

FOOD & FEED SERVICE PLAN

2017 / 2018



**PUBLIC HEALTH & WELL-BEING
Public Protection Service
Business Engagement & Compliance Team**

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1. Service Aims and Objectives

1.1 Aims and Objectives

Rochdale Council's Public Protection Service aims to:

- ensure as far as possible the safety of food produced, sold and consumed within the Borough;
- ensure as far as possible the safety of feed produced, sold and used within the Borough;
- ensure as far as possible the safety of primary food production within the Borough;
- ensure as far as possible that food and feed meets appropriate quality standards, is correctly labelled and described and is free from contaminants;
- identify risks to the safety of food and feed produced or sold within the Borough and to advise and educate food businesses and take enforcement action where appropriate;
- support and promote the Food Standards Agency's Food Hygiene Rating Scheme;
- support funded regional working via the Food Standards Agency, the National Trading Standards Board and the Trading Standards North West Food and Feed Groups; and
- develop the professional qualifications, competencies and experience of Food and Feed Safety officers.

1.2 Links to Corporate Objectives and Plans

Activities in this Plan directly link to the four key priorities identified in the current Corporate Delivery Plan, ie they are intended to ensure service delivery with co-operative values and ethics at the heart of what we do in relation to People; Place; Prosperity; and Public Service Reform.

2. Background

2.1 Profile of the Local Authority

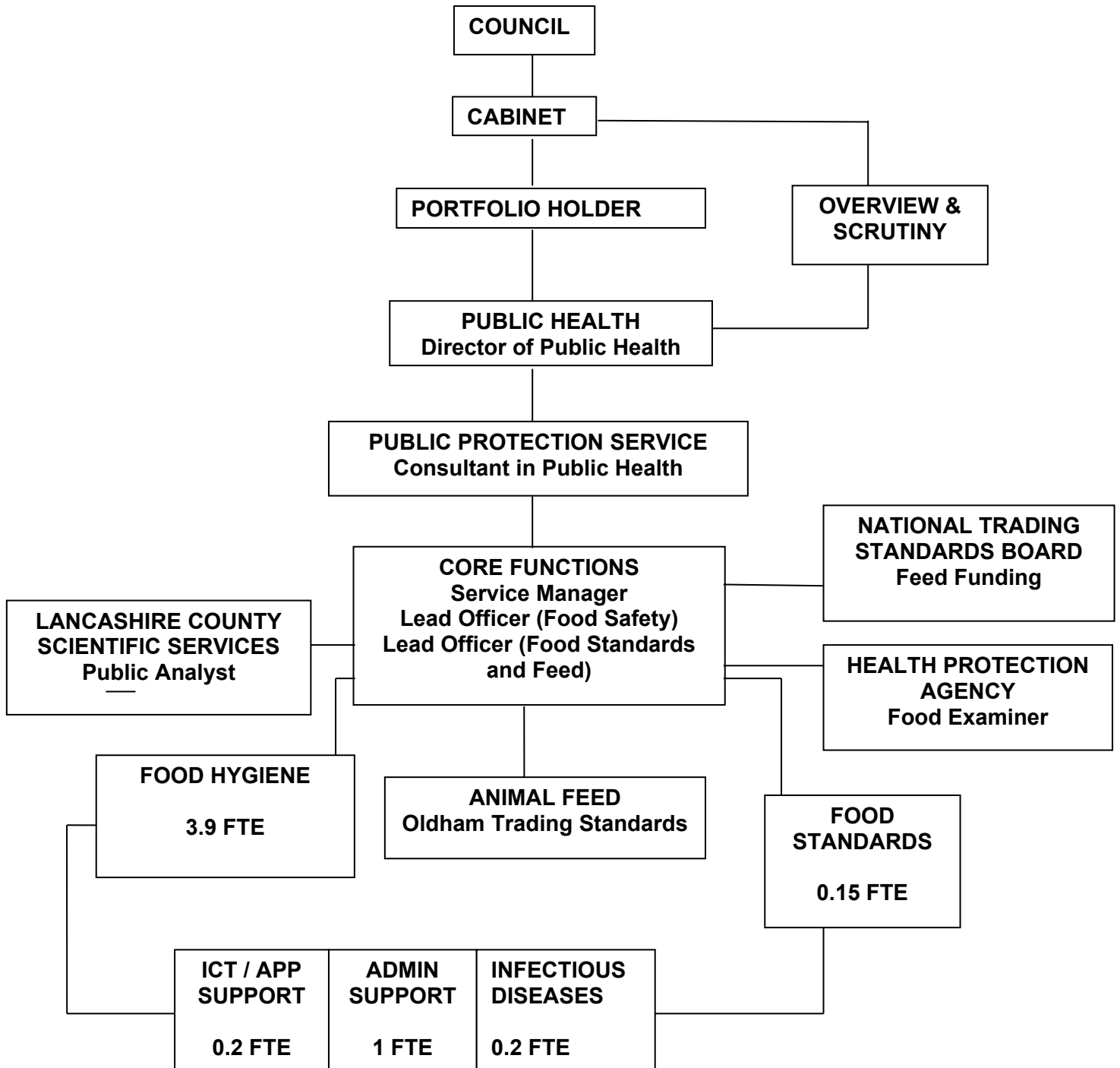
Rochdale Borough is located in the north-east region of the Greater Manchester conurbation. The Borough covers 62 square miles of which about two-thirds is rural. It is characterised by urban developments of dense housing and industrial areas located along major roadways.

