

Shared Regulatory Services

Food and Feed Law

Service Plan 2018/19



Food Hygiene
and Standards



Shared
Regulatory
Services

Cyngor Bwrdeistref Sirol



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Introduction

Shared Regulatory Services (SRS) is a collaborative service formed between Bridgend, Cardiff and the Vale of Glamorgan Councils on 1st May 2015. The new Service delivers a fully integrated service under a single management structure for Trading Standards, Environmental Health and Licensing functions with shared governance arrangements ensuring full elected member involvement.

Local authorities have a duty to enforce the Food Safety Act 1990, the Official Food and Feed Controls (Wales) Regulations 2009 and a vast array of food and feed legislation including the Food Hygiene (Wales) Regulations 2006 and as part of the Food Standards Agency's Framework Agreement are required to produce a Food and Feed Service Plan setting out the arrangements it has in place to discharge this duty. This Food and Feed Law Enforcement Service Plan, is produced in response to that requirement and is designed to inform residents, the business community and the wider audience, of the arrangements Bridgend, Cardiff and the Vale of Glamorgan has in place to regulate food and feed safety. It also shows how these activities contribute to and support others in delivering corporate objectives to the community as a whole.

The Service Plan details how the Food and Feed Service will fulfil the major purpose of ensuring the safety and quality of the food chain to minimise risk to human and animal health. To achieve this, officers from the Shared Regulatory Service will provide advice, education and guidance on what the law requires, conduct a programme of interventions, investigations, sampling and take enforcement action where appropriate. This Plan is therefore designed to both meet the requirements laid down by the Food Standards Agency and to clearly show how through encouragement, regulation and enforcement, food safety will be delivered across the region and identifies the resources available to do this.

Christina Hill
Operational Manager Commercial Services

1. Service Aims and Objectives

1.1 Aims and objectives

The Food and Feed Safety Service is committed to improving the safety and quality of the food chain and to demonstrate this, the Service has adopted the following aims and objectives.

The overall aim of the Service is to:-

Protect public health by ensuring that food for human or animal consumption is without risk to the health and safety of consumers, and is labelled and described accurately.

To achieve this, the service has adopted the following 12 key delivery priorities:-

- Meet the 'The Standard' outlined in the Framework Agreement on Local Authority Food Law for enforcement of food hygiene, food standards and/or feed legislation.
- Ensure that all food and feed premises receive an intervention in accordance with relevant statutory codes of practice.
- Investigate food and feed complaints.
- Develop Primary Authority partnerships with businesses and respond to enquiries from other enforcing authorities.
- Provide advice to consumers and business on food and feed matters and respond to all enquiries for service within specified target times.
- Maintain an adequate food and feed inspection and sampling programme.
- Ensure that food and feed imported into the European Union through the Port of Cardiff, Barry and Cardiff International Airport meet legal requirements and are subject to checks.
- Control and investigate sporadic and outbreak cases of food poisoning and food related infectious disease.
- Investigate, initiate and respond to food alerts and incidents.
- Work with other food and feed authorities and professional bodies to ensure consistency of food and feed safety enforcement.
- Promote food and feed safety and standards.
- Take appropriate enforcement action proportionate to the degree of risk to public health and in accordance with the Food Hygiene Rating Scheme.

1.2 Links to Corporate Objectives and Strategic Plans

As a regional organisation providing regulatory services across three local authority areas, we place the **corporate priorities** and outcomes of the three councils at the heart of all that we do (Appendix E). In developing our own strategic priorities and outcomes for Shared Regulatory Services, we have considered the priorities of all the three authorities, together with the needs and aspirations of our partners and customers so they translate into priorities that meet local needs.

Our priorities



Our outcomes



The following strategic priorities are particularly relevant to the delivery of the food and feed controls:-

Improving health and wellbeing – Amongst other factors impacting on health, the quality of the food we eat, the standards to which it is produced and the environment in which it is prepared, are central to people’s health.

Food hygiene and food standards enforcement strives to ensure that food and drink is accurately described and labelled, meets the required food standards and is prepared in a safe environment. Food hygiene controls and inspections seek to minimise the risk to consumers of food borne infection.

Safeguarding the Vulnerable – The role of the food service plays a vital part in safeguarding the vulnerable, particularly in relation to educational and care homes settings. Good nutrition and safe food are essential to everyone’s short and long term health and wellbeing which is further enhanced in terms of vulnerable adults and children. The enforcement of food regulations ensures that food provided in these settings are safe, therefore protecting our vulnerable residents.

Supporting the local economy – The provision of timely advice and guidance on food safety and food standards legislation can benefit the economic viability of businesses. Failure of a food producer to correctly label foods can, for example lead to costly re-labelling of inaccurately described foods and it is essential for producers to be fully acquainted with the legislation that applies to their products and the hygiene standards they need to comply with when producing the food. The equitable enforcement of regulations helps to maintain a level playing field, allowing businesses to compete on equal terms.

Nationally the service also contributes to the **National Enforcement Priorities for Wales** for local regulatory delivery which highlight the positive contribution that regulatory services, together with local and national partners, can make in delivering better outcomes:-

- Protecting individuals from harm and promoting health improvement
- Ensuring the safety and quality of the food chain to minimise risk to human and animal health
- Promoting a fair and just environment for citizens and business
- Improving the local environment to positively influence quality of life and promote sustainability.

The Local Public Health Plan 2016/17-2018/19

Published as part of the Local Public Health Strategic Framework the Local Public Health Plan provides details of how local Public Health teams work in partnership to improve and protect the health and well-being of the local population. The Plan sets out several priority work areas and actions necessary to achieve improvement. Priority areas include:-

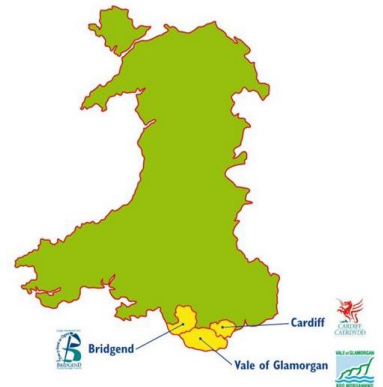
- Tobacco
- Obesity
- Sexual health
- Health at work
- Immunisation
- Alcohol
- Falls prevention
- **Health protection**
- Healthcare public health

The Food and Feed Service contribute to the Health Protection priority by working towards a reduction in the incidence and impact of infectious disease and environmental hazards. The relevant section of the Plan can be found in Appendix B.

2. Background

2.1 Area profile

Shared Regulatory Services covers the Council areas of Bridgend, Cardiff and the Vale of Glamorgan and serves over 600,000 residents. Extending from St Mellons in the east to Maesteg in the west, the area encompasses Cardiff, the capital City of Wales with its array of cultural, financial and commercial organisations and the rural areas of Bridgend and the Vale of Glamorgan with their vibrant tourist and agricultural economies.



Bridgend is situated on the south coast straddling the M4 corridor. It comprises an area of 28,500 hectares and a population of just over



140,000 residents. To the north of the M4, the area consists of mainly ex-coal mining valley communities with Maesteg as the main centre of population. To the south of the M4, the ex-market town of Bridgend is the largest town, the hub of the economy and its employment base. To the south west on the coast lies Porthcawl, a traditional seaside resort, with a high proportion of elderly residents, which is subject to a major influx of tourists during the summer period.

Cardiff is the capital city of Wales and is continuing to grow faster than any other capital city in Europe. In

population terms, it is the largest city in Wales with a population of 360,000. Measures of population however, belies Cardiff's significance as a regional trading and business centre. The population swells by approximately 70,000 daily with commuters and visitors. Cardiff is the seat of government and the commercial, financial and administrative centre of Wales. Cardiff boasts one of the most vibrant city centres in the UK and on a typical weekend, Cardiff's night time economy can attract over 40,000 people and sometimes more than 100,000 when the Principality Stadium hosts international events.



The Vale of Glamorgan is bounded to the north by the M4 motorway and to the south by the Severn Estuary. It covers 33,097 hectares with 53 kilometres of coastline, and a population of over



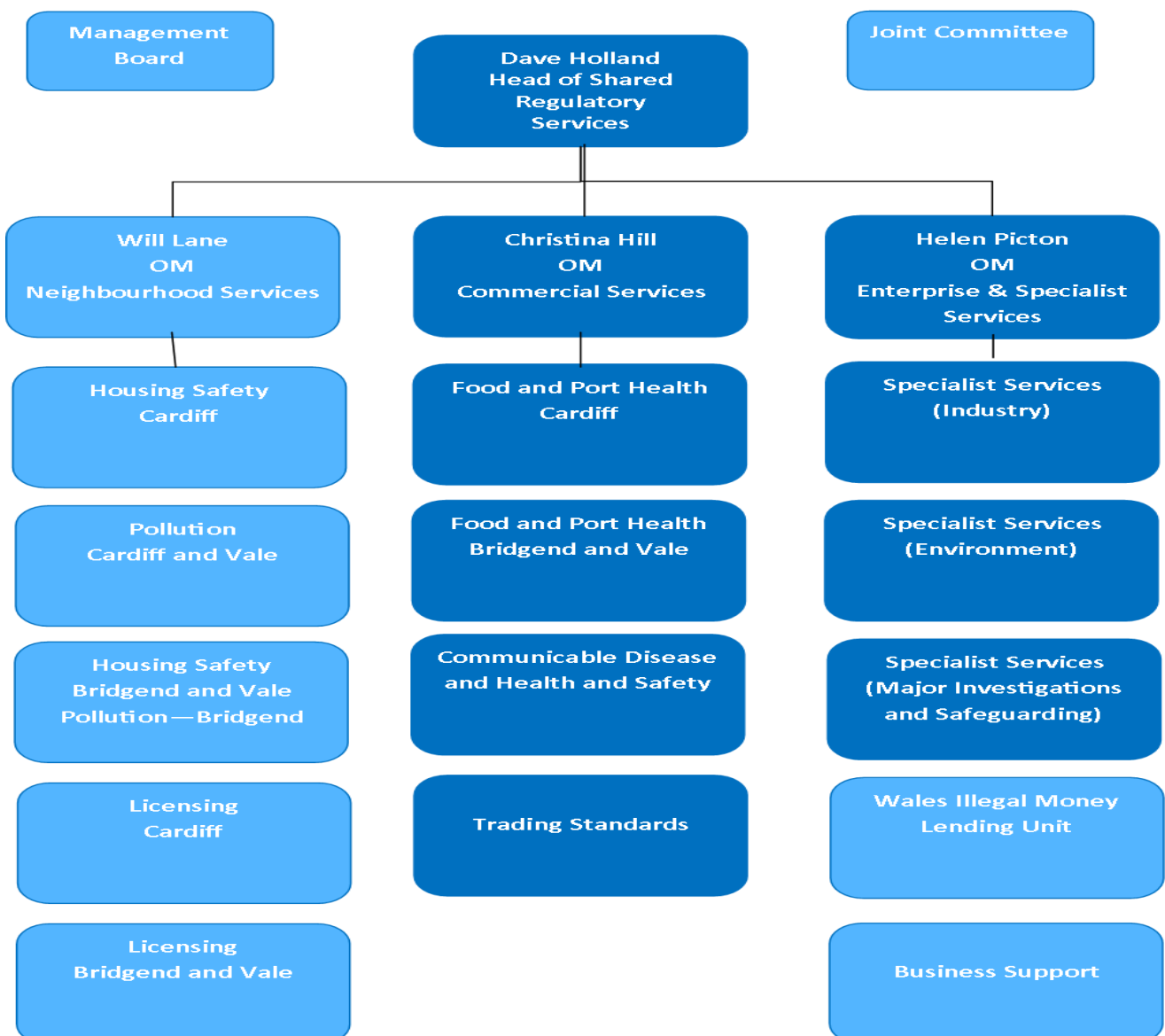
130,000 residents. The area is predominantly rural in character, but contains several urban areas of note such as Barry, Penarth, Dinas Powys and the historic towns of Cowbridge and Llantwit Major. Barry is the largest town, a key employment area and popular seaside resort. The rural parts of the Vale provide a strong agricultural base together with a quality environment, which is a key part of the area's attraction. The area includes Barry Docks and Cardiff International Airport.

2.2 Organisational structure

Food and Feed Services are provided by the Commercial Services and Enterprise and Specialist Services Teams within Shared Regulatory Services. The Teams consist largely of Environmental Health and Trading Standards Officers delivering services across the three areas. The Vale of Glamorgan Council act as the host authority for the Service with functions associated with this Plan delegated to the Shared Service Joint Committee.

Commercial Services deal with food safety, port health, health improvement and communicable disease, feed safety, food standards, food labelling in retail premises, whilst Enterprise and Specialist Services deal with these activities in non-retail premises together with feed safety and feed standards and where they arise, major investigations. Operational functions within the Service are illustrated in the following table with those that have responsibility for food and feed matters are highlighted in darker blue.

Shared Regulatory Services Organisational Chart



2.3 Scope of the Food and Feed Service

The Food and Feed Service of Shared Regulatory Services is responsible for providing a comprehensive food and feed service combining education, advice and enforcement. The scope of the Food and Feed Service includes:-

- Undertaking of food hygiene, food standards, feed and agricultural inspections;
- Investigating complaints;
- Implementing the Food Sampling programme;
- Implementing the FSA Feed Sampling Programme;
- Provision of education, training and advice on food and feed issues;
- Investigating cases of communicable disease including food poisoning;
- Responding to Food Standards Agency alerts as appropriate;
- Implementing the National Food Hygiene Rating Scheme;
- Port health;
- Approval of product specific establishments and feed businesses.

Responsibility

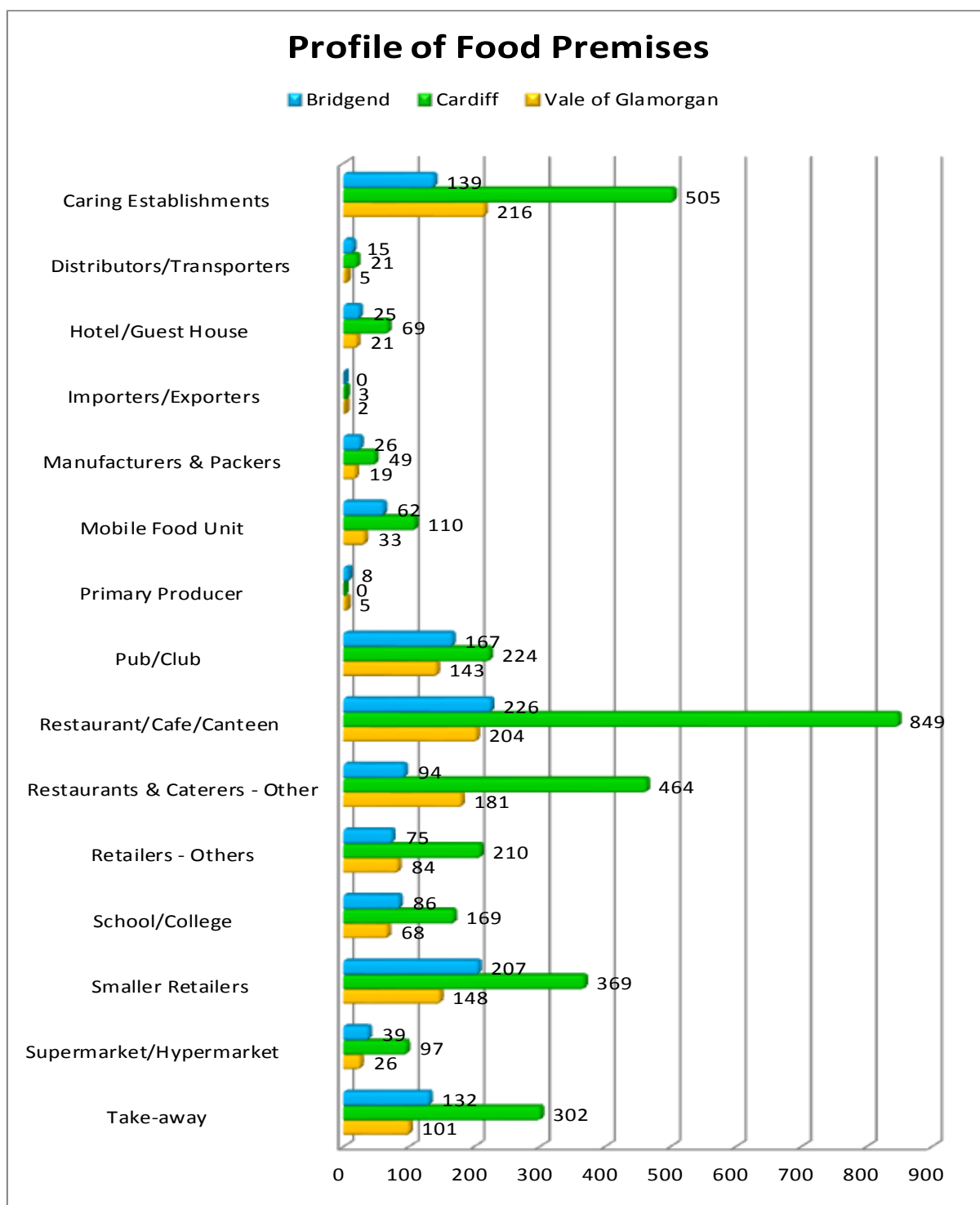
Responsibility for food safety activities is broken down as follows:-

Team	Responsibility
Food and Port Health Teams (Commercial Services)	Food Safety Intervention programme in retail and catering businesses
	Complaints and requests for service for retail and catering businesses
	Food sampling at retail and catering businesses
	Food Safety alerts and incidents
	National Food Hygiene Rating Scheme
	Port Health
	Imported food control
Trading Standards (Commercial Services)	Feed safety and standards at commercial premises
	Food Standards inspection programme in retail premises
	Complaints and requests for service
	Education
	Food and feed sampling at retail premise
	Food and feed safety alerts and incidents
Communicable Disease Team (Commercial)	Responsible for the registration/approval of feed premises.
	Communicable disease
Specialist Services (Enterprise and Specialist Services (Industry))	Food Safety and Standards Intervention programme at manufacturing and packing premises, distributors and primary producers.
	Complaints and requests for service
	Approval of product specific establishments
	Fee Paying Advice Visits (Food Standards & Food Safety)
	Feed safety and standards during manufacture
	Food and Feed Sampling at manufacturing premises
	Co-ordination of Events Panel attendance/follow up
	Provision of training courses for businesses
Specialist Services (Enterprise and Specialist (Environment))	Feed safety and standards on farms
	Complaints and requests for service
	Feed Sampling
	Inspection
	Feed safety alerts and incidents
Specialist Services (Major investigations)	Investigation of any large scale investigation involving food or feed

2.4 Demands on the Food and Feed Service

2.4.1 Food Safety

The region has approximately 5998 food premises with Bridgend having approximately 1301 premises, Cardiff approximately 3441 premises and the Vale of Glamorgan 1256. All require a range of interventions. The following tables provide a profile of the food premises within the three areas by type. Food business operators must register their businesses with the food authority except where the establishment requires approval. Of the 5998 identified food businesses 17 are approved (4 Bridgend, 12 Cardiff and 1 Vale).

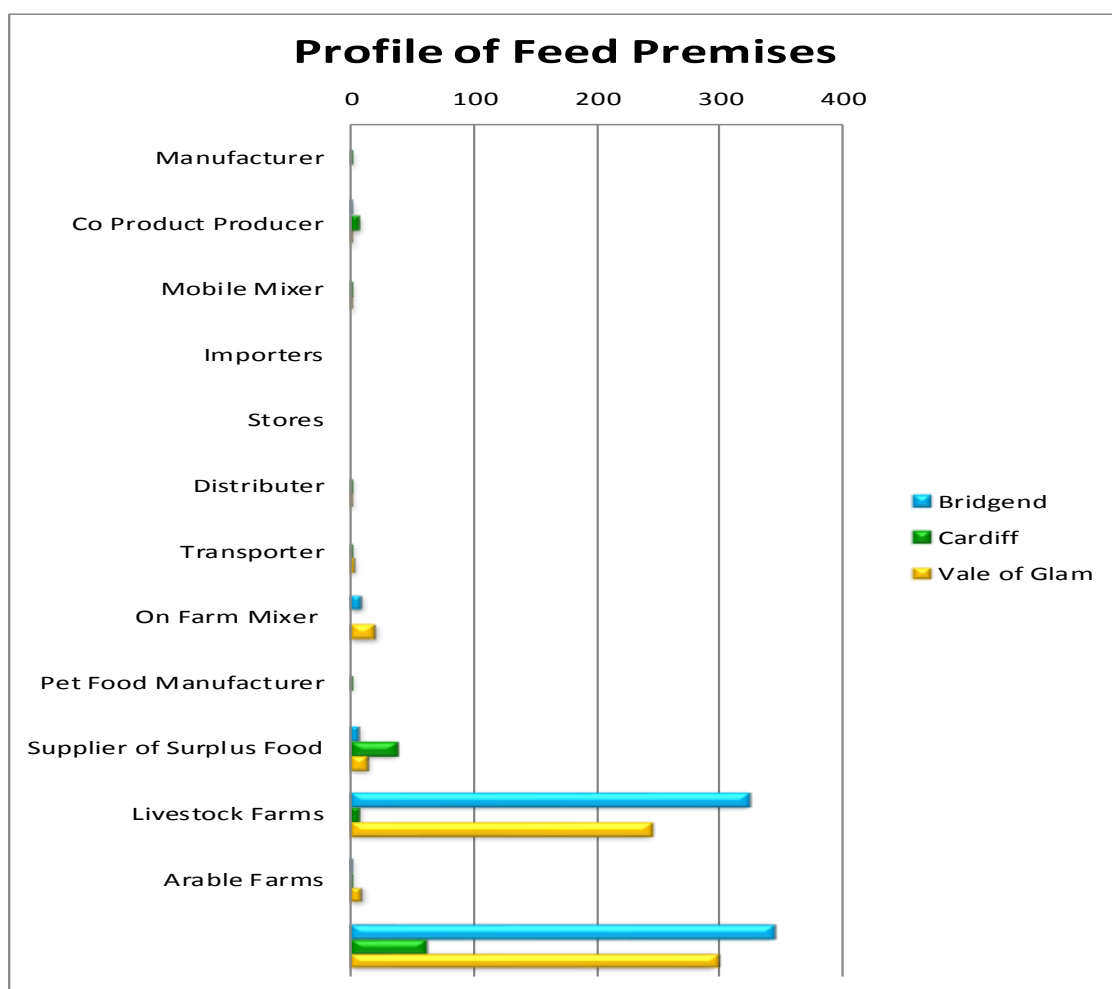


2.4.2 Feed Safety

Feed safety is a vitally important element of controlling food safety and this service takes a holistic view ensuring compliance from farm to fork; feed that is fed to animals eventually enters the food chain. The legislation requires that premises involved in the feed chain producing, trading in or using animal feed must be registered with local authorities; and those that manufacture complex feeds have to be specifically approved. The businesses described include livestock farms, livestock farms which mix using additives, arable farms that grow, use of sell crops for feed use, fish farms, surplus food suppliers i.e. businesses supplying food e.g. bread suitable for re-entering the feeding stuffs market, co-product producers e.g. a by-product of a manufacturing process such as brewers grains which can be used in animal feed, transporters of feed, manufacturers of feeding stuffs including pet food, stores and distributors such as animal feed merchants.

The Feed Law Code of Practice re-issued in October 2014 requires that inspection of animal feed premises in line with a risk based approach. There are currently 296 premises registered under these Regulations in the Vale of Glamorgan and 59 in Cardiff and 342 in Bridgend.

Bridgend and the Vale of Glamorgan are principally rural areas dominated by livestock farming and these businesses although high in number are primarily low risk feed premises. The high risk feed premises such as manufacturers, distributors and surplus food suppliers are situated within Cardiff and the larger towns of Bridgend and the Vale of Glamorgan. There are 59 registered feed premises in Cardiff with the majority being retail premises supplying surplus food for the production of feed. The profile of these premises can be found below.



2.4.3 Service delivery points

Food and feed related services are delivered from 3 service delivery points and while the service primarily operates office hours from Mondays to Fridays, weekend and out of business hours duties are carried out as the need arises. Shared Regulatory Services also operates an out of hours duty officer scheme for emergency situations.

SRS.wales

Tel: 0300 1236696



@SRS_Wales



<http://www.srs.wales>

Bridgend

Civic Offices
Angel Street
Bridgend
CF31 4WB

Normal offices hours:

Monday to Thursday: 8.30am to 5.0pm

Friday: 8.30 am to 4.30pm

Cardiff

Level 1
County Hall
Cardiff
CF10 4UW

Normal office hours:

Monday to Thursday: 8.30am to 5.00 pm

Friday: 8.30 am to 4.30pm

Vale of Glamorgan

Civic Offices
Holton Road
Barry
CF63 4RU

Normal offices hours:

Monday to Thursday: 8.30am to 5.00pm

Friday: 8.30am to 4.30pm

2.4.4 External Factors and emerging issues impacting on the Service

Funding arrangements - We are delivering the SRS with a reducing resource. The SRS has reviewed funding agreements with the partner Councils and agreed a three year programme with reductions of 5% p.a. These reductions need to be found from core services which will necessitate some realigning of services, further refinement and changing the way we work. That will mean delivering our services using a risk based approach to all activities and examining new ways of prioritising our services which may result in a reduction in service provision, or the charging for some services and difficult decisions about the level of service provision. These efforts will help reduce the impact of reduced funding, but maintaining performance in light of the latest budget cuts may affect the service ability to maintain performance at existing performance levels.

Income streams already exist within the Service however there will be a need to extend these opportunities to meet the target set for 2018/19. Income generation provides a means to offset some of the likely budget reductions that the service will face over the next three years and will be generated through a number of activities. This includes the development of products and services

that can be sold to businesses, offering to provide services to other local authorities and could include expanding the partnership to include new partners.

Income generation is not an answer in itself and cannot be used to generate a profit. Consequently income generation may not be sufficient to prevent reductions in service delivery, but may allow the service to maintain service delivery at existing levels.

Increase in new food businesses in Cardiff - The prosperity and increasing popularity of the City of Cardiff means that the number of new food businesses attracted to the City is constantly increasing. In just 5 years, the total number of food premises has increased by over 460 premises. This places a significant impact on resources, particularly as the Food Law Code of Practice requires new food businesses to be inspected within 28 days of opening. This is further exacerbated if businesses have poor compliance on initial inspection, requiring the need for further intervention.

Importation of food at Cardiff Airport - From May 1st 2018 Qatar Airlines will be starting to operate flights from Cardiff International Airport with 5 flights a week in the Winter Season and daily flights in the Summer season. Included with each flight is a cargo element which is to incorporate the importation of vegetables and the export of fish. This will necessitate an increase in the level of surveillance and inspection completed to ensure that the food entering the border is safe to eat and permitted to enter. The airport does not currently have the status of "Border Inspection Post" or "Designated Point of Entry" to permit any products of animal origin or higher risk foods not of animal origin entering via it.

Major events - SRS plays a central role in the running of major events across the three local authority areas. Our primary areas of input are around food safety, ensuring that event caterers and other food outlets are at least broadly compliant; and health and safety, ensuring that arrangements for the running of the event fall within acceptable standards within the context of the Health and Safety at Work Act. Additional support can be tailored around specific events, as in the case of stadium pop concerts and boxing matches where there is a danger of counterfeit goods being sold outside venues. Cardiff's Capital City status brings with it extra demands and challenges. The City hosts many outdoor events across a wide range of venues. The time spent planning, organising, monitoring events and inspecting and sampling at food premises during events each year should not be underestimated. In order to ensure proper co-ordination with all partner agencies in preparation for the smooth running of major events, the Service is part of the Events Liaison Panel at Cardiff Council and the Events Safety Advisory Groups at both Bridgend and the Vale of Glamorgan

Revision of Food Law Code of Practice - The Food Law Code of Practice is required to be implemented and followed by Food Authorities in performing their functions. A new revised version has recently been published which will in turn require the service to complete review of all policies and procedures to ensure that they reflect its requirements.

Regulating our Future – The Food Standards Agency (FSA) are currently consulting on changes to the food hygiene and food standards inspection model and regulatory framework. It will be important that SRS engages with the FSA in relation to these proposals to ensure that we are involved in its design and ultimately to ensure food is safe and labelled correctly. Furthermore any modifications to the current regime will involve many changes to the way food hygiene and food safety is delivered by SRS and it will be important to prepare for these alterations as they emerge.

Developing Competence of Food Safety Officers to Address Food Standards Interventions- In the coming months a training programme has been designed to develop the confidence and competence of food safety officers in food standards. The aim is to maximise the use of resources, by enabling food safety officers to complete the food standards intervention at the same time as the food safety inspection of low risk food standards businesses.

Food Standards Agency audit – The FSA Audit Report based on the audit conducted in March 2017 has recently been agreed and published by the Food Standards Agency. The report requires a number of improvement areas for the service, many of which are already in process. A copy of the full audit report is contained within Appendix F.

Increase in enforcement action by the service –The impact of enforcement action required as a result of the aforementioned FSA audit report has seen a vast increase in investigations conducted by the department. The FSA requested that a report be considered for prosecution for every premise issued with a Food Hygiene Rating of zero or for every voluntary closure issued. The volume of work required for preparation of such reports should not be underestimated; whilst officers are conducting the investigations the numbers of inspections conducted will be reduced.

Allergens – Food Allergies have a major impact on many consumers within the community. In the UK alone around 10 people die from allergic reactions to food every year due to undeclared allergenic ingredients and an estimated 1-2% of adults and 5-8% of children have a food allergy which accounts for around 2 million people within the population. The continued non-compliance found by officers within the service demonstrates that compliance with the associated legislation remains a challenge for the service. Further survey work is planned for this financial year to target this area of work.

Food Fraud – Food fraud is a crime that is an emerging risk given the complexity of global food supply chains. Food fraud is estimated to cost the UK food and drink industry up to £11 billion per year. Food fraud also has the potential to be a major food safety issue – an extreme example of this is fake alcohol. Economic decline has resulted in an increase in food fraud with unscrupulous traders endeavouring to save money by placing food on the market that fails to meet food safety requirements and poses a risk to public health. Generally, premium food and drink is the most common target, but the horsemeat scandal was an example of fraud in food that was low-priced but mass-produced. And while adulteration and substitution tend to grab the most headlines, there are many complex forms of food fraud emerging. It is important that officers are kept up to date with emerging trends and have the relevant skills to identify and act on such issues.

Review and standardisation of policies and procedures - The joining together of 3 local authority regulatory services operating different working practices, policies, procedures and using different systems and forms requires standardisation across the Service in order to provide consistency and efficiency across the organisation. The service has made significant progress in harmonising these activities. There are a number of support services provided by partners that are outside the Shared Regulatory Service that cover areas such as Freedom of Information, corporate complaints, etc. that need to be managed effectively. The Service will develop protocols for both the sharing of data and the provision of support services to ensure service provision remains unaffected. The advent of a new data protection regime is likely to produce a level of complexity that will need careful consideration.

Remaining relevant to the three Councils – The creation of SRS delivering services across three local authority areas resulted in the transfer of the administration of services and staff to the Vale of Glamorgan Council who act as the host authority for the Service. The Service, although jointly funded by the participant authorities, also has a single consistent identity and branding which is not associated with any one Council. The Shared Regulatory Service and the important services we provide will therefore need to be promoted actively across the three Councils to ensure their continuing support for the venture.

Tascomi Database – The implementation of a shared database across the 3 authorities to replace 4 versions of Civica was crucial to the development of SRS as an integrated shared service. The new Tascomi database was implemented in February 2017 and required considerable work to prepare and migrate data across to the new system. The system is now operational however work continues to ensure the system is fit for purpose and fully embedded within the service. This is particularly the case in relation to food standards and food hygiene where further work is required in relation to the accuracy of premise data.

Seasonal demand – Porthcawl is home to the largest caravan park in Europe which attracts a large influx of tourists during the summer months. This results in a number of food premises which operate on a seasonal basis, both at the caravan site, the funfair and within the town. Inspections and other enforcement activity at these premises take place during the restricted trading period. Likewise Barry Island as a sea side attraction equally attracts a number of tourists during the summer months. Resulting in a number of food premises operating on a seasonal basis with food business operators changing on a frequent basis.

2.5 Enforcement Policy

Fair and effective enforcement is essential to protect the economic, environmental and social interests of the public and business. Decisions about enforcement action and in particular the decision to prosecute, has serious implications for all involved and for this reason, the Shared Regulatory Service has adopted a Compliance and Enforcement Policy.

The Compliance and Enforcement Policy sets out the standards that will be applied by the Service when dealing with issues of non-compliance, and what residents, consumers and businesses can expect. Such a policy helps to promote efficient and effective approaches to regulatory inspection and enforcement, and balances the need for improvement in regulatory outcomes with minimising unnecessary burdens on business.

Traditionally based upon the principles of the Enforcement Concordat and the Regulators Compliance Code, local authority Enforcement Policies must now reflect the Regulators Code of 2014 and the regulatory principles required under the Legislative and Regulatory Reform Act 2006

The Regulators Code is based upon six broad principles:

- Regulators should carry out their activities in a way that supports those they regulate to comply and grow;
- Regulators should provide straightforward ways to engage with those they regulate and hear their views;
- Regulators should base their regulatory activities on risk;
- Regulators should share information about compliance and risk;

- Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply;
- Regulators should ensure that their approach to their regulatory activities is transparent.

3. Service Delivery

3.1 Interventions at Food and Feeding Stuff Establishments

It is the policy of the Shared Regulatory Service to ensure that food and feed businesses within its jurisdiction receive interventions e.g. inspections in accordance with the Food Law and Feed Law Codes of Practice and Practice Guidance. This requires local authorities to have a programme of interventions which is adequately resourced and provides sufficient information to show that businesses are complying with food law.

3.1.1 Food Hygiene Interventions

The planned programme for food hygiene interventions is shown below. The programme is based on the requirements of the Code of Practice and Practice Guidance. Following inspection all food businesses are risk rated from A (highest risk) to E (lowest risk). A suitable intervention is required in accordance with that risk rating.

Official controls are required at prescribed frequencies for risk categories A-C and category D premises. Category A businesses require an inspection twice a year, category B once a year and category C, at 18 month intervals. Category D interventions, however, can alternate between an official control, e.g. a full inspection, and a visit by a non Environmental Health Officer.

Low risk food premises (Category E) need not be subject to an official control, however they must be subject to an alternative enforcement strategy not less than once in any 3 year period, this could include a postal questionnaire.

When a full inspection is completed as an intervention on an establishment, a risk assessment will be made based on the Officer's findings. This will result in some movement of food businesses between the different risk categories. Food Establishments with improved performance will move to a lower risk category and under-performing businesses will move to high risk categories and receive more frequent interventions.

Since the **Food Law Practice Guidance (Wales)** was revised in February 2012 all new food businesses should receive an inspection within 28 days of opening.

While the Code of Practice allows some lower rated businesses to be subject to interventions other than a full inspection, the introduction of the Food Hygiene Rating Act means that in order to be given a hygiene rating, food businesses within scope of the Act need to have received a full inspection.

Proposed food hygiene interventions 2018/19

A – C Rated Food Businesses

100% of A and B rated food businesses will be subject to a full inspection.

90% of C rated food businesses due an intervention this year are targeted to receive either a full inspection or a verification visit if the business is broadly compliant and has a food hygiene rating of 5.

D rated food businesses

D rated food establishments can alternate between a full inspection and a non official control e.g. an information gathering visit using a questionnaire. No new risk rating or food hygiene rating score is permitted from a non official control.

If at the time of the information gathering visit there is concern that the level of food safety has deteriorated, or the food operation has changed, then the intervention will be referred to a competent officer for a full inspection.

