



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

Regeneration and Sustainable Development Cabinet Board

6th September 2019

Report of the Head of Planning and Public Protection

N. Pearce

Matter for Information

Wards Affected: *All*

ENVIRONMENTAL HEALTH AND TRADING STANDARDS: FOOD AND FEED SERVICE DELIVERY PLAN 2019-2020 and the FOOD AND FEED LAW ENFORCEMENT REVIEW 2018-2019.

Purpose of the Report:

1. To inform Members of the work plan for 2019-2020 of the Authority's Food and Feed enforcement service and the review of the Food and Feed enforcement service for 2018-2019.

Executive Summary:

2. Food Hygiene, and Food & Feed Standards enforcement remains a priority for the service.
3. Food hygiene inspection resources were prioritised and continue to be prioritised on undertaking appropriate interventions at all high risk food premises The national

performance indicator which identifies 'broadly compliant' premises remains consistently high. National and local food sampling initiatives were carried out throughout the year, and we will continue to take part and make use of sampling resources made available. The service utilises Social Media opportunities to raise awareness of current issues. Charges have been introduced for the provision of bespoke business advice and consultancy, whilst a basic level of advice and signposting remains free of charge.

4. Feed/Feeding-stuffs Standards work continues to be delivered regionally, in conjunction with City & County of Swansea Council (as funded directly by the Food Standards Agency). The cross-border arrangements appear to be a continuing success.
5. Food Standards resources were prioritised on interventions at high risk premises. However, there are still Food Standards interventions overdue at some premises. This backlog demonstrates that the allocated resource for food standards delivery is insufficient, but this is unlikely to change due to the Forward Financial Plan requirements imposed on the service. However, following a trial period, the new approach of the service utilising officers of the food hygiene team to assist with combined inspections at certain premises has been formally adopted. This new system will ease the pressure on the food standards function.

Background:

7. The Food Safety Act 1990 and the Food Standards Act 1999, together with associated statutory guidance, require local authorities to make provision for the enforcement of food and

animal feeding stuff safety measures and to plan for service delivery on an annual basis. The proposed Service Delivery Plan, attached as Appendix 1, sets out the way in which the Environmental Health and Trading Standards Service intends to deliver food and feed law enforcement during the period 2019-2020.

8. It sets the scene for the enforcement function locally, whilst recognising national priorities. It sets the hierarchy of priorities for which the service is responsible, and indicates the range of interventions which are designed to maximise the health gain and public protection from the resources available.
9. 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 via a variety of interventions at premises in the County Borough, e.g. sampling, intelligence

led investigations and surveys, and investigation of complaints, 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 do not
10. The authority must carry out an annual food and feed law enforcement performance review as part of the Framework Agreement (2010) between the Local Authority and the Food Standards Agency, which is attached at Appendix 2.
 11. The framework agreement sets out the planning and delivery requirements of feed and food official controls, based on the existing statutory Codes of Practice.
 12. The performance review considers the various requirements of “The Standard”, which include planned inspections / interventions, sampling, service requests and complaints, promotional work, training of staff and monitoring arrangements.

Financial Impacts:

13. No implications.

Integrated Impact Assessment:

14. There is no requirement to undertake an Integrated Impact Assessment as this report is for monitoring / information purposes.

Valleys Communities Impacts:

15. No implications

Workforce Impacts:

16. No implications

Legal Impacts:

17. No implications

Risk Management Impacts:

18. No implications.

Consultation:

19. There is no requirement for external consultation on this item.

Recommendations:

20. That the report be noted.

Reasons for Proposed Decision:

21. Matter for information

Implementation of Decision:

22. Matter for information

List of Background Papers:

23. None.

Appendices:

Appendix 1 - Food and Feed Service Delivery Plan 2019-20.

Appendix 2 - Food and Feed law enforcement review 2018-19.

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Appendix 1



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

FOOD & FEED LAW ENFORCEMENT
SERVICE DELIVERY PLAN
2019-2020



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Neath Port Talbot Office Hours:

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.

To meet the demands of a 24 hour economy the department regularly carries out enforcement work outside of normal office hours, including evening and weekends. Officers are expected to carry out this work as part of their normal duties.

Correspondence address:

Environmental Health & Trading Standards, The Quays, Brunel Way, Baglan. SA11 2GG.

Telephone contact:

01639 686868.

Consumer complaints for Trading Standards are automatically transferred to Citizens Advice Consumer Service on 03454 04 05 06.

Website:

www.npt.gov.uk

The website has information on EH&TS services for consumers and business and links to other information and relevant sites.

E-mail & Social media

Environmental Health : food@npt.gov.uk Trading Standards : tsd@npt.gov.uk

Facebook NptEnvHealth/TradingStandards

Twitter (NPTEHTS) and other Social Media.

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 food safety from the farm or primary producer (via enforcement of animal feed hygiene & standards and animal welfare) through to the ultimate consumer, via retail, manufacturer and catering establishments (the 'farm to fork' principle).

As part of the national Food Safety framework agreement, the Food Standards Agency (FSA), 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 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.

There are similar provisions in place for feed enforcement, which is funded directly from the Food Standards Agency and administered across Wales by the Welsh Heads of Trading Standards.

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 encourage good practices in food safety, food & feed standards and fair-trading, and to take action in line with the enforcement policy to discourage practices which are unfair to other traders or threaten health (via inspections, sampling, intelligence led investigations and surveys, investigation of complaints, malpractices and cases of food poisoning and advising feed and food business operators)
- To ensure that resources are targeted where they are most effective and address areas of highest public health risk

1.3 Link to corporate objectives and plans

In delivering the food and feed law enforcement service, both Food and Health Protection, and Trading Standards 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 emphasis will be on protecting and improving health, and promoting the economy of the County Borough. There are Local and National Performance Indicators for these services (see Paragraph 3.1.4 below). These are monitored on a quarterly basis via the corporate performance management framework.

2.0 BACKGROUND

2.1 Profile of Neath Port Talbot

Neath Port Talbot County Borough Council is a Unitary Authority, situated in South Wales and is a recognised statutory Food Authority. 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 over 1500 food/feed premises within the County Borough (being circa 1274 food premises and circa 250 feed premises) in which food or drink and feed or drink is produced, manufactured, processed, stored or sold. (See section 2.4 for further details on premises profile).

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 are the responsibility of the Head of Planning & Public Protection service in the Directorate of Environment.

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

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.

The City & County of Swansea as part of the regional delivery group for feed enforcement.

2.3 Scope of the Food & Feed Law Enforcement Service

The Food Hygiene service is delivered by officers of the Food & Health Protection Team. The Food Standards and Feed functions are delivered by officers of the Trading Standards section.

Other Service Functions	Delivered via
Fair Trading	Inspection programmes Provision of advice to businesses Sampling programmes Criminal investigation Responding to national food / feed alerts and recalls Inspection of weighing & measuring equipment
Health Promotion	
Consumer Fraud	
Weights & Measures	
Underage Sales	
Investigation and control of communicable diseases	
Animal Welfare	
Petroleum Enforcement	

When necessary, suitably competent and qualified food hygiene and food standards contractors are used to cover long term sickness/maternity leave/vacant posts or project work funded by external sources, but all in accordance with service need, the resources available and with authorisation by the Head of Planning and Public Protection.

2.4 Demands on the Food & Feed Service (Food Hygiene; Food Standards; Feed Standards)

Premises Profile

Table 1(a): Total number of Food & Feed premises within the Authority

Food premises	Feed Premises
1274 (of which 1222 are Registered within NPT).	250

See Appendix D for numbers of premises by Ward area

**Table
1(b):**

CODE	FOOD PREMISES	NO. OF PREMISES (2017/18)	NO. OF PREMISES (2018/19)	NO. OF PREMISES (2019/20)
F01	Primary Producer	1	2	1
F02	Manufacturer / Packer	23	26	28
F03	Importers / Exporters (EU)	0	0	0
F04	Distributor / Transporter	15	10	9
F05	Supermarket / Hypermarket	23	24	23
F06	Small Retailer	232	203	197
F07	Retailer / Other	71	92	91
F08	Restaurant / Café / Canteen	189	198	185
F09	Hotel / Guest House	22	12	12
F10	Pub / Club	209	191	186
F11	Takeaway	145	140	142
F12	Caring Premises	217	207	176
F13	School / College	96	79	75
F14	Mobile Food Unit	52	53	47
F15	Restaurants & Caterers – Other	123	135	100
F16	Importers / Exporters (3 rd Countries)	2	2	2
TOTAL		1420	1374	1274

- Food advice is available, in a variety of languages, to businesses via the Food Standards Agency’s initiative “Safer Food, Better Business” (SFBB).
- Note: 1222 premises have their Registered base with NPTCBC area, however once Registered they can trade in any area. Conversely, there will be a small number of traders (mainly mobile traders) who are based outside of the Borough, but regularly trade within the Borough, and can be subject to official control interventions (usually co-ordinated with their local LA).

Table 1(c):		Types of Feed premises:		
Code	Animal Feed Premises	No. of PREMISES (2017/18)	No. of PREMISES (2018/19)	No. of PREMISES (2019/20)
A	Manufacturer Using / containing additives	2	2	2
B	Manufacturer Not Using Additives	3	3	3
D	On Farm Mixer Using Additives	1	1	1
E	Store - In Region Distribution	4	3	3
I	Importer - Out Of Region Distribution	2	1	2
J	Surplus Food Supplier	8	12	8
P	Co Product Producer - In Region	0	2	0
S	Livestock Farm	210	283	216
T	Arable farm	10	17	10
U	Any Other Business	0	1	0
X	Not Known	1	1	1
Total:		241	326	246

Increased feed enforcement activity has meant that the department's feed premises records are becoming more accurate. This accounts for the large drop in registered feed premises.

The County Borough has 3 specialist feed manufacturers requiring inspection by officers with specific qualifications and competencies.

In line with the Food Law Code of Practice, the authority has placed an emphasis on "interventions" at food & feed businesses rather than full inspections. Full inspections / audits are targeted at the highest risk businesses, or at businesses that the department has received intelligence on. This is explored further in Paragraph 3.0.

Lower risk food and feed businesses will not necessarily be subject to a full programmed inspection, but may be dealt with via a focussed survey or as part of the food sampling programme.

The authority's food and feed enforcement activity is recorded on the Authority APP system. The annual returns and enforcement data that are to be submitted to the

Food Standards Agency are exported from this system via the Local Authority Enforcement Monitoring System (LAEMS).