The Borough is divided into four Townships based around the towns of Rochdale, Heywood and Middleton, together with the eastern urban area, the Pennines Township.

Full information about the profile of the Borough can be found on the Council's website at <http://www.rochdale.gov.uk/pdf/2011-Borough-Profile.pdf>

2.2 Public Protection Service

The Public Protection Service is located within the Public Health and Wellbeing Directorate and portfolio.



2.3 Scope of the Food & Feed Service

The Food Service is provided by Rochdale Council's Public Protection Service. The following is a list of the main food related responsibilities:

- provide a high quality food service in accordance with the FSA Framework Agreement (April 2010);
- undertake programmed food safety and food standards inspections of food premises, with reference to the FSA Code of Practice (March 2017). Available resources are targeted at the higher-risk premises;
- carry out investigation of complaints regarding food premises and items of food produced or sold within the Borough (applying risk-based criteria);
- liaise with other local authorities in relation to businesses for which the authority acts as Primary Authority and providing advice to these businesses where appropriate;
- dealing with basic requests for information and advice from food businesses and signposting where appropriate;
- introduce consistent GM wide recharges for requested Food Hygiene Rating Score rescore revisits and requested bespoke advisory visits
- participate in the AGMA Food Liaison Group, TSNW Food & Agriculture Group and other regional / national agencies; and
- control and investigate outbreaks of food-related infectious disease (provided in conjunction with other Public Protection staff).

Feed Service delivery is co-ordinated by Rochdale Council's Lead Officer (Feed) but the inspection of premises handling animal feed and sampling is carried out by Oldham Trading Standards.

2.4 Demands on the Food Service

2.4.1 Business Profile – Business Types

The breakdown of premises by business type liable for enforcement at 1st April 2017 is as follows:

| Food Safety (Hygiene and Standards) | | Feed Safety | |
|--|-------------|----------------------------------|-----------|
| Primary Producer | 7 | Co Product Producer (R12) | 9 |
| Manufacturer / Packer | 31 | Stores (R9) | 4 |
| Importer / Exporter | 1 | Distributor (R5) | 3 |
| Distributor / Transporter | 21 | Transporter (R8) | 3 |
| Retailers | 428 | On Farm Mixer (R10/11) | 4 |
| Restaurants & Caterers | 1122 | Pet Food Manufacturer (R6) | 1 |
| | | Supplier of Surplus Food (R7) | 19 |
| | | Livestock Farms (R13) | 53 |
| | | Arable Farms (R14) | 1 |
| TOTAL | 1610 | TOTAL | 97 |

2.4.2 Business Profile – Risk Categories

The breakdown of premises by risk category liable for enforcement at 1st April 2016 is as follows:

| Food Hygiene | | Food Standards | | Feed Safety | |
|----------------------|-------------|-------------------|-------------|--------------|-----------|
| Cat A (Highest Risk) | 11 | High Risk (A) | 3 | High Risk | 1 |
| Cat B | 72 | Medium Risk (B) | 363 | Medium Risk | 2 |
| Cat C | 318 | Low Risk (C) | 1195 | Low Risk | 39 |
| Cat D | 598 | Unrated / Uncoded | 49 | Unrated | 55 |
| Cat E (Lowest risk) | 512 | | | | |
| Unrated | 36 | | | | |
| TOTAL | 1610 | TOTAL | 1610 | TOTAL | 97 |

