts for Information are issued. Most food alert warnings received require only a small amount of officer resource. However on occasions it will be necessary to provide more resources to deal with onerous alerts.

Businesses in the area will be encouraged to withdraw affected products from sale or supply. Initially requests will seek compliance through voluntary co-operation, however formal enforcement procedures exist to ensure an appropriate response. If a food complaint or related matter being investigated by an officer of this authority has possible widespread

implications, the Food Standards Agency Wales and other relevant agencies will be contacted immediately via the applicable Food Incident report form/ mechanisms.

Any actions taken following receipt of a food alert are recorded on the ‘Authority Public Protection’ (APP) database system used by this authority.

During 2015/16, a total of 193 Food/Feed Alerts were received, of which 1 was classed as a FAFA (Food Alert- For Action); 2 alerts were classed as FAFI (Food Alert- For Information); 98 were classed as Food Allergy Alerts; and the department also received 90 Food Product Recall / Withdrawal Alerts. There were 2 Feed Alert Notifications. Recent numbers and trends are detailed in the graph below, and an estimate for 2016/17 is given.



There is always a significant number of allergy alerts, however few of these require action on the part of the food authority. The existing resources within the department will be able to cope with the estimated number of food alerts / food incidents, as each inspecting officer also deals with reactive work. This work forms part of the reactive workload which is estimated to be equivalent to approximately 1.5 FTE.

Neath Port Talbot issued its first feed alert in February 2015 following salmonella contamination in dog food. This only affected the local area and the product was successfully withdrawn and destroyed.

3.8 Liaison with other Organisations

The authority has a number of arrangements to ensure enforcement action is consistent with neighbouring local authorities. Officers participate in a variety of external liaison groups, which are summarised below:

Table: 4 Breakdown of resource allocation for liaison with other organisations.

GROUP	AVERAGE RESOURCE ALLOCATION	
TS Glamorgan Food Group	4 days per year	1 Officer
TS NPT/Swansea Feed Region	4 days per year	1 Officer
TS Glamorgan Group	4 days per year	1 Officer
WHoTS Animal Health and Welfare Panel	4 days per year	1 Officer
WHOTS Group	6 days per year	1 Officer
WHoEHG Food Safety (Task Group & Technical Panel)	4 days per year	1 Officer
WHoEHG Communicable Disease (Task Group & Technical Panel)	4 days per year	1 Officer
WHoEHG: Environmental Health Group	4 days per year	1 Officer
Welsh Food Microbiological Forum	3 days per year	1 Officer
Meetings with CCDC	Estimate 2 days per year	1 Officer
Consultee to Building Control & Planning Department & Licensing Department.	Estimate 2 consultations per week	1 Officer
Regulatory Delivery	Estimate 2 days per year	2 Officers (HJ & LEW)
Welsh Food Fraud Coordination Unit	Estimate 2 days per year	2 Officers (HJ & LEW)
National Food Crime Unit	Estimate 2 days per year	2 Officers (HJ & LEW)
Ad hoc meetings with NPTCBC Education and Social Services Departments	4 days per year	1 Officer
Key: WHoTS = Welsh Heads of Trading Standards. WHoEHG = Welsh Heads of Environmental Health Group CCDC = Consultant in Communicable Diseases APP = Authority Public Protection (computer database package) SHIP = Strategic Health Improvement Partnership		

3.9 Food and Feed Safety and Standards Promotion / Intelligence Gathering

Educational and promotional activities are considered to be important aspects in the delivery of a comprehensive food safety service.

Promotion of food safety issues is achieved in the following ways:

- Food information available directly from the Food Safety section & Trading Standards section of the Council and via their websites.
- Attending consumer education events, and disseminating information on the work of the department, including food and feed standards work.
- Liaison with NPTCBC Procurement and Care services in respect of food issues and specifications of food supplied to Neath Port Talbot.
- Targeted advice/information sent to relevant groups on issues of county or national significance.
- Active promotion of National Food Safety Week (e.g. through displays in the Local Shopping Centres, or through social media, or amongst local groups/communities).
- Arranging and conducting hand washing demonstrations in conjunction with local schools. Also, we facilitate presentations/talks to pupils of local educational establishments including schools, colleges, universities and voluntary groups, when requested.
- Targeted seminars and training sessions can be provided on subjects such as Food Safety Management System requirements- particularly aimed at high risk caterers, or high risk food sectors.
- Food hygiene courses can be offered by the service for external and internal candidates.
- Use of local intelligence liaison officer and regional intelligence analyst (RIA)
- Attendance and membership of regional feed and food liaison groups.