E rated food businesses

E rated food businesses may be subject to an alternative enforcement strategy only, i.e. a postal questionnaire. (No new risk rating or food hygiene rating score is permitted from this type of intervention). The information received will allow assessment of the current level of compliance with food hygiene legislation and highlight any changes to the business. Where changes in management, activities or serious deficiencies are identified an inspection will be undertaken.

For 2018/19 the service will continue the use of an alternative enforcement strategy for E rated food establishments. Utilising students who have undertaken the Food Safety module either at degree or masters level.

Inspection of New Businesses

Unrated food establishments will be subject to a full inspection. This should be undertaken within 28 days of their opening.

Cardiff has a high turnover of business ownership which presents a challenge for the Food and Port Health Team over and above the routine inspection programme. During 2017/18 561 new premises were identified in Cardiff. In Bridgend 195 new premises were identified and 179 in the Vale of Glamorgan.

Issues are encountered across the three areas due to unnecessary resources being spent on visiting new businesses that fail to open for trade on their initial specified date. This has a subsequent adverse effect on the ability to complete the inspection within 28 days of the programmed inspection date.

Food Hygiene Revisits

Inspection of food businesses often requires follow up visits to ensure compliance with food safety requirements. The intervention and revisit procedure requires that all businesses rated 0 are

revisited within 28 days and all those rated 1 or 2 are revisited within 3 months. Officers are also requested to revisit to ensure that any food safety issues of concern are fully addressed.

In land Imported foods

During the inspection of food businesses, officers consider the origin of imported foods. Any indications that food may not have been subject to correct import controls are investigated and, where necessary, the food is removed from the food chain.

Port Health Functions

As a Port Health Authority, Shared Regulatory Services is responsible for the enforcement of food law and promotion of food safety issues on board all ships and aircraft arriving in Cardiff and the Vale. This includes responsibility for monitoring the safety of imported food and feed at the point of import, the control of infectious disease, undertaking ship inspections, enforcing food safety and hygiene standards and general public health within the Port.

Currently neither the Port of Barry nor Cardiff International Airport are Border Inspection Posts or Designated Points of Entry and there is no importation of food products of animal origin or feed or high risk foods not of animal origin. Potentially all ports provide an entry point for food stuffs within and outside the EU and as such the Service carries out a range of health controls enforcing regulations on behalf of central government.

In the meantime however, the Service will continue to monitor food produced for and delivered to aircraft, inspect aircrafts and respond to reports of illness on board in accordance with International Health Regulations, inspect ships at the ports of Cardiff and Barry either at the request of a shipping agent to issue Ship Sanitation Certificates or as part of a planned inspection.

The Port Health Service Plan outlines in detail the work undertaken in relation to the Authority's Port Health functions including food safety.

The table below illustrates the risk ratings of premises, the intervention frequencies and the total number of interventions to be delivered during 2018/19.

Food Safety Intervention Plan 2018/19					
Risk Category	Intervention frequency	Number of Interventions due at start of year (Including any backlog)			
		Bridgend	Cardiff	Vale of Glamorgan	
HIGH RISK	A	6 mths	8	36	2
	B	12 mths	69	236	71
	C	18 mths	411	979	329
	High Risk Total		488	1251	402
ME DIU	D	2 years	103	261	114

	E/AES *	3 years	85	113	101
	Medium to low Risk Total		188	374	215
NEW BUSINESSES	Unrated (New business identified at 1 April)		0	5	1
	Unrated (New business identified during course of year)		Est 195	Est 556	Est 178
	Unrated total (Estimate based on 2017/18 no. identified)		195	561	179
REVISIT	Revisits (Estimate based on 2017/18 actual undertaken)		28	348	42
TOTALS			899	2534	838

Source: Planned Inspection Monitoring Programme

Food Safety Projects

The following projects will be undertaken during 2018/19.

Food Hygiene Rating Scheme Display Project - The Food Hygiene Rating (Wales) Act 2013 and regulations made thereunder to ensure informed consumer choice require food business operators to display their current food hygiene rating in a conspicuous place at the entrance to the business.

Shared Regulatory Services intends to target all 0 rated food businesses across Bridgend, Cardiff and Vale of Glamorgan to check that the current food hygiene rating is being displayed in an appropriate place.

The aim of the survey is to ensure that all businesses are compliant with display requirements to not only ensure informed customer choice but also to assist in fair competition for food businesses to support the local economy.

Failure to display the current rating in accordance with the requirements without reasonable excuse will result in the service of a fixed penalty notice to address the issue and eventual prosecution if not addressed.

Less than thoroughly cooked burger survey - Burgers can be contaminated with food poisoning bacteria such as E.coli O157 and therefore in order to be served safely have to be thoroughly cooked unless strict food safety procedures are in place and they are sourced from approved suppliers. Currently only one burger chain in Cardiff is able to serve less than thoroughly cooked burgers. Following on from a joint survey carried out with Trading Standards to assess if burgers served in Cardiff were being thoroughly cooked non-compliant businesses will be revisited this year. The aim of the exercise is to ensure that they have complied with previous enforcement action taken.

Mobile vendors - Mobile vendors include market stalls and vehicles as, or converted for use as shops. Such food businesses have additional food hygiene risks to consider due to the limited space and inability to have continual service supplies such as water, heating and plumbing.

The Service is looking to undertake a local survey of mobile vendors to assess the adequacy of cleaning practices (including the microbiological quality of the water used) by swabbing surfaces and analysing the microbiological quality of food sold ensuring suitable remedial measures are taken where unsatisfactory samples are found.

The survey will commence May 2018 and will run until March 2019, at which point an evaluation of the results will inform further sampling programmes. It is hoped that 60 samples are to be taken.

Ice survey - A Wales wide sampling survey was undertaken in 2017 to 2018 to analyse the microbiological quality of ice in coffee shops, and found that from 164 samples 23.8% (39) were unsatisfactory. A BBC Survey also recently found drinks from cinemas contained unacceptably high levels of bacteria. The service has therefore decided to extend the survey to determine the microbiological quality of ice used to cool drinks from licensed and leisure outlets across Shared Regulatory Services ensuring suitable remedial measures are taken where unsatisfactory samples are found. Approximately 32 samples are hoped to be obtained.

Shopping Basket Survey - The Welsh Food Microbiological Forum annually provide a list of food products to be sampled that have an emerging or identified risk. Participation by the local authorities in this survey helps to identify non-compliant foods for intelligence data gathering and action to be taken against securing food safety. Approximately 20 samples are hoped to be obtained for further action to be considered as appropriate.

Ice cream and Cream Nozzle Survey - When using a machine to dispense cream or ice-cream there is the potential to introduce micro-organisms if the machine has not been cleaned properly, has been handled with unclean hands, or lubricated with unsterile oil. This survey is therefore to be introduced across Shared Regulatory Services to gather information on food hygiene practices used by businesses using dispensing machines, which could be used in future to make recommendations to improve hygiene standards. Microbiological testing will be undertaken of the cream and ice-cream before and after it has been dispensed and of the vegetable oil used to lubricate the machines. Approximately 100 samples are hoped to be taken.

Food Safety Event - SRS is looking to host another Food Safety Event in 2018/19 building on the success of the first one held in the Principality Stadium in February 2017. These Events gives SRS an opportunity to engage with Food Businesses and give training on new legislation, topical issues or guidance to improve Food Safety compliance.

Food Safety Training Expansion - SRS is looking to expand the training offer to business this year to include HACCP. HACCP is a fundamental part of the Food Safety Management System for most businesses and from the interventions undertaken by SRS it is clear that this training would be of beneficial as part of our training offer. SRS also piloted HACCP training in 2017/18 and positive feedback was received.

3.1.2 Food Standards Interventions

Food Standards is a legislatively complex area covering meat speciation, composition, labelling, claims, allergens, chemical contamination (such as heavy metals and carcinogens such as mycotoxins), compositional standards (such as meat content), additives, food fraud and genetically modified ingredients and foods. It also covers articles that come into contact with food and ensuring that there is no transfer of chemicals including carcinogens.

Primary producers are the initial growers and manufacturers of all food commodities such as meat, grains, eggs, honey etc. and the most common primary producers are farms. As with food and feed businesses, primary producers have to register with the authority and are subject to the same controls as more regular food and feed businesses.

The Service uses the food code of practice as a risk assessment model and the Food Safety Act. Work was undertaken during last financial year to ensure all areas are using the same assessment model ensuring a harmonised approach.

Food standards premises are divided into three categories namely high, medium and low. The Food Standards Code of Practice indicates that high risk premises are inspected every 12 months, medium risk premises are inspected every 24 months and low risk premises could be subject to an alternative enforcement strategy at least once during any 5 year period. Some establishments which undertake food activities do not meet the definition of a food business establishment and therefore fall outside of the scope of Regulation (EC) No 852/2004. These premises do not carry a food standards risk rating however they do remain subject to the provisions of the Food Safety Act 1990 and Regulation (EC) No 178/2002

High risk businesses

100% of high risk food businesses will be subject to a full inspection in relation to food standards.

Medium to low risk businesses

Currently the service is resourced to only deliver an inspection programme for high risk and new businesses only, however medium and low risk inspections are picked up via surveys, complaints and by using Food Safety Inspection Forms throughout the year. Furthermore the training of Food Safety Officers to develop their confidence and competence in food standards will enable them to complete food standards interventions at the same time as the food safety inspection at low risk food standards businesses. It is likely the service will see the full impact of the aforementioned training in the next financial year.

New business

Unrated food establishments will be subject to a full inspection. This should be undertaken within 28 days of their opening.

Cardiff has a high turnover of business ownership which presents a challenge over and above the routine inspection programme. During 2017/18 579 new premises were identified in Cardiff. In Bridgend 191 new premises were identified and 182 in the Vale of Glamorgan.

Issues are encountered across the three areas due to unnecessary resources being spent on visiting new businesses that fail to open for trade on their initial specified date. This has a subsequent adverse effect on the ability to complete the inspection within 28 days of the programmed inspection date.

Food Standards Revisits

Food visits that fail to comply with significant statutory requirements should be subject to appropriate enforcement action and a revisit to assess compliance. Failure to comply with significant statutory requirements may include failure to comply with:

- A single requirement that comprises food standards or prejudices consumers
- A number of requirements that, taken together, indicate ineffective management.

Each situation should be judged according to the circumstances and the authorised food officer should make a professional decision as to whether a revisit is appropriate. The timing of the revisit should be appropriate depending on the matters which require attention. The authorised food officer should make a professional judgement and discuss the timescales with the proprietor. Re visits should be undertaken by the officer who conducted the original intervention and the results of the revisit should be recorded in the relevant premises file and computer database. If the revisit reveals that the proprietor has failed to comply with any legal requirement then the appropriate enforcement action should follow.

Generally revisits are undertaken where there are significant breaches of the legislation. Where an officer intends to take action or make recommendations that may affect the policies or procedures of a business with outlets outside the SRS boundary they should consult the relevant Home Authority.

Approximately 10% of premises require a revisit.

Food Standards Intervention Plan 2018/19				
Risk Category	Intervention Frequency	Number of Interventions due at start of year (including any backlog)		
		Bridgend	Cardiff	Vale of Glamorgan
High Risk	12 mths	5	21	1
Medium Risk	24 mths	Currently the service is resourced to only deliver an inspection programme for high risk and new businesses only, however medium and low risk inspections are picked up via surveys, complaints and by using Food Safety Inspection Forms throughout the year.		
Low risk	60 mths			
New business	Estimate based on 2017/18 no. identified	191	579	182
Re-visits	Estimate based on 2017/18 undertaken	4	20	4
Total		200	620	187

Food Standards Projects

SRS will participate in a number of regional projects agreed by the Glamorgan Group (GG) and include:

- **Levels of acrylamide in specified food products** - All food businesses operators (FBOs) will be required to put in place simple practical steps to manage acrylamide within their food safety management systems. This will ensure that acrylamide levels are as low as reasonably achievable in their food. From April 2018 Commission Regulation (EU) 2017/2158 will take effect. This will establish best practice, mitigation measures and benchmark levels for the reduction of the presence of acrylamide in food.
- **Allergen training for takeaway premises and SME's** – Food business operators will be invited to participate in training sessions supported by the Food Standards Agency.
- **Levels of artificial colours in Indian takeaway dishes** - Following the GG survey last year a number of take away premises were found to be non compliant with the Food Additives, Flavourings, Enzymes and Extraction Solvents (Wales) Regulations 2013. All premises have received advice and will be sampled formally this year.
- **Food Supplement Survey** - SRS participate annually in Operation OPSON, a global initiative jointly coordinated by Europol-INTERPOL focusing on counterfeit and substandard food, and the organized crime networks behind this illicit trade. In the UK activities are co-ordinated by the National Food Crime Unit (NFCU) and the Food Standards Agency (FSA).

Following on from OPSON VI last year Shared Regulatory Services carried out a further survey purchasing food supplements from on line sellers and gyms within the three Local Authorities and submitting them for testing for the presence of DNP and DMAA. During the survey 8 samples were submitted and three samples were found to contain DMAA. As a result of this high failure rate SRS will be participating in a further survey in 2018 sampling from on line sellers of supplements for the presence of DMAA in the products sold.

- SRS are also carrying out further surveys that are highlighted on the sampling plan and include:
 - Undeclared allergens in kebabs
 - Undeclared allergens in satay sauces
 - Quality and speciation of fresh fish
 - The presence of cows milk in goat/ sheep cheese.

3.1.3 Feed Hygiene Interventions

The BSE health scare during the last two decades revealed the fundamental link between the feed we give to animals and our own health. Consequently feed safety is now considered a fundamental part of food safety and is enforced by the Service.

The controls are similar to those relating to food. A register is maintained of feed businesses, and inspections are completed according to their risk rating. Checks are made during inspections to ensure that feed is stored hygienically and that feed placed on to the market and fed to food-producing animals is safe and labelled correctly to allow for product traceability and recall in the event of a feed incident. The ring fenced funding administered by the FSA has allowed Shared Regulatory Service to review and refine the information held on the register which in turn has enabled the better identification and targeting of feed premises for interventions.

The planned programme for feed hygiene interventions is shown below. Animal Feed premises are risk rated following the Feed Law Code of Practice risk assessment framework, which provides appropriate risk assessment criteria for officers to assess premises against. This is used to identify high risk premises, and to plan the animal feed inspection programme in line with our agreed programme which is funded by the FSA. The assessment of feed businesses is undertaken on each inspection and the assessment is updated by the officer following the inspection.

The risk assessment for feed premises is undertaken against the following factors:

Risk to Animal/Human Health and/or Other Businesses

This factor considers the potential adverse effect on animals/human health, and the consequences for other businesses, should the establishment not comply with feed legislation.

Extent to Which the Activities of the Business Affect any Hazard

This factor considers the type of activities that the feed business undertakes, the need for any of those activities to be closely monitored and controlled, and the feed business operator’s potential effectiveness in maintaining compliance with animal feed law

Ease of Compliance

This factor considers the volume and complexity of animal feed law that applies to the business and with which it has a responsibility to ensure compliance.

Animals and People at Risk

This factor considers the number of animals/people likely to be at risk if the business fails to comply with animal feed legislation.

Level of (Current) Compliance

This factor considers the level of compliance with animal feed law observed during the inspection. Adherence to relevant UK or EU Industry Guides to Good Practice and standards produced by assurance schemes should be considered.

The above factors are allocated a range of scores depending on the level of compliance, with higher scores awarded where high risks are considered. The Code of Practice sets out the inspection frequency requirements depending on the risk score as follows:

Feed Premises Inspection Frequencies as set out by the Feed Law Code of Practice

Risk Category	Points Range	Minimum Inspection Frequency
A	147-200	At least every 12 months (1yr)

B	122-146	At least every 24 months (2yrs)
C	106-121	At least every 36 months (3 yrs)
D	85-105	At least every 48 months (4 yrs)
E	0-84	At least every 60 months (5yrs)

Under the Code of Practice, the inspection of higher risk businesses takes preference over the inspection of lower risk. However, implementing an inspection programme which includes only establishments that are rated as high risk is also not acceptable.

All feed business operators registered or approved for high risk feed activities such as manufacturers, surplus food suppliers, co-product producers and distributors are required by the Feed Law Code of Practice (Wales) to have interventions undertaken by a qualified, competent and authorised officer. Low risk premises such as livestock farms which may or may not mix with additives, arable farms, official controls at primary production and at points of entry can have interventions undertaken by a competent authorised officer.

High risk business

In line with the risk assessment process high risk premises require an annual inspection, owing to the potential risks to the feed chain. On the whole the manufacturing of animal feed, feed additives, anti-toxicants, proteins or compound feeds have higher risk factors in the risk assessment. Within SRS there are very few of these type of premises in operation. Currently the number of Category A – High Risk banded premises is very low with only 5 premises registered.

Medium to low risk business

In terms of medium risk categories (B-C), there are limited number of premises, (8 No each) within SRS, and the majority of these are suppliers of surplus food which is placed into the feed chain. Examples of these are brewers with surplus grains and supermarkets with surplus breads etc.

The majority of the feed premises within SRS fall within the Cat E risk category, of low. This is owing to the fact that the majority of the feed premises are livestock farms, where many farms buy in feed to provide their animal's feed during the winter months when grazing is restricted.

Feed Safety Re-visits

Re-visits are undertaken in order to ensure compliance as a result of an identified non conformity during an initial inspection or as a result of a complaint. It is therefore not possible to plan the number of re-visits that will be undertaken during the year. All revisits are recorded on our quarterly return which is provided to the FSA.

New Businesses

In line with the Feed Law Code of Practice, SRS must make use of information supplied by feed business operators in connection with the registration or application for approval of their feed business establishments in accordance with Article 31 of Regulation (EC) No 882/2004, in order to determine when to carry out an initial inspection, there is no set target requirement. However SRS will ensure that all new feed businesses and those subject to Annex II of Regulation (EC) 183/2005

will as a minimum receive a full inspection within 3 months of opening. Similarly new businesses carrying out primary production only will be subject to a full inspection within 3 month of opening.

The numbers of new feed businesses which open each year are very small. The majority of feed businesses falling within the remit of Shared Regulatory Services are well established with little turnover of business ownership.

However in 2017/18 there has been an increase in the number of new feed businesses particularly micro breweries who sell on waste grains as animal feed. In 2017/18 there were 6 new premises of this type which opened in the SRS area.

Feed Safety Intervention Plan 2018/19				
Type	No. of inspections due			
	Bridgend	Cardiff	Vale of Glam	Total
Inland Feed inspections				
Manufacturer (A01-08 and R01-04)		1		1
Co Product Producer (R12)		3	2	5
Mobile mixer (R04)				0
Importers				0
Stores (R09)				0
Distributor (A01-08, R01-03, & R05)				1
Transporter (R08)			1	1
On farm mixer (R10 Annex II)			2	2
On farm mixer (R11)			4	4
Pet food manufacturer (R06)		1		1
Supplier of feed materials/surplus food (R07)	3	6	2	11
Total inland feed inspections				26
Feed Hygiene at Primary Production inspections				
Livestock farms (R13)	25	7	35	67
Arable Farms (R14)			3	3
Total Feed Hygiene at Primary Production inspections				70
Total feed premises/inspections				96

Feed Safety Projects

Currently FSA has no funding available for large scale feed projects. SRS will however explore other options, particularly developing starter packs for new businesses such as breweries and pet food manufacturers.

3.2 Food and Feed Complaints

There are occasions where unsafe practices or potential risks come to light as a result of a complaint or concern raised by a member of the public or employee and these are treated as complaints. Complaints received vary from foreign bodies, to mould, to compositional standards

or to the perception that the food or feed is spoiled. Following a complaint an Officer will carry out an investigation to verify the existence of the problem and where necessary seek to minimise the risk. This will often require the procurement of a sample, which would not form part of the sampling programme.

Support from the Public Analyst and Public Health Wales Laboratory is needed to complete investigations which place a financial implication on service provision.

It is estimated that for the period 2017/18 the following numbers of complaints could be received.

Complaint type	Bridgend	Cardiff	Vale of Glamorgan
Food Hygiene	59	390	67
Food Complaints	20	73	17
Food Standards	41	67	32
Feed Safety	0	1	0

3.3 Home Authority Principle and Primary Authority Scheme

The Home Authority Principle applies to businesses with outlets in a number of local authority areas. The aim of the scheme is to improve consistency in the way local authorities enforce food safety in a company throughout the country. A Home authority is an authority that acts as a focal point for liaison in food issues between a company and other local authorities that have outlets in their local authority area. Shared Regulatory Services assists local authorities and the FSA with their investigations whenever the need arises under the Home Authority Principle.

The Primary Authority Scheme builds on the foundations created by the Home Authority Partnership Scheme but entails a shift in the nature of the relationship between the regulated and the regulator bringing benefits to both parties. It offers local authorities the opportunity to develop a constructive partnership with a business that can deliver tailored “assured” advice and co-ordinated and consistent enforcement for the business and provides new funding arrangements, allowing local authorities to recover costs from partner businesses. The Primary Authority Scheme is especially beneficial to businesses with outlets in a number of local authority areas. The partnership is a legally recognised agreement that provides assured advice, ensures consistency of regulation between local authorities and reduces duplication of inspections and paperwork. The Office for Product Safety and Standards is promoting the Primary Authority Scheme in Wales.

Since October 2017, amendments to the Regulatory enforcement and Sanctions Act brought some significant changes to the Primary Authority scheme which has broadened the scope for SRS to enter into PA partnerships. As a result of this, some existing Primary Authority Partnerships in England now require additional support for Welsh Devolved matters so that businesses trading in Wales in sectors such as food, public health, agriculture, environmental protection, pollution control, and housing need to have a Welsh Primary Authority partner to issue assured advice in

Wales. SRS is currently supporting 6 of our 24 partnerships in this new capacity to ensure continued Primary Authority coverage in Wales which includes some 'big names' in the retail sector with a number of other prospective Welsh partnerships in the discussion phase.

The assured advice given by a Primary Authority must be adhered to by other local authorities. The primary authority can block enforcement if the enforcing authority has not considered the advice the Primary Authority has given. The Primary Authority may also develop inspection plans which enforcing authorities must follow.

It is however, a major goal of the new service to significantly increase these numbers. The Service will therefore be widely promoting Primary Authority partnerships going forward in order to maximise cost recovery for the new Service.

Conversely, where the Service deals with a business that has a primary authority agreement in place with another Authority, the following guidelines will apply: -

- Where Shared Regulatory Services acting as an enforcing authority has concerns about the compliance of a business that has a primary authority, it will discuss the issue with the primary authority at an early stage.
- If enforcement is envisaged Shared Regulatory Services will notify the primary authority of the proposed enforcement action through the Primary Authority Register.
- Shared Regulatory Services will follow published inspection plans and will only deviate if required to issue a food hygiene rating or events during a visit require this.

3.4 Advice to business

Shared Regulatory Services aims to assist businesses wherever possible by providing food and feed safety advice through a variety of channels, such as:-

- Advice provided as part of the inspection process;
- Responding to complaints and requests for service;
- Twice yearly food newsletter.
- Provision of information leaflets; (The provision of chargeable training and seminars;
- Promotion and participation in national events, such as Food Safety Week;
- Participation in working groups, such as Events Liaison Panel;
- Advice through Shared Regulatory Services website;
- Regular Food Business Forums;
- Practical targeted training at business premises;
- Paid for food hygiene advice visits available to all applicable food businesses;
- Food Standards advice provided on inspection and provision of labelling reviews on a chargeable basis.

3.5 Food and Feed Sampling

Sampling is important in helping protect public health and safety by testing food and feed to ensure they meet composition, labelling, chemical and microbiological safety standards in accordance with current Codes of Practice and guidance. Proactive sampling is undertaken in the following situations:-

- National, regional and locally co-ordinated surveys/programmes;
- Local food and feed producers;
- Home and originating authority samples;
- Complaints;
- Process monitoring and verification;
- Special investigations;
- Imported foods and feed;
- Inspections;
- Durability;
- Surveillance/screening;
- Water quality monitoring aboard ships, approved premises and food businesses served by private water supply.;
- Foods procured by the authority will be checked for compliance not only with legal standards but the specifications of the contract. This will include meat speciation.

Each year Shared Regulatory Services receives a budget allocation for microbiological analysis of samples from Public Health Wales. For 2018/19, SRS has been allocated £7,306 for Bridgend, £15,092 for Cardiff and £11,359 for the Vale of Glamorgan.

Food Hygiene Sampling

Sampling to secure the safety of food involves testing of food and water for microbiological, chemical, physical and/or radiological parameters (refer to attached plan contained in Appendix A).

The policy is largely determined by the Service's participation in proactive schemes co-ordinated through agencies such as the Food Standards Agency (FSA), Public Health Wales, Local Government Regulation (previously LACORS), Welsh Food Microbiological Forum (WFMF) and Public Health England. End product testing at approved establishments and high risk premises also constitutes an important element of the proactive work undertaken by the Service. Reactive sampling arrangements cover food importation, food poisoning outbreaks and the investigation of water and food complaints.

Food Standards Sampling

Priorities for food sampling are primarily identified after giving consideration to the risk to consumers in terms of safety or economic loss, data from the previous years sampling programme indicating areas of concern, emerging risks and priorities identified by local and National intelligence.

An area of growing concern surrounds the declaration and the cross contamination of allergenic ingredients in takeaway dishes. There have been a number of well publicised cases in the media that have highlighted the dangers of eating unsafe food sometimes with fatal consequences. In the last two years priority has been given to sampling products from takeaway premises to establish the presence of undeclared allergens and this work will continue alongside an educational programme aimed at smaller retail premises to increase compliance.

SRS will continue to support operation OPSON a global initiative jointly coordinated by Europol-INTERPOL focusing on counterfeit and substandard food, and the organized crime networks behind this illicit trade. In the UK activities are co-ordinated by the National Food Crime Unit

(NFCU) and the Food Standards Agency (FSA). SRS will focus on the supply of food supplements containing banned ingredients (DNP and DMAA) from on line sellers and gyms within the Local Authority.

Details of the planned sampling programme for Food Standards can be found at Appendix C.

Feed Hygiene Sampling

Contaminated or unfit feed given to animals can adversely affect animal health and the health of consumers of animal products (milk, meat and eggs). While the frequency of major feed incidents is low, the impact in terms of public health risk, cost and reputational damage can be high.

When incorporated into a programme of official feed controls, risk based sampling will ensure that a robust, targeted and proportionate level of enforcement takes place. The sampling programme is designed to detect/prevent potential threats to feed safety for food producing animals, based on officers' local knowledge as well as the national enforcement priorities set by the FSA .

The following sampling plan has been drafted and submitted to the FSA for approval:

Points of Entry	NUMBER OF PLANNED SAMPLES	COST OF ANALYSIS (£)
Annex II		
Heavy Metals		
Dioxins and dioxin like PCBs		
Mycotoxins		
Unauthorised GM		
Coccidiostats		
Labelling	7	980
Annex I and III		
Heavy Metals		
Mycotoxins	3	597.00
Salmonella	1	53.00
Labelling		
TOTAL	11	£1630

3.6 Control and investigation of outbreaks and food related infectious disease

All cases of communicable disease are investigated and full details of this work are outlined in the Communicable Disease and Health Service Report 2018/19. This includes the investigation of notified confirmed and suspected cases and outbreaks of food poisoning and food borne disease. These investigations are supported by reactive inspections of food businesses, food, water and environmental sampling of implicated premises and proactive delivery of bespoke training.

In relation to outbreaks, SRS follow the Wales Outbreak Plan 2014 which lays out the approach for managing all communicable disease outbreaks including food poisoning and is followed by all 22 local authorities in Wales in partnership with Public Health Wales and Food Standards Agency. The Plan is overseen by the Welsh Government and prescribes the manner in which outbreaks are identified, managed and controlled.

The Plan requires designation of a named Lead Officer for Communicable Disease for each local authority. Within SRS these are:

- Bridgend Angela Clack
- Cardiff Dr Sarah Jones
- Vale of Glamorgan Allyson Jones

This designation does not imply exclusivity. To ensure a prompt response and a timely investigation any of the 3 Lead Officers together with 2 technical officers respond and investigate suspected and confirmed cases throughout the 3 local authorities. This response is further supported by designated officers within the communicable Disease and Health and Safety Team.

The investigation of cases and outbreaks of food poisoning routinely includes:-

- The receipt and verification of laboratory confirmed isolates from Public Health Wales Microbiological Laboratories (via Tarian) and unconfirmed reports of food poisoning from Medical Practitioners, members of the public, cases, employers, other local authorities and rarely masters of vessels visiting the port and their agents;
- Telephone and less frequently face to face interviews with cases, close contacts and the provision of infection control advice;
- Managing exclusions of cases and contacts from the workplace, schools and health care settings;
- Liaison with GP surgeries, hospitals, Public Health Wales and other stakeholders during the investigation for the purposes of identifying the source of infection and preventing onward transmission;
- Undertaking site visits and applying control and preventive interventions;
- Managing the collection and submission of faecal samples;
- The collection, analysis and reporting of data relating to food poisoning;
- The investigation, management and control of outbreaks of communicable disease where food or water is, or is thought to be, the vehicle of infection.

- Taking the lead on and contributing to local and national communicable disease initiatives and surveillance programmes, examples have included the Campylobacter Good Practice Statement, Hepatitis E and E. coli O157 national surveillance programmes.

For all sporadic cases and small, or medium size outbreaks (up to 50 cases), the staffing resources provided by the Communicable Disease Team are sufficient, however for larger outbreaks, other staff within the Commercial Services Team would be available for interviewing cases and collection of specimens. For certain outbreaks comprising a significantly greater number of cases, or cases of greater severity or longevity, environmental health staff based in other teams would be trained and used in the data gathering and investigation process.

Campylobacter is the most common cause of food poisoning in the UK and many developed countries around the world. Most cases are sporadic and food borne outbreaks are rare. A number of risk factors are known to be associated with Campylobacter infection. The most common risk factor is poultry and in particular, the consumption of undercooked chicken and commercially prepared chicken. Other less common risk factors include dairy and other animal products, consumption of untreated or contaminated water, contact with animals, both domestic and farm, home sewerage problems and also travel abroad underlying medical problems such as diabetes and reduced gastric acidity also can increase the risk of infection.

All cases notified to the Service are contacted and interviewed primarily by phone and occasionally by face to face interview. Interview questions relate to exposures within the 10 days prior to the onset of illness and include clinical and demographic information, food history and environmental exposures, foreign and domestic travel, and with regard to chicken domestic food preparation and purchasing practices and commercial dining locations. A full report on the risk factors associated with Campylobacter Infection in Bridgend, Cardiff and the Vale of Glamorgan in 2017 can be found in Appendix B of the Communicable Disease and Health Service Plan 2018/19.

Other commonly reported cases of food poisoning include salmonella, cryptosporidium, giardia, E.coli O157, Hepatitis E and listeria. Investigations of these pathogens vary in complexity and control and preventive measures involve a diverse application of interventions for example identifying high risk activities such as food handlers, health care workers, child care workers, environmental sampling and sampling of close contacts and applying control measures such as exclusion from work, restricting employment and leisure activities, closure of business activities and training. Timely investigation is thus critical to the control and containment of these infections.

Outbreaks - In addition to the ongoing investigation of sporadic cases of food poisoning the service also identify and investigate outbreaks. An outbreak is defined as illness affecting two or more people who share a common exposure factor linked by time, place or person. The outbreaks are commonly caused by suspected Norovirus and the most common mode of transmission associated with these is either person to person or environmental contamination rather than foodborne transmission. Considerable work is undertaken to support educational and care home settings, particularly during the winter months to minimise the disruption caused by these viral infections. Norovirus infections are difficult to prevent in semi enclosed settings but their longevity and level of disruption can be greatly reduced with early intervention and application of effective public health measures..

Based on previous year's demand, it is estimated that the team will undertake the following investigations during 2018.

Communicable Disease Intervention Plan 2018			
Type	Number of Interventions estimated at start of year based on those received in the previous year		
	Bridgend	Cardiff	Vale of Glamorgan
Total No. of food poisoning notifications	243	692	260
No. of outbreaks	24	34	13
Total	267	726	273

The above figures are based on previous years demands only, the figures do not include predicted increase to notifications resulting from the introduction of molecular diagnostics to laboratory analysis.

The introduction of this more sensitive and efficient form of microbiological testing to some Welsh laboratories begins as a staged approach at the end of May. Public Health Wales have engaged with local authorities regarding the implications and the estimates of increased workload. Experiences of other areas that have implemented these changes report a varied impact but there are concerns regarding a potential 50% increase in campylobacter cases and 100-500% of giardia cases. It is currently an unknown situation and local authorities are being guided by the expertise of Public Health Wales who are monitoring the changes and drafting standard operating procedures for some pathogens of public health significance such as STEC (Shiga toxin producing Escherichia coli) This will affect all 3 local authorities in Shared Regulatory Services and the Communicable Disease Team are currently working with partners in readiness for its introduction.

3.7 Feed/Food Safety Incidents

The Service will on receipt of any food alert respond in accordance with the Food Safety Act Food Law Code of Practice and Practice Guidance .

A Product Withdrawal Information Notice or a Product Recall Information Notice is issued where a solution to the problem has been put in place – the product has been, or is being, withdrawn from sale or recalled from consumers, for example. A Food Alert for Action is issued where intervention by enforcement authorities is required.

Alerts requiring substantial reactive action will occur occasionally and irregularly. Sufficient resources will be allocated to deal with each warning as it arises, although this may require diversion from the planned programme of inspection.

If the Service becomes aware of a feed hazard we will take action to protect public and animal health at the earliest opportunity and in any event by the next working day. An assessment will be carried out to determine the likely scale, extent and severity of the risk, involving other agencies as appropriate. Enforcement options include, if necessary, detaining or seizing the feed

concerned. The Service will on receipt of any feed alert respond in accordance with the Feed Law Code of Practice and the Food Standards Agency.

Dealing with feed safety incidents includes the effective response to Feed Alerts issued by the FSA and ensuring that any action specified by the FSA is undertaken promptly and with sufficient resources.

3.8 Liaison with other organisations

Liaison is an appropriate mechanism for ensuring consistency between enforcers, for sharing good practice, for sharing information and for informing other enforcers of potential difficult situations.

The main liaison arrangements in place and regularly used are as follows:-

- Food Standards Agency
- Directors of Public Protection Wales Food Safety Expert Panel; Communicable Disease Expert Panel; Wales Heads of Trading Standards Food Panel; Food and Agriculture Panel
- Directors of Public Protection Wales Regional Liaison Group, the Glamorgan Group Food Panel, the all Wales Feed Group; Food and Agriculture Group; South West Wales and South East Wales Food Safety Task Groups, South West Wales Communicable Disease Task Group, Welsh Food Microbiological Forum, Wales Food Hygiene Rating Scheme Implementation Group.
- Liaison with professional bodies such as the Chartered Institute of Environmental Health, the Royal Society of Health, the Royal Institute of Public Health and Hygiene, the Chartered Institute of Trading Standards; Public Health Wales, Care Standards Inspectorate for Wales.
- Office for Product Safety and Standards
- Advisory groups, e.g. Food Hygiene Focus Group.
- Liaison with other Council services such as Business Rates, Planning and Building Control to inspect and review applications, Procurement and Schools Service;
- Liaison with the PH Wales Environment Sub Group and the Infection Control Committee and the Cardiff Health Alliance;
- Maritime and Coastguard Agency and stakeholders at the port including port operators;
- Directors of Public Protection Wales Port Health Expert Panel;
- Association of Port Health Authorities and the Ports Liaison Network;
- Welsh Government;
- Local Government Data Unit
- Cardiff International Airport and stakeholders at the airport including UK Border Force, airline operators, baggage handlers
- Public Health Wales including Consultants in Communicable Disease Control, microbiologists, laboratories at Llandough, Princess of Wales, Singleton and the Heath Hospitals
- Local Health Boards
- Animal and Plant Health Agency
- Centre for Radiation and Chemical & Environmental Hazards
- Crown and Magistrates Courts
- Public analyst laboratories, Minton Treharne and Davies, Cross Hands and Cardiff

3.9 Food and Feed Safety Promotion

Shared Regulatory Services is committed to promoting a positive food safety culture through a variety of channels. Promotion of food and feed safety will generally involve:-

- Provision of advice and information to businesses and members of the public through inspections, complaints and notifications;
- Provision of Food Hygiene training courses at both Level 2 and 3;
- Delivery of Food Safety Management and Safer Food Better Business training ;
- Provision of training courses in other languages based on local need;
- Leaflets covering food and feed issues;
- Participation in national events such as Food Safety Week;
- Promotion of Food Hygiene Rating Scheme;
- Guidance to assist businesses;
- Advice through Shared Regulatory Services website and other social media;
- Targeted education, advice and seminars.
- Where possible interventions and promotional activities are evaluated to learn how they can be improved for next time.
- Healthy Options Awards

4. Resources

4.1 Financial allocation

The estimated financial expenditure on food and feed safety for 2018/19 is demonstrated in the following table. Legal charges are part of a central recharge and cannot be separately calculated. Investment in and renewal of information technology assets is funded centrally following a bid process based on the development of a business case.