2.4.3 Approved Premises

The Authority is responsible for approving premises carrying out specialist processes, which fall within the scope of EC Regulation 853/2004. The numbers of these premises are as follows:

| Approved Premises | |
|---------------------------------|-----------|
| Dairy Products | 6 |
| Meat Products | 4 |
| Minced Meat & Meat Preparations | 2 |
| Cold Stores | 3 |
| TOTAL | 15 |

2.4.4 Service Delivery Points

The Public Protection Service is based at Number One Riverside, Floor 3, Smith Street, Rochdale, OL16 1XU and operates between 8.45am and 4.45pm, Monday to Friday

The service can also be contacted by telephone via the Council's Contact Centre (0300 303 8871), the Citizens Advice Consumer Service (0345 404 0506), through the website 'www.rochdale.gov.uk' and by email (environmental.health@rochdale.gov.uk)

2.4.5 Demographic Factors

Approximately 21% of Rochdale's population are from an ethnic minority background. Those of Pakistani origin form the largest proportion at 10.5%, with other ethnicities such as Bangladeshi and Chinese making up another 4%. The most deprived 3% of areas in the Borough have a bigger proportion of people from minority ethnic backgrounds (up to 30%). Traditionally a significant proportion of food business operators are from ethnic minority groups and a proportion of non-compliant food businesses are run by ethnic minorities.

2.5 Enforcement Policy

The Council has a Public Protection Enforcement Policy 2015 which covers the requirements for both Food and Feed Safety enforcement. The policy was developed in accordance with

the Regulators' Compliance Code (2014) and the Framework Agreement on Official Feed and Food Controls by Local Authorities (2010). It was formally adopted by Rochdale Council's Cabinet on 29 June 2015 and is displayed on the Council's website.

2.6 Document Management

Records of all Food and Feed Safety enforcement work are stored in digital format and are retained for 6 years.

3. Service Delivery

3.1 Food and Feed Safety Premises Visits

3.1.1 Food Hygiene Inspections

Food Hygiene inspections should be carried out on the basis of risk-based prioritisation, in line with the FSA Code of Practice. The Code sets out the frequencies at which routine food hygiene visits to food businesses should be made as follows:

| Category | | Minimum frequency |
|----------|--------------|--|
| A | Highest risk | At least every six months |
| B | | At least every 12 months |
| C | | At least every 18 months |
| D | | At least every 24 months |
| E | Lowest risk | Alternative enforcement strategies every 36 months |

Inspection programme

In previous years, the Section has struggled to undertake a full inspection programme in compliance with FSA Code of Practice due to resource constraints. However, the provision of recurrent funding from Public Health has enabled the Section to manage the previous backlog of "due inspections" and allow all current due inspections to also be completed. The challenge for the Service is to now maintain compliance with the FSA Code of Practice inspection frequency. The level of resources needed is obviously dependant on the scale of the inspection programme moving forward. The table below provides the details of numbers of inspections due based on current risk ratings of the current food businesses within the Borough;

| Food Hygiene | | |
|----------------------|------------------------|----------------------------|
| | Premises Total No's | Inspections due 2017/18 |
| Cat A (Highest risk) | 11 | 11 |
| Cat B | 72 | 72 |
| Cat C | 318 | 253 |
| Cat D | 598 | 352 |
| Cat E (Lowest risk) | 512 | 15 |
| Unrated | 36 | 36 |
| TOTAL | 1610 | 739 |

With current resources the inspection programme for the current year can be completely fulfilled if funding levels are maintained.

Where appropriate and necessary, inspections will also be carried out at premises subject to complaints. It is anticipated the in-house resource will be sufficient to manage this workload.