The authority will continue to promote food safety and standards in all areas of its work. Most inspections are carried out pro-actively and include an element of the promotion of “best practices” by officers to ensure premises achieve good practices over and above the basic compliance of relevant legislation. Prospective business owners will be positively encouraged to seek the advice of the department before the food business opens to prevent possible food hygiene and standards contraventions from occurring.

Wherever possible evaluation of the effectiveness of environmental health interventions is assessed- primarily by the use of feedback forms, including training course evaluation forms.

Part of the health promotion function, which deals with Businesses, is integrated within the food service delivery team. Although there is no specific staffing resource allocated to this function, the daily contacts which the Teams have with businesses are an important opportunity to positively influence the wider business community, their employed staff and customers.

Intelligence is served via the authorities APP/Flare database system. In addition, the Knowledge Hub (reference site), TSlint (reference site), FSSinet (food sampling system) and EHC net provide means of informal data and intelligence sharing, whilst more formal means are provided by the Memex system, and via the authorities intelligence officer – who sits in the Trading Standards Fraud team, the Regional Intelligence Analyst funded by money administered by the National Trading Standards Board based in Newport and the Food Fraud Unit based in Ceredigion.

4.0 RESOURCES

4.1 Financial Allocation

The table below provides a summary of actual expenditure and income for the Food Service.

Budget Figures

Revenue Budget	Budget 2016/17 £
Expenditure	
Staffing- Food Hygiene	391,117
Staffing- Infectious Disease	47,505
Staffing- Food Standards	68086.7
Staffing- Animal Feeding Stuffs	26657.3
Transport (TS)	5,016
Equipment	2,560
Legal Fees – Trading Standards	800
Sampling & Analysis – Food Hygiene	260
Sampling and Analysis – Trading Standards – Food & Feed only	9,000
Total Expenditure	551,616
Income	
Government Grant	0
Other Income	6,030
Total Income	6,030
Net Expenditure	563,676

4.2 Staffing Allocation (estimates)

Food Hygiene: All EHO's currently in post have either the B.Sc. (Hons) degree, M.Sc. or diploma in Environmental Health and are approved by EHORB (Environmental Health Officers Registration Board). Two Enforcement Officers hold the Higher Certificate in Food Premises Inspection, and another is currently training. Table 6a below illustrates the FTE number of staff working on food hygiene law enforcement (food hygiene and associated matters) including support staff and their relevant competencies as per the Code of Practice.

Table 6a - as at 1/4/2016

	EHORB (EHO)	EHORB (Higher Risk premises)	Non EHORB (Support Staff)
Team Leader (F&HP)	1.0		
Senior EHO (F&HP)	0.8		
EHO (F&HP)	5.03		
Enforcement Officer		1.85	
Enforcement Officer (Training)			1.0
Support Officer			0.33 approx.
Total as at 2016-04-01	6.83	1.85	1.33 approx.
<i>Total as at 2015-04-01</i>	<i>5.2</i>	<i>1.0</i>	<i>3.9</i>
<i>Total as at 2014-04-01</i>	<i>5.1</i>	<i>1.0</i>	<i>3.0</i>
<i>Total as at 2013-04-01</i>	<i>3.8</i>	<i>0.4</i>	<i>1.5</i>

Food Standards & Feed Standards: The 2.0 Trading Standards Officers undertaking food standards work hold the Diploma in Trading Standards or one of its antecedents necessary to allow officers to undertake food & feed standards inspections One enforcement officer holds the Diploma in Consumer Affairs (DCA) together with the Food and Agricultural Standards paper, and another Enforcement Officer holds the Diploma in Consumer and Trading Standards (DCATS) Food qualification (See Table 6b).

