



ENVIRONMENTAL HEALTH AND TRADING STANDARDS

FOOD SERVICE PLAN

2019/20

**Powys County Council
County Hall
Llandrindod Wells
Powys
LD1 5LG**

ENVIRONMENTAL HEALTH AND TRADING STANDARDS

FOOD SERVICE PLAN 2019/20

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EXECUTIVE SUMMARY

This Service Plan sets out the way in which food hygiene and food standards enforcement will be carried out in the County of Powys by the Environmental Health and Trading Standards services of the Authority in 2019/20. The Plan aims to ensure that national and local priorities and standards are addressed.

There are 2717 food premises in Powys, ranging from major manufacturing businesses to small corner shops. There are also an estimated 4515 premises that may be subject to food hygiene at primary production controls, ranging from large livestock and arable farms to small scale producers of fruit and vegetables.

The Service Plan is produced on an annual basis and is effective from 1st April 2019. The Plan is published widely and is available on the Authority's website. Copies are also available from each area office. Comments on the Plan are invited throughout the year, and these are taken into account when the following year's Plan is produced. The Plan is approved by the Authority prior to publication.

INTRODUCTION

The Food Standards Agency (FSA) Framework Agreement¹ gives guidance to local authorities on how their Food Service Plan should be structured and what it should contain. Service plans developed under these arrangements will provide the basis on which local authorities will be monitored and audited by the Food Standards Agency.

Service plans are seen to be an important part of the process to ensure national priorities and standards are addressed and delivered locally. Service plans will also:

- focus debate on key delivery issues;
- provide an essential link with financial planning;
- set objectives for the future, and identify major issues that cross service boundaries;
- take into account potential regional structures and changes to plans for the delivery of Trading Standards Services and
- provide a means of managing performance and making performance comparisons.

A Food Service Plan template is provided by the FSA to ensure that all the areas of the food enforcement service are included in the plan whilst allowing scope for the inclusion of any locally defined objectives. The template will ensure that local authorities will include in their service plans:

- information about the services they provide;
- the means by which they will provide those services, including the various requirements of the Standard;
- the means by which they will meet any relevant performance targets or performance standards;
- a review of performance in order to address any variance from meeting the requirements of the service plan.

¹ Framework Agreement www.food.gov.uk/enforcement/enforcework/frameagree/

1. SERVICE AIMS AND OBJECTIVES

1.1 AIMS AND OBJECTIVES

1.1.1 Aims

Local Authorities have a statutory duty to enforce food law as part of the UK's national "Official Controls" overseen and audited by the Food Standards Agency. Local Authorities must produce a plan setting out how they will deliver that function. This document discharges that duty for Powys County Council and has been written in accordance with The Food Standards Agency's Framework Agreement, which is based on statutory Codes of Practice. The service aims to ensure that food (including drink) intended for supply for human consumption that is produced, stored, distributed, handled or consumed in Powys is accurately labelled, compositionally satisfactory and without risk to the health or safety of the consumer.

1.1.2 Objectives

In producing this plan, Powys County Council has included a range of strategies, activities and interventions to discharge its statutory duties and to support the achievement of the Council's wider strategic objectives and relevant National Enforcement Priorities. We seek to balance a risk-based, proactive inspection programme (and, where necessary, proportionate enforcement action) with tailored advice and support for local businesses to help them comply. Trading Standards work to a National Intelligence model which makes decisions on priorities based upon threat and problems. We compliment this by providing information to the general public to enable them to make informed choices about the food they consume. To aid us in this we will:-

- Maintain an accurate and current record of all food premises.
- Conduct a co-ordinated sampling programme of food supplied or produced in Powys.
- Conduct a planned risk based inspection programme of local businesses.
- Deal with complaints about food in a consistent and co-ordinated manner.
- Provide timely and informative advice to local food businesses.
- Investigate and control outbreaks and food related infectious diseases.
- Respond to food safety incidents in relation to the food hazard warning system.
- Deliver the National Food Hygiene Rating Scheme.

1.2 LINKS TO CORPORATE OBJECTIVES / PLANS / REGIONAL PLANS

1.2.1 The Food Service Plan closely links to the key outcomes detailed in the Powys Corporate Improvement Plan: Vision 2025. These are:

- To develop a vibrant economy.
- To lead the way in providing effective, integrated Health and Care in a rural environment.
- To strengthen learning and skills.
- To support our residents and communities.

The Food Plan also closely aligns to wider regional and national plans set by the Welsh Heads of Trading Standards (WHOTS) and Welsh Heads of Environmental Health (WHOEHG).

1.3 LINKS TO FOOD STANDARDS AGENCY (Wales) PRIORITIES

1.3.1 Food

Following the problems relating to the presence of horsemeat in beef products the FSA have focussed this year's priority area as the speciation of meat and fish products. Other areas may emerge from the FSA `emerging risks` team.

2. BACKGROUND

2.1 PROFILE OF THE AUTHORITY

2.1.1 Population and area

Powys is a rural area covering a quarter of the land mass of Wales.

Population:	132,160
Area (hectares):	517,900

2.1.2 Administration

The Authority's headquarters is located in County Hall, Llandrindod Wells. Service delivery points are located around the County.

2.2 ORGANISATIONAL STRUCTURE

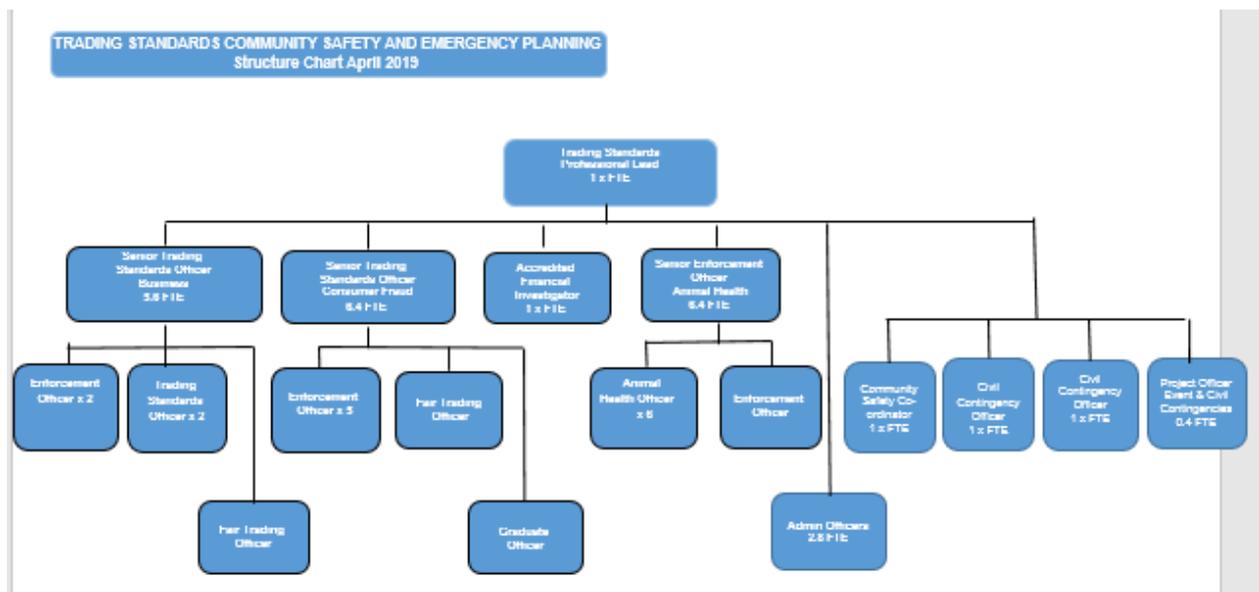
2.2.1 Environmental Health and Trading Standards is part of the Environment Directorate, reporting through Professional Lead Officers to the Head of Property Planning and Public Protection and to the Director of Economy and Environment.

2.2.2 Sections 11 and 13 of The Council's Constitution sets out the responsibility for functions and officers whilst The Leader's Scheme of Delegation of Executive Functions sets out the responsibilities of the eight Cabinet Members.

County Councillor James Evans is responsible for Food Official Controls exercised through the Director of Environment. Cllr Evans is the Portfolio Holder for Corporate Governance, Housing and Public Protection.

