



**Caerphilly County Borough
Council
Communities Directorate
Public Protection**

**FOOD ENFORCEMENT
SERVICE PLAN
2019/2020**

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Food Enforcement

FOOD ENFORCEMENT SERVICE PLAN - 2019/2020

CONTENTS

Pages

CHAPTER 1	Service Aims and Objectives	3
1.1	Introduction	3
1.2	Aims and Objectives	3
1.3	Links to 'Caerphilly Delivers'	4
CHAPTER 2	Background	5
2.1	Profile of the Local Authority	5
2.2	Organisational Structure	5
2.3	Scope of the Food Service	8
2.4	Demands on the Food Service	9
2.5	Enforcement Policy	10
2.6	Food Sampling Policy	10
CHAPTER 3	Service Delivery	11
3.1	Food Premises	11
3.2	Food Safety & Hygiene Interventions	12
3.3	Food Standards Interventions	13
3.4	Food Hygiene Primary Production (Food Standards)	14
3.5	Food Safety & Hygiene Requests for Service (Food Complaints)	14
3.6	Food Standards Complaints & Service Requests	15
3.7	Primary Authority/Home Authority Principle	15
3.8	Advice to Business	15
3.9	Food Safety & Hygiene Sampling	17
3.10	Food Standards Sampling	18
3.11	Control and Investigation of Outbreaks and Food Related Communicable Diseases	18
3.12	Food Safety Incidents	19
3.13	Liaison with other Organisations	19
3.14	Food Promotion	20

CHAPTER 4	Performance Management	22
4.1	Measuring Performance	22
4.2	Benchmarking	22
CHAPTER 5	Resources	23
5.1	Estimated Human Resources	23
5.2	Financial Estimates	24
5.3	Staffing Allocation	25
5.4	Training	25
CHAPTER 6	Quality Assessment	26
6.1	Quality Systems	26
CHAPTER 7	Review	27
7.1	Review Against the Service Plan	27
7.2	Identification of Variances from the 2017-2018 Plan	27
7.3	Areas for Improvement 2018-2019	27
APPENDIX I	Service Delivery Review 2018-2019	30
APPENDIX II	Food Hygiene Sampling Plan 2019/20	48
APPENDIX III	Food Standards Projects/Surveys/ Sampling Plan 2019/20	49

CAERPHILLY COUNTY BOROUGH COUNCIL FOOD ENFORCEMENT SERVICE PLAN

1. SERVICE AIMS & OBJECTIVES

1.1 Introduction

This local authority has a statutory duty to enforce the Food Safety Act 1990 and The Food Hygiene (Wales) Regulations 2006.

The Food Standards Agency has a key role in overseeing local authority enforcement activities in respect of food matters, and has issued guidance on the annual production of food enforcement service plans by local authorities.

The Agency has been proactive in setting and monitoring standards and will continue to undertake an auditing role in respect of food enforcement activities.

This is the Food Enforcement Service Plan produced by Caerphilly County Borough Council for the financial year 2019/2020.

The plan is approved under delegated powers by the Cabinet Member for Environment and Public Protection on recommendation from the Head of Service. It is compiled on an annual basis and a review against the programme is carried out quarterly and at the end of the year.

In producing this plan the authority has sought to develop a range of strategies, activities and interventions that ensure a balanced approach to service delivery. This 'enforcement mix' seeks to balance the need for proactive intervention programmes with the need to promote, educate and inform both business and the public.

1.2 Aims & Objectives

The Service's Statement of purpose is:

"To protect and improve the social, economic, environmental, and cultural wellbeing of our communities".

One of the Service's key objectives is:

"Proportionate and targeted enforcement, education and advice that prevents harm to public health and safety and protects consumer and business interests by promoting a fair trading environment".

The Service contributes to the 4 national enforcement priorities for Wales published by Welsh Government:

- 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 trading environment for citizens and business
- improving the local environment to positively influence quality of life and promote sustainability

The Well-being of Future Generations (Wales) Act 2015 is about improving the social, economic, environmental and cultural well-being of Wales. The Act sets out seven Well-being Goals showing the kind of Wales we want to see.

This service area specifically links into the following National Well-being Goals:

- A prosperous Wales
- A globally responsible Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities

Having regard to the five ways of working set out in the sustainable development principle, as defined in the Act our proactive inspection and surveillance programmes are focussed on preventing harm to public health and safety. We enforce legislation to protect consumer and business interests to promote a safe and fair trading environment, but also advise and educate both business and the public; collaborating with them to promote compliance and improve standards over the long term.

1.3 Links to Corporate Priorities

The 5-year 'The Caerphilly We Want 2018-2023' commenced from May 2018 and in support of this, the new local authority Well-being Objectives have been developed and encompassed within a new style corporate plan to run on the same time line; 2018-2023.

The service area links into the following Well-being Objectives:

- Well-being Objective 1 - Improve education opportunities for all
- Well-being Objective 5 – Creating a County Borough that supports a Healthy Lifestyle in accordance with the Sustainable Development Principle within the Wellbeing of Future Generations (Wales) Act 2015
- Well-being Objective 6 – Support citizens to remain independent and improve their well-being

The main food enforcement activities that link with these priorities are:

- Risk-assessed food intervention programmes
- Welsh Food Hygiene Rating Scheme
- Food sampling programmes
- Investigation of food complaints
- Consumer information and education
- Trader information and education
- Provision of training for food safety management and food standards
- Food sampling projects
- Special food projects, surveys etc.
- 'Primary Authority/Home Authority' principle
- Investigation of communicable disease
- Food fraud investigations

2. BACKGROUND

2.1 Profile of the Local Authority

Caerphilly County Borough Council is the fourth largest authority in Wales and stretches from the Heads of the Valley in the north to Risca and Caerphilly near the M4 corridor in the south, a distance of some 40 kilometres. The county borough has over 50 distinct towns and villages. The larger settlements include Caerphilly, Blackwood, Newbridge, Bargoed, Ystrad Mynach, and Risca. The Council provides services for 180,795 people who live in an area covering 278km².

Of the Council's 110 Lower Super Output Areas (LSOAs), 67% are in the top 50% most deprived LSOAs in Wales. 13 of the Council's LSOA's feature in the top 10% most deprived category. There is a concentration of more deprived LSOAs in the north of the county borough, along with smaller pockets elsewhere, particularly around Caerphilly town.

There are approximately 1,550 registered food premises within the borough in which food or drink is manufactured, processed, stored or sold.

2.2 Organisational Structure

2.2.1 Member Structure

The Council has adopted a Cabinet style of Local Government, based on a Leader and Cabinet model. The current Cabinet consists of:

Leader of Council

Deputy Leader of Council and Cabinet Member for Finance, Performance and Governance

Deputy Leader of Council and Cabinet Member for Economy, Infrastructure, Sustainability and Future Generations Champion

Cabinet Member for Corporate Services

Cabinet Member for Environment and Public Protection

Cabinet Member for Education and Achievement

Cabinet Member for Neighbourhood Services

Cabinet Member for Social Care and Wellbeing

Cabinet Member for Homes and Places

The Cabinet has responsibility for Food Safety and Food Standards enforcement.

The Regeneration and Environment Scrutiny Committee oversees the Food Safety enforcement and infectious diseases and the Trading Standards function.

2.2.2 Directorate Organisation

A corporate management team led by the Interim Chief Executive and three Directors undertake the day-to-day management of the council.

Council services are provided by the three Directorates of Social Services and Housing, Communities, Education and Corporate Services.

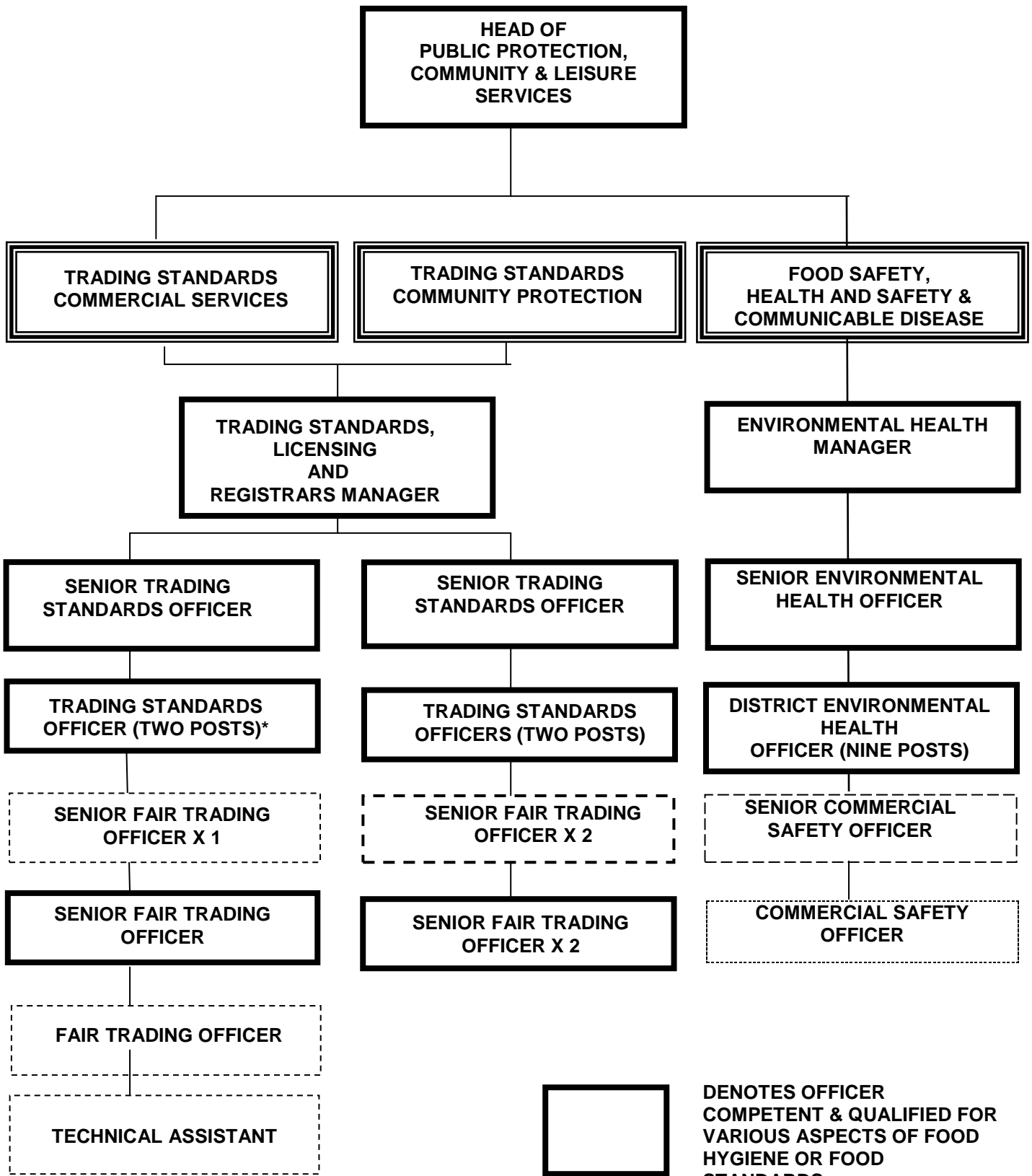
The Public Protection Division, which includes both Environmental Health and Trading Standards Services, reports within the Communities Directorate. The Head of Public Protection, Community and Leisure has delegated responsibility for all matters relating to Food Safety and Standards.