	Budget 2016/17	Budget 2017/18	Budget 2018/19			Total
	Bridgend Cardiff Vale of Glamorgan	Bridgend Cardiff Vale of Glamorgan	Bridgend	Cardiff	Vale of Glamorgan	
Staffing	3,111,493	3,103,230	734,018	1,803,277	658,944	3,196,240
Travel / Subsistence	44,040	63,710	14,563	33,233	13,074	60,870
Sampling	142,970	87,050	22,452	44,563	20,155	87,170
Supplies and services	221,939	216,870	32,569	99,414	29,238	161,221

TOTALS	3,520,442 This figure relates to the entirety of the teams involved in food. This figure does not reflect the allocation to food only.	3,470,860 This figure relates to the entirety of the teams involved in food. This figure does not reflect the allocation to food only.	803,602	1,980,487	721,411	3,505,501 This figure relates to the entirety of the teams involved in food. This figure does not reflect the allocation to food only.
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NB – Income streams exist within the Service which offset some of the expenditure on food and feed safety. These include the delivery of training, paid for advice and Primary Authority partnerships. Additional income is also provided through fees payable for re-scores and grants provided for promotional work.

4.2 Staffing allocation

The table below summarises the estimated staff demand identified for the core functions within the Food and Feed Service. Staff numbers are shown in terms of full time equivalent posts (FTE).

Function	Bridgend		Cardiff		Vale		Total [FTE]
	Food Safety	Food Stds	Food Safety	Food Stds	Food Safety	Food Stds	
Premises Interventions	5.5	0.4	13.5	1.1	5.5	0.4	26.4
Food & Feed Hygiene Complaints	0.75	0.01	1.9	0.1	0.75	0.01	3.52
Home/Primary Authority	0.15	0.1	0.5	0.5	0.15	0.1	1.5
Advice to Business	0.5	0.1	1	0.4	0.5	0.1	2.6
Food and Feed Sampling	0.40	0.65	0.9	1.15	0.40	0.65	4.15
Food Poisoning	0.2	0	1	0	0.2	0	1.4
Food and Feed Safety Incidents	0.15	0.05	0.47	0.55	0.15	0.05	1.42
Liaison	0.08	0.03	0.27	0.05	0.08	0.03	0.54
Food & Feed Safety/ Standards Promotion	0.2	0.01	0.9	0.05	0.2	0.01	1.37
Management	0.72	0.22	1.55	0.44	0.72	0.22	3.87
Total Professional	8.65	1.57	21.99	4.34	8.65	1.57	46.77
Administration	2	0.18	4.25	0.35	2	0.18	
Overall totals [FTE]	10.65	1.75	26.24	4.69	10.65	1.75	55.73

The tables below indicate the actual number of staff working on Food and Feed safety and related matters (in terms of full time equivalents FTE). The total across Food and Feed Standards is 43.145FTE. Levels of qualification are expressed with reference to the appropriate Food Safety Act Food Law Code of Practice and Practice Guidance and Feed Law Code of Practice, including support staff.

Successful delivery of the service plan is dependent on adequate staffing resources being maintained during the plan period. To deliver the full programme in accordance with the FSA requirements would require additional resource over the existing budget. These additional resources are highlighted beneath the following current resource tables.

Food Safety			
Position	Function	Qualification	FTE

			Bridgend	Cardiff	Vale
Head of Shared Regulatory Services	Management of Environmental Health, Trading Standards and Licensing functions	Trading Standards Officer	0.02	0.06	0.02
OM Commercial Services	Includes management of public protection functions - food hygiene, port health and food poisoning and Trading Standards	Diploma in Trading Standards (DTS)	0.075	0.15	0.075
OM Enterprise & Specialist Services	Includes management of Industry Team which includes Food Hygiene, Food Standards and Feed Hygiene functions; and also the Environment Team (Feed Hygiene)	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.02	0.04	0.02
Team Manager (Food and Port Health)	Food safety management and liaison.	Environmental Health Officer (EHORB registered, competent to inspect all categories)	0.46	1.00	0.46
Team Manager (Health & Safety and Communicable Disease Team)	Community Health including food poisoning and liaison	Environmental Health Officer(EHORB registered)	0.05	0.1	0.05
Team Manager (Industry)	Management of Industry Team which includes Food Hygiene and Food Standards functions at Manufacturing Premises	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.1	0.2	0.1
Commercial Services Officers (Food and Port Health)	Food safety inc. 2 FTE for Port Health	Environmental Health Officer	3.575	8.84	3.575
Commercial Services Officers (CD)	Community health (food poisoning and infection control)	Degrees in in Environmental Health or equivalent science	0.1	0.50	0.2
Commercial Services Officer (Industry)	Food Safety & Food Standards at Manufacturing/Industrial Premises including EH Approvals	Environmental Health Officers & Trading Standards Officers	0.75	1.5	0.75
Sampling Officer (Food)	Sampling	Advanced Certificate in Food Hygiene	0.25	0.5	0.25
Technical Officer (Food and Port Health)	Food safety and port health	Degrees in in Environmental Health or equivalent science	2.4	5.8	2.4
Technical Officer (CD)	Community health including food poisoning	Degrees in in Environmental Health or equivalent science	0.1	0.80	0.2
Commercial Services Officer (Business Engagement and	Food Safety & Food Standards at Manufacturing/Industrial	Ordinary & Higher Certificates in Food Premises inspection,	0.25	0.5	0.25

Training) industry	I Premises	Higher Certificate in Food Control			
		Total Professional staff	8.15	19.99	8.15
Administrative support			1.75	3.75	1.75
		Totals			
		Overall Total (FTEs)	36.29		

There is an estimated shortfall of 3 FTE's needed to deliver the full Food Safety programme in accordance with the Food Law code of Practice and participate in all surveys with other local authorities.

Food Standards					
Position	Function	Qualification	FTE		
			Bridgend	Cardiff	Vale
OM Commercial Services	Includes management of public protection functions - food hygiene, port health and food poisoning and Trading Standards	Diploma in Trading Standards (DTS),	0.05	0.1	0.05
OM Enterprise & Specialist Services	Includes management of Industry Team which includes Food Hygiene, Food Standards and Feed Hygiene functions; and also the Environment Team (Feed Hygiene)	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.02	0.04	0.02
Team Manager (Trading Standards)	Management of Commercial Services Trading Standards Team includes Food Standards and Feed Hygiene functions.	Diploma in Consumer and Trading Standards	0.05	0.2	0.05
Team Manager (Industry)	Management of Industry Team which includes Food Hygiene and Food Standards functions at Manufacturing Premises	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.1	0.1	0.1
Commercial Services Officers (Trading Standards)	Food standards and feed hygiene functions.	Diploma in Trading Standards (DTS) or Diploma in Consumer and Trading Standards (DCATS).		1.6	0.8
Commercial Services	Food Safety & Food	Environmental Health	0.25	0.5	0.25

Officer (Industry)	Standards at Manufacturing/Industrial Premises including EH Approvals	Officers & Trading Standards Officers			
Technical Officer (Trading Standards)	Food standards and feed hygiene functions	DCATS Food and Agriculture module or equivalent.	0.8	0.8	
		Total Professional FTE	1.27	3.34	1.27
Administrative support	.		0.02	0.02	0.02
		Overall total	1.29	3.36	1.29
		Overall Total (FTEs)	5.94		

There is shortfall of officers to meet the Food Standards inspection programme in accordance with the Food Law Code of Practice based on the same number of premises for Food Standards and Food Safety. It is recognised however, that such an increase in the number of Officer's required within this area is not financially viable for the service and consequently for 2018/19 Officers enforcing Food Safety will be provided with training enabling them to enforce Food Standards legislation thus embracing a multi skilled approach to the enforcement of food. In relation to high risk premises for the purpose of Food Standards, enforcement will remain with the Trading Standards teams. This would result in an estimated shortfall of 2 FTE's needed to deliver the full Food Standards programme in accordance with the Food Law code of Practice and participate in all surveys with other local authorities.

Feed Hygiene					
Position	Function	Qualification	FTE		
			Bridgend	Cardiff	Vale
OM Enterprise & Specialist Services	Includes management of Industry Team which includes Food Hygiene, Food Standards and Feed Hygiene functions; and also the Environment Team (Feed Hygiene)	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.01	0.02	0.01
Team Manager (Trading Standards)	Management of Commercial Services Trading Standards Team includes Food Standards and Feed Hygiene functions.	Diploma in Consumer and Trading Standards	0.0025	0.015	0.0025
Team Manager (Industry)	Management of Industry Team which includes Food Hygiene and Food Standards functions at Manufacturing Premises	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.01	0.01	0.01
Commercial Services Officers (Trading Standards)	Food standards and feed hygiene functions.	Diploma in Trading Standards (DTS) or Diploma in Consumer and Trading Standards (DCATS).	0.025	0.05	0.025
Team Manager (Environment)	Management of Animal Health and Welfare	BSc,	0.05	0.05	0.05

	Team				
Commercial Services Officer (Industry)	Food Safety & Food Standards at Manufacturing/Industrial Premises including EH Approvals	Environmental Health Officers & Trading Standards Officers	0.05	0.05	0.05
Sampling Officer (Food)	Sampling	Advanced Certificate in Food Hygiene	0	0	0
Technical Officer (Trading Standards)	Food standards and feed hygiene functions	DCATS Food and Agriculture module or equivalent.	0	0	0
Animal Health & Welfare Officer	Feed hygiene on farm including sampling	Competency achieved through training, monitoring and assessment (officer to complete CoC in Agriculture 2017).	0.05	0.10	0.05
Animal Health & Welfare Officers	Feed hygiene on farm including sampling	Competency achieved through training, monitoring and assessment	0.10	0.025	0.10
		Total Professional FTE	0.2975	0.32	0.2975
Administrative support included with food hygiene					
		Totals			
		Overall Total (FTEs)	0.915		

There is no shortfall of Officers to meet the Feed Hygiene programme.

4.3 Staff Development Plan

The creation and development of the new Shared Regulatory Service across three distinct areas, together with the implementation of a new structure and new ways of working presents many challenges for the new Service and its workforce.

Shared Regulatory Service’s approach to managing this is through the production of a Workforce Development Plan that provides a plan for developing the workforce to ensure the workforce has and maintains the right mix of experience, knowledge and skills required to fulfil our goals.

The Workforce Development Plan, will provide a framework that addresses wide ranging issues and bring together the following areas:-

- Developing organisational culture
- Leadership and management development
- Skills development
- Recruitment, retention and progression
- Communication and employee engagement
- Employee performance management

Continuing Professional Development (CPD) is actively encouraged and officers attend a wide range of training courses, seminars, meetings and briefings to help maintain competency and improve technical, legal and administrative knowledge. The new Food Law Code of Practice requires a minimum of 20 hours CPD to be completed by all authorised officers. The Chartered

Institute of Environmental Health and the Chartered Trading Standards Institute have mechanisms in place to monitor CPD of its members requiring 20 hours a year to be met for normal membership and 30 hours a year for chartered membership.

Regular food safety and standards training is carried out in house. At least one internal training session will take place each year.

All officers receive training in respect of new food and feed legislation and how it relates to establishments involved in the supply of products of animal and non animal origin. This is an ongoing process and officers will receive further training and guidance as required.

The Service also recognises the need for full technical support to be available to all Food and Feed Officers and this is achieved through a variety of ways, including internet subscription and library.

5. Quality Assessment

Shared Regulatory Services recognises the need to measure the effectiveness of its food and feed safety duties and strongly supports the ethos of continuous improvement. The Service therefore participates and undertakes a number of activities to ensure that work is of a high standard and opportunities to identify and implement improvements are taken.

Documented procedures

To ensure the quality and consistency of our activities, processes, procedures and work instructions for Food and Feed enforcement activities are documented within each local authority area. To ensure the quality and consistency of our activities and in accordance with the Food Standards Agency Framework Agreement, consistent procedures have been developed to harmonise the processes, and work across Shared Regulatory Services and are available to all Shared Regulatory Services staff.

Documented procedures identify responsibility for the work carried out and ensure that all changes identified through audit are carried out in accordance with improvement procedures. .

Assessment and audits

The monitoring of the quality of our policies and procedures is assessed in a number of ways, namely:-

- Internal audit of documented procedures and work instructions via internal audit;
- Audits undertaken by the Food Standards Agency.
- Customer consultation and feedback;
- Review of corporate complaints and compliments about the service.

Shared Regulatory Services is committed to continuous improvement using various management tools for identifying opportunities for improvement and has used 'lean management' techniques to review processes and procedures which require the mapping out and examination of processes to identify more efficient and effective working practices.

In March 2017 an Audit was completed by the Food Standards Agency Wales of the delivery of official food controls in Shared Regulatory Services. This identified recommendations for incorporation into the Service to ensure best practise. A copy of the report is available at Appendix F. An Action Plan will be drafted with set timescales to ensure that these improvements are made.

Customer consultation and feedback

We are committed to involving customers in the continuous improvement of services and recognise the need to have structured methods of obtaining service users views and perception of the service. The service sends a questionnaire to all food business operators in Cardiff following each planned food hygiene inspection visit asking a series of questions to gauge the business's satisfaction with the services they received and the impact the inspection has had on the business.

6. Review

6.1 Review against the Service Plan

It is the policy of Shared Regulatory Services to review performance against the Service Plan on an annual basis, supported with regular monitoring of performance measures to ensure continuous improvement throughout the year. Shared Regulatory Services has an effective performance management infrastructure in place for developing, delivering, monitoring and reviewing interventions which is undertaken through the following mechanisms:-

- The Joint Committee for the Shared Regulatory Service will approve this Service Plan setting out the work programme for the service and reviewing performance against the previous year's programme.
- Performance of the service is considered at team and divisional meetings on a monthly basis. Performance against strategic and local Performance Indicators is reviewed through a framework of management review meetings.
- Section and Divisional meetings allow for the effective management of work and are also one of the routes of communication that allow individual and team involvement in the development and delivery of interventions.
- Performance of individuals is managed through the #itsaboutme Scheme detailed in Section 4.
- Procedures and work instructions will be managed through a Shared Regulatory Service document control system.

6.1.1 Review of Food Hygiene Interventions 2017/18

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work and performance. The following sections identify those planned interventions due at the beginning of

2017/18 for Food Hygiene and reports on the delivery of those interventions together with information on enforcement activities.

The following table shows the proposed number of interventions, together with those that were actually undertaken and the overall % achievement. It should be noted that the programme changes throughout the year as businesses close and new businesses open. The percentage achieved therefore relates to performance at the end of the year as the programme has developed.

Food Hygiene Intervention Plan 2017/18										
Risk Category		Number of Interventions due at start of year (including any backlog)								
		Bridgend			Cardiff			Vale of Glamorgan		
		Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	% programme achieved at end of year
HIGH RISK	A	6	10	100%	60	57	100%	5	9	100%
	B	71	66	100%	216	198	100%	75	67	100%
	C	368	318	100%	876	750	100%	288	236	100%
	High Risk Total	445	394	100%	1122	1005	100%	372	312	100%
MEDIUM-LOW RISK	D	57	47	100%	165	123	100%	67	57	100%
	E/AES*	232	154	98.70%	544	392	98.72%	206	125	100%
	Medium to low Risk Total	289	201	99%	709	515	99%	273	182	100%
NEW BUSINESSES	Unrated (New business at 1 April)	13	195	100%	63	556	98.11%	17	178	99.44%
	Unrated (New business identified during year)	Est 194			Est 416			Est 140		
	Total unrated	207	195	100%	479	556	99.11%	157	178	99.44%
REVISIT	Re-visits	See note 1 below	28	N/A	See note 1 below	348	N/A	See note 1 below	42	N/A
TOTALS		941 exc. re-visits	818 inc. re-visits		2340 exc. re-visits	2424 inc. re-visits		798 exc. re-visits	714 inc. re-visits	

Note 1 – The number of re-visits due was not identified in the 2017/18 Intervention Plan, however the table above, does highlight those that were actually carried out during the year.

High Risk Food Business (A – C Rated)

2017/18 has seen the best results achieved by SRS in relation to the number of inspections carried out at high risk food premises. 100% of inspections were achieved across all three areas compared to 87.66% Bridgend, 96.30% Cardiff and 94.22% in the Vale of Glamorgan during

2016/17. This amounted to 1711 programmed interventions. This was significant achievement for the service given that previous performance has not matched this.

The term high risk premises includes those businesses rated as:-

- category A (those premises requiring a visit every six months)
- category B (those premises requiring an annual visit)
- category C (those premises requiring a visit every 18 months)

D and E rated food businesses

The inspection of low risk businesses (rated D-E) saw a dramatic increase with an overall intervention rate of 100% in the Vale of Glamorgan and 99% in Bridgend and Cardiff was achieved for Category D and E premises. These results were a significant improvement from the previous years (83.56% in Bridgend, 70.36% in Cardiff and 83.05% in the Vale of Glamorgan) with 100% of D rated interventions being carried out across the 3 areas. The shortfall relates to E rated premises where 2 interventions in Bridgend, and 5 in Cardiff remained outstanding at the end of the year.

Inspection of New Businesses

As many as one in three UK businesses fail in the first three years. Establishing contact with new businesses in their first year of trading is an important part of the SRS strategy to promote and support the local economy. Early engagement with a business helps us to protect the public health and allows the SRS to work with food businesses and provide them with the opportunity to understand legal requirements.

Cardiff has a high turnover of business ownership which presents a challenge for the service, over and above the routine inspection programme. During 2017/18 a total of 935 new premises were identified across the region, with 561 of these being in Cardiff representing a massive 60% of new businesses across the three areas. In Bridgend 195 new premises were identified and 179 in the Vale of Glamorgan. Notwithstanding this, the service achieved significantly improved results in relation to the inspection of new businesses with 100% in Bridgend being inspected, 99.11% in Cardiff and 99.44% in the Vale of Glamorgan. Attaining target was also confounded by businesses not opening at initial date intended.

Food Hygiene Revisits

Inspection of food businesses often requires follow up visits to ensure compliance with food safety requirements. The intervention and revisit procedure requires that all businesses rated 0 are revisited within 28 days and all those rated 1 or 2 are revisited within 3 months. The estimated number of re-visits was not identified in the 2017/18 intervention plan, however 28 were undertaken in Bridgend, 348 in Cardiff and 42 in the Vale of Glamorgan.

Broadly Compliant Premises

The percentage of food premises which were deemed to be broadly compliant with food hygiene law i.e. rated a 3 or above, continued to stay at a high level for all 3 areas with 96.69% in Bridgend, 92.71% in Cardiff and 95.40% in the Vale of Glamorgan. Cardiff fell slightly below the target of 93% but still evidenced improvement on the previous year. This may be due to the fact that all D rated businesses were inspected within Cardiff, many of which had been overdue for sometime and at which a fall in standards was noted.

These good results nevertheless reflect the positive impact of the implementation of the Food Hygiene Rating Scheme which encourages many businesses to strive for a better rating.

In land Imported foods

During the inspection of food businesses, officers consider the origin of imported foods. Any indications that food may not have been subject to correct import controls are investigated and, where necessary, the food is removed from the food chain. No further enforcement action was necessary in respect of in-land imported foods.

Food Safety Projects

In addition to routine inspections of food businesses, SRS participated in a number of planned food safety surveys which entail various sampling programmes across a range of businesses. These included:-

Ice Used in Cold drinks in Coffee Shops Survey - Following a BBC investigation into ice from coffee shops which were found to contain bacteria that posed significant food safety risks, 46 businesses (7 Bridgend, 32 Cardiff and 7 in the Vale of Glamorgan) were sampled for ice in accordance with the Welsh Microbiological Food Forum's protocol. Of these 14% in Bridgend, 40% Cardiff and 0% in the Vale were found to be satisfactory. Overall 32.68% of the samples taken were found to require further action across the areas to secure satisfactory results. Issues identified as contributing to poor results were mainly related to inadequate cleaning and maintenance procedures of the ice machine, poor personal hygiene practices and inadequate storage of ice scoops.

School Meal Survey – SRS participated in the Welsh Food Microbiological Forum Survey to establish the baseline levels of selected organisms in the foods provided by schools to children across Wales. This resulted in 173 samples of ready to eat foods being taken from 37 schools including private schools. These included 10 schools in Bridgend, 10 in Cardiff and 17 in the Vale of Glamorgan. Overall 96.5% of the results were satisfactory with only 3.5% requiring further investigation.

FHRS Sticker Survey – The Food Hygiene Rating (Wales) Act 2013 establishes a mandatory food hygiene rating scheme for Wales. The scheme is designed to help customers make informed choices as to where to purchase or eat food by providing information about the hygiene standards. Food businesses (unless exempt) have a legal duty to display a valid FHRS sticker. A survey was completed across SRS to ensure compliance with this law. 947 businesses in the main towns throughout the County Borough Bridgend, City of Cardiff and Vale of Glamorgan were checked to verify the valid rating sticker was being displayed in a conspicuous place. 18 businesses were found not to comply with the law and were served a fixed penalty notice.

In addition to planned surveys, the SRS also participated in a:-

Less than thoroughly cooked burger survey – Burgers can be contaminated with food poisoning bacteria such as E.coli O157 and therefore in order to be served safely have to be thoroughly cooked unless strict food safety procedures are in place and they are sourced from approved suppliers. Currently only one burger chain in Cardiff is able to serve less than thoroughly cooked burgers. A survey was carried out to assess if burgers served in Cardiff were being thoroughly

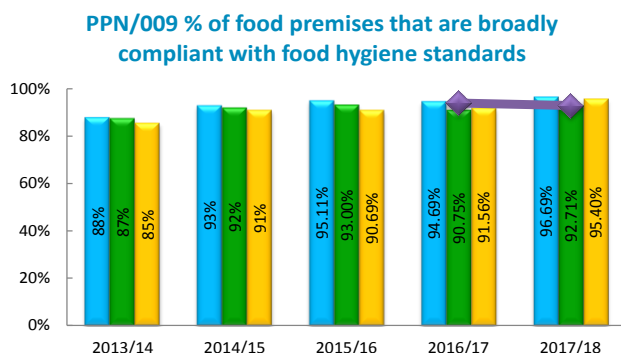
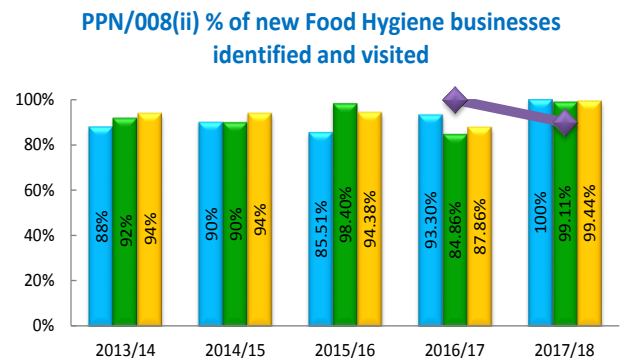
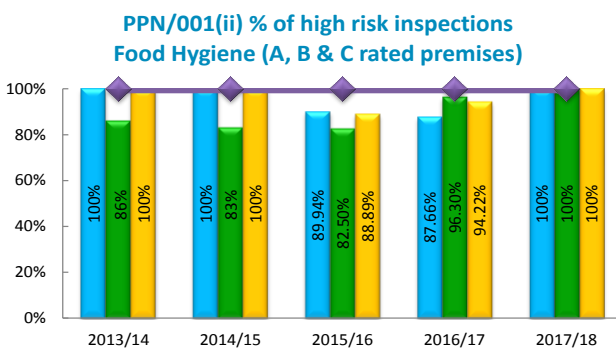
cooked. 9 businesses were visited and 18 burgers test purchased and analysed by the Public Analyst. Analysis of the samples revealed 9 out of the 18 were undercooked This resulted in appropriate enforcement action being taken to ensure that in future businesses thoroughly cooked their burgers, including the service of 4 Remedial Action Notices.

Managing E.coli risk within the Council - The partner councils all have a role in procuring and providing food to a range of establishments. Over the last three years, significant progress has been made to address the E.coli risk at Cardiff Council. In 2013/14 Cardiff Council adopted a Corporate Food Safety Management System, supported by an E- learning module. A corporate Action Plan is in place and the E-learning module has been significant in allowing a greater numbers of relevant employees to be trained and this has been reflected positively in the Action Plan. The Shared Regulatory Service recognises the need to maintain this momentum to implement and develop these corporate procedures and as such will continue to support this regime in 2018/19. The impact upon the overall compliance of the Council establishments at Cardiff has been significant and in 2018/19 the Shared Service will discuss extending this regime to the other partner councils. Supporting these “in-house” regimes is not a core function of the Shared Service and any work undertaken will need funding from the partner Councils. Whilst other communication regimes are currently in place for both Bridgend and the Vale of Glamorgan the aforementioned formal approach would be best practice for all three authorities.

Performance Measures

The only current Public Accountability Measure relevant to Food Safety is PAM/023 (formerly PPN009), however other performance indicators such as service improvement data are collected. The following graphs show the results for the last 5 years.

■ Bridgend ■ Cardiff ■ Vale of Glamorgan



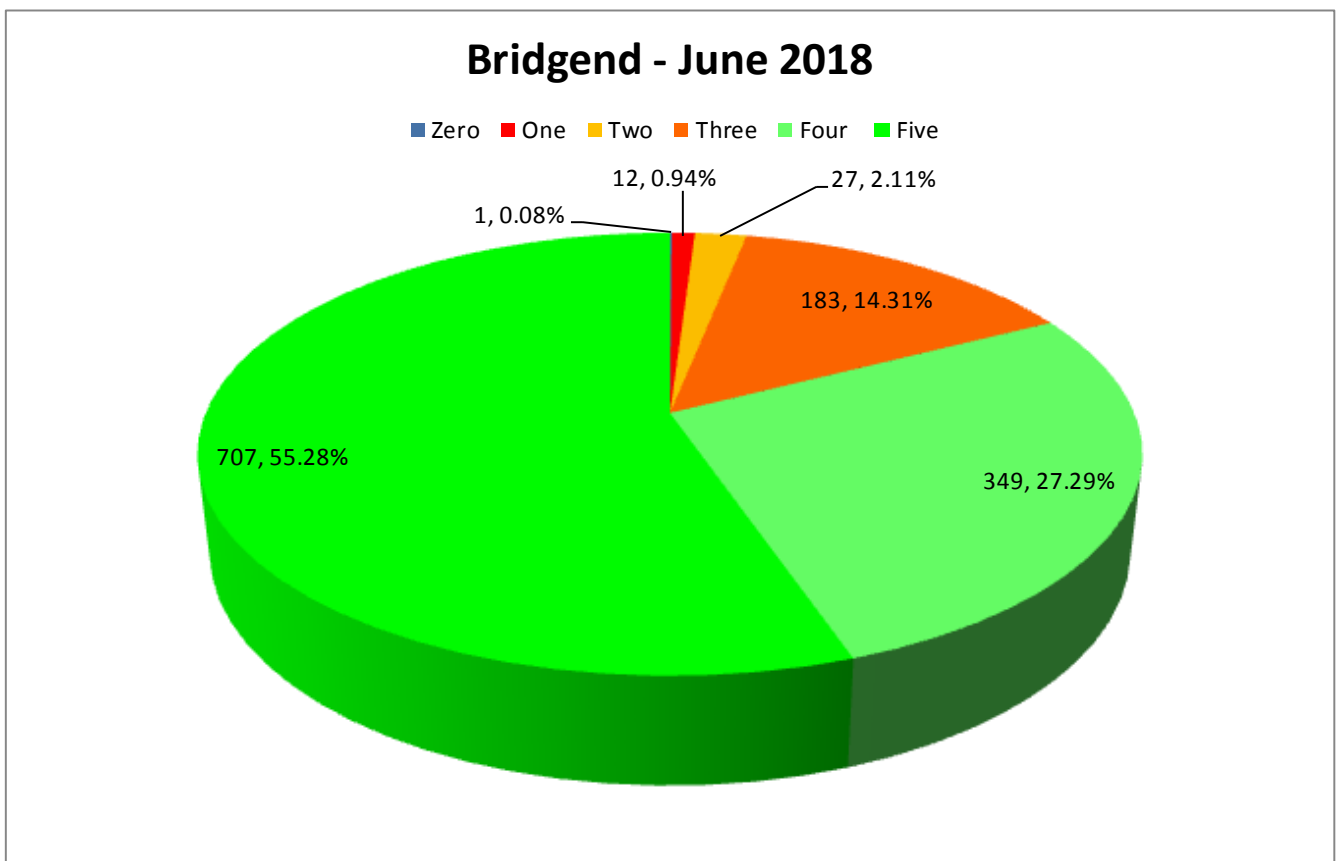
The broadly compliant figure indicates the number of businesses who have managed to achieve a food hygiene rating of 3 or above. Whilst SRS endeavours to improve compliance through advice, guidance or enforcement, ultimately the score achieved depends

on the willingness of the food business operator to make and maintain improvements.

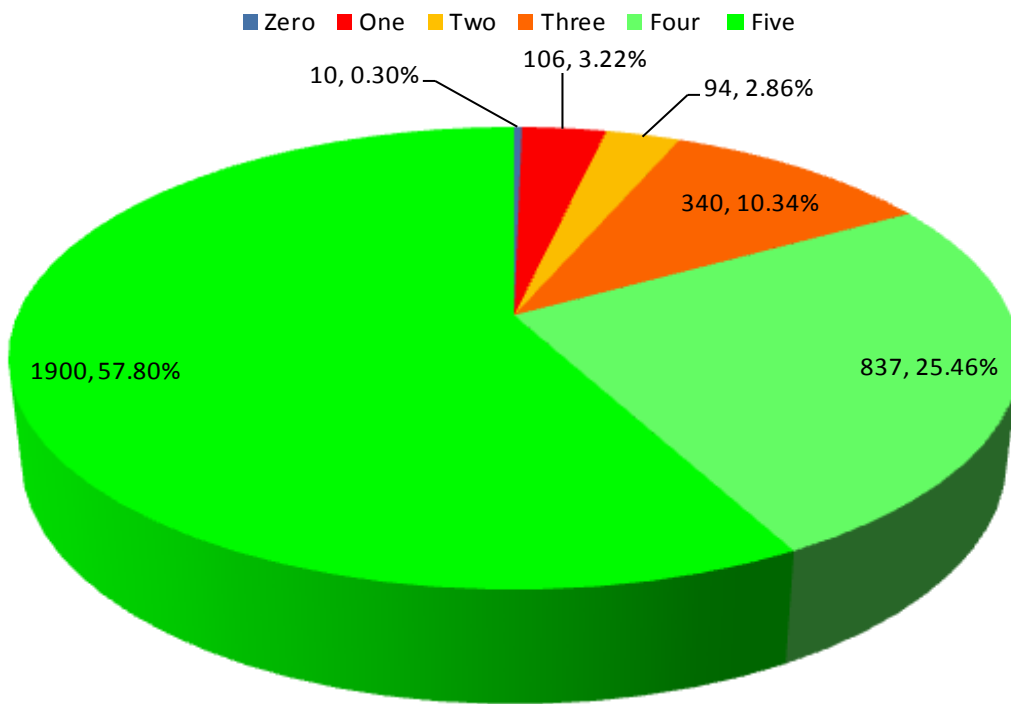
Increase in businesses that are broadly compliant - the number of food businesses with a food hygiene rating of more than 3 increased in each authority area during 2017/18 from the previous year. (Bridgend from 94.69% to 96.69%, Cardiff 90.75% to 92.71 %, Vale of Glamorgan 91.56% to 95.40%). This can be attributed to the success of the intervention programme for food businesses and ensuring that any food safety issues identified are followed up by appropriate enforcement and revisits to ensure compliance with food safety law.

The FHRS was introduced in October 2010. As premises are inspected they received a hygiene rating. In November 2013 a statutory scheme was introduced throughout Wales.

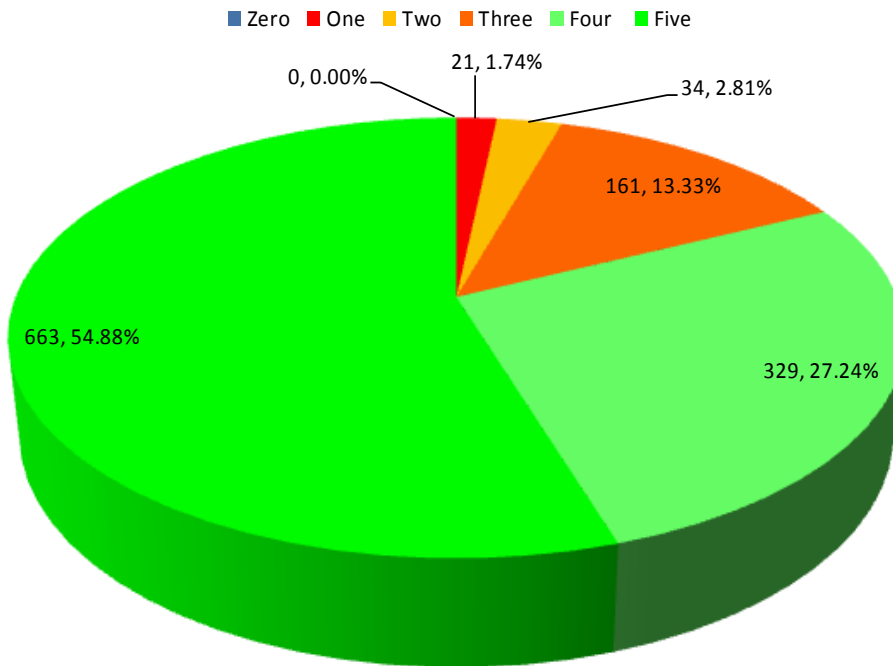
The following charts highlight the number of premises inspected across the region together with their rating. A breakdown of the scores across Bridgend, Cardiff and Vale of Glamorgan can be found below.