Proactive Enforcement

The current level of officer resource also allows the following proactive enforcement work to be carried during 2017/18 in order to raise compliance in food businesses;

- ATP swabbing to be used to determine the effective of cleaning in food premises
- Training project and support for new businesses including on-line training in different languages, food allergen leaflets in translated languages – Urdu, Chinese, Punjabi, Polish, & Hindu, on site allergen testing kits in peanuts & gluten
- AGMA Healthy Catering Award Scheme in schools (commitment to involve all schools within the Borough by 2020)
- Retail violence initiative targeted at takeaway premises
- Use of social media to raise awareness of Food Hygiene Rating Scores and general food safety awareness linked around National Food Safety week and seasonal events ie Valentines, Christmas, Easter etc

3.1.2 Food Hygiene Rating Scheme

The Service participates in the FSA's Food Hygiene Rating Scheme. This involves retail and catering businesses being given a food hygiene rating after each full hygiene inspection. They are provided with a window sticker which they are asked to display at their premises. The results are also available through the Council's website and as part of the Food Standards Agency national scheme.

The ratings allow consumers to make informed decisions about where they may wish to eat or purchase food and will help to improve hygiene standards by publicising information about individual businesses. The ratings are as follows:

| | |
|-------------|---------------------------|
| 0 (Lowest) | Urgent Improvement Needed |
| 1 | Major Improvement Needed |
| 2 | Improvement Needed |
| 3 | Generally Satisfactory |
| 4 | Good |
| 5 (Highest) | Very Good |

Where premises receive rating scores of 0-2 (non-compliant), follow up work and appropriate enforcement actions and revisits are carried out to raise standards and move the premises back into compliance.

3.1.3 Food Standards Inspections

Food Standards inspections should be carried out on the basis of risk-based prioritisation. Historically the Service has used the National Trading Standards Board (NTSB) risk rating criteria to risk rate the premises within the Borough. This resulted in a relatively small number of premises being rated as high risk and a large number of medium and lower risk premises. Risk based prioritisation resulted in the majority of the lower risk premises not being subject to an inspection.

The risk rating criteria used by the NTSB are slightly different than the FSA risk rating criteria. For consistency the Service switched to the FSA risk rating criteria for food standards during 2016-17, thus ensuring that both Food Hygiene and Food Standards follow the FSA risk rating criteria. This has resulted in a large number of premises being deemed to be “yet to be assessed” under the FSA criteria.

The FSA Code of Practice sets out the frequencies at which routine food standards inspections of food businesses should be made as follows:

| Category | | Minimum frequency |
|----------|--------------|--|
| A | Highest risk | At least every 12 months |
| B | | At least every 24 months |
| C | Lowest risk | Alternative enforcement strategies every 60 months |

Inspection programme

The table below provides the details of numbers of inspections due based on the current FSA risk ratings;

| | Premises Total No's | Inspections due 2016/17 |
|------------------------------|------------------------|----------------------------|
| A (Highest risk) | 3 | 3 |
| B | 363 | 77 |
| C (Lowest risk) | 1195 | 374 |
| Unrated / yet to be assessed | 49 | 1079 |
| TOTAL | 1610 | 1533 |

The inspections will continue to be risk based and the “due inspections” at the higher risk premises (A’s and B’s) will be fully completed. Alternative enforcement strategies will be carried out at the lower risk premises (C’s) due for intervention this year.

It is acknowledged that the resource for the current year will not facilitate inspections at the high number of unrated / yet to be assessed premises. It is therefore intended to continue to operate on a risk based approach; highest risk first, informed by the historical NTSB risk rating.

3.1.4 Feed Inspections

In 2013, the Food Standards Agency committed funding to the delivery of animal feed enforcement work via the National Trading Standards Board. This funding has been reduced year on year and subsequently in 2017/18 funding is provided for 12 Feed Inspections to be carried out in Rochdale.

The table below details the types of premises and the numbers of inspections to be completed during 2017-18;

| | Inspections |
|-----------------------------------|--------------------|
| Manufacturer (A1-A8/R1-R4/R6/A11) | |
| Co Product Producer - R12 | 3 |
| Mobile Mixer - R4 | |
| Importers | |
| Stores - R9 | 1 |
| Distributor (A1-A8/R1-R3/R5/A11) | |
| Transporter - R8 | 1 |
| On Farm Mixer - R10 and R11 | 2 |
| Pet Food Manufacturer – R06 | |
| Supplier of Surplus Food - R7 | 2 |
| Livestock farms - R13 | 3 |
| Arable Farms – R14 | |
| Total: | 12 |

As none of the qualified officers in this Service have the required competencies and Continual Professional Development, this work in 2017/18 will continue to be carried out on our behalf by Oldham Trading Standards.