Individual post holders have been given direct delegation to take any action and exercise functions in relation to the Food Safety Act 1990, European Communities Act 1972, The Food Hygiene (Wales) Regulations 2006 (and other appropriate legislation). Certain officers have been authorised by the Food Standards Agency under the Food and Environment Protection Act 1985.

Food enforcement activities are carried out by Environmental Health Officers in the Food Safety Team and Trading Standards professionals within the Commercial Services and Community Protection Teams. The structures of the three enforcement teams are shown in *Figure 1* overleaf.

Figure 1

Structure of Food Law Enforcement



1 TSO post currently vacant*

□ DENOTES OFFICER COMPETENT & QUALIFIED FOR VARIOUS ASPECTS OF FOOD HYGIENE OR FOOD STANDARDS
- - - □ SNR COMMERCIAL SAFETY AND COMMERCIAL SAFETY OFFICER CARRY OUT THE FOOD SAMPLING FUNCTION

2.2.3 External Services

The following provide specialist services:

- **Food Analysts**

Two Public Analyst Services provide chemical and physical analysis, examination of food, sampling, labelling advice and expert opinions:

- Public Analyst Scientific Services, Valiant Way Wolverhampton WV9 5GB
- Minton Treharne & Davies Ltd (Head Office) Croescadam Close, Pentwyn, Cardiff CF23 8HF

- **Food Examiners**

Bacteriological examinations of food samples and food complaints are provided by:

- Public Health Wales – Cardiff Laboratory, Llandough Hospital, Penlan Road, Penarth, Vale of Glamorgan, CF64 2XX, Tel No.029 20715298

- **Specialist Contractors:**

- Employed as and when required

2.3 Scope of the Food Service

The Food Safety and Trading Standards Teams are responsible for undertaking the following work activities that are detailed and expanded in the current operational plans:

- A programme of food hygiene and food standards interventions
- Carrying out interventions/re-visits between programmed interventions where significant contraventions are found or following the receipt of intelligence or complaints
- Enforcement activities such as warnings, formal notices and closures, simple cautions, and prosecutions in line with the Public Protection Enforcement Policy
- Collection and submission of intelligence on food incidents and criminal activity involving food
- Implementing food sampling programmes (microbiological, compositional & labelling)
- Proactive projects and surveys
- Providing advice and assistance to local businesses to assist them to comply with food legislation
- Investigation of complaints and responding to service requests
- Investigating suspected and confirmed cases of communicable disease including food poisoning in liaison with the Consultant in Communicable Disease Control (CCDC)
- Responding to Food Standard Agency Food Incidents and Alerts as appropriate
- Examination of and responding to planning and licensing applications in relation to food premises where appropriate

- Providing and reviewing systems and procedures in line with FSA Framework Agreement
- To act as Primary/Home Authority and implement Service Level Agreements where appropriate
- Implementation of the Welsh Food Hygiene Rating Scheme

2.4 Demands on the Food Service

2.4.1 Food Premises

The Table in section 3.1 shows the number and type of premises in the county borough area.

2.4.2 Approved Premises

The Food Safety team is responsible for the approval and inspection/audit of product specific premises. These premises manufacture high-risk foods such as meat and dairy products, which are then sold to retailers or caterers. The Authority has 11 such establishments, which require a considerable amount of officer time. Of these 11, 4 are primarily approved for meat products, 1 for meat preparations, 1 for dairy products, 2 for egg packing and 3 as a cold store. Involvement includes home authority referrals, food complaint investigations, advisory visits, inspections/audits and revisits.

2.4.3 Major Manufacturers

In addition to the approved premises there are two other large food manufacturers in the County Borough who produce bread and dried snacks. There are also 16 smaller manufacturers producing a variety of food products.

2.4.4 Importers

There are two importers located in the County Borough.

2.4.5 Seasonal Variation

Two farms undertake seasonal slaughter of poultry, mostly for the Christmas trade. A number of large outdoor events take place annually within the borough e.g. the Food Festival and the Big Cheese. These events involve a considerable input from both teams.

2.4.6 Cultural and Ethnic Diversity

The number of food premises in the county borough whose first language is not English is relatively low, although the exact figure is unknown. Translated versions of several business advice leaflets and Safer Food Better Business are also available, and translation of further information is available on request. The Trading Standards team has also developed a digital Allergen resource and poster in nine languages.

2.4.7 Service Delivery

All aspects of the food service are based in Penallta House, Tredomen Park, Ystrad Mynach, CF82 7PG. The food service is available during office hours from 8:30a.m. to 5:00p.m. Monday to Thursday and 8.30a.m. to 4.30p.m. Friday. Outside office hours the authority operates a 24-hour emergency service. In addition officers conduct unannounced visits and investigations at hours other than those listed above.

The Caerphilly County Borough Council website provides information on the services provided. There is information for businesses, details of the Enforcement Policy, Food Service Plan, and Food Hygiene Rating Scheme.

The Website address is:

www.caerphilly.gov.uk

Complaints relating to food can be made via the internet or at:

foodhealthsafety@caerphilly.gov.uk

or

tradingstandards@caerphilly.gov.uk

2.5 Enforcement Policy

The Public Protection Service has adopted an overarching Enforcement Policy for its regulatory function. It has full regard to the Regulators Code. A copy of the Policy may be found at www.caerphilly.gov.uk

2.6 Food Sampling Policy

The Food Safety and Standards teams have a joint Food Sampling policy. The policy takes into account the various reasons for undertaking sampling programmes and the different types of sampling methods to be deployed.

The Head of Public Protection, Community and Leisure Services who has delegated powers for enforcement matters relating to Food Safety & Standards, has approved the policy.

3. Service Delivery

3.1 Food Premises

The Food Law Code of Practice (Wales) gives food authorities the option of using different types of interventions in specific circumstances. Interventions are defined in the Code as activities that are designed to monitor, support and increase food law compliance within a food establishment, they include, but are not restricted to, “official controls” as defined in Article 2(1) of Regulation EC 882/2004.

Official controls that may be used include inspections, partial inspections, audits, surveillance, verification, monitoring and sampling visits.

A risk based approach to food safety has been adopted. All food safety high risk premises receive a full inspection/audit in order to attain the targets set locally and in order to issue a food hygiene rating to the business. Low risk premises could be subject to an inspection or an alternative intervention depending whether or not they fall into the scope of the food hygiene rating scheme. New businesses will be risk assessed in order to prioritise the high risk ones for inspection. There is only one National PI for food safety for 2019/20 - the percentage of food establishments which are ‘broadly compliant’ with food law.

The Food Safety Team operates the Welsh Food Hygiene Rating Scheme which made it mandatory for businesses to display the hygiene rating awarded to the business from 28th November 2014. All businesses within the scope of the scheme are issued with a food hygiene rating following an unannounced inspection.

The team also offers assistance to businesses with poor food hygiene ratings. This is in the form of coaching/training visits to help them improve their practices and develop a food safety management system, which in turn should improve the food hygiene rating awarded.

Food Standards interventions are carried out by food qualified officers in the Trading Standards Service. The Food Standards Interventions at Food Establishments Policy approved by the Head Public Protection, Community and Leisure Services sets out how interventions are prioritised and describes how premises are selected for intervention.

Trading Standards is a high demand, responsive front line service. As such there may be times when service delivery deviance is necessary, for example where resources are diverted towards intelligence led enforcement, major incidents affecting the service, special projects and criminal investigations.

The demands on the food service vary from year to year as premises open and close. A breakdown of the categories of food premises located within the county borough, subject to food law regulation (as at 1st April 2019) is provided overleaf.

