



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

NEATH PORT TALBOT COUNCIL

Regeneration and Sustainable Development Cabinet Board

30th July 2021

Report of the Head of Planning and Public Protection

Ceri Morris

Matter for Information

Wards Affected: All

Environmental Health and Trading Standards – Food & Feed Law Enforcement Review 2020-21 and Food & Feed Service Delivery Plan 2021-22

Purpose of the Report

To provide a review of the Authority's Food & Feed Law Enforcement Review for 2020-21 and inform Members of the Food & Feed Service Delivery Plan for 2021-2022.

Executive Summary

The review for the Food & Feed Law Enforcement Service for 2020-21 illustrates the severe impact that Covid-19 has had on the delivery of the service over the period and is primarily as a result of the teams being at the forefront of the response – i.e. Contact Tracing; providing advise/support for Care Homes; and the interpretation and enforcement of the changing guidance and Regulations issued by Welsh Government to control the spread of Covid-19.

Notwithstanding these challenges, and as the Food Hygiene and Food & Feed Standards enforcement remains a priority, the service has prioritised resources in accordance with the Food Standards Agency (FSA) guidance and 'Recovery Plan'.

Food hygiene inspection resources 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 albeit at a reduced level, and the service 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.

Feed/Feeding-stuffs Standards work continues to be delivered regionally, in conjunction with the City & County of Swansea (as funded directly by the FSA). The cross-border arrangements continue to be a success.

Due to the re-prioritisation of Food Hygiene, Food Safety and Feed inspections as a result of the effect of the Covid Pandemic, there is a considerable backlog of inspections required to be undertaken. The FSA Recovery Plan provides guidance for Local Authorities to assist with the consistent prioritisation of resources to areas deemed appropriate.

Food Hygiene and Food Standards resources continue to be prioritised on interventions at high risk premises. Consequently, the Food Standards service had a large number of interventions overdue at some premises (even prior to the Covid-19), demonstrating that the allocated resource for food standards delivery is insufficient and is unlikely to change due to the Forward Financial Plan requirements imposed on the service.

It is also notable that there is a national shortage of qualified and competent officers who can undertake Food Hygiene and Food/Feed Standards inspections, which results in ongoing pressures on the service, particularly when officers leave the service for any reason (e.g. maternity leave or retirement).

Background

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

- Help maintain a safe and healthy environment in the County Borough.

- 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.
- Ensure the effective control of feed destined for consumption by animals entering the food chain and pet animals.
- 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.
- 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.
- Ensure that resources are targeted where they are most effective and address areas of highest public health risk.
- Respond to requests for advice and to seek to raise awareness of food safety and food & feed standards issues.
- 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.

Food and Feed Law Enforcement Review 2020/21

The Authority must carry out an annual food and feed law enforcement performance review as part of the Framework Agreement (2010) with the Food Standards Agency (FSA), this review is attached at Appendix 1.

The framework agreement sets out the planning and delivery requirements of feed and food official controls, based on the existing statutory Codes of Practice.

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.

Food and Feed Service Delivery Plan 2021/22

The proposed Service Delivery Plan, attached as Appendix 2, sets out the way in which the Environmental Health and Trading Standards Service intends to deliver food and feed law enforcement during the period 2021-2022.

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.

Impact of Covid-19

The FSA acknowledge that staff across the profession have been re-deployed from routine Food safety work to prioritise responding to the Covid Pandemic.

Within Neath Port Talbot, 50% of the Food and Health Protection team were redeployed to form the Council's Regional TTP team and remain there to this day. The remainder of the team provided health protection guidance and support to all Care Homes across the County Borough. Furthermore, officers who would ordinarily deal with Food Standards and Feed were also deployed to assist with Regional TTP and Covid Enforcement complaints and as such routine or 'business as usual' work had to be suspended as a consequence.

Financial Impacts

No implications.

Integrated Impact Assessment

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

Valleys Communities Impacts

No implications.

Workforce Impacts

No implications.

Legal Impacts

No implications.

Risk Management Impacts

No implications.

Consultation

There is no requirement for externally consultation on this matter.

Recommendations

Not applicable – matter for information.

Reasons for Proposed Decision

Not applicable – matter for information.

Implementation of Decision

Not applicable – matter for information.

Appendices

Appendix 1 – Food and Feed Law Enforcement Review 2020/21.

Appendix 2 – Food and Feed Service Delivery Plan 2021/22.

List of Background Papers

None.

Officer Contact

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APPENDIX 1

Food and Feed Law Enforcement Review 2020/21

1.0 Introduction

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

2.0 Planned Inspections / Interventions 2020/2021

2.1.0 Food Hygiene

Due to the Covid-19 pandemic, the Food Standards Agency (FSA) issued guidance regarding the unprecedented impact that was being faced by Local Authorities, and particularly Public Protection Departments, with staff resource often being redeployed away from routine food safety tasks, and accordingly acknowledged that priorities would rightly focus on the Covid response and a select range of important food safety work areas.

It was acknowledged that most proactive inspections of food premises would be suspended, both to reduce footfall in all but the most serious situations, and to free up staff resource. However, certain key reactive tasks which had public health significance or statutory imperatives were highlighted as important to maintain. Examples of which included responding to food poisoning outbreaks, food controls for import and export purposes, approved premises inspections, fishing and shellfish industries, as well as investigations of food fraud or situations which would impact significantly on public health.

FSA guidance kept pace with changing National Alert levels, and towards the end of Quarter 4 (which coincided with the wider roll out of Covid Vaccines), a move to developing strategies for recovery was commenced, both for the short term (to 30th June 2021) and the longer term (to 31st March 2023).

Consequently, the number of proactive inspections was significantly scaled back to release and re-focus (flex) resource into Covid control, particularly supporting Care Homes and taking the lead with the Regional TTP (Test, Trace and Protect) service. Additional resource was bought in from Locum EHO staff, although demand was higher than availability, both for short term and longer term assignments.

Pro-active Inspections – by Risk Band Category

RISK CATEGORY	BALANCE OF NEW / OLD INTERVENTIONS DUE / PLANNED BY 31/3/2021 (TO EXCLUDE ANY PREMISES WHICH CEASE TRADING)	NUMBER PREMISES INSPECTED / INTERVENTIONS ACHIEVED AS AT 31/3/2021	OUT-TURN ACHIEVED /
High Risk:-			
A	2 premises (due 2 visits each)	2 premises (but received 1 visit each)	50%
B	51	25	49%
C	335	23	7%
Low Risk:-			
D	62	0	0%
E	269	0	0%

Commentary

Resources were prioritised on reactive work, particularly of public health risk or significance, as well as facilitating new businesses to become registered and gain a degree of start-up advice. Where resource was available to undertake proactive inspections, this was focused towards premises in higher risk bands or where local intelligence suggested an intervention was necessary.

2.1.1 Broadly Compliant PI: (PAM009)

The out-turn PI for 2020/21 was: 95.99% (based on 959/999 premises achieving a 3/4/5 FH Rating).

2.1.2 Food Hygiene Ratings:

- 50 Food Hygiene inspections were undertaken, and Food Hygiene Ratings issued where applicable;
- 3 Food hygiene re-ratings were applied for and progressed.

Given the redeployment of resources and the reduced number of inspections undertaken, it was not always possible to provide the FSA website with regular uploads of data (at least every 28 days). However, ad-hoc uploads were undertaken to take account of batches of changes.

2.2 Food Standards: Planned Interventions

Risk Category	Number of premises carried forward	Interventions planned by 31/3/2021 (exc. ceased trading but Inc. carried forward premises)	Number of Interventions Achieved as at 31/3/2021	Completed
A	0	17	11	65%
(every 12 months)				
B	112	234	40	17%
(every 24 months)				
C	31	128	16	13%
(every 60 months)				
Unrated (not yet visited)	174	174	14	8%

The Covid-19 pandemic meant that normal intervention programmes were suspended. Trading Standards & Animal Health (TSAH) staff were redeployed to Covid-19 enforcement and the Test, Trace and Protect teams (TTP). This left a skeleton staff for TSAH and specifically food and feed.

Whilst extra staff were recruited for Covid enforcement and TS staff were released from that duty, extra TSAH staff were deployed into TTP up until January 2021.

Despite recruitment of a consultant to cover some food enforcement work, the restrictions on movement and opening of businesses and diversion of resources had a significant effect on food service delivery. Some interventions were completed, but enforcement was in the main, reactive.

Whilst the sampling programme was largely suspended, the service did carry out a sampling exercise following a successful bid for sampling from the FSA. Sampling was directed at the takeaway sector to gather intelligence, specifically on non-declared allergens and breaches of food description legislation.

Where officers were not carrying out Covid-19 related work, and unable to carry out physical inspections, they were tasked with “virtual” web-based visits and telephone interviews on targeted businesses.

Existing businesses and new start-ups reacted to the pandemic by moving online, advertising and selling via virtual shop fronts or takeaway “banners”, or social media. Other catering businesses pivoted to provide takeaway meals, delivery and mail order. This added

to the backlog of interventions and increased focus on the information that businesses are providing on-line, particularly in respect of allergens and description.

2.3 Feed Standards: Planned Inspections

Feed enforcement within Wales is funded directly by the FSA, and administered by Trading Standards Wales (TSW) – formerly Welsh Heads of Trading Standards (WHOTS). Wales is divided into regions, Neath Port Talbot and Swansea form one of those regions. Coordination across the Neath Port Talbot / Swansea area is delivered by Neath Port Talbot TSAH.

The feed inspection and sampling programme is drafted by 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 inspect a set number of businesses within their areas.

The inspection obligation for the region had increased significantly for the year. However, for the reasons outlined in the Food Standards section of this document, the Neath Port Talbot / Swansea region was unable to meet their feed inspection obligation for the year. However, reactive work continued as did activity on an ongoing investigation.

Feed Standards Inspection Programme			
Type of Business:	Usage code	Allocation for NPT from region	Inspected by NPT
Manufacturer	A01-08 & R10-04	0	0
Co Product Producer	R12	0	0
Mobile Mixer	R04	0	0
Importers		0	0
Stores	R09	3	0
Distributor	A01-08, R01-03 & R05	6	0
Transporter	R08	1	0
On Farm Mixer	R10 (annex II)	1	0
On Farm Mix	R11	4	0
Pet Food Manufacturer	R06	1	0
Supplier of feed materials/Surplus Food	R07	13	0

Total "Above The Line" premises (businesses that treat or supply feed)		29	0
Livestock farms R13	R13	40	4
Arable Farms	R14	1	0
Totals		53	4

The obligation for the forthcoming year has yet to be confirmed, but it is hoped that the Food Standards Agency will take the other pressures and the changes in working practices into account when drafting.