3.2 Food & Feed Safety Complaints / Requests for Service

3.2.1 Food Hygiene

Complaints and requests for service in respect of food and the hygiene of food premises are dealt with in line with documented procedures. All complaints received are assessed by the Team Leader (Food), with the level of investigation / action being determined based on the risk to public health arising from the complaint.

We will continue to prioritise the most serious complaints and selection criteria have been developed to determine which complaints will take priority.

Approximately 600 complaints and service requests are expected to be dealt with in 2017/18.

All requests for 'Health Certificates' are dealt with to enable local businesses to export food. A charge is made for this work. Approximately 100 such requests are expected to be dealt with in 2017/18.

3.2.2 Food Standards and Feed

All food standards complaints are recorded and assessed for further action in line with documented procedures. The possible actions which are available, are included in the Enforcement Policy and are determined by the Team Leader (Commercial Practices) in consultation with the Lead Officer.

The Service expects to receive approximately 40 complaints and requests for trader advice per annum relating to food standards and feeding stuffs. From 1 April 2012 the service previously provided by Consumer Direct was transferred to the Citizens Advice Consumer Service. This situation remains.

3.3 Primary Authority

The aim of the Primary Authority Principle is to increase communication between local authorities dealing with businesses, which have multiple premises located in different parts of the country. It is a legal requirement that regulatory services comply with the Primary Authority Principle. The benefits of the Principle are as follows:

- greater enforcement consistency;
- increased efficiency and reduced enforcement duplication;
- preventative enforcement through advice on compliance;
- resolution of conflicts between different authorities and between authorities and businesses;
- better understanding and awareness of commercial issues;
- increased understanding of local businesses; and
- enhanced technical and audit expertise.

Proposed changes to partnership governance rules expected to take place in October 2017 has resulted in the 10 GM local authorities working collaboratively to create a Greater Manchester Centre of Excellence to support primary authority partnerships.

Rochdale does not currently have any Primary Authority Partnership Agreements in place relating to food but promotional work around the combined centre of Excellence may result in partnerships within the Borough being developed during 2017/18.

3.4 Advice to Business

The service will continue to provide assistance to business, to help them to comply with the requirements of legislation and improve compliance. This will primarily take place during routine inspections, complaint investigations and by signposting to extensive online guidance.

All written documentation clearly differentiates between legal requirements and recommendations for business improvements.

As a result of Public Health funding, the following proactive work will incorporate business advice during 2017/18:

- Training project and support for new businesses and non-compliant businesses including the provision of food hygiene manuals, training courses, on-line training in different languages, food allergen leaflets in translated languages – Urdu, Chinese, Punjabi, Polish, & Hindu, on site allergen testing kits in peanuts & gluten
- AGMA Healthy Catering Award Scheme in schools
- Support FSA National Food Safety Week and seasonal campaigns via social media
- Promote Food Hygiene rating scheme through social media

3.5 Food and Feed Safety Sampling

The Food Standards Agency Framework agreement requires local authorities to develop a sampling programme which should include the following:

- samples submitted following a complaint;

- samples taken as part of an investigation of a suspected food poisoning outbreak; and
- routine sampling, to assess the safety of particular foods.

3.5.1 Food Hygiene Sampling Programme:

Without FSA funding for food hygiene samples this year, priority will be given to samples from non-compliant businesses and those required during outbreak investigations. It is anticipated 70 samples will be taken in 2017/18.

3.5.2 Food Standards Sampling Programme

For several years the Food Standards Agency has committed funding to food standards sampling work via bids from regional food groups. Rochdale will continue to utilise this funding if it continues to be available during 2017/18.

3.5.3 Feed Sampling Programme

Since 2013, the Food Standards Agency has committed funding to feed sampling work via the National Trading Standards Board. Rochdale will continue to utilise this funding if it continues to be available during 2017/18.

3.5.4 Arrangements for analysis and examination of samples

The authority's Public Analyst is Lancashire County Scientific Services.

The Food Examiner who carries out microbiological analysis of food samples is the Health Protection Agency (York Laboratory).

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

The Council liaises with the Health Protection team in Public Health England on all matters relating to the control and investigation of food related infectious disease. When required an Outbreak Control Team is convened in accordance with criteria laid down in the Infectious Disease Outbreak and Control Plan, and includes representatives from the Council.

The investigation of suspected outbreaks is carried out in conjunction with the Public Protection Service Communities Team.