2.2.3 The Food Service is located within the Economy and Environment Directorate with food hygiene and infectious disease control delivered by the Environmental Health Commercial Food Team and food standards and food hygiene at primary production limited to feed hygiene interventions by the Trading Standards Business Team

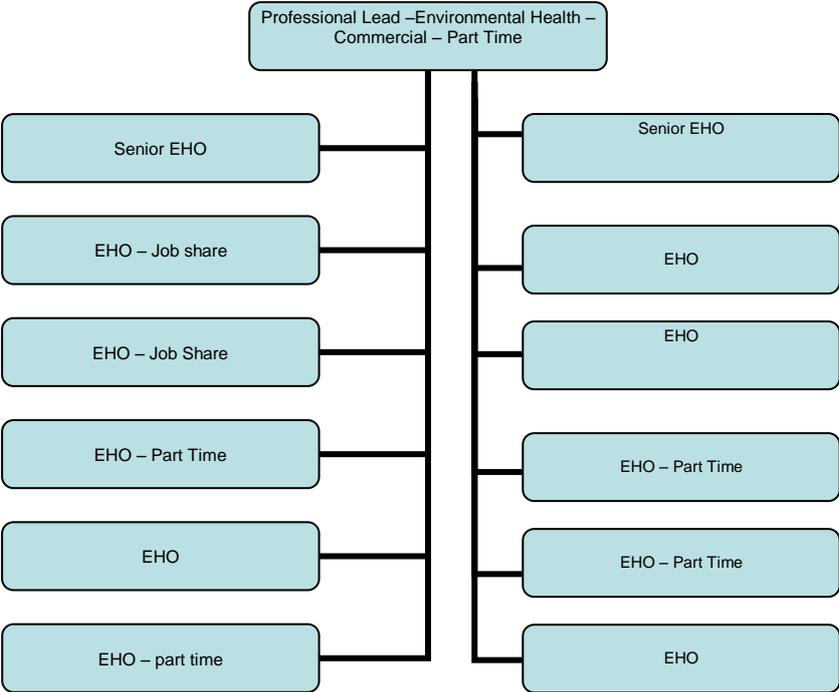
2.2.4 Trading Standards staff structure



Business Team: 1.6 FTE Enforcement Officers

Consumer Fraud: 3.8 FTE Enforcement Officers

2.2.5 Environmental Health staff structure



2.2.6 Analytical Arrangements

Due to the large geographical area of the County a selection of Analysts have been appointed as follows:

Public Analysts

<p>Mr J Robinson; Mrs S Brookes and Mr Alastair Low Minton, Treharne and Davies Ltd Unit 5, Llwyn-yr-Eos Cross Hands LLANELLI SA14 6RA</p>	<p>Michelle Evans, Emma Downie, Gary Burton, Jeremy Wootten and Duncan Arthur Eurofins Ltd. Consulting Chemists and Microbiologists, Woodthorne, Wergs Road, Wolverhampton, WV6 8TQ</p>
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Public Health Laboratory Service

Food Water & Environmental Services,
Public Health Wales,
Llandough Hospital,
Penlan Road,
Penarth
CF64 2XX

2.3 SCOPE OF THE FOOD SERVICE

2.3.1 Inspections and Joint Working Arrangements

The Environmental Health and Trading Standards services share their responsibilities for food enforcement in line with the Food Law Code of Practice and accompanying guidance². The managers of these two teams work closely together in order to facilitate cohesive, joint working between the two teams and outside bodies. When required, they will liaise with the Food Standards Agency and other regulatory bodies to co-ordinate any responses required.

2.3.2 Environmental Health

The Service holds responsibility for food hygiene inspections and complaints, microbiological food sampling, food safety promotional work, food poisoning investigations and management and handling of food hazard warnings. Other services delivered alongside the food hygiene service include some health and safety and very occasionally licensing inspections.

2.3.3 Trading Standards

The Service holds responsibility for food standards inspections and complaints, food hygiene at primary production premises limited to feed hygiene interventions, food sampling for compositional and labelling requirements and chemical contamination, and food standards promotional work. Other services for which Trading Standards are responsible include licensing and registration of fireworks/explosives/petroleum, animal health and welfare, fair trading, intellectual property crime, rogue traders, consumer fraud prices, descriptions, product safety, consumer credit and weights and measures.

2.3.4 Contractors

External contractors are occasionally employed by the Environmental Health Service to carry out some food hygiene inspections. Analytical and testing functions are carried out by external Public Analyst and testing laboratories.

² Food Law Code of Practice Wales & Food Law Practice Guidance Wales
www.food.gov.uk/enforcement/enforcework/foodlawcop/codepracticewales/

2.4 DEMANDS ON THE FOOD SERVICE

2.4.1 Premises Profile

The demands on the food service vary from year to year as premises open and close. Interventions are chosen and programmed at a frequency dependent upon the risk that they pose to food safety and food standards. A breakdown of the establishment profiles that are located within Powys, subject to food safety and/or food standards regulation is provided below.

Type of Premises	Number of Premises
Primary Producer	155
Manufacturer / Packer	71
Importer / Exporter	0
Distributer/Transporter	50
Retailers	442
Restaurants	1999
Total number of premises	2,717

There are 2717 food premises in Powys, of which 2377 are registered food premises.

2.4.2 Approved Premises

The breakdown above includes approved premises under product specific regulations of which there are currently the following number:

TYPE OF PREMISE	TOTAL
Minced Meat Products	2
Meat Products	5
Milk Products	0
Fishery products	0
Egg Products	25
Cold Stores	3

There are also a total of 4 water-bottling plants within the County which require specific application of legislation.

The Authority has a high turnover of businesses which results in a high turnover of catering staff with varying food safety/food standards knowledge and experience. Last year 2018/19, 273 new businesses were inspected and risk rated for Food Hygiene and 111 for Trading Standards.

2.4.3 Environmental Health (Food Hygiene) premises profile by risk rating

Category	Minimum Inspection Frequency	No. of premises
A	At least every 6 months	16
B	At least every 12 months	78
C	At least every 18 months	844
D	At least every 2 years	443
E	Alternative enforcement strategy	1,190

2.4.4 Trading Standards (Food Standards) premises profile by risk rating

RISK	Inspection Frequency	NO. OF PREMISES
A	At least every 12 months	20
B	At least every 2 years	896
C	At least every 5 years	680

2.4.5 Service Delivery Points

Service is delivered from a number of locations throughout the County as detailed below. Normal office hours are 8.30am - 4.45pm Monday to Thursday and 8.30am - 4.15pm Friday. The Authority operates a 24-hour 'Careline' – 0845 0544874 and a separate manned emergency service is operated out of normal office hours.

Trading Standards

The service has a delivery point in the following areas:

The Gwalia Ithon Road Llandrindod Wells Powys LD1 6AA 01597 826032	The Old College Newtown Powys SY16 1BE 01686 617524	Neuadd Brycheiniog Cambrian Way Brecon Powys LD3 7HR 01874 623420
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The Trading Standards Service was restructured in 2014, the functions in respect of food standards were transferred to the Business Team with work on illicit food products is to be supported by the Consumer Fraud Team, a further team in Trading Standards.

Environmental Health

The service has a delivery point in the following areas:-

The Gwalia Ithon Road Llandrindod Wells Powys LD1 6AA	Neuadd Maldwyn Severn Road Welshpool Powys SY21 7AS	Neuadd Brycheiniog Cambrian Way Brecon Powys LD3 7HR
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Service delivery points are also located throughout the County in the majority of outlying towns.

In addition to the hours indicated above, officers conduct unannounced visits and investigations at other hours than those listed above.

2.4.6 External factors which impact on the service including Food Fraud and other threat analysis

A seasonal activity that impacts considerably on the food service is the Royal Welsh Agricultural Show, which is held annually at Llanelwedd, near Builth Wells. As one of the largest agricultural shows in Europe with more than 200,000 visitors it demands a lot of proactive work prior to and a considerable amount of enforcement and reactive work during the week-long show. Routine work during this period is curtailed and officers' attentions centred on the event. The showground is also used during the year for many other special events.

Other major annual events impacting on routine work are the Brecon Jazz Festival, the Hay on Wye Literature Festival and other festivals throughout the year

Trading Standards work to an intelligence based model of delivering public services (Intelligence operating model) in line with national guidelines laid down by the National Trading Standards Board and under the Welsh Head of Trading Standards control strategy. Intelligence is received on matters such as illicit products(alcohol for example) supplied from numerous sources coming into the County including the threat of travelling criminality which provide a risk to Powys consumers and legitimate traders. Across all areas intelligence is shared through an IDB intelligence system maintained by Trading Standards and the FSA National Food Crime Unit system. Threats can also exist at markets, car boots, and fairs and the service adopts an intelligence based risk analysis approach to target reactive food related criminality which may pose a threat to Powys consumers and legitimate Powys traders at any time. We will also assess problem areas from previous years and use these, with emerging threats to constantly review our priorities and amend our plans accordingly. We call this process 'horizon scanning'. Problem areas identified feed future prioritising of work. An analysis of food intelligence for the period is provided in Appendix G. 2019/20 will include project work on allergens and takeaway restaurants.