Table 6b - as at 1/4/2016

Food Standards	DTS	DCA	DCATS Qualified	(Unqualified)
TS Team Leader	0.2			
TSO	1.0			
Enforcement Officer		0.4	0.4	
Assistant Enforcement Officer				0.1

Admin				0.1
Total as at 2016-04-01	1.2	0.4	0.4	0.2
<i>Total as at 2015-04-01</i>	<i>1.5</i>	<i>0.3</i>	<i>0.3</i>	<i>0.8</i>
<i>Total as at 2014-04-01</i>	<i>1.5</i>	<i>0.3</i>	<i>0.3</i>	<i>0.8</i>
<i>Total as at 2013-04-01</i>	<i>1.2</i>	<i>0.3</i>	<i>0.3</i>	<i>0.8</i>
Feed	DTS	DCA	DCATS Qualified	(Unqualified but Competent)
TS Team Leader	0.1			
TSO	0.1			
Enforcement Officer		0.2		0.5
Assistant Enforcement Officer	0	0	0	0
Admin				0.1
Total as at 2016-04-01	0.3	0.4	0.0	0.5
<i>Total as at 2015-04-01</i>	<i>0.3</i>	<i>0.1</i>	<i>0.0</i>	<i>1.0</i>

For staffing structure see Appendix C

4.3 Staff Development Plan

The department is committed to providing appropriate training for staff. A training and development plan is in place for the Environmental Health and Trading Standards Service. All food & feed enforcement staff participate in one-to-one supervisory review with a manager approximately every 6-9 weeks and an annual appraisal. Regular Food Hygiene Team meetings are held to discuss ongoing food and communicable disease issues. Trading Standards hold fortnightly briefing sessions to update staff on new developments in the field, business plan progress and administration issues.

The training and development budget for 2016/17 for the whole of the EH & TS service is initially set at £ 9,800.

The Authority participates in the All-Wales Communicable Disease Lead Officer Training events funded by the Wales Centre for Health. All-Wales update training on food related topics is also provided by the Food Standards Agency on key issues, but is of necessity restricted to usually 2 officers per local authority, and is often free. Officers are expected to maintain their competencies, and undertake to ensure their continuing professional development (CPD) by undertaking suitable study or training equivalent to a minimum of 20

Hours per annum (from 1st January, annually). This is monitored by the respective service managers and discussed during the one to one reviews. There is considerable reliance placed upon the Food Standards Agency for external training in respect of food and feed standards matters.

4.4 Legal Expenditure

Legal fees for food standards and food hygiene cases have remained fairly constant over the past few years. Resources are provided as needed from both the commissioning directorate and Corporate legal services, and costs incurred by both are applied for at the conclusion of the legal action- where there is an overspend/shortfall in resource, this is reported to the Head Of Service for subsidising on an ah-hoc basis, or from central reserves. There has been a moderate rise within food standards of cases referred for prosecution as significant infringements have been detected. This is likely to continue to persist over the coming years with continued infringement of allergen, adulteration and misdescription legislation within Neath Port Talbot.

5.0 QUALITY ASSESSMENT

- 5.1 The quality of the food service will be regularly assessed to ensure the Service Delivery Plan and Food Standards Agency framework agreement on local authority enforcement ('The Framework Agreement Standard') is being achieved.

Management monitoring

Evaluation methods to be used will include:

- Monitoring of inspections by Senior EH officers and EH & TS Team Leaders.
- Monitoring of inspection reports and records.
- Officer reviews held every 6-9 weeks, plus an annual appraisal, which includes a competency assessment for food and feed enforcement as appropriate.
- Accompanied visits and Peer assessments- following internal protocols.

These evaluations are recorded.

The service has also participated in a benchmarking exercise with other Welsh authorities, which was undertaken by the Food Safety Technical Panel in conjunction with the local government benchmarking reference centre. It is anticipated that similar exercises will be repeated every 5 years in the future. Additionally, the Food Standards Agency has discretion to undertake audits (full or focussed) of food authorities, and their latest full assessment was undertaken in 2014.