2.5 Joint working / sharing resources and information & Agile Working

Following the systems review of 2017/18, the Food & Health Protection Service (delivering the food hygiene function) and the Retail section of the Trading Standards Service (delivering food standards), have a closer and more integrated working relationship. Information is exchanged between the two services more readily and regularly and joint exercises have been undertaken to increase awareness of the duties of each service for each service, and to promote stronger working relationships and joint working. This has led to improved coordination of food law enforcement between the services, minimising duplication and sharing information and intelligence. Similar exercises have been planned for 19/20 and shadowing visits are to become a regular feature of officer development.

Furthermore, the post of Senior Trading Standards Officer has been created within the Retail section to support officers and consequently food and feed delivery. Although this post has supervisory responsibilities, it is still front line and has enforcement duties.

The two services continue to pilot “agile” working within the authority. Resources and policies have been put in place to enable the officers to minimise office “downtime”.

In addition to the normal workloads, further demands will be made on the service in 2019/20. These include:

- The implementation of the requirements of the General Data Protection Regulations
- The continuing long term impact on food safety of the Pennington Report following the public inquiry into the (fatal) South Wales E. coli outbreak and recommendations for enforcement.
-
- Sustaining collaboration on the operation 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.
- 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 implementation of a new Trading Standards intelligence database replacing the existing one. The new system is more user-friendly and instinctive. It also has the advantage of being web based and is accessible by services other than TS, potentially fostering greater links with other teams within EH&TS.
-
- Further development of cross boundary and regional work in the fields of food and feed, to build resilience within service delivery.
-
- Seeking new business partners to broaden the implementation of the Primary Authority Scheme within NPT.
- The implications of the UKs exit of from the European Union and its effect it will have on enforcement and the economy.
-
- Identifying food businesses supplying “co-products” (i.e. former foodstuffs reprocessed as animal feed) and advising them of their obligations and responsibilities.
- Tackling the areas identified as local and national priorities for food & feed standards : food allergens, food supplements (particularly sold over the internet) and the adulteration and substitution of food.
- The maintenance of the regional feed enforcement delivery model with Swansea Trading Standards as per the agreement with the Food Standards Agency.
-
- Continue to meet the demands of new feed & food businesses within the county borough.

-
- Accommodating service delivery in line with the identified priorities 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 Analyst, National Food Crime Unit, local intelligence sources and partners.
-
- Fostering stronger partnerships with bodies that have an interest in breaches of legislation relating to food, including Her Majesty's Revenue & Customs, and the Animal & Plant Health Agency.
-
- To continue to develop procedures to minimise the duplication of efforts from Environmental Health and Trading Standards when visiting food and feed premises.
-
- The revised continuous professional development requirements of the Food Law Code of Practice, from 10 hours CPD to 20 hours CPD.

2.6 Regulation Policy

The department has a Member Approved enforcement policy incorporating the concepts of the Enforcement Concordat, Regulatory Enforcement and Sanctions Act 2008, Primary Authority Scheme and the relevant food and feed law codes of practice.

The enforcement policy can be found on the Council [website](#):

Officers of the service will seek to ensure food & feed business operators comply with relevant legislation by means of:

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

3.0 SERVICE DELIVERY

3.1 Interventions at Food and Feeding stuffs establishments

3.1.1 Intervention Policy

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.

The Food Law Code of Practice (Wales) has introduced a range of possible interventions to allow officers to use their professional judgment to apply a proportionate level of regulatory and enforcement activities to each food business.

Interventions are split into 2 categories

1. Official controls include:- inspections; monitoring; surveillance; verification; audit; and sampling (where the analysis is to be carried out by an official laboratory).
2. Other interventions which do not constitute official controls include:- education, advice & coaching provided at a food establishment; and information & intelligence gathering.

Interventions are 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.

3.1.2 Systems review and the coordinated intervention programme

Following the internal review of the food safety service, interventions are managed via a coordinated food hygiene and food standards inspection programme. Most lower risk food standards premises (category “C” rated) will be inspected for that element by suitably trained and competent food hygiene officers during their programmed food hygiene inspections.

Similarly, low risk food hygiene businesses (category “E” rated) will be subject to an unofficial control from food standards officers. In both cases, more complex

matters detected during the inspection will be referred back to the relevant team.

Shadowing visits will take place in 2019/20 following their trial in 2018/19, this is to promote consistency and continuity between the teams and contributes towards officers' professional development.

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 subject to a suitable intervention within a range of 6 months to 3 years.

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 place particular emphasis on assessing and advising food businesses on the requirement for a documented food safety management system and food hygiene training.

Following a systems review, the section has redesigned into reactive and proactive teams. Resources can flow between the two teams as required.

Table 2(a): Planned Food Hygiene Interventions due 2019/20 (as at 1st April 2019)

RISK CATEGORY	NUMBER OF PREMISES CARRIED FORWARD	(NUMBER OF PREMISES IN CATEGORY 2019/20)	NUMBER OF NEW INTERVENTIONS DUE / PLANNED 2019/20	TOTAL NUMBER DUE / PLANNED 2019/20	ESTIMATE NUMBER DUE / PLANNED 2020/21
HIGH RISK					
A (2 interventions per year)	0	(2)	4	4	<i>e.10</i>
B (1 intervention per year)	0	(56)	56	56	<i>e.60</i>
C (1 intervention every 18 months)	0	(510)	315	315	<i>e.320</i>
Unrated	23	---	---	23	---

initially until formally inspected (prior to opening / within 28 days of opening).					
Sub Total	---	---	---	398	<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 (1 intervention every 2 years)	2	(139)	70	[70]*	<i>e.70</i>
E (premises should be inspected every 3 years or can be subject to an Alternative Enforcement intervention in lieu of inspection)	0	(546)	81	[81]*	<i>e.100</i>

Certain low risk premises may at the discretion of the authority be subject to an alternative enforcement regime.

As per the 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.

Category E premises should be subject to an intervention every 3 years, which could be part of an Alternative Enforcement Strategy.

*Priority for interventions will always lie with Higher Risk categories, consequently, lower risk (category D & E) may be de-prioritised, where resources are capped.

In addition to the planned interventions above, any 'newly opened / change of ownership' food premises will be targeted for inspection / an intervention. In 2018/19, there were 276 requests for advice in relation to food premises registration and new food businesses, and a similar figure is estimated for 2019/20.

It is estimated that in addition to the planned primary inspections/interventions to be undertaken, a further 200 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.

Premises eligible for a rating under the mandatory Food Hygiene Rating Scheme have their scores publicised on the following website: www.food.gov/ratings .

Businesses who initially fail to meet the highest standard (Food Hygiene Rating 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. An all-Wales fee is set for this work. This council fully supports and implements the Food Hygiene Rating Scheme.

Food Standards & Feed Standards

The inspection / intervention programme is based on the inspection rating scheme contained in Annex 5 of the Food Law Code of Practice and the Feed Law Code of Practice,

Therefore, dependent on risk, all premises are due for an intervention within a range of 12 months to 5 years.

At the discretion of the authority and in accordance with the Code of Practice certain low risk food standards premises may, be inspected via an alternative enforcement regime or during a food hygiene visit as set out in 3.1.2. The latter

interventions focus on durability and the traceability of food, and those premises where allergen controls are robust.

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 and feed.

The Feed Standards & Feed Hygiene inspection programme is set and funded by the Food Standards Agency and delivered regionally in conjunction with Swansea Trading Standards.

Animal health officers have the responsibility of inspecting feed hygiene systems on farms alongside their animal welfare duties. These officers are assessed as competent as per the Code of Practice. Feed manufacturers and retailers are inspected by Trading Standards Officers with the appropriate qualification and competencies.

During inspections / interventions competent officers will carry out statutory duties in line with the legislation and local policy.

Table 2(b):	Planned Food Standards Interventions due 2019/20 and estimated for 2020/21					
CATEGORY	(TOTAL NO. OF PREMISES IN CATEGORY 2019/20)	NO. OF PREMISES CARRIED FORWARD (BACKLOG-DUE PRIOR TO 31/3/19).	NO. OF NEW INTERVENTIONS DUE 2019/20 (1/4/19-31/3/20)	CUMULATIVE TOTAL NUMBER PLANNED BY 31/3/2020 (INCLUDING BACKLOGS)	ESTIMATED NUMBER OF REVISITS 2019/20	ESTIMATED NUMBER DUE / PLANNED 2020/21
A (1 intervention a year)	11	0	11	11	<i>e.5</i>	<i>e.12</i>
B (1 intervention every 2 years)	319	12	149	161	<i>e.12</i>	<i>e.180</i>
C (1 intervention every 5 years / AES)	749	17	58	75	<i>e.5</i>	<i>e.110</i>
UNRATED	302	302	0	302	<i>e.10</i>	<i>e.150</i>

*In accordance with the Framework Agreement and frequencies set in the Food & Feed Law Code of Practice :

- Food Standards Category B 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, as long as the business is broadly compliant (COP 5.2.7.1.5.2)
- Food Standards Category C premises should be subject to an intervention every 5 years, which could be part of an Alternative Enforcement Strategy.
- Where resources are restricted, the priority is to carry out interventions at category "A" and unrated businesses

Table 2(c):	Planned Feed Standards Interventions 2019/20 & estimated for 2020/21 Feed is co-ordinated on a regional basis, interventions are directed by the Food Standards Agency	
Premises Type	NPT Planned 2019/20	<i>NPT Estimated 2020/21</i>
Manufacturer	1	2
Co Product Producer	4	6
Mobile Mixer	0	0
Importers	0	0
Feed Stores	1	1
Distributor	2	2
Transporter	1	1
On Farm Mixer (Annex II)	1	2
On Farm Mix	0	0
Pet Food Manufacturer	1	1
Supplier of feed materials/Surplus Food	0	0
Sub Total "Above The Line"	11	15
Livestock farms	35	40
Total due for inspection	46	55

3.1.3 Resources For Inspections / Interventions

Food Hygiene

The following table contains the current staffing structure breakdown

Table 3(a) – as at 1/4/2019 (expressed as FTE’s- Full Time Equivalents)

	EHORB (EHO)	EHORB (Higher Risk premises)	Non-EHORB (Support Staff)	Total
Team Leader (F&HP)	1.0			
Senior EHO (F&HP)	0.92			
EHO (F&HP)	5.24			
Enforcement Officer		1.86*		
Support Officer			1.0	
Total as at 2019-04-01	7.16	1.86*	1.0	10.02
*Note: 1.0 fte EO (F&HP) is currently seconded to Gen EH team				
<i>Historic Totals (trends):</i>				
<i>Total as at 2018-04-01</i>	<i>6.05* (*balance: 1.0 FTE seconded)</i>	<i>2.86</i>	<i>1.0</i>	<i>9.91</i>
<i>Total as at 2017-04-01</i>	<i>6.84 (+0.22 temporary)</i>	<i>1.86</i>	<i>1.33 approx. (NB- 1 officer pursuing qualification)</i>	<i>10.03 (+ 0.22 temporary = 10.25)</i>
<i>Total as at 2016-04-01</i>	<i>6.84</i>	<i>1.86</i>	<i>1.33 approx.</i>	<i>10.03</i>
<i>Total as at 2015-04-01</i>	<i>5.2</i>	<i>1.0</i>	<i>3.9</i>	<i>10.1</i>

<i>Total as at 2014-04-01</i>	<i>5.1</i>	<i>1.0</i>	<i>3.0</i>	<i>9.1</i>

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 EHRB (Environmental Health Registration Board). All Enforcement Officers hold the Higher Certificate in Food Premises Inspection, or equivalent. The Table above 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.