Intelligence regarding Food & Feed breaches are shared with partners, such as food hygiene team, the National Food Fraud Unit and National Trading Standards via the National intelligence database and used to identify priorities for the service.

3.0 Samples

3.1 Food Hygiene

Sampling was deferred in light of advice from FSA, and the Covid related pressures on the Food & Health Protection service.

3.2 Food Standards

The 2020-21 sampling plan was abandoned due to the pandemic and the pressures on LAs and diversion of resources.

For 2021-22 the Trading Standards Team Leader has again taken the role of chair for the Glamorgan Food Group and coordinated the drafting of the forthcoming sampling plan.

The proposed Glamorgan Group Sampling Plan:

QTR 1	Kebabs – presence of undeclared allergens (milk)
QTR 2	Fresh Meat Claims. BBQ season. Select produce from butchers claiming fresh and test for previously frozen. To include quality of meat if in a marinade.
QTR 3	Left Blank to accommodate FSA funded project (to be confirmed).
QTR 4	Vegan/Vegetarian claims. With the increased number of consumers embarking on a vegan diet, description of pre packed foods from catering establishments.

The TS service was however successful in bidding for funding for sampling for a takeaway exercise. Breaches of description, specification, allergen and colours continue to be a problem at Neath Port Talbot takeaways. No serious breaches have been detected, but with the numbers of businesses selling takeaway food and food via the internet as a result of

lockdown, it is anticipated that non declaration of allergens and misdescription will become a problem.

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. Breaches are shared with partners, such as Food Hygiene, the National Food Fraud Unit and National Trading Standards via the National Intelligence database and used to identify priorities for the service.

3.3 Feed Standards

Again, due to the pandemic the FSA dictated that the sampling programme was suspended. However, the service took 2 samples as part of an ongoing investigation into salmonella contamination at a local pet feed producer. At the time of writing an appeal into an improvement notice issued on the business in January 2020 is being heard.

4.0 Service Requests / Reactive Work

4.1 Food Hygiene

Service requests – all types = 1,325. Of which:

- Health Protection service related (primarily Covid issues) = 713;
- Food service related = 566; and
- Miscellaneous = 46.

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

- Infectious Diseases – notifications of cases/incidents = 232 (excluding Covid work).

Target response times have been established for the main service requests categories, and analyses are undertaken to ensure that they remain relevant and commensurate with the prioritisation of resources (in accordance with lean systems principles) to ensure the best utilisation of resources, whilst managing expectations of service requestors.

4.2 Food & Feed Standards

Trading Standards Reactive work

Subject Area	Quantity	Narrative
Food Advice Requests	5	These were mainly from business start-ups with only one existing business requesting labelling advice.
Feed Advice Requests	4	One product request, the others related to business start-ups and registration.
Food Complaints	58	A broad mix of complaints, from food sold past durability date (use by and best before) to presence of undeclared allergens, foreign labelled food (safety issues in respect of ingredients and lack of allergens declarations, counterfeit alcohol and foreign bodies.
Feed Complaints	1	The sole complaint was in respect of a business that is already under investigation.

Requests for advice and complaints and patterns of food alerts are fed into the Trading Standards & Animal Health service's intervention plan and the national intelligence database 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 FSA. Unfortunately, due to pandemic pressures and diversion of resources, it was not possible to routinely tweet / promote food hygiene premises which gained a 5 rating.

5.2 Food Standards Promotional Work

Promotional work was curtailed during 2020-21. However, Trading Standards & Animal Health service used the restriction on normal enforcement activity to develop better systems for monitoring and sharing information on social media and to forge closer links with Council services that support business, such as Economic Development.

The TS service now has Twitter, Facebook and Instagram accounts, the latter is being trialled for effectiveness in reaching consumers and businesses. The Twitter account has proved to be a success.

5.3 Feed Standards Promotional Work

New feed businesses are regularly identified and contacted to ensure that they are correctly registered or approved.

6.0 Primary Authority

6.1 Food Hygiene, Food Standards and Feed Standards

The Primary Authority scheme is UK wide and each local authority must have regard to any established partnerships between businesses and regulators. Whilst currently the Authority has not embarked on any food or feed primary authority partnerships, there are many for which the services must have regard to during the inspection of premises within the County Borough. Additionally, the Trading Standards & Animal Health service is an active member of the Welsh Primary Authority Group – a forum for businesses and enforces to share knowledge and experiences of the Primary Authority system.

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

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 & Feed

No food safety incident reports (e.g. withdrawals) necessitated initiation by TS of NPTCBC.
All notifications of withdrawals requiring specific action are prioritised.

Subject Area	Quantity	Narrative
Food Alerts	75	As usual, allergy alerts took up the bulk of the alerts. Other than notification via social media, no other action was required of the Service, and they could be dealt with by support staff.
Feed Alerts	1	A sole feed alert relating to a pet feed business not based within NPT.

8.0 Staff Development / Training / Continuing Professional Development

8.1 Food Hygiene

Staff undertook various self-study sessions as the primary way of keeping abreast of new developments and the changing guidance during the year, particularly in relation to Health Protection regulations and Covid control guidance. Team meetings were held regularly via Microsoft TEAMS to ensure consistency of understanding and consistency of approach. Officers are expected to achieve a minimum of 20 hours per year of Continuing Professional Development (CPD).

8.2 Food Standards

All remaining food qualified officers met their required 20 hours CPD in 2020, partly due to the enforced layoff from regular enforcement duties and the proliferation of online courses following the lockdown.

The Trading Standards Team Leader occupies the Trading Standards Wales Training Officer role and distributes regular training opportunity updates.

It is anticipated that training in future will be a mix of short online sessions and more involved classroom sessions.

8.3 Feed Standards

Feed Standards has a CPD requirement of 10 hours per annum. The Covid lockdown meant that training delivery was difficult, and two officers did not meet their required 10 hours CPD in 2020/21. This will be addressed in 2021/22. The Trading Standards Team Leader and Senior Trading Standards Officer will resume a programme of in-house workshops as a means of helping maintain CPD.

Two officers carry out the routine 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 by 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 FSA which gives detailed information on the key performance statistics for each Council across the UK. 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 publicly available.

Line managers keep track of inspection targets, and the reactive workloads on a month by month basis, or more frequently when required.

9.2 Food & Feed Standards Monitoring

LAEMS data is provided annually to the FSA which gives detailed information on the key performance statistics for each Council across the UK, for submission to the 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 publicly 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.

Neath Port Talbot Trading Standards coordinated the Neath Port Talbot / Swansea feed region and inspections progress is fed back to Trading Standards Wales. The Neath Port Talbot Trading Standards Team Leader and Senior Trading Standards Officer identify and address issues with performance against the inspection programme.

10.0 Review of Policies/Procedures

10.1 Food Hygiene / Food Standards / Feed Standards

The pandemic caused some disruption to the regular, planned, reviews of food, feed and enforcement policies. However, during the year, the enforcement policy and infringements reporting procedure were reviewed and amended.

Additionally, certain other policies had to be developed afresh to account for the changes in working procedures, particularly relating to working effectively from home, and complying with Covid secure working. Fortunately, both services were already familiar with remote working principles and most officers were geared up for agile working. The enforced move to agile working for all officers has had its benefits, and it has sped up development of online

and remote working systems and procedures. These continue to be fine-tuned to account for new working procedures, for example the digital forms that were used by Trading Standards have already been replaced by new forms developed during the year.

With remote working, there comes a risk of staff feeling isolated. Managers have recognised the need to maintain communications with the teams, and where possible to facilitate colleagues seeing each other “in person” to ensure officers do not feel isolated and alone in their duties.

11. Conclusions

Food hygiene, Food standards & Feed enforcement remains a priority for the service, despite the challenges of the past year.

The challenge for the forthcoming year will be how to meet demands, and how to recover, whilst still reacting to the ongoing pandemic and the extra workload that imposes.

The past year has demonstrated the ability of staff across Public Protection to flex and respond to the pandemic, but this has resulted in substantial backlogs of certain routine work. Workforce planning and recruitment present challenges to Food Hygiene, Food Standards and Feed enforcement due to a national shortage of qualified or competent Officers and ongoing Covid pressures which require the Health Protection and enforcement skills evident in these Officers.

The FSA’s proposals on risk assessments appear to mirror Trading Standards’ increasing reliance on intelligence to target problem sectors and traders. It is anticipated that, as a pilot authority for the new food standards risk assessment scheme, they will be able to develop this further. If successful, the new risk assessment scheme should allow for better use of resources in dealing with food standards issues. Similarly, continued liaison with the Food Standards Agency in respect of feed delivery should focus resources on areas of most need.

Trading Standards & Animal Health were able to participate in some National and local food sampling initiatives during the year, and both services 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 and food standards.

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 such as EU Exit.

12. Review of Report by Head of Service

I have reviewed and approve of this report.



Ceri Morris

Head of Planning and Public Protection

APPENDIX 2



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

**Environmental Health
& Trading Standards**

FOOD & FEED LAW ENFORCEMENT SERVICE DELIVERY PLAN 2021-2022



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A	Decision Making Structure
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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 & feed safety issues are currently directed to a 24 hour emergency call out service and the officer on-call has access to senior food / feed officers in an emergency.

Officers are expected to carry out enforcement work outside of normal office hours, including evening and weekends meeting the demands of the 24 hour economy

Contact Details:

Service	Trading Standards & Animal Health	Food Hygiene & Health Protection
Correspondence	The Quays, Brunel Way, Baglan. SA11 2GG	The Quays, Brunel Way, Baglan. SA11 2GG
Telephone (Complaints)	03454 04 05 06 (Citizens Advice Consumer Service)	01639 686868
Telephone (Enforcement)	01639 686877/ 01639 686868.	01639 686868
Website (business and consumer advice information & contact details)	https://www.npt.gov.uk/tradingstandards	https://www.npt.gov.uk/1182
Email	tsd@npt.gov.uk	food@npt.gov.uk
Facebook	NptEnvHealth/TradingStandards	NptEnvHealth/TradingStandards
Twitter	@NPTTradingStds	@NPTEHTS
Instagram	@NPTTradingstds	

1.0 SERVICE AIMS AND OBJECTIVES

1.1 Purpose of the Service

Neath Port Talbot Council strives to ensure food safety from the primary producer / farm through the manufacturing, supply, retail and catering chain, to the ultimate consumer, this is known as the 'farm to fork' principle.