Categories of Food premises trading within Caerphilly County Borough

Premise Type	Food Hygiene	Food Standards
Primary Producers	8	9
Manufacturers/Packers	47	48
Importers/Exporters	2	2
Distributors/Transport	19	20
Supermarket/Hypermarket	34	34
Small Retailers	237	237
Retailer/Other	68	67
Restaurant/Café/Canteen	197	196
Hotel/Guest House	10	10
Pub/Club	230	230
Takeaway	185	185
Caring Premises	230	230
School/College	94	94
Mobile Food Unit	433	433
Restaurant/Caterers Other	129	131
Total	1923	1926

3.2 Food Safety & Hygiene Interventions

The interventions due for 2019/2020 are shown below:

Risk Scored Interventions

Category	Frequency	Total No of Premises	Interventions due
A	6 months	5	10
B	12 months	70	70
C	18 months	697	404
Total high risk		772	484
D	2 years	197	113
E	interventions every 3 years or Alternative Enforcement Strategy	567	157
Total low risk		764	270
Outside programme		394	-
Unrated		21	21
Estimated Revisits			290
Total other		415	311
Total		1951	1065

Inspections are grouped geographically for reasons of economy. There are currently 11 Approved food establishments within the county borough. Of these 11, 2 are approved for Egg Products, 1 for Dairy Products, 3 as cold stores, 1 for Meat Preparations and Meat Products and 4 for Meat and Fish Products.

Deviation from the programmes outlined above, may occur in response to major food incidents e.g. food poisoning outbreaks/incidents, food fraud investigations; special projects referred from the Food Standards Agency; new legislation etc.

In order to determine whether a revisit is necessary, consideration will be afforded to:

- a) The number and seriousness of the offences,
- b) The willingness of the proprietor to comply,
- c) Issues related to public health protection, and
- d) Premises awarded a FHR score of 2 or less

The Estimated Resources required to deliver this service is 4.2 F.T.E

3.3 Food Standards Interventions

Food Standards interventions establish whether legal requirements covering quality, composition, labelling, presentation, advertising and materials or articles in contact with food are being met. They also aim to detect any illicit food fraud activity.

A risk based approach to Food Standards has been adopted in respect of all businesses. The service seeks to promote a consistent and effective approach to regulatory intervention and enforcement. It focuses on prevention rather than cure and is proactive in taking firm action against those who flout the law, act irresponsibly, or where there is an immediate risk to health and safety.

Food Standards 'High' risk rated premises receive a full inspection as per the inspection programme. 'New businesses' are also a priority for intervention. It is also planned to inspect 'Medium' risk rated premises. 'Low' risk rated premises may receive an inspection or be subject to an Alternative Enforcement Strategy.

Enforcement revisits are carried out when businesses are found to be broadly non-compliant with significant statutory requirements. These depend on the nature of the breaches found, whether there is an imminent risk to health, the scale of any consumer detriment and the rectification required.

The Food Standards interventions due for 2019/20 are shown overleaf:

Food Standards Risk Scored Interventions 2019/20

Risk Profile	Frequency	Total No of Premises	Interventions due
A (High)	At least every 12 months	26	26
B (Medium)	At least every 24 months	556	350
C (Low)	Alternative Enforcement Strategy or intervention every 5 years	909	87
		1491	463
Outside programme		391	-
Unrated		62	62
Total other		453	62
Total		1944	525

The Estimated Resources required to deliver this service is 2.0 F.T.E

3.4 Food Hygiene - Primary Production (Food Standards)

EU Regulation (EC) No 852/2004 on the hygiene of foodstuffs is aimed at ensuring the controls throughout the food chain are strengthened. Food hygiene at primary production level is enforced as part of the Food Standards function. In practice Animal Health Officers who are appropriately qualified enforce this legislation during interventions at agricultural premises.

The Estimated Resources required to deliver this service is 0.1 FTE

3.5 Food Safety & Hygiene Requests for Service (Food Complaints)

Requests for service in relation to foodstuffs are investigated in accordance with the Food Complaints procedure and the Food Law Code of Practice (Wales). Caerphilly County Borough Council acts as home authority to several food manufacturers located within the area and therefore investigates complaints allegedly arising from those premises, very often on behalf of other local authorities. Food complaints are also investigated when they are linked to other premises within the county borough. Complaints relating to the hygiene of food businesses are also investigated.

Details of all requests for services are recorded on the APP database.

It is anticipated that in excess of 125 requests for service regarding foodstuffs and food hygiene will be received annually.

In addition 87 advisory visits were conducted to a variety of businesses to advise on layout & design and food safety practices and procedures.

The Estimated Resources required to deliver this service is 0.5 F.T.E

3.6 Food Standards Complaints & Service Requests

Complaints and Service Requests regarding Food Standards are recorded on the database.

Food Standards complaints are actioned in accordance with the service's policies and procedures outlined in the Quality manuals and the Food Law Code of Practice (Wales).

Response to complaints is reactive and dependent on those received. It is estimated the Food Standards service will deal with between 40 and 50 complaints based on recent year's trends.

The Food Standards service also responds to requests from Food Business Operators for advice and guidance to assist them comply with the plethora of food standards legislation. The requests are wide ranging and vary in content and complexity.

The Estimated Resources required to deliver this service is 0.2 F.T.E

3.7 Primary/Home Authority Principle

This authority is committed to the Primary/Home Authority Principle and acts as Home Authority for 8 food manufacturers in the county borough. Five of these businesses have signed formal Home Authority Agreements. These are recognised as Proactive Home Authority companies.

Other food businesses in the area are not formally recognised as Home Authority businesses but the authority will act as Home Authority in relation to requests for service from either the company or another enforcement authority. These are recognised as Reactive Home Authority businesses.

The proactive agreements specify that meetings will be held with company representatives at least once a year, or when necessary, in order to provide up to date guidance, advice on new legislation or emerging trends, etc.

The Authority will consider participation in the Primary Authority Scheme if approached by a business. To date the Authority has not been approached by any businesses.

The Food Safety Estimated Resources required to deliver this service is 0.2 F.T.E
Food Standards Estimated Resources required to deliver this service is 0.4 F.T.E

3.8 Advice to Business

This authority responds to all requests for service and information. Officers endeavour to provide the best and most current information available.

The website provides information for the public and traders at:

www.caerphilly.gov.uk

When new legislation and guidance etc. is made available, information is provided to the most appropriate target groups by the most effective means, e.g. trade seminars, mail shots, e-mails, press releases and social media etc.

Information and advice on food safety and hygiene is given during every food safety intervention. Inspection reports are provided following every intervention, and in addition to detailing contraventions and legal requirements, information is also supplied relating to best practice advice.

Every opportunity is taken to promote the introduction and use of HACCP within food premises. Food business operators (FBOs) are given the option of utilising various Food Safety Management Systems including Safer Food Better Business (SFBB). Training and coaching visits have been provided for many FBOs from the catering sector in particular to those businesses that have received a low food hygiene rating.

Information is made available for businesses to access training courses, such as the level 2 and 3 food hygiene courses, run by local service providers.

Information and advice on the Food Hygiene Rating Scheme is provided to businesses during interventions and details are also available on the website. New businesses are also provided with information when they submit a food registration. Businesses that have been awarded a 5 Food Hygiene Rating are promoted via social media.

It is anticipated that in excess of 240 requests for advice on food safety will be received annually.

Food Standards

Information and advice on Food Standards compliance is routinely given during Food Standards interventions. Businesses are regularly signposted to various sources of information, including Welsh Heads of Trading Standards (WHoTS) and FSA guidance and training resources.

Trading Standards continues to receive requests for service in relation to Food Standards. This ranges from simple enquiries to those that require complex, technical advice. The service advises major manufacturers, multi nationals, small/micro businesses that trade from home, on-line and at temporary events as well as internal CCBC Catering Services. The advice required is often of a complex and/or novel nature.

Every year as part of the business planning process the Trading Standards Service carries out a strategic assessment for the year ahead. During the process a comprehensive evaluation of local needs, internal drivers, emerging issues, national enforcement priorities and trends is undertaken and service priorities are set.

Almost 6 years ago legislation was enacted that requires food businesses to provide accurate information regarding the presence of 14 allergens in the food they provide. This subject continues to be a local and national education and enforcement priority.

This year it is intended to undertake a trade allergen educational survey. During the visits, a multi-lingual poster previously developed to aid consumers inform businesses of their allergies will be given to Food Business operators to display front of house.

Food Business Operators and staff will also be shown a digital allergen educational resource on how to comply with the laws relating to Allergens. The resource is available for public viewing on YouTube. The links will be shared with businesses who may wish to use it as a training aid. This innovative approach to providing business advice also continues to be used routinely during interventions.

In conjunction with Catering Services, Trading Standards will deliver internal Allergen awareness refresher training to CCBC catering staff.

It is planned to re-launch the said Allergen training resource and complete and promote digital multilingual educational resources on colours and menu descriptions. Consideration will be given to producing a further resource on traceability and freezing down of food.

The Estimated Resources required to deliver this service is 0.8 F.T.E

3.9 Food Safety & Hygiene Sampling

Sampling undertaken by the Food Safety Team (both surveillance and targeted) is undertaken to protect public health and to improve the microbiological quality of food.

The sampling programme includes:

- a) Welsh Food Microbiological Forum programmes;
- b) Approved premises;
- c) PHE programmes;
- d) Risk based sampling;
- e) Intelligence lead;
- f) Imported foods.

The proactive sampling programme is based on a monetary allocation from Public Health Wales. Caerphilly has an allocation of £13,525.

The Food Safety Team plays an active role in the Welsh Food Microbiological Forum. The Forum's main strengths are the ability to produce a co-ordinated food-sampling programme for the whole of Wales, which allows standardisation of protocols, pooling of data and the sharing of information derived from it.

Programmed sampling is undertaken weekly, unless circumstances dictate otherwise. Adverse sample results will require follow-up visits/action.

Samples in connection with complaints and alleged outbreaks of food poisoning may be submitted to the laboratory at any time.

Microbiological samples are submitted to a Food Examiner at Public Health Wales, Cardiff Laboratory. Extraneous matter and chemical etc. samples are submitted to the Public Analyst.

It is anticipated that the service will sample in excess of 450 products in 19/20. A sampling plan outlining the workload for 2019/20 has been devised, and is attached at

Appendix II. The samples originating from complaints are totally responsive and therefore the estimated figure of 5 is based on previous year's trends.