In 2018, a temporarily seconded EHO post was returned to the service from General EH team, whilst a secondment of a vacant EO post was made to the General EH team for 18 months. Temporary staff and locums/contractors have also been utilised in previous years to support the service, when additional resources have been needed.

There is the facility to redeploy Food Hygiene qualified staff to or from other parts of the service when necessary (see Chapter 4 on Resources for fuller details on the current staffing structure).

Staffing Allocation (Apportionment estimates: Required & Allocated)

Table 3(b):

Food Hygiene Resources			
	Estimate of Required Resources	Allocated	Relative priority assigned
Food hygiene inspections: Cat A-C	3.0	3.0	High / Medium-high
Food hygiene inspections: Cat D	0.5	0.5	Medium-low
Food hygiene inspections: Cat E	0.5	0.5	Low
Food hygiene Complaints	1.2	1.2	High / Medium-high
Food hygiene Sampling	0.2	0.2	Medium
FH New Businesses & Compulsory Registrations	1.0	1.0	Medium-high
FH Advice & Promotional work	0.3	0.2	Medium / Medium-low
FH Revisits	1.0	1.0	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.	0.1	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	0.0	Resources diverted when required.
Non-hypothecated / generic enforcement resource		0.22	
TOTALS (in FTE's):	10.5	10.02	

It is estimated that the required resource to deliver all aspects of the Framework Agreement and Code of Practice is 10.5 FTE.

Food Standards and Feeding stuffs

Table 4(a):

Trading Standards Staffing at 1/4/2019 devoted to Food & Feed by Full Time Equivalent of officer						
Food Standards	DTS	DCA	DCATS Qualified	(Unqualified)	TS Total	EH input
TS Team Leader	0.3				0.3	
Senior TSO			0.4		0.4	
TSO	1.0				1.0	
Enforcement Officer		0.5	0.1		0.6	
TS Assistant				0.1	0.1	
Admin				0.1	0.1	
Food Hygiene staff qualified for standards						0.5
Total as at 1.4.2019	1.3	0.5	0.5	0.2	2.5	(3.0)
<i>Total as at 1.4.2018</i>	<i>1.3</i>	<i>0.5</i>	<i>1.0</i>	<i>0.2</i>	<i>2.5</i>	<i>(3.0)</i>
<i>Total as at 1.4.2017</i>	<i>1.2</i>	<i>0.4</i>	<i>0.4</i>	<i>0.2</i>	<i>2.2</i>	
<i>Total as at 1.4.2016</i>	<i>1.2</i>	<i>0.4</i>	<i>0.4</i>	<i>0.2</i>	<i>2.2</i>	
<i>Total as at 1.4.2015</i>	<i>1.5</i>	<i>0.3</i>	<i>0.3</i>	<i>0.8</i>	<i>2.9</i>	
<i>Total as at 1.4.2014</i>	<i>1.5</i>	<i>0.3</i>	<i>0.3</i>	<i>0.8</i>	<i>2.9</i>	
<i>Total as at 1.4.2013</i>	<i>1.2</i>	<i>0.3</i>	<i>0.3</i>	<i>0.8</i>	<i>2.9</i>	

Feed	DTS	DCA	DCATS Qualified	(Unqualified but Competent)	Total
TS Team Leader	0.1				0.1
TSO	0.1		0.1		0.2
Enforcement Officer		0.0		0.5	0.5
TS Assistant	0	0	0	0	0
Admin				0.1	0.1
Total as at 1.4.2019	0.2	0.0	0.1	0.6	0.9
<i>Total as at 1.4.2018</i>	<i>0.2</i>	<i>0.0</i>	<i>0.0</i>	<i>0.6</i>	<i>0.9</i>
<i>Total as at 1.4.2017</i>	<i>0.2</i>	<i>0.0</i>	<i>0.0</i>	<i>0.6</i>	<i>0.8</i>
<i>Total as at 1.4.2016</i>	<i>0.3</i>	<i>0.4</i>	<i>0.0</i>	<i>0.5</i>	<i>1.2</i>
<i>Total as at 1.4.2015</i>	<i>0.3</i>	<i>0.1</i>	<i>0.0</i>	<i>1.0</i>	<i>1.4</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. Food standards are further bolstered by lower risk food standards inspections being carried out by suitably qualified food hygiene officers.

2 trading standards officers and additional enforcement officers have non primary producer/farm inspection duties. Inspection of feed on farms is the responsibility two enforcement officers. All officers are suitably qualified and deemed competent, and carry out the assessments on an annual basis.

For staffing structure see Appendix C

The proportion of time spent by each officer on the feed and food function can be found below.

Table 4(b):

Food Standards Resources		
Food Standards Function	Estimate of Required Resources	Allocated
Food Standards Interventions	2.1	2.3
Food Standards Complaints	0.3	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 Safety alerts	0.2	0.2
Sub-Total	3.6	3.5
<i>Estimated additional resource required for Recovery of Backlog of Food Standards Work (short term: 2 years approx.)</i>	2.1	0.0

At current intervention rates, to achieve inspections targets as per the code of practice (that is, inspection of all 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 5.7 FTE to overcome the backlog, particularly unrated businesses, in a reasonable period of time (estimated as two years).

Unrated businesses are initially assessed by food hygiene team during their registration and new businesses phase for referral as necessary to Trading Standards - as per the protocol following the systems review discussed earlier in this document. This will allow Trading Standards to focus on the higher risk food standards businesses.

Once the backlog of inspections is recovered, to then maintain the inspection rate the department would need to maintain 3.6 FTE food officers.

Feed work provisions are now arranged regionally (in conjunction with the City & County of Swansea) and funded directly by the Food Standards Agency.

3.1.4 Targets and Priorities for 2019/20

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 023: “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 of ratings and the administration of the national Food Hygiene Rating Scheme, which has been mandatory since 28th November 2013;
3. To undertake inspections / interventions at high risk premises for food hygiene. (See table 2(a) for number of inspections due). This PI is based on the inspection of 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.
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.
-
7. To further develop a cross-discipline approach to undertake certain combined food hygiene and food standards assessments, following appropriate training and up-skilling of staff.

Food Standards and Feeding stuffs:

1. To achieve 100% of inspections/interventions of “A” rated premises for food standards & feed purposes
2. To assess businesses for compliance with basic legal standards via a variety of intervention tools.
 -
3. To ensure that significant breaches are acted upon and proper controls are evenly applied to all businesses in a fair and equitable manner in line with the enforcement policy.
 -
4. To complete the annual food sampling plan
5. To complete the regional feed delivery plan
6. To continue to implement the Intelligence Operating model across the service.
 -
7. To maintain competency and training for all relevant staff
 -
8. To promote good practice within food & feed businesses.
9. To continue to support and develop the cross-discipline approach to undertake certain combined food hygiene and food standards assessments, following appropriate training and up-skilling of officers from both teams.

3.1.5 Possible Restrictions on Providing Service

Due to limitations of staff resources, extended periods of absence can lead to a drop in service provision- this issue is constantly monitored.

It is important to maintain officer competencies across a variety of disciplines to continue 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, but food and feed standards work is a high priority.

Occasionally, projects and targets need to be re-assessed to focus on the areas of greatest need.

Through implementing the Intelligence Operation Model and utilising the intelligence led approach advocated by National Trading Standards, the department is focussing on the areas which require most attention. The new regime of Food Hygiene officers undertaking limited Food Standards work will help meet demand.

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. The EDR (Employee Development Review) and supervision review process means that officer's competency is continually monitored and training is delivered where required.

Communication, reference and expert support:

The department has access to the following:

- Technical Indexes,
- Police National Legal Database (PNLD)
- Knowledge Hub
- National Anti-Fraud Network (NAFN)
- RIAMS (as provided by the Food Standards Agency)
- Food Standards Agency
- IDB (The Trading Standards Intelligence Database)

- Coordinating groups and panels specialising in food and feed enforcement
- Public analyst (s)
- Email & Internet
- Trading Standards Regional Intelligence Analyst intelligence database and Local Intelligence Officer Network.

Where additional expertise is required the Head of Service will be briefed and a suitable response will be formulated.

Coordinated enforcement:

Trading Standards has representation on the Glamorgan regional coordinating group for food standards.



Trading Standards 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 in 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.