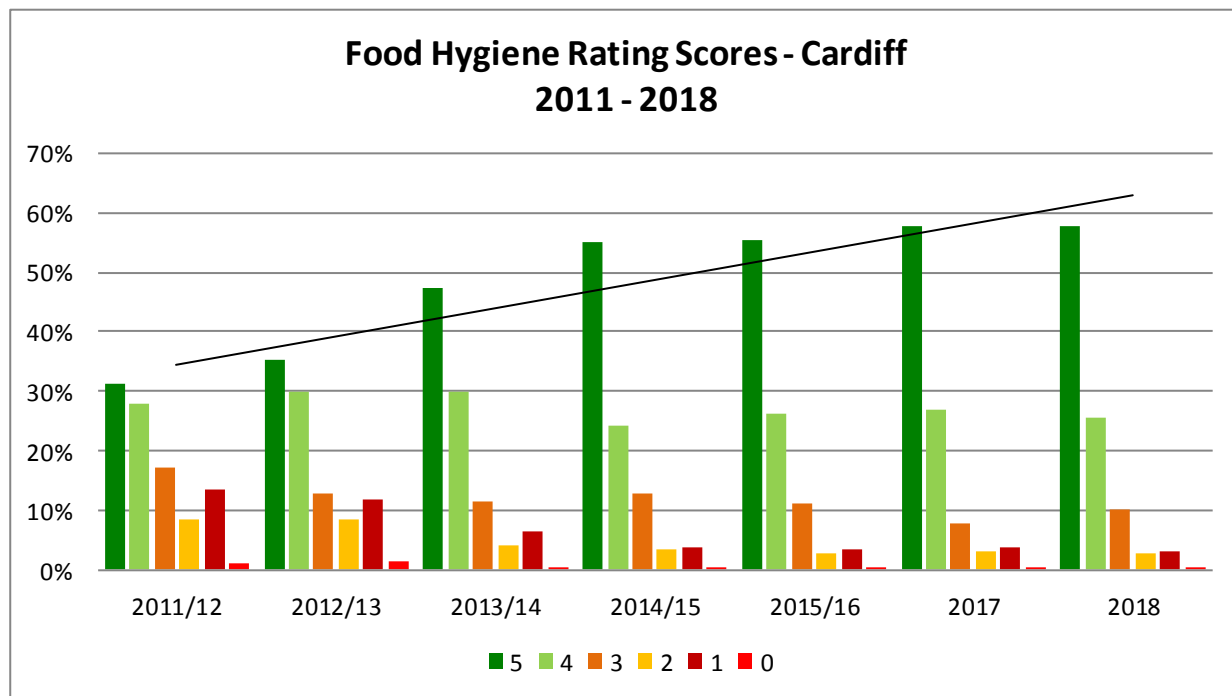
Cardiff - June 2018



Vale of Glam - June 2018



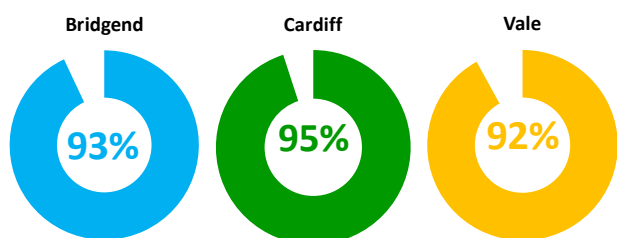
The Scheme has had a positive impact in improving standards in food businesses and the following graph demonstrates how over a 7 year period the percentage of Cardiff businesses that have been granted a '5' rating, the highest rating that can be achieved, has increased. Similarly the number of low scoring businesses has dropped.



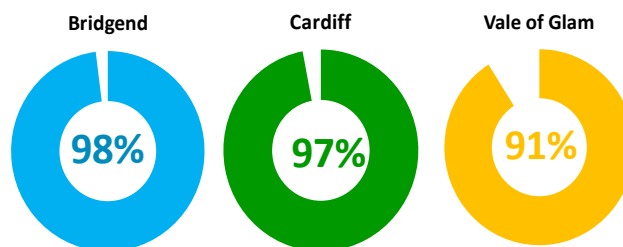
Customer Satisfaction

During 2017/18 questionnaires were sent to food business customers following an inspection to gauge their views on the inspection process across the 3 areas. A flavour of the results received can be found below and suggest that SRS are having a positive impact on food businesses and that customers are satisfied with our services.

Businesses who felt food safety inspection helped them improve food hygiene standards in their business



% of food businesses satisfied with overall level of service



Prosecutions and enforcement action

Cardiff Restaurant fined £3,200 for a string of food hygiene offences - A Cardiff Restaurant was fined £3,200, ordered to pay costs of £1,660 and a victim surcharge of £40 for a number of food hygiene offences following intervention by officers from Shared Regulatory Services. Visits were made to the business in November 2016 and in May 2017 to find that the restaurant didn't have a

food safety management system in place and pest control measures were ineffective. Despite the advice given, the business continued to fail.

Cockroach found in a poppadum at Indian Restaurant – Following a complaint from a customer that part of a cockroach was found in a poppadum, SRS officers visited another Cardiff restaurant and discovered cockroaches on the wall and floor as well as an open drain in the kitchen, presenting a significant risk of contamination of food. Legal proceedings were instigated which resulted in the owner being sentenced to four months in prison for each offence to serve concurrently, suspended for two years; ordered to carry out 200 hours of unpaid work in the community; ordered to pay £200 compensation; £1250 in costs with £115 in surcharges.

In addition to legal proceedings, the following enforcement actions were undertaken:-

Food Hygiene Enforcement Actions 2017/18			
Type	Bridgend	Cardiff	Vale of Glam
Voluntary closure	0	41	3
Seizure, detention and surrender of food	1	5	0
Suspension/revocation of approval or licence	0	0	0
Emergency Prohibition Notice (Formal)	0	0	1
Prohibition Order	0	0	1
Simple caution	0	1	0
(Hygiene)Improvement notice	3	11	4
Remedial action and detention notices	5	12	2
Written Warnings	664	1706	558
Prosecutions concluded	0	2	0

6.1.2 Review of Food Standards Interventions 2017/18

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work. The following sections identify those planned interventions due at the beginning of 2017/18 for Food Standards and reports on the delivery of those interventions together with information on enforcement activities.

The following table shows the proposed number of interventions, together with those that were actually undertaken and the overall % achievement. The number of interventions due fluctuates during the year as premises close and new businesses open. The % achievement therefore represents those that were due and which were carried out throughout the year, rather than against those that were due at the beginning of the year.

Food Standards Intervention Plan 2017/18

Risk Category	Number of Interventions due at start of year (including any backlog)								
	Bridgend			Cardiff			Vale of Glamorgan		
	Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	% programme achieved at end of year
High Risk	8	0	100%	36	24	100%	1	0	100%
Medium - Low Risk	See note 1 below	162	N/A	See note 1 below	332	N/A	See note 1 below	141	N/A
New Business	See note 2 below	173	90.58%	See note 2 below	430	74.27%	See note 2 below	176	96.70%
Re-visits	See note 3 below	4	N/A	See note 3 below	20	N/A	See note 3 below	4	N/A
Total	8 High risk only	339		36 High risk only	806		1 High risk only	321	

Note 1 - Currently the service is resourced to only deliver an inspection programme for high risk and new businesses only, however medium and low risk inspections are picked up via surveys, complaints and by using Food Safety Inspection Forms throughout the year which ensures that many such premises are inspected. The figures above show the actual number carried out during 2017/18.

Note 2 – The number of new businesses due an intervention was not identified in the 2017/18 Intervention Plan however the table shows the actual number of new businesses where an intervention was carried out together with the % of the programme completed at the end of the year.

Note 3 – The number of re-visits likely to be carried out during the year was not identified in the 2017/18 intervention plan, however the table above shows the actual number of re-visits carried out during the year.

High risk interventions

During 2017/18 an overall high risk inspection rate of 100% was achieved across Bridgend, Cardiff and the Vale of Glamorgan against a target of 100%. This result was a significant improvement on the previous year's results (Bridgend, 96.96% Cardiff, 66.66% Vale of Glamorgan and 11.11%).

Medium and low risk interventions

Currently the service is resourced to only deliver an inspection programme for high risk and new businesses only, however, medium and low risk inspections are picked up via surveys, complaints and by using Food Safety Inspection Forms. As a result of this, no target was set at the beginning of the year, however through this method of intervention, the service undertook 162 interventions in medium and low risk interventions in Bridgend, 332 in Cardiff and 141 in the Vale of Glamorgan.

New Business

Early engagement with a business helps us to protect the public health and allows the SRS to work with food businesses and provide them with the opportunity to understand often complex legal requirements.

The number of new businesses due an intervention was not identified in the 2017/18 Intervention Plan however a target of 80% was assigned through the SRS performance framework. Results for 2017/18 show that this target was achieved in both Bridgend and the Vale of Glamorgan with 90.58% food standards interventions carried out in Bridgend and 96.70% in Vale of Glamorgan. The result for Cardiff was 74.27%. Cardiff has a high turnover of business ownership which presents a challenge for the service, over and above the routine inspection programme. During 2017/18 a total of 952 new premises were identified across the region for food standards, with 579 of these being in Cardiff representing over 60% of new businesses across the three areas. In Bridgend 191 new premises were identified and 182 in the Vale of Glamorgan.

The Food Law Code of Practice requires new businesses to be inspected within 28 days, which can become challenging due to food businesses often registering with the service but not ready to trade within the 28 days.

Re-visits

The number of re-visits estimated to be carried out during the year was not identified in the 2017/18 intervention plan, however the actual number of re-visits carried out during the year amounted to 4 in Bridgend and Vale of Glamorgan and 20 in Cardiff.

Food Standards Projects

In addition to the high risk inspection programme, SRS carried out a wide variety food standards surveys resulting in 157 informal and formal samples being taken in relation to meat content, allergens in foreign labels, previously frozen chicken, raw and exotic fruit and vegetables, allergens in Chinese takeaways, banned colours, allergens and meat speciation in takeaways and goat meat. Of these 51 were unsatisfactory all of which are or will be subject to enforcement action.

Chinese Takeaway Survey - In one particular survey, test purchases were undertaken on 10 Chinese takeaway premises chosen at random across the SRS region where officers requested special fried rice containing no egg due to allergies. Upon testing by the Public Analyst it was confirmed that every meal contained egg and/or egg protein, suggesting cross contamination. Following the exercise all premises were re-visited and given full and comprehensive advice regarding the dangers of serving meals to customers who declare an allergen. In May 2017, all these businesses were re-visited and again officers requested special fried rice containing no egg due to an allergy. Of those visited, 2 premises stated they were unable to guarantee that the dishes would be egg free, so no samples were taken, however the remaining 8 premises did sell a product declared as egg free, of which all of them failed the formal sampling. Following investigations two premises received Simple Cautions and four premises were prosecuted

Operation OPSON - Operation OPSON is a global initiative jointly coordinated by Europol-INTERPOL focusing on counterfeit and substandard food, and the organized crime networks behind this illicit trade. In the UK activities are co-ordinated by the National Food Crime Unit (NFCU) and the Food Standards Agency (FSA). As a result of activity by enforcement authorities during OPSON VI, concerns were raised over the safety implications of certain ingredients found in food supplements such as:

DNP in Fat-burning and Slimming Pills – 2,4 Dinitrophenol (DNP) is an industrial chemical that is not fit for human consumption. When consumed, DNP can be extremely dangerous to human

health, and can even lead to coma or death. “Fat-burner” products containing DNP appear to be marketed at those looking to lose weight, as well as those in the bodybuilding community. Food supplements containing DNP are deemed as unfit for human consumption.

DMAA in Supplements – 1,3 Dimethylamylamine (DMAA) is an ingredient often described as a “natural” stimulant. It has many claimed functional uses, including as a body building or a weight loss aid. DMAA use, especially in combination with other ingredients such as caffeine, can elevate blood pressure and lead to cardiovascular problems, and has also been linked with stroke and death. Products containing DMAA are classified as unlicensed medicines in the UK, are therefore not considered a food.

Following on from OPSON VI Shared Regulatory Services carried out a further survey in 2018 purchasing food supplements from on line sellers and gyms across the three Local Authorities submitting them for testing for the presence of DNP and DMAA. During the survey 8 samples were submitted and three samples were found to contain DMAA. Further investigations are on going with regard to these failures and formal action may follow.

During the same time period officers also took part in OPSON VII investigating the extent to which protein powders may be adulterated with other potentially cheaper products. There is known to be a problem with protein powders being adulterated with carbohydrates. The advertised protein content on the labels has in some cases been found to be much higher than the results received following analysis by Public Analysts. Ten samples were submitted by SRS and a compositional analysis was done on all of the samples submitted. The results were then compared with the declared protein content levels on the labels. Whilst all of the samples were satisfactory in terms of the declared protein other issues were identified concerning the labelling and traceability of the products. These are currently being followed up by officers.

Prosecutions and enforcement action

Cardiff Off Licence fined for selling out of date food – Following a complaint from an individual a visit was made to an Off Licence in Cardiff where it was discovered food being offered for sale past its use by date and one incident of unfit food for sale. The time lapse of some of these food items ranged from 8 days to 45 days, with the potential to harm consumers. The company was fined £9000 and the individual fined £1000 together with costs being awarded and compensation for the complainant.

The following enforcement actions were undertaken in respect of food standards.

Food Standards Enforcement Actions 2017/18			
Type	Bridgend	Cardiff	Vale of Glam
Voluntary closure	0	0	0
Seizure, detention and surrender of food	0	0	0
Suspension/revocation of approval or licence	0	0	0
Emergency Prohibition Notice (Formal)	0	0	0
Prohibition Order	0	0	0
Simple caution	0	0	0
Improvement notice	0	0	0
Written Warnings	7	59	9
Prosecutions concluded	0	1	0

6.1.3 Review of Feed Safety Interventions 2017/18

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work. The following sections identify those planned interventions due at the beginning of 2017/18 for Feed Safety and reports on the delivery of those interventions together with information on enforcement activities.

The following table shows the proposed number of interventions, together with those that were actually undertaken.

Feed Safety Intervention Plan 2017/18								
	Number of Interventions due at Start of Year (Including any Backlog)							
	Bridgend		Cardiff		Vale of Glamorgan		Total	
	Due	Actual	Due	Actual	Due	Actual	Due	Actual
Manufacturer								1
Co-product Producer		2	4	7		2	4	11
Mobile Mixer					1		1	0
Importers								0
Stores								0
Distributor				2	1		1	2
Transporter					1		1	
On-farm mixer					6	5	6	0
On-farm mixer Annex II								5
Pet food manufacturer				1				1
Supplier of surplus food	2	5	16	17	1	2	19	24
Livestock Farms	29	18		1	29	20	58	39
Arable Farms			7				7	2
Ceased trading								12
Total	31		27		39		97	97

The table above shows that 97 inspections were planned, and 97 completed. There were a number of variations to the plan as follows:--

Type	Reason for variation
Manufacturer	Complaint visit identified new premises which was inspected
Co-product Producer	Of the 7 additional inspections 6 were new premises, and the other additional premises was inspected to complete FSA Inspection Programme.
Mobile Mixer	No mobile mixers registered in SRS area.
Distributor	New feed premises registered and was initially inspected as A1 premise
Transporter	Transporter was in process of gaining Earned Recognition. Decision made to defer inspection to 18/19.
On-farm mixer	One farm no longer undertaking R11 activities of on farm mixing. Premise

	recorded on Tascomi
On-farm mixer Annex II	Farms inspected no longer undertaking on farm mixing and thus recoded on Tascomi to correct registration code
Pet Food manufacturer	New business registered and initial inspection undertaken
Supplier of surplus food	New Iceland premises registered for feed, which required initial inspections
Livestock Farms	Although the table indicates 39 inspections were undertaken, the actual number of visits completed was 49. This was due to 10 of these premises type, having ceased trading. 9 inspections were not completed due to workloads of team.
Arable Farms	Error in proposed allocation for arable farms. Initially 3 proposed from FSA. 2 were completed, final inspection not completed due to workloads.

High risk businesses

The number of high risk interventions due at the beginning of 2017/18 was not identified in the Intervention Plan for that year, however a target of 100% was assigned through the SRS performance framework. During 2017/18, an overall high risk inspection rate of 100% was achieved across Bridgend, Cardiff and the Vale of Glamorgan against a target of 100%.

New business

The estimated number of new businesses due an intervention at the beginning of 2017/18 was not identified in the Intervention Plan for that year, however a target of 80% was assigned through the SRS performance framework. The Service failed to meet that target achieving 50% in Bridgend and Cardiff and 33.33% in the Vale of Glamorgan. The number of new feed businesses is relatively small and the number outstanding relates to 8 premises.

Re-visits

The estimated number of re-visits due at the beginning of 2017/18 was not identified in the Intervention Plan for that year, however only one premises required a revisit, following a referral from the FSA and identification of a number of non compliances identified on the initial inspection by the officer.

The lead investigating officer revisited 3 times, and these revisits were recharged to the FSA on an hourly basis, with a total of 7 hours claimed. This relates to a labelling issue and use of unauthorised additives on a feed product.

Feed Safety Projects

No feed projects were undertaken due to no funding being available and limited resources within the team to undertake additional proactive project work

Prosecutions and enforcement action

No prosecution or enforcements were undertaken during 2017/18.

The following enforcement actions were undertaken in respect of food standards.

Feed Safety Enforcement Actions 2017/18			
Type	Bridgend	Cardiff	Vale of Glam
Voluntary closure	0	0	0
Seizure, detention and surrender of feed	0	0	0
Suspension/revocation of approval or licence	0	0	0
Emergency Prohibition Notice (Formal)	0	0	0
Prohibition Order	0	0	0
Simple caution	0	0	0
(Hygiene)Improvement notice	0	0	0
Written Warnings	0	0	0
Prosecutions concluded	0	0	0
Remedial Action Notices	0	0	0

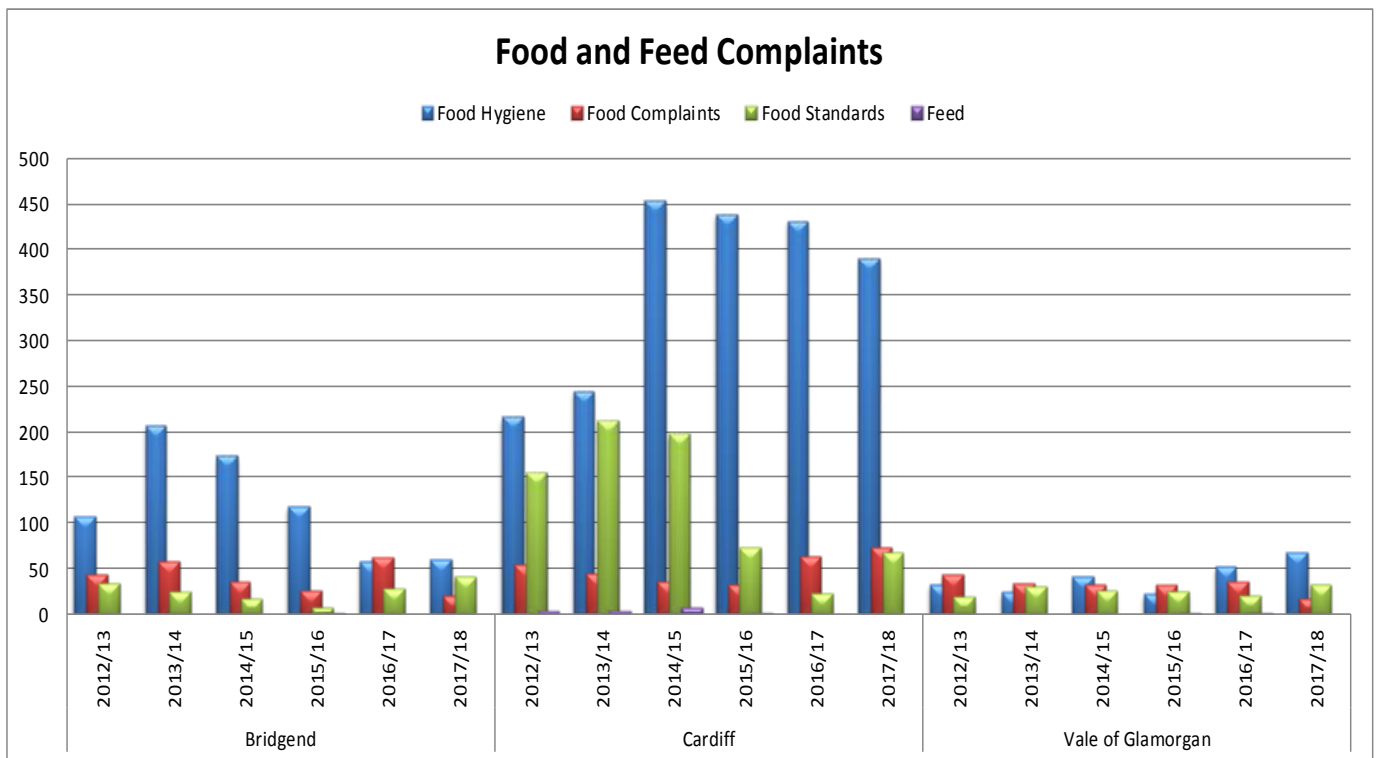
6.1.4 Complaints

Based on the requests received during the previous year, it was estimated that the service would receive 775 service requests during 2017/18, however the actual number was 766 (Bridgend 120, Cardiff 530 And Vale 116). The table below provides a breakdown of the estimated number and the number actually received and investigated.

Complaint type	Bridgend		Cardiff		Vale of Glamorgan	
	Estimate	Actual	Estimate	Actual	Estimate	Actual
Food Hygiene	57	59	431	390	52	67
Food Complaints	62	20	64	73	35	17
Food Standards	28	41	23	67	20	32
Feed Safety	1		1		1	
Total		120		530		116

The following graphs shows a breakdown of the complaints received over the last 6 years by type. It can be seen that Cardiff receives significantly more complaints than both Bridgend and the Vale of Glamorgan, more than double of the two areas. This is to be expected due to the large number of businesses in Cardiff.

The number of complaints received regarding Animal Feed is very low. Last year only one complaint was received as a result of a referral from the FSA. The nature of the complaint related to labelling and unauthorised additives in a marketed feed.



6.1.5 Home Authority Principle and Primary Authority

SRS now has some 24 Primary Authority partnerships in place with both local and national businesses and is able to charge for the work done as part of these arrangements on the basis of full cost recovery. Of those Partnerships, and despite the new regulatory scope approach within the changes to Primary Authority, eighteen are more likely to request or be given advice and support from a Food or Feed perspective:

- BBI Healthcare
- Bravura Foods
- Brutons the Bakers
- Cardiff Sports Nutrition
- Filco Supermarkets
- Global Foods
- Just Perfect Catering
- Royal Voluntary Service
- Sloan Home
- Vale Hotel & Resort
- Vydex Corporation
- Wild Water Group

Devolved Welsh Partnerships:

- Hallmark Care Homes
- HC-One Care Homes
- Sainsbury's
- Tesco
- Waitrose
- Wyevale Garden Centres

6.1.6 Advice to business

During 2017/18 Shared Regulatory Services has assisted businesses providing food and feed safety advice through a variety of channels, such as:-

- **Advice provided as part of the inspection process** – The service continues to provide food and feed safety advice as part of the inspection process, receiving the comments such as those below in relation to food safety inspections.

“The officer introduced himself in a very professional manner, was very clear and concise about what was required from his visit. We all certainly learned a lot that will come a long way to improve our food business”.

“The inspector I had was extremely helpful in all matters current and going forward, professionalism first class, also very patient with my long list of questions”.

“Informative and professional visit. The officer was helpful and I'm confident in the support provided from both her and also the SRS as a service”.

- **Responding to complaints and requests for service** – See 6.1.4 above.
- **Twice yearly food newsletter** - The Service's commitment to advising and supporting food businesses to achieve legal compliance and the highest possible standards continues with our twice yearly newsletter 'Food and Safety News', aimed at food businesses to inform, educate and advise on responsible food safety and health and safety across Bridgend, Cardiff and the Vale of Glamorgan.
- **Provision of information leaflets** - The service provides guidance leaflets for new businesses that are starting out, home caterers, childminders, nurseries, event catering and also good practice hygiene guide for lower risk premises. There is also an event organisers guide to ensure that all food safety matters are considered during the planning of an event.

During 2017/18 SRS received a Food Standards Agency (FSA) grant bid of £8,000 to improve food safety knowledge and awareness within the SRS region. Food Safety guidance and advice documents were updated as part of the bid to help food businesses comply with the law. The FSA has fed back that some of these documents are used by some other Local Authorities within Wales which demonstrates the value of the guidance.

Furthermore, the service signposts businesses to information available from the Food Standards Agency, and utilises FSA guidance where appropriate.

- **Promotion and participation in national events, such as Food Safety Week** – SRS started tweeting in September 2017 and included food tweets in relation to the Christmas Turkey campaign promoting tips on safely preparing turkey at Christmas.
- **Participation in working groups, such as Events Liaison Panel** – In order to ensure proper co-ordination with all partner agencies in preparation for the smooth



running of major events, the Service is part of the Events Liaison Panel at Cardiff Council and the Events Safety Advisory Groups at both Bridgend and the Vale of Glamorgan. Having the capital city based within the SRS region and the coastline, there are lots of large events that are that attracted to the area such a the Champions League Final and the Eisteddfod as well as long standing events such as the Vale Show, Bridgend Show and Cardiff Food Festival amongst many others. SRS had interaction or involvement in over 50 events during the course of 2017/18 and is set to be more in 2018/19.

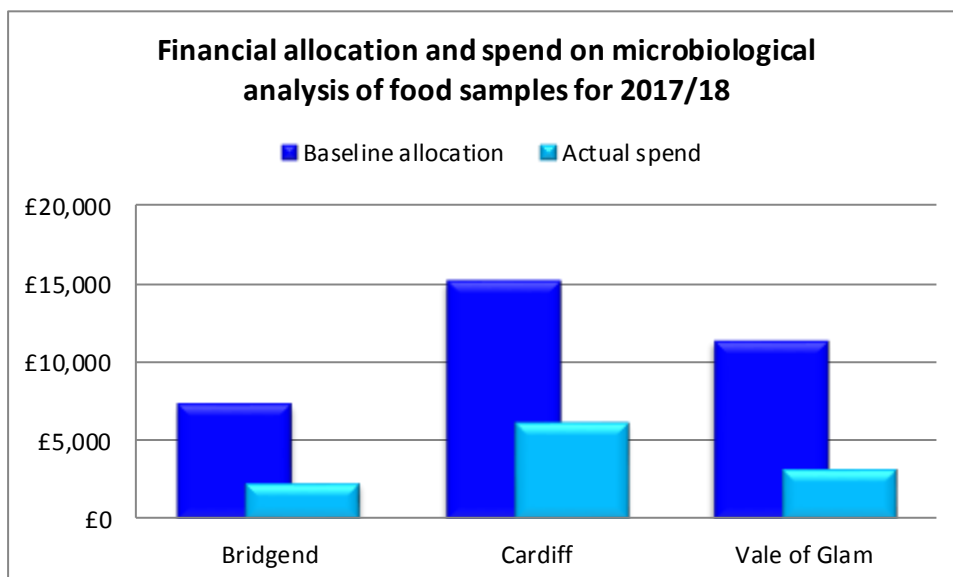
- **Advice through Shared Regulatory Services website** – A wide range of information is available on the SRS Website which is continually reviewed and updated.
- **Food Business Forums** – Whilst a Food Safety Event was held in early 2017, no further events were undertaken during the last financial year. SRS are however looking to host another Food Safety Event in 2018/19 building on the success of the first one held in the Principality Stadium. These Events gives SRS an opportunity to engage with Food Businesses and provide training on new legislation, topical issues or guidance to improve Food Safety compliance.
- **Practical targeted training** – SRS offers training in Level 2 and 3 Food Safety Courses and Health and Safety with a HACCP course currently being developed. During 2017/18 124 individuals were trained with 100% of delegates in Bridgend and the Vale of Glamorgan and 99% in Cardiff indicating that the training they received will help them improve standards of compliance in their business.

As part of the FSA bid SRS also provided Safer Food Better Business seminars and Food Safety Management (HACCP) training to 50 businesses within the SRS Region. Feedback from these courses has been very positive with 100% of HACCP trainees and 96% of Safer Food Better Business trainees feeding back that the training they received will improve standards of compliance in their business.

- **Paid for food hygiene advice visits available to all applicable food businesses** - Shared Regulatory Services offers a paid for advice service to businesses. A fee of £102 +VAT is charged for a 2 hours on site advice visit tailored to the businesses needs with a follow up written report. During 2017/18, 52 fee paid advice visits plus one Food Standards visit was undertaken.

6.1.7 Food and Feed Sampling

In 2017/18 574 samples were collected and submitted to Public Health Wales for analysis. (139 Bridgend, 271 Cardiff and 164 Vale of Glamorgan



During 2017/18, Bridgend received an allocation of £7,306, Cardiff £15,092 and Vale of Glamorgan £11,359 for the microbiological analysis of food and water samples from Public Health Wales. Unfortunately last year the Service was unable to utilise the available budget for sampling due to the relevant staff having unforeseen injuries which necessitated the realignment of duties for a period of five months.

The majority of informal food samples taken for surveillance and monitoring purposes will be assessed using the criteria contained in the “Guidelines for Assessing the Microbiological Safety of Ready-to-Eat Foods Placed on the Market”, revised HPA Guidance 2010 and Microbiological Criteria for Foodstuffs (EC Regulation 2073/2005). Most of these samples will be of an informal nature but the provisions of the Food Law Code of Practice will be followed when formal samples are required e.g. where a prosecution could result.

Food Hygiene

For 2017/18 the sampling programme for participation in local and national surveys was subject to significant change from its original targets as can be seen below. The absence of a sampling officer for several weeks in the beginning of the year resulted in the non-participation in the cooked chicken survey.

Furthermore the lack of suitable media in the laboratories for the analysis of the samples taken for the school meal survey resulted in a decrease in the intended number of samples for the survey and additional samples being taken for the shopping basket survey. Difficulties were also encountered in the School Meal Survey due to the the fact that there was often limited additional food to sample from compared to that which was required to be provided. Steps were taken to try to resolve this by requesting Catering Services to prepare additional food in advance of sampling.

There was a small reduction in the number of businesses sampled from for the ice survey This was as a result of additional resources required to determine that remedial steps at businesses which had poor sample results had been effective by resampling.

Survey	Target	Achievement
Welsh School Meal Survey	350 samples	173 samples
Ice survey	50 businesses	46 businesses
Cooked chicken survey	30 samples	0 samples
Shopping basket	40 samples	98 samples

Furthermore the planned sampling of Approved Premises - (15 – 4 Bridgend, 10 Cardiff, 1 Vale) was not undertaken due to the training and availability of the sampling officer during the year.

Food Standards

In relation to Food Standards, SRS carried out a wide variety of surveys during 2017/18 some of which were provided to the Glamorgan Group results. These included.

Meat Content - 13 samples taken - 5 Unsatisfactory – premises advised regarding the non compliances and will be retested.

Allergens in foreign labels - 10 samples taken - 10 samples unsatisfactory – traders advised – to be followed up at GG level due to high non compliance

Previously frozen chicken - 6 samples taken - 6 satisfactory results

Raw and Exotic fruit and veg - 10 samples taken - 3 unsatisfactory due to labelling issues

Allergens in Chinese takeaways - 10 samples taken - 9 failures

Re sampled formally - 9 samples - 6 failures - 6 prosecutions

Takeaways – banned colours, allergens and meat speciation -26 samples submitted - 12 samples for meat speciation – all satisfactory. 6 allergens – all satisfactory. 14 non permitted colours. Enforcement action taken at 7 premises

Goat Meat - 6 samples taken - 4 failed samples – subject to further investigation

A further 23 informal samples have been submitted and 11 formal samples. All the unsatisfactory results are subject to enforcement action.

Whilst a large number of samples were taken during 2017/18, there were a small number of planned sampling programmes that were not completed or were varied slightly. These include:-

- **Testing of single fruit for pesticide** - The fruit tested in this survey was selected from retailers because no suitable 'Pick your own' premises were identified in the SRS area with suitable produce to test
- **Craft ales for alcohol content, sulphur dioxide and gluten** - This survey was not carried out due to the high number of failures in other areas of work that required follow up sampling and investigation work
- **Previously frozen turkeys** - This survey was not carried out due to a previous frozen chicken survey, the results of which did not support the need to continue with this survey as there were no failures

- **The compositional standard of Olive oil/ Extra Virgin Oils** - This survey was not carried out due to the high number of failures in other areas of work that required follow up sampling and investigation work

Feed Safety

The following feed sampling was agreed with the FSA and completed in full as follows:

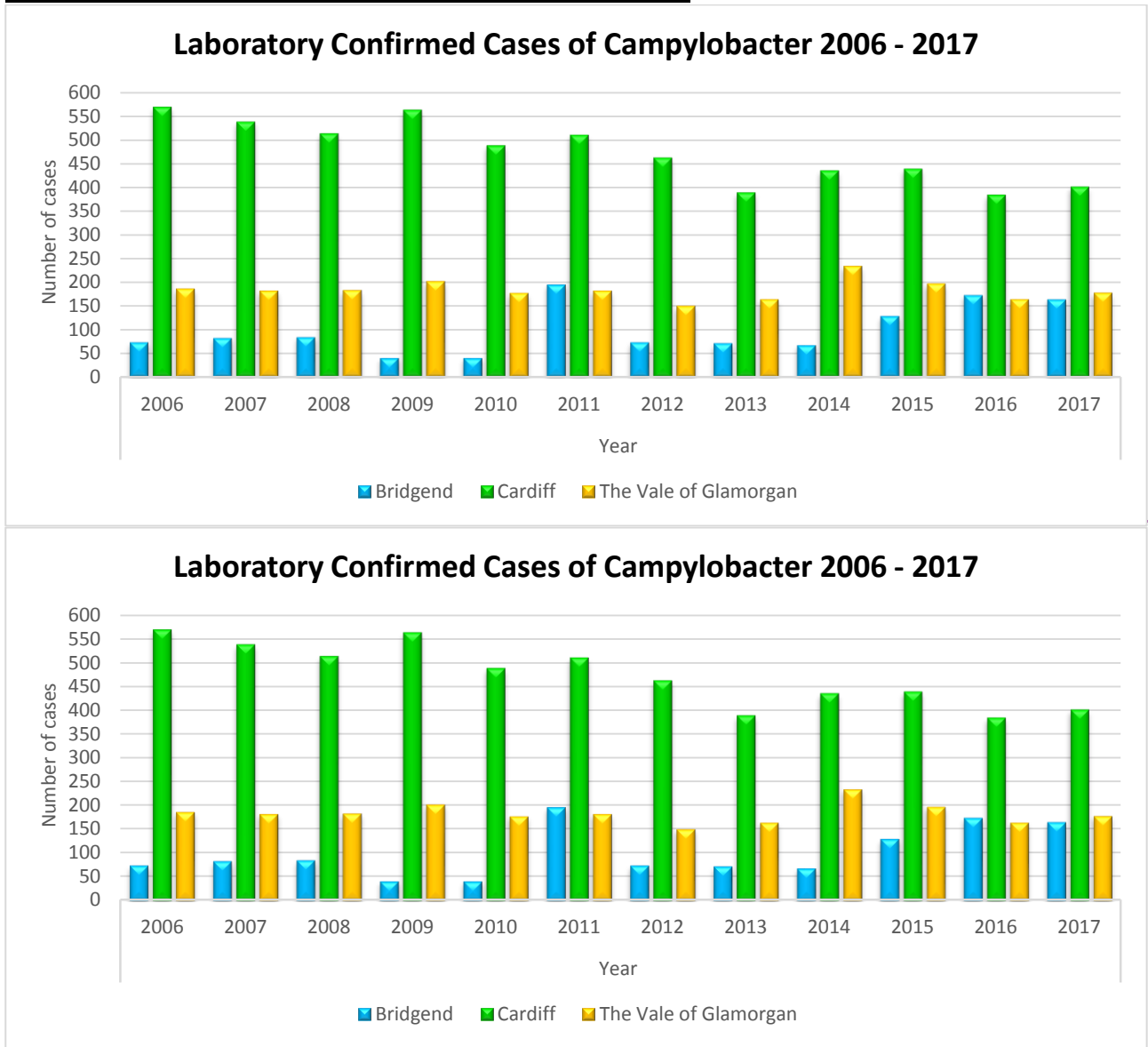
Points of Entry	NUMBER OF SAMPLES	COST OF ANALYSIS (£)
Annex II		
Heavy Metals	1	840
Dioxins and dioxin like PCBs		
Mycotoxins	4	1584
Unauthorised GM		
Coccidiostats		
Labelling		
Annex I and III		
Heavy Metals		
Mycotoxins	2	817

6.1.8 Control and investigation of outbreaks and food related infectious disease

In 2017, SRS was notified of 1,195 cases of food poisoning of which 911 (76%) were laboratory confirmed and 284 (24%) were suspected food poisoning cases. The proportions of confirmed to suspected cases is comparable with 2016 but there has been a decrease in notifications by 105 cases (2016: 1,300 cases of which 987 were laboratory confirmed). In the main suspected cases of food poisoning are members of the public who suspect that they have suffered food poisoning, however the majority of these are viral gastro enteritis most likely to have been acquired through person to person transmission or within the environment. The majority of these cases are observed in the winter months when Norovirus is particularly prevalent within the community.