The Estimated Resources required to deliver this services 0.2 F.T.E

3.10 Food Standards Sampling

Food Standards sampling (both initiative and targeted) is undertaken to ensure food is safe and it is what it says it is.

The sampling programme includes:

- FSA/WHoTS projects
- Home Authority samples
- Intelligence led, risk based initiative samples
- CCBC Catering/Procurement samples
- Imported food as and when identified

Non-programmed samples (complaint/initiative samples) are submitted to the Public Analyst periodically. In some circumstances it may be necessary for samples to be examined by an independent expert. The samples originating from complaints are responsive and are taken in accordance with the officer's professional judgement.

Hundreds of screening samples are routinely taken to check compositional or labelling claims, particularly for alcohol authenticity during the inspection of licensed premises.

Adverse sample results could result in the following action:

- Trader advice and guidance
- Primary Authority/Home Authority referral
- Further sampling activity and/or enforcement action

Any pursuant investigation is conducted in accordance with the authority's Quality manuals and Enforcement Policy.

The Estimated Resources required to deliver this service is 0.7 F.T.E

3.11 Control and Investigation of Outbreaks and Food Related Communicable Disease

The authority has an Outbreak Control Plan that follows the framework established in the All Wales Outbreak Control Plan agreed by the Directors for Public Protection Wales. The Caerphilly Plan was revised in December 2015. The Head Public Protection, Community and Leisure Services has responsibilities for the Communicable Disease Control and Outbreak Control functions, though in practice this function is devolved to the Environmental Health Manager/Senior Environmental Health Officer and the Food Safety Team. The Authority has a Lead Officer for Communicable Disease who attends the Lead Officer training programme; additional officers also attend the training when places are available.

This authority investigates all reported cases of confirmed and suspected food poisoning. Appropriate arrangements are in place to liaise with health authorities and other related agencies. This authority receives notifications via Tarian and additionally direct from GP surgeries, and members of the public. All case records are recorded on the Tarian database.

All reported cases are investigated via officer visits with the exception of Campylobacter where cases receive a postal questionnaire.

It is anticipated that in excess of 270 notifications of communicable disease will be received and investigated annually.

The Estimated Resources required to deliver this service is 1.4 F.T.E

3.12 Food Safety Incidents

All food officers have access to the Internet and e-mail facilities. Contact details for all officers have been forwarded to the Food Standards Agency, thus allowing direct communication for the distribution of food alerts etc.

If Officers suspect or have confirmed that a food incident is likely to, or has originated from within the county borough, appropriate action will be taken in line with the Food Incidents and Hazards procedure.

Officers receive notifications via RIAMS daily. Food Alerts for Action are stored electronically with a hard copy of the action taken kept on file.

It is anticipated that the authority will receive in the region of five food incident notifications annually that require action.

Both the food hygiene and standards teams take allegations of food fraud seriously and will undertake investigations as necessary. Any intelligence received is recorded and disseminated to the National Food Crime Unit.

The Estimated Resources required to deliver this service is 0.1 F.T.E

3.13 Liaison with Other Organisations

Close liaison exists between all twenty-two local authorities in Wales through the Directors of Public Protection Wales (DPPW), its Food Standards and Environmental Health Groups and their Expert Panels.

Two Panels deal specifically with food issues, the Food Safety Expert Panel and the WHoTS Food Standards Labelling Group. The authority is represented on the Food Safety Expert Panel and the Welsh Food Microbiological Forum (WFMF) and contributes to work of the Food Standards Labelling Group. Officers also actively participate in the South East Wales Food Safety Task Group, FHRS Steering Group, the Greater Gwent Food Standards Group and the DPPW Allergens working group. Food officers also attend the South East Wales Communicable Disease Liaison Group.

Close liaison is maintained with the Food Standards Agency (FSA), the Public Analyst, Public Health Wales and the Communicable Disease Surveillance Centre (Wales).

Officers also liaise with other organisations such as the National Food Crime Unit, Home Office Immigration, Aneurin Bevan Health Board and the Care and Social Services Inspectorate (Wales) when necessary.

Formal consultation networks are established within the Authority in respect of both planning and building control, ESAG and licence applications including Street Trading and TENS.

The Estimated Resources are required to deliver this function is 0.55 FTE

3.14 Food Promotion

- Food Safety Officers will continue to target caterers regarding the importance of Food Safety Management systems.
- Food Safety Officers will continue to promote and participate in the Food Hygiene Rating Scheme.
- The teams will participate in Food Safety and Allergy Awareness weeks.
- The Food Standards team will continue to promote awareness and understanding of the law relating to food allergies.
- In conjunction with Catering Services, the Lead Food Standards Officer will deliver internal Allergen awareness refresher training to CCBC catering staff.
- Food Standards Officers will continue to use the digital multi lingual Allergen educational resource produced by them during interventions.
- The Food Standards team will distribute to caterers a poster designed to aid allergy sufferers communicate their allergies to businesses.
- Both of the above allergen resources will also be made available internally to Caerphilly CBC catering establishments.
- The Food Standards team will re-launch their digital multi lingual Allergen training resource. They will also complete and promote further digital multilingual educational resources on colours and menu descriptions. The production of a resource on traceability and freezing down of food will be considered.
- Both teams will continue to post information on the Caerphilly website, Facebook and Twitter, and publish timely and topical articles in the Caerphilly “Newslines” and local press including the results of any prosecutions.
- Opportunities are taken, whenever possible, to promote food hygiene, food standards and healthy eating. This is achieved by distributing information including leaflets and posters and sign posting people to on line materials and training resources.
- Talks on food issues to individual organisations and groups will be undertaken upon request.

If any food promotion activity is carried out we will consider carrying out an appropriate evaluation of that project to assess its effectiveness.

The Estimated Resources required to deliver this service is 0.25 F.T.E

4. Performance Management

4.1 Measuring Performance

The Food Safety and Trading Standards teams have developed the following robust performance management system:

- Monitoring of performance against the Food Safety team's operational plan is reported quarterly on the Performance Management System and discussed at the Directorate Management Team meetings.
- Monitoring of performance against the Food Standards team's operational plan is reported quarterly at Trading Standards Management Team meetings. Performance and operational matters are discussed in monthly Trading Standards Management meetings and one to one meetings between the Trading Standards, Licensing and Registrars Manager and the Head of Public Protection, Community and Leisure Services Manager.
- Setting targets for improvement, against the Environmental Health Practice Standards and the Welsh Local Performance Indicators.
- A programme of Personal Development Reviews, which are carried out annually for all staff.

4.2 Benchmarking

Performance Indicators

The National Strategic Indicators for Wales for 2018-19, PPN/009 – the percentage of food premises that are broadly compliant places Caerphilly's performance at 96%.

Full details of performance against National Strategic and Core Performance Indicators are available on the Wales Data Unit website at:

<http://www.dataunitwales.gov.uk/data>

Although no longer a national performance indicator, the authority records the percentage of high risk businesses that were liable to a programmed inspection or alternative inspection activity, for Food Standards and Food Hygiene. Data for 2018/19 place Caerphilly's Performance for both targets at 100%. Additionally the food hygiene team achieved 100% percent of programmed low risk inspections.

5 RESOURCES

5.1 Estimated Resources

To provide the service outlined in Chapter 3 of this report would require the following numbers of operational staff. Estimates are full time equivalents (F.T.E.).

SERVICE ACTIVITY	ESTIMATED RESOURCES F.T.E.
Food Safety & Hygiene Interventions	4.2
Food Safety & Hygiene Complaints	0.5
Food Safety & Hygiene Home/Primary Authority	0.2
Food Safety & Hygiene Business Advice	0.4
Food Safety Sampling	0.2
Food Poisoning Outbreaks etc.	1.4
Food Safety Incidents	0.1
Liaison and Promotion	0.5
TOTAL FOOD SAFETY TEAM CURRENT STAFF RESOURCE	7.50
Food Standards Interventions	2.0
Food Standards Complaints	0.2
Food Standards Home/Primary Authority	0.4
Food Standards Business Advice	0.4
Food Standards Sampling / incidents	0.7
Food Hygiene Primary Production Inspections	0.1
Liaison and Promotion	0.3
TOTAL TRADING STANDARDS TEAM	4.1
OVERALL TOTAL	11.6

Current estimated allocation of staff is 11.6 F.T.E.

Team	Actual number of FTEs for 19/20	Estimated required FTEs	Variance
Food Safety	7.4	7.5	*-0.1
Food Standards	3.3	4.1	-0.8
Total	10.7	11.6	-0.9

* A member of the team has temporarily reduced their working hours

5.2 Financial Estimates

The estimated financial expenditure on food enforcement for 2019/2020 is:

Food Safety & Hygiene

	2019/20
Salaries	288,540
Standby	4,300
Overtime	3,700
National insurance	25,969
Superannuation	60,591
Apprenticeship levy	1,442
Specialist/technical equipment	1,200
Proactive initiatives	1,100
Miscellaneous expenditure	1,600
Car allowances	5,100
Insurance recharge	2,388
Corporate & democratic	800
External fees –sampling etc.	1,100
TOTAL	379,080

Food Standards

Trading Standards Officers routinely carry out Food Standards interventions combined with other Trading Standards enforcement activities. Consequently it is not possible to provide an accurate breakdown of the full cost to deliver the food standards function.

The estimated financial expenditure on Food Standards enforcement is £161,953. The figures include on-costs, travelling allowances and sampling costs.