Powys is a target for groups involved in the illegal slaughter and supply of meat. A substantial amount of officer time has been taken up investigating these activities. Officers are also actively involved in partnership work with the Police and the National Food Crime Unit in relation to these and other issues.

We are not able to quantify with certainty the number of businesses whose owners' first language is not English. We communicate effectively with most using friends or family members to translate where necessary and using "Safer Food Better Business" available in many different languages. Where necessary we use the translators from the Welsh Interpretation and Translation Services. It is estimated that less than 1% of all food premises have owners whose first language is not English.

We have no direct importers of food. However, we have several businesses, which supply imported foods and they are included in our programmed inspections

2.5 LINKS WITH POWYS COUNCIL PLANS/ ENFORCEMENT POLICY

2.5.1 The Powys County Council Mission is Change for Powys – Delivering an open, proactive and engaging Council for 2025.

The council's key priorities are:

- The Economy – We will develop a vibrant economy
- Health and Care- We will lead the way in effective, integrated rural health and care
- Learning and Skills – We will strengthen learning and skills
- Residents and Communities – We will support our residents and communities

2.5.2 To support these key priorities we will direct and enhance our services to support our local businesses and our local communities. We will provide the necessary guidance and support to assist businesses to start up and develop. We will encourage people to comply with the law in the interests of our wider communities. When this is undermined, and the Council has legal powers to protect our communities from harm, we will use them in a proportionate manner. The use of these legal powers is enforcement, and this ranges from serving notices requiring people to carry out certain actions, to prosecution which could result in fines, imprisonment, and being prohibited from carrying out certain activities. We will also include proportionate action under the Proceeds of Crime Act 2002 where needed to take the assets from criminals who have benefitted from food fraud.

2.5.3 The Enforcement Policy sets out the Council's approach to enforcement of its legal powers. It is intended to establish a uniform approach to enforcement throughout the Council, without placing too onerous a burden on local businesses, organisations, consumers, and the public. The policy has been developed with the Enforcement Concordat's principles of good enforcement as its foundation as well as the principles of the Regulators' Code. Trading Standards and Environmental Health enforcement officers receive ongoing training on RIPA, PACE and any other evidential enactments to support the enforcement competencies and development of officers. Detailed updates were received in 2018/19.

3. SERVICE DELIVERY

3.1 FOOD INSPECTIONS

- 3.1.1 Powys County Council will undertake food hygiene and food standards interventions as specified in the Food Law Code of Practice (Wales). The frequency of the inspections will depend upon the risk rating of the premises. The purpose of these interventions is to ensure that legal requirements are being met. Where they are not being met, appropriate enforcement action will be undertaken in accordance with the Authority's Enforcement Policy.
- 3.1.2 We aim to bid for any external funding that may become available throughout the year. The Food Standards Agency have, in previous years, invited local authorities to bid for grant funding to undertake targeted intervention activity in relation to food safety management systems and sampling. We intend to submit bids for such funding during 2019/20. This work will be carried out by existing members of the food safety and trading standards teams in addition to their existing workloads, with supportive backfilling of inspections by contractors.
- 3.1.3 Local Performance Indicator targets exist in relation to Food Hygiene and Trading Standards (including Food Standards) and are; The proportion of high risk inspections of food premises that are completed, target set at 100%. Percentage of new businesses identified during the year which are subject to an inspection, target set at 95% for Food Hygiene and 55% for Food Standards.
- 3.1.4 We will investigate instances of food fraud as they arise in conjunction with partner organisations. Food fraud is committed when food is deliberately placed on the market, for financial gain, with the intention of deceiving the consumer. The Authority takes the issue of food fraud very seriously and when it does occur has a responsibility to protect the consumer. Incidents where there are concerns about the actual or suspected threat to the safety or quality of food that could require intervention to protect consumers' interests will be investigated.
- 3.1.5 Our routine food hygiene and food standards inspections/interventions and complaint investigation work will take account of importers and other businesses handling imported food and imported food related issues. Steps will be taken to assess the legality of imported food from non-EU countries and effective action taken on non-compliance in order to protect public health. We will aim to identify businesses importing food into Powys, prioritising those imported from outside the EU. Risk based, systematic and proportionate checks on imported food will be carried out at a frequency that prioritises and reflects the risks presented by individual food businesses. We will pro-actively undertake food sampling at businesses that have been identified as either importing food directly or displaying for sale food which has been imported.

3.1.6 Trading Standards

Food Standards

The primary aim of food standards official controls, interventions and inspections is to ensure that the legal requirements are met covering:

- the quality, composition, labelling, presentation and advertising of food, and
- materials or articles in contact with food
- traceability, origin of food and claims concerning nutrition and health benefits.

3.1.7 All qualified food officers are appropriately trained and competent to fulfil their duties in accordance with the requirements of the Food Law Code of Practice and possess the appropriate expertise to enable competent inspection of any specialised processes with the Authority.

3.1.8 Annual targets on food work are set for officers to carry out inspections to A (high), B (medium) and C (low) risk premises and other food work. These are agreed and reviewed at regular Appraisals and 'one to ones' and Business Team meetings. An Activity Matrix is documented in the 'Shared Area' on in service computer systems and this provides continuous monitoring of the current position in respect of food standards interventions with overall targets being placed in the Trading Standards Operational Plan ~~Service Delivery Plan~~³ for the forthcoming year. This Plan is approved by the Director and then by Members of the Authority. Defining an intelligence based model to food work means that we reduce the level of inspections and reactively respond to priority work.

The number of food standards inspections due for 2019/20 is as follows:-

Risk Category	A	B	C	Total
No. of inspections due	20	390 (506)	267 (413)	677 (919)*
Targeted no. of inspections to be conducted	20	320	60	400

**The figures in brackets are the numbers of overdue interventions.*

Priorities are also determined from problems identified under the previous number of years in Powys and beyond and therefore all work should be intelligence based and appropriate.

In 2018/19 the following outcomes come out of food work which have had an input on prioritising 2019/20 work.

- 46% of food samples failed on composition which fed into priority work and added increased pressures with the need to investigate and action all matter
- 26 food investigations were conducted

³ available from www.powys.gov.uk/tradingstandards

- 35 intelligence logs actioned and investigated
- 91 written warnings and one simple caution issued
- Three Food Incidents were reported to the FSA Incidents Team resulting from work conducted in 2018/19.

The following inspection programme will be achieved

- 100% of the target for A rated (yearly inspection) premises -20 in number
- 83% of the target for B rated (every 2 years) premises target-320 in number
- 22% of the C rated(every 5 years) premises target-60 in number

There is recognition that for B and C rated premises the targets figures sit outside the requirements of the Code but the recommendation and decision to undertake this is based upon the following rational to use the resources available which are unlikely to be increased:

- Trading Standards have moved to an intelligence based system to manage food matters and this work reflects increased focus on investigations on food matters, increased intelligence production, and directed project work on matters of immediate threat such as allergens work

Intelligence in relation to these premises will be reviewed to ensure that they have been correctly risk rated and visited where possible and appropriate.

The following further activity will also take place to support the programme

- 506 'outstanding' B rated premises will be the subject of some form of intervention and a plan will be devised for this including some review of intelligence on each premises.
- 50 intelligence logs on food matters will be produced.

The new business process will identify additional B rated premises; this is due to the nature of the activities being undertaken. This figure is not included in the above table; 302 new food businesses were identified in 2019/20; the majority of these being B rated.

3.1.9 Revisits

It is estimated that around 90 revisits will be carried out to food premises in 2019/20, based upon a figure of 77 revisits carried out in 2018/19.

3.1.10 Food Hygiene at primary production

The Food Standards Agency has hypothecated funding for the delivery of Feed Hygiene in 2015/16 to a predetermined programme; the delivery of food hygiene at primary production has been incorporated into the visit but is not currently funded under this programme and is retained within the Revenue Support Grant.

3.1.11 Environmental Health

The primary aim of all food safety interventions shall be to:-

- Identify potential hazards and assess their risks to public health arising from activities within the food business;
- Assess the effectiveness of management control to achieve safe food;
- Identify specific contraventions of food hygiene law.

3.1.12 The service will ensure that interventions are carried out in accordance with the Food Safety Act Code of Practice. The Inspection Rating System will be used to determine the frequency of programmed interventions within a range of 6 months to 3 years. Programmed inspections alone shall be used for the purpose of determining the frequency of further programmed interventions.