3.7 Food and Feed Safety Alerts

Food Alerts are issued by the Food Standards Agency to advise local authorities and consumers of foods which may not comply with food safety standards. These are dealt with in line with documented procedures, which comply with the guidance provided in the FSA Code of Practice ensuring that all food alerts 'For Action' are dealt with.

3.8 Liaison with Other Organisations

The Public Protection Service is committed to being involved in liaison with other local authorities, and associated organisations, to achieve consistency and to maintain our level of knowledge and understanding in a rapidly changing area of work. This is done by being actively involved in a number of Groups, including:

- AGMA Food Liaison Group;
- AGMA Public Protection Partnership;
- Public Health England;
- Trading Standards North West Food & Agriculture Group;

- Trading Standards North West Feed Group; and
- The Rochdale Borough Partnership Enforcement Team;
- Participation in FSA Communication for Compliance pilot

We also have consultation arrangements with other service providers within the Council in respect of:

- applications for planning approval;
- Building Regulations approval; and
- applications under the Licensing Act 2003.

3.9 Food and Feed Safety Promotion

In addition to the advisory activities carried out to support food businesses set out above, work is continuing to increase awareness of the importance of food safety and healthy eating amongst consumers. This includes the promotion of the Food Hygiene Rating Scheme, AGMA Healthy Catering Award and FSA seasonal campaigns.

The Service will also be supporting businesses by the use of technology;

The Service has 2 ATP swabbing machines; these immediately detect and quantify cleanliness of surfaces.

The Service will also be using allergen testing kits; again providing an immediate indication as to whether food allergens are present. General and bespoke information on food allergens will continue to be provided to businesses and consumers at every opportunity. Events organised by Link4Life are also supported.

4. Resources

4.1 Financial Allocation

The Food Hygiene and Food Standards teams have previously been part of separate teams within the Public Protection Service, but from June 2015 are both part of the same section (covering Core functions). However, Food Safety work is not carried out in isolation. As such, figures for financial resources are based on the staffing levels identified in section 4.2 below.

| | Food Hygiene | Food Standards |
|-----------------------------------|----------------|----------------|
| <u>Expenditure</u> | | |
| Employee Costs | 181,554 | 15,563 |
| Other running costs | 11,000 | 1,000 |
| Externally Contracted Inspections | 40,000 | 5,000 |
| TOTAL | 232,554 | 21,563 |
| | | |
| <u>Income</u> | | |
| Public Health Funding | 90,000 | 10,000 |
| TOTAL | 90,000 | 10,000 |
| | | |
| NET | 142,554 | 11,536 |

4.2 Staffing

The Food Hygiene, Food Standards and Feed functions are co-ordinated by the Lead Officer (Food) and Lead Officer (Feed) in the Public Protection Service. The Service also carries out a wide range of associated functions including Health and Safety, Commercial Practices, Private Water Supplies, Air Quality and Environmental Permitting.

The officers involved in providing Food Hygiene and Food Standards work are professionally qualified, have the appropriate experience and competencies, have knowledge of the Borough's food business environment and receive at least 20 hours Continuing Professional Development per annum, as required by the FSA's Code of Practice. They consist of:

| | |
|---|--|
| Service Manager: (Core) (NR) | Lead Officer (Food), Lead Officer (Feed) and responsible for a wide range of other regulatory functions. 10% of time spent on Food and Feed |
| Team Leader: Food Hygiene (JH) | 80% of time spent on Food Hygiene work |
| Team Leader: Health & Safety / ICT (GPF) | 20% of time spent on Food Safety work |
| Team Leader: Commercial Practices (GS) | 15% of time spent on Food Standards work |
| Senior Public Protection Officers (DM, GW, GS) (KA) (PM) | 80% of time spent on Food Hygiene work 50% of time spent on Food Hygiene work 35% of time spent on Food Hygiene work |
| Team Leader (LB) Senior Officer (SA) | 10% of each officer's time spent on Infectious disease investigations by Communities Team |
| Admin Officer (MP) | 100% of time on Food Safety work |

Feed Safety work is provided by appropriately qualified officers from Oldham's Trading Standards Service.

4.3 Staff Development Plan

The training and development of staff is essential to ensure that officers are able to carry out their duties effectively. Each year, officers are asked to identify their needs as far as training is concerned during Performance and Development Reviews. Managers then assess these against the needs of the service in order to ensure that the appropriate 20 hours of Continuing Professional Development training are attained.