6.0 REVIEW

6.1 Review Against Service Plan

6.1.1 Food Hygiene

Strategically, the Head of Service and the Environmental Health & Trading Standards Manager have overall responsibility for the direction and performance of the service. The Environmental Health & Trading Standards Manager is the Accountable Manager for the food hygiene function. The manager reviews the key performance measures and service improvements contained in the plan on a quarterly basis as part of the performance management process. Quarterly performance monitoring reports are reported internally, and a quarterly report is presented to Cabinet Board and the associated Scrutiny Committee.

In addition, regular meetings are held with the food hygiene team (food and health protection). This is to ensure that on-going projects, improvements and inspection targets outlined in this service plan and the business plan are effectively monitored and managed.

Achievements for 2015/6 included:-

- Inspecting 100% of all High Risk premises for food hygiene purposes.
- Issuing over 500 food hygiene ratings to businesses;
- Participating in National Food Safety Week
- Sampling food products in line with the all-Wales surveys of food quality
- Sampling from, and the assessment of, all private water supplies used in commercial food businesses and the temporary mains water supplies for Neath Fair;
- Serving 5 hygiene improvement (enforcement) notices to ensure certain businesses met minimum legal standards;

6.1.2 Food Standards and Feeding stuffs

Strategically, the Head of Service and the Environmental Health & Trading Standards Manager have overall responsibility for the direction and performance of the service. The Environmental Health & Trading Standards Manager is the Accountable Manager for the food & feed standards functions. The Manager reviews the key performance measures and service improvements contained in the plan on a quarterly basis as part of the performance management process, these are reported internally at quarterly intervals to Cabinet Board and the associated Scrutiny Committee.

Achievements for 2015/16 included:-

- Inspecting 100% of high risk premises for food standards purposes.
- Participating in the Glamorgan Group of Trading Standards Authorities coordinated sampling exercises and successfully bidding for food sampling grant money on behalf of the group.

- In conjunction with Swansea Trading Standards facilitating and arranging a caterers training event on the topic of food allergens.
- Continuing to exercise vigilance into the supply of illegal and counterfeit alcohol, both on inspection and as part of coordinated sampling exercises.
- Taking regular samples at schools to compare food supplied with that described in the local authority specifications.
- Identifying and successfully investigating a number of food fraud offences at takeaways and restaurants involving the substitution of beef for lamb in meals.
- Meeting the targets set by the new WHOTS/FSA regional feed delivery group.
- Implementing the new Feed Law Code of Practice.

6.2 Identification of Variation from the Plan

Variations from the Service Plan will be identified annually. Reasons for the variance and whether or not these are justified will also be given.

Trading Standards have incurred a large backlog of inspectable businesses. This is due to other work of a higher priority taking precedence. Accordingly, the department focussed on the areas of highest risk, i.e. “A” rated premises. However it has undergone a small restructure in food inspection delivery, which it hopes will help alleviate the pressure on inspections of higher risk premises; although the lower risk premises will not necessarily be subject to a proactive intervention. However it must be noted that proactive inspections will be subject to the same competition for resources as other work, and will be prioritised as felt necessary.

With regard to food hygiene interventions at lower risk rated premises, there remains a deficit, with priority remaining with resources being directed at inspection of higher risk and investigation of non-compliant premises.