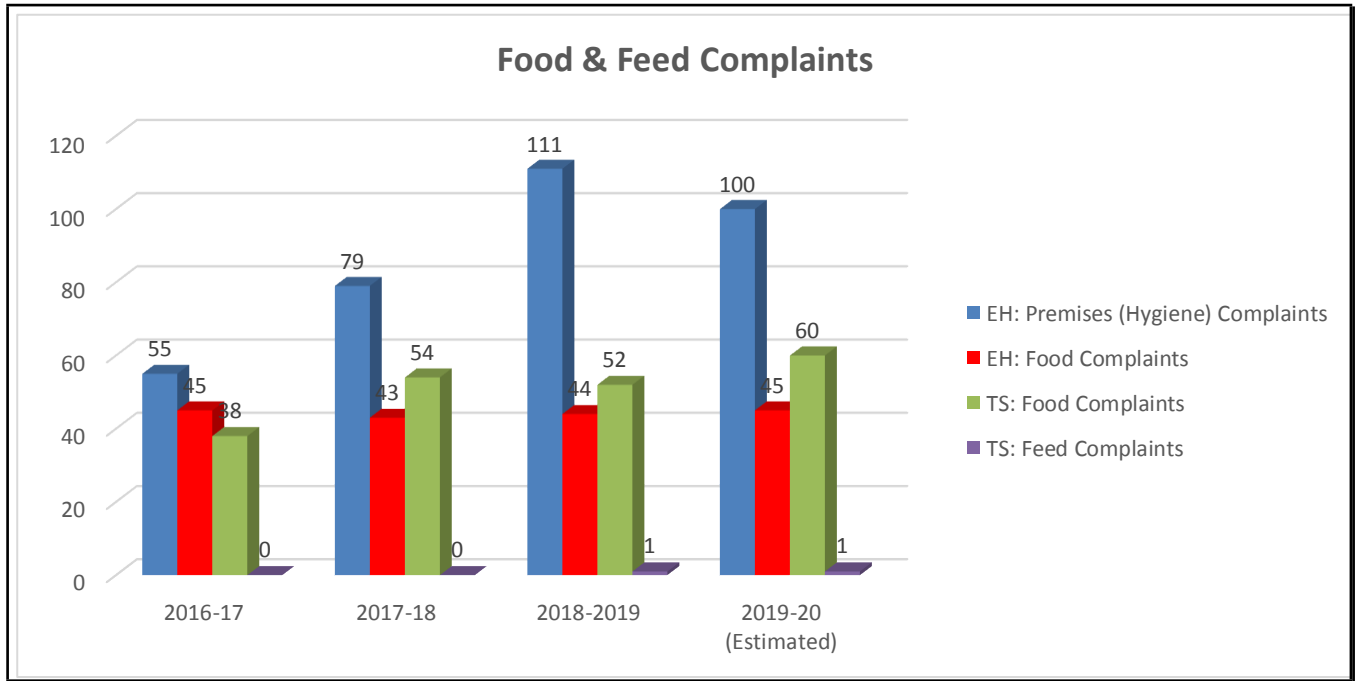
Food Hygiene and Health Protection work closely and liaise with the Public Health Laboratory, Public Health team of the NPHS, and the Public Analysts when expertise is required. The Authority’s public analyst service is consulted during the drafting of the sampling programme for sampling subjects, costs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

3.2 Food and Feeding-stuffs 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, consistently and as per the enforcement policy and internal policy and procedure

The following graph illustrates number of complaints/ service requests received by the department

Table 5(a):



The reactive workload is equivalent to approximately 1.4 FTE- based on 1.2 FTE for food hygiene and 0.2 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. As a consequence, certain categories of service request may receive a 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 originating authority and to any that may set up their decision making centre within the authority. The department has made a commitment to initiate Primary Authority partnerships, including food and feed. The Trading Standards service has made a commitment to expand its number of partnerships in 2019/20.

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). Potential enforcement action would need to be coordinated with the Primary Authority of the business involved.

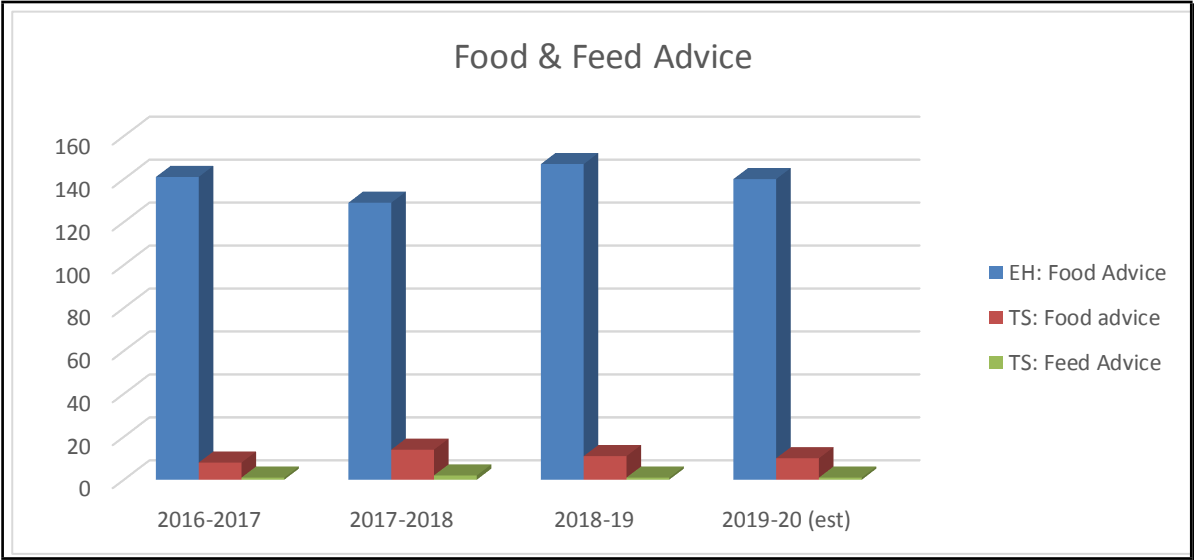
Elsewhere, where a breach is detected involving a company based in another part of the UK, liaison is instigated with the relevant local authority / authorities under the Home Authority principle.

Where significant food or feed breaches with a potential national or international impact occur, the department will liaise with the Food Standards Agency and relevant border inspection points / ports.

3.4 Advice to Businesses

In 2018/19 the EHTS department began charging for the provision of certain business advice. The department will not charge for “signposting” businesses to sources of advice, but will charge for bespoke or enhanced consultancy type assistance- such as examination of products, systems and labels. It is hoped that this will go some way to offsetting service provision costs.

Table 5(b):



There has been no noteworthy fall in demand for the service, but nor has the income generated been significant.

3.5 Food and Feed Sampling

Food sampling trends, intelligence and Food Standards Agency priorities are examined, analysed 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 should be taken as part of a programmed intervention if deemed appropriate or in connection with enforcement investigations.

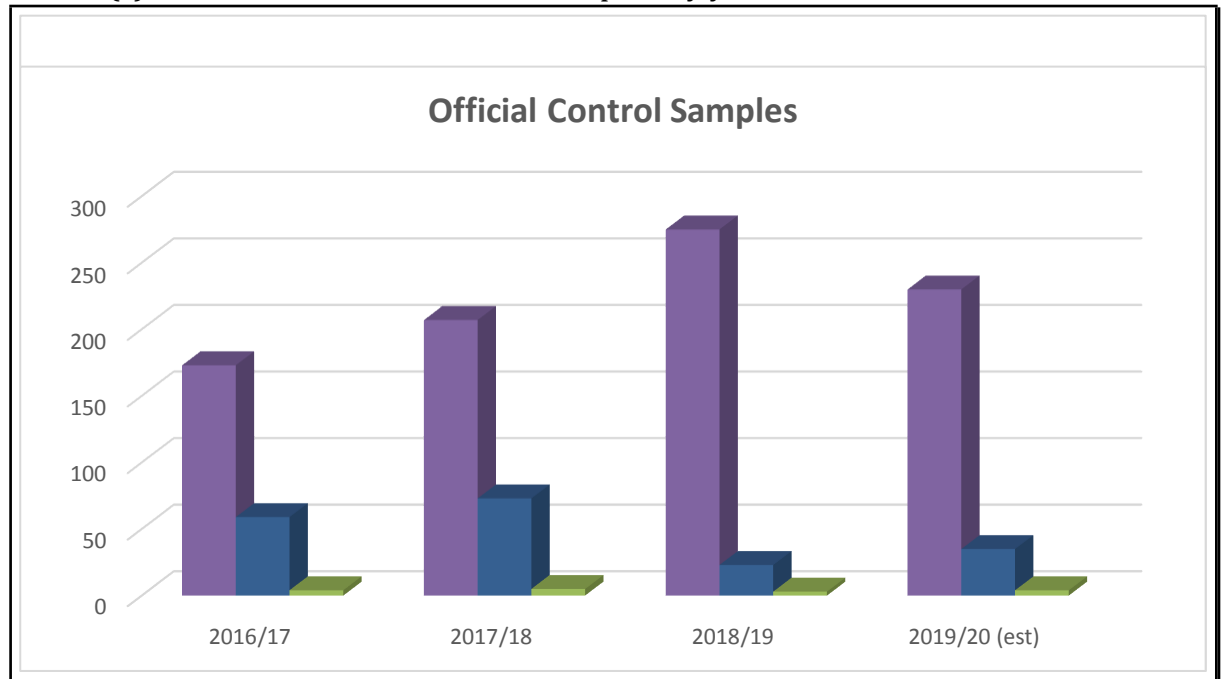
The Authority participates in various co-ordinated sampling programmes from such bodies as:

- 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

The Food Standards Agency directs the regional feed coordination plan's sampling programme.

Trading Standards are embarking on a larger food standards sampling programme than previous years. The service is targeting problem areas such as allergens, colours and descriptions at takeaway outlets and carrying out sampling of manufacturers and wholesalers as part of the intervention programme. Sampling between Food & Health Protection and Trading Standards is now coordinated and are incorporated into the annual plan of food sampling devised respectively by Environmental Health and Trading Standards.

Table 5(c): Numbers of Official Control Samples, by year.



