

# Feed and Food Law Service Plan

2018/2019

# FEED AND FOOD CONTROLS SERVICE PLAN 2018/19

## 1. Service Aims and Objectives

### 1.1 Aims and objectives

The aims of Public Protection and Regulatory Services (“the Service”) are to protect the health and wellbeing of all persons within the City in relation to food safety matters and, in relation to animal feed, to protect the health and welfare of livestock and prevent the outbreak of animal disease.

Our objectives are:

- To secure compliance with food safety law having regard to official codes of practice; particularly concerning the frequency of food safety interventions;
- To seek to secure the protection of consumers from the potential dangers of suspect or contaminated food; particularly those which may result in foodborne infections;
- To ensure so far as is reasonably practicable that food is fit for human consumption and free from extraneous matter;
- To increase the knowledge of food handlers, food managers and the general public about the principles and practice of food hygiene and food safety management;
- To increase the knowledge of food business operators of food safety management; thereby assisting the raising of standards and enabling improved food hygiene rating scores under the National Food Hygiene Rating Scheme;
- To assist in the control and prevention of the spread of foodborne diseases;
- To carry out food safety interventions (activities that are designed to monitor, support and increase food law compliance within a food establishment) in accordance with minimum frequencies and to standards determined by the Food Standards Agency (“the FSA”);
- To respond to and investigate Food Standards Agency ‘Food Alerts and Allergy Alerts for Action’ in accordance with published guidance where these impact upon food originating or traded within the City;
- To investigate all notified cases of foodborne disease and take effective action to control the spread of infection;
- To undertake the inspection of ships visiting the Port of Sunderland in accordance with current guidance;

- To carry out inspections at premises presenting the highest potential risk for contamination of the feed chain;
- To conduct on farm visits in order to examine primary production and animal feeding;
- To investigate complaints about feed and, where necessary, take samples;
- To give guidance to people supplying material into the feed chain and also to new livestock keepers.

## **1.2 Links to corporate objectives and plans**

The Sunderland City Council Corporate Plan sets out the vision for the Council and outlines the strategic direction of the Council over a four year period. The Corporate Plan highlights three key priorities; one of which is:

**Regenerating the City** – growing the economy, improving education and skills and improving health and well-being.

The delivery of this plan will contribute positively to the achievement of this priority by, among other means:

ensuring the protection of public health through inspection and education activity;

protecting the livestock of our local farms from contaminants in their feed that could harm their health and welfare; and

proportionate enforcement which provides a fair and equitable trading environment in which businesses can develop and be protected from those who fail to comply with the law.

## **2. Background**

### **2.1 Profile of the Local Authority**

Sunderland City Council serves an area of 137 square kilometres and has a population of around 283,500 people resident in some 121,000 households. The City principally comprises urban areas, the City Centre and Washington, as well as the former coalfields communities of Easington Lane, Hetton-le-Hole and Houghton-le-Spring. A small number of farms surround the urban population centres.

### **2.2 Organisational Structure**

The Council is composed of 75 councillors within 25 wards. Governance is through the Leader and Cabinet model.

This Feed and Food Controls Service Plan is delivered by staff from Public Protection and Regulatory Services within the Economy and Place Directorate. The service operates within the remit of the City Services Portfolio and works closely with the Portfolio Holder and Deputy Cabinet Member.

The Chief Operating Officer - Place reports to the Executive Director of Economy and Place on a number of matters including feed and food control. Public Protection and Regulatory Services deliver the Environmental Health, Trading Standards and Licensing functions on behalf of the Council. These services are led by the Head of Public Protection and Regulatory Services who has overall responsibility for delivery of the Feed and Food Controls Service Plan.

The Environmental Health Manager has specialist responsibility for food hygiene and standards matters. The Trading Standards and Licensing Manager has specialist responsibility for feedingstuffs.

The Council uses the services of Public Health England Laboratories, a Public Analyst and an Agricultural Analyst as necessary. The Public Analyst and Agricultural Analyst appointed by the authority is Public Analyst Scientific Services Limited.

## **2.3 Scope of the Feed and Food Service**

The activities relating to feed and food in the City are undertaken by the Trading Standards and Environmental Health teams.

The Environmental Health team undertake a programme of food hygiene interventions as well as responding to requests for service and infectious disease notifications. Sampling of foodstuffs, both microbiological and compositional, is also undertaken. Officers also respond to Port Health requests and food hygiene inspections are undertaken in connection with Ship Sanitation Certificates required under international health regulations.

The City has a small agricultural sector; principally arable with a few livestock holdings. The Trading Standards team carries out the enforcement of primary production and feedingstuffs legislation and provides advice to farmers and retailers. The Trading Standards team also have responsibility for food standards.

## **2.4 Demands on the Feed and Food Service**

### **2.4.1 Food establishments profile**

There are 2100 food premises currently operating in the City, including one registered primary producer.