Local authorities are required to prepare a 'Service Delivery Plan' which details the delivery of their food safety enforcement responsibilities for the year ahead, and to undertake a review of the implementation of the previous plan.

The plan seeks to ensure that food and feed national priorities and standards are delivered locally with a balanced approach to enforcement. This is achieved by directing resources toward an inspection programme and ensuring that adequate provision is made to respond to reactive work such as complaints, food poisoning incidents, product recalls, and requests for advice from businesses and intelligence led projects.

Funding for feed enforcement comes directly from the Food Standards Agency (FSA) and is administered across Wales by Trading Standards Wales (TSW). Neath Port Talbot administers the funding for the region made up of NPT and City & County of Swansea.

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.
- 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.
- Ensure that resources are targeted where they are most effective and address areas of highest public health risk within the food chain.

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 & Animal Health 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 Council is a Unitary Authority, situated in South Wales and is a recognised statutory Food & Feed 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 approximately 1,641 food/feed premises within the County Borough in which food or drink or feed is produced, manufactured, processed, stored or sold, being circa 248 feed premises and circa 1,346 Registered food premises and circa 47 food premises which are Registered by other Local Authorities, but who frequently trade within NPT (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 with the service part of the wider Directorate of Environment & Regeneration.

The strategic management and delivery of the service is overseen by the Environmental Health and Trading Standards Manager.

The day to day service delivery of the Food Hygiene Services are overseen by the Team Leader – Food & Health Protection. The Team Leader – Trading Standards has responsibility for Food Standards, and Feed Standards and Hygiene.

External services are provided to the section by:

Laboratories	Complaint Referrals	Partnership & Support
Public Health Wales (formerly the Public Health Laboratory Service, PHLS) at West Wales General Hospital, Carmarthen – for food examination (Microbiological).	Citizens Advice Consumer Service	Food Standards Agency
Public Analyst: Minton, Treharne & Davies Limited – for food and feed analysis (Non- microbiological).	Food Standards Agency	City & County of Swansea (feed delivery within the NPT / Swansea region)
Public Analyst Scientific Services Limited – for food & feed analysis (Non-microbiological).	Other Local Authorities	Trading Standards Wales & The Glamorgan Group – for coordinated sampling programmes and guidance
		Contractors as service demand requires and resources allow

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 Team.

Other Trading Standards & Animal Health Service Functions	Other Food Hygiene & Health Protection Service Functions	Delivered via
Fair Trading	Coronavirus Enforcement	Inspection programmes
Product Safety	Health Promotion	Test purchasing programmes
Consumer Fraud	Investigation and control of communicable diseases	Provision of advice to businesses
Counterfeiting / Trademarks Enforcement		Sampling programmes
Weights & Measures / Metrology		Criminal investigations
Underage Sales		Internet / social media monitoring
Animal Welfare		Responding to national food / feed alerts and recalls
Petroleum Enforcement		Inspection of weighing & measuring equipment
Tobacco Control		Surveys & projects

When necessary, suitably competent and qualified food hygiene, food standards and feed 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 Services

Table 1(a): Total Number of Food & Feed Premises within the Authority	
Food Premises	Feed Premises
<p>1,393 known food businesses of which 1,346 are Registered with NPT, and 47 are Registered elsewhere.</p> <p>Once registered they can trade in any area.</p> <p>There are traders (mainly mobile traders) who are based outside NPT but regularly trade within NPT. These can be subject to official control interventions (usually co-ordinated with their local LA).</p>	248 known businesses

See Appendix D for numbers of premises by Ward area

Table 1(b): BREAKDOWN OF REGISTERED FOOD PREMISES, BY FSA CATEGORY				
CODE	REGISTERED FOOD PREMISES (BY FSA CATEGORY)	NO. OF PREMISES (2018/19)	NO. OF PREMISES (2019/20)	NO. OF PREMISES (2021/22)
F01	Primary Producer	2	1	1
F02	Manufacturer / Packer	26	28	30
F03	Importers / Exporters (EU)	0	0	0
F04	Distributor / Transporter	10	9	10
F05	Supermarket / Hypermarket	24	23	23
F06	Small Retailer	203	197	194
F07	Retailer / Other	92	91	143
F08	Restaurant / Café / Canteen	198	185	194
F09	Hotel / Guest House	12	12	15
F10	Pub / Club	191	186	184
F11	Takeaway	140	142	163
F12	Caring Premises	207	176	171
F13	School / College	79	75	73
F14	Mobile Food Unit	53	47	50
F15	Restaurants & Caterers – Other	135	100	94
F16	Importers / Exporters (3 rd Countries)	2	2	1

Table 1(c): BREAKDOWN OF ANIMAL FEED PREMISES, BY FSA CATEGORY.					
Code	Animal Feed Premises	No. of premises (2018/19)	No. of premises (2019/20)	No. of premises (2020/21)	No. of premises (2021/22)
A	Manufacturer Using / containing additives	2	2	2	2
B	Manufacturer Not Using Additives	3	3	3	3
D	On Farm Mixer Using Additives	1	1	1	1
E	Store - In Region Distribution	3	3	1	2
G	Distributor	0	0	0	1
I	Importer - Out Of Region Distribution	1	2	2	2
J	Surplus Food Supplier, Keeps Non Feed Products	12	8	9	6
K	Surplus Food Supplier, Keeps Non Animal By products	–	–	–	2
P	Co Product Producer - In Region	2	0	0	
S	Livestock Farm	283	216	233	216
T	Arable farm	17	10	13	11
U	Any Other Business	1	0	1	0
X	Not Known	1	1	1	1
Total:		326	246	271	248

Increased feed enforcement activity has meant that the department's feed premises records are becoming more accurate. This accounts for the fluctuations in the numbers of premises over time. Furthermore, additional categories have been added to breakdown the "surplus food supplier" to better reflect the business function.

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

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

The Authority's food and feed enforcement activity is recorded on the Authority APP system. Food annual returns and enforcement data are exported from this system to the FSA via the Local Authority Enforcement Monitoring System (LAEMS). Feed returns are submitted via a spreadsheet.

2.5 Strengths, Weaknesses, Opportunities and Threats

The Food & Health Protection Service and the Retail section of the Trading Standards Service, share an enforcement database, exchange information on food matters, carry out joint exercises to increase awareness of the role of each service, and explore joint operation opportunities to promote stronger working relationships.

Trading Standards and Food Hygiene had already begun “agile working” prior to the Covid pandemic lockdown. Agile working is a blended system of working, where officers are generally not required to attend specified fixed desks or work locations, rather the focus is on delivering the service and outputs, and being in the right place at the right time to improve efficiency (which can include an element of working from home). There is, however, an increased dependency on ICT to communicate and record work, so the Sections were at an advantage to other Neath Port Talbot services when the Covid-19 pandemic struck. Despite this, further changes to the ways of working have needed to be established, which are under constant revision as a “new normal” emerges.

Activities that will resume, albeit in a modified form, include Food enforcement workshops, shadow visits, where Food Hygiene (FH) officers will accompany Food Standards (FS) officers on interventions, and vice versa. Shadow visits are designed to foster professional development and communication on enforcement issues that are of joint interest.

In addition to the normal workload remits, further demands will be made on the services in 2021/22, including:

- Most significantly, the Covid-19 pandemic had a direct impact on delivery from the very start of the financial year 2020/21, and disrupted planned service delivery, which remains substantially outstanding, and needs to be part of a recovery plan. Various Food Hygiene (FH) officers and Trading Standards (TS) staff were redeployed to support the Covid response. For the majority of the year, approximately half of the FH team supported the Regional TTP (Test, Trace & Protect) response and the other half of the FH team supported Care Homes with infection prevention and control (IPC) advice.
- Trading Standards personnel were given duties of Covid enforcement at retail premises, and gradually also moved to support the TTP teams, during the peak of the pandemic. This has also now ended, but backlogs of work have resulted. The inspection programme has since resumed, though it is currently not possible to meet the same rate of inspection to that prior to the pandemic.
- In consideration of the extra pressures on food authorities, the Food Standards Agency (FSA) has been developing guidance and direction for recovery of priority areas for food enforcement.
- Similarly, the FSA recognises that the extra demands on authorities mean that feed inspection programmes will need to be reviewed. The lead officers for Feed are due to meet in early July to discuss the year’s enforcement programme.

- Risk assessments and safe systems of work have been developed to allow officers to carry out certain priority enforcement visits on site. Proactive work rates will not return to pre-Covid levels for some time.
- Trading Standards had volunteered to pilot the new food standards risk assessment scheme. Neath Port Talbot are the only Welsh Authority participating. The date for launch of the pilot new risk assessment scheme has yet to be confirmed, but will take place following the review of the Food Code of Practice For Wales, at the time of writing no commencement date has been set.
- Trading Standards have been tasked with delivering the commercial Japanese Knotweed treatment service with no extra resources. The officer with this duty is food qualified, consequently it will have a direct effect on food service delivery as resources are diverted from food.
- 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 continued implementation of the Trading Standards intelligence protocol.
- Further development of sharing of information between food hygiene and food standards and 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' and 'Buy With Confidence' schemes within NPT.
- The implications of the UKs exit from the European Union and the 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, food containing CBD products and the growth in the raw pet food trade.
- 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.
- Working with the NPT Buy Local scheme and other Local Authority initiatives to ensure a consistent and uniform approach to facilitate parity for the local economy and business.
- 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 the Food Standards Agency, Her Majesty's Revenue & Customs, and the Animal & Plant Health Agency.
- The revision of the Food Code of Practice (Wales) places an emphasis on competency rather than qualification of officers for certain food premises. This will have an impact on resources available.
- Maintaining and assessing competencies in line with the Food Code of Practice (Wales). The revised continuous professional development (CPD) requirements have changed from 10 hours CPD to 20 hours CPD per officer per annum.
- There is a significant risk with succession planning if/as staff leave the department. Both services are reviewing policies and resources in place to ensure continuity of the service as staff leave the department.

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 Food Law Code of Practice (Wales) and Feed Law Code of Practice (Wales). 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 (There is a charge of bespoke business advice),
- 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 current 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.

Feed inspections are governed by the Feed Law Code of Practice and the programme devised by Food Standards Agency Wales.