The probable numbers of premises to be targeted for inspection/intervention for 2018/19 are as follows:-

Risk Category	A	B	C	D	E	Total
No. due in 2019/20	32	78	507	221	116	954
No. overdue from 18/19	0	0	0	0	113	113

The number of food hygiene inspections/interventions to be carried out by the food hygiene service in total during 2019/20 is therefore 1067.

3.1.13 Premises rated as Category E are not required to be subject to primary inspection but must be subject to an alternative enforcement strategy not less than once in any 3 year period. We intend to continue to maintain regular contact with this category of business through newsletters and information sharing via email, Twitter feeds etc. A proportion will also be verified via spot checks. Other triggers for inspections of such premises would be consumer complaints, new proprietors identified via planning/licensing, or where other inspectors trigger an inspection (such as Health and Safety or Licensing Officers). Other intelligence-based projects may also be adopted during the year based on sampling results or new regulations or guidance. We will target those remaining due an intervention with a questionnaire to verify that there have been no significant changes within the business.

Last year we carried forward a surplus of 401 premises and had a much larger figure due an intervention and whilst we are still carrying over a surplus this has been much reduced and a significant improvement has been noted.

3.1.14 In addition to the programme of inspections it is anticipated that approximately 385 revisits will be required in 2018/19 based on figures of 336 in 2018/19 and 437 in 2017/18. Furthermore last year 273 new businesses started up so it is estimated that this year a similar number will be requiring start up visits.

- 3.1.15 To ensure adequate expertise is available to enable competent inspections of specialised processes, officers are generally given a specialism in a product specific field, e.g. milk products, meat products, etc. and concentrate on the development of consistent and thorough inspections in these specific fields of food safety. These officers are then identified for appropriate training available in these fields.
- 3.1.16 Furthermore should a situation arise where expertise was not available in-house this would either be achieved by the necessary training or by identifying and bringing in the necessary expertise.
- 3.1.17 Officers will carry out inspections of those businesses open outside office hours as required.

3.2 FOOD COMPLAINTS

3.2.1 Trading Standards

The service is responsible for dealing with complaints about the labelling and composition of food. Complaints are dealt with in accordance with documented procedures which require a response within two working days of receipt.

COMPLAINTS RECEIVED	
Food Standards	
2015/16	27
2016/17	87(TSA,TSB &TST)
2017/18	78
2018/19	46
2019/20 (estimate)	50

It is estimated that **3** food complaint samples will be submitted for analysis in 2019/20. This will require the following resources: Intelligence will flow from these complaints.

- Food complaints (3 samples analysed):

Analyst fees (3 x £100) = £300
Officer time (6 days) + expenses = £1800
Total = £2100

3.2.2 Environmental Health

The service is responsible for investigating complaints of contamination of food by micro-organisms or toxins and the contamination of food by mould or foreign matter. Chemical contamination of the food will be investigated if the food poses an imminent risk to health.

Food complaints are dealt with in accordance with departmental procedure and Codes of Practice and guidance.

The number of food complaints received is as follows:

Year	No. of food complaints
2015/16	46
2016/17	40
2017/18	50
2018/19	43

Resources required to deal with food complaints can vary dramatically from the straightforward to the more complex requiring significant research and analytical fees. We can anticipate in the region of 45 food complaints during the course of the year.

3.3 PRIMARY/HOME AUTHORITY PRINCIPLE

3.3.1 Powys County Council has adopted the Home Authority principle and remains committed to providing that service if required. The Authority currently acts as Home Authority for 12 food businesses in the area. Each of these businesses is classified as a high priority and receives at least one visit per year and has a named officer responsible for that business. These arrangements are being reviewed in the forthcoming period. Powys County Council recognises the legal status of the Regulatory Enforcement Sanctions Act 2008 and businesses operating under Primary Authority arrangements developed by the Better Regulation Delivery Office (BDRO) now called Department for Business, Energy and Industrial Strategy (BEIS) since July 2016. Regulatory and enforcement action is undertaken in a manner which is consistent with this. The Authority will consider participation in the Primary Authority Scheme if approached by a business and is currently actively working with a number of businesses on developing agreements for food hygiene.

These are informal arrangements and are currently under review and we are looking to formalising the Home Authority process and advising local businesses of the option of Primary authority for the future and involvement in trader approval schemes.

3.4 ADVICE TO BUSINESSES

3.4.1 Scope of Advice Service

The Authority recognises the importance of responding positively to all requests for advice or guidance from food businesses. Providing advice and guidance will promote compliance, reduces the need for formal enforcement action and will help build a positive working relationship between the enforcement officers and businesses. Advice to existing and new business is provided in the following ways:-

- In the course of routine inspections
- In response to a complaint
- In response to a service request from the business
- In response to information passed on by another local authority or agency.
- In the course of a Primary Authority/Home Authority liaison
- Signposting via the Internet
- At trade seminars e.g. promoting the Food Hygiene Rating Scheme at Licensing forums, promoting Food Information Regulations (particularly allergens) to local businesses

Advice may be provided following a specific request, or may be given proactively to update businesses on changes in legislation. A range of nationally produced guidance leaflets is available from each of the website. We are developing new approaches to provide business advice which are the most economically viable for Powys traders and the council including increase use of the corporate website.

The Environmental Health Service has adopted a charging service for more extensive food hygiene advice provided beyond that required by statute.

3.4.2 Contacts from Business

The Food Service Teams give advice to businesses (especially new businesses). New entrants into the food business are unknown quantities. In Powys many have proved to be inexperienced, untrained and under-funded. New businesses therefore pose a potentially high risk, which needs to be addressed. We believe that early advice (ideally at the planning and design stage) helps Food Business Operators appreciate the systems and investment that are needed to run a food business safely and to ensure that their financial outlay is planned, minimised and wisely targeted. This drives up structural standards and provides an opportunity for early engagement with the FBOs to establish good food safety management systems. This supports local business at their most vulnerable stage and increases their chances of survival and prosperity. A reduced turnover rate of food business also brings dividends to the enforcing authority. It drives up the rate of “broadly compliant” premises and builds competence and stability in the food business workforce. It reduces the need for us to start from scratch with new entrants to the business and hence saves officer time and reduces the need for enforcement intervention.

Whilst we would ideally like to inspect all new premises within 28 days of them opening, in accordance with the Code of Practice, this is not always practicable due to other demands on our service. We have therefore set a target to inspect 95% for food hygiene and 55% for food standards. In 2018/19 we were able to complete 100% food safety inspections and 52.3% food standards of new businesses. Food hygiene inspected 273 out of 273 and for food standards 158 out of 302 (LAEMS) were inspected and given appropriate advice.

An estimated total of 20 advisory visits by Environmental Health will be carried out during 2018/19, based on previous year's figures of 211 in 2013/14, 186 in 2014/15, 101 in 2015/16, 32 in 2016/17, 17 in 2018/19 and 23 in 2017/18. These are in addition to the many advice requests that get responded to by email or telephone. The number of advisory visits has dropped considerably following the introduction of a chargeable advisory service whereby visits are chargeable but basic contact for advice remains free.

An estimated total of 50 requests for advice on food issues will be received by Trading Standards in 2019/20 based upon the figure of 39 (includes codes TSA, TSB, TSC and TST) for 2018/19.

3.5 FOOD SAMPLING

3.5.1 Trading Standards

Food Standards sampling is undertaken to protect public health, detect and deter fraudulent activities, verify that official controls are effective, give customer's sufficient information to make informed choices, ensure that food standards are maintained, inform the enforcement approach, provide product quality advice to the producer, promote fair trade and deter bad practice. The Sampling Programme, is formulated with the council's Public Analyst to address issues that may have arisen locally and will be informed by guidance, liaison groups, intelligence, topical issues and public demands. (See Appendix E). Where

breaches are found which have a national or regional input then intelligence logs are produced on such breaches.

Participation in national and regional sampling surveys is included wherever possible. A contingency is made for complaint samples, which are dealt with as and when received. Monitoring of the sampling programme is continuous, with the sampling information being recorded in the Business Team Sampling Matrix, including results and actions. A service level agreement with the Public Analyst is in place that covers the storage and transportation of samples, reporting times and payments.

The Service will bid for additional food samples where the opportunity arises through the Food Standards Agency.