6.3 Areas for Improvement

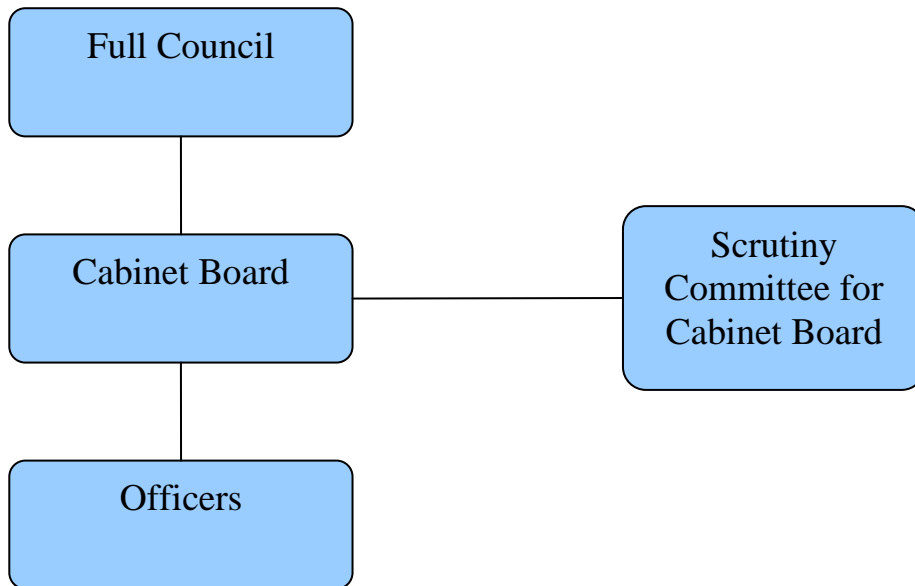
Over the past 5 years, the changes to food safety legislation and the challenges faced by food safety enforcement authorities have been significant. National priorities continue to be influenced by the Food Standards Agency, Regulatory Delivery and National Trading Standards (NTS), as well as the impact of the final report from the South Wales E.coli O157 public enquiry, and the ongoing visits from the EU Food & Veterinary Office to Welsh Authorities. Consequently, the food service will need to respond to these and improve the service further, particularly in light of funding challenges. However, some of the current planned improvements for 2016/17 and beyond include:-

1. Reviewing out of hours provision and cover arrangements in relation to outbreaks of communicable disease and service delivery- particularly emergencies;
2. Developing a training programme for officers involved in the investigation of outbreaks of communicable disease
3. Undertaking suitable promotional activities / campaigns.
4. Establishing measures to assess the quality of the service provided
5. Consulting more with stakeholders
6. Establishing stakeholder satisfaction questionnaires and encourage feedback

7. Continuing to review food standards, food hygiene (primary producers) and feed legislation in relation to qualification of officers and demands on the service
8. Continuing to develop the use of the Intelligence Operating Model for Trading Standards.
9. Continuing to improve the use of alternative enforcement procedures in relation to food inspections.