3.1.2 Coordinated Intervention Programme

Food safety interventions are managed via a coordinated food hygiene and food standards inspection programme. This is likely to need to be revised should the food standards risk assessment pilot be implemented.

Shadowing visits, joint projects and interventions were suspended during the Covid-19 Pandemic, but will resume in 2021-22.

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 2021/22 (as at 1st April 2021) – **Please note that due to the COVID 19 pandemic, the full number of inspections due (under the Food Law Code of Practice) will not be met, given the continued diversion of resources into the COVID response. The table below illustrates what is technically due.**

RISK CATEGORY FOR FOOD HYGIENE	(NUMBER OF PREMISES IN CATEGORY 2021/22)	NUMBER OF PREMISES CARRIED FORWARD	NUMBER OF NEW INTERVENTIONS DUE / PLANNED 2021/22	TOTAL NUMBER DUE / PLANNED 2021/22, INC BACKLOG	ESTIMATE – FOR WORK PLANNING-NUMBER DUE / PLANNED 2022/23
HIGH RISK					
A (2 interventions per year)	(3)	1	6	6	e.10
B (1 intervention per year)	(38)	22	16	38	e.50
C (1 intervention every 18 months)	(485)	284	143	427	e.350
Unrated Initially until formally inspected (prior to opening / within 28 days of opening).	---	163	---	163	---
ESTIMATE: New Businesses	---	---	---	Circa e.120 – 150	Circa e.120-150
ESTIMATE: No of premises likely to Cease Trading				Circa e.120 – 150	Circa e.120-150
LOW RISK					
D (1 intervention every 2 years)	(141)	62	72	134	e.70

E (premises should be inspected every 3 years or can be subject to an Alternative Enforcement intervention in lieu of inspection)	(557)	259	160	419	e.120
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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 2020/21, there were 409 requests for advice in relation to food premises registration and new food businesses – this was significantly up from 205 requests received in the previous year, and is quite likely due to the effect of the Covid crisis, where there was a proliferation in applications to operate a food business from home. It is estimated that with the easing of lockdown, a return to pre-Covid figures (of approx. 200 requests per annum) would be anticipated.

In addition to the planned primary inspections/interventions that are undertaken, food hygiene “revisits” are usually carried out, where Businesses are instructed to make improvement. This detailed involvement with Food Business Operators and their staff has proved to be an ideal opportunity to not only ensure improvements are made, but also to progress Best Practice standards and promote health and well-being in the wider context. It is estimated that approx. 100 revisits will be undertaken.

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, this area of work remains a priority. An all-Wales fee is set for this work. This Council fully supports the Food Hygiene Rating Scheme.

In regards to the Covid pandemic, the Food Standards Agency have undertaken to regularly provide updated guidance as to what Local Authorities would be recommended to focus resources on, acknowledging that the Covid response is a significant priority. Accordingly, the guidance covers/indicates that:

- Footfall in businesses should be minimised, at premises which continue to operate during the pandemic (essential food sales);
- Focus resources on local priorities and the Covid response;
- Defer certain planned inspections;
- Deal with Urgent Reactive work which indicates a potential serious risk to public health;
- Monitor (and surveillance of) new Food Businesses, and sign-post to relevant advice and guidance;
- Undertake remote interventions (by telephone, emails, electronic methods) to assess whether an on-site inspection is urgently needed;
- Tailor the operation of the Food Hygiene Rating Scheme during the pandemic;
- Prioritise Approval of premises, and Import/Export controls (including fish/shellfish).

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.

Dependent on risk, premises are due for an intervention within a range of 12 months to 5 years. Breaches are dealt with in line with the Authority's enforcement policy.

Following the pandemic the FSA had given direction on work LAs should be prioritising. Following the easing of lockdown, the FSA have revised this advice.

Ongoing investigative matters will need be pursued and high risk businesses and new businesses subject to inspection.

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 intervention. Though with the resources available to LAs, this may not be possible for 2021-22 and whatever resources are available will generally need to be directed to higher risk premises.

In 2021/22 Neath Port Talbot Trading Standards are set to participate in a pilot for the new food standards risk assessment scheme. This has been delayed from 2020-21 due to the pandemic and following legal advice from the Food Standards Agency that it directly contravenes the currently Food Code or Practice For Wales, which will need amendment to facilitate.

All being well, as part of the agreement to pilot the new scheme, the Trading Standards and Animal Health team (TSAH) will not be required to complete the annual food standards return to the Food Standards Agency for the years 2021-22 and 2022-23. However TSAH will need to complete a different return to gauge effectiveness of the new scheme. There is no doubt that the pandemic will affect the number of site inspections that take place.

Should the pilot not take place, then the current code of practice will continue to be implemented, but with direction and guidance from the FSA in respect of prioritising interventions. At the very least, inspections of “A” rated businesses will be carried out.

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, coordinated by Neath Port Talbot. This is likely to be set by the end of July following the FSA’s consultation with enforcement authorities across Wales.

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.

Table 2(b): Food Standards Interventions as per <i>Current</i> Food Code of Practice Risk Assessment Scheme for 2021/22						
CATEGORY	(TOTAL NO. OF PREMISES IN CATEGORY 2021/22)	NO. OF PREMISES CARRIED FORWARD (BACKLOG-DUE PRIOR TO 31/3/21).	NO. OF NEW INTERVENTIONS DUE 2021/22 (IMPLEMENTATION OF NEW RISK ASSESSMENT SCHEME)	CUMULATIVE TOTAL NUMBER PLANNED BY 31/3/2022 (INCLUDING BACKLOGS) IMPLEMENTATION OF NEW RISK ASSESSMENT SCHEME	ESTIMATED NUMBER OF REVISITS 2021/22	ESTIMATE-FOR WORKLOAD PLANNING-NUMBER DUE / PLANNED 2022/23 (DEPENDENT ON IMPLEMENTATION OF THE PILOT)
A (1 intervention a year)	33	0	TBD	TBD	TBD	TBD
B (1 intervention every 2 years)	316	192	TBD	TBD	TBD	TBD
C (1 intervention every 5 years / AES)	777	121	TBD	TBD	TBD	TBD
UNRATED	300	187	TBD	TBD	TBD	TBD
Total	1426	500			TBD	TBD

*In accordance with the Framework Agreement and frequencies set in the Food Law Code of Practice (Wales):

- 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.
- However, following the pandemic and an introduction of the Pilot, there will be a significant variation in the intervention programme.

Table 2(c):	Planned Feed Standards Interventions 2021/22 & estimated for 2022/23 Feed is co-ordinated on a regional basis, interventions are directed by the Food Standards Agency	
Premises Type	NPT planned 2021/22	NPT Estimated 2022/23 (for workload planning)
Manufacturer	2	2
Co Product Producer	3	3
Mobile Mixer	0	0
Importers	0	0
Feed Stores	4	4
Distributor	4	4
Transporter	2	2
On Farm Mixer (Annex II)	2	2
On Farm Mix	3	3
Pet Food Manufacturer	1	1
Supplier of feed materials/ Surplus Food	6	6
Sub Total "Above The Line"	(27)	(27)
Arable Farms	2	2
Livestock farms	95	95
Total due for inspection	124	124

This year's inspection obligation has yet to be determined. The authority should have confirmation of its work commitment by the end of July.

3.1.3 Resources for Inspections / Interventions

Food Hygiene

The following table contains the current staffing structure breakdown.

Table 3(a) – as at 1/4/2021 (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		0.86*		
Enforcement Officer		1.0**		
Support Officer			1.0	
Total as at 2021-04-01	7.16	1.86*	1.0	10.02**
*Note: 1.0 fte EO (F&HP) is currently seconded to Gen EH team				
** Note: Various officer have been Seconded to Covid Control roles, within the Regional TTP- (Test Trace Protect) service.	0.92 Senior EHO; 2.54 EHO's; 1.0 EO.			
<i>Historic Totals (trends):</i>				
<i>Total as at 2020-04-01</i>	7.16	1.86*	1.0	10.02
<i>Total as at 2019-04-01</i>	7.16	1.86* <i>(*Note: 1.0 fte EO (F&HP) was seconded to Gen EH team).</i>	1.0	10.02
<i>Total as at 2018-04-01</i>	6.05* <i>(*balance: 1.0 FTE seconded)</i>	2.86	1.0	9.91
<i>Total as at 2017-04-01</i>	6.84 <i>(+0.22 temporary)</i>	1.86	1.33 <i>approx. (NB- 1 officer pursuing qualification)</i>	10.03 <i>(+ 0.22 temporary = 10.25)</i>
<i>Total as at 2016-04-01</i>	6.84	1.86	1.33 approx.	10.03
<i>Total as at 2015-04-01</i>	5.2	1.0	3.9	10.1
<i>Total as at 2014-04-01</i>	5.1	1.0	3.0	9.1

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 available to work 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 approx. 18 months, which has been extended in principle to 31/3/2022.

There is the facility to redeploy Food Hygiene qualified staff to or from other parts of the service (particularly the “General EH” team) when necessary (see Chapter 4 on Resources for fuller details on the current staffing structure). However, this might cause significant pressures within any service providing the release of staff, and often risks unintended “rips and tears” with workloads, so is always managed as sensitively as possible. Temporary staff and locums/contractors have also been utilised in previous years to support the service, when additional resources have been needed.

Table 3(b) – Staffing Allocations (Apportionment estimates: Required & Allocated) – based on pre-Covid demands (for illustration purposes). Recovery phase has provided flexibility in regard to work expectations of the service).