Resource allocation:

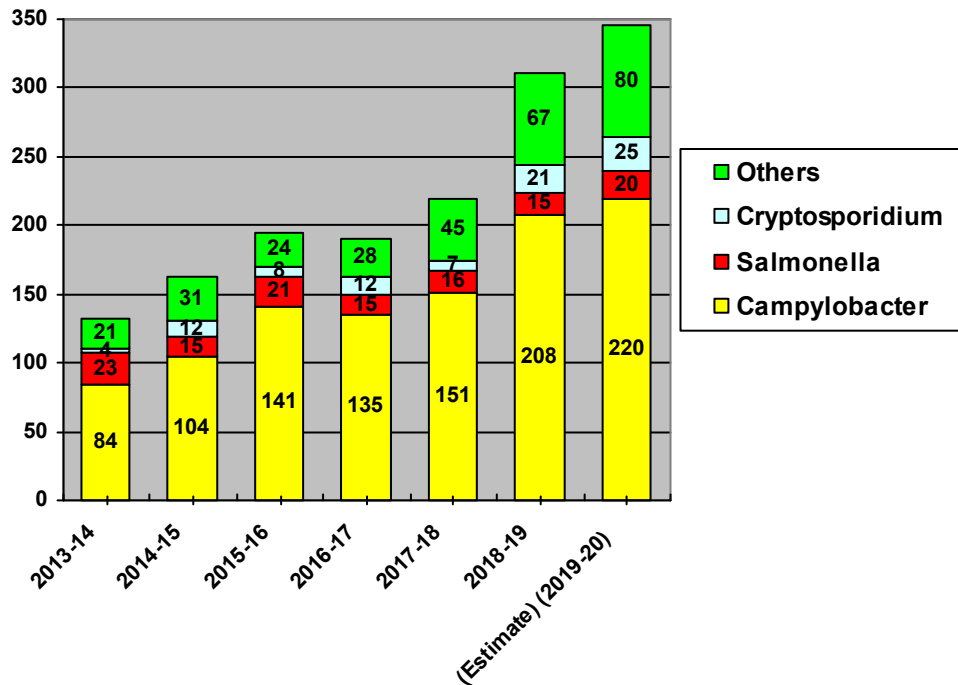
- Approximately 3 days a month are spent by one officer (usually a Support Officer) sampling foods for microbiological analysis and undertaking the subsequent administration.
- Most food standards samples are taken by qualified and competent officers. However, Trading Standards will be utilising the TS assistant for informal sampling surveys, follow up action to be taken by suitably qualified and authorised officers.
- Samples taken are submitted to either the local Microbiology testing laboratory (PHW- lab) or Public Analyst within 24 hours of sampling.

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

All formal notifications (of all types of Infectious Disease notifications) are recorded on an NHS shared platform (called TARIAN). 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.

Table 5(d): Graph to show Notifications of all Infectious Diseases, including Food-related



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 internal resources are sufficient to deal with the estimated number of food poisoning cases for the forthcoming year

3.7 Food & Feed Safety Incidents

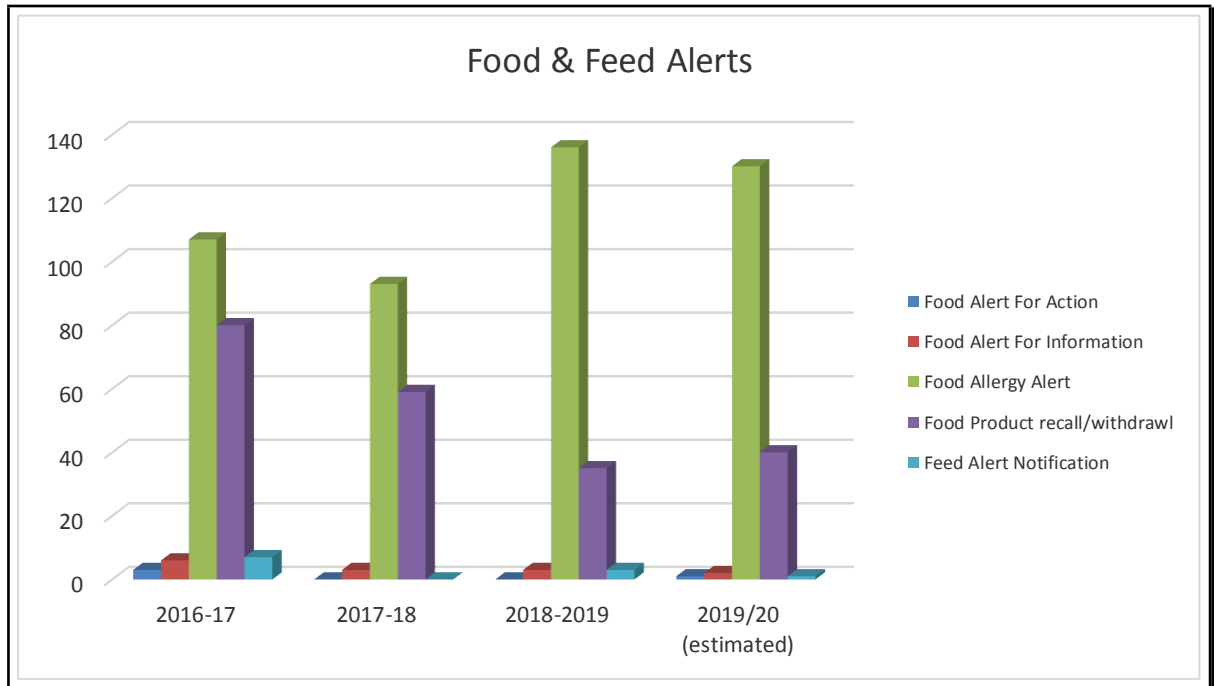
The service has a documented procedure which deals with action to be taken following the receipt or initiation of a food alert. In line with the current Code of Practice, the department uses the APP / Flare database for recording actions taken following a food or feed alert.

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 takes priority over other work of the sections. More often, Food Alerts for Information or Allergy are issued. Most food alert warnings received require only a small officer resource. However occasionally more resources will be required.

When necessary, affected businesses will be contacted and encouraged to commence a withdrawal. Enforcement procedures exist to ensure an appropriate response.

Equally, the department will liaise with the Food Standards Agency Wales and other relevant agencies who will be contacted immediately via the applicable Food Incident report form/ mechanisms for breaches detected in NPT.

Table 5(e):



The department receives a significant number of allergy alerts; however few of these require action on the part of the food authority. Existing internal resources will be sufficient to deal with the estimated number of food alerts / food incidents, as each inspecting officer also deals with reactive work.

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 6 : 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
WWhoEHG Food Safety (Task Group & Technical Panel)	4 days per year	1 Officer
WWhoEHG Communicable Disease (Task Group & Technical Panel)	4 days per year	1 Officer
WWhoEHG: 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
Welsh Food Fraud Coordination Unit	Estimate 2 days per year	2 Officers
National Food Crime Unit	Estimate 2 days per year	2 Officers
Ad hoc meetings with NPTCBC Education and Social Services Departments	4 days per year	1 Officer
Key: WWhoTS = Welsh Heads of Trading Standards. WWhoEHG = Welsh Heads of Environmental Health Group CCDC = Consultant in Communicable Diseases		

3.9 Food and Feed Safety and Standards Promotion & Intelligence

Educational and promotional activities are considered to be important aspects in the delivery of a varied and comprehensive food safety service. The following table illustrates how this authority achieves this function.

Methods of Food & Feed Promotion			
Food information available directly from EH& TS and via the website.	Attendance at consumer education events.	Liaison with NPTCBC food delivery services	Targeted advice to consumer groups, FBOs and FeBOs.
Disseminating information on the work of the department via social media	Active promotion of national food Safety events	Facilitating hand washing demonstrations in educational establishments and voluntary groups when requested.	Targeted seminars and training sessions to FBOs & FeBOs

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 encourage businesses implement systems that achieve compliance with relevant legislation. Prospective business owners are encouraged to seek the advice of the department before the food business opens to prevent possible food hygiene and standards contraventions from occurring, however this will attract a charge.

The business side of health promotion function 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.

Methods of Sharing Intelligence

<p>Knowledge Hub (reference and discussion site)</p>	<p>National Anti-Fraud Network (NAFN)</p>	<p>IDB (The Trading Standards Intelligence Database)</p>	<p>RIAMS (as provided by the Food Standards Agency)</p>
<p>Trading Standards Regional Intelligence Analyst intelligence database and Local Intelligence Officer network.</p>	<p>Civica / APP. Local authority enforcement database</p>	<p>FSSiNet – Food Sampling Surveillance System</p>	<p>Coordinating groups and panels specialising in food and feed enforcement</p>

4.0 RESOURCES

4.1 Financial Allocation

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

Table 7	
Budget Figures	
Revenue Budget	Actuals 2018/19
Expenditure	
Staffing- Food Hygiene	418,578
Staffing- Infectious Disease	46,509
Staffing- Food Standards	82,113
Staffing- Animal Feeding Stuffs	22,124
Transport (TS)	2,110
Transport (EH)	6,907
Equipment (EH)	2,931
Legal Fees – (TS)	0
Sampling & Analysis – Food Hygiene	1483
Sampling and Analysis – Trading Standards – Food & Feed only	28777
Total Expenditure	611,532
Income	
Government Grant	0
Other Income	7960
Total Income	7960
Net Expenditure	603,572

4.2 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 monthly briefing sessions to update staff on new developments in the field, business plan progress, administration issues and to discuss cases.

The training and development budget for 2019/20 for the whole of the EH & TS service is initially set at £8,923. Training is arranged regionally, and by attending events arranged by the FSA and utilising e-training facilities.

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 10 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.

Feed CPD runs over the financial year, April to March. Training is arranged regionally via the funding provided by the FSA.

4.3 Legal Expenditure

Legal fees and costs for taking action in connection with food standards and food hygiene cases have remained fairly constant over the past few years. Whilst there is no direct budget allocated for this purpose, 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 ad-hoc basis, or from central reserves. There is a recent example of this kind of occurrence with a consumer fraud investigation which is likely to incur 6 figure legal fees.

Receipts from the incentivisation scheme under the Proceed of Crime Act can be re-invested in enforcement related actions. There has been a moderate rise within both food services of cases referred for prosecution as significant infringements have been detected. This is likely to continue to persist over the coming years as intelligence indicates that there is 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 performance measures is carried out on a Quarterly basis, and reported to the relevant Member forum for scrutiny. Additionally, ad-hoc internal checks are undertaken to monitor progress towards the Business Plan priorities.
- Monitoring of inspections by supervisors and management within each section. 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 Food Standards Agency (FSA) has discretion to undertake audits (full or focussed) of food authorities, and their latest full assessment was undertaken in 2014, with a follow up visit in August 2016.

6.0 REVIEW

6.1 Review Against Service Plan

Strategically, the Head of Service and the Environmental Health & Trading Standards Manager has overall responsibility for the direction and performance of the service.

The Environmental Health & Trading Standards Manager is the Accountable Manager for the food hygiene, food standards and feed standards & hygiene 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.

6.1.1 Food Hygiene

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 2018/19 included:-

- Inspecting 100% of all High Risk premises for food hygiene purposes.
- Issuing over 500 food hygiene ratings to businesses;
- Sampling food products in line with the all-Wales surveys of food quality
- Serving 34 hygiene improvement (enforcement) notices to ensure certain businesses met minimum legal standards;

6.1.2 Food Standards and Feeding stuffs

Achievements for 2018/19 include:-

- Inspecting 100% of High Risk premises for food standards purposes.