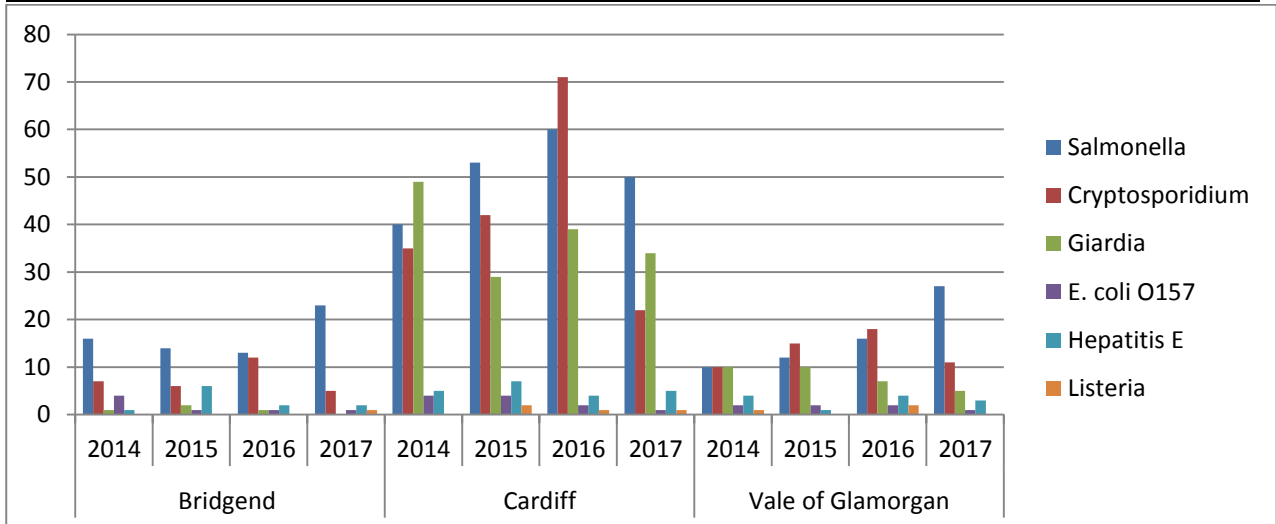
Of the 911 confirmed cases, 502 (55%) occurred in Cardiff, 216 (24%) in the Vale and 193 (21%) in Bridgend. Campylobacter makes up the greatest proportion of confirmed cases; 741 (81%) an increase on 2016 figures: 722, 73%. Of the 741 Campylobacter cases, 400 (54%) in Cardiff, 164 (22%) in Bridgend and 177 (24%) in the Vale (see Graph below). A full report on the risk factors associated with Campylobacter Infection in Bridgend, Cardiff and the Vale of Glamorgan in 2017 can be found in Appendix B of the Communicable Disease and Health Service Plan 2018/19.

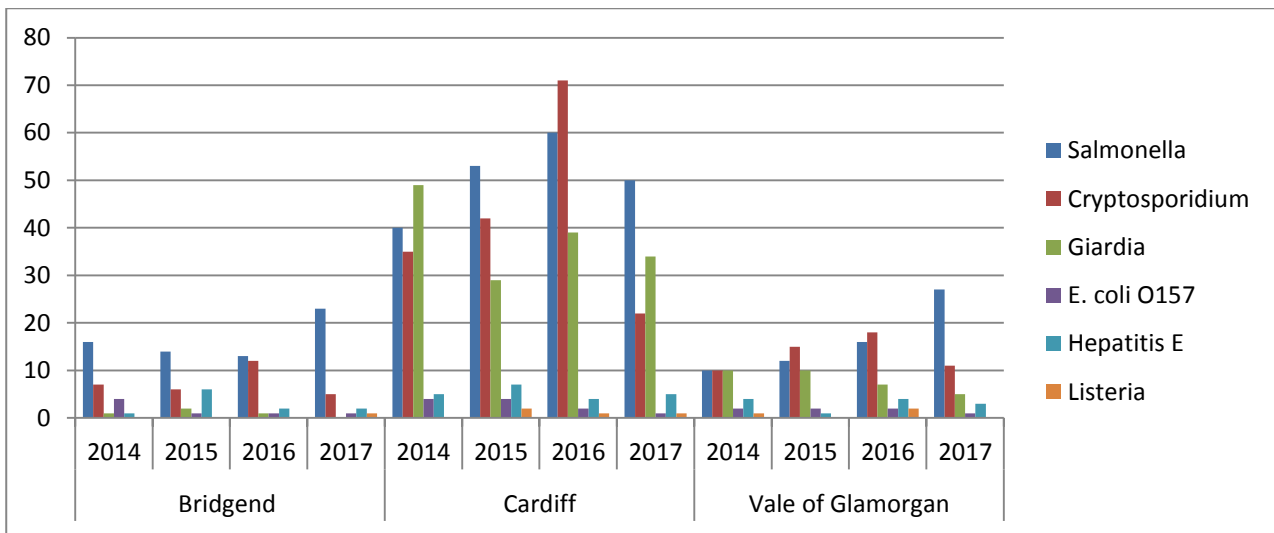
Graph: Reported cases of Campylobacter from 2006 – 2017



The remaining commonly reported confirmed cases of food poisoning are outlined in the graph below.

Graph: Incidence of the common pathogens causing food poisoning in SRS between 2014 – 2017





A notable investigation involved a case of Hepatitis A infection associated with a restaurant in Cardiff where the team worked in partnership with a neighbouring local authority and Public Health Wales to prevent the onward transmission within the community. The case and his son worked in the restaurant and the timely notification assured an efficient investigation and quick contact tracing. Two Incident Management Team meetings were held in 2 days and resulted in blood testing of close family contacts, exclusion of the son from work as a precaution and vaccination of 17 staff members in the restaurant. The investigation team worked closely with the restaurant during this time with full compliance from staff members resulting in no further cases of infection.

Outbreaks

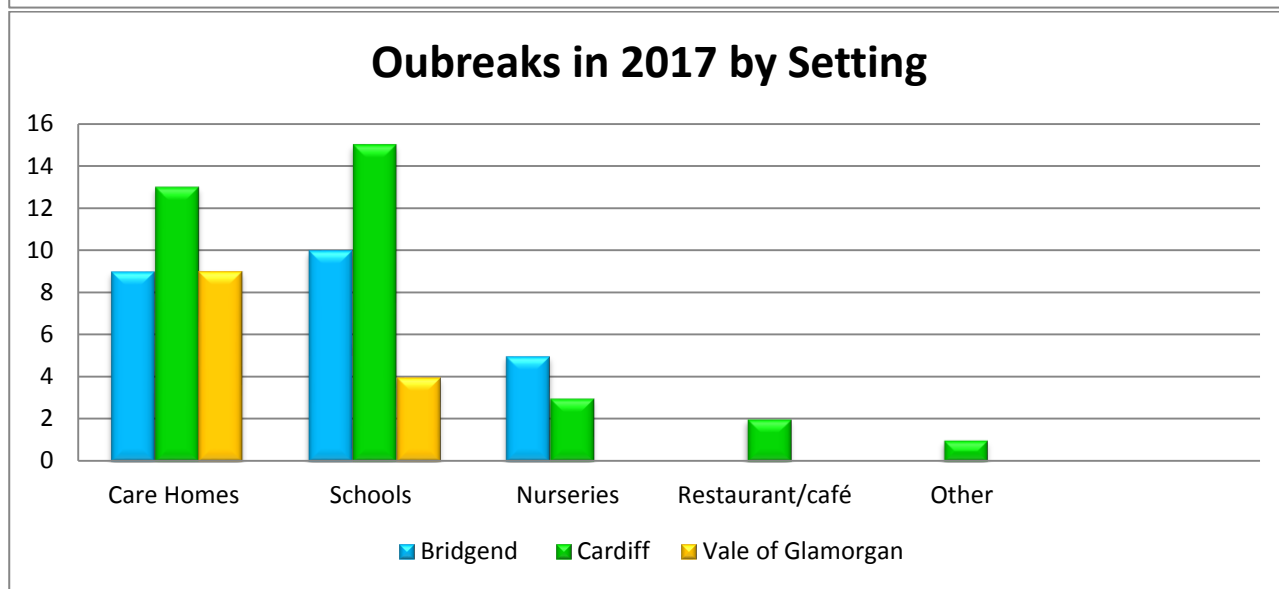
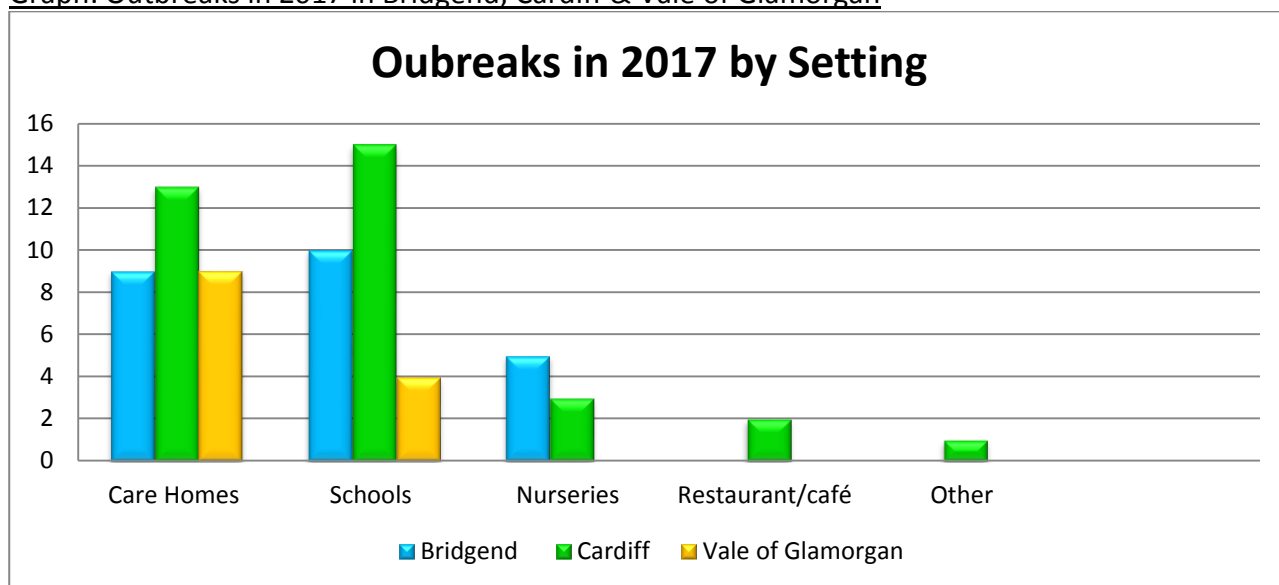
In addition to the on-going investigation of sporadic cases of food poisoning in 2017, a total of 71 outbreaks were identified and investigated by the Communicable Disease Team, of which:

- 24 outbreaks occurred in Bridgend;
- 34 in Cardiff; and
- 13 in the Vale of Glamorgan.

This compares to 79 outbreaks in 2016: 20 outbreaks in Bridgend, 47 in Cardiff and 12 in the Vale of Glamorgan.

The graph below outlines the outbreaks that occurred in Bridgend, Cardiff and the Vale of Glamorgan, by setting during 2017.

Graph: Outbreaks in 2017 in Bridgend, Cardiff & Vale of Glamorgan



Schools make up 41 % and care homes account for 44% of all outbreaks (comparable with 2016 proportions – schools 30, 38% and care home 26, 33%); these outbreaks were associated with confirmed or suspected Norovirus infections. There were no outbreaks associated with foodborne transmission and the 2 outbreaks associated with food businesses (restaurant/café) were thought to be suspected Norovirus as investigations did not identify any common food source. Further information on the control and investigation of outbreaks and food related infectious disease can be found in the Communicable Disease Service Plan 2018/19.

6.1.9 Feed/Food Safety Incidents

There was one Food Alert for Action received from the Food Standards Agency in October 2017. No action was required across SRS.

In addition there was one feed alert last year. The FSA alerted us to a Cardiff business. This alert was based on labelling issues in relation to the sale of complimentary pet feed. This same alert results in the revisits discussed earlier.

6.1.10 Liaison with other organisations

Liaison with other organisations remains a constant theme of the work of SRS. The list at 3.8 represents all those organisations that the service liaised with during 2017/18.

6.1.11 Food and Feed Safety Promotion

Promoting a positive food safety culture is undertaken through a variety of channels, many of which are directly linked to providing advice to business. See 6.1.6 above. In addition, the following activities have also contributed to the Service's commitment to the promotion of food and feed safety during the previous year.

- **Managing the Healthy Options Award** - The Healthy Options Award aims to encourage food businesses to provide healthier options to customers, through the use of healthier catering practices, increasing fruit, vegetables and starchy carbohydrates, as well as decreasing fat, especially saturated fat, sugar and salt. It also recognises provision of healthy options for children, rewards staff training, promotion and marketing of healthier options. Healthy Options Awards were renewed in 11 food business in SRS during 2017/2018 (Cardiff 9; Bridgend 2).

6.2 Identification of any variation from the Service Plan

The mechanisms in place to review performance enable remedial action to be put in place should any shortfalls against targets or plans occur during the year. Consideration will be given to the various factors that may contribute to any shortfalls and whether additional resources, re-allocation of staff resources or re-prioritisation of workload is required to resolve any problems. Any issues that may not have been resolved at the end of the year will be included in the Service Plan for the following year.

Performance against the Food and Feed Law Service Plan 2017/18 has been outlined in detail above. It was recognised at the time of plan adoption that resources were insufficient to deliver the full requirements of the Food Law Code of Practice. Therefore, in light of the reduced resource available, decisions were made regarding priorities which included inspection of all A, B, non-broadly compliant C premises and new business for food hygiene purposes. These premises were the focus of priority throughout the year. As it became clear during the year that performance would be poor for high risk business inspection, contractors were employed to inspect C rated premises in Cardiff. During the year, however, the service received correspondence from the Food Standards Agency requesting that every effort be made to

complete the whole food inspection programme (A-E). As a result of this, the service utilised the assistance received from contractors and offered overtime to the team which resulted in the anticipated number of inspections being exceeded. A further contributory factor to this success was also the successful attainment of qualifications obtained by four officers enabling inspection of food premises. This ability to utilise the four officers for inspection purposes greatly assisted the service in its performance.

Whilst this is an extremely pleasing result for the service; the completion of such a great number of inspections does have consequences for the programme of inspections this year. The impact of completion of inspections to D rated premises particularly in the Cardiff area has resulted in a number of non-compliances identified and further investigation is required in accordance with the Enforcement Policy. Consequently the former D rated premises have subsequently moved into higher risk category based on the findings on inspection.

Historic ways of working demonstrated that the inspection of D and E rated premises were rarely undertaken particularly in the Cardiff area. This was due to concentration of resources on the higher risk premises. Whilst it is agreed this is the best use of resource there is a risk of these category inspections being missed year on year.

In accordance with the requirements of the food law code of practice, E rated premises inspections are able to be completed utilising self assessment questionnaires. This is due to the low risk nature of such premises, examples of which include clothing stores selling confectionary goods such as sweets and chocolates. The purpose of the questionnaire is to determine whether the said low risk food items have further developed and ensure the business would not require re-categorising based on it's practices. The service utilised the business support facility to send the aforementioned questionnaires by post which resulted in a small number of forms returned. In order to ensure receipt of all required information, the service further maximised the use of students from local universities who are studying environmental health and have successfully passed their food safety module. The students therefore visited the associated premises and completed the questionnaire on site with the food business operator.

It was also outlined during the year that the team would have difficulty in achieving the food standards programme set out. This was due to an officer from the Commercial Services section receiving a secondment opportunity elsewhere in the service. Whilst attempts were made to utilise contractors to undertake food standards inspections unfortunately due to lack of availability of contractors this was not possible.

The shortfall of inspections carried out last financial year will impact the required programme for the forthcoming year. The overdue inspections will therefore become priority for inspection before the commencement of the identified programme.

The training of Food Hygiene Officers to undertake food standards inspections will greatly assist the service in completion of medium and low risk food standards premises. The inspection for the purpose of food hygiene matters will be done as a matter of course with the food standards inspection being added to further enhance the inspection. Any further enforcement matters required for the purpose of food standards matters will be referred to the Trading Standards team for action.

6.3 Areas for improvement

As part of the annual review process, any areas for improvement will be identified and included in the Plan and/or the Service Area Business Plan with such improvement encompassing areas such as :-

- Improvements to working practices;
- New projects or initiatives;
- Greater partnership working;
- Improvements in efficiency and effectiveness;
- Promotion of food issues;
- Greater focus on outcomes.

A particular priority is to ensure the completion of the aforementioned Action Plan as a result of the Food Standards Agency Audit. A re-visit and further audit in relation to the action plan is anticipated to take place in 6 months time. The Service requires particular focus to ensure this is a successful outcome.

As a result of a review of the service, the following opportunities for development are identified for 2018/19

Food Safety

- Continue to implement and enforce the statutory Food Hygiene Rating System at all visits carried out by the Food and Port Health Teams and initiate projects to ensure appropriate display of ratings.
- Promote the new requirements of the Food Hygiene Rating (Promotion of food hygiene rating)(Wales) Publicity Regulations 2016 introduced in November 2016.
- Continue to prioritise new businesses and A and B rated businesses for inspection.
- Continue to carry out interventions at C, D and E rated businesses in line with the requirements of the food law code of practice.
- Bid for any grant funding that maybe available in order to improve standards in poorly performing businesses.
- Establish arrangements for engaging with business and communicating food safety messages.
- Maximise the use of the available funding for sampling by developing and implementing a suitable sampling programme.
- Promote the uptake of paid for advice and training by businesses to improve their hygiene ratings.
- In light of the impact of the Shared Regulatory Service on Cardiff Council arrangements for Corporate E.coli management, continue to input into the Council's compliance with E. Coli Action Plan to ensure that the Council maintains working group meetings.
- Engage with local businesses to promote and secure additional Primary Authority relationships.
- Develop and implement a workforce development plan to ensure ability to meet goals and secure resilience of service.

- Implement changes required by FSA Audit.
- Check and ensure accuracy of data on new database.

Food Standards

- Continue to support development of Food Hygiene officers in undertaking food standards inspections in accordance with new working arrangements.
- Continue to ensure all food premises are risk rated in accordance with the Food Law Code of Practice
- Ensure all food qualified officers are kept up to date with changes in legislation via a combination of internal and external training courses and workshops.
- Continue the process of registering feed businesses and share intelligence with other authorities about the types of businesses supplying the feed chain especially those supplying co-products.
- Increase the number of competent level one feed officers within the service to help deal with the increasing number of feed businesses.
- Encourage officers to become food and/or feed qualified
- Ensure database is up to date and accurate.

Feed Hygiene

- Work with the Wales Feed Group to standardise policies and procedures.
- Ensure all feed officers are kept up to date with changes in legislation through training courses and monitoring.
- Prioritise newly registered feed businesses for inspection.
- Increase the number of qualified and/or competent feed officers through training and monitoring to ensure resilience within the Service.
- To identify new feed businesses through self-assessment questionnaires and intelligence sharing.
- To review and update as necessary the register of feed businesses.
- Ensure database is up to date and accurate.

Communicable Disease

- To review the CD procedures with reference to the changes to molecular diagnostic testing.

Appendices

- [Food Safety Sampling Plan](#)
- [Local Public Health Strategic Framework \(relevant sections\)](#)
- [Food Standards Sampling Plan](#)
- National Feed Enforcement Priorities 2018-19
- Corporate Priorities of partner authorities
- Food Standards Agency Audit Report

Appendix A - Food Safety Sampling Plan

Food Safety Sampling Plan 2018/19						
Survey	Survey no. if applicable	Timeframe including days	Target Number of premises in total	Number, to be submitted at one time	Analysis required	Team
Ice Survey from licensed businesses and leisure industry	SRS18-03	May to September Thursdays	60 (30 Cardiff, 15 Bridgend and 15 Vale)	Approx 4	Aerobic colony counts at 37°C and 22°C, <i>E.coli</i> , Coliform, Faecal streptococcus (Enterococcus)	Commercial
Ice- cream and cream	SRS 18-02	May to September Mon- Wednesday	80 (40 Cardiff, 20 Bridgend, 20 Vale)	Approx 4	Aerobic colony count, Enterobacteriaceae, <i>E.coli</i> (most probable number), <i>Listeria monocytogenes</i> and other <i>Listeria</i> spp. (enumeration only), Coagulase positive staphylococcus	Commercial
Herbs and spices		October to March Mon-Wednesday	12 (6 Cardiff, 3 Bridgend, 3 Vale)	Approx 2	To be agreed with PHW as not ready to eat foods.	Commercial
Water and food from mobile vendors	SRS 18-01	April to March Monday to Wednesday	32 (16 Cardiff, 8 Bridgend and 8 Vale)	Approx 6	foods samples: Aerobic Colony Counts, Enterobacteriaceae, <i>E. coli</i> , <i>Staph aureu</i> , <i>Bacillus cereus</i> and species. <i>Listeria monocytogenes</i> and species (direct), <i>Listeria monocytogenes</i> and species (enrichment), <i>Salmonella</i> species (enrichment) swab samples:	Commercial

					Aerobic colony count, Enterobacteriaceae, <i>E.coli</i> water samples: Coliform, E.coli, Enterococci, Aerobic colony count at 37°C for 48hrs, Aerobic colony count at 22°C for 72hrs	
Port Health Waters Shoreside and airside		April to March	13 locations	Approx 5	E. coli, Enterococci, Coliforms, Aerobic Colony Count	Commercial
Imported Foods		April to March unknown	Cardiff International Airport	Approx 4	Dependent on food.	Commercial
Approved Premises:- 17 businesses in total, with 2 potential businesses requiring approval in future		As required	17 - 19	60+ samples in total but can be collected from each business as required, approx. 3-4 at a time	Water at all premises – food samples at most, numbers dependant on types of food produced.	Enterprise & Specialist Services

Appendix B – Local Public Health Strategic Framework



Bwrdd Iechyd Prifysgol
Caerdydd a'r Fro
Cardiff and Vale
University Health Board



Iechyd Cyhoeddus
Cymru
Public Health
Wales

<p>LOCAL PUBLIC HEALTH PLAN 2016/17-2018/19 <i>Second order priority</i></p> <p>Health protection</p> <p>Lead officers: Dr Sian Griffiths, Fiona Kinghorn, Dr Tom Porter, Dr Suzanne Wood (tel: 029 2033 6201)</p> <p>Partnership leads: Dr Gwen Lowe (Health protection, Public Health Wales), Dave Holland (City of Cardiff Council & Vale of Glamorgan Council), Huw Brunt (Environmental health protection, Public Health Wales)</p>	<p>HEADLINE PERFORMANCE INDICATORS OR TARGETS</p> <ul style="list-style-type: none"> No circulating measles in Cardiff and the Vale All declared outbreaks evaluated against World Health Organisation (WHO) evaluation template at their conclusion for outbreaks and environmental incidents Achieve national target of 85% TB treatment completion rate 3,000 teenagers swabbed for meningococcal carriage study Ensure flu vaccination offered to all children in risk groups in special schools 85% uptake of TB screening invitations in higher education 																																				
<p>WHAT ARE WE TRYING TO ACHIEVE? A reduction in the incidence and impact of infectious diseases and environmental hazards in Cardiff and Vale</p>																																					
<p>STORY BEHIND THE PRIORITY AREA</p> <ul style="list-style-type: none"> Infectious disease emergencies cause mortality, morbidity and great anxiety to the public. Preventative evidence-based activities are key in reducing the risk Food borne infections continue to present a serious risk to health. The Pennington Inquiry, following the South East Wales <i>E. coli</i> 0157 outbreak, highlighted local government weaknesses in food procurement, food safety management systems and food hygiene enforcement services. Action plans remain in place to deliver improvements. The Shared Regulatory Service will apply some of the successful action plans established at Cardiff into the Vale of Glamorgan processes to identify and deliver any appropriate improvements Tuberculosis (TB) remains an important cause of morbidity in Cardiff. Control depends on early detection, the completion of effective supervised treatment and the identification and screening of all close contacts and new entrants from high prevalence countries. It is estimated that 14% of the burden of disease in the UK is attributable to environmental stressors and impacts are believed to disproportionately affect the more vulnerable and deprived, therefore actions to address the most common public health impacts associated with exposures play a key role in protecting and improving health. In addition to responding to acute incidents, proactive research is needed to understand relationships between environmental hazards, health outcomes and other factors so effective action can be taken to reduce associated health burdens There is a health protection on-call rota out of hours covering Wales which is staffed by Specialty Registrars and Consultants, including those from the Cardiff and Vale Local Public Health team, in addition to specialist support from Public Health Wales health protection leads. The team also contributes to co-ordinating any LHB actions which may be required as a result of an outbreak or event during work hours 																																					
<p>ACTIONS FOR 2016/17-2018/19</p> <ul style="list-style-type: none"> Deliver the National Food Hygiene Rating Scheme and implement alternative strategies for securing improvements in the food safety performance of local businesses Lead the development and delivery of the Cardiff and Vale of Glamorgan Food Law enforcement service plans 2016/17 Ensure that multiagency preparedness plans are in place to mitigate risk from imported Ebola Virus Disease infection Swab 3,000 teenagers for the meningococcal carriage study to contribute to the evidence base for prevention of meningococcal disease Facilitate preventative activities in vulnerable group settings including infection prevention and control interventions in care homes, and improving flu vaccination uptake in special schools Offer mass TB screening sessions to those at risk in higher education establishments Audit measles control activities to ensure that cases are not missed Provide appropriate and timely responses to infectious disease notifications, identify any linked cases/outbreaks and audit/evaluate this response Deliver enhanced surveillance for <i>Campylobacter</i> to identify clusters of illness associated with food 	<p>ADDRESSING INEQUALITIES</p> <ul style="list-style-type: none"> Tuberculosis is more prevalent among more deprived communities in Cardiff and Vale so targeting this will help reduce inequalities Environmental stressors and impacts disproportionately affect more vulnerable and deprived communities (see above) <table border="1" data-bbox="1126 1102 1946 1227"> <thead> <tr> <th colspan="2">Equality impact assessment (EqIA)</th> <th colspan="4">Key: Impact on inequalities + Positive, - Negative, 0 None</th> </tr> </thead> <tbody> <tr> <td>Age</td> <td>0</td> <td>Caring responsibilities</td> <td>0</td> <td>Disability</td> <td>0</td> </tr> <tr> <td>Gender reassignment</td> <td>0</td> <td>Married or civil partnership</td> <td>0</td> <td>Pregnant or recent birth</td> <td>0</td> </tr> <tr> <td>Race</td> <td>0</td> <td>Religion, belief or non-belief</td> <td>0</td> <td>Gender</td> <td>0</td> </tr> <tr> <td>Sexual orientation</td> <td>0</td> <td>Welsh language</td> <td>0</td> <td></td> <td></td> </tr> <tr> <td colspan="6">Comments and mitigation actions (where required)</td> </tr> </tbody> </table>	Equality impact assessment (EqIA)		Key: Impact on inequalities + Positive, - Negative, 0 None				Age	0	Caring responsibilities	0	Disability	0	Gender reassignment	0	Married or civil partnership	0	Pregnant or recent birth	0	Race	0	Religion, belief or non-belief	0	Gender	0	Sexual orientation	0	Welsh language	0			Comments and mitigation actions (where required)					
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Sexual orientation	0	Welsh language	0																																		
Comments and mitigation actions (where required)																																					

<p>businesses in accordance with the best practice guide endorsed by the Directors of Public Protection in Wales</p> <ul style="list-style-type: none"> • Maintain the capacity of the TB unit to deliver screening and control activities and facilitate TB screening of asylum seekers through the Cardiff Health Access Practice. • Provide appropriate and timely responses to environmental incidents, identify any associated exposed populations and health impacts and audit/evaluate the response • Deliver the Environmental Public Health Team work plan for 2014/15 to 2016/17 • Participate in the delivery of a National Infection Prevention and Control Project for Childcare settings (0-5years) • Participate in the health protection on-call rota 	<p>PARTNERSHIP LINKS</p> <ul style="list-style-type: none"> • Communicable disease <ul style="list-style-type: none"> ○ City of Cardiff and Vale of Glamorgan Councils ○ NHS including GPs, Public Health Wales ○ Third and private sectors ○ Local communities ○ Offender health including Prisons ○ Education • Environment <ul style="list-style-type: none"> ○ Public Health Wales ○ Local Authorities ○ Natural Resources Wales ○ Food Standards Agency
<p>PERFORMANCE TRAJECTORY FOR 2016/17-2018/19</p> <ul style="list-style-type: none"> • Please contact relevant lead for specific trajectories 	<p>RESOURCE RISKS AND REQUIREMENTS</p> <ul style="list-style-type: none"> • Internal (UHB) <ul style="list-style-type: none"> ○ Maintain capacity within TB unit • Partners / Welsh Government <ul style="list-style-type: none"> ○ Maintain resource in local authorities for delivery of communicable disease response in appropriate and timely manner; and resource for food safety function ○ Provide ongoing support for the Environmental Public Health network in Wales

Appendix C - Food Standards Sampling Plan 2018-19

The Shared Regulatory Services Food Sampling Programme for 2018-19 will be made up of planned samples, samples taken in response to food incidents or alerts, samples taken of products from Bridgend, Cardiff and Vale of Glamorgan retailers, samples taken as part of surveys funded by the Food Standards Agency and samples taken as part of combined surveys with other Local Authorities within the 'Glamorgan Group' and Welsh Heads of Trading Standards (WHOTS).

The second element is sampling surveys which the Service is not committed to, however they are surveys that are either, potential areas of concern or will supplement work of existing survey strands. This is intended to be flexible and it means not all surveys may be undertaken and the number of samples taken as part of the surveys may be adjusted to prioritise appropriately during the year. A set budget is available for this work.

Q	Food Matrix	Analysis	Comments	Target Number	Cost per Sample £	Total Cost	Safety, Fraud, Quality	Team
1	Chips (GG)	level of Acrylamide	Retail – variety of premises	10	190		Safety	Commercial
	Satay Sauces (SRS)	Crustacean allergen by ELISA kit	Takeaway premises/ restaurants	20	68		Safety	Commercial
2	Quality/Speciation of 'fresh' fish	TVNB & DNA	Markets/ fresh fish counters	10	220		Quality	Commercial
	Kebab meat products	Casein (milk protein)	Takeaway premises	10	83		Safety	Commercial
3	Indian Sauce Dishes (GG)	Artificial Colours levels Allergens	Takeaway premises	10	113		Safety	Commercial

Q	Food Matrix	Analysis	Comments	Target Number	Cost per Sample £	Total Cost	Safety, Fraud, Quality	Team
	Fresh' claimed (raw) turkeys from butchers	HADH activity		6	113		Fraud	Commercial
4	Food Supplement (GG)	Presence of DMAA	Online sellers	10	167	750	Safety	Commercial
	Non cows' cheese eg. goats	Presence of cows milk	Delicatessens/ markets	10	78		Safety	Commercial
						10236		
All	Complaint sampling	As required				10000	All	Commercial
	Follow up formal sampling							Commercial

Appendix D – National Feed Enforcement Priorities 2017-18



National Enforcement Priorities for England and Wales 2018-2019

Animal feed law enforcement (at all stages of production, processing, storage, transportation and distribution, including import and the primary production of feed)

Food hygiene law enforcement at the level of primary production

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Executive Summary

This document sets out the:

- Food Standards Agency's¹ (FSA) National Enforcement Priorities (NEPs) for England and Wales in respect of animal feed and food hygiene law enforcement at the level of primary production; and
- FSA's expectations of local authorities (LAs) to implement, where relevant, these NEPs as part of their annual intervention programme.

The NEPs have been:

- Informed by the United Kingdom Animal Feed Threat Assessment 2017 ([UK AFTA 2017](#)), commissioned and funded by the FSA and compiled by the National Trading Standards (NTS) Intelligence Team; and
- Developed in consultation with LA representatives; NTS; Regional Feed Leads; the National Agriculture Panel ([NAP](#)) and the National Animal Feed at Ports Panel ([NAFPP](#)) members.

Incorporating the NEPs into a programme of official controls aims to safeguard public and animal health by driving up sustained improvements in levels of compliance by Feed Business Operators (FeBOs) through intelligence led enforcement.

The objectives of the NEPs are to:

- Maintain a level playing field for honest and diligent FeBOs, which is in the interests of the feed industry as a whole;
- Reduce unnecessary burdens on business by focusing LA activity on agreed areas of greatest threat to public and animal health;
- Create a flexible and effective intelligence-led approach to interventions, while maintaining appropriate levels of monitoring of compliance;
- Realise the FSA's strategic goal of '[Food We Can Trust](#)'; and
- Drive up the quality and consistency of official controls.

The priorities will be reviewed on a six monthly basis, in light of emerging issues in-year or as a result of other intelligence received by the FSA in respect of risks to human, animal health and welfare or the environment.

Access will be required to the Knowledge Hub National Agriculture Community forum to view ACTSO guidance referred to throughout the NEPs. LA feed officers are expected to engage with the Knowledge Hub - National Agriculture Community².

¹ <http://www.food.gov.uk/>

² <https://khub.net/>

The NEPs for 2018/19³

The first five priorities relate to animal feed law enforcement (at all stages of production, processing, storage, transportation and distribution, including import and the primary production of feed). The sixth priority relates solely to food hygiene law enforcement at the level of primary production.

Priority 1	• Verification of the presence and accuracy of feed labelling particulars which have the potential to compromise human and/or animal health
Priority 2	• Validation of effective feed safety management systems at Annex II establishments with a focus on businesses supplying former foodstuffs or co-products
Priority 3	• Effective information sharing, communication and exchange of information and intelligence to support effective official feed controls
Priority 4	• Effective monitoring of consignments of feed originating from outside the European Union at points of entry
Priority 5	• Development of risk-based regional sampling programmes
Priority 6	• Effective identification and appropriate registration of food businesses operating at the level of primary production of food

³ The priorities are not listed in any particular order.