The total estimated financial expenditure for food law enforcement for 2019/20 is:

	£
Food Safety & Hygiene	379,080
Trading Standards	<u>161,953</u>
TOTAL	541,033

5.3 Staffing Allocation

The Food Teams comprise of the following officers:

Food Safety

Post Title	EHORB Registration	Food Safety Experience
Senior EHO	1992	27 years
District EHO	1994	25 years
District EHO	1997	22 years
District EHO	1991	22 years
District EHO	2000	12 years
District EHO	2000	18 years
District EHO	2004	15 years
District EHO	2005	14 years
District EHO	2010	9 years
District EHO	-	16 years (food sampling now qualified EHO)

Food Standards

Post Title	Food Authorised	Food Standards Experience
Senior TSO	1995	24 Years
Senior TSO	1993	26 Years
TSO	2007	12 Years
TSO	2007	12 Years
TSO	2007	5 years
SFTO	1995	24 Years
SFTO	2005	14 Years
SFTO	1995	24 Years

5.4 Training

All officers will receive adequate and relevant ongoing training in order that they achieve the required hours CPD as specified in the Food Law Code of Practice. Training needs will be determined through annual officer Personal Development Reviews and Peer audits.

Both the Food Safety Expert Panel and the WHoTS Food Standards Labelling Group have advised the FSA of officer training requirements for 2019/20.

6. QUALITY ASSESSMENT

6.1 Quality Systems

There are currently 3 quality systems in operation, which aim to define and control the enforcement of food in the county borough, one for Food Safety and two for Food Standards.

The Quality systems follow an ISO 9002 style, but are not accredited. The systems were externally audited by the Food Standards Agency in January 2016.

The quality systems include:

- Policies/procedures
- Peer review
- Management meetings
- Management review
- Personal Development Reviews

Food Hygiene and Standards operational procedures are reviewed regularly and updated as necessary.

A new edition of the Food Law Code of Practice Wales was published and further amendments are expected to cover EU exit. This will necessitate a review of the Food Hygiene and Standards operational procedures. Work streams as a result of Regulating Our Future will also trigger further reviews.

7. REVIEW

7.1 Review Against the Service Plan

The Food Enforcement Service has reviewed its performance for 2018-2019 as part of its performance management process. The review included:

- Analysis of service performance
- Comparison of service performance against service plan
- Results of system audits
- Changes in legislation etc.
- Customer feedback

Details can be found in Appendix I

7.2 Identification of Variances from the 2018-19 Plan

Appendix I contains the results of the review and the reasons for any variances from the 2018-2019 Service Plan.

Monitoring of the performance of the service takes place quarterly for food safety and food standards. Variances against key performance indicators are reported via the performance monitoring system and to the Directorate Management Meetings on a quarterly basis.

7.3 Areas for Improvement for 2019-20

Following a review of the service, the following issues are identified as areas for improvement:

Food Safety

- To continue visits to check the display of food hygiene ratings and the presence of the statement on menus and to take any necessary enforcement action.
- The APP database will continue to require regular scrutiny to ensure the Authority is able to produce accurate data direct to the LAEMS database.
- The team to undertake a risk rating consistency exercise.
- Review the operational procedures when the new Food Law Code of Practice is issued.
- To ensure that all programmed low risk food businesses which fall within the scope of the Food Hygiene Rating Scheme are inspected in order to issue a food hygiene rating.
- To ensure that new businesses and routine inspections are undertaken within 28 days.

- Report food intelligence to aid in raising the profile of national food crime.
- Respond to consultations as necessary.
- Continue to ensure preparations are in place for Brexit in relation to authorisations etc.
- Review the home catering pack and develop guidance as necessary.
- Review the prosecution procedures in conjunction with Trading Standards.

Communicable Disease Control

- To continue the training plan for officers involved in outbreak investigation, control and recording. This includes lead officer training and software use.
- To continue cascading relevant information, new guidance and emerging trends etc., to all relevant officers.
- Review the operational procedures and Outbreak Plan.

Websites

- Review the links on the website.

Food Standards

- Check the display of food hygiene ratings and the presence of the statement on menus during Food Standards interventions and report any non-conformances to Food Safety officers.
- Ongoing scrutiny of the database including a review of the Food Standards action and reporting configuration to ensure the Authority is able to produce accurate data upload to the LAEMS database.
- Review the Food Standards Quality Manual following implementation of the new Food Law Code of Practice and any change in the Food law regulatory landscape.
- Continue with administrative preparations for Brexit to ensure Officers are appropriately authorised.
- Ongoing review of the Food Standards intervention data capture forms to ensure they are fit for purpose.
- Devise and implement an operational procedure on Allergen enforcement protocol.
- Ongoing Food Standards Officer continual professional development training to enable officers to proactively develop and enhance their abilities to enforce Food Standards legislation.
- Continue to develop and promote business support tools to aid compliance with the Food Information Regulation 1169/2011.

- Report food intelligence to aid in raising the profile of national food crime.
- Update the website to comply with statutory changes as necessary.

APPENDIX 1

SERVICE DELIVERY REVIEW FOR 2018-2019

1. Summary of Main Issues Occurring in 2018-19

Food Safety

- **Interventions**

During 2018/2019 the following interventions were carried out:

- 608 programmed inspections
- 18 re-rating inspections
- 132 non programmed inspections
- 191 inspections to new businesses
- 287 follow-up visits
- 193 visits for checking the display of food hygiene ratings
- 87 food sampling visits
- 87 advisory visits
- 139 visits for other purposes

100% of inspections to high and low risk premises were achieved. 96% of registered food businesses within the county borough were broadly compliant at the end of the year.

- **Requests for Service**

295 requests for service were received; these include food complaints, allegations of premises with poor hygiene etc. and advice.

- **Food Incidents/Food Alerts/Product Recall Information Notices**

The Section received 82 FSA Product Recall Information Notices.

- **Food Hygiene Rating Scheme**

The Food Hygiene Rating Scheme (FHRS) became mandatory in Wales on 28th November 2013 replacing the voluntary scheme which had been in operation since 1st October 2010. The Food Hygiene Rating (Wales) Act 2013 makes the implementation of the scheme by food authorities and the display of food hygiene ratings by businesses mandatory. The primary purpose of the scheme is to allow consumers to make informed choices about where they eat, where they purchase food and, through this, to encourage businesses to improve hygiene standards.

Ratings for all businesses included in the scheme are published on the national website at www.ratings.food.gov.uk

Over 1350 businesses, located within the county borough have current food hygiene ratings. The breakdown of ratings issued is shown in the table overleaf:

FHR	0	1	2	3	4	5
Primary Producer	0	1	0	2	0	4
Manufacturers/Packers	0	2	0	7	7	31
Importer/Exporters	0	0	0	0	1	1
Distributors	0	0	0	1	5	8
Retailers	1	9	7	32	69	117
Restaurants & Caterers	1	17	22	146	288	581
TOTAL	2	29	29	188	370	742

During 2018/19 8 fixed penalty notices were served for non-display of food hygiene ratings at premises.

In November 2016 the Food Hygiene Rating (Promotion of Food Hygiene Rating) (Wales) Regulations 2016 were introduced. These regulations are intended to promote a businesses' food hygiene rating by ensuring the FBO includes the following bilingual statement on any publicity material which includes price together with how to place an order.

“Ewch i food.gov.uk/ratings i ganfod sgôr hylendid bwyd ein busnes neu gofynnwch inni beth yw ein sgôr hylendid bwyd wrth archebu. /Go to food.gov.uk/ratings to find out the food hygiene rating of our business or ask us for our food hygiene rating when you order”.

During 2018/19 12 fixed penalty notices were served for not displaying the correct statement on their publicity material.

A project was undertaken jointly by Blaenau Gwent and Caerphilly County Borough Councils during 2018 in respect of assessing levels of compliance with certain legal requirements placed upon food businesses under the statutory Food Hygiene Rating Scheme that is currently operating in Wales. Visits were undertaken to check levels of compliance with the requirement to display a valid food hygiene rating and also, where applicable, to check compliance with the promotional material requirements for publicity materials relating to that business. A total of 98.7% of all businesses assessed demonstrated full compliance with the food hygiene rating display requirements; a total of 52.77% of all businesses assessed that were in scope of the promotional material requirements and which had a menu available for review at the time of the visit demonstrated full compliance with the food hygiene rating display requirements. The premises which had been identified in the Blaenau Gwent area as being non-compliant with the promotional material requirements received a follow-up visit to check that the issues of non-compliance had been resolved. No further action was necessary. Caerphilly County Borough Council wrote to all non-compliant premises following the survey. Follow up visits were also undertaken and 4 fixed penalty notices were served.

The team also took part in the National Food Hygiene Rating Scheme consistency exercise co-ordinated by the Food Standards Agency and the Wales Food Hygiene Rating Scheme consistency training events. These events are essential to ensuring a consistent approach to the issuing of FHRs across Wales.

- **Sampling**

450 food samples were taken throughout the year. The team participated in 3 all Wales sampling programmes in addition to the shopping basket survey. The surveys were developed by the Welsh Food Microbiological Forum and carried out throughout Wales. The first survey was undertaken as a follow up to a survey undertaken by the

WFMF in 2016 which found that 11.8% of ice-cream dispensed by machine was unsatisfactory for one or more microbiological parameters. The survey commenced in July and ran until September 2018. The results for this survey are currently being analysed by PHW and a report will be released in due course.

The second survey was in response to the recent withdrawal by some major supermarkets of frozen vegetables because of concerns about links with cases of Listeriosis in Europe. The FSA reported in July 2018 that frozen sweetcorn and other frozen vegetables were the likely source of an outbreak in five countries, including the UK. The survey commenced in November 2018 and ran until April 2019. The results for this survey have been analysed by PHW and a draft report will be released in due course.

The third survey was to address the fact that the UK currently imports much of its food and feed. With the uncertainty surrounding trade deals with European member states, a survey of food produced outside the European Union could provide some useful information on the microbiological quality, from food sources that the UK may be more reliant on in future. The survey commenced in November 2018 and ran until April 2019. The results for this survey are currently being analysed by PHW and a report will be released in due course.

- **Communicable Disease Control**

The section received 270 sporadic communicable disease notifications and responded to 6 viral outbreaks. All relevant diseases were investigated.