Food Hygiene Resources			
	Estimate of Required Resources	Allocated prior to COVID 19 pandemic & subsequent Public Health response- which has required the significant diversion of these officers/resources.	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 1/4/2021 devoted to Food & Feed by Full Time Equivalent of officer						
Food Standards	DTS	DCA	DCATS Qualified or equivalent	Unqualified	TS Total	EH input
TS Team Leader	0.3	0	0	0	0.3	0
Senior TSO	0	0	0.5		0.5	0
TSO	0.5	0	0.5	0	1	0
Enforcement Officer	0	0	0.8	0	0.8	0
TS Assistant	0	0	0	0.1	0.1	0
Admin	0	0	0	0.1	0.1	0
Food Hygiene staff qualified for standards	0	0	0	0	0	TBD
Total as at 1.4.2021	0.8	0	1.8	0.2	2.8	
<i>Historic Totals (trends):</i>						
<i>Total as at 1.4.2020</i>	<i>1.3</i>	<i>0</i>	<i>0.5</i>	<i>0.2</i>	<i>2.8</i>	
<i>Total as at 1.4.2019</i>	<i>1.3</i>	<i>0.5</i>	<i>0.5</i>	<i>0.2</i>	<i>2.5</i>	

Total as at 1.4.2018	1.3	0.5	1	0.2	3	
Total as at 1.4.2017	1.2	0.4	0.4	0.2	2.2	

Feed	DTS	DCA	DCATS Qualified	(Unqualified but Competent)	Total
TS Team Leader	0.1	0	0	0	0.1
Senior TSO		0	0.2	0	0.2
TSO	0.1	0	0.1	0	0.2
Enforcement Officer	0	0.0	0	0.8	0.8
TS Assistant	0	0	0	0	0
Admin	0	0	0	0.1	0.1
Total as at 1.4.2021	0.2	0.0	0.3	0.9	1.4
<i>Historic Totals (trends):</i>					
Total as at 1.4.2020	0.2	0.0	0.1	0.6	0.9
Total as at 1.4.2019	0.2	0.0	0.1	0.6	0.9
Total as at 1.4.2018	0.2	0.0	0.0	0.6	0.8
Total as at 1.4.2017	0.2	0.0	0.0	0.6	0.8

A food standards qualified enforcement officer has been instructed to carry over certain duties from his previous post (namely treatment of Japanese Knotweed) and this will affect FTE available to deliver food standards, furthermore a Trading Standards Officer (TSO) will be absent on maternity leave for a significant period of 2021-22.

For staffing structure see Appendix C.

The proportion of time spent by each officer on the feed and food functions can be seen in the tables below.

Table 4(b):

Food Standards & Feed Resources		
Food Standards Function	Estimate of Required Resources	Allocated
Food Standards Interventions	2.1	2
Food Standards Complaints	0.3	0.2
Food Standards Home Authority / Primary Authority	0.3	0.1

Food Standards Business Advice	0.3	0.1
Food Standards Sampling / Incidents	0.2	0.1
Food Hygiene Primary Production Inspections	0.1	0.1
Liaison & Promotion	0.1	0.1
Food Safety alerts	0.2	0.1
Sub-Total	3.6	2.7
<i>Estimated additional resource required for Recovery of Backlog of Food Standards Work (short term: 2 years approx.)</i>	2.1	2.1

Feed Function	Estimate of Required Resources	Allocated
Feed Standards Interventions	2	0.8
Feed Complaints	0.2	0.05
Feed Standards Home Authority / Primary Authority	0.1	0.05
Feed Standards Business Advice, Liaison & promotion,	0.1	0.05
Feed Standards Sampling / Incidents	0.1	0.05
Food Hygiene Primary Production Inspections	0.1	0.1

Feed Safety alerts	0.1	0.1
Sub- Total	2.7	1.2

At current intervention rates, to achieve inspections targets as per the current 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 three years following the effect of the pandemic).

However these figures will need to be reassessed following the implementation of the risk assessment pilot. The FSA has recently published a recovery plan for Local Authorities to follow. Food Standards services will be expected to prioritise new businesses according to risk and “A” rated businesses, the latter of which should all have been visited by June 2022.

3.1.4 Targets and Priorities for 2021/22 (to be considered in the context of the response to the Covid pandemic)

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). The target annually is historically based on the inspection of 100% of Category A premises; and 100% of Category B premises. With respect of Category C premises, interventions can be part of a risk based strategy. However, in light of the FSA guidance for recovery of 2020/21 work affected by the Covid pandemic, the ambition is to focus on highest priorities first and move as quickly as possible to a sustained recovered, which the FSA estimate could be for the next 2 years.
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 adopted by the Authority, based on Public Health Wales recommendations.

6. To promote the improved understanding and implementation of food safety management systems (FSMS, based on “HACCP” principles) 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.
8. To maintain competency and training for all relevant staff.
9. To create paths of succession to develop junior staff within the department.

Food Standards and Feeding Stuffs

1. To implement the new food standards risk assessment scheme.
2. To develop new and safe means of delivering the food and feed service during the pandemic.
3. To assess businesses for compliance with basic legal standards via a variety of intervention tools.
4. 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.
5. To complete the annual food sampling plan.
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.
9. To create paths of succession to develop junior staff within the department.
10. To promote good practice within food & feed businesses.
11. 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

Following the Covid-19 Pandemic new risk assessments and health & safety controls have been put in place. This means interventions and inspections are undertaken differently and generally take longer.

Due to limitations of staff resources, extended periods of absence can lead to a drop in service outputs or 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 Food Hygiene Team has a number of officers on continuing secondment to the Regional TTP team. One officer has left to take on a new role within Public Health Wales.

The Trading Standards team has had little turnover of food and feed qualified personnel in the last two years.

There is a recognised shortage of qualified and competent Officers in the Environmental Health and Trading Standards professions that are able to undertake Food Hygiene and Food Standards and Feed inspections. When a member of staff does leave, it is often difficult to replace them due to the restricted availability of suitably qualified and competent officers.

Recruitment options and processes are being pursued, however there is anticipated to be a shortfall.

During the year two further full time officers are expected to be on maternity leave.

Both teams have a wide remit, but food safety and feed standards work is a high priority. Nevertheless, other priorities can take precedence and resources need to be diverted. 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 system of Food Hygiene officers undertaking limited Food Standards work to help meet demand has been suspended until after completion of the risk assessment pilot.

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)
- British Standards Institute (BSi) (Trading Standards & Animal Health)
- Coordinating groups and panels specialising in food and feed enforcement
- Public analyst (s) (monthly meetings between TSAH and Minton Treharne & Davies Public Analyst services)
- Email & Internet (including social media accounts)
- 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 chairs the Glamorgan regional coordinating group for food standards, which is comprised of the 7 authorities formerly making up the old county of Glamorgan, plus representatives from two Public Analyst Laboratories.

Trading Standards participates in surveys and exercises held under the auspices of the Glamorgan Group, Trading Standards Wales (TSW) and the Food Standards Agency.

Trading Standards is an active member of Trading Standards Wales. Information received feeds into the tactical and strategic assessments carried out by TSW which helps focus resources and identifies emerging threats in the county.

Neath Port Talbot Trading Standards represent Neath Port Talbot & Swansea's interests in regional feed enforcement. Regular communication takes place between the two authorities on feed issues and delivery of feed enforcement across the Neath Port Talbot / Swansea region.

The Food Hygiene and Health Protection team 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.

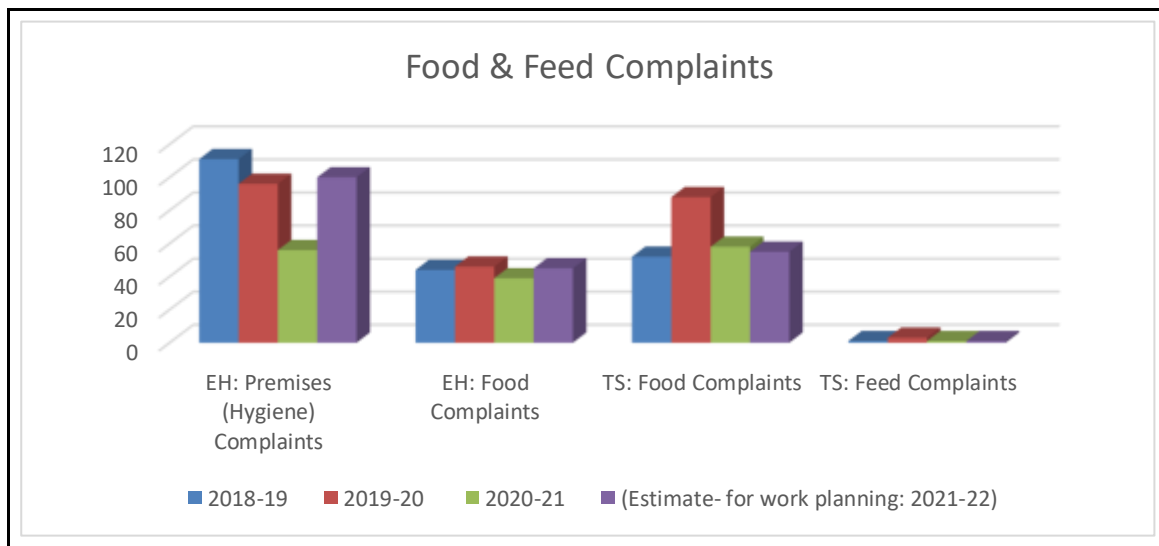
The Food Hygiene team provides representation for the Wales Food Safety Expert Panel, and the Wales Food Hygiene Rating Scheme Steering Group.

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): Food and Feed Complaints / Service Requests (by Year)



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 the 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 had made a commitment to expand its number of partnerships. However, the pandemic has delayed this and a new approach is being developed.

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). Enforcing authorities are legally obliged to consult with the Primary Authority of the business under investigation.

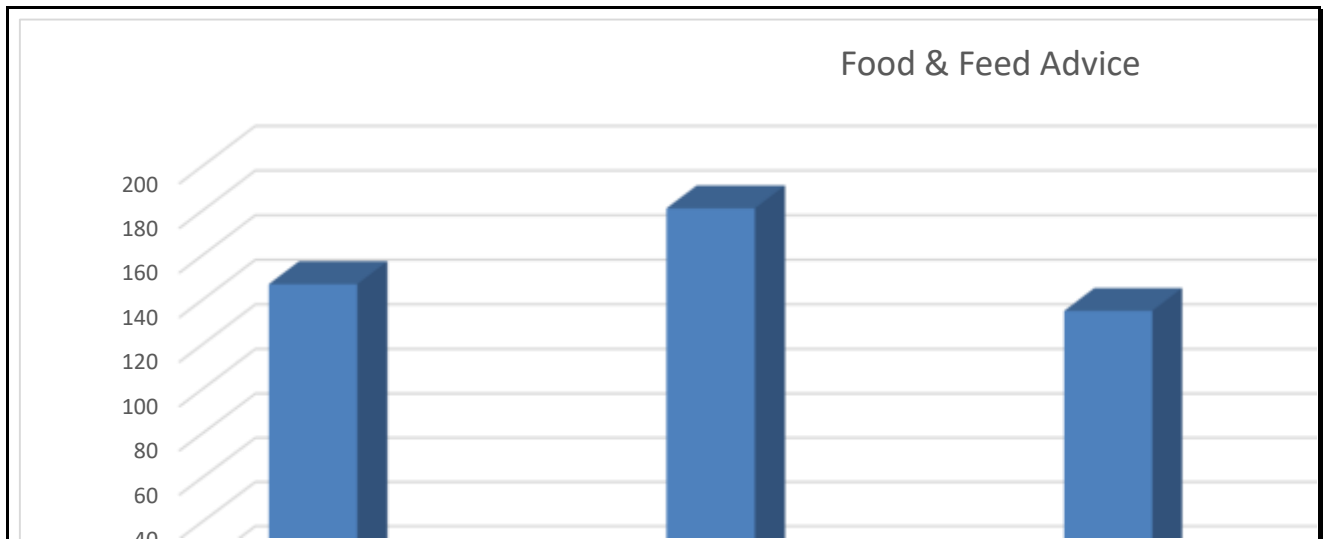
Although there is no legal obligation where a breach is detected involving a company based in another part of the UK without a Primary Authority Partner, liaison is instigated with the relevant local authority / authorities under the Home Authority principle.