Samples	
Food Standards	
2015/16	114
2016/17	109
2017/18	82
2018/19	67
2019/20	64

In addition product screening takes place in the course of the routine inspection programme at licensed premises to check the specific gravity of spirits using a hydrometer. Screening also takes place using commercially developed indicators to ensure that non-branded lower quality brands of spirits have not been substituted and passed off as market leading brands.

3.5.2 Environmental Health

The service participates in and is represented on the Welsh Food Microbiological Forum. Samples are obtained as part of the Welsh Food Microbiological Forum and initiatives and further targeting of local producers not included within these initiatives is also carried out to monitor the quality of locally produced foods. In addition to these locally driven sampling programmes the Authority also participates in national microbiological food surveys. It is anticipated that a total of approximately 300 food samples will be taken during the year 2019/20 based on previous year figures of 275 in 2016/17, 302 in 2017/18 and 275 in 2018/19. All such samples are submitted via the NPHS/HPA as detailed earlier in the plan for analysis. The sampling plan for 2019/20 is attached as Appendix F to this document.

3.6 CONTROL AND INVESTIGATION OF OUTBREAKS AND FOOD RELATED INFECTIOUS DISEASE

The Council works with Public Health Wales/ England in managing cases and outbreaks of food related infectious diseases. The Management and organisational arrangements for dealing with outbreaks of infectious disease are contained in 'The Communicable Disease Outbreak Plan for Wales', an All Wales model, agreed by the NPHS and Local Authority, and subject to annual review.

All cases are contacted, the necessary details collected, and advice given on precautionary measures to prevent the spread. Where necessary, exclusions are placed on persons considered to be within a high risk category to ensure control of the organism in accordance with the Powys Plan.

It is anticipated that approximately 300 cases of infectious diseases are likely in 2019/20 based on statistics from previous years of 269 in 2016/17, 243 in 2017/18 and 314 in 2018/19. The Authority is committed to the 'lead officer' concept introduced across Wales through which each Authority has a nominated officer undertaking more detailed training in communicable disease control. These officers not only provide a well-informed resource for their own Authority but could be called upon should a serious incident arise in another Authority to assist in the investigation and control.

The number of bovine tuberculosis reactor herds has substantially increased in recent times, and this has involved considerable officer time in investigations on the farms concerned to ensure no risk exists with milk production and consumption.

3.7 FOOD SAFETY INCIDENTS

- 3.7.1 The Authority recognises its obligations under section 40 of the Food Safety Act 1990 and the Code of Practice in relation to the food alerts and incidents system. Where the Authority identifies that food fails to comply with food safety requirements they will inform all other potentially interested Authorities. The Authority will assess the scale, extent and severity of the hazard. In the event of it being a serious incident or a wider problem then they will liaise/notify the appropriate Central Government Department and formulate a food incident report that will be forwarded immediately to the relevant Government Department.
- 3.7.2. Both the food safety team and the trading standards teams have policies and procedures in place that deal with the action to be taken following the receipt of initiation of a food alert. The Food Standards Agency has the contact details for the Authority, including outside of normal working hours. The warning procedure for food incidents recognises that Food Alerts for Action (FAFA) are required to be dealt with quickly and are treated as a very high priority which often takes priority over other work of the sections. During 2016/17 the Food Standards Agency started issuing such information through the Regulatory Information and Management System (RIAMS) electronic system which operates in a similar manner. Powys County Council has appointed Authorised Officers who are available for out of hours contact. Several officers also receive Food Alerts via mobile SMS.
- 3.7.3 All food and feed safety incidents will be responded to in a reasoned, measured and co-ordinated manner. Any response will comply with the Food or Feed Law Codes of Practice.
- 3.7.4 The number and scale of incidents and the risk associated with them cannot be predicted. Nor is it possible to provide a dedicated staff resource on standby to deal with any incidents that may arise. However, we have never failed to deal appropriately with any incident that has been reported. We have good working relationships with other organisations involved with providing emergency responses and we have tried and tested systems in place to facilitate a

coordinated response. We are confident that, by deploying appropriately skilled staff from our establishment and working with partners, we shall continue to be able to provide a robust response on demand.

- 3.7.5 Allegations of food fraud are taken seriously and the Authority will undertake investigations as necessary. Any food intelligence received is reported to the Regional Intelligence Analyst who will inform the Food Fraud Co-ordination Unit.

3.8 LIAISON WITH OTHER ORGANISATIONS

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

- 3.8.2 Where our activities involve law enforcement it is important that we act consistently and proportionately. Our Enforcement Policy ensures that we follow due legal process and our involvement with professional networks facilitates technical debate leading to sharing of best practice and consistency between Local Authorities in Wales. These groups are also attended where appropriate by representatives from other bodies with coordinating roles such as the Food Standards Agency, National Food Crime Unit, Public Health Wales, Communicable Disease Surveillance Centre (Wales), Public Analyst, the Welsh Local Government Association, Welsh Government, Local Government Regulation, Chartered Institute of Environmental Health, Trading Standards Institute and the Regulatory Delivery Office.

- 3.8.3 We currently attend the following liaison groups:

- Directors of Public Protection Wales
- Wales Heads of Trading Standards
- Wales Heads of Environmental Health
- South West Wales Food Safety Task Group
- Wales Food Safety Expert Panel
- South West Wales Communicable Disease Task Group
- Communicable Disease Expert Panel
- Wales Food Microbiological Forum
- Wales Heads of Trading Standards Food Standards and Labelling Group
- Wales Heads of Trading Standards Regional Feed Group
- Mid and West Wales Food and Feed Group
- National Agriculture Panel
- Wales Heads of Trading Standards Animal Health and Welfare Panel
- Cross Compliance Co-ordinating Board
- Government Agency Intelligence Network (GAIN)

- 3.8.4 Environmental Health and Trading Standards are Responsible Authorities under the Licensing Act 2003 and Environmental Health are consultees to the Council's Development Control Committee. Formal consultation networks are established within the Authority in respect of both planning and building control and licence applications including Street Trading and Temporary Event Notices. Liaison also occurs with business through a planned inspection programme.

- 3.8.5 These functions can be time consuming but the benefits justify the activity. With our existing staff resource it has been possible to engage appropriately.

3.8.6 Trading Standards

Powys County Council is in the Mid and West Wales Region, with Carmarthenshire, Ceredigion and Pembrokeshire and regional co-ordination of food sampling in respect of specification from wholesale meat manufacturers was undertaken in 2018/19. Regional targets and bids for additional work for the year 2019/20 have not been made as yet but will be in place by 31 August 2019. The sampling work associated with Opson, an international food protection operation is not known until later in the year but provision of resources has been allocated to engage with this; in 2018/19 the area for investigation was organic claims.

A liaison meeting is held at least twice a year with Public Analysts, the other Mid and West Wales Authorities and other stakeholders. The meeting provides a forum to discuss current enforcement issues and co-ordinated sampling programmes.

3.8.7 Environmental Health

To ensure enforcement action taken in the County is consistent with neighbouring Authorities a representative attends the SW Wales Regional Food Safety Group and the SW Wales Regional Communicable Disease Group. These are sub-groups of the Directors of Public Protection Wales (DPPW).

Attendance is also present on the following groups leading to further consistency in approach:

- All Wales Food Safety Expert Group
- All Wales Communicable Disease Expert Group
- Welsh Food Microbiological Forum.

Regular liaison is undertaken with the National Public Health Service in relation to the investigation and control of food poisoning incidents, and with DEFRA in relation to zoonoses issues.

Powys County Council are also responsible for setting up and facilitating an All Wales and cross border consistency event, held on an Annual basis. It has been nationally recognised as a useful tool to aid consistency in the Food Hygiene Rating Scheme and interest has been shown in this event by other nations.

3.9 FOOD SAFETY AND STANDARDS PROMOTION

3.9.1 The service will participate in National Food Safety Week. This annual event, helps to promote the importance of good food

This will be promoted across the County through various initiatives.

Various other promotional events will be supported locally too.

3.9.2 The service participates in the Food Hygiene Rating Scheme, which helps consumers choose where to eat out or shop for food by giving them information about the hygiene standards in restaurants, cafés, takeaways, hotels and food shops. The schemes also encourage businesses to improve hygiene standards. 2325 premises across Powys currently have ratings. The overarching aim is to reduce the incidence of food borne illness. Promotional work will continue to be carried out to promote the scheme.

Additional work required as a result of the rating scheme has involved in 2018/19 83 requests for re-ratings, 6 appeals against ratings and 707 monitoring checks for non-display. A number of fixed penalty notices (12) have been issued to premises across County but none have been prosecuted for non-display in the past year.