- **Health Education / Promotion**

Food Safety Week took place between the 4th - 10th June 2018. The theme for this year centred around *The People Who Protect Your Plate* - a theme which celebrates our combined workforce, the work we do and how that impacts consumers and their plates. This is an area which is somewhat overlooked but deserved a light shone on it. During the course of food safety week the Team used social media to highlight the work carried out by officers on a day to day basis.

- **HACCP/Food Safety Management Systems**

This year's project was developed by an all Wales working group in conjunction with the Food Standards Agency. The aim of the project was to deliver a programme of targeted interventions at food businesses with a food hygiene rating 0-2 to secure improved business compliance and develop an evidence base of the impact of such interventions on non-compliant business. The categories of premises identified were:

- Pubs/ Bars/ Nightclubs
- Restaurants/ Cafe/ Canteen
- Mobile Food Premises
- Other Catering Premises
- Hotel / B & B`s
- Retailers (Other)

The content of the targeted interventions were considered to be aimed at improving food hygiene practices, identifying and signposting businesses to suitable training providers, and improving food safety management procedures. 9 businesses participated in the project and once these businesses have received an inspection following their targeted intervention details of their food hygiene rating will be forwarded to the Food Standards Agency for inclusion in the project evaluation.

The visits were carried out by officers within the food team and were funded by monies from a successful bid received from the Food Standards Agency.

- **Customer Satisfaction Survey**

A survey was undertaken of a number of food businesses following a routine food hygiene inspection. The survey revealed that 100% of businesses surveyed were satisfied with the outcome of the visit and overall level of service provided.

- **Temporary Event Notices (TENS)**

200 applications were responded to during 2018/19. This involves liaising with the event organisers, issuing advice and carrying out site visits.

During the year events arose that impacted on resources, these included:

- **Food Incident**

The investigations into the food incident in November 16 relating to “off smelling” sliced cooked chicken continued to take up a considerable amount of resource from several officers within the team in relation to the preparation of the legal case. The case was discontinued in October 18 due to a decision by the district judge not to allow an extension of time for a second expert witness report to be finalised.

- **Events**

There has been a considerable increase in the number of events organised in the area. This has had a significant impact on the team with officers having to carry out a lot of preparatory work prior to the event, followed by attendance at the event in order to carry out interventions. This workload has increased with the introduction of the Food Festival and similar events organised to boost tourism.

- **Consultations**

There were a number of consultations/workshops that required input from the team. These take up a considerable amount of time but are important in influencing policy and legislation. These included the FSA’s Regulating our Future, The Food Law Code of Practice (Wales), proposed Changes to the UK Health and Identification Marking, proposed Approach to Retained EU Law for Food and Feed Safety and Hygiene, The Operational Policy for the approval of meat establishments undertaken by the FSA and Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry.

- **Investigations**

There were three major food complaint investigations undertaken during the year which lead to the instigation of legal proceedings. Two of these cases resulted in successful prosecutions and the third is currently progressing through the legal process.

Food Standards

Interventions

To ensure the public are afforded the most protection; resources were allocated to premises that posed the highest risk. The 2018/2019 intervention statistics are provided on page 39.

- **Food Complaints & Service Requests**

51 food complaints were received and investigated in relation to food standards. 64 service requests were also received and actioned.

- **Food Incidents/Alerts/Product Recall Information Notices** Food Standards officers submitted 4 Food Incidents to FSA England/Wales relating to food labelling issues on products found during inspection.

- **Projects, Surveys & Sampling**

37 samples were taken throughout the year which were submitted to the Public Analyst. 30 were reported to be satisfactory and 7 were reported as unsatisfactory. The range of samples included Bakery products, meat, dairy, prepared dishes, fish, materials and articles in contact with food, non alcoholic beverages, nutritional products, CBD Oil and vape juice. The actions taken in relation to the non-compliances reported by the Analyst are summarised on page 40.

Following an investigation 5 Simple Cautions were issued in respect of unsatisfactory samples taken during 17/18. These related to claims to meat products falsely described as “Slimmer’s Pack”, “Low Fat” and “Extra Lean”.

Food Standards Officers took part in Operation Opson VIII, a targeted action led by the EU Commission with the support of Europol run across 16 EU Member States. This year’s operation looked at organic food products and the growing trend of products falsely claiming to be organic. As verification of organic status is not easily done through sampling and analysis, the project focus was on traceability, certification and paperwork.

21 products making organic claims were checked for appropriate labelling and traceability. 16 referrals were passed to Home Authorities for investigation.

Hundreds of screen tests were routinely carried out on alcohol in pubs and clubs. No adverse results were obtained.

The digital multi lingual Allergen resource developed by Food Standards officers in association with Communications for the catering trade is used routinely during interventions and promoted as a training aid for caterers. Work continued on producing further colours and menu descriptions resources. However due to technical issues and reduced Communications Department staffing they were not completed. FSA funding was secured to outsource the menu description video. The colours resource will be completed by Communications and both will be launched during 2019/20.

- **Business Satisfaction Survey**

A Business Satisfaction survey was carried out following Trading Standards programmed inspections (food and non-food businesses). 98% of respondents said they were satisfied with the service they received. One trader was dissatisfied with the outcome of the inspection. Further advice and guidance on compliance with the law was given.

- **Temporary Events**

Advice and guidance was sent to all Food Business Operators prior to events via the CCBC Events team. Food Standards Officers continue to attend outdoor markets, festivals and fairs whenever resources permit.

- **Consultations**

The late Lead Officer for Food Standards, who was also the Lead Officer for WHoTS, attended and chaired a number of regional and national food forums. He contributed to a number of key food consultations on behalf of the authority and as part of the regional and national groups of which he was a member. These included the FSA's Regulating our Future, The Food Law Code of Practice (Wales), proposed Approach to Retained EU Law for Food and Feed Safety and Hygiene, and Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry. This work is time consuming but valuable to influence and inform policy and legislation.

- **Liaison & Continual Professional Development**

The Lead Officer for Food Standards/Senior Trading Standards Officer (Commercial Services) organise, facilitate and provide Food Standards, internal, regional and national training. This aids local authority liaison, consistency of enforcement and the continual professional development of officers. During the year the Senior Trading Standards Officer gave three presentations to Food Standards colleagues in England and Wales as part of a course organised by the FSA on Food Supplement enforcement.

- **Staffing**

The year was very challenging for the Food Standards team. The Authority lost a long serving, experienced Lead Food Standards Officer who retired on ill health and sadly passed away shortly afterwards. The officer represented the authority on a number of national panels and forums will be a huge loss locally, regionally and nationally. The majority of the last 6 months of the officer's employment was taken up with an in depth investigation which is in the court process. Whilst this officer worked on the investigation, the other Food qualified officers absorbed his workload as well as their own.

Food Hygiene - Areas for improvement were identified in the 2017–18 plan as:

Food Safety

- To continue to promote the Food Hygiene Rating Scheme. To implement the Food Hygiene Rating (Promotion of Rating) (Wales) Regulations 2016 which came into force on the 28th November 2016 to include informing businesses of the new requirements.
- The APP database will continue to require regular scrutiny to ensure the Authority is able to produce accurate data direct to the LAEMS database.
- Implement any new guidance/legislation introduced by the FSA.
- The team to undertake a risk rating consistency exercise.
- Review the operational procedures.

- To ensure that all programmed low risk food businesses which fall within the scope of the Food Hygiene Rating Scheme are inspected in order to issue a food hygiene rating.
- To ensure that new businesses and routine inspections are undertaken within 28 days.
- To undertake the Early Years Project which due to resource issues was not carried out in 2016/17.
- To implement the actions in the FSA audit Action Plan.

Communicable Disease Control

- To continue the training plan for officers involved in outbreak investigation, control and recording. This includes lead officer training and software use.
- To continue cascading relevant information, new guidance and emerging trends etc., to all relevant officers.
- To continue implementing the new Tarian notification system.
- Review the operational procedures.

Websites

- Update the website as necessary.

Food Standards - Areas for improvement were identified in the 2017–18 plan as:

1. Continue regular scrutiny of the APP database, which is shared with the Food Safety team to ensure the Authority is able to produce accurate data direct to the LAEMS database.
2. Explore the feasibility of implementing FSS Net, the timing of which will depend on whether the authority proceeds with the implementation of a new IMS.
3. Produce an Action Plan following the Food Standards Agency audit in January 2016.
4. Continue to improve data capture during inspections to ensure it is sufficiently detailed and provides a thorough assessment of business compliance.
5. Review the Food Standards Quality Manual procedures and implement a new procedure for Alternative Enforcement Strategies (AES).
6. Undertake Food Standards Officer consistency training focusing on risk rating, data capture, policies and procedures, significant breaches and the recording and disseminating of intelligence.
7. Cascade relevant information, new guidance and emerging trends etc., to all relevant officers.

8. Reduce the intervention deficits for new businesses, medium and low risk rated premises.
9. Continue to promote compliance with the Food Information to Consumers Regulation 1169/2011 (FIC) and inform businesses of the new requirements.
10. Implement any new guidance/legislation introduced by the FSA.
11. Report food intelligence to aid in raising the profile of national food crime.
12. Update the website as necessary to comply with the Welsh Language Act.

The outcomes of the above are reviewed on page 46.

2. Categories of Food Premises

A breakdown of the categories of food premises located within the county borough at the start of the year is provided below:

	Primary Producer	Manufacturers/Packers	Importer/Exporters	Distributors	Retailers	Restaurants & Caterers	Materials & Articles Manufacturers & Suppliers	Total
FOOD SAFETY								
Total premises as at 1.4.2018	4	55	2	18	334	1412	0	1825
FOOD STANDARDS								
Total premises as at 1.4.2018	7	56	2	19	336	1415	2	1835

3. Food Safety & Hygiene Inspections

The inspection programme and frequency of inspection for 2018/2019 was determined as per the Code of Practice.