Training for staff is provided in a number of ways:

- induction training for new members of staff;
- courses provided by the Council's Communications Team & Virtual College;
- training provided by the FSA through the AGMA Food Liaison Group and TSNW Food and Feed Groups;
- courses and seminars provided by external organisations;
- in-house training including team meetings and instruction provided on-the-job and on a one-to-one basis; and
- regional team meetings ie AGMA Food Group
- subscription to ABC Training online provider

Officers attending external courses and seminars as appropriate are expected to cascade the learning and give a presentation to the rest of the team. This can range from a simple overview of the event to a more formal presentation providing considerable detail; including copies of hand-outs, etc.

5. Quality Assessment

The documented procedures have been reviewed to verify conformance with the FSA Framework Agreement, relevant legislation, codes of practice, documented policies and procedures. These include:

- monitoring of officers work by the Team Leaders and Service Manager;
- inspection targets;
- team meetings;
- accompanied inspections;
- one-to-one meetings with officers;
- identification of training needs;
- review of documents; and
- review of complaints against the service.

6. Performance

6.1 Review against the Service Plan

The Service Manager and Team Leaders monitor and review performance against the Service Action Plan at monthly 1-2-1 meetings; team meetings (every 6 weeks); and on an annual basis.

A full annual review is carried out during April each year to enable the annual local authority performance return to be completed and submitted to the Food Standards Agency. Performance data is included in the subsequent years annual Service Plan and is reported to elected members via Cabinet.

Increased resources over the last year have resulted in increased performance, increased activity output and increased outcomes for the Borough. The performance for the year 2016/17 was as follows:

6.1.1 Food Hygiene

| Risk Rating | Inspections | | |
|------------------|-------------|--------------------|-------------|
| | Due | Done | Outstanding |
| A (Highest Risk) | 53 | 53 | 0 |
| B | 164 | 164 | 0 |
| C | 564 | 564 | 0 |
| D | 505 | 505 | 0 |
| E (Lowest Risk) | 141 | 141 | 0 |
| Unrated | 308 | 308 | 0 |
| TOTAL | 1735 | 1735 (100%) | 0 |

| Risk Rating | Broadly Compliant Premises |
|------------------|--|
| A (Highest Risk) | 1 |
| B | 42 |
| C | 342 |
| D | 589 |
| E (Lowest Risk) | 512 |
| TOTAL | 1468 (91%) <i>(88% in 2015/16)</i> |

| Enforcement Actions | Premises Numbers |
|---------------------|------------------|
| Voluntary Closure | 15 |
| Improvement Notice | 8 |
| Advisory Notice | 993 |
| TOTAL | 1022 |

| Samples | Satisfactory | Unsatisfactory |
|-----------------------------|--------------|-----------------------------------|
| 69 microbiological analysis | 65 (94%) | 4 (6%) <i>(10% in 2015/16)</i> |

| Complaints | Number |
|---------------------|---------------------------------------|
| Food | 407 |
| Hygiene of Premises | 156 |
| TOTAL | 563 <i>(343 in 2015/16)</i> |

6.1.2 Food Standards

| Risk Rating | Inspections | | |
|--------------|--------------------|------------------|---|
| | Due | Done | Outstanding |
| High (A) | 2 | 1 | 1 |
| Med (B) | 118 | 34 | 84 |
| Low (C) | 795 | 71 | 724 |
| Unrated | 2 | 2 | 0 |
| TOTAL | 917 | 108 (12%) | 809 (88%) <i>(96% in 2015/16)</i> |

| Risk Rating | Broadly Compliant Premises |
|--------------|--|
| High (A) | 1 |
| Med (B) | 354 |
| Low (C) | 1195 |
| TOTAL | 1550 (96%) <i>(95% in 2015/16)</i> |

| Enforcement Actions | Number |
|----------------------------|-------------------------------|
| Written warnings | 108 <i>(72 in 2015/16)</i> |
| Prosecutions | 1 <i>(0 in 2015/16)</i> |

| Samples | Satisfactory | Unsatisfactory |
|----------------|---------------------|------------------------------------|
| 17 analysed | 13 (76%) | 4 (24%) <i>(30% in 2015/16)</i> |

| Complaints | Number |
|-------------------|------------------------------|
| Food | 41 <i>(35 in 2015/16)</i> |