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

The EH&TS department charges for the provision of “bespoke” 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. The level of income from this policy is not significant.

Table 5(b): Food and Feed Advice



3.5 Food and Feed Sampling

Food sampling trends, intelligence and Food Standards Agency priorities are examined, analysed and used to inform 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 including:

- Welsh Food Microbiological Forum targeted surveys;
- The All Wales ‘Shopping Basket’ Food Sampling Survey;
- Trading Standards Wales Surveys;
- Glamorgan Trading Standards Group Surveys;
- Public analyst co-ordinated surveys;
- Food Standards Agency led surveys; and
- Food Standards Agency Funded surveys.

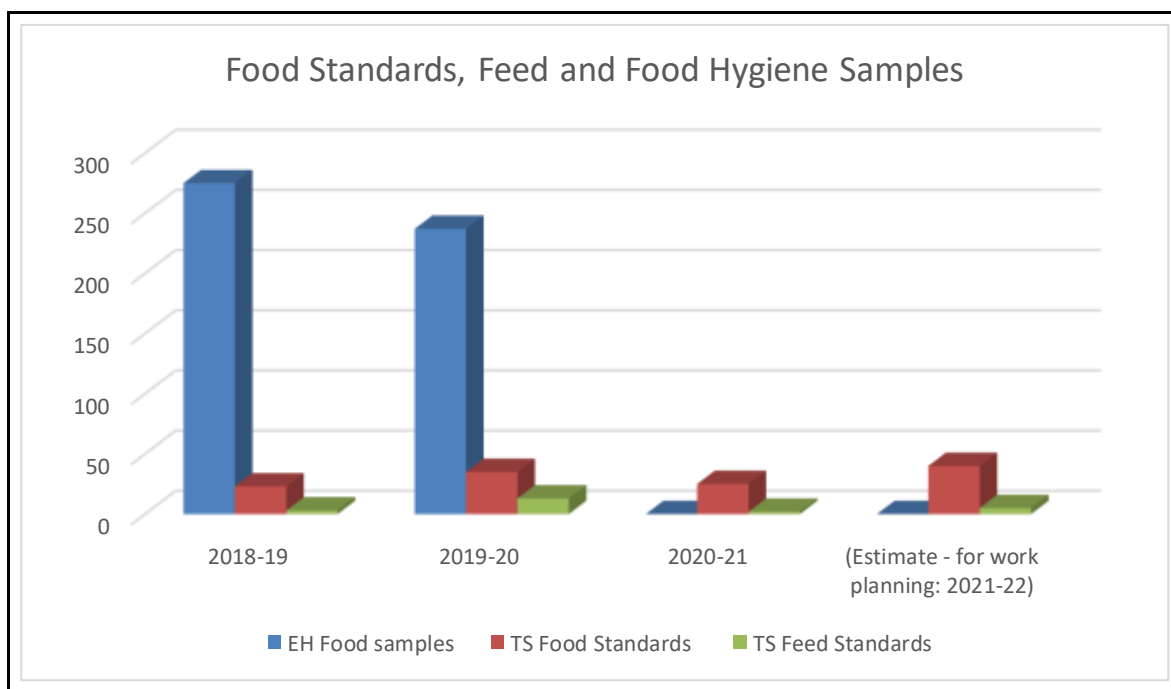
The Food Standards Agency sets and funds the regional (Welsh) feed sampling programme.

After the sampling programme was significantly curtailed last year, Trading Standards hopes to resume a complete sampling programme in 2021-22. Both the Neath Port Talbot and Glamorgan Group sampling programmes have been set and have begun.

The service aims to target problem areas such as allergens, colour additives and descriptions at takeaway outlets and to carry out sampling of manufacturers and wholesalers and imported food (following EU Exit) where it is found as part of the intervention programme.

It is anticipated that feed samples will focus on any imported feed, following the EU exit, and raw pet food which has been identified as a problem area.

Table 5(c): Numbers of Official Control Samples (by Year)



Resource Allocation:

Approximately 3 days a month are usually spent by one officer (usually a Support Officer) sampling foods for microbiological analysis and undertaking the subsequent administration. However, in light of the Pandemic, we do not envisage taking many samples, unless urgently required on public health grounds, all proactive/routine surveillance sampling will likely remain suspended.

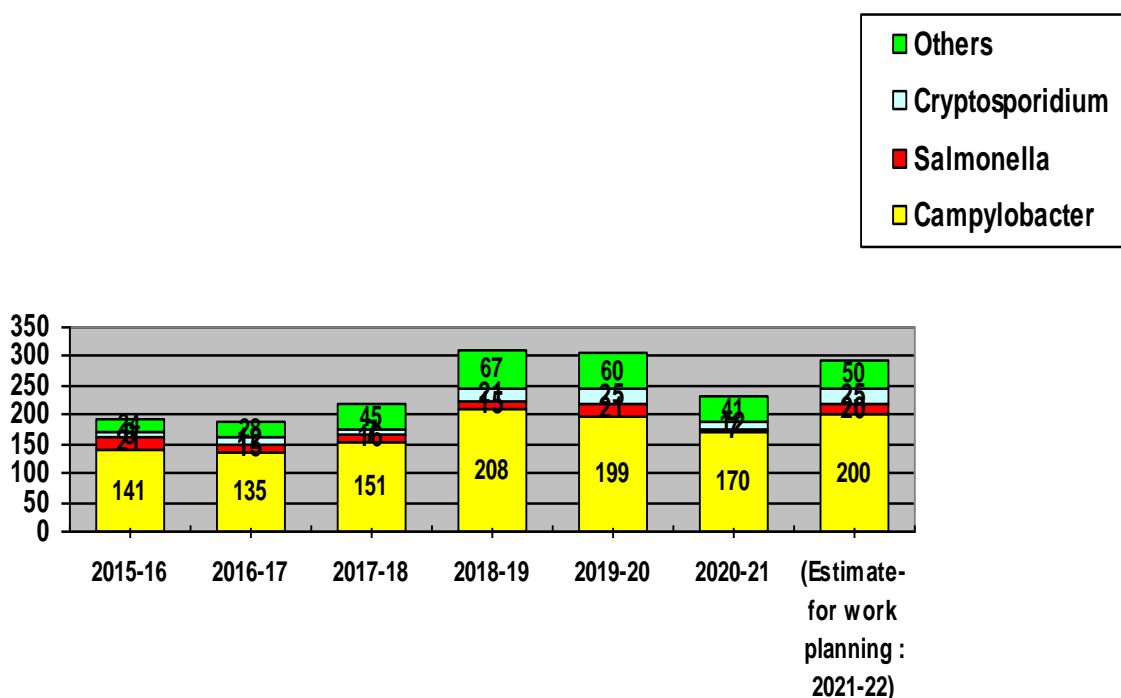
Most food standards samples are taken by qualified and competent officers. However, Trading Standards utilise the TS assistant for informal sampling surveys, with follow up action being taken by suitably qualified and authorised officers.

Samples taken are submitted to either the local Microbiology testing laboratory (PHW-Carmarthen) 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 (issued by the 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 (owing to their medical and public health significance), with other work being re-scheduled.

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

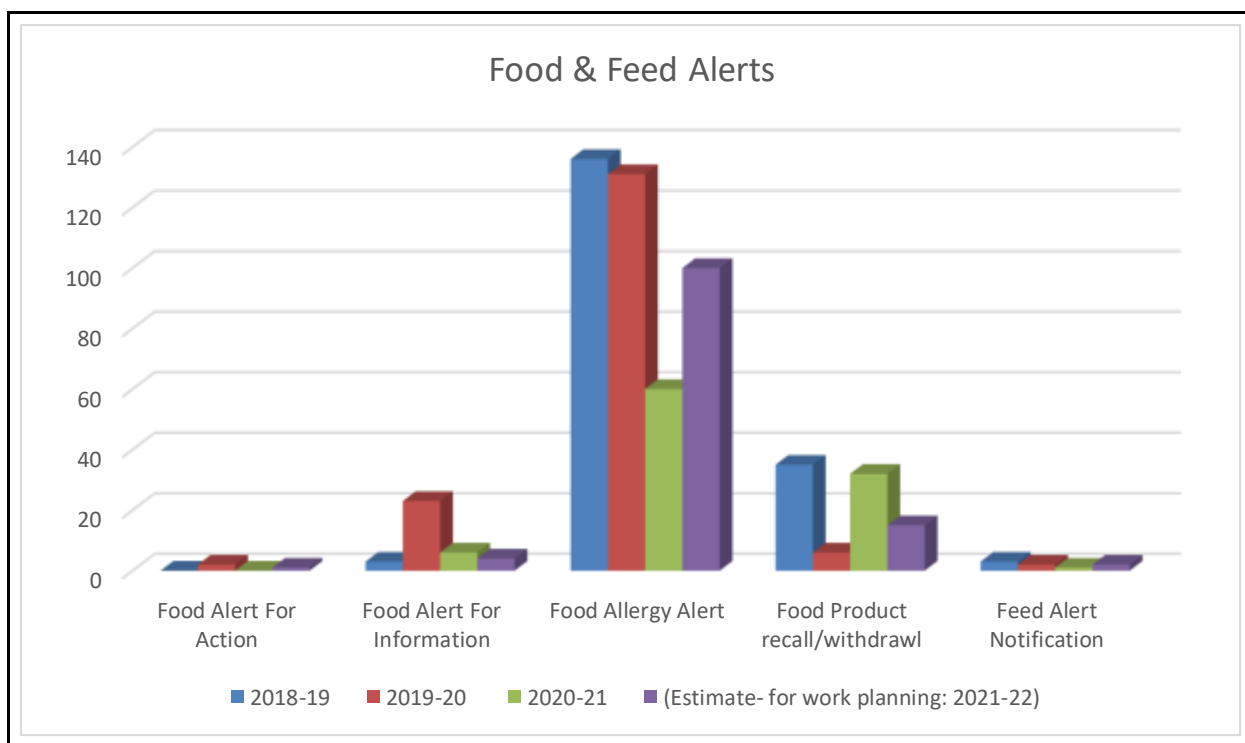
3.7 Food & Feed Safety Incidents

In line with the current Code of Practice the services have documented procedures which outline the action to be taken following the receipt of a food or feed alert. Activity is recorded on the Flare/APP database.