The PRG count uploaded to APP which forms part of the LAEMS return, identified all premises scheduled for inspection during the financial year. The Service Plan for 2018 - 2023 sets a target of 100% of all high risk food premises to receive an intervention. The table overleaf details the percentage of inspections achieved against targets:

Food Safety & Hygiene Percentage of Inspections achieved against Targets

Category	First Target	Number of businesses closed and down graded during year	Revised Target	Achieved as at 31.3.2018	Not achieved as at 31.3.2018	% Achieved
A	6	1	5	5	0	100%
B	67	7	60	60	0	100%
C	435	45	390	390	0	100%
Total High Risk	508	53	455	455	0	100%
D	78	11	67	67	0	100%
E	108	22	86	86	0	100%
New businesses	199	8	191	191	0	100%
Total Other	385	41	344	344	0	100%
Total Inspections	893	94	799	799	0	100%
Non – programmed inspections	No target set	N/A	N/A	132	N/A	N/A
Verification visits	No target set	N/A	N/A	290	N/A	N/A
FHR display checks	No target set	N/A	N/A	193	N/A	N/A
Sampling Visits	No target set	N/A	N/A	87	N/A	N/A
Other visits	No target set	N/A	N/A	139	N/A	N/A
Re-rating visits	No target set	N/A	N/A	18	N/A	N/A
Grand total Interventions	893	N/A	N/A	1658	N/A	N/A

4. Food Standards Interventions

The Food Standards Intervention programme for 2018/2019 was carried out in accordance with the Food Law Code of Practice (Wales).

The PRG count uploaded to APP which forms part of the LAEMS return identified all premises scheduled for inspection during the financial year. The Service Improvement Plan for 2018/19 set a target of 100% of high risk food premises to receive an intervention, 50% of medium risk rated premises. Low risk premises were targeted for intervention in the year 2018/19.

Details of the number of interventions carried out and the number carried forward are provided overleaf.

Food Standards Interventions 2018/19

Risk Profile	Frequency	No. of Premises	Interventions Due	Achieved as at 31.3.2019	Outstanding as at 31.3.2019	% Achieved
A (High)	12 months	12	12	12	0	100
B (Medium)	24 months	538	171	147	24	86
C (Low)	5 years	906	37	34	3	92
Unrated	–	334	334	299	35	90
Total	–	1790	554	492	62	89

Food Safety Complaints & Service Requests

The following table details the number of complaints received in recent years:

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
Food stuffs	52	54	53	64	57	49
Food Hygiene	56	59	61	77	68	76
Total	108	113	114	141	125	125

The Food Safety service also received 170 other food related service requests.

7. Food Standards Complaints & Service Requests

The following table shows the number of Food Standards complaints and service requests received in recent years:

Food Standards	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
Complaints	48	21	31	39	47	51
Service Requests	16	85	70	123	127	64
Total	64	106	101	162	175	115

8. Primary/Home Authority Principle and Advice to Business

Officers met with all of the Home Authority and Originating Premises during the year. All requests for advice from local businesses on food related matters were responded to within the agreed time scales.

9. Food Safety & Hygiene Sampling

Results of the food sampling programme for 2018/2019 are shown below:

	2016/17 Achieved	2016/17 Unsat	2016/17 Imp Food	2017/18 Achieved	2017/18 Unsat	2017/18 Imp Food	2018/19 Achieved	2018/19 Unsat	2018/19 Imp Food
Routine	349	39	3	405	39	13	450	8	26
Complaints	3	0	N/A	2	2	0	1	1	N/A

1 complaint has resulted in the instigation of legal proceedings.

10. Food Standards Sampling

37 samples were submitted to the Public Analyst during 2018/2019. 30 samples were reported as satisfactory and 7 were unsatisfactory. Trader advice was given in respect of 4 of the non-compliance found and 3 were subject of a Home Authority referral.

Following an investigation, 5 Simple Cautions were issued in respect of meat samples taken in 17/18.

Hundreds of screen tests including alcohol authenticity checks and labelling verification checks were also carried out.

11. Control and Investigation of Outbreaks and Food Related Infectious Disease

It is the policy of this authority to investigate all reported cases of confirmed and suspected food poisoning. The table below indicates the trends over recent years:

Control and Investigation of Outbreaks and Food Related Infectious Disease Trends

	2015/16	2016/17	2017/18	2018/19
Sporadics investigated:-	262	278	277	270
Campylobacter	205	197	206	227
Cryptosporidium	22	40	27	17
E. coli O157	1	0	0	1
Giardia	2	3	9	2
Hepatitis E	7	4	2	1
Legionella	1	5	1	3
Listeria	0	0	2	0
Salmonella	23	21	27	19
Hepatitis A	1	8	3	0
	8 Norovirus outbreaks	6 Norovirus outbreaks	2 Norovirus outbreaks	6 Norovirus outbreaks

12. Food Safety Alerts/Incidents

The Sections received 82 Product Recall Information Notices/Allergy Alerts plus numerous updates during the year and the food hygiene team assisted in 1 Food Alert For Action which originated from a home authority premise.

Food Standards received 90 Product Recall Information Notices/Allergy Alerts and numerous updates throughout the year. Officers reported 4 Food Incidents to FSA relating to foreign labelled food, unclear allergen labelling and two products which contained 'CBD' i.e. cannabidiol, a chemical that may come from cannabis. None of these items originated within Caerphilly CBC.

13. Prosecutions/Simple Cautions

The food hygiene team were involved in 3 major investigations during the year. These investigations have resulted in legal proceedings being instigated against the businesses.

Bargoed Local Store was prohibited from trading as a food following an investigation of a complaint received from a member of the public. The investigation revealed evidence of a rodent infestation and officers subsequently served a Hygiene Emergency Prohibition Notice on the food business operator causing the business to close. Cwmbran Magistrates Court issued a Hygiene Emergency Prohibition Order prohibiting the premises being used as a food business. The Hygiene Emergency Prohibition Order was to remain in force until the infestation had been eradicated and the order lifted by the Council. However, the store continued to trade thus contravening the Hygiene Emergency Prohibition Order. The Food Business Operator pleaded guilty and was ordered to pay a fine of £586, together with prosecution costs of £900, and a £58 victim surcharge.

Kentucky Fried Chicken (GB) Ltd, was prosecuted following an investigation into a complaint received from a member of the public. The investigation revealed that a three piece variety meal had been purchased by the complainant using the drive thru at KFC Blackwood, Unit 1 North Court, Blackwood. When starting to eat the original recipe chicken portions it became apparent the chicken was not cooked. The chicken

portions were sent for analysis and it was determined that all three pieces of chicken on the bone had not been thoroughly cooked. Further visits to the restaurant and assessment of documentation provided by the company revealed failures in the company's procedures giving rise to the sale of undercooked chicken. The case was heard over a 3 day trial at Newport Magistrates Court between 11th and 13th July 2018. On Friday 13th July 2018 Kentucky Fried Chicken (Great Britain) Ltd were found guilty to two offences: One of placing unsafe food on the market contrary to Article 14(1) Regulation 178/2002 and Regulation 4(b) of the General Food Regulations 2004; and failure to implement safe cooking procedures as set down in Article 5(1) Regulation (EC) No. 852/2004 and contrary to Regulations 17(1) and 17(2) of schedule 2 to the Food Hygiene (Wales) Regulations. In his judgement the District Judge highlighted numerous issues with KFC procedures, including failure to implement correct staff training procedures and lack of documented checks on oil levels in the pressure fryer.

The company were ordered to pay a fine of £35,000.00, together with prosecution costs of £6,122, £170 victim surcharge and £500 compensation to the complainant

Peters Food Service Ltd, trading at Bedwas House Industrial Estate, Bedwas was prosecuted following a complaint received from a member of the public. The investigation revealed that a Peter's Chicken and Bacon Premier Slice had been purchased which contained a hard red plastic object. On examination it was apparent that the object was a metal detector test piece protruding from the filling. The premises was visited and an audit of the Company's metal detection test procedures was carried out. The investigation identified shortfalls in the company's procedures and instances where the procedures were not followed by relevant staff thus enabling the metal detection test pack to leave the factory and enter the food chain. Peters Food Service Ltd pleaded guilty to one offence of placing food on the market that was unsafe contrary to Article 14(1) Regulation 178/2002 and Regulation 4(b) of the General Food Regulations 2004. The company were ordered to pay a fine of £25,000.00, together with prosecution costs of £2,176.25 and £500 compensation to the complainant.

Mr Chung former proprietor of the Fortune House, Bargoed was arrested following a warrant issued in 2012. Mr Chung is now running a food business located within Bridgend CBC. Mr. Chung attended and pleaded guilty to 6 offences of Regulation 852/2004 in relation to cleanliness, lack of facilities for cleaning equipment, no provision of hot water at the wash hand basin and risk of contamination to foodstuffs. In reaching the sentence the Magistrates confirmed that they were taking into account the fact that the offences dated back to 2012. Mr. Chung was sentenced to a conditional discharge for a period of 12 months. £300 costs were awarded and Mr. Chung was also ordered to pay a £20 surcharge.

A local butcher accepted 5 Simple Cautions for breaching Regulation 5(1) of the Nutrition and Health Claims (Wales) Regulations 2007. The food standards offences were in relation to the use of unauthorised health claims "Slimmer's Pack", "Low Fat" and "Extra Lean," applied to meat products sold as part of a 'Slimmer's pack'.

14. Liaison with Other Organisations

Close liaison was maintained between all twenty-two local authorities in Wales through the Directors of Public Protection Wales (DPPW), its Environmental Health and Trading Standards Groups and their Expert Panels.

15. Food Promotion

Over 1300 businesses, located within the county borough have current food hygiene ratings. During 2018/19 20 Fixed Penalty Notices were served for non-display of food hygiene ratings at premises and for not displaying the food hygiene rating statement on menus.