- 3.9.3 The Environmental Health Service in Powys routinely works with food business operators to highlight the importance of and assist with the implementation of suitable food safety management systems. The Safer Food Better Business (SFBB) food safety management system has been recommended during programmed inspections since the pack was launched.
- 3.9.4 The Environmental Health Service has used previous funding provided by the Food Standards Agency to run a number of Safer Food Better Business training events for food business operators and to undertake individual coaching sessions with a CMI consultant to assist further with the introduction of a system. The service was successful in its bid to the FSA for additional funding to enable the service to set up an email database for their businesses through which regular communications can be channelled along with Twitter feeds. Providing a more efficient and economical means of communication with the food business operators.
- 3.9.5 Business advice to micro businesses may be initially provided by signposting to websites such as the Business Companion. Offering a bilingual business advice service will continue to support and promote the growth of the local economy. Specific business sector advice is also provided through the Chartered Trading Standards Institute's Business Companion - a web based information service.
- 3.9.6 The Trading Standards Service in Powys routinely works with food business operators in respect of the requirements of European and United Kingdom/Wales legislation specifically for food standards. Trading Standards actively engages with businesses, to promote the requirements in respect of allergens and to highlight the importance of conveying potentially life-saving information to consumers. Trading Standards advises businesses on the implementation of suitable allergy safety and food standards management systems.
- 3.9.7 The Service publicises food issues to inform businesses and the public, using a variety of techniques including:-
- Press releases about current issues
 - Postings on council website
 - Powys Staff Newsletter
 - Business seminars
 - Talks to interest groups i.e. to schools, Women's Institute, Pensioners Clubs, Probus / Business Groups (where resources permit)
 - Attendance at agricultural shows e.g. Royal Welsh Show, Winter Fair
 - Social media through Facebook and Twitter pages
 - Attend Business tea events (where resources permit).

- 3.9.8 In addition to food standards work required by the Food Law Code of Practice the Trading Standards team operate the Intelligence Operating Model. IOM uses an annual control strategy and tasking process to use and share intelligence with relevant enforcement agencies. This intelligence is used to inform evidence-based intervention and targeted enforcement where applicable. Such intelligence can be used to carry out a programme of enforcement activities to target significant illegal activities and take criminal monies away from illegal activities related to food fraud. This year we have used the MoRiLE assessment method as part of our Strategic Assessment to help us determine our initial Service priority areas for 2018/19. Risk prioritisation models, such as MoRiLE, enable a consistent approach to balancing demand with capability and capacity by assessing risk on a number of factors. A “**Threat Assessment Score**” for each Service functional area is calculated, determining anticipated impact and harm (on individuals, communities, the environment, and geographic scope) and likelihood (credibility, scale and vulnerability) of the threats. The functional areas are then ranked in order of priority on the basis of the score, with the appropriate level of activity set for each one.
- 3.9.9 It is not cost effective to evaluate the benefits of food standards promotional work; some feedback will be obtained from business/consumer satisfaction surveys. Promotional work is undertaken as an integral part of the duties of staff engaged in food law enforcement and the adoption of preventative measures to improve business compliance has a positive impact on the development of the local economy.

4. RESOURCES

4.1 FINANCIAL ALLOCATION

4.1.1 Details of the budgets allocated for 2019/20 can be found in the Appendices.

4.2 STAFFING ALLOCATION

4.2.1 Trading Standards

Number of FTE involved in Food:	3.0
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	Qualifications				
	DTS (or equiv)	DCA (inc Paper IV)	DCATS	Lead Auditor	HACCP
Qualified Officers (Actively engaged in food enforcement)					
Clive Jones*	✓			✓	
Jacqui Thomas	✓			✓	✓
Jo Davies	✓				✓
Kelly Edwards	✓			✓	✓
Suzanne Jerman		✓			✓
Joy Williams		✓			✓
Qualified Officers (Not actively engaged in food enforcement)					
Nikki Davies	✓			✓	
Gavin Jones		✓			
Lisa Woods		✓			
Nicola Croose			✓		
Steven Parry			✓		

* Professional Lead Trading Standards – managerial involvement in food enforcement activities.

4.2.2 Environmental Health

Number of FTE involved in Food Hygiene:	9.11*
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*estimated

Officer	Qualifications
Beverley Cadwallader	EHO/EHORB Registered
Carol Goldsmith	EHO/EHORB Registered
Myfanwy Mapp	EHO/EHORB Registered
Janet Evans	EHO/EHORB Registered
Rosemary Wilcox	EHO/EHORB Registered
Elin Roberts	EHO/EHORB Registered
Catherine Davies	EHO/EHORB Registered
John Paul Lawrence	EHO EHORB Registered
Jane Jones	EHO EHORB Registered
Sam Lauder	EHO/EHORB Registered
Lorna Morris	EHO/EHORB Registered
Rhian Jenkins	EHO/EHORB Registered
Donna Mabbutt	EHO/EHORB Registered
Debbie Halstead	EHO/EHORB Registered
Judith Loyns	EHO/EHORB Registered

In addition to these professional qualifications all officers are trained in HACCP and the auditing of HACCP and a number of officers have the lead auditor qualification.

With regards to the analysis of the resource available against the resource required to deliver the service in full, this has been undertaken in formulating this year's plan and where we have identified a shortfall in the Category E alternative enforcement programme for food hygiene resources have been provided to assist with the full time equivalent time officers spend on health and safety reducing to accommodate the additional workload. Therefore the workloads identified and anticipated to comply with our obligations are all within budget. Whilst we accommodate for a certain amount of unplanned outage per officer in our calculations the plan of course is dependent on no significant issues arising which take officers away from their routine work.

4.3 STAFF DEVELOPMENT PLAN

4.3.1 All staff are encouraged and supported in the attainment of formal qualifications. Staff currently active in food law enforcement, complete a competency training programme annually, in accordance with the Food Law Code of Practice and Practice Guidance.

4.3.2 Ongoing training requirements are identified in both Trading Standards and Environmental Health's, Appraisals and 'one to ones' and Team Meetings. Staff apply to attend training events in order to consolidate or update their knowledge. Whenever practicable, they feedback to their peers at office or other staff meetings on their new found knowledge. Additional internal training courses are also arranged where appropriate to ensure that officers attain the 20 hours continuous professional development stipulated in the Food Law Code of Practice (para. 4.2.7).

4.3.3 Training identified at present for 2019/20:-

Officer(s)	Course/training	Organised By	Cost
Trading Standards enforcement staff	FSA Funded Training and online training	FSA	Nil
Trading Standards enforcement staff	On line training.	ABC Training	£3,900
Trading Standards enforcement staff	Consistency training	In-house	Nil
All enforcement staff	PACE / RIPA/ Prosecution manual	In house	TBC
Environmental Health food safety staff	Consistency training	In-house/FSA	Nil
Environmental Health food safety staff	Training in specialist fields of food hygiene such as dairy production, water bottling	FSA	Nil

5. QUALITY ASSESSMENT

5.1 MONITORING ARRANGEMENTS

The Authority supports the system of local authority audits organised by DPPW in Wales. The Food Standards Agency have carried out a number of audits of the Authority and copies of reports are published on the Food Standards Agency website.

5.1.1 Trading Standards

Monitoring of progress towards targets occurs at Business Team Meetings/ Appraisals/ 'one to ones' and the Trading Standards Management Team meetings; where a review of Key Management Statistics are undertaken.

In order to ensure uniformity in standards of intervention, consistency training is undertaken on a regular basis; a system of monitoring is in place, which includes the following:-

- The standing agenda item of "Consistency" at meetings of the Business Team to ensure consistency of approach in the completion of the Food Standards Intervention forms produced by the WHOTS Food Standards and Labelling Group.
- Internal audits by the Senior Trading Standards Officer of a random sample by officer, of completed food standards intervention documentation to assess data collection and standards.
- "Shadowing" of a random sample by officer, of interventions carried out each year. The inspecting officer will be accompanied by the Senior Trading Standards Officer in order to evaluate consistency in respect of procedures and standards.

5.1.2 Environmental Health

The service is also committed to improving its services' and following best practice standards wherever possible.

In order to ensure uniformity of standards consistency training exercises are carried out at least annually and a system of monitoring is in place, which includes the following:

- regular meetings of the team to ensure consistency of approach throughout the County.
- in-house audits of a random sample of files, inspection documents etc.
- a random number of inspections carried out each year when the inspecting officer will be accompanied by another experienced officer in order to evaluate procedures and standards.
- The service has been pro-active in bringing together all Welsh and All English neighbouring Local Authorities to discuss consistency issues through a training event instigated and run by Powys County Council.