Priority 1: Verification of the presence and accuracy of feed labelling particulars, which have the potential to compromise human and/or animal health

- 1.1 Information on feed labels is essential to enable FeBOs throughout the feed chain to make appropriate use of material they use to manufacture feed or use as feed. The presence and accuracy of labelling information is critical in ensuring feed is provided to the correct species, age of animal and in quantities that would not adversely affect human and/or animal health or impact on traceability. The presence of batch codes aids prompt recall and withdrawal of affected products in the event of a feed safety incident.
- 1.2 LAs are expected to prioritise the following aspects of labelling compliance, in consideration of EU Codes of Good Practice on labelling⁴ and [FSA guidance](#):
- a) Identify FeBOs offering feed for sale by means of distance communication, ensuring they are appropriately registered and/or approved and are providing mandatory labelling particulars as required by Article 11(3) of [Regulation \(EC\) No 767/2009 on the placing on the market and use of feed](#)⁵;
 - b) Verify the accuracy of claims as set out in Article 13 of Regulation (EC) No 767/2009;
 - c) Ensure instructions for use are adequate and appropriate to avoid exceeding feed additive MPLs;
 - d) Ensure information supporting traceability, in the event of a feed safety incident, is present and accurate;
 - e) Ensure labelling and presentation of feed does not mislead the user;
 - f) Verify that feed materials included in the EU [register](#) are appropriate for use, as such, and report any suspected non-compliance to the FSA; and
 - g) Verify that additives present in feed are [authorised](#)^{6,7} in line with [Regulation \(EC\) No 1831/2003 on additives for use in animal nutrition](#)⁸.

⁴ [Food producing animal feed](#) and [pet food](#) guides

⁵ https://ec.europa.eu/food/safety/animal-feed/feed-marketing_en

⁶ http://ec.europa.eu/food/safety/animal-feed/feed-additives/authorisation-types-withdrawal_en

⁷ https://ec.europa.eu/food/sites/food/files/safety/docs/animal-feed-eu-reg-comm_register_feed_additives_1831-03.pdf

⁸ Any irregularities identified with the labelling of feed containing specified additives i.e. coccidiostats, histomonostats and non-antibiotic growth promoters should be referred to Veterinary Medicines Directorate (VMD)

Priority 2: Validation of effective feed safety management systems at Annex II establishments with a focus on businesses supplying former foodstuffs or co-products

- 2.1 Contamination of feed often occurs through carry-over, inappropriate storage, mixing or preparation of animal rations, inadequate cleaning of equipment or ineffective implementation of HACCP by the FeBO.
- 2.2 Every year in the UK, around 660,000 tonnes of former foodstuffs are processed as animal feed, worth £110 million⁹. Within the UK, the Waste and Resources Action Programme (WRAP), is continuing to encourage businesses in the food supply chain to sign up to the Courtauld agreement. The agreement aims to improve resource efficiency and reduce the carbon impact of the UK grocery sector, involving manufacturers and retailers reducing food waste by encouraging and developing its use as animal feed¹⁰.
- 2.3 The European Commission sees the processing of 'former foodstuffs' as an important contribution towards reaching the Sustainable Development Goals on reducing food waste. Food waste no longer suitable for human consumption can be used for animal feed purposes and it is been estimated that the amount currently being processed in the EU could be doubled¹¹.

Suppliers of former foodstuffs and co-producers

- 2.4 In consideration of the relevant guidance listed at paragraph 2.6, LAs are expected to:
 - a) Give priority to identifying food and drink manufactures as well as retailers involved in the supply of co-products and/or former foodstuffs (surplus food) into the feed chain and include these in their intervention and sampling programmes through regular liaison with LAs in their area responsible for keeping registers of food business establishments (FBOs) under Article 6(2) of Regulation (EC) No 852/2004 on food hygiene;
 - b) Ensure interventions at businesses involved in the supply of co-products and/or former food stuffs includes the examination of documented feed safety management systems (HACCP plans where they are used), paying particular attention to:
 - The identification of control points to ensure that material is suitable for use as animal feed and does not include items such as meat, fish and shellfish (and products containing them or have been in contact with)¹²;
 - That appropriate segregation is in place with material not intended for use as feed;
 - The existence of a recorded training programme for staff in charge of dealing with former foodstuffs;
 - That the material is being supplied to a registered feed business establishment ;

⁹ <http://www.wrap.org.uk/content/using-surplus-food-animal-feed>

¹⁰ <http://www.wrap.org.uk/content/courtauld-commitment-2025>

¹¹ https://ec.europa.eu/food/safety/food_waste/eu_actions_en

¹² More information on surplus food eligible for feeding can be found at: <https://www.gov.uk/how-food-businesses-must-dispose-of-food-and-former-foodstuffs>

- Where the material is a former foodstuffs containing food grade packaging intended for use in feed, that the material is to undergo further treatment at a feed business which specialises in the removal of packaging from surplus food¹³; and
- In the case of processors of former foodstuffs into feed that their suppliers and hauliers are all registered as feed businesses.

Other FeBOs required to implement feed safety management systems

2.5 In consideration of the relevant guidance listed at paragraph 2.6, LAs are expected to:

- a) Give priority to ensuring appropriate systems are in place to minimise cross-contamination between batches of feed (particularly in respect of those containing coccidiostats, veterinary medicines or [additives](#) with maximum permitted levels for particular target species), in accordance with the FSA sampling [protocol](#) and [guidance](#); and
- b) Ensure that FeBOs understand legal requirements, are implementing and maintaining and reviewing, as appropriate, their feed safety management systems, having regard to the nature, size and scale of business. This should include a focus on the following:
 - Examination of written feed safety management systems;
 - Identification of hazards to ensure all steps in the process have been considered and any grouping of steps (e.g. consideration of individual ingredients) is appropriate and not done in such a way that hazards are overlooked or applied incorrectly;
 - That any Critical Control Points (CCPs) identified are properly defined and controlled. Where the CCP is already controlled by a pre-requisite procedure the necessity for the relevant CCP should be discussed with the feed business;
 - Appropriate sampling programmes at the feed business are in place to verify compliance with maximum permitted levels of undesirable substances in feed materials and additives. These checks should also include an examination of results of analysis and consideration of whether appropriate action has been taken where product is found to be unsatisfactory e.g. notification to the competent authorities responsible for feed enforcement in accordance with Article 20 (3) of Regulation (EC) No 178/2002;
 - Ensuring suppliers to individual feed establishments are themselves registered as feed business establishments. It would be appropriate to examine customer supplier lists to establish who supplies the business with materials used in the production of feed or feeding stuffs for distribution;
 - In the case of those companies supplying additives or premixtures, checks should be carried out to establish whether farms receiving such material are known to the LA where they are based and that the registered activity code for such farms is appropriate; and
 - Scrutinise traceability systems to ensure that products not intended for feed use are not diverted into the feed/food chain.

2.5 The following guidance is available to support LAs:

¹³ Agency published guidance on the presence of food grade packaging material in feed in September 2013: <http://multimedia.food.gov.uk/multimedia/pdfs/enforcement/enf-e-13-040.pdf>

- Community [guides](#) to good practice were developed in accordance with Article 22 of [Regulation \(EC\) No 1831/2003](#) laying down requirements for feed hygiene;
- [Codex Alimentarius Standards](#) relevant to feed;
- [PAS 222:2011](#) Prerequisite programmes for food safety in the manufacture of food and feed for animals;
- FSA guidance on [mixing additives and premixtures directly in feeds and mixing compound feed with additives](#) and [HACCP-related requirements of the Feed Hygiene Regulation](#) for farmers;
- European Feed Manufacturers (EMFC) [guide](#) published by the European Feed Manufacturers' Federation (FEFAC) on good practices for the industrial manufacturing of compound feed and premixtures for food producing animals;
- EU community [guide](#) to good practice for feed additive and premixture operators;
- EU [guide](#) to good practice for the industrial manufacture of safe feed materials;
- EU [guide](#) to good hygiene practices for the collection, storage, trading and transport of cereals, oilseeds, protein crops, other plant products and products derived thereof;
- Defra [Code of Practice](#) for the control of salmonella during the production, storage and transport of compound feeds, premixtures, feed materials and feed additives;
- AIC [guidance](#) on the application of HACCP principles - a practical guide for the agri-food supply chain; and
- FSA [guidance](#) on the requirements for food and drink businesses that supply material for animal feed use.

Priority 3: Effective information sharing, communication and exchange of information and intelligence to support effective official feed controls

- 3.1 The FSA's strategic plan refers to the 'importance of continuing to develop and apply a robust evidence base' in our work and a commitment to 'gather and use evidence to identify and understand the biggest risks and challenges'. Gathering and exchange of information, data and intelligence between Competent Authorities, Central Government Departments, Member States and industry is a key element to an effective risk-based system of official feed controls.
- 3.2 With the UK's impending exit from the EU we are currently in a period of uncertainty regarding our future global trade partners. The UK feed and food export industry, worth £11 billion currently, accounts for 60% of exports and it is imperative that future official controls delivered provide assurance to the UK's trading partners. Like any major industry, it is vulnerable to a wide range of criminal activity.
- 3.3 LAs are expected to:

- a) Proactively share with, and report to, the [National Food Crime Unit](#) (NFCU) all of the intelligence they become aware of in relation to known or suspected cases of food and/or feed fraud, including historic cases;
- b) In England only, comprehensively complete the NTS bi annual reports about [imported](#) and [inland feed](#) activity;
- c) Proactively implement the feed hygiene [MoU](#) between the VMD and the APHA in England and Wales which supports an intelligence led, risk-based approach to enforcement, prevents duplication of work and aids effective use of resources; and
- d) Ensure their databases accurately reflect all activities undertaken by feed business establishments and that these establishments are appropriately registered, in consideration of [FSA](#) and ACTSO guidance on:

- [Registration, amendment and revocation of FeBOs under Regulation \(EC\) No 183/2005](#); and
- [Top tips for managing local authority feed databases](#).

3.4 Where they are responsible for a point of entry, LAs are expected to:

- a) Have regard to ACTSO [guidance](#) on sharing information and intelligence to support delivery of imported feed controls;
- b) Liaise with inland authorities and proactively share information and intelligence in accordance with ACTSO guidance on [inland referrals](#). If requested LAs are expected to acknowledge and respond to the originating authority, in respect of inland referrals, to confirm the action taken. This will allow checks to be carried out by inland authorities to ensure establishments:
 - Are on the LA feed establishment register?
 - Are included in their inspection programme to enable follow-up action to be taken as appropriate?
 - Have a [3rd country representative](#) within the EU, as appropriate?
- c) Consider liaising with the LA responsible for the nearest large point of entry for feed, or other appropriate point of contact, to use their expertise and co-operation to assist in implementing a proportionate system of official controls having regard to FSA guidance on:
 - Import controls at [smaller sea port and airports](#); and
 - Imported feed checks undertaken by [inland authorities](#).

Priority 4: Effective monitoring of consignments of feed originating from outside the European Union at points of entry

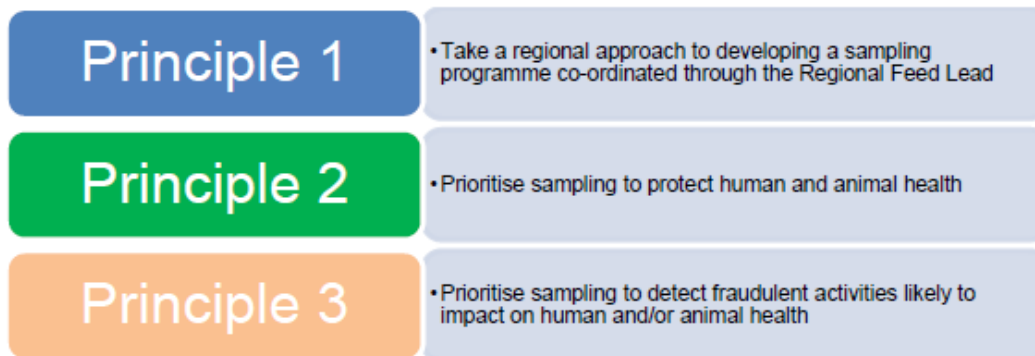
- 4.1 Imported feed makes up 40% of feed used in the UK annually. To support a consistent and risk-based approach to monitoring 3rd country imports LAs are expected:
- a) To prioritise monitoring in consideration of the ACTSO [guidance](#) on consistency and prioritisation of the delivery of official feed controls at points of entry; and
 - b) To monitor consignments of animal feed to ensure:
 - Products, in [Annex I of Regulation \(EC\) No 669/2009](#), on the list of high-risk products of non-animal origin, enter the UK having first passed through an appropriate designated point of entry (DPE), in consideration of FSA [guidance](#);
 - Products, in [Annex I of Regulation \(EU\) No 884/2014](#), subject to safeguard controls due to aflatoxin contamination, enter the UK having first passed through an appropriate designated point of import (DPI), in consideration of EU [guidance](#).

A list of [DPEs](#), [DPIs](#) and '[safeguard measures](#)' applicable to imports of animal feed can be found on the FSA website.

Priority 5: Development of regional risk-based sampling programmes

Targeted use of available funds in England and Wales for sampling

- 5.1 The FSA believes that sampling and analysis forms an important part of UK official feed controls. The main objectives of feed sampling are to:
- a) Protect animal and human health;
 - b) Promote fair trade and deter bad practices;
 - c) Detect fraudulent activities; and
 - d) Provide advice and support to businesses.
- 5.2 This years' FSA funded sampling programme has been informed by the UK AFTA 2017. To ensure that available funds, for the analysis of feed, are used effectively, LAs are expected to:
- a) Embrace the three principles below;
 - b) Consider ACTSO [guidance](#) on how to plan and take samples; and
 - c) Have regard to the restrictions in paragraph 5.3 but also the caveat in paragraph 5.4.



5.3 LAs are expected to ensure:

- a) All sampling takes account of previous results of analysis carried out at feed businesses and FeBOs own sampling and analysis;
- b) Feed materials rather than compound feed are prioritised for testing for the presence of [undesirable substances](#), unless there is good reason to believe systems in place to prevent contamination during the production of the feed are not effective; and
- c) Products which appear in Annex 1 of Regulation (EC) No 669/2009 on high-risk feed are not prioritised as they should already have undergone increased levels of official controls at points of entry.

5.4 Should a LA or Region on the basis of intelligence, with a view to validation of a potential threat to feed safety, human and/or animal health and welfare and/or significant economic impact, determine the need to carry out sampling other than as part of the national sampling programmes - they are encouraged to do so but this will need to be funded locally.

Sampling Priorities at Points of Entry

5.5 Sampling imported feed is a key mechanism to ensure the safety and quality of feed and food entering the UK from countries outside of the EU.

5.6 All LAs with responsibility for points of entry should:

- a) Include provision in their regional programmes to sample products at points of entry on a risk basis. In addition;
- b) Give priority to the sampling and analysis of products, particularly additives and feed materials originating from outside the EU to assess compliance with feed safety requirements;
- c) Have regard to the ACTSO [guidance](#) on consistency and prioritisation of the delivery of official feed controls at points of entry in respect of prioritising sampling at points of entry; and
- d) Give priority to sampling consignments which have not been sampled recently or have not been seen before at the point of entry or where there is reason to believe they might fail to comply with EU requirements.

5.7 These sampling priorities are in addition and separate to any sampling which might be required as part of specific '[safeguard measures](#)' on animal feed.

Priority 6: Effective identification and appropriate registration of food businesses operating at the level of primary production of food

- 6.1 One of the recommendations from a European Commission [audit](#) of the UK which evaluated the system of official controls relating to microbial safety of primary products of non-animal origin (FNAO) was that controls must adequately take into account identified risks to food safety, in light of [EFSA opinions](#) on the microbiological hazards presented in ready to eat foods.
- 6.2 The identification of higher risk 'ready to eat food' business establishments operating at the level of primary production will assist in the future delivery of a more targeted, prioritised food hygiene inspection programme to achieve greater efficiencies and public health protection while limiting inspection burdens on businesses.
- 6.3 LAs are expected to give priority to:
 - a) The identification and correct classification of activity of higher risk 'ready to eat food' business establishments operating at the level of primary production in their area. For 2018-2019 these are producers of micro leaves, baby leaves, herbs, watercress, lettuce, spinach, strawberries, salad onions, radishes, celery, chicory, in consideration of FSA [guidance](#); and
 - b) Ensuring that LA databases accurately reflect the activity undertaken by Food Business Operators (FBOs) and that these establishments are appropriately registered.

Appendix E – Corporate Priorities and outcomes of partner local authorities

Bridgend County Borough Council	City of Cardiff Council	Vale of Glamorgan Council
		

Corporate Priorities

<ul style="list-style-type: none"> • Supporting a successful economy; • Helping people to become more self reliant; • Smarter use of resources 	<ul style="list-style-type: none"> • Working for Cardiff; • Working for Wales; • Working for the future; • Working for public services 	<ul style="list-style-type: none"> • Reducing poverty and social inclusion; • Providing decent homes and safe communities; • Promoting regeneration, economic growth and employment; • Promoting sustainable development and protecting our environment; • Raising overall standards of achievement; • Valuing culture and diversity; • Encouraging and promoting active and healthy lifestyles; • Safeguarding those that are vulnerable and promoting independent living.
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Corporate Outcomes

<ul style="list-style-type: none"> • Supporting a successful economy; • Helping people to become more self reliant; • Smarter use of resources 	<ul style="list-style-type: none"> • Cardiff is a great place to grow up; • Cardiff is a great place to grow older; • Supporting people out of poverty; • Safe, confident and empowered communities; • A Capital City that works for Wales; • Cardiff grows in a resilient way; • Modernising and integrating our public services. 	<ul style="list-style-type: none"> • An inclusive and safe Vale; • An environmentally responsible and prosperous Vale; • An aspirational and culturally vibrant Vale; • An active and healthy Vale.
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Appendix F – Food Standards Agency Audit Report

Report attached.



Report on the Food Law Enforcement Services

Shared Regulatory Services
15th – 23rd March 2017

Foreword

Audits of local authority food and feed law enforcement services are part of the Food Standards Agency's (FSA) arrangements to improve consumer protection and confidence in relation to food and feed. These arrangements recognise that the enforcement of UK food and feed law relating to food safety, hygiene, composition, labelling, imported food and feedingstuffs is largely the responsibility of local authorities. These local authority regulatory functions are principally delivered through their Environmental Health and Trading Standards Services.

The attached audit report examines the local authority's Food Law Enforcement Services. The assessment includes consideration of the systems and procedures in place for interventions at food businesses, food sampling, internal management, control and investigation of outbreaks and food related infectious disease, advice to business, enforcement, food safety promotion. It should be acknowledged that there may be considerable diversity in the way and manner in which authorities provide their food enforcement services reflecting local needs and priorities.

Agency audits assess local authorities' conformance against the Feed and Food Law Enforcement Standard. "The Standard", which was published by the Agency as part of the Framework Agreement on Official Feed and Food Controls by Local Authorities (amended April 2010) is available on the Agency's website at:

https://signin.riams.org/files/display_inline/45532

The main aim of the audit scheme is to maintain and improve consumer protection and confidence by ensuring that authorities are providing effective food and feed law enforcement services. The scheme also provides the opportunity to identify and disseminate good practice, and provides information to inform Agency policy on food safety, standards and feedingstuffs and can be found at:

<https://www.food.gov.uk/about-us/local-authorities>

The report contains some statistical data, for example on the number of food establishment inspections carried out. The Agency's website contains enforcement activity data for all UK local authorities and can be found at:

<https://www.food.gov.uk/about-us/local-authorities>

The report also contains an action plan, prepared by the authority, to address the audit findings.

For assistance, a glossary of technical terms used within the audit report can be found at Annex C.

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1 Introduction

- 1.1 This report records the results of an audit of food hygiene and food standards at the Shared Regulatory Services of Bridgend, Cardiff and the Vale of Glamorgan Councils under the headings of the FSA Feed and Food Law Enforcement Standard. It has been made publicly available on the Agency's website at <https://www.food.gov.uk/other/local-authority-audits-2010-2017-wales>

Reason for the Audit

- 1.2 The power to set standards, monitor and audit local authority food and feed law enforcement services was conferred on the FSA by the Food Standards Act 1999 and the Official Feed and Food Controls (Wales) Regulations 2009. The audit of the food services at Shared Regulatory Services was undertaken under section 12(4) of the Act and Regulation 7 of the Regulations.
- 1.3 Regulation (EC) No. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law and includes a requirement for competent authorities to carry out internal audits or to have external audits carried out. The purpose of these audits is to verify whether official controls relating to feed and food law are effectively implemented. To fulfil this requirement, the FSA, as the central competent authority for feed and food law in the UK has established external audit arrangements. In developing these, the Agency has taken account of the European Commission guidance on how such audits should be conducted.¹
- 1.4 The service was audited as part of a three year programme (2013 – 2016) of full audits of the 22 local authorities in Wales.

Scope of the Audit

- 1.5 The audit covered Shared Regulatory Services' arrangements for the delivery of food hygiene and food standards enforcement services. The on-site element of the audit took place at the services' offices at the Civic

¹ Commission Decision of 29 September 2006 setting out the guidelines laying down criteria for the conduct of audits under Regulation (EC) No. 882/2004 of the European Parliament and of the Council on Official Controls to verify compliance with feed and food law, animal health and animal welfare rules (2006/677/EC).

Office, Holton Road, Barry, CF63 4RU between 15th – 23rd March 2017 and included verification visits at food businesses to assess the effectiveness of official controls implemented by the service, and more specifically, the checks carried out by the services' officers, to verify food business operator (FBO) compliance with legislative requirements.

- 1.6 The audit also afforded the opportunity for discussion with officers involved in food law enforcement with the aim of exploring key issues and gaining opinions to inform Agency policy.
- 1.7 The audit assessed the services' conformance against "The Standard". The Standard was adopted by the FSA Board on 21st September 2000 (It was subject to its fifth amendment in April 2010.) and forms part of the Agency's Framework Agreement with local authorities. The Framework Agreement can be found on the Agency's website at https://signin.riams.org/files/display_inline/45532
- 1.8 The audit also reviewed the action taken by the services in relation to two previous FSA audits – the full audit of Bridgend County Borough Council's food services undertaken in 2013 and the Shellfish Traceability and Authenticity exercise undertaken at Cardiff Council in 2014.

Background

- 1.9 Shared Regulatory Services (SRS) is a collaborative service formed between Bridgend, Cardiff and the Vale of Glamorgan Councils on 1st May 2015. The new Service delivers an integrated service under a single management structure for Trading Standards, Environmental Health and Licensing functions with shared governance arrangements. This is a significant transformational change involving the merger of the relevant regulatory functions of the three local authorities. This includes the food hygiene and food standards services.
- 1.10 The services cover the areas of Bridgend, Cardiff and Vale of Glamorgan unitary authorities in south-east Wales. There are borders with four other local authority areas – Neath-Port Talbot to the north-west, Rhondda-Cynon-Taf and Caerphilly to the north and Newport to the east.
- 1.11 The remainder of the border is made up of the coastline which runs from the Wentloog area in the east, past the Rhymney River estuary, the

mouths of the Taf and Ely rivers at Cardiff Bay, Lavernock Point, Barry Docks, Whitmore Bay, along the Bristol Channel to Nash Point before tracking the south-west coast past Dunraven Bay, the Ogmore estuary and Porthcawl towards the Kenfig sand dunes. The area includes Flat Holm and Sully Islands, and the river valleys of the Ogmore, Llynfi and Garw.

- 1.12 The area is both rural and urban. The City of Cardiff and towns of Bridgend and Barry are the main administrative and commercial centres, with many other towns and villages situated amongst areas of natural beauty; including the coastal attractions of Porthcawl, Ogmore, Southerndown, Llantwit Major, Barry Island and Penarth.
- 1.13 According to the 2011 Census, the authorities making up the SRS area had a combined population of 588,836 and this was estimated to have exceeded 625,000 during 2015. The population density is the highest in Wales. Approximately 90% of the population was White, whilst the number of Welsh speakers was, on average, 10.5% of the population; amongst the lowest levels in Wales.
- 1.14 Cardiff is the commercial, financial and administrative centre of Wales and its population rises by 70,000 commuters and visitors each day. The night-time economy can attract over 40,000 people and sometimes more than 100,000 when the city's Millennium Stadium hosts international events. The economy of the region also includes tourism, and agriculture. The population increases significantly due to tourism in the summer months and the main tourist centres outside of Cardiff are Porthcawl and Barry Island. There are also three ports at Cardiff Docks, Barry Docks and Cardiff International Airport requiring the inspection of vessels under both food safety and international health regulations. The importation of food of animal origin from outside of the European Community does not currently take place, however, food not of animal origin is imported at Cardiff.
- 1.15 Cardiff contains overall indicators of deprivation worse than the Wales averages as determined by the 2014 Welsh Index of Multiple Deprivation and Bridgend is similar to the Wales averages, whilst the Vale of Glamorgan is better than the Wales averages for overall indicators of deprivation. However, Cardiff is rated similar to the Wales average with regards to employment and better than average with regards to access to

services. Bridgend is more deprived than average with regards to employment, health and education but better than average with regards to access to services, community safety, the physical environment and housing. The Vale of Glamorgan is rated similar to the Wales average with regards to community safety and the physical environment.

- 1.16 Food hygiene law enforcement was being carried out by officers in the area Food and Port Health Teams in Commercial Services and also in the Industry and Major Investigations Teams within Enterprise and Specialist Services. Food standards law enforcement was being carried out by officers in the Trading Standards team in Commercial Services and also in the Industry and Major Investigations Teams within Enterprise and Specialist Services.
- 1.17 Officers and support staff responsible for food hygiene and food standards were based at the Civic Offices, Angel Street, Bridgend, Civic Offices, Holton Road, Barry, and at Cardiff County Hall, Atlantic Wharf, Cardiff.
- 1.18 The service reported that it had a guaranteed 24 hour emergency out-of-hours service. The out-of-hours service was not tested as part of the audit.
- 1.19 At the beginning of 2015/16 there were around 6000 food establishments in the SRS region, of which 13 were approved food establishments.
- 1.20 The authority had just over 41 full time equivalent (FTE) officers involved in the delivery of food hygiene and food standards with contractors being used to cover absences.
- 1.21 The authority provided officers with opportunities for continuous professional development in their field of work. A training budget was available across the whole service and this was being maintained year on year.
- 1.22 The annual budget for food law enforcement and associated activities was not specified in the service plan but a figure of £ 3,520,442 was provided for the entirety of the teams involved in food. However as those teams undertake other work, this figure does not reflect the allocation to food only. As this was the first year of the service, no trend was available.
- 1.23 The service had been participating in the National Food Hygiene Rating Scheme which was launched in Wales in October 2010. At the time of the

audit, the food hygiene ratings of 4999 food establishments in the region were available to the public on the National Food Hygiene Rating Scheme website.

2 Executive Summary

- 2.1 The audit examined Shared Regulatory Services' arrangements for the delivery of official food controls. This included reality checks at food establishments to assess the effectiveness of official controls and more specifically, the checks carried out by the Service's officers, to verify food business operator (FBO) compliance with legislative requirements. The scope of the audit also included an assessment of the Service's overall organisation and management, and the internal monitoring of food law enforcement activities.
- 2.2 Shared Regulatory Services (SRS) is a collaborative service formed between Bridgend, Cardiff and the Vale of Glamorgan unitary authorities on 1st May 2015. The new Service delivers an integrated service under a single management structure for Trading Standards, Environmental Health and Licensing functions with shared governance arrangements. This includes the food hygiene and food standards services. The service aims to realise benefits from the merger, including improved resilience and enhanced joint working practices.
- 2.3 The Head of Shared Regulatory Services had overall responsibility for the delivery of food hygiene and food standards services within Shared Regulatory Services. Operational Managers had responsibility for specific service areas and day to day management was the responsibility of the various Team Managers.
- 2.4 The Service had service planning arrangements in place together with systems for on-going monitoring, reviewing and reporting performance. Service planning documents contained some but not all the information set out in the Service Planning Guidance in the Framework Agreement including the requirements to plan work in accordance with the Food Law Code of Practice and to estimate the resources required to deliver the services.
- 2.5 Arrangements were in place to ensure effective service delivery by appropriately authorised, competent officers. Officers had mostly been authorised in accordance with their qualifications, training and experience, however, the need to review authorisations to ensure all officers are authorised in accordance with their qualifications was identified. Additionally, the Service had identified capacity issues and would benefit

from ensuring a sufficient number of authorised officers are employed to deliver the work detailed within the service plan and in accordance with the Food Law Code of Practice.

- 2.6 A documented work procedure had been developed to ensure the accuracy of the Service's food establishments' database. Audit checks identified that although food establishment information was mostly up to date, improvements are required in relation to the accuracy of risk rating data and due dates for both food hygiene and food standards and also enforcement data for food hygiene. The Service was midway through introducing a new database as part of a collaboration project to procure new Public Protection software for adoption by local authorities across Wales in order to improve consistency and value for money. The Service had been able to provide Local Authority Enforcement Monitoring System (LAEMS) returns to the FSA.
- 2.7 Record and database checks confirmed that the food hygiene service had prioritised inspections of higher-risk businesses and approved establishments whilst some establishments, mostly lower risk, were not being inspected at the frequencies required by the Food Law Code of Practice and centrally issued guidance. Food standards inspections in establishments known to be high risk had generally been delivered in accordance with the Food Law Code of Practice and centrally issued guidance whilst some medium and low risk establishments were not being inspected at the frequencies required by the Food Law Code of Practice and centrally issued guidance. However, a significant number of establishments required a primary inspection to ensure they were properly included in the food standards intervention programme.
- 2.8 Inspection records demonstrated that a thorough assessment of business compliance had taken place during most food hygiene inspections and for food standards where updated inspection forms were in use. However, in some cases, including most food standards inspections and for some approved establishments; insufficient information was available in some aspects of intervention records to demonstrate that a thorough assessment had been undertaken by officers in accordance with the Food Law Code of Practice.
- 2.9 Revisits and most follow up action was being carried out as required for both food hygiene and food standards interventions; with some exceptions

relating to follow up of food hygiene issues. Most food standards interventions were being risk rated in accordance with the Food Law Code of Practice but this was not always the case, due to a non-food specific rating system being used. Whilst food hygiene risk ratings were generally in accordance with inspection findings, particularly for approved establishments, some ratings were not consistent.

- 2.10 Food hygiene and food standards inspection records and reports contained some of the information required, however, they would benefit from improvement to ensure that they include all of the information required by the Food Law Code of Practice. The need to improve the retention of food standards records and reports was also identified.
- 2.11 Food standards sampling interventions, notifications of food related infectious disease and food incident interventions had taken place in accordance with the Food Law Code of Practice. However, not all food and food establishment complaints or food hygiene samples had been appropriately investigated or appropriate records maintained.
- 2.12 The Service had been proactive in providing advice and guidance to food businesses. Initiatives had also taken place to promote food hygiene and food standards.
- 2.13 Where formal enforcement action had been taken it had been appropriate in the circumstances. However, in a number of cases where enforcement action was an option, decisions had been taken not to proceed in accordance with the Compliance and Enforcement Policy but the reasons had not been documented. In some cases the appropriate processes had not been followed as required by the Food Law Code of Practice and official guidance.
- 2.14 There was some evidence of internal monitoring of food hygiene and food standards services. Full implementation of the authority's internal monitoring procedures will assist in securing the necessary improvements.
- 2.15 Significant progress had been made in implementing requirements following a full food audit of Bridgend Council in 2013, a follow up of that audit in 2015 and a focussed shellfish traceability and authenticity

exercise in Cardiff Council during 2014. The outstanding requirements have been absorbed into the recommendations of this report.

2.16 The Service's Strengths

Advice to businesses

The Service had been proactive and was able to demonstrate that it works with businesses to help them comply with the law.

Control and Investigation of Food Related Infectious Disease

The Service's investigation of outbreaks and notifications of infectious disease included areas of good practice. Records of food related infectious disease demonstrated that appropriate investigations had consistently been carried out.

Incidents

The Service was able to demonstrate that it had initiated and responded to notifications of incidents in a timely and effective manner, investigating and sharing information with the FSA and other authorities.

Liaison

The authority had robust arrangements in place to liaise with neighbouring local authorities and other appropriate bodies to facilitate consistent enforcement.

Food Safety and Standards Promotion

The Service had delivered a number of initiatives with the aim of promoting food hygiene and standards. The Service demonstrated good practice in using a Media and Promotion Plan to co-ordinate its promotional activity.

2.17 The Service's Key Areas for Improvement

Authorised Officers

The Service should ensure it appoints the required number of officers in accordance with the staff resource assessment required in the service plan.

Food Establishments' Database

The Service's database included errors with regards to risk ratings and due inspection dates for both food hygiene and food standards inspection

programmes including a significant number of establishments requiring a primary food standards inspection.

Food Hygiene and Food Standards Intervention Frequencies

The Service had not carried out food hygiene and food standards interventions at the minimum frequencies required by the Food Law Code of Practice. Interventions carried out at the minimum frequency ensure that risks associated with food businesses are identified and followed up in a timely manner.

Food Standards Interventions and Inspections, Records and Reports

Information captured by officers during interventions was not always sufficiently detailed to demonstrate that thorough assessments of business compliance had been undertaken for all key aspects. Intervention / inspection reports provided to food business operators did not always contain all the information required by the Food Law Code of Practice and had not always been retained.

Audit Findings

3 Organisation and Management

Strategic Framework, Policy and Service Planning

- 3.1 Food law enforcement was overseen by the Shared Regulatory Services Joint Committee on behalf of each of Bridgend, Cardiff and the Vale of Glamorgan councils. The service's Joint Working Agreement set out its decision-making arrangements. Under the Joint Working Agreement, decisions on most operational matters had been delegated to the Head of Shared Regulatory Services.
- 3.2 A 'Food and Feed Law Service Plan 2016/17' ('the Service Plan') had been developed by the service along with a separate Port Health Service Plan 2016/17 and the higher level SRS Business Plan 2016/17. There was evidence that the Service Plan had been approved by the Shared Regulatory Services Joint Committee.
- 3.3 The Service Plan contained most of the information set out in the Service Planning Guidance in the Framework Agreement, including a profile of the Service, the scope of the service and organisational structure chart for the Public Protection department. The times of operation, service delivery points and aims and objectives of the service were clearly set out.
- 3.4 The service plan indicated that there were 5876 food establishments in SRS.
- 3.5 The profile of businesses in SRS were provided by establishment type for food hygiene and food standards. The number of planned interventions due in 2016 / 17 was provided by risk rating.
- 3.6 In respect of food hygiene the following information was provided in the Service Plan:

Risk Category	Interventions due (including any backlog)		
	Bridgend	Cardiff	Vale of Glamorgan
A	6	80	14
B	73	234	66
C	413	893	358
D	101	580	111
E	138	525	225
Unrated (existing)	47	39	31
New businesses identified in the year	Est 159	Est 650	Est 159
Total	937	3001	964

3.7 The targets and priorities for food hygiene had been identified in the Service Plan. These included a commitment to deliver all inspections / interventions due at risk category A & B establishments but only 80% of category C establishments.

3.8 In respect of lower-risk establishments, the Service Plan stated that they would receive either an inspection alternated with a verification visit or where eligible, would be subject to alternative intervention activity; both in accordance with the Food Law Code of Practice.

3.9 The number of revisits previously undertaken had also been identified and the Plan would benefit from estimating the number of such revisits expected in the coming year.

3.10 The following information was provided in respect of food standards:

Risk Category	Interventions due (including any backlog)		
	Bridgend	Cardiff	Vale of Glamorgan
High	9	114	6
Medium	204	764	362
Low	306	661	312

3.11 The targets and priorities for food standards were unclear in relation to obligations under the Food Law Code of Practice. Auditors were advised that there was a commitment to deliver all inspections / interventions due at high risk establishments and within new businesses. The Service Plan would benefit from documenting this commitment and to also document the commitments with regards to medium and low risk establishments in relation to the obligations under the Food Law Code of Practice.