- Opportunities were taken to promote food hygiene, healthy eating and food standards by the distribution of leaflets, posters etc.
- Several press releases were issued during the year including “Food Safety Week” and “Look before you book this Valentine’s Day”. Facebook and Twitter were also used to publicise businesses that were awarded a 5 food hygiene rating and to further publicise product recall information notices.
- Environmental Health Officers assisted food businesses to improve their food hygiene rating by rolling out an all Wales project to improve implementation of food safety management procedures in 9 businesses which had a food hygiene rating of 1 or 2 by targeting them with practical on site interventions.
- Food Safety Week took place between the 4th - 10th June 2018. The theme for this year centred around *The People Who Protect Your Plate* - a theme which celebrates our combined workforce, the work we do and how that impacts consumers and their plates. This is an area which is somewhat overlooked but deserved a light shone on it. During the course of food safety week the Team used social media to highlight the work carried out by officers on a day to day basis.
- Food is an area which is somewhat overlooked but deserved a light shone on it. During the course of food safety week the Team used social media to highlight the work carried out by officers on a day to day basis.
- Food Allergy Awareness week took place between 13th – 19th May 2018. It’s aim is to help raise knowledge and understanding of different food allergies and anaphylaxis. Food Allergy Awareness Week brings together multiple organisations, charities and individual. All of whom highlight the importance of allergen awareness and aim to reach a wider audience. During the week Communications promoted the multi lingual Allergen resource developed by Food Safety officers and funded by the FSA.
- The aforementioned videos, available for public viewing on YouTube are used by officers during inspections. The links have been provided to traders and Catering Services so they can be used as a staff training aid. They have been acknowledged as an innovative approach to Business advice in the 2018 WHoTS ‘Trading Standards at your Council Members Handbook’.
- An Allergen multi lingual communication tool poster designed by Food Standards Officers in association with Communications, funded by the FSA was launched. The design files were made available on the FSA website for other authorities to add their logos and use. The posters have been supplied to Catering Services and continue to be distributed to caterers free of charge during interventions.
- Local authority delegates were told about the poster and the videos during a WHoTS Allergen Workshop in June 18. Both resources were forwarded to the National Food

Hygiene Focus Group, who were looking for examples of allergen work to share on the Knowledge Hub to identify as good practice for dissemination.

- Enquires were received from FSA Wales and FSA England to use the poster and video resources in national allergen toolkits.
- Information was also received that the poster generated interest from representatives of numerous child care organisations during an updated version of the Best Practise Guidance for Child Care Settings in Wales consultation event in June 18. It was felt that the poster would be a great help to raise awareness of allergens when catering for children.
- Social media continued to be a useful tool in highlighting the authorities Food Hygiene and Standards work as well as publishing food alerts.

16. Quality Assessment

To maintain competencies and uniformity of enforcement, staff attended various training events during the year. Staff also undertook peer audit visits.

17. Review

Analysis of service performance

The service performance is continually reviewed, and analysed in order to assess compliance with the plan and to identify areas of weakness and therefore areas of improvement.

Comparison of Service performance against service plan

The service performance is monitored every quarter. The outcomes are recorded on the authority's performance management system.

Customer feed back

The Food Safety and Trading Standards services undertook annual customer satisfaction surveys. The surveys revealed that 100% of customers were satisfied with the outcome of their visit and overall level of service provided.

18. Review of Areas for Improvement for 2018-19

As a result of a review of the service at the end of 2017-18, the following issues were identified as areas for improvement during 2018-19:

Food Safety

- To continue visits to check the display of food hygiene ratings and the presence of the statement on menus and to take any necessary enforcement action.
- ✓ 193 visits were carried out to check the display of food hygiene ratings. 20 Fixed Penalty Notices were served for non display of stickers and statement on menus.

- The APP database will continue to require regular scrutiny to ensure the Authority is able to produce accurate data direct to the LAEMS database.
- ✓ Scrutiny of the database was carried out throughout the year.

- The team to undertake a risk rating consistency exercise.
- ✓ The team participated in National and regional food hygiene rating consistency exercises.

- Review the operational procedures in line with the newly issued Food Law Code of Practice.
Procedures were not reviewed during the year as the new CoP is awaiting publication and template procedures will then be produced by the FSEP.

- To ensure that all programmed low risk food businesses which fall within the scope of the Food Hygiene Rating Scheme are inspected in order to issue a food hygiene rating.
- ✓ 100% of all low risk businesses were inspected and issued with a food hygiene rating.

- To ensure that new businesses and routine inspections are undertaken within 28 days.
- ✓ Inspections are monitored for compliance and re-prioritised as necessary.

- Report food intelligence to aid in raising the profile of national food crime.
- ✓ Reports are submitted via IDB as necessary.

- Respond to consultations as necessary.
- ✓ A number of consultation responses were submitted during the year.

- Ensure preparations are in place for Brexit in relation to authorisations etc.
- ✓ A report has been drafted and will be submitted to Cabinet when Brexit occurs. Officers have received training on the issue of export certificates.

- Review the home catering pack and develop guidance as necessary.
This was not completed but will be carried forward to 2019/20.

- Review the prosecution procedures in conjunction with Trading Standards.
Due to resource this was not completed but will be carried forward to 2019/20.

Communicable Disease Control

- To continue the training plan for officers involved in outbreak investigation, control and recording. This includes lead officer training and software use.
- ✓ This is ongoing and officers have attended training courses throughout the year.

- To continue cascading relevant information, new guidance and emerging trends etc., to all relevant officers.
- ✓ Appropriate feedback is provided at regular team meetings.

- To continue implementing the new Tarian notification system.
- ✓ Staff have been trained on the use of the new system.

- Review the operational procedures.
This was not completed and will be carried forward to 2019/20.

Websites

- Update the website as necessary.
- ✓ The website content was reviewed.

Food Standards

- Ongoing scrutiny of the database which is shared with the Food Safety Team to ensure the Authority is able to produce accurate data direct to the LAEMS database.
- ✓ Scrutiny of the database took place throughout the year.
- Review the Food Standards intervention data capture forms to ensure they are fit for purpose. They will be updated to take account of Welsh language and General Data Protection Regulation (GDPR) considerations.
- ✓ Food Standards intervention data capture forms were reviewed, amended, piloted and implemented.
- Review the Food Standards Quality Manual following implementation of the new Food Law Code of Practice (CoP) and any change in the Food law regulatory landscape.
Quality manual operational procedures were not reviewed as publication of the new CoP is still awaited. This will be undertaken when the new CoP is published.
- Devise and implement an operational procedure on Allergen enforcement protocol. This work was carried forward to 2019/20. It is one of the key issues being considered by a DPPW working group which includes contribution from the authorities Lead Food Standards officer.
- Continue with internal Food Standards Officer consistency training which will focus on risk rating, data capture, policies and procedures, significant breaches and the recording and disseminating of intelligence.
- ✓ No scheduled internal training event took place this year due to the sad loss of the Lead Food Standards Officer. However Food Standards Officers contributed to and piloted the updated Food Standards data capture form. Relevant policy. Procedural and database consistency issues were dealt with as they arose.
- Cascade relevant information, new guidance and emerging trends etc., to all relevant officers.
- ✓ Food Standards officers regularly receive relevant up to date information and guidance from a number of portals including e mail, websites, forums, strategic assessments and team meetings.
- Continue to develop and promote business support tools to aid compliance with the Food Information Regulation 1169/2011.
- ✓ Work continued on the development of two multi-language digital resources which will be completed in 2019/20.
- Implement any new guidance/legislation that is introduced.
Appropriate feedback is disseminated as necessary.

- Report food intelligence to aid in raising the profile of national food crime.
 - ✓ Intelligence reports are submitted as and when necessary.

- Update the website to comply with statutory changes as necessary.
 - ✓ The website content was reviewed and updated as necessary.

Appendix II

Food Safety Team Sampling Plan 2019 – 2020

	April	May	June	July	August	September	October	November	December	January	February	March
WFMF – Shopping Basket	Yellow	Yellow					Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Imported Foods	Purple	Purple	Purple	Purple	Purple	Purple	Purple	Purple	Purple	Purple	Purple	Purple
Approved Premise Food & Water Samples										Red	Red	Red
Ice Cream Survey	Green	Green	Green	Green	Green							
Ice from Coffee Shops						Blue						
Mobiles – foods, surface swabs & waters			Purple	Purple	Purple							

Shopping Basket – when other surveys are not running

Imported Foods – as and when identified

Approved Premise Water – 5 & Food Samples – 25 Food samples (5 from each) Peters, Brookes, Capital Cuisine, Billington Foods, Castle Dairies

Appendix III

**Food Standards
Projects/Surveys/Sampling Plan
2019 - 2020**

Source		April	May	June	July	August	Sept	October	Nov	Dec	January	Feb	March
Ed	Survey - Allergen Law digital Resource & Poster				X	X	X	X	X	X			
Ed	Re launch & publicise digital multi lingual Allergens media clip		X	X	X	X	X	X	X	X	X	X	X
Ed	Complete/launch multilingual digital media clip				X	X	X	X	X	X	X	X	X
Ed	Menu Descriptions Develop/launch multilingual digital media clip	X	X	X	X	X	X	X	X	X	X	X	
FSA/ Ed Liaison (Op Opson/replacement)	Participate in Operation Opson or replacement TBC										X	X	X
Ed	CCBC catering staff Allergen Awareness Training		X		X			X					
Intel	'Slimming' Meat Products				X	X					X		
Intel	Allergen Sampling										X	X	X
Intel	Initiative Sampling inc Vegan & Organic claims	X	X	X	X	X	X	X	X	X	X	X	X
Intel	Home Authority Sampling	X	X	X	X	X	X	X	X	X	X	X	X
CCBC	CCBC Procurement Sampling						X	X	X	X			

Joint working with Environmental Health, Catering and Procurement to ensure confidence in the food provided by the local authority will continue