Alerts are received by a direct email from the Food Standards Agency Wales (FSA-W) to enforcement officers. Though fairly uncommon, 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 means resources from other work needs to be redirected to respond to the FAFA. Food Alerts for Information or Food Allergy Alerts are more common and most food alert warnings received require only a small officer resource mainly to re-publicise risks locally, via the Services social media accounts. When necessary, directly affected businesses are contacted and advised to effect a withdrawal.

When breaches are detected in Neath Port Talbot, the Services will immediately contact the Food Standards Agency Wales via the applicable food/feed incident report form and established mechanisms, and the Services will liaise with other partners as appropriate.

Table 5(e): Food & Feed Alerts



The TSAH service receives a significant number of allergy alerts, most of these are promoted locally, through Social Media or other methods, with only a few requiring significant action. Existing internal resources are currently sufficient to deal with the estimated number of food / feed alerts incidents.

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	
Trading Standards & Animal Health		
Glamorgan Food Group (Chair)	4 days per year	1 Officer
NPT/Swansea Feed Region	4 days per year	1 Officer
Glamorgan Group	4 days per year	1 Officer
TSW Animal Health and Welfare Panel	4 days per year	1 Officer
TSW Group	6 days per year	1 Officer
Neath Port Talbot / Swansea Feed delivery	7 days per year	2 officers
Welsh Primary Authority User Group	2 days per year	1 officer
TSW Lead Officer for Training	4 days	1 officer
Food Hygiene & Health Protection		
WWhoEHG Food Safety (Task Group & Expert Panel)	4 days per year	1 Officer
WWhoEHG Communicable Disease (Task Group & Expert Panel)	4 days per year	1 Officer
WWhoEHG: Environmental Health Group	4 days per year	1 Officer
WWhoEHG: Food Hygiene Rating Scheme Steering Group	4 days per year	1 Officer
Welsh Food Microbiological Forum	3 days per year	1 Officer
Meetings with CCDC (Consultant in Communicable Diseases, of Public Health Wales)	Estimate 2 days per year	1 Officer
Joint		
Consultee to Building Control & Planning Department & Licensing Department.	Estimate 2 consultations per week	1 Officer
Regulatory Delivery	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: TSW = Trading Standards Wales WWhoEHG = Welsh Heads of Environmental Health Group CCDC = Consultant in Communicable Diseases		

3.9 Promotion & Intelligence

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

Food & Feed Promotion		
Method	Trading Standards & Animal Health	Food Hygiene & Health Protection
Attendance at consumer education events.	X	
Primary Authority Scheme	X	
Active promotion of national food Safety events	X	X
Liaison with NPTCBC food delivery services	X	X
Buy with confidence	X	
Facilitating hand washing demonstrations in educational establishments and voluntary groups when requested.		X
Targeted advice to consumer groups, FBOs and FeBOs.	X	X
Targeted seminars and training sessions to FBOs & FeBOs	X	X

The Authority continues to promote food safety, food standards and feed hygiene/standards in all areas of its work. Most inspections are carried out pro-actively and officers promote “best practice” by encouraging businesses to implement systems that achieve compliance with relevant legislation. Prospective business owners are encouraged to seek the advice of the department before the food or feed business begins operations to prevent possible contraventions from occurring, however there is a charging system for the provision of bespoke advice.

The Food Hygiene team has an integrated role of health promotion, particularly for businesses they have contact with. 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		
Method	Trading Standards & Animal Health	Food Hygiene & Health Protection
Knowledge Hub (reference and discussion site).	X	X
IDB (The Trading Standards Intelligence Database).	X	
RIAMS (as provided by the Food Standards Agency).	X	X
National Anti-Fraud Network (NAFN).	X	
Trading Standards Regional Intelligence Analyst and Local Intelligence Officer network.	X	
FSSiNet – Food Sampling Surveillance System.	X	
TARIAN.		X
Civica / APP (FLARE): Local authority enforcement database.	X	X
Coordinating groups and panels specialising in food and feed enforcement.	X	X

4.0 RESOURCES

4.1 Financial Allocation

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

Table 7 – Budget figures	
Revenue Budget	2021 -22
Expenditure	£
Staffing- Food Hygiene	418,578
Staffing- Infectious Disease	46,509
Staffing- Food Standards	115,586
Staffing- Animal Feeding Stuffs	61,921
Transport (TS)	2,040
Transport (EH)	6,907
Equipment (EH)	2,931
Legal Fees – (TS)	0
Sampling & Analysis – Food Hygiene	1,483
Sampling and Analysis – Trading Standards – Food & Feed only	13,000
Total Expenditure	668,955
Income	
Government Grant	0
Other Income	TBC
Feed funding (estimate)	£10,000 TBC -
Total Income	TBC
Estimated Net Expenditure	678,955

4.2 Professional Development

The services are committed to staff professional development. The two services maintain separate training plans. The training and development budget for 2021/22 for the whole of the EH&TS service is initially set at approximately £8,580.

Trading Standards & Animal Health

All food standards & feed enforcement staff participate in one-to-one supervisory review with their supervisor or team leader approximately every 10-12 weeks and receive an annual appraisal.

During the pandemic Trading Standards food and feed staff have held meetings every other week day to maintain communication and to share investigation experiences.

Bi monthly meetings have recently resumed within Trading Standards and topic specific briefing sessions will resume once new working patterns have been confirmed.

Weekly briefing notes are circulated to summarise legislative and service developments, news and training opportunities.

Training is arranged locally and regionally. Training is delivered by the Food Standards Agency, trainers commissioned by Neath Port Talbot TS or by Trading Standards Wales (TSW). Distance learning and online courses have been the norm during the pandemic, although they are not a substitute for class room learning, they have at least enabled officers to maintain Continuing Professional Development (CPD). The TSW and CTSI Lead officer for training is based within NPT Trading Standards and the officer circulates a monthly collation of online training opportunities of which they have become aware.

Training needs and CPD in Food & Feed Standards is monitored via reviews and appraisals by the Senior Trading Standards Officer and the Trading Standards Team Leader. Food CPD expectations run on a calendar year basis and feed CPD runs over the financial year.

Despite working remotely, online discussion groups via Microsoft teams also encourage officers to consult with their colleagues, to discuss investigations and share information.

Food Hygiene & Health Protection

All food hygiene staff participate in one-to-one supervisory reviews with their supervisor or team leader approximately every 6-9 weeks and receive an annual appraisal.

Regular Food Hygiene Team meetings are held to discuss ongoing food and communicable disease issues, including work planning and outputs, and complex cases.

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 self-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.

4.3 Legal Expenditure

Legal fees and costs for taking action in connection with feed, 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. Theoretically, financial support should also be available from the Food Standards Agency, for either Trading Standards or Food Hygiene teams who face taking legal action in cases which have significance of the food sector.

Receipts from the incentivisation scheme under the Proceeds 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.

Most significantly, the Trading Standards Service is currently in litigation with a feed producer which is causing a significant drain on resources. The Food Standards Agency has yet to commit to support.

5.0 QUALITY ASSESSMENT

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.

5.1 Management Monitoring

Under the pandemic, monitoring has been restricted. However following resumption of regular enforcement duties evaluation methods and records include:

- Monitoring of performance measures 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 are held approx. every 6-9 weeks (FH) or 12 weeks (TS) plus an annual appraisal, which includes a competency assessment for food and feed enforcement as appropriate.
- Accompanied visits and Peer assessments, following internal protocols. It is difficult to carry these out under pandemic conditions, but paperwork checks and interviews with officers offer a reasonable alternative as a means of assessing officers.

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.

A feed audit was planned for March 2020, but was postponed. There is no information on a new date at the time of writing, although the Authority can expect an audit in the near future.

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 to the Corporate monitoring of performance, 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 2020/21 included:

- Staff were able to work successfully from home during the whole of the lockdown periods, building on earlier trials of Agile working, although the work undertaken quickly became focussed on the Covid response.
- Officers provided an invaluable service in supporting Care Homes within NPT to understand the Covid Control guidance issued by Public Health Wales. Care Homes were provided with a Communicable Disease control advice service to ensure plans were in place for daily health monitoring for staff and residents, and for plans to contain or segregate outbreaks.
- Staff were identified at an early stage to spearhead the Regional TTP (Test Trace Protect) service, and took on responsibilities for managing Community outbreaks of Covid-19, and have continued to have their roles expanded, as a result of their professionalism and effectiveness.
- Staff were responsible for taking the lead in managing outbreaks of Covid in Care Homes, liaising with Health professionals from Public Health Wales, Local Health Board, Social Services Commissioning teams, as well as with the Management teams with the Care Homes affected, many of whom were under immense pressure and distress.
- When resources permitted (phase 1), officers were involved in advising businesses and taking queries from the public regarding the implementation of Coronavirus Restriction Regulations.
- A small contingent of staff resource was retained for essential food safety work, including the Approval of premises, advice to New Businesses, and for dealing with complaints of public health significance.
- Locum EH staff were in scarce supply, owing to an unprecedented National demand, but when they were available for contracts, they were actively recruited and engaged-either to undertake a moderate number of inspections at higher risk premises, or otherwise incorporated into the Regional TTP team.

6.1.2 Food Standards and Feeding stuffs

Trading Standards enforcement was affected considerably during the pandemic.

Trading Standards staff were redeployed into the TTP teams and for a significant period also had Covid enforcement duties before extra staff were engaged by Environmental Health for this purpose.