- 3.12 The number of revisits had not been identified and the Plan would benefit from estimating the number of such revisits expected in the coming year.
- 3.13 The Service's priorities and intervention-targets as set out in the Service Plan for food hygiene were risk based.
- 3.14 The resources available to deliver food law enforcement services were detailed in the Service Plan as 35.5 full time equivalent officers (FTEs) for food hygiene and 5.88 FTE for food standards. The FTE for administrative support staff had not been provided. A breakdown was provided of the different levels of officers available by qualification.
- 3.15 The Service had indicated the likely demand, based on previous years, for all aspects of food service delivery except for requests for advice and port health interventions. However, no estimates were provided for the resources required for each aspect of food service delivery. Further, an overall assessment of the resources required to deliver the full range of food official controls against those available had not been provided.
- 3.16 The Service Plan included information on the Service's Enforcement Policy and its approach to staff development. The necessity to undertake work on weekends and out-of-hours had been clearly stated.
- 3.17 The Plan confirmed that the service had entered into three Primary Authority arrangements but the Service Plan did not identify the obligations under the Home Authority principle including its commitments to support locally based manufacturers and other regulators as an Originating Authority.
- 3.18 Arrangements for internal monitoring or 'quality assessment' of the food hygiene service were set-out in the Service Plan which would benefit from expansion to include the arrangements for quantitative monitoring assessments.
- 3.19 The overall costs of providing food law enforcement services had been provided in the Service Plan including a breakdown of some non-fixed costs such as staffing, travel and subsistence and sampling. Further information with regards to the trend in growth or reduction of the budget, should be provided in future plans in accordance with the Service Planning Guidance.

- 3.20 The Service Plan set out how the Service's performance in delivering food official controls would be reviewed against the previous year's plan and information on the latest review was included in the service plan. It was noted that the review did not cover all service targets including the number of new businesses inspected for food standards and the timeliness of responses to service requests.
- 3.21 Variations in achieving the targets set-out in the previous Service Plan were identified throughout the 2016 / 17 Service Plan. Variances for the food hygiene new business interventions and medium and low risk food standards interventions had not been explained as required by the service planning guidance.
- 3.22 The Service had incorporated a number of areas for improvement in its 2016 / 17 Service Plan but these did not address the provision of resources so as to fully resolve the root cause of each variance.

Recommendations

- 3.23 The Service should:
- (i) Ensure future Service Plans for food hygiene and food standards are developed in accordance with the Service Planning Guidance in the Framework Agreement. In particular, an estimate of the resources required to deliver the services against those available should be provided. [The Standard – 3.1]
 - (ii) Ensure the annual performance review includes all information on the previous year's performance against the food service plan and any specified performance targets, standards and outcomes. [The Standard – 3.2]
 - (iii) Ensure all variances in meeting the food service plan is addressed in its subsequent plan. [The Standard – 3.3]

4 Review and Updating of Documented Policies and Procedures

- 4.1 A document control procedure had been developed for the food hygiene and food standards services. The procedure included control over the production, approval, review, updating and storage of policies, procedures and associated documents.
- 4.2 Documents were stored electronically and were protected from unauthorised access. Hard copies of these documents were also available to provide access in the event of computer failure.
- 4.3 Managers were responsible for developing and approving documents as well as ensuring they are subject to review, according to specified intervals but also as appropriate to any necessary changes. Permissions to make changes to the list of documents or individual documents are restricted to nominated individuals. They were also responsible for ensuring the removal of superseded documents.
- 4.4 Auditors were able to verify that officers had access to policies and procedures, legislation and centrally issued guidance either physically, electronically or where applicable, on the internet. Parts of the service had previously had access to legislation and guidance through the information portals and the service was considering providing officers with access to a legal services portal in the future.
- 4.5 Documents had been subject to review in line with the procedures.

5 Authorised Officers

- 5.1 The Service's Scheme of Delegation of Powers to Officers, contained within the Joint Working Agreement provided the Head of Shared Regulatory Services with delegated powers to execute all duties relating to both the food hygiene and food standards services. This included the delegated authority to authorise other officers and to authorise legal action in conjunction with the Head of Legal Services for the relevant authority.
- 5.2 A documented procedure had been developed for the authorisation of food hygiene and food standards officers based on their qualifications and experience.
- 5.3 Lead officers for food hygiene, food standards and communicable disease had been appointed, all of whom had the requisite qualifications, training and were able to demonstrate appropriate knowledge.
- 5.4 The Service Plan stated that resources had prevented the Service from planning its intervention programmes in accordance with the minimum statutory standards laid out in the Food Law Code of Practice. It aimed to achieve only 80% of high risk category C food hygiene interventions and only high risk and new food standards interventions. Resources had also been identified as the reason for failing to undertake the planned programme of medium and low risk food hygiene interventions. Further, there were a significant number of overdue interventions identified during an analysis of the database, including a large number of unrated food standards establishments. This operational backlog that will add to the resource burden. The Service should ensure it appoints the required number of officers in accordance with the staff resource assessment required in the Service Plan.
- 5.5 The Service has systems in place to identify officer training needs including individual training needs assessments and internal monitoring activities. The Service was providing a combination of in-house and externally provided training and making good use of the opportunities afforded by the FSA local authority training programme. All officers were required to achieve 10 hours of continual professional development (CPD) in accordance with the Codes of Practice. The Service is able to fund training from the whole SRS budget where a need has been demonstrated.

- 5.6 An examination of the authorisation, qualification and training records of 10 officers involved in the delivery of official food controls was undertaken. The arrangements for maintaining training records had recently been amended to ensure records were being maintained by the authority for officers on the Council's computer folders.
- 5.7 Six officers had been authorised in accordance with evidence of their qualifications, training and experience. The remaining four officers had been given powers which they did not require in practice and were not qualified to exercise. Authorisations had been signed by an officer with the delegated authority and included all of the key legislation required for the delivery of the range of official food controls.
- 5.8 Academic and other relevant qualifications were available for all but one officer and there was evidence for all but two officers that they had received the minimum 10 hours of CPD required by the Food Law Code of Practice and the authority's own policies in keeping with their duties. Further, all officers had received the necessary training to deliver the technical aspects of the work for which they are involved.

Recommendations

- 5.9 The Service should
- (i) Ensure an appropriate number of authorised officers are appointed to deliver food hygiene and food standards official controls in accordance with the Food Law Code of Practice. Ensure the level of authorisation of officers is consistent with qualifications, training and experience in all cases. [The Standard – 5.3]
 - (ii) Ensure all authorised officers meet the training requirements set out in the Food Law Code of Practice. [The Standard – 5.4]
 - (iii) Maintain records of all relevant training and experience for authorised officers. [The Standard – 5.5]

6 Facilities and Equipment

- 6.1 The authority had the necessary facilities and equipment required for the effective delivery of food hygiene and food standards services, which were appropriately stored and accessible to relevant officers.
- 6.2 A Calibration and Maintenance of Equipment Procedure had been developed. This detailed the arrangements for ensuring that equipment was properly stored and maintained and that thermometers were properly identified, assessed for accuracy and withdrawn from use when found to be faulty. The procedure made reference to testing including in use checks, together with action to be taken where tolerances were exceeded. The tolerances being applied were in accordance with centrally issued guidance.
- 6.3 Officers had been supplied with thermometers, which were being calibrated against each other or the reference thermometer whilst in use and calibrated in a laboratory at least annually. Records relating to calibration were being maintained by the authority.
- 6.4 An examination of records relating to the latest calibration checks confirmed that all were within acceptable tolerances in accordance with the authority's procedure and with regard to centrally issued guidance.
- 6.5 The authority's food databases were capable of providing the information required by the FSA.
- 6.6 The food databases, together with other electronic documents used in connection with food law enforcement services were subject to regular back-up to prevent the loss of data.
- 6.7 The authority had systems in place to ensure business continuity and minimise damage by preventing or reducing the impact of security incidents. In respect of food law enforcement services, officers had been provided with individual passwords and access for entering and deleting data had been restricted on an individual basis. Data input protocols were also in place and any issues were discussed during team meetings in order to achieve consistency.

7 Food Establishments Interventions and Inspections

Food Hygiene

- 7.1 In 2015/2016 the authority reported through LAEMS that of the 6065 food businesses within its area 76.63% of food establishments due to be inspected had been inspected. All category A establishments due had received an inspection. Furthermore, 87.57% of food businesses were 'broadly compliant' with food hygiene legislation. This was a slight decrease from 88.17% in the previous year.
- 7.2 The Service provided data prior to the audit which confirmed there were 5934 food businesses on the authority's food hygiene establishment database. 156 establishments were recognised by the Service as being unrated. Information provided during the audit indicated that the Service had adopted a mostly risk-based approach to managing its food hygiene intervention programme. At the time of the audit, 653 establishments were overdue for intervention in accordance with the code of practice; of which 194 were classed as higher risk (Category C) and 459 were classed as lower risk.
- 7.3 The Service had developed documented procedures aimed at establishing a uniform approach to carrying out food hygiene interventions. Procedures were also in place for interventions at approved establishments. An examination of these procedures confirmed that all were generally in accordance with the requirements of the Food Law Code of Practice and relevant centrally issued guidance. Auditors discussed the benefit of including details regarding specific information in relation to red flagging. Further, the Service would benefit from including details in relation to the notification of Primary, Home or Originating authorities following the conclusion of interventions.
- 7.4 A food hygiene inspection aide-memoire had been developed by the Service to assist officers with inspecting food establishments and to ensure that a thorough record of visits was recorded on file. Auditors noted that the aide-memoire would benefit from a section relating to checks for inland imported foods.
- 7.5 During the audit, an examination of records relating to 10 food establishments was undertaken. Auditors confirmed that, in recent years, all but two establishments had been inspected at the frequencies required

by the Food Law Code of Practice. However, in the remaining cases, two category C rated establishments had been overdue an intervention by between two and five months. The Food Law Code of Practice requires that interventions take place within 28 days of their due date.

- 7.6 Inspection records were available and legible for all food establishments audited and in nine cases, sufficient information had been captured to enable auditors to verify the size, scale and scope of the business operations. In the remaining case, insufficient evidence had been documented in relation to the scale of an operation undertaken at a particular food establishment.
- 7.7 The level of detail recorded on aide-memoires was appropriate to verify that thorough assessments of business compliance with requirements relating to Hazard Analysis Critical Control Point (HACCP) had taken place in all but one case. In the remaining case, auditors noted that an overall assessment of the effectiveness of the HACCP system had been made but all aspects of the establishment's HACCP had not been fully considered.
- 7.8 In all but one case, auditors were able to confirm that officers had fully retained the core elements of the business' HACCP plan on file. In the remaining case, omissions related to the level of detail recorded at a single process step.
- 7.9 In all cases, inspection records confirmed that officers had undertaken an appropriate assessment of the effectiveness of cross contamination controls in accordance with centrally issued guidance.
- 7.10 Auditors were able to confirm that, in all relevant cases, information on food hygiene training undertaken by employees had been captured by officers and in all but one case, discussions with food handlers responsible for monitoring and undertaking corrective actions at critical control points had been documented. In the remaining case, although members of staff had been spoken to, auditors were unable to verify whether discussions had occurred with a food handler.
- 7.11 Where appropriate, supplier and customer information in relation to traceability was recorded in all cases and in all but one case an assessment of imported foods being handled had been made. However,

auditors were unable to confirm in all cases whether the Health / Identification marks of incoming goods had been considered.

- 7.12 Auditors were able to confirm that appropriate action had taken place to follow up matters identified during previous interventions in all but one case. In the remaining case, limited information was available on the record to demonstrate that the source of the problem had been adequately addressed and documented.
- 7.13 The risk ratings applied to establishments were consistent with the inspection findings in eight cases. However, in one remaining case, auditors noted that, information on the file relating to follow up activity, was not consistent with the “broadly compliant” risk rating awarded. In the other case, auditors noted that the, issues identified by the officer did not reflect the establishment’s compliance with hygiene procedures or confidence in management/control procedures score.
- 7.14 Auditors where able to confirm that appropriate action had been taken in light of the most recent inspection findings in all but two cases. In one of the remaining cases, auditors were unable to confirm whether appropriate action had been taken with regards to controls at Critical Control Points. In the other case, no evidence of a revisit was available where this was indicated as necessary.
- 7.15 The Service informed the FSA prior to the audit that there were 17 approved establishments in its area, of which the records relating to six were examined.
- 7.16 Two of the establishments were approved by Bridgend Council and information on the process of approval has been reported in that authority’s full audit report. Of the remaining four establishments, in two cases, auditors were able to confirm that the respective authority had followed the appropriate process of issuing approvals to establishments. Of the remaining cases, it was noted that the approval process took place before the creation of the combined service in both cases. In one of these cases, auditors noted that conditional approval had exceeded the statutory six month period and in the other case, full approval had been granted whilst the establishments HACCP had not been fully validated.
- 7.17 In all but two cases, the authority had not stipulated any arrangements, conditions or derogation in relation to the full approval of the

establishment. In one of the remaining cases, auditors were unable to verify whether arrangements were in place, as the notification was not available, whilst in the other case the authority had specified a condition which limited the approved establishment to sourcing raw ingredients from a co-located cutting plant.

- 7.18 Auditors were able to confirm in four out of six cases that recent inspections at the establishment had been undertaken at the frequency required by the Food Law Code of Practice by correctly authorised officers. In the remaining cases, two C rated establishments had been subject to an intervention between three and eight months after its due date. The Food Law Code of Practice requires that interventions take place within 28 days of their due date.
- 7.19 Inspection records were available and legible for the six food establishments audited and sufficient information had been captured to enable auditors to verify that officers had considered the size, scale and scope of the business operations in five cases. In the remaining case, this information had not been captured by the officer on the inspection aide-memoir.
- 7.20 Information captured on aide-memoires during the most recent inspections of approved establishments was sufficient to confirm that full scope inspections had taken place and that officers had undertaken thorough assessments of business compliance with food hygiene requirements in two cases. In three cases, insufficient information regarding product specific requirements had been documented and in one case, a single element of an establishment's production steps had not been assessed.
- 7.21 Auditors were able to confirm that officers had assessed the use of health marks and commercial documents by the business in two cases. Additionally, in four applicable cases, auditors were unable to verify that identification / health marks of raw materials had been adequately assessed.
- 7.22 Auditors were able to confirm that in five cases, an adequate assessment of training and discussions with food handlers other than the food business operator had taken place. In the remaining case, insufficient

evidence had been documented to allow auditors to verify that these checks had taken place.

- 7.23 In all cases the risk ratings that had been applied to approved establishments were consistent with the inspection findings.
- 7.24 The Service had developed an Alternative Food Safety Intervention procedure which detailed its approach to both category D and E rated premises in accordance with the requirements of the Food Law Code of Practice. Auditors discussed the benefit of including its approach to businesses that do not respond to AES self-assessment questionnaires in E rated establishments.
- 7.25 Prior to the audit the authority provided a list of AES activity that had been undertaken. A total of 10 files were selected for examination.
- 7.26 In all cases, evidence was available to show that an initial primary inspection to conduct a risk rating assessment had been undertaken by an appropriately qualified officer. All selected premises had been rated as category E and were eligible for AES.
- 7.27 A combination of either a self-assessment postal questionnaires or a site visit to gather information were used as an AES in all cases examined. All interventions were recorded as AES activity on the authority's database and evidence was available to demonstrate that information used for the purposes of AES had either been collected or reviewed on receipt by an appropriately authorised and qualified officer.
- 7.28 In nine cases, auditors noted that there were no significant changes documented in business activity requiring further action of the authority. In the remaining case, auditors were unable to verify that where a self-assessment indicated that the food business operator and activities had changed, whether the establishment had been identified as requiring an intervention.
- 7.29 In five out of 10 AES interventions, auditors were able to confirm that they had been undertaken in line with the frequencies prescribed within the Food Law Code of Practice. In the remaining cases, auditors noted that interventions had occurred between two months and eight months after their due date.

Recommendations

- 7.30 The Service should:
- (i) Ensure that food hygiene interventions/inspections are carried out at the minimum frequency specified by the Food Law Code of Practice. [The Standard -7.1]
 - (ii) Carry out food hygiene interventions / inspections and approve and register establishments in accordance with the Food Law Code of Practice, centrally issued guidance and its procedures. In particular, ensure that, where applicable, intervention risk rating is undertaken consistently and the alternative enforcement scheme is carried out in accordance with the Food Law Code of Practice, centrally issued guidance, and local procedures. [The Standard – 7.2]
 - (iii) Fully assess the compliance of establishments in its area to the legally prescribed standards and take appropriate action on any non-compliance found, in accordance with its enforcement policy. [The Standard -7.3]
 - (iv) Ensure that the documented procedures for interventions are reviewed to include reference to the local arrangements for red flagging, timescales for revisits and a direction to officers as to whether to take samples. Additionally, amend the Alternative Food Safety Intervention Procedure, to advise on action to be taken with unresponsive businesses. [The Standard 7.4]
 - (v) Ensure that observations made and/or data obtained in the course of a food hygiene intervention/inspection are recorded in a timely manner to prevent the loss of relevant information. [The Standard – 7.5]

Verification Visits to Food Establishments

- 7.31 During the audit, verification visits were made to two food establishments with authorised officers of the authority who had carried out the last food hygiene inspections. The main objective of the visits was to consider the

effectiveness of the authority's assessment of food business compliance with food law requirements.

- 7.32 The officers were knowledgeable about the businesses and demonstrated an appropriate understanding of the food safety risks associated with the activities at each establishment. The officers demonstrated that they had carried out a detailed inspection and had appropriately assessed compliance with legal requirements and centrally issued guidance, and were offering helpful advice to the food business operators.

Port Health

- 7.33 Specialist officers within the Food and Port Health teams were responsible for the inspection of vessels / aircraft docking /landing at the Ports of Cardiff and Barry and Cardiff Airport and issuing sanitation certificates.
- 7.34 The Service had set up a comprehensive procedure for the administration of sanitation certificates in accordance with the International Health Regulations 2005. The authority was undertaking imported food checks on food not of animal origin through advance submission and review of vessel manifests.
- 7.35 Nine vessel files were checked comprising of two sanitation checks and seven boarding checks.
- 7.36 In relation to Ship Sanitation inspections, auditors were unable to verify in both cases, that the authority had fully undertaken an intervention in accordance with centrally issued guidance. Further, auditors were unable to verify that on discovery of a significant issue on a ship registered in a third country, whether the FSA had been notified of the issue in order to liaise with competent authorities in the relevant country.
- 7.37 In relation to boarding checks, auditors were able to confirm that these had been conducted in accordance with centrally issued guidance in all but one case. In the remaining case, where a Sanitation Control certificate had been issued, auditors noted that the certificate had not been completed in line with the authority's procedure.
- 7.38 In all cases, there was evidence that the reports of interventions had been communicated to the Master. However auditors were unable to verify in all but two cases whether the purpose of the inspection had been clearly

communicated. Further, reports did not consistently provide all provisions as required by centrally issued guidance, specifically the build date of the ship, samples taken by the officer and the officer's designation.

- 7.39 Auditors were unable to verify that a report had been provided to both the owner of the ship or the shipping company and /or home authority in all cases.

Recommendations

- 7.40 The Service should:
- (i) Carry out ship inspections in accordance with the Food Law Code of Practice, centrally issued guidance and its procedures. In particular, ensure that, inspection reports and ship exemption certificates are completed in line with its procedures. [The Standard – 7.2]
 - (ii) Fully assess the compliance of establishments in its area to the legally prescribed standards. [The Standard -7.3]

Food Standards

- 7.41 In 2015/16 the Service had reported through LAEMS that 46.9% of A-C rated food businesses due to be inspected had been inspected. This was a decrease of 22.1% from 69% in the previous year.
- 7.42 Data provided prior to the audit confirmed there were 6887 food businesses on the authority's food standards establishment database. 766 of these establishments were recognised by the Service as being unrated whilst 1251 of these establishments were identified as low risk, with a category C rating but had not received an inspection based rating. A further 311 premises had been placed outside of the programme. It was recognised that many of these unrated establishments or those outside of the programme required an inspection in accordance with the Food Law Code of Practice. There were also a total of 804 food establishments that were overdue a food standards intervention, of which, 4 were high risk, 372 were medium-risk and 428 were low-risk. Whilst it was recognised that the authority was attempting to implement a risk based approach to

interventions, auditors were unable to conclude that this was currently being achieved.

- 7.43 The Service had developed a food standards inspection and revisit procedure which set out its approach to existing food establishments. Auditors discussed that the procedure would benefit from review to include specific details in relation to the local arrangements for recording significant breaches and the timescales for follow-up, details around announced / unannounced inspections and the approach to dealing with new food business inspections.
- 7.44 The procedures included a selection of template documents and aides memoir that covered manufacturing premises, hygiene officer's hazard spotting checklists and a report of an inspection form. Auditors discussed that template documents would benefit from a specific template for food standards interventions in non-manufacturing premises to assist officers in undertaking a full scope inspection in accordance with the Food Law Code of Practice. The template forms used contained sufficient fields to facilitate the capture of observations made and/or data obtained in undertaking a full scope assessment of business compliance with requirements relevant to food standards.
- 7.45 Ten food standards interventions were selected for audit. Audit checks were undertaken on records held on the Service's database and in hardcopy for the food establishments reported to have been subject to food standards inspections.
- 7.46 Records relating to the latest inspection were retrievable in eight cases, in the remaining two cases, relating to interventions in manufacturing establishments, no inspection record was available despite a visit date and risk rating being applied to the establishment. Of the remaining eight cases, auditors were able to confirm that interventions had been undertaken at the correct frequency in one case. In six of the remaining cases no previous risk rating data was available in accordance with Annex 5 of the Food Law Code of Practice and as such, an assessment could not be made. In the final case, the last intervention at a medium risk establishment was overdue by 3 months.
- 7.47 In the eight cases where latest inspection records were retrievable, these were legible and officer's observations had been captured using a range

of different forms and aide-memoires. One inspection record was recorded on the current food standards inspection aide-memoire whilst the remaining inspections pre-dated the latest procedure and were recorded on a range of different forms from each individual partner local authority.

- 7.48 Auditors were able to confirm that officers had captured the size, scale and scope of the business in four cases, whilst in the remaining four cases insufficient information was recorded to demonstrate the size or scale of the operations carried out. In all cases auditors were able to establish the type of activity undertaken.
- 7.49 Auditors noted that in the one case where the new procedural template forms had been used, sufficient detail was recorded to show that a thorough assessment of food standards requirements had taken place. Auditors discussed that the new procedure and accompanying template forms would assist in achieving compliance in these areas moving forward. In all remaining cases further information was required to demonstrate full assessments in accordance with the Food Law Code of Practice had been undertaken by officers.
- 7.50 In cases which were subject to previous interventions and enforcement action, evidence was available to confirm that appropriate action had been taken to assess the current standards of compliance during the most recent intervention.
- 7.51 In six cases, risk ratings applied were consistent with the officer's findings and in accordance with the Food Law Code of Practice. In the remaining two cases food establishments had been risk rated using a non-food specific scheme which was not in accordance with the Food Law Code of Practice. In a separate case auditors noted that a risk rating score had not been recalculated by the database and as such was displaying incorrectly.
- 7.52 In respect of the most recent inspections, auditors were able to verify that appropriate action had been taken in light of inspection findings and where records indicated that follow-up action was required, evidence was available to confirm this had taken place.
- 7.53 Auditors were able to confirm that, in all cases, interventions were carried out on an unannounced basis.

7.54 Information provided prior to the audit suggested that the authority was operating an Alternative Enforcement Strategy for low risk establishments. Ten files were selected for audit, auditors established that all files were coded as inspections and were based on visits undertaken for food hygiene or were new business assessments. It was established that the authority was not operating an Alternative Enforcement Strategy in accordance with the Food Law Code of Practice. Auditors noted that insufficient information was being gathered to justify application or revision of a risk rating. However, contrary to the Food Law Code of Practice, risk ratings were being allocated following these visits by an officer other than the inspecting officer.

Recommendations

- 7.55 The Service should:
- (i) Ensure that food standards interventions/inspections are carried out at the minimum frequency specified by the Food Law Code of Practice. [The Standard -7.1]
 - (ii) Carry out food standards interventions/inspections in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard - 7.2]
 - (iii) Assess the compliance of establishments in its area to the legally prescribed standards [The Standard – 7.3]
 - (iv) Review, amend and implement the food standards inspection procedure to include information related to the recording of significant breaches, timeframes for follow-up action and the approach to dealing with new business inspections to ensure the procedure is in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard 7.4]
 - (v) Ensure that observations made and/or data obtained in the course of a food standards intervention/inspection are recorded in a timely manner to prevent the loss of relevant information. [The Standard – 7.5]

Verification Visit to Food Establishment

- 7.56 Verification visits were undertaken at two food establishments with the authorised officer of the authority who had carried out the most recent food standards inspection. The main objective of the visits was to consider the effectiveness of the authority's assessment of the systems within the business for ensuring that food meets the requirements of food standards law.
- 7.57 Officers were able to demonstrate their knowledge of the businesses and provide auditors with an assurance that assessments of food standards controls had taken place as part of the inspections in both cases.

8 Food and Food Establishments Complaints

- 8.1 The Service had developed separate procedures for food hygiene and food standards which outlined the criteria for investigations and were in accordance with the Food Law Code of Practice and centrally issued guidance.

Food Hygiene

- 8.2 An examination of the records relating to 10 food hygiene complaints received by the Service was undertaken. Auditors established that all complaints had been actioned in a timely manner and within the target response times set out in the database.
- 8.3 Auditors were able to establish that, an appropriate investigation had taken place in all but one case. In the remaining case, auditors were unable to fully confirm the officer's rationale for failing to visit or undertake further action at the establishment subject to the complaint. Also, in all but one case, auditors were able to confirm that appropriate action had been taken based on the findings of the investigation. In the remaining case, auditors were unable to find evidence of a revisit to check on an establishment's ongoing compliance with statutory requirements.
- 8.4 Evidence was available to show that complainants had been informed of the outcome of the investigation in all but one case.

Food Standards

- 8.5 An examination of the records relating to 10 food standards complaints received by the Service was undertaken. In eight cases auditors established that complaints had been thoroughly investigated. However, in two cases information relating to the complaint investigation was not retrievable. Furthermore, auditors identified that in seven cases, where necessary, appropriate follow up action had been taken. The remaining cases related to the above missing records along with another case where follow-up action taken in relation to a complaint was not recorded where a premise had temporarily closed during the investigation.
- 8.6 In five cases complaints had been investigated within a timely manner and evidence was available to demonstrate that the outcome of the investigation had been communicated to the complainant. The remaining

cases related to records not being retrievable and initial contact with the complainant being outside of the timescales set by the Service's own procedure.

Recommendations

- 8.7 The Service should:
- (i) Ensure that food hygiene and food standards complaints or service requests are investigated in accordance with the Food Law Code of Practice, centrally issued guidance and the Service's procedure. [The Standard 8.2]

9 Primary Authority Scheme and Home Authority Principle

- 9.1 The Service's commitment to the Primary Authority Scheme and Home Authority Principle was set-out in its Service Plan, Enforcement Policy and Primary Authority procedure.
- 9.2 Auditors were advised that food law enforcement officers had been provided with passwords to enable them to access the Primary Authority website.
- 9.3 Primary and Home authority considerations had been included in some other work procedures, for example, food hygiene interventions procedures, sampling policy & procedure, incidents procedures and complaints procedures.
- 9.4 The Service had 13 Primary Authority agreements in place and auditors were able to verify that, in its capacity as an enforcing authority, it had regard to Primary Authority guidance but had not always followed up matters of concern with primary authorities as appropriate.
- 9.5 The Service had no formal Home Authority arrangements in place but remained responsible for many manufacturers / distributors as an originating authority. Records examined during the audit demonstrated that accurate and timely advice had been provided to businesses, and that it had responded appropriately to requests for information from other local authorities.

Recommendations

- 9.6 The Service should:
- (i) Ensure it liaises with the Primary authorities in relation to offences identified from unsatisfactory food hygiene sample results. [The Standard – 9.1]

10 Advice to Business

10.1 The Service had been proactive in providing food hygiene and food standards advice to businesses. There was evidence that advice had been provided during interventions, as well as on request, both in writing and over the phone and also by visit if the business had not yet opened.

10.2 Information was also available on the Service's website to assist local businesses in relation to food services, as follows:

Advice on starting new food business,
Food Complaints
Food Standards inspections,
Allergy advice and guidance,
Food Hygiene Inspections,
Food Hygiene advice visits,
Food Safety Management including advice on own compliance packs
and FSM systems,
Food Premises Approval,
Food Premises Registration,
Event Catering with various advice leaflets,
Food Sampling,
Food Hygiene Training Courses,
Healthy Options Award Scheme,
Investigation of Food Poisoning & Food Borne Disease with leaflets,
Links to Public Health Wales,
Links to Business Companion for food standards law advice,
Links to food hygiene law.

10.3 In addition, a number of projects to advise businesses had been undertaken:

- Listeria advice mailshots to care establishments,
- Mailshots to home caterers and other catering establishments on FHRS new rules,
- E.coli advice letter sent to 570 high risk category A-C premises,
- New business leaflet developed that includes advice on registration, FHRS & allergen requirements.

11 Food Establishments Database

- 11.1 The Service has a documented procedure for the maintenance of the food hygiene and food standards databases. Information to update the databases is gathered from food business operators, inspection activity, licensing and planning applications, local district knowledge / observations and for part of the service, other Council departments.
- 11.2 Auditors selected 10 food establishments located in the region from the Internet. All but one of those still trading had been included on the authority's database. All those on the database had been included in the food inspection programmes.
- 11.3 Analysis of the food standards database showed errors relating to intervention risk ratings and due inspection dates, some of which will be addressed with migration to the new database. Some establishments had been visited and risk rated by an officer other than the inspecting officer following limited inspection activity whilst being coded as a full scope inspection on the database. Further, 1251 establishments were identified with a category C low risk rating without any other evidence of an associated inspecting officer, a risk profile or the last date of inspection. Analysis of the food hygiene database showed some errors relating to a small number of food hygiene risk ratings and a significant number of due intervention dates for lower risk food hygiene establishments. Some of the database anomalies had the potential to affect the annual enforcement monitoring return to the FSA.
- 11.4 Audits of enforcement actions indicated the use of more than one database code for voluntary surrenders. This had the potential to affect the annual enforcement monitoring return to the FSA.

Recommendations

11.5 The Service should:

- (i) Ensure risk rating data, due inspection dates for both food hygiene and food standards and food hygiene enforcement data are correctly entered and accurately maintained on the Service's database. Also ensure that only those establishments that have received a food standards inspection are rated as such on the database whilst only those subject to an alternative intervention are coded accordingly. [The Standard – 11.1]

Fully implement its documented procedures for ensuring its database is accurate, reliable and up to date at all times. [The Standard – 11.2]
- (ii)

12 Food Inspection and Sampling

- 12.1 The Service Plan contained aims and objectives that made specific reference to the monitoring and sampling of food to verify compliance with statutory requirements.
- 12.2 Programmes for the microbiological examination and chemical analysis of food had been developed and implemented. Both had regard to national and regional priorities and included an estimate of the number of samples that would be taken in 2016/17. In addition to funding its own sampling programme, the Service had benefited from FSA grant funding for food standards samples.
- 12.3 A combined policy / procedure had been developed by the Service for the microbiological analysis of food by the food hygiene service. Auditors identified that the document would benefit from review to include information relating to out of hours arrangements, information relating to imported food sampling and details on the different methods of sampling. Auditors also discussed that the procedure would benefit from further information relating to local arrangements for the use of data loggers in recording temperature control of samples.
- 12.4 A procedure had been developed by the Service for the chemical analysis of foods within the food standards service. However, auditors identified that the procedure would benefit from review to include information relating to out-of-hours arrangements, information relating to imported food sampling, details on the different methods of sampling, equipment required to undertake sampling and detail on how the procedure links with the food alert procedure.
- 12.5 The Service had appointed a Public Analyst for carrying out chemical analyses of food and had a formal agreement in place with Public Health Wales for the microbiological examination of food. The laboratories were both on the recognised list of UK designated Official Laboratories.

Food Hygiene

- 12.6 Audit checks of records relating to 10 samples submitted for microbiological examination were undertaken; of which seven had been notified as being unsatisfactory, two as borderline and one as satisfactory.

- 12.7 In four cases auditors noted that appropriate action had been taken by the Service. In the remaining cases, evidence of appropriate follow-up action was not available.
- 12.8 Auditors were able to confirm that businesses had been informed of the result in all but two cases. Also in two cases, auditors were unable to verify that a business's Primary Authority had been informed.

Food Standards

- 12.9 An examination of the records relating to 10 satisfactory food standards samples was undertaken. Auditors were able to confirm in all cases that samples had been appropriately procured by trained and authorised officers. Sample results were available in nine cases; in the remaining file no certificate of analysis or result notification could be located.
- 12.10 Auditors were able to confirm that sampling had been appropriately undertaken and where relevant appropriately follow-up in accordance with the Food Law Code of Practice in all cases.
- 12.11 Furthermore, in all cases evidence was available to show that relevant parties had been notified of results and that Primary, Home or Originating authority considerations had been undertaken.

Recommendations

12.12 The Service should:

- (i) Review and amend its sampling policy for the microbiological examination and chemical analysis of food in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 12.4]
- (ii) Review and amend its documented procedures for microbiological sampling and chemical analysis of foods in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 12.5]
- (iii) Ensure that businesses are informed of unsatisfactory food hygiene sample results in accordance with its documented policy and procedure. [The Standards – 12.6]
- (iv) Take appropriate action in accordance with its Enforcement Policy where food hygiene sample results are not considered to be satisfactory. [The Standard – 12.7]

13 Control and Investigation of Outbreaks and Food Related Infectious Disease

- 13.1 The Service had identified a lead officer for communicable disease along with other designated officers to assist in investigation and assessment of notifications received by the authority.
- 13.2 A procedure for investigating and managing outbreaks of communicable disease was provided.

Good Practice – Procedure for investigation and management of outbreaks of communicable disease

This procedure included criteria for triggering an outbreak, template documents and a link to the Wales Outbreak Plan, along with an additional procedure for cases of food poisoning.

The Wales Outbreak Plan had been produced by a multi-agency group, including Public Health Wales and Welsh Government. Auditors noted that the plan had been localised to include relevant contact details for neighbouring local authorities and other agencies that have a role in the control of outbreaks.

- 13.3 A procedure for the notification and investigation of sporadic cases of communicable disease was also provided, containing the process for administering and investigating notifications, the storage and protection of records and including reference to centrally issued guidance along with an additional procedure for cases of food poisoning. A suite of nine organism specific advice leaflets had also been produced and were issued to all cases of notification.

Good Practice – Links to food establishments

The Service was actively monitoring links to food establishments and was working to characterise risk factors in linked food establishments to assist with the future identification of causes of food borne infectious disease.

Good Practice – Investigation and identification of Campylobacter clusters

The Service response to cases of Campylobacter and its application of surveillance is more likely to identify clusters of this food borne infectious disease, allowing the sources and the causes of those clusters to be addressed.

- 13.4 The Service had arrangements in place for responding to notifications of food related infectious disease received outside normal working hours involving contact with an appropriately qualified officer. The arrangements were not tested as part of the audit.
- 13.5 Notifications relating to two outbreaks of suspected food poisoning and eight sporadic cases of food related infectious diseases were selected for audit. Thorough and timely investigations had been carried out in accordance with the Service's procedures and target response times by authorised officers who were suitably qualified and competent and records were easily retrievable. In relation to the outbreaks, auditors confirmed that the service was also represented on all appropriate incident management meetings.
- 13.6 Appropriate investigation and necessary follow-up actions were clearly recorded in accordance with the Food Law Code of Practice, centrally issued guidance and the Service's procedures. Records relating to the control and investigation of food related infectious disease were being retained by the authority for at least six years.