- Participating in the Glamorgan Group of Trading Standards Authorities coordinated sampling exercises.
- The surrendering of over 600 bottles of non-compliant vodka to the department from a large regional supermarket chain.
- Two successful prosecutions of local businesses that despite repeated advice failed to comply with legislation. One of these was a joint investigation with the food hygiene service.
- Improving the coordination between the food hygiene and food standards intervention programmes and the subsequent sharing of intelligence.
- The continued detection and correction of breaches of allergen legislation.
- Running a food standards training event for FBOs in conjunction with the City & County of Swansea.
 - Continuing to identify and investigate a number of food fraud offences at takeaways and restaurants involving the substitution of beef for lamb in meals and the presence of prohibited colours.
 - The continued delivery of advice to traders in respect of allergen information provision and the establishment and maintenance of allergen control systems. This has been identified as a priority area, and will continue into the new financial year.
 - Meeting the targets set by the WHOTS/FSA regional feed delivery group.
 - The continued development of a coordinated enforcement plan with Food Hygiene

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 has a large backlog of inspectable businesses for Food Standards purposes. This is due to higher priority work taking precedence. The implementation of the coordinated intervention programmes has eased the pressure on the service slightly. Proactive inspections will continue to be subject to the same competition for resources as other work, and will be prioritised as necessary.

With regard to food hygiene interventions at lower risk rated premises, the previous backlog has been addressed. However, there remains a risk that if resources are capped, priority and resources will be directed at inspections of higher risk establishments and investigation of non-compliant premises.

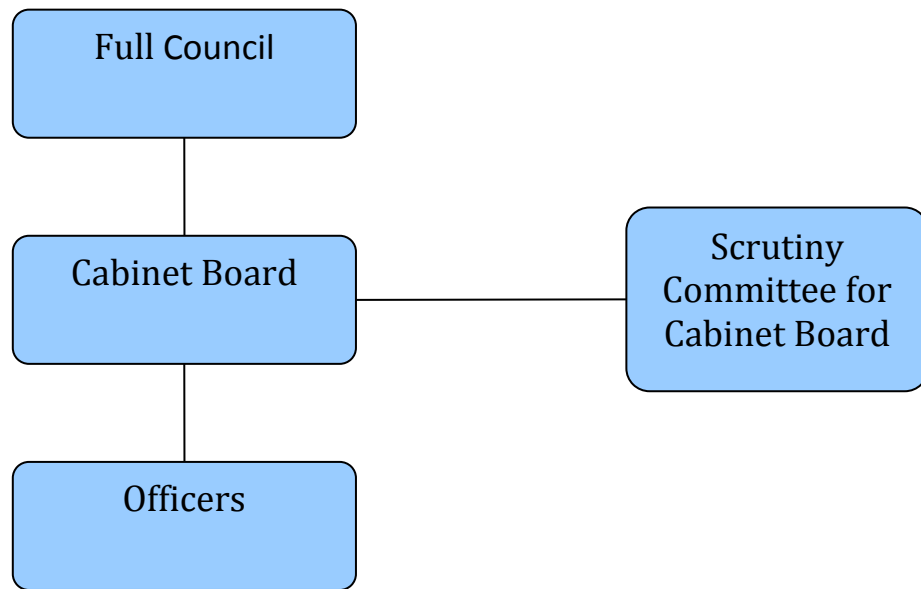
6.3 Areas for Improvement

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, Office of Product Safety & Standards (formerly 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. However, some of the current planned improvements for 2019/20 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. Continuing to review food standards, food hygiene (primary producers) and feed legislation in relation to qualification of officers and demands on the service
7. Continuing to develop the coordinated food hygiene / standards intervention programme, as highlighted by the internal 'System Review' process
8. Continue to develop the agile working scheme
9. Continuing to develop the use of the Intelligence Operating Model for Trading Standards
10. Continuing to improve the use of alternative enforcement strategies in relation to food and feed inspections
11. The challenges regarding local government financing and organisation
12. Assessing and addressing the demands on the service following the United Kingdom's exit from the European Union
13. Addressing the demands on the service from the Food Standards Agency "Regulating Our Future" programme

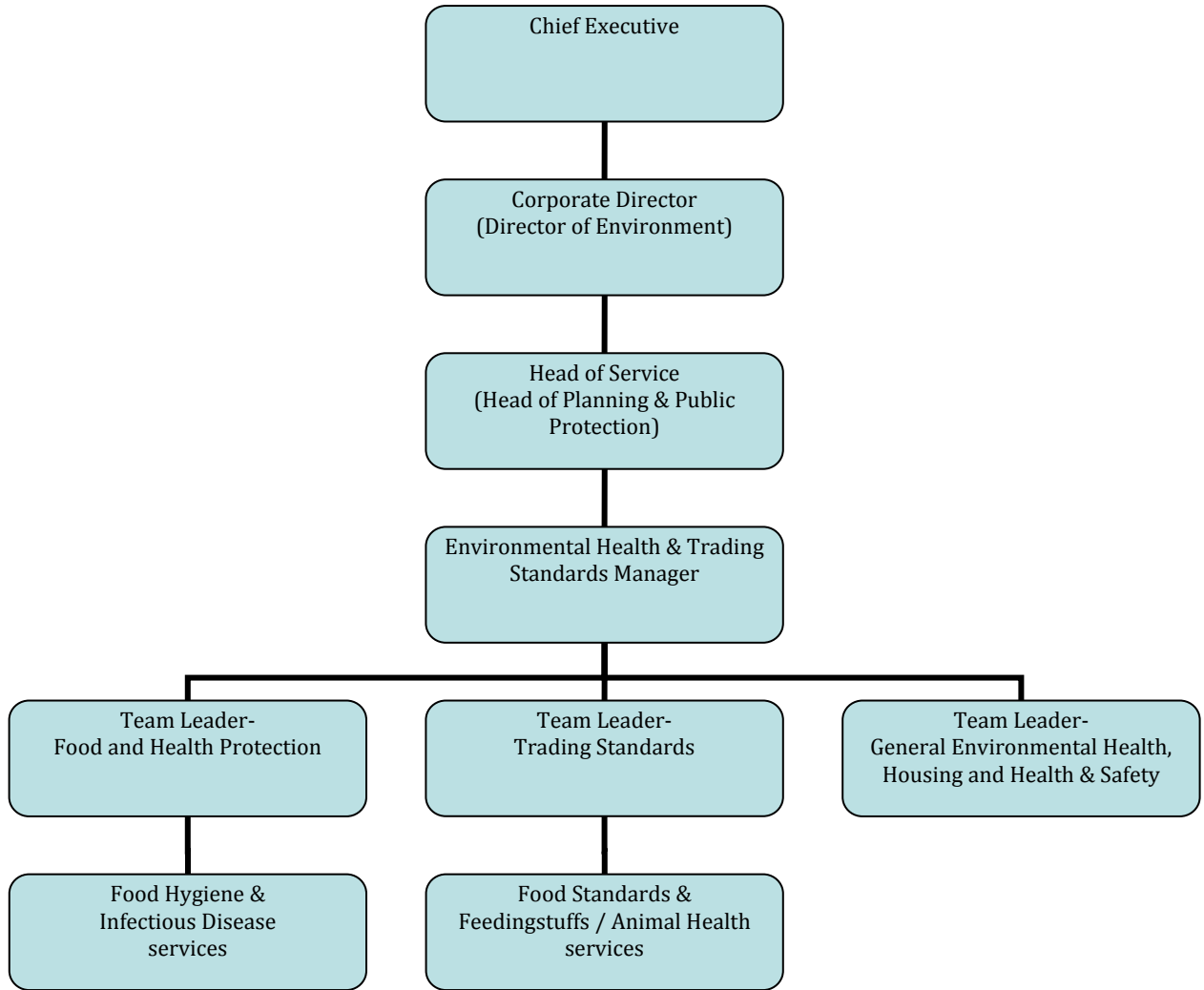
APPENDIX A

Decision Making Structure:



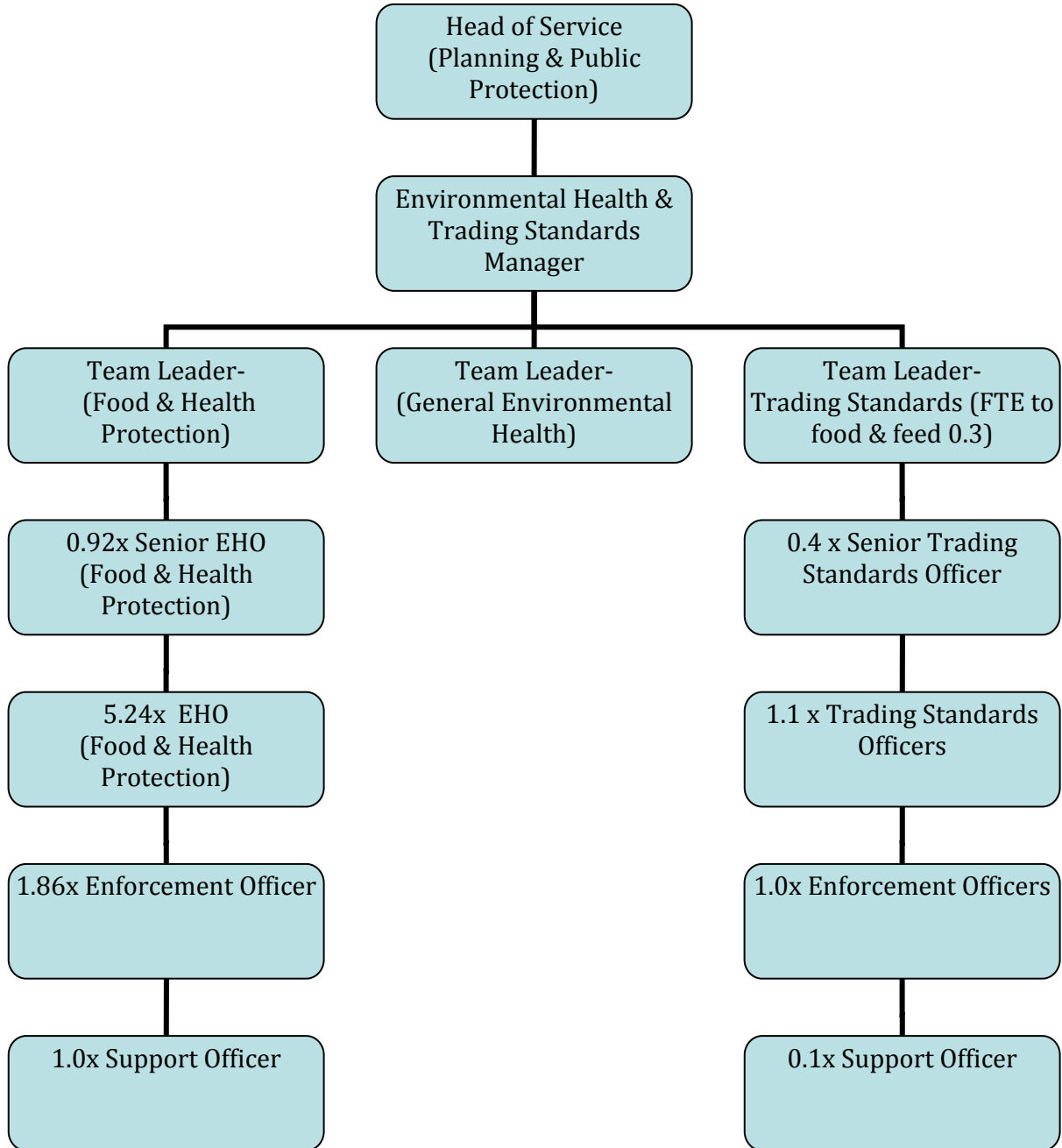
APPENDIX B

Department Structure:



APPENDIX C

Service Structure: (As at 1/4/2019)



APPENDIX D

Number of Registered Food Premises by Ward (2018 & 2019)

WARDS :	(WARD CODES)	2018	2019	WARDS:	(WARD CODES)	2018	2019
NEATH				PORT TALBOT			
Aberdulais	ABD	15	14	Aberavon	ABV	77	73
Alltwen	ALL	14	14	Baglan	BAG	41	37
Blaengwrach	BLA	12	12	Briton Ferry East	BFE	43	43
Bryncoch North	BRN	22	19	Briton Ferry West	BFW	13	12
Bryncoch South	BRS	36	33	Bryn and Cwmavon	BRY	52	49
Cadoxton	CAD	11	12	Coedffranc Central	COC	44	39
Cimla	CIM	21	20	Coedffranc North	CON	10	13
Crynant	CRY	15	13	Coedffranc West	COW	43	41
Cwmllynfell	CWM	14	12	Cymmer	CYM	32	27
Dyffryn	DYF	26	21	Glyncorrwg	GLC	10	8
Gwaun-cae-Gurwen	GCG	26	23	Gwynfi	GWY	11	11
Glynneath	GLN	36	32	Margam	MAR	46	45
Godrergraig	GOD	7	8	Port Talbot	POR	75	71
Lr Brynamman	LBR	8	8	Sandfields East	SAE	42	40
Neath (East)	NEE	44	42	Sandfields West	SAW	38	32
Neath (North)	NEN	149	132	Taibach	TAI	41	39
Neath (South)	NES	21	18	Port Talbot area Total		618	580
Onllwyn	ONL	10	9				
Pelenna	PEL	9	11	Other / Out of area	xxx	0	0
Pontardawe	PON	91	88	NPT Combined Total		1309	1222
Resolven	RES	21	21				
Rhos	RHO	12	14				
Seven Sisters	SEV	18	17				
Tonna	TON	19	15				
Trebanos	TRE	7	8				
Ystalyfera	YST	27	26				
Neath area Total		691	642				

Appendix 2

ENVIRONMENTAL HEALTH AND TRADING STANDARDS SERVICE Review of Food and Feed Law Enforcement Performance 2018 / 2019

1.0 Introduction

This document is the annual food and feed law enforcement performance review to measure compliance with the Food Enforcement Framework and has been submitted to the Head of Planning and Public Protection for approval.

2.0 Planned inspections/interventions 2018/2019:

2.1. Food Hygiene:-

RISK CATEGORY	NUMBER OF PREMISES CARRIED FORWARD	BALANCE OF NEW / OLD INTERVENTIONS DUE / PLANNED BY 31/3/2019 (TO EXCLUDE ANY PREMISES WHICH CEASE TRADING)	NUMBER PREMISES INSPECTED / INTERVENTIONS ACHIEVED AS AT 31/3/2019	OUT-TURN / ACHIEVED
High Risk:-				
A	0	6	6	100%
B	0	53	53	100%
C	0	306	306	100%
Low Risk:-				
D	0	74	72	97%
E	0	81	81	100% (mainly via AES: Alternative Enforcement Strategy) .

Commentary:

Resources were prioritised on undertaking all High Risk food premises. An initiative to address 'Category E' rated premises was completed, using the flexibility permitted under the Food Law Code of Practice, which involved issuing a self-assessment questionnaire as part as an Alternative Enforcement approach, with all results reviewed and a 10% sample visited for confirmation, plus any non-responders.

2.1.1 Broadly Compliant PI: (PAM009)

The out-turn PI for 2018/19 was : 93.92% (based on 998/1052 premises achieving a 3/4/5 FH Rating).

2.1.2 Food Hygiene Ratings:

609 Food Hygiene inspections were undertaken, and Food Hygiene Ratings issued where applicable;

43 Food hygiene re-ratings were applied for and progressed;

The FSA website had regular uploads of data (at least every 28 days), and additional ad-hoc uploads were undertaken to take account of important in-month changes.

2.2 Food Standards : Planned Interventions

RISK CATEGORY	NUMBER OF PREMISES CARRIED FORWARD	BALANCE OF NEW / OLD INTERVENTIONS DUE / PLANNED BY 31/3/2019 (TO EXCLUDE ANY PREMISES WHICH CEASE TRADING)	NUMBER PREMISES INSPECTED / INTERVENTIONS ACHIEVED AS AT 31/3/2019	OUT-TURN / ACHIEVED
A (every 12 months)	0	13	13	100%
B (every 24 months)	3	98 (3 old + 95 new)	67	68%
C (every 5 years)	94	150 (94 old + 56 new)	33	22%
UNRATED (not yet visited)	256	256	39	15%

Resources were directed to inspecting the A, B and Unrated businesses within the county borough. Certain “C” rated premises are being prioritised due to the nature of the business, the department has identified that many takeaways are risked as “C”, but due to the hazards associated with allergens and breaches of food description in this trade sector they are being targeted for more comprehensive intervention. Food standards inspections of specific C rated and some unrated businesses where it is felt that controls are likely to be robust and more than adequate will be carried out by environmental health officers during their food hygiene inspections. These businesses are referred back to Trading Standards as necessary. Trading Standards is generally intelligence led. Analysis has identified that the main areas of concern for food standards reside in catering premises, particularly in addressing concerns on allergens, presence of illegal or

restricted colours and the adulteration or substitution of food. The service continues to participate in coordinated operations and enforcement in the field of food supplements, an area that is complex and has been the subject of numerous food safety warnings. Consequently, the department is directing resources to this area.

Progress on interventions and quality checks are monitored by the Trading Standards Team Leader via spot checks, accompanied visits, annual appraisals and quarterly staff review meetings.

2.3 Feed Standards : Planned Inspections

Feed enforcement within Wales is funded directly by the Food Standards Agency, and administered by the Welsh Heads of Trading Standards (WHOTS). Wales is divided into regions, Neath Port Talbot and Swansea form one of these regions. Co-ordination across the Swansea / Neath Port Talbot area is delivered by an officer from Swansea Trading Standards, the Trading Standards Team Leader in Neath Port Talbot acts as liaison with Swansea.

The feed inspection and sampling programme is drafted by WHOTS and the FSA based on the feed registers from each authority. The FSA categorises feed businesses by feed registration and approval type. These businesses are required to be inspected during the forthcoming year. Each region is expected to carry out interventions at those premises.

Neath Port Talbot and Swansea met their feed inspection targets last year. Whilst there were in-year changes to the registration and approval register, replacement businesses were identified for inspection with agreement from the FSA.

Type of Business: Feed Standards	Allocation for NPT from region	Inspected by NPT
Manufacturer A01-08 & R01-04	1	2
Co Product Producer R12	4	2
Mobile Mixer R04	0	0
Importers	0	0
Stores R09 includes Amazon, Briton Ferry Stevedoring, Cimla Equestrian Centre, remaining ones are farms	1	0
Distributor A01-08, R01-03 & R05	2	2
Transporter R08 No transporters in NPT	1	0
On Farm Mixer R10 (Annex II)	1	0
On Farm Mix R11	0	1
Pet Food Manufacturer R06	1	1
Supplier of feed materials/Surplus Food R07	0	6
Total "Above The Line"	11	14
Livestock farms R13	35	32
Arable Farms	0	1
Total Premises to inspect	46	47

The service met its feed inspection commitment for 2018/19. There were in year changes of functions and some premises had closed which accounts for the disparity in targeted premises and those that had actually been inspected.

There have been issues with the delivery of the feed enforcement service across Wales, but nothing specific to Neath Port Talbot / Swansea. There are regular discussions on restructuring the arrangements, but nothing has been confirmed as yet. Any changes to delivery arrangements would take effect from April 2020 at the earliest.

3.0 Samples:

3.1 Food Hygiene:-

Samples were mainly taken in accordance with the National Sampling priorities, as agreed via the Welsh Food Microbiological Forum (WFMF). Additionally, local sampling initiatives were undertaken to increase the monitoring of locally available products, and to maximise the benefit of sampling allocations - in conjunction with Wales Public Health Laboratory, based at Glangwilli Hospital, Carmarthen. During the period 1/4/2018 - 31/3/2019, 275-samples were taken, of which 165 were Satisfactory; and 72 were classed as Borderline (but not a fail), and 38 were Unsatisfactory. Satisfactory samples do not attract any further action.

All borderline samples are followed up with an advisory letter to encourage reviews of pertinent controls, such as temperature controls; stock rotation; handling practices.

All unsatisfactory results are subject to follow up actions ranging from providing advice regarding improvements to undertake, together with further sampling, through to removing products from sale and taking robust enforcement action.

3.2 Food Standards

The Trading Standards Team Leader stood down as chair for the Glamorgan Food Group following arranging 2019/20 sampling programme. The Senior TSO will now represent the authority on the group.

Sampling initiatives are intelligence led, and last year focussed on:

- **Acrylamide survey** Commission Regulation (EU) 2017/2158 took effect from April 2018. Acrylamide is a chemical substance formed when starchy foods, such as potatoes and bread, are cooked at high

temperatures (above 120°C). It has been linked to cancers in small animals. No significant breaches were detected locally.