6. REVIEW

6.1 REVIEW AGAINST THE SERVICE PLAN

6.1.1 Trading Standards and Environmental Health

The plan is used as a means of reviewing performance and any variance in meeting the previous years plan is addressed within the current years plan. Performance is also measured via quarterly monitoring of key performance indicators and these are reported on and tracked throughout the year. Areas of variation from set targets are identified and reasons explored for such variations. An improvement plan is produced if necessary.

Annual returns to the FSA under the monitoring arrangements are scrutinised by the lead officers prior to being submitted.

6.1.2 Each year an Environmental Health and Trading Standards Framework Service Delivery Plan is also produced. This plan links the work of the Food Service Teams to the various corporate plans and business plans. It specifically indicates the surveys planned, along with how the service will be delivered to meet national and local priorities.

6.1.3 The headline actions for the Food Service in 2018/19 were:

- To maintain the percentage of food establishments which are broadly compliant with food law.
- Carry out a proactive; risk-based programme of inspection of A, B, C & D rated food premises in accordance with the Code of Practice.
- Continue programme of alternative enforcement in E rated food premises.
- Participate in the National Food Hygiene Ratings Scheme, which is now mandatory, to provide informed consumer choice and drive up food safety standards in food businesses
- Respond to notifiable infectious diseases as reported.
- Continue to monitor the safety standards of food and feed products manufactured, imported and supplied within the Authority, with particular emphasis on food fraud, chemical contamination, allergens, GM and pesticides
- Working with the businesses to promote awareness within the catering sectors of allergen and nutritional information.

6.1.4 The Food Service will monitor the following performance indicators during 2019/20:

- PPN/001 – The percentage of high risk businesses that were liable to a programmed inspection that were inspected, for food hygiene; Trading Standards (including Food Standards);
- PPN001ii/ PPN001iii (was PPN/008) –Food Hygiene; Trading Standards & Animal Health – Percentage of high risk businesses that were liable to a programmed inspection.
- PPN008i/PPN008ii (was PPN/005) – The percentage of new businesses identified during the year which were subject to an inspection by Trading Standards; Food Hygiene;

- 6.1.5 The Authority achieved 100% for Food Hygiene and 98.11% for Trading Standards (this figure includes Food Standards/Feed Hygiene/Animal Health and Petroleum) a 100% of Food Standards was actually achieved for PPN/001. The percentage of Broadly Compliant Food Businesses for 2018/19 is 95.55%.
- 6.1.6 The percentage of new businesses identified during the year which were subject to an inspection, PPN/008 (was PPN005):-

Year	Trading Standards %	Food Hygiene %
2015/16	47.68	99.12
2016/17	50.95	94.56
2017/18	55.74	100
2018/19	36.16*	100

*This figure includes Animal Health new businesses. Food Standards figure is 52.3%.

6.2 VARIATION FROM THE PREVIOUS YEAR'S SERVICE PLAN

6.2.1 Environmental Health

The Environmental Health service has achieved well against food hygiene inspection targets this year. 100% of the high risk food premises targeted for inspection have been achieved.

The service have achieved particularly well against the target in relation to making contact with new businesses as regeneration is recognised as a key issue and this first contact is seen as a key step in business set up.

Finally whilst we still are carrying forward a backlog of Category E premises which are due an intervention, this number is much reduced and shows an improving picture.

6.2.2 Trading Standards

The Trading Standards service has achieved some of its key targets for 2018/19 in respect of official controls, interventions and inspections.

Activity	2017/18 Projected	2017/18 Achieved	2018/19 Projected	2018/19 Achieved	2019/20 Projected
A Rated Inspections	44	44	20	20	20
B Rated Inspections	100	240	80	192	320
C Rated Inspections	40	40	20	42	60
Revisits	60	87	90	77	80
Food Complaints	70	78	80	46	50
Complaint Samples	3	1	3	0	3
Requests for Advice	80	58	60	39	50
Food Samples	100	97	90	67	64
New Businesses	112 (55%)	101 (32.4%)	225 (55%)	158 (52.3%)	200 (Estimate)
Total Interventions	609	746	662	626	847
Intel Logs	-	-	50	35	50

- Our activity in 2018/19 produced some positive outcomes, all 'A' rated food standards premises were visited and there was a 240% over achievement in B rated premises. This was due to the continuing work in respect of the 'Powys Take-away survey', This work had a significant impact on resources available for other food inspections and interventions.
- Our performance was fed back quarterly to the Portfolio Holder and a meeting arranged to review performance.

6.3 AREAS FOR IMPROVEMENT

- 6.3.1 The Food Service has been audited by the Food Standards Agency and on these occasions has responded positively to the areas for improvement identified. Areas of improvement for the forthcoming year are detailed within the Appendix A.
- 6.3.2 Due to the need to reduce the cost of delivering Council services it was necessary to restructure the Trading Standards Service in July 2014 to realise efficiency savings, which will mean we have to adapt the way that food interventions are carried out.
- 6.3.3 We will continue to develop our content on the Councils website and through the newly introduced use of Facebook and Twitter to improve the provision of information to the public and businesses as well as developments with the ability to email our food business operators with current information. Interventions with our Category E premises for food hygiene continue to cause issues with the lack of resources to fully comply to the satisfaction of the FSA. We continue to work at refining the way we handle these premises and await the outcome of Regulating our Future the current review being undertaken by the FSA which might shape the way we need to work with these businesses in the future.
- 6.3.4 We will continue to take part in sampling surveys both nationally, regionally and locally with relevant partners to achieve common goals in standards, health and nutrition, as well as looking for increased value for money for the services we operate.
- 6.3.5 Development of an intelligence based approach to food standards enforcement through the Intelligence operating model.
- 6.3.6 Partnership working with the FSA National Food Crime Unit and the development of proceeds of crime investigations into food crime to target criminal monies.

Areas for Improvement	Appendix A
Action	Outcome
1. Address the matters noted in the action plan produced in response to areas identified by the Food Standards Agency Audit report.	Work towards aims set out within the action plan and meet the deadlines set.
2. Produce various promotional articles for businesses etc. to be distributed regularly via the email database developed.	Improved promotional work within the food safety service
3. To continue to carry out consistency training with officers in-house but also across boundary whenever possible.	Ensure the food hygiene rating scheme is being applied fairly and consistently to all businesses.
4. Ensure we are in a position to apply to the FSA for additional funding for project work and to deliver such work	Deliver an extended service beyond our own financial constraints which benefits consumers and businesses within the County
5. Monitor more closely the number of Category E food hygiene interventions achieved.	Aim to achieve 100% of Category E food hygiene interventions are achieved at least every 3 years as required by Code of Practice.

Performance Measures

Appendix B

Description	Performance 2016/2017		Performance 2017/2018		Performance 2018/2019		Performance 2019/20	
	Target	Actual	Target	Actual	Target	Actual	Target	Actual
PPN/001 The percentage of high risk businesses that were liable to a programmed inspection that were inspected for:								
Food Hygiene	100%	100%	100%	100%	100%	100%	100%	
Trading Standards	100%	100%	100%	90.96%	100%	98.11%	100%	
PPN/005 The % of new businesses identified during the year which were:								
a)subject to an inspection by each of the following areas:								
Food Hygiene	95%	94.56%	95%	100%	95%	100%	95%	
Trading Standards	55%	50.95%	55%	55.74%	55%	36.16%	55%	
Percentage of Broadly Compliant Food Premises	90%	96.01%	90%	96.09%	90%	95.55%	90%	

Environmental Health

Food Hygiene and Infectious Disease Control Budget

	17/18	18/19	19/20
Other APT & C – Pay	£386,700	£380,760	£379,060
Other APT & C – NI	£34,760	£34,380	£34,320
Other APT & C – SUP	£99,220	£102,020	£106,000
Eye Tests	£40	£40	£0
Professional Subscriptions	£1,260	£1,260	£1,260
Travel Expenses - Staff	£11,500	£11,500	£11,500
Staff Expenses	£0	£0	£240
General Equipment	£850	£850	£1,050
General Office Expenses	£300	£700	£700
Laundry	£200	£200	£200
Telephone Line Call Charges	£500	£500	£500
Subsistence Allow Staff	£50	£50	£0
Conference Exp. Staff	£150	£150	£0
Catering Provisions	£50	£50	£50
Analysts Fee	£500	£500	£0
Other Hired & Contract Service	£1,240	£1,940	£2,440
Purchase Of Test Samples	£200	£200	£0
Telephone Recharge (IT)	£500	£500	£500
Fees, Tolls & Charges	-£32,040	-£33,000	-£32,260
Recovery Of Court Costs	-£400	-£400	-£400
Grants - Other	£1,860	£0	£0
Access to Services	£19,230	£22,170	£14,070
Business Support	£2,200	£0	£0
Commercial Services	£80	£0	£0
Employee Insurance	£1,040	£1,710	£1,710
Employment Services	£2,280	£3,970	£2,940
Finance	£6,190	£740	£15,350
Human Resources	£4,060	£7,180	£2,400
Income and Awards	£2,490	£9,660	£12,450
Information Management	£1,010	£0	£0
Information Services	£36,170	£32,440	£29,190
Legal Services	£6,860	£7,320	£8,690
Leased Car Insurance	£690	£720	£720
Office Accommodation	£18,450	£17,560	£17,560
Graphic Design	£0	£160	£0
Purchasing	£0	£60	£60
Modern Records	£0	£1,000	£1,070
Head of Regen, Prop & Commissioning	£0	£0	£21,570
Total Excluding recharges	£507,440	£502,200	£505,160
Total Including recharges	£608,190	£606,890	£632,940