Despite this, Trading Standards did manage to achieve the following:

- Took over the chair of the Glamorgan Food Sampling Group and confirmed a sampling programme following easing of lockdown.
- Continued to highlight the problem of microbiological contamination of raw pet food at a national level and continued to fight an appeal against an improvement notice issued against a raw pet food plant, working with FSA and the Animal Plant Health Agency in formulating a response to the ongoing problem with the subject area.
- Successfully applied for funding to carry out sampling exercises at takeaways for allergens and description breaches.
- Successfully delivering Covid enforcement duties at the height of the pandemic and supporting the TTP service.
- Developing and employing new systems to strengthen agile working.
- Maintained CPD for food and feed officers.
- Increased online monitoring of supply of food and feed via social media.
- Pivoted to online surveillance and monitoring whilst on lockdown and developed new methods of working and surveillance of businesses.
- Began developing a new method for paying for samples taken for analysis.
- Took the opportunity to make links with other services in the authority such as Economic development to share information on businesses.
- Assisted in the development in an Internet based NPT portal for business support and advice.

6.2 Identification of Variation from the Plan

Variations from the Service Plan will be identified annually along with reasons for the variance and whether or not they are justified.

Trading Standards has a large backlog of inspectable businesses for Food Standards purposes, this has only grown over the lockdown. Proactive inspections will continue to be subject to the same competition for resources as other work, and will be prioritised as necessary. The sampling plan was almost completely abandoned. Some “A” rated visits were inspected, as were some new businesses that were considered higher risk.

With regard to food hygiene interventions at lower risk rated premises, the previous backlog had been addressed, but will have reformed during the pandemic. 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

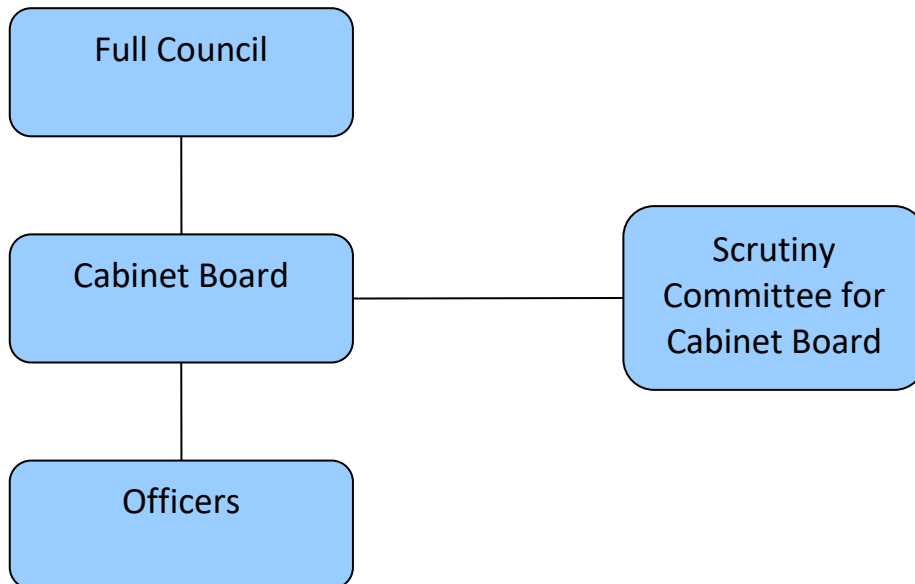
Over the past 5 years, the changes to food & feed safety legislation and the challenges faced by food & feed safety enforcement authorities have been significant. Both services are governed by the priorities set by the Food Standards Agency and the Food & Feed law codes of practice.

Additionally Trading Standards are also influenced by Office of Product Safety & Standards and National Trading Standards (NTS). Whereas the Food Hygiene service has to have regard to the enduring 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 2021/22 and beyond include:

Areas for Improvement		
Improvement	Trading Standards & Animal Health	Food Hygiene & Health Protection
Reviewing out of hours provision and cover arrangements in relation to outbreaks of communicable disease and food / feed alerts.	X	X
Developing a training programme for officers involved in the investigation of outbreaks of communicable disease.		X
Undertaking suitable promotional activities / campaigns.	X	X
Consult with stakeholders and establish measures to assess the quality of the service provided.	X	X
Increasing intelligence-led enforcement of food standards and feed; and implementation of the new risk assessment scheme for food standards.	X	
Continue to develop resources for the agile working scheme including methods of data gathering and recording and to successfully seek support from NPT IT.	X	X
Continuing to improve the use of alternative enforcement strategies in relation to food and feed inspections.	X	
The challenges regarding local government financing and organisation particularly following the pandemic.	X	X
Assessing and addressing the demands on the service following EU Exit.	X	X
Addressing the demands on the service from the Food Standards Agency "Regulating Our Future" programme.	X	X

APPENDIX A

Decision Making Structure:



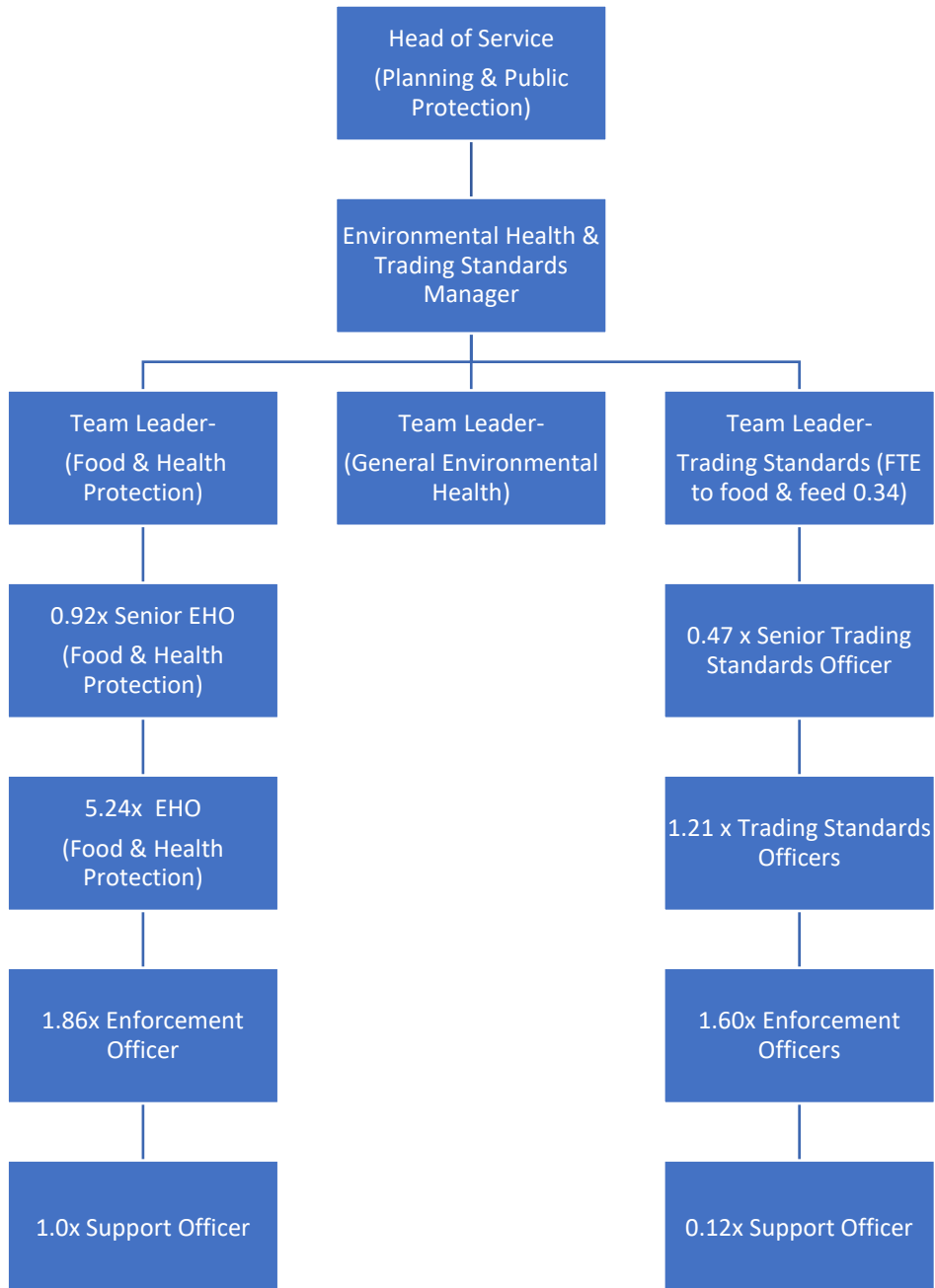
APPENDIX B

Department Structure:



APPENDIX C

Service Structure (as at 1/4/2021):



APPENDIX D

Number of Registered Food Premises by Ward (2020 & 2021)

WARDS : NEATH	(WARD CODES)	2020	2021	WARDS: PORT TALBOT	(WARD CODES)	2020	2021
Aberdulais	ABD	15	15	Aberavon	ABV	76	77
Alltwen	ALL	16	16	Baglan	BAG	40	41
Blaengwrach	BLA	17	17	Briton Ferry East	BFE	44	45
Bryncoch North	BRN	19	19	Briton Ferry West	BFW	15	15
Bryncoch South	BRS	37	37	Bryn and Cwmavon	BRY	61	62
Cadoxton	CAD	12	12	Coedffranc Central	COC	46	45
Cimla	CIM	19	19	Coedffranc North	CON	15	15
Crynant	CRY	13	13	Coedffranc West	COW	44	45
Cwmllynfell	CWM	12	12	Cymmer	CYM	31	32
Dyffryn	DYF	20	20	Glyncorrwg	GLC	7	7
Gwaun-Cae-Gurwen	GCG	28	29	Gwynfi	GWY	12	12
Glynneath	GLN	34	33	Margam	MAR	47	48
Godre'r Graig	GOD	6	6	Port Talbot	POR	79	78
Lower Brynamman	LBR	11	11	Sandfields East	SAE	49	50
Neath (East)	NEE	43	43	Sandfields West	SAW	40	41
Neath (North)	NEN	139	140	Taibach	TAI	42	41
Neath (South)	NES	19	20	Port Talbot area Total		648	654
Onllwyn	ONL	9	9				
Pelenna	PEL	10	10	Other / Out of area	xxx	0	0
Pontardawe	PON	95	93	NPT Combined Total		1340	1346
Resolven	RES	25	25				
Rhos	RHO	19	19				
Seven Sisters	SEV	19	19				
Tonna	TON	15	15				
Trebanos	TRE	11	11				
Ystalyfera	YST	29	29				
Neath area Total		692	692				