14 Food Safety Incidents

- 14.1 The Service had developed a food alerts procedure for dealing with incidents and food alerts which also referred to food incidents and alerts arising from within the area.
- 14.2 Auditors were able to verify that a sample of three recent food alerts for action notified to the Service by the Agency had been received and actioned as appropriate in accordance with the instructions issued by the FSA.
- 14.3 Auditors were able to verify that the Service was aware of the requirement to notify the FSA of any serious localised and non-localised food hazards arising locally.
- 14.4 Action taken by the Service had been documented and correspondence, including officer e-mails relating to food alerts, had been maintained.

15 Enforcement

- 15.1 The Service had developed a Compliance and Enforcement Policy which had been updated and approved by the SRS Joint Committee. This was supplemented by a Food Safety Enforcement annex which had recently been approved. At the time of the audit the policy had not yet been published on the service's website but was available to the public and food businesses on request.
- 15.2 The policy and its annex advocated a graduated approach to enforcement and the content was in accordance with the Food Law Code of Practice and other official guidance. Some criteria for the taking of informal action, voluntary procedures, issuing Simple Cautions and bringing prosecutions were provided within the Policy whilst some criteria for the taking of informal action, the service of statutory notices and voluntary procedures were provided in the Annex. The Policy also referred to the Primary and Home Authority principles and set-out the approach to enforcement where the local authorities covered by the Service hold an interest.
- 15.3 Procedures for the withdrawal and suspension of approvals was contained within the approval intervention procedure. However, the arrangements for taking action in relation to non-compliant imported foods identified during inland checks had not been documented. The Service had adopted some documentation for officers to complete when compiling a file for prosecution or Simple Caution but no procedure for this process had been documented. The enforcement agreement checklist would benefit from amendment to include a section for the documentation of decisions against Compliance and Enforcement Policy criteria.
- 15.4 The Service had partially documented its procedures for the remaining enforcement actions within the food safety annex to its enforcement policy. The information that was included was in accordance with the Food Law Code of Practice, centrally issued guidance and applicable legislation. These procedures did not include information in relation to local arrangements for the drafting and service of the various statutory notices such as indicating which templates or method of service should be used. Further the procedure for Improvement Notices would benefit from updating to include details in respect of food information requirements, whilst the procedures for Remedial Action Notices (RANs)

and prohibition notices (including voluntary agreements) should include arrangements for monitoring compliance. The prohibition procedures should also include details of the process of applying to the local Magistrates' Courts for a Hygiene Emergency Prohibition Order or Prohibition Order. Detention, seizure, Regulation 27 certification and voluntary surrender procedures also required revision to include the local arrangements for bringing foods before a Justice of the Peace and the destruction and disposal of food.

15.5 During the audit, an examination of database records indicated 21 establishments had received a 0 (Urgent Improvement Necessary) rating under the Food Hygiene Rating Scheme (FHRS), 14 of which had either been subject to formal enforcement action or voluntary procedures to remedy the contraventions identified. Whilst the remaining seven establishments had been issued with written warning letters, formal enforcement action or voluntary procedures had not been instigated in accordance with the Compliance and Enforcement Policy. Where serious breaches of food law are identified, the Service should ensure a reasonable, proportionate and risk-based approach is taken to enforcement in accordance with the Compliance and Enforcement Policy and the Food Law Code of Practice. Departures from the policy should be exceptional and the reasons for any departure should be recorded.

15.6 The Service had reported that the following formal enforcement actions had been undertaken in the two years prior to the audit:

- 3 Revocation / withdrawal of approval;
- 115 Hygiene Improvement Notices (HINs);
- 22 Remedial Action Notices (RANs);
- 25 Fixed Penalty Notices for non-display of FHRS rating;
- 36 voluntary closures;
- 11 Food Detention Notices;
- 11 Food seizures;
- 11 Voluntary surrenders of food;
- 8 prosecution decisions

15.7 10 Hygiene Improvement Notices (HINs) and associated records were selected for audit. In all cases, the service of HINs had been an appropriate course of action, the details of the contraventions identified and the measures to be taken to achieve compliance had been specified.

- 15.8 There was evidence available to confirm the method of service for eight of the HINs. In one of these cases, the notice had been returned to the sender and therefore auditors were unable to verify whether the food business operator had received the notice. Auditors were unable to confirm that two of the HINs had been duly served, as proof of service was not available.
- 15.9 Further, in respect of seven cases where HINs had been served, auditors were able to verify that timely checks on compliance had taken place. In one case, establishment records did not contain sufficient information to demonstrate that a revisit to check compliance with the notice had been undertaken. Whilst there was evidence to confirm checks on compliance in the remaining two cases, these had taken place three weeks and four weeks following the expiration date. The reason for the delays had not been recorded.
- 15.10 Appropriate follow-up action had taken place in all but two cases. In one case, the notice had been confirmed as complied despite there still being statutory non-compliance for the same reasons. In the remaining case, although a check on compliance had occurred within five days of the expiry of the notice, auditors noted that the food business operator had been given an additional week to comply contrary to the Food Law Code of Practice. No reason was documented for this deviation.
- 15.11 In all but three cases where HINs had been complied with, a letter had been sent to the food business operator confirming compliance. In two of these cases, auditors were unable to locate evidence on the establishment file and in the third case, the letter had not been sent to the food business operator's central business address.
- 15.12 Audit checks of 10 RANs and associated records confirmed that in all cases, the notice had been served by an appropriately authorised officer who had witnessed the contravention. The action taken in each case was appropriate and the notice clearly specified the nature of the breach, the reason for service and measures to be taken to remedy the contravention. In all but one case, correct information on legislative requirements was provided. In that case an incorrect legal reference was specified.

- 15.13 There was evidence of proper service in one of the cases and auditors were able to verify that food business operators had been provided with the necessary information relating to appeal provisions in all cases. However, in one case the details of the local Court had not been provided.
- 15.14 In one case there was evidence that a timely check on compliance had been carried out but the notice remained in force following that check and no subsequent visit had taken place. In seven cases, the notices had been withdrawn in writing when compliance was achieved although in one case it was six months late and in another case, it was unclear whether the withdrawal was justified due to a lack of information on the file.
- 15.15 Auditors examined records of 10 voluntary closure agreements which had been instigated by the Service. In all but one case, auditors were able to verify that the circumstances had warranted voluntary closure and that agreements had been confirmed with the food business operator in writing. However, appropriate and timely checks to ensure the food businesses remained closed had not taken place in seven of the cases.
- 15.16 In 10 cases where food had been subject to a voluntary surrender, auditors were able to confirm that the action taken had been appropriate and in all but one case, the receipts for the voluntarily surrendered food had been signed by the officer and counter signed by the person surrendering the food. In the remaining case, the voluntary surrender agreement was not available.
- 15.17 In four cases, where foods had been destroyed on site, auditors were able to confirm the time and place of destruction in all cases. However, in three cases, details relating to how the food had been dealt with, i.e. disfigured or stained, to prevent it from re-entering the food chain had not been recorded.
- 15.18 In seven cases where foods were surrendered to the Service for destruction, there was no record of destruction.
- 15.19 Auditors examined case files relating to one food standards prosecution and six food hygiene prosecutions; all of which had been brought before the Courts. There had been no Simple Cautions issued by the service.

15.20 Prosecution had been the appropriate course of action in each case and they had generally been authorised by an officer with the appropriate delegated authority and taken without unnecessary delay. In all but two cases, records were available to verify due consideration had been given to the enforcement policy and in all but one case, records confirmed the Public Interest and Evidence tests were also considered. Where appropriate, schedules of sensitive and unused material had been compiled. However, the roles performed by certain officials in accordance with the Criminal Procedure and Investigation Act had not been documented in all cases.

Recommendations

15.21 The Service should:

- (i) Review, amend and implement its procedures for Hygiene Improvement Notices, Remedial Action Notices, Hygiene Emergency Prohibition Notices, voluntary closure agreements and detention, seizure, Regulation 27 certification and surrender to include details of local arrangements, specifically; drafting (including the use of approved templates), method and record of service. Procedures for Hygiene Improvement Notices, Remedial Action Notices Hygiene Emergency Prohibition Notices, voluntary closure agreements should be amended to include arrangements for monitoring compliance whilst prohibition procedures should also include local legal processes for applying for a Court Order. The procedures for detention, seizure, Regulation 27 certification and surrender should be amended to include local arrangement for condemnation and destruction or disposal of food. [The Standard - 15.2]
- (ii) Set up documented enforcement procedures for follow up and enforcement actions in relation to food information improvement notices, prosecutions, simple cautions and imported food in accordance with the Food Law Code of Practice and official guidance. [The Standard -15.2]
- (iii) Ensure that food law enforcement is carried out in accordance with its procedures, the Food Law Code of Practice, official guidance and centrally issued guidance. [The Standard – 15.2 & 15.3]
- (iv) Ensure its Compliance and Enforcement Policy is fully implemented and the reasons for any departure from the criteria set-out in the Policy are recorded. [The Standard – 15.1 & 15.4]

16 Records and Interventions/Inspections Reports

Food Hygiene

- 16.1 Food business records, including registration forms, inspection aides-memoire, post inspection visit report forms and correspondence were being stored by the Service on its electronic food establishment database. Details of the date and types of intervention undertaken at food establishments, as well as the risk profiles and food hygiene ratings, were also maintained on the system. Information relating to food establishments selected for audit was provided by the Service through access to the database. Where relevant, information relating to the last three inspections was available and records were being retained for six years.
- 16.2 Food registration forms were available on file in nine out of 10 cases. In the remaining case, an officer had requested that the business complete and return an establishment registration form during the most recent inspection. In four of these cases registration forms were date stamped in line with the local procedure.
- 16.3 With regards to approved establishment files, auditors were able to verify that the Service had retained the establishment's notification of full approval on file in five cases. In the remaining case, the authority was unable to retrieve the notification document.
- 16.4 In all cases, approved establishment files contained management and key contact names and contact details, copy of the establishment's emergency withdrawal/recall procedures, customer and supplier lists, product lists and HACCP documentation. The remainder of the information required in Annex 10 of the Food Law Practice Guidance, such as establishment synopsis was mostly available with the exception of some minor information in isolated cases. Establishment files for approved premises would benefit from a review against the documents required by Annex 10 to ensure that all required information is available, retrievable and up to date in all cases.
- 16.5 The Service was providing 'a report of an inspection' notification post inspection, in addition to sending out inspection letters to communicate findings to food businesses. In seven cases, the post-inspection letters and the report of inspection collectively contained all the information required to be provided to food business operators under Annex 6 of the

Food Law Code of Practice. In one case, auditors noted that the business had not been provided a “report of intervention” and as such the post inspection letter did not contain information relating to the type of business inspected, areas inspected, documents examined and samples taken by the officer. In the remaining two cases, the distinction between legal requirements and recommendations was not clear.

- 16.6 In all of the cases examined the latest inspection letters had been sent to businesses within 14 days from the date of the visit, as required by the authority’s procedures and Food Hygiene Rating legislation.

Recommendations

- 16.7 The authority should:
- (i) Maintain up to date accurate records of all food establishments in its area in accordance with the Food Law Code of Practice and centrally issued guidance. These records shall include reports of all interventions / inspections containing all of the information required by Annex 6 of the Food Law Code of Practice, the core elements of HACCP, the determination of compliance with legal requirements made by the authorised officer, details of action taken where non-compliance was identified, the details of any enforcement action taken and for approved establishments, the information required by Annex 10 of the Food Law Code of Practice. [The Standard – 16.1]

Food Standards

- 16.8 The authority had recently implemented a new procedure which required the outcome of inspections being reported to businesses using a food standards inspection report form. However, in all but one of the files checked, inspections had been carried out prior to the new procedure being implemented. Report forms were being maintained electronically on the database which included information relating to intervention activity, including the date, type of intervention undertaken and risk rating for the establishment. The above information was retrievable in all but two cases.

- 16.9 In five cases, food business operators of the establishments selected for audit had been provided with report forms at the conclusion of the most recent inspection at their trading address in accordance with the food law code of practice.
- 16.10 Auditors recognised that the recently introduced Food Standards inspection report form contained all of the information required by Annex 6 of the Food Law Code of Practice; this was available in one file. However, the remaining files contained a range of different report forms and notes which did not consistently contain the all of the relevant information required.
- 16.11 The authority was unable to demonstrate that food standards records were being consistently maintained for at least six years. An issue was identified where establishments had been coded on the database as having received an intervention despite no records of inspection being available or retrievable.

Recommendations

- 16.12 The authority should:
- (i) Maintain up to date accurate records of all food establishments in its area, in accordance with the Food Law Code of Practice and centrally issued guidance. These records shall include reports of all interventions / inspections containing all of the information required by Annex 6 of the Food Law Code of Practice, the determination of compliance with legal requirements made by the authorised officer, sampling results and complaints. The authority should also record, with reasons, any deviations from set procedure. [The Standard – 16.1]
 - (ii) Ensure records are kept for at least 6 years. [The Standard – 16.2]

17 Complaints about the Service

- 17.1 The Service had developed a corporate complaints policy which was available to the public and food businesses on its website.
- 17.2 Complaints were dealt with under a two stage procedure, initially by the relevant service team and then, if the customer was not satisfied, by the Corporate Complaints Team.
- 17.3 Eight complaints against the food hygiene service had been received in the two years prior to the audit. These were all dealt with in accordance with policy.
- 17.4 Auditors noted that the details of a senior officer was provided on food hygiene correspondence should businesses wish to complain following an inspection or other intervention.

18 Liaison with Other Organisations

18.1 The Service had liaison arrangements in place with a number of external groups aimed at ensuring efficient, effective and consistent enforcement. Auditors were able to confirm that the authority had been represented on the following forums for local authority regulatory services:

- All Wales Food Safety Expert Panel,
- South East Wales Food Hygiene Task Group,
- South West Wales Food Hygiene Task Group,
- Glamorgan Food Group,
- Port Health Expert Panel,
- Communicable Disease Expert Panel,
- Communicable Disease Liaison Group,
- South East Wales Communicable Disease Task Group,
- South West Wales Communicable Disease Task Group,
- All Wales Food Standards and Labelling Group,
- Lead Officers Food Hygiene Rating Steering Group,
- Welsh Food Microbiological Forum,
- Wales Heads of Environmental Health Group;
- Wales Heads of Trading Standards Group;
- National Food Hygiene Focus Group.

18.2 Arrangements were also in place to keep informed of the work of the following bodies and liaise with them as appropriate:-

- Food Standards and Labelling Enforcement Group,

18.3 The Service also stated in its service plan that it liaised with the following external organisations:

- Food Standards Agency; including operations division
- professional bodies such as the Chartered Institute of Environmental Health, the Royal Society of Health, the Royal Institute of Public Health and Hygiene, the Chartered Institute of Trading Standards; Public Health Wales, Care Standards Inspectorate for Wales.
- Regulatory Delivery (RD)
- other Council services such as Business Rates, Planning and Building Control to inspect and review applications, Procurement and Schools Service;

- PH Wales Environment Sub Group and the Infection Control Committee and the Cardiff Health Alliance;
- Maritime and Coastguard Agency and stakeholders at the port including port operators;
- Association of Port Health Authorities and the Ports Liaison Network;
- Welsh Government;
- Local Government Data Unit
- Cardiff International Airport and stakeholders at the airport including UK Border Force, airline operators, baggage handlers
- Public Health Wales including Consultants in Communicable Disease Control, microbiologists, laboratories at Llandough, Princess of Wales, Singleton and the Heath
- Hospitals
- Local Health Boards
- Animal and Plant Health Agency
- Centre for Radiation and Chemical & Environmental Hazards
- Crown and Magistrates Courts
- Public analyst laboratories, Minton Treharne and Davies, Cross Hands and Cardiff

18.4 Auditors were able to verify that mechanisms were in place for effectively liaising with internal departments.

19 Internal Monitoring

- 19.1 Internal monitoring is important to ensure performance targets are met, services are being delivered in accordance with legislative requirements, centrally issued guidance and the Service's procedures. It also ensures consistency in service delivery.
- 19.2 A number of key performance indicators had been identified for both food hygiene and food standards work. Quantitative internal monitoring arrangements were in place to monitor performance against the targets, which had been set-out in the service plan. Further monitoring of the progress of intervention programmes is monitored monthly by the Team Managers.
- 19.3 A documented internal monitoring procedure had been developed for the full range of food hygiene and food standards work.
- 19.4 The Team Managers were responsible for internal monitoring of the food enforcement services at an operational level.
- 19.5 Auditors were able to verify that some qualitative internal monitoring had been undertaken across the service including record checks.
- 19.6 Records maintained, in accordance with the procedure, were able to confirm the nature and extent of the monitoring activity. This included accompanied inspections and intervention file record checks for both food hygiene and food standards and food hygiene service requests.
- 19.7 Team meetings were also conducted to feedback and share information on the validation of both the quantity and quality of work.
- 19.8 Officers had attended training to ensure the consistent application of food hygiene risk ratings, in accordance with Annex 5 of the Food Law Code of Practice. It had also recently participated in a national consistency exercise co-ordinated by the FSA.
- 19.9 The records relating to internal monitoring that were available, were being maintained by managers for at least two years.

19.10 In 2016 the Service was subject to an internal audit which reported in September. This identified some areas to focus on but did not address full compliance with the requirements of the Food Law Code of Practice. The results were incorporated into both service planning and internal monitoring processes by the Service.

Recommendation

19.11 The Service should:

(i) Fully implement its documented internal monitoring procedures to include food standards interventions undertaken by all teams, port health interventions, infectious disease investigations, incidents, food standards service requests, AES, and sampling follow ups. [The Standard – 19.1]

(ii) For both food hygiene and food standards services, verify its conformance with the Standard, relevant legislation, the relevant Codes of Practice, centrally issued guidance and the authority's documented policies and procedures. [The Standard – 19.2]

20 Third Party or Peer Review

- 20.1 In January 2014 the authorities making up the service, in common with the other 21 local authorities in Wales, had submitted information in respect of two FSA focused audits - Response of Local Government in Wales to the Recommendations of the Public Inquiry into the September 2005 Outbreak of *E. coli* O157 in South Wales and Local Authority Management of Interventions in Newly Registered Food Businesses. The partner authorities were not audited individually as part of this programme. These focused audit reports are available at:
www.food.gov.uk/enforcement/auditandmonitoring
- 20.2 Each of the three authority's arrangements for responding to emergencies out-of-office hours were tested by the FSA in March 2014. An appropriate response was received.
- 20.3 In March 2013, Bridgend Council was the subject of a full food audit by the Food Standards Agency. A report and action plan was produced and published. The action plan was updated in August 2015 following a follow up visit. In March 2014 Cardiff Council was audited as part of a focussed shellfish traceability and authenticity exercise. Where matters remained outstanding from both of these audits, they have been absorbed into the recommendations within this report.
- 20.4 The Environmental Health functions of the authorities making up the service, which included the food hygiene service and the investigation of food related infectious disease, had been subject to a review by the Wales Audit Office in 2013/14.
- 20.5 The Service also participated in the European Commission Directorate General for Food and Health and Safety's 'Audit in the United Kingdom to evaluate the food safety control systems in place governing the production and placing on the market of fishery products'.

21 Food Safety and Standards Promotion

21.1 The authority had delivered a number of initiatives with the aim of promoting food hygiene and standards. Activities included:

- promotion of the Service's advisory services,
- promotion of the food hygiene rating scheme including the new requirements,
- attendance at Cardiff Food & Drink festival,
- provision of SRS food safety event,
- delivery of food hygiene training,
- production and circulation of the Food and Safety newsletter,
- advice leaflets for students on food and communicable diseases.

Good Practice – Media and Promotion plan

The Service had devised a Media and Promotion Plan to co-ordinate its promotional activity.

21.2 The information available on the authority's website to promote food hygiene and food standards to consumers and other stakeholders Included:

- Advice on starting new food business,
- Food Complaints,
- Food Standards inspections,
- Allergy advice and guidance,
- Food Hygiene Inspections,
- Food Hygiene advice visits,
- Food Safety Management including advice on its own compliance packs and FSM systems,
- Food Premises Approval,
- Food Premises Registration,
- Event Catering with various advice leaflets,
- Food Sampling,
- Food Hygiene Training Courses,
- Healthy Options Award Scheme,
- Investigation of Food Poisoning & Food Borne Disease with leaflets for different agents of infection,
- Links to Public Health Wales,
- Links to Business Companion for food standards law advice,

- Links to food hygiene law.

21.3 Records of promotional activities were being maintained by the lead officers.

Auditors:

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The local authority is in the process of completing an action plan to address the recommendations in this report.

The agreed action plan will be inserted in this section of the report in due course.

Audit Approach/Methodology

The audit was conducted using a variety of approaches and methodologies as follows:

(1) Examination of local authority policies and procedures

The following policies, procedures and linked documents were examined:

- Shared Regulatory Services Business Plan 2016/17
- Shared Regulatory Services – Port Health Service Plan 2016/17
- Shared Regulatory Services – Food and Feed Law Service Plan 2016/17
- Bridgend County Borough Council – Corporate Plan 2016 – 2020
- The City of Cardiff Council – Corporate Plan 2016 – 2018
- Vale of Glamorgan Council – Corporate Plan 2016 – 2020
- The Vale of Glamorgan Council – Food Law Enforcement Service Plan
- Shared Regulatory Services – Document Control Procedure
- Shared Regulatory Services – Authorisation of Officers Procedure
- Shared Regulatory Services – Authorisation Instruction Form
- Shared Regulatory Services – Calibration and Maintenance of Equipment Procedure
- Calibration and Maintenance of Equipment Procedure – CS/FS&PH/P011 – 13 February 2017
- Fridge/Freezer Temperature Monitoring Form
- Shared Regulatory Services – Data and Database Software Management Procedure
- Shared Regulatory Services – Application for Approval of a Food Business Establishment
- Shared Regulatory Services – Notice of Decision to Refuse to Grant Approval
- Shared Regulatory Services – Notice of Decision to Refuse to Grant Full Approval
- Shared Regulatory Services – Notice of Decision to Suspend the Approval
- Shared Regulatory Services – Notice of Decision to Withdraw Approval
- Shared Regulatory Services – Notification of Grant of Full Approval
- Shared Regulatory Services – Approved Premises Inspection Form
- Shared Regulatory Services – Food Hygiene Inspection Form
- Shared Regulatory Services – Specific Additional Inspection Form – Establishments Handling Shell Eggs
- Shared Regulatory Services – Inspection Form for the Specific Food Hygiene Requirements for Establishments Manufacturing Meat Products & Requiring Approval
- Shared Regulatory Services – Inspection Form – Purification and Dispatch Centres
- Shared Regulatory Services – Additional Form for Inspection of Premises Requiring Approval for Heat Treatment of Dairy Products
- Shared Regulatory Services – Supplementary Inspection Form – Establishments Handling/Manufacturing Egg Products

- Shared Regulatory Services – Inspection Form for the Specific Food Hygiene Requirements for Establishments Manufacturing Minced Meat, Meat Preparations & Mechanically Separated Meat and Requiring Approval
- Shared Regulatory Services – Inspection Form – Fishery Products Establishments (Fresh Fishery Products)
- Shared Regulatory Services – Inspection Form – Fishery Products Establishments (Frozen Fishery Products)
- Shared Regulatory Services – Inspection Form – Fishery Products Establishments (Mechanically Separated Fishery Products)
- Shared Regulatory Services – Inspection Form – Fishery Products Establishments (Processed Fishery Products)
- Shared Regulatory Services – Procedure for Premises Approved Under Product Specific Legislation (Food Safety)
- Shared Regulatory Services – Registration of a New Food Business Letter
- Shared Regulatory Services – FHRS Leaflet
- Shared Regulatory Services – Intervention Report Letter
- Shared Regulatory Services – FHRS Template for Sticker
- Shared Regulatory Services – Rejection of Appeal Letter
- Shared Regulatory Services – Rescore Request Letter
- Shared Regulatory Services – Template Letter for Incorrect Display of Rating
- Shared Regulatory Services – Template Letter for Non-Display of Rating
- Shared Regulatory Services – Fixed Penalty Notice Template
- Shared Regulatory Services – Procedure for Implementing the FHRS, Appeals and Requests for Rescores
- Shared Regulatory Services – Food Hygiene Inspection Form
- Shared Regulatory Services – Confirmation of Intervention
- Shared Regulatory Services – Incident Report Form (INC1)
- Shared Regulatory Services – Application for the Registration of a Food Business Establishment
- Shared Regulatory Services – Questionnaire for Verification Intervention
- Shared Regulatory Services – Verification Intervention Report
- Shared Regulatory Services – Food Intervention and Revisit Procedure
- Shared Regulatory Services – Food Standards Inspection Form
- Shared Regulatory Services – Instructions on adding Vale of Glamorgan Inspections to Flare (APP)
- Shared Regulatory Services – Alternative Food Safety Intervention Procedure for Low Risk Food Businesses
- Shared Regulatory Services – Information Gathering Form for D Rated Businesses
- Shared Regulatory Services – Information Gathering Visit – Advice Leaflet
- Shared Regulatory Services – Alternative Enforcement Questionnaire for Low Risk Registered Child-Minders
- Shared Regulatory Services – Alternative Enforcement Questionnaire for E Rated Food Businesses
- Shared Regulatory Services – Joint Port Health Procedure for Cardiff International Airport

- Shared Regulatory Services – Port Health Vessel Monitoring and Boarding Arrangements
- Shared Regulatory Services – Food Standards Inspection Sheet
- Shared Regulatory Services – Food Standards Inspection (Manufacturer) Sheet
- Shared Regulatory Services – Self-Assessment Inspection Questionnaire – Trading Standards
- Shared Regulatory Services – Food Standards Inspection Form
- Shared Regulatory Services – Food Standards Inspection and Re-Visit Procedure
- Shared Regulatory Services – Food Complaints Flow Chart
- Shared Regulatory Services – Food Complaints Leaflet
- Shared Regulatory Services – Food Complaint Receipt Form
- Shared Regulatory Services – 5x5x5 Information Intelligence Report (Form A)
- Shared Regulatory Services – Food Safety Complaints Policy and Procedure
- Shared Regulatory Services – Food Standards Complaint Procedure
- Shared Regulatory Services – Procedure for dealing with the Primary Authority Principle
- Shared Regulatory Services – Primary Authority Terms and Conditions
- Primary Authority – Summary of Partnership Arrangements between Anon Limited and The Vale of Glamorgan Council
- Shared Regulatory Services – Procedure for Business Advice and Fee Paying Visits
- Shared Regulatory Services – Management of Electronic Database Procedure
- Tascomi Public Protection Admin Role Profiles
- Shared Regulatory Services – Food Standards Sampling Plan 2016/18
- Shared Regulatory Services – Food Standards Sampling Procedure
- Shared Regulatory Services – Microbiology Food Sampling Plan until March 2017
- Shared Regulatory Services – Sampling Policy and Procedure
- Shared Regulatory Services – The Communicable Disease Outbreak Plan for Wales ('The Wales Outbreak Plan')
- Shared Regulatory Services – Procedure for the Notification and Investigation of Sporadic Cases of Communicable Disease
- Shared Regulatory Services – Procedure for the Investigation and Management of Outbreaks of Communicable Disease
- Wales Heads of Environmental Health Group – All Wales Communicable Disease Expert Panel – Good Practice Statement – Campylobacter Surveillance and Investigation
- Shared Regulatory Services – Pathogen Questionnaires
- Shared Regulatory Services – Food Incident Flow Diagram
- Shared Regulatory Services – Food Incident Report Form
- Shared Regulatory Services – Food Incident Procedure
- Shared Regulatory Services – Compliance and Enforcement Policy – February 2016
- Shared Regulatory Services – Compliance and Enforcement Policy – Annex 1: Food Safety Enforcement
- Shared Regulatory Services – Corporate Complaints and Compliments Procedure
- Vale of Glamorgan – Corporate Complaints Procedure

- Communicable Disease Expert Panel – Action Tracking Supplement
- Shared Regulatory Services – Internal monitoring Food Safety and Port Health Procedure
- Shared Regulatory Services – Internal Monitoring Food Standards Procedure
- Shared Regulatory Services – Approved Premises List
- Shared Regulatory Services – Food Hygiene Samples

(2) File and records reviews

A number of local authority records were reviewed during the audit, including:

- Shared Regulatory Services Joint Committee Minutes – 28 June 2016
- Shared Regulatory Services Joint Committee Minutes – 20 December 2016
- The Vale of Glamorgan Council – Appointment of Public and Agricultural Analysts
- Food and Port Health – Bridgend and Vale Training Programme 2016/17
- Food & Port Health – Cardiff Training Programme 2016/17
- Industry Training Programme 2016/17
- Trading Standards Training Programme 2016/17
- Communicable Disease Training Programme 2016/17
- Shared Regulatory Services – Tascomi Data Processing Agreement – Signed
- Officer authorisations and training records
- Calibration records
- General food establishment records
- Approved establishment files
- Food and food establishment complaint records
- Advisory and promotional materials provided to businesses and consumers
- Food sampling records
- Records of food related infectious disease notifications
- Food Incident records
- Informal and formal enforcement records
- Minutes of internal meetings and external liaison meetings
- Internal monitoring records
- Bridgend & Vale – Internal Audit Report

(3) Review of database records:

A selection of database records were considered during the audit in order to:

- Review and assess the completeness of database records of food inspections, food and food establishment complaint investigations, samples taken by the authority, formal enforcement and other activities and to verify consistency with file records.
- Assess the completeness and accuracy of the food establishment's database.
- Assess the capability of the system to generate food law enforcement activity reports and the monitoring information required by the Food Standards Agency.

(4) Officer interviews

Officer interviews were carried out with the purpose of gaining further insight into the practical implementation and operation of the authority's food control arrangements. The following officers were interviewed:

- Operational Managers
- Team Managers
- Commercial Services Officers
- Enterprise & Specialist Services Officers

Opinions and views raised during officer interviews remain confidential and are not referred to directly within the report.

(5) On-site verification checks:

Verification visits were made with officers to four local food establishments. The purpose of these visits was to consider the effectiveness of the authority's assessment of food business compliance with relevant requirements.

ANNEX C

Glossary

Approved establishments	Food manufacturing establishment that has been approved by the local authority, within the context of specific legislation, and issued a unique identification code relevant in national and/or international trade.
Authorised officer	A suitably qualified officer who is authorised by the local authority to act on its behalf in, for example, the enforcement of legislation.
Codes of Practice	Government Codes of Practice issued under Section 40 of the Food Safety Act 1990 as guidance to local authorities on the enforcement of food legislation.
CPIA	The Criminal Procedures and Investigations Act 1996 – governs procedures for undertaking criminal investigations and proceedings.
Critical Control Point (CCP)	A stage in the operations of a food business at which control is essential to prevent or eliminate a food hazard or to reduce it to acceptable levels.
Directors of Public Protection Wales (DPPW)	An organisation of officer heading up public protection services within Welsh local authorities.
Environmental Health Professional/Officer (EHP/EHO)	Officer employed by the local authority to enforce food safety legislation.
Food Examiner	A person holding the prescribed qualifications who undertakes microbiological analysis on behalf of the local authority.
Food Hazard Warnings/ Food Alerts	This is a system operated by the Food Standards Agency to alert the public and local authorities to national or regional problems concerning the safety of food.

Food/feed hygiene	The legal requirements covering the safety and wholesomeness of food/feed.
Food Hygiene Rating Scheme (FHRS)	A scheme of rating food businesses to provide consumers with information on their hygiene standards.
Food standards	The legal requirements covering the quality, composition, labelling, presentation and advertising of food, and materials in contact with food.
Food Standards Agency (FSA)	The UK regulator for food safety, food standards and animal feed.
Framework Agreement	<p>The Framework Agreement consists of:</p> <ul style="list-style-type: none"> • Food Law Enforcement Standard • Service Planning Guidance • Monitoring Scheme • Audit Scheme <p>The Standard and the Service Planning Guidance set out the Agency's expectations on the planning and delivery of food law enforcement.</p> <p>The Monitoring Scheme requires local authorities to submit quarterly returns to the Agency on their food enforcement activities i.e. numbers of inspections, samples and prosecutions.</p> <p>Under the Audit Scheme the Food Standards Agency will be conducting audits of the food law enforcement services of local authorities against the criteria set out in the Standard.</p>
Full Time Equivalents (FTE)	A figure which represents that part of an individual officer's time available to a particular role or set of duties. It reflects the fact that individuals may work part-time, or may have other responsibilities within the organisation not related to food enforcement.
HACCP	Hazard Analysis Critical Control Point – a food safety management system used within food businesses to identify points in the production process where it is critical for food safety that the Control measure is carried out correctly, thereby eliminating or reducing the hazard to a safe level.

Home authority	An authority where the relevant decision making base of an enterprise is located and which has taken on the responsibility of advising that business on food safety/food standards issues. Acts as the central contact point for other enforcing authorities' enquiries with regard to that company's food related policies and procedures.
Hygiene Improvement Notice (HIN)	A notice served by an Authorised Officer of the local authority under Regulation 6 of the Food Hygiene (Wales) Regulations 2006, requiring the proprietor of a food business to carry out suitable works to ensure that the business complies with hygiene regulations.
Inspection	The examination of a food or feed establishment in order to verify compliance with food and feed law.
Intervention	A methods or technique used by an authority for verifying or supporting business compliance with food or feed law.
Inter authority Auditing	A system whereby local authorities might audit each others' food law enforcement services against an agreed quality standard.
LAEMS	Local authority Enforcement Monitoring System is an electronic system used by local authorities to report their food law enforcement activities to the Food Standards Agency.
Member forum	A local authority forum at which Council Members discuss and make decisions on food law enforcement services.
National Trading Standards Board (NTSB)	An association of chief trading standards officers.
OCD returns	Returns on local food law enforcement activities required to be made to the European Union under the Official Control of Foodstuffs Directive.
Official Controls (OC)	Any form of control for the verification of compliance with food and feed law.

Originating authority	An authority in whose area a business produces or packages goods or services and for which the authority acts as a central contact point for other enforcing authorities' enquiries in relation to the those products.
PACE	The Police and Criminal Evidence Act 1984 – governs procedures for gathering evidence in criminal investigations.
Primary authority	A local authority which has developed a partnership with a business which trades across local authority boundaries and provides advice to that business.
Public Analyst	An officer, holding the prescribed qualifications, who is formally appointed by the local authority to carry out chemical analysis of food samples.
Registration	A legal process requiring all food business operators to notify the appropriate food authority when setting-up a food business.
Remedial Action Notices (RAN)	A notice served by an Authorised Officer of the local authority under Regulation 9 of the Food Hygiene (Wales) Regulations 2006 (as amended) on a food business operator to impose restrictions on an establishment, equipment or process until specified works have been carried out to comply with food hygiene requirements.
Risk rating	A system that rates food establishments according to risk and determines how frequently those establishments should be inspected. For example, high risk hygiene establishments should be inspected at least every 6 months.
Service Plan	A document produced by a local authority setting out their plans on providing and delivering a food service to the local community.
Trading Standards	The service within a local authority which carries out, amongst other responsibilities, the enforcement of food standards and feedingstuffs legislation.

Trading Standards Officer (TSO)	Officer employed by the local authority who, amongst other responsibilities, may enforce food standards and feedingstuffs legislation.
Unitary authority	A local authority in which all the functions are combined, examples being Welsh Authorities and London Boroughs. A Unitary authority's responsibilities will include food hygiene, food standards and feedingstuffs enforcement.
Unrated business	A food business identified by an authority that has not been subject to a regulatory risk rating assessment.
Wales Heads of Environmental Health (WHoEH)	A group of professional representatives that support and promote environmental and public health in Wales.