Appendix D

Trading Standards

Trading Standards – Business Team Budget 2019/20

	Full Year Budget (£)
BUSINESS SUPPORT TEAM	241,730.0
OTHER NJC STAFF PAY	190,060
OTHER NJC STAFF NI	18,040
OTHER NJC STAFF SUP	53,110
PROFESSIONAL SUBSCRIPTIONS	1,140
STAFF TRAVEL	5'060
STAFF TRAINING	500
VEHICLE LEASES	2,940
BOOKS AND PUBLICATIONS	200
GENERAL OFFICE EXPENSES	600
EQUIPMENT PURCHASE	600
SUBSCRIPTIONS	1,200
TELEPHONES – LANDLINE	100
TELEPHONES – MOBILE	500
OTHER SERVICES	15,500
BUDGET REDUCTIONS TO BE FOUND	-20,000
COST RECOVERY	-3,000
STAFF LEASE CARS	-1,470
LICENCES	-7,620
OTHER SALES	-200
OTHER SERVICES	-11,330
LOCAL AUTHORITY CONTRIBUTIONS	-1,600
OTHER CONTRIBUTIONS	-4,000
INTERNAL PRINT AND POSTAGE	1,400

Food Sampling Costs 2019/20 (£9,500)

Month	Sample	Code	Cost per Individual Sample (£)	Total Sample Cost (£)	Total Cost (£)
April	N/A	N/A	N/A	N/A	N/A
May	N/A	N/A	N/A	N/A	N/A
June	6 x gluten	WLA8A	£92	552	552
July	6 x fried rice egg allergy & crustacean allergy	WLA8J / WLA8M	£92 +£92 (£184)	1104	1656
August	7 x meat content	WLA6G	£131	917	2573
	7 x colours in sauce	WLA1A	£121	847	3420
September	7 x honey Sugar Profile & HMF	WLA11A / WLA11B	£85 + £87 (£172)	1204	4624
October	4 x milk chocolates	WLA2A / WLA2B	£82 + £54 (£136)	544	5168
November	6 x colours in pilau rice	WLA1A	£121	726	5894
	6 x colours / peanuts allergen in sauce	WLA1A / WLA8E	£121 + £92 (£213)	1278	7172
December	5 x fish speciation	WLA5B	£180	900	8072
January	5 x beer/cider alcoholic strength & SO2	WLA4J	£105	525	8597
	1 x moonshine alcoholic strength	WLA4D	£70	70	8667
February	4 x meat content	WLA6G	£131	524	9191
March	N/A	N/A	N/A	N/A	9191
				Total Cost	£9,191

Food Sampling Plan 2019/2020

Powys will be participating in the following sampling surveys over the forthcoming year:

1. **WFMF All Wales Shopping Basket** – the Local Authority will be participating in this survey when no other survey prevails.
2. **Approved Premises/Manufacturers** - on occasions throughout the year, samples from approved premises/manufacturers will be submitted for surveillance.
3. **Imported Food** - Imported Ready-to-Eat Foods during the year
4. **Potable Water at Mobile Premises** – the authority may be undertaking surveys on potable water from mobile premises during the year.
5. **WFMF Surveys** - Powys will be participating in targeted surveys set by WFMF including:
 - Survey of mobile vendors – water, food and swab samples
 - Ice creams, Gelato and Slush

We will continue to sample according to limits set by the lab.

Appendix G

Food Intel April 18 – March 19

Number	Date	Database Ref	Type of Intel	Brief details
1.	09/05/2018	WAIR00019085	FOOD	2 x unsatisfactory samples - The Palace, Llansantfradd
2.	02/07/2018	WAIR00021233	FOOD	Possible re-opening of Caerfagu as Sausage casing Processing plant
3.	07/08/2018	WAIR00019911	FOOD	Deficient Sausage Sample
4.	19/09/2018	WAIR00021173	FOOD	Tafarn-y-Garreg, Brand substitution
5.	09/11/2018	WAIR00020537	FOOD	Brand substitution Coach and Horses llangynidir
6.	09/11/2018	WAIR00020538	FOOD	Brand substitution Coach and Horses llangynidir
7.	14/11/2018	WAIR00020607	FOOD	Fraudulent paperwork
8.	30/11/2018	WAIR00020898	FOOD	Imported Food supplements - own use
9.	02/12/2018	WAIR00020897	FOOD	Small Farms Hay on Wye - Misrepresenting meat
10.	05/12/2018	WAIR00020736	FOOD	Concern over the slaughter of Turkeys
11.	16/01/2019	WAIR00021106	FOOD	Unsatisfactory sample - colour in rice - Raj Mahal
12.	18/02/2019	WAIR00021513	FOOD	Adverse meat ball sample - Welsh Sausage Co
13.	06/03/2019	WAIR00021707	FOOD	Unsatisfactory labelling - Morgans butcher
14.	06/03/2019	WAIR00021708	FOOD	Unsatisfactory labelling – Bujok
15.	27/02/2019	I109958	FOOD	Morrisons Welshpool – food past use by dates
16.	24/01/2019	I109998	FOOD	Unsatisfactory labelling on Bee Welsh Honey -
17.	27/09/2019	I110002	Food	Unsatisfactory labelling on Radnorshire Honey – Skylark NoW
18.	28/08/2018	I109960	FOOD	Unsatisfactory labelling on Gluten Free Blackberry and Apple crumble from Sidoli's
19.	12/07/2018	I109963	FOOD	Wilderness Brewery - Unsatisfactory Sample of Pale Ale – Alcohol above Strength declared
20.	12/07/2018	I109963	FOOD	Wilderness Brewery - Unsatisfactory Sample of Pale Ale – Alcohol above Strength declared
21.	20/09/2018	I109966	FOOD	Hilltop Honey – HMF level 55% above what is allowed for that type of honey
22.	19/11/2019	I109973	FOOD	Mirchi – Peanut free dish contained peanut01/03/2019
23.	15/05/2018	I109604	FOOD	Bruce Williams – incorrect labelling of sausage
24.	17/12/2018	I110016	FOOD	Zeera Brecon – Unsatisfactory sample – artificial colours in rice
25.	02/10/2018	I109975	FOOD	Tafarn-y-Garreg, Penycae – Dipstick test following complaint proved Smirnoff genuine.
26.	15/01/2019	I109978	FOOD	R10735L - Welsh Mountain Moonshine – Charred Oak Distilled Grain Spirit unsatisfactory in relation to various labelling matters
27.	15/01/2019	I109607	FOOD	R10736L - Welsh Mountain Moonshine – Apple Pie' unsatisfactory in relation to various labelling matters

28.	23/03/2019	I109996	Food	TrailHead – unsatisfactory sample Beef Jerky M10738L
29.	20/02/2019	I109605	Food	Super Diner – non permitted colours in rice R10743L
30.	20/02/2019	I109580	FOOD	Super Diner – non permitted colours in Passanda R10742L
31.	26/07/2018	I110008	FOOD	Treetops (RWS) allegation that products were not “Welsh”
32.	24/07/2018	I110006	FOOD	Burger van on plot 355 at RWS advertising Welsh burgers but not Welsh burgers
33.	16/07/2018	I110011	FOOD	Lithic Brewing – unsatisfactory sample – Labelling and Allergen issues
34.	17/09/2019	I110013	FOOD	Robing Whalley, Cwm Oergwm, unsatisfactory honey sample – labelling issue
35.	28/01/2019	I110014	Food	Red Indigo Hay on Wye, unsatisfactory sample – non permitted colours in sauce