- **Colours and description at takeaways.** Intelligence indicates that non permitted colours and substitution and mis-description of food at catering establishments is still a problem. A number of breaches have been detected locally and these are currently being investigated.
- **Food Supplements.** Significant numbers of infringements have been detected in this area, from labelling to composition including the presence of banned substances. The nature of the manufacture and distribution of these products in gyms, health clubs and the internet has meant that they can be difficult to detect. Potentially there is a significant health risk associated with these products. There have been some breaches related to labelling that has been referred on. Where previously undetected businesses have been identified, they will be subject to sampling.
- There was also a free cross border allergen training event, jointly held by Swansea and Neath Port Talbot in the Guildhall in Swansea. Take up by NPT Food Business Operators was poor, this has been put down in part to a failure to publicise extensively and as well as the time and location of the venue. It is agreed that these events are useful and these issues will be addressed at the next event.
- The authority participated in a national survey of local meat product suppliers. 4 samples were taken, no significant breaches were detected.
- Finally, the authority also participated in the OPSON this year. OPSON is an annual intelligence led, European wide food survey, which this year focussed on organic claims at local producers. No infringements were detected.

- The department also participated in joint inspections with Food hygiene to promote greater understanding of each discipline and to encourage sharing of information, these were successful and will be a more regular event in the future.

Sampling and any subsequent investigations are monitored by the Trading Standards Team Leader and Senior Trading Standards Officer via spot checks, annual appraisals and quarterly staff review meetings.

3.3 Feed Standards

The new regional co-ordinated framework agreement has led to more support being available for taking samples. As part of the regional sampling programme and in line with the national priorities for sampling, the service took 3 samples. The samples were taken to identify levels of carcinogenic mycotoxins in farm feed, and animal proteins of former foodstuffs redirected to animal feed. There were no sample failures.

4.0 Service requests / reactive work:

4.1 Food Hygiene:-

Service requests- all types = 802

Of which:-

FNA (Food new business- advice for speculative start-up) = 29.

FNB (Food new business- advice & advisory interventions prior to trading) = 118.

FNC (Food new business- trading) = 37.

Also, the Food & Health Protection service received the following:-

Infectious Diseases- notifications of cases/incidents = 280.

Whilst target response times have been established for all service requests, a further analysis will be undertaken to ensure that they remain fit for purpose, and that prioritisation of resources (in accordance with lean systems principles) will ensure the best utilisation of resources, whilst managing expectations of service requestors.

4.2 Food & Feed Standards

The department received 7 requests for food advice last year that were not as the result of an intervention. These varied from business start-ups to specific issues.

There were no requests for feed advice.

Through the Citizens Advice Consumer Service (CACS) and other means, the department received 54 food complaints during 2018/19. Most of the complaints related to the sale of out of date food (best before and use by), however there were an increasing number relating to allergen declaration. The businesses were advised and follow action taken as appropriate. No feed complaints were received.

The department received 153 food alerts. The majority of these were allergy alerts, regarding food that failed to declare the presence of an allergen or did not display the presence prominently enough. As with Food hygiene these are mainly dealt with by support staff. Where necessary they will be escalated by the Trading Standards Team Leader. No feed alerts were received.

Requests for advice and complaints are fed into the authority's intervention plan which in turn leads to the identification of priorities and work areas for the forthcoming year.

Response times and investigations / advice are monitored by the Trading Standards Team Leader and Senior Trading Standards Officer via spot checks, annual appraisals and quarterly staff review meetings.

5.0 Promotional work:

5.1 Food Hygiene promotional work:-

The service was able to use various social media platforms to pass on messages relating to food safety topics- particularly the re-tweeting of information from the Food Standards Agency and the promoting of food hygiene premises which gained a 5 rating.

5.2 Food Standards Promotional work:-

The section has assisted other departments in promoting business support and advice sessions by contacting local FBOs (Food Business Operators) to raise awareness of planned events.

In conjunction with Swansea Trading Standards and the Food Standards Agency, the department ran allergen training events aimed at caterers at the beginning of the year.

The service has access to the EH&TS social media accounts and is active in promoting consumer, business advice and Trading Standards activity and enforcement.

The service also had a high-profile prosecution of Marley Foods Cwmgors Limited in conjunction with food hygiene, and press releases were issued as a result. :

[Marley Foods Cwmgors Press Release](#)

5.3 Feed Standards Promotional Work

New feed businesses are regularly identified and contacted to ensure that they are properly registered.

6.0 Primary Authority:

6.1 Food Hygiene, Food Standards and Feed Standards-

The Primary Authority scheme is UK wide and each LA must have regard to any established partnerships between businesses and regulators. Whilst currently there are no food business partnerships which NPT are responsible for, there are many which NPT must have regard to during the inspection of premises within the borough.

Where such partnerships exist, and cover businesses operating with NPTCBC, the service liaises with the relevant LA's to give general feedback following inspections which are subject to an agreed (UK wide) inspection plan, and specific feedback where breaches are detected.

NPT Trading Standards have embarked on their first Primary Authority relationship. This is with a non-food business. The service is now looking to expand its portfolio to English based companies seeking Welsh partners for devolved matters and local businesses that will benefit from the arrangement.

7.0 Safety Incidents:

7.1 Food hygiene:-

No food safety incident reports (e.g. withdrawals) necessitated initiation by EH of NPTCBC.

All notifications of withdrawals requiring specific action are prioritised.

7.2 Food Standards

No food safety incident reports (e.g. withdrawals) necessitated initiation by TS of NPTCBC.

All notifications of withdrawals requiring specific action are prioritised.

7.3 Feed Standards

No Feed safety incidents were recorded.

8.0 Staff Development / Training / Continuing professional development:

8.1 Food hygiene:-

All staff have achieved their expected CPD (which has been set at a minimum of 10 hours per calendar year, although this is due to change to 20 hours p.a. next year); additionally:

1 officer (REN) continued a secondment in the General EH team until Dec 2018, to deal with workload pressures. A second officer post has been seconded into the General EH team for 18 months to coincide with a project on Empty Homes.

The team has continued to implement the findings of the Food Service system review, including the closer working relationship with Trading Standards in respect of combining certain Food Standards inspections and the Agile working pilot. Five members of staff within the General Environmental Health team obtained the certificate of Registration of the Environmental Health Registration Board (EHRB). EHRB is a requirement under the Food Law code of Practice for Officers to be able to inspect Food businesses for food hygiene purposes. This gives the service greater flexibility to allocate staff resources for food hygiene if required.

8.2 Food Standards

All food qualified officers met their required 10 hours CPD in 2018/19. Training was achieved by a combination of courses run by the Food Standards Agency, Welsh Heads of Trading Standards, online courses run by the FSA and workshops run within Neath Port Talbot. The CPD requirement has recently been revised to 20 hours, which includes active enforcement.

8.3 Feed Standards

Only one member of the team met their required 10 hours CPD in 2018/19. This was due to a lack of opportunities for training. This has been identified by the Trading Standard Team Leader and Senior Trading Standards Officer who have already begun a programme of in house seminars to address the issue. One seminar was held in April, and another is due in August. The FSA has provided more training courses since the 1st of April, consequently CPD requirements should be met for 2019/20.

Two officers carry out the feed inspections on farms which is the bulk of the enforcement programme, these officers are required to be competent, but don't necessarily need a specific qualification. There are a smaller number of feed inspections at factories and stores that need to be carried out the TSOs who are specifically qualified.

9.0 Monitoring:

9.1 Food hygiene monitoring:-

LAEMS (Local Authority Electronic Monitoring System) data is provided annually to the Food Standards Agency - which gives detailed information on the key performance statistics for each Council across the UK, for submission to EU. The detail covers areas such as: intervention totals and by risk category; enforcement actions; number of premises by type and risk categorisation; samples taken; staffing levels; certain service requests etc. On a quarterly basis key performance indicators are reported to Scrutiny Committee and the associated Cabinet Board, and are publically available. Line managers keep track of inspection targets, and the reactive workloads on a monthly basis, or more frequently when required.

9.2 Food & Feed Standards monitoring:-

LAEMS data is provided annually to the Food Standards Agency - which gives detailed information on the key performance statistics for each Council across the UK, for submission to EU. The detail covers areas such as: intervention totals and by risk category; enforcement actions; number of premises by type and risk categorisation; samples taken; staffing levels; complaints etc.

Each officer's intervention programme is set at the beginning of the year. This is reviewed and updated during the relevant officer's quarterly review. Section progress is checked on a quarterly basis, key performance indicators are reported to Scrutiny Committee and the associated Cabinet board, and are publically available.

The TS Team Leader and Senior Trading Standards Officer monitors officer inspection targets and reactive workloads formally during the quarterly review. If issues with performance are identified, this frequency is increased. Food / Feed Aide Memoires and post inspection reports are reviewed by the Trading Standards Team Leader and Senior Trading Standards Officer.

Feed standards inspections progress is fed back to WHOTS and the FSA via the regional lead officer, based in the City & County Of Swansea. The Trading Standards Team Leader and regional lead identify and address issues with performance against the inspection programme

10.0 Review of Policies/Procedures

10.1 Food Hygiene / Food Standards / Feed Standards:

All major food policies and procedures are kept under review, with in-year updates made when necessary. This year the enforcement policy and infringements reporting procedure have also been amended.

Following a systems review of the services, the food hygiene and trading standards services have become the pilot for “agile working” within the authority. This has meant a change from paper based to digitally based recording, officers not requiring fixed desks and working remotely, which has introduced new challenges for management and support services. The two services are trialling different means of recording interventions electronically it is anticipated that by 2020/21 one of these systems will be formally adopted. Despite some technical and cultural issues, the pilot has been seen as a success and will be developed further.

In light of mounting budgetary pressures, a new Policy for charging for Business Advice was introduced.

11. Conclusions

Food hygiene, and Food & Feed standards enforcement remains a priority for the service.

Food hygiene inspection resources were prioritised on undertaking all high risk food premises. The broadly compliant indicator remains consistently high - this is a National Performance Indicator. National and local food sampling initiatives were carried out throughout the year, and we will continue to make use of sampling resources made available.

The section will continue to exploit the regional connections that have been forged in respect of feed delivery.

Regional working and intelligence gathering should continue to be developed and there are clear priorities for the service in relation to both food and feed and these need to be addressed, but without ignoring other issues that are appearing on the horizon, such as EU Exit.

12. Review of report by Head of Service

I have reviewed and approve of this report.

A handwritten signature in black ink, appearing to read "Nicola Pearce", is placed on a white rectangular background.

Nicola Pearce
Head of Planning and Public Protection