6.1.3 Feed

| Category | Inspections | Alternative Enforcement Strategies |
|----------------------------------|----------------------------|---|
| A1-A8/R1-R3/R5/A11 (Distributor) | 2 | 0 |
| R7 (Supplier of surplus food) | 5 | 1 |
| R8 (Transporter) | 2 | 0 |
| R10 (On Farm Mixer) | 2 | 0 |
| R12 (Co Products) | 4 | 0 |
| R13 (Livestock) | 9 | 0 |
| TOTAL: | 24 (100%) | 1 (100%) |

6.2 **Identification of any variation from the Service Plan**

6.2.1 Food Hygiene

None - all due inspections were completed meaning the inspection programme was 100% completed.

6.2.2 Food Standards

The additional Public Health funding allowed for an increased number of food standards inspections to be carried during the year, however a large proportion of the premises due for inspection remain outstanding. The proposed use of alternative enforcement strategies for the lower risk premises and a risk based approach to the unrated / yet to be assessed premises aims to reduce this number during 2017/18.

6.2.3 Feed

None - all 24 of the funded feed visits were carried out, and 1 alternative enforcement strategy was undertaken. All work was carried out on this Council's behalf by suitably-qualified colleagues from Oldham Council.

6.3 Areas for Improvement

It is acknowledged that the Public Protection Service was not compliant with the requirements of the FSA's Code of Practice on inspection frequency in previous years. The audit conducted by the FSA in March 2015 concentrated on food hygiene and raised the profile and priority of this work within the Council. Additional resource and a significant amount of effort by officers and management has been put into place to address this. The Service is very proud that these efforts have eradicated the backlog of "due inspections" and allowed the full inspection programme to be completed for food hygiene.

The shift to the FSA risk rating criteria has resulted in a large number of unrated / yet to be assessed premises. It is intended to address these premises in a risk based approach informed by the historical NTSB risk rating.

Feed work will continue to be undertaken at the capacity dictated by the available funding via Trading Standards North West.

6.4 Future Challenges

The following areas have been identified as challenges to effective, compliant Food Safety and Feed Safety service delivery for 2017/18;

6.4.1 Resources

A historical lack of resource within the Service resulted in identification of areas in need of improvement by the FSA in March 2015. It is acknowledged that these areas have successfully been addressed. The challenge moving forward is to ensure that the Service maintains the improvements made and does not revert back to under-performance. The key to maintain performance is to maintain an appropriate level of resource to enable compliance with the FSA Code of Practice on inspection frequency.

The current resources available to the Service in 2017/18 allow a variety of interventions to be delivered. In-house officers provide a high quality, consistent service including programmed inspections at the higher risk premises, reactive interventions in relation to complaints and intelligence received, enforcement action, proactive interventions raising awareness for consumers and providing business supporting and bespoke advice. The additional revenue resource funds additional officers and allows the purchase of high numbers of inspections at medium and lower risk premises.

The current contract for inspections and the procurement process has shown that procurement in an open market can drive down unit costs and the purchase of high numbers of inspections can provide high value for money. Rochdale has worked with STaR procurement to develop a framework to procure inspections for all 10 GM local authorities. It is anticipated that this framework will further drive down costs due to the greater buying power of the 10 local authorities.

6.4.2 Legislative

Exiting the EU will have an impact on Food Law in the UK. Many legislative changes will need to be implemented to ensure standards are embedded into UK legislation;

The FSA have recently published a paper “regulating our future” which sets out fundamental changes on how English local authorities regulate food businesses. It recognised that the global food market has changed dramatically over the years and that regulation needs to keep up. It proposes enhanced registration and segmentation of food businesses, introduces assurance schemes, whilst retaining some inspection role for LAs;

The Food Law Code of Practice (2017) implemented a requirement to ensure qualified officers have 20 hours continuing Professional Development per annum;

Revised Food Law Code of Practice (2015);

Food Information Regulations 2014 and the allergen labelling requirement (December 2014) for all food; prepacked and non-prepacked;

In Wales and Northern Ireland charges for Food Hygiene Rating rescore visits are in place. FSA England have advised that LA's can now put in place a mechanism for cost recovery from businesses. GM local authorities have proposed a standardised fee of £165 for a rescore under the Food Hygiene Rating Score scheme. In line with Primary Authority charges, propose a charge for bespoke advisory visits at £79 per hour.