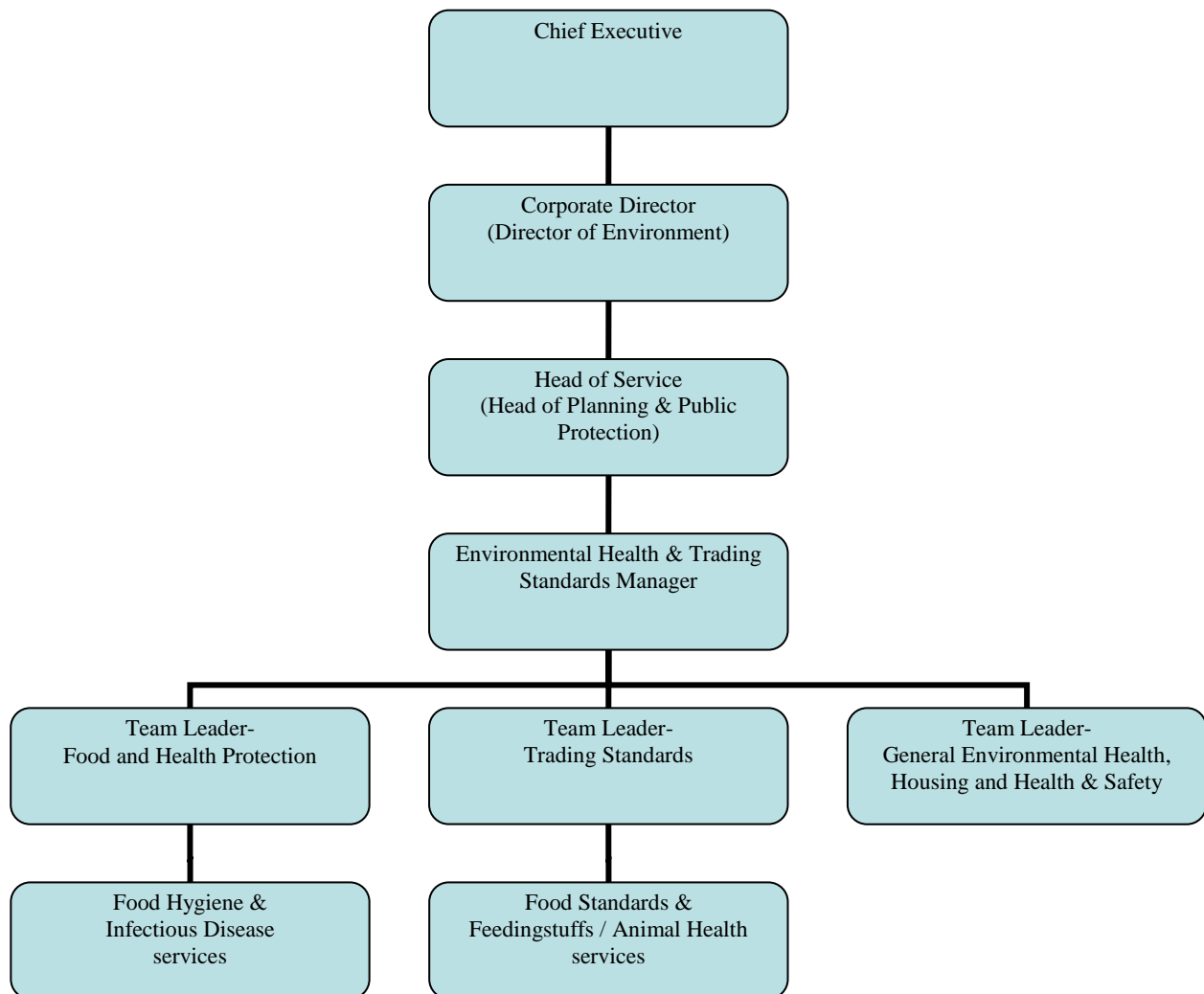
APPENDIX A

Decision Making Structure:



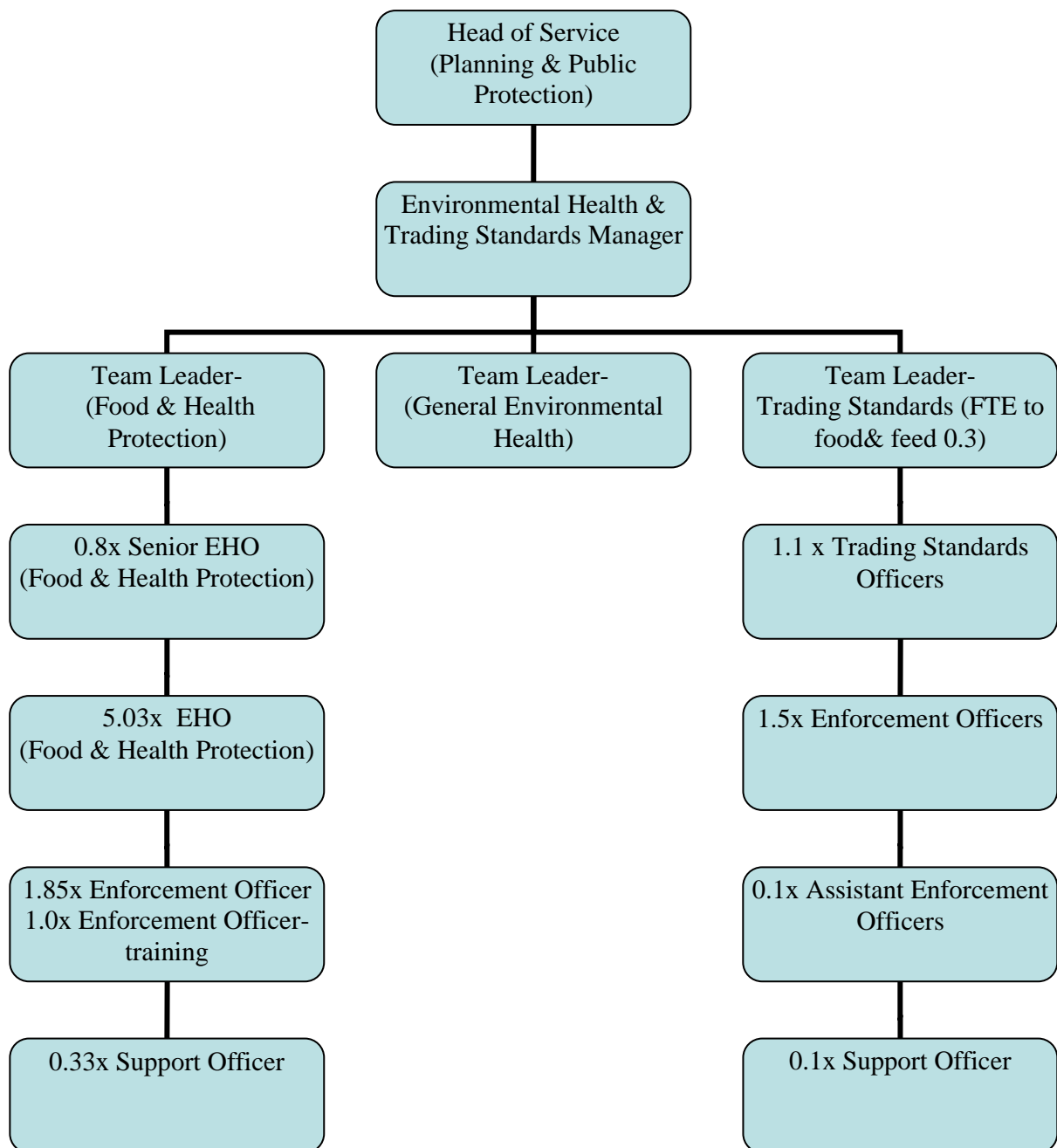
APPENDIX B

Department Structure:



APPENDIX C

Service Structure: (As at 1/4/2016)



APPENDIX D

Number of Registered Food Premises by Ward (2015 & 2016)

WARDS :	(WARD CODES)	2015	2016	WARDS:	(WARD CODES)	2015	2016
NEATH				PORT TALBOT			
Aberdulais	ABD	13	13	Aberavon	ABV	79	83
Alltwen	ALL	11	12	Baglan	BAG	38	40
Blaengwrach	BLA	13	12	Briton Ferry East	BFE	51	54
Bryncoch N	BRN	22	21	Briton Ferry West	BFW	14	13
Bryncoch S	BRS	39	38	Bryn and Cwmavon	BRY	44	48
Cadoxton	CAD	12	13	Coedffranc C	COC	44	45
Cimla	CIM	20	17	Coedffranc N	CON	10	10
Crynant	CRY	14	18	Coedffranc W	COW	33	39
Cwmllynfell	CWM	12	12	Cymmer	CYM	32	31
Dyffryn	DYF	28	29	Glyncorrgwg	GLC	9	10
Gwaun-cae-Gurwen	GCG	30	25	Gwynfi	GWY	14	12
Glynneath	GLN	44	42	Margam	MAR	50	51
Godregraig	GOD	5	4	Port Talbot	POR	78	83
Lr Brynamman	LBR	6	7	Sandfields E	SAE	44	46
Neath (East)	NEE	48	44	Sandfields W	SAW	40	43
Neath (North)	NEN	153	150	Taibach	TAI	44	42
Neath (South)	NES	21	21	Port Talbot area Total		624	650
Onllwyn	ONL	9	9				
Pelenna	PEL	13	12	Other / Out of area	xxx	0	0
Pontardawe	PON	90	88	NPT Combined Total		1345	1349
Resolven	RES	28	26				
Rhos	RHO	11	12				
Seven Sisters	SEV	22	20				
Tonna	TON	20	20				
Trebanos	TRE	8	7				
Ystalyfera	YST	29	27				
Neath area Total		721	699				