<b>Types of Food Premises in the City</b>	<b>No.</b>	<b>Food Hygiene High Risk (A)</b>	<b>Food Hygiene Medium Risk (B)</b>	<b>Food Hygiene Medium Risk (C)</b>	<b>Food Hygiene Medium Risk (D)</b>	<b>Food Hygiene Low Risk (E)</b>	<b>Not rated</b>
Manufacturers /packers/ primary producers	90	0	7	21	8	56	0
Importers/ exporters/ distributors etc.	27	0	1	1	9	20	
Retailers	548	0	3	56	252	227	2
Restaurants/ other caterers	1435	0	60	442	693	258	8
Contact materials and articles	0	0	0	0	0	0	0
<b>Total food premises</b>	<b>2100</b>	<b>0</b>	<b>71</b>	<b>520</b>	<b>962</b>	<b>561</b>	<b>10</b>

Most of Sunderland's food premises are classified in the restaurant/catering outlet group (1435) whilst there are 548 food retailers. These categories feature a large number of changes of food business operators. This creates additional demands for the Service in educating new operators.

There are a significant number of outdoor events held regularly each year (e.g. the International Air Show) which are attended by up to 1.5 million visitors. This year, Sunderland is also host to the Tall Ships Race at the Port of Sunderland, which is anticipated will to attract large numbers of visitors. Various mobile caterers and food businesses from around the region visit the City to cater at these events.

Port health inspections which require inspections of food hygiene and standards on board vessels coming into the port are undertaken. The provision of nine Ship Sanitation Certificates was requested from the Service last year in addition to four visits to take water samples being undertaken.

#### **2.4.2 Feed establishments profile**

There are currently 81 premises registered as Feed Business Operators.

<b>Types of Feed Premises</b>	<b>Number</b>
Arable farms	11
Livestock farms	29
Manufacturers and packers	6
Food businesses selling co-products/surplus food	23
Distributors / transporters	5
Stores	7
<b>Total</b>	<b>81</b>

The arable farms principally produce cereal for food production or for incorporation in animal feed. Inspections of these premises are on a low risk basis. Several of the farms are members of farm assurance schemes.

The livestock farmers generally grow arable crops for feeding to their own livestock along with silage. The use of supplementary feed is generally restricted to sheep and pigs. Visits to these premises are generally scheduled when the animals are housed and are undertaken in conjunction with animal health and welfare visits.

Sunderland has a number of pet treat manufacturers who operate from their residential properties. All have been assisted with advice on their legal obligations regarding both Feed and Animal by-Products. The premises may be visited for sampling purposes.

As supermarkets in particular find more environmentally friendly ways to dispose of their waste food, the recent upward trend in businesses sending these products into the feed chain has diminished somewhat. However, this is a relatively volatile market which could find feed being reinstated as the disposal route of choice. Following potential issues previously identified on inspection, all premises registering to supply waste food into the feed chain will be inspected.

One registered transporter removes waste food from shops for use in the manufacture of feed. The others are haulage companies who transport feed material (that can generally be used for other applications) on an occasional basis.

Increased vigilance continues to be undertaken with regard to the inland enforcement of imported feed legislation in an effort to prevent the spread of disease in food animals.

### **2.4.3 Service delivery points**

The officers who undertake food and food controls work are based at Jack Crawford House, Sunderland. The Council's Customer Service Centre in Fawcett Street, Sunderland is open to the public during normal working hours throughout the week, 8.30am to 5.15pm (4.45pm Friday), although officers from the Environmental Health and Trading Standards teams may be contacted by businesses directly. There is an evening and weekend service arrangement for contacting managers for out-of-hours emergencies. Visits are conducted at events and as necessary outside normal working hours.

The Council website: [www.sunderland.gov.uk](http://www.sunderland.gov.uk) encourages the public to communicate with the Service by email and makes information constantly available. Letters from the Service to customers / companies encourage the use of email. Initial contact for services to the public is through the Council's Customer Services Network.

The Council displays current food hygiene ratings on the [www.sunderlandcitycouncil.com](http://www.sunderlandcitycouncil.com) website. This website may also be accessed from the [sunderland.gov.uk](http://sunderland.gov.uk) website (Food Hygiene). The Council also regularly updates data on the Food Standards Agency national scheme. Ratings can be found at <http://ratings.food.gov.uk>

The Food Hygiene Rating Scheme involves the publication of a food safety rating for food premises in the City. The scheme is based on standards of structure, hygiene and confidence in management scores assessed during programmed inspections. Following inspections, business owners are advised in writing that the information may be available via the website in the future and in response to third party requests as required by Freedom of Information legislation. Where improvements have been made to a business, the food business operator has the right to request a re-visit for re-inspection.

#### **2.4.4 External factors impacting upon the Service**

The Freedom of Information Act 2000 and the Data Protection Act 2018 impacts on the workload of the Service due to the administration of requests for service and time spent recovering the information. Press and other enquirers often request specific information with a view to making comparisons of businesses in various local authority areas. In the past year, the Service responded to fourteen requests for information regarding food premises.

The Service's responsibilities under the Licensing Act 2003 also impact on workload. Officers consider applications for new and varied licences for food premises in pursuance of duties as responsible authorities.

There is a possibility that any large outbreak of food poisoning or illness, or a serious accident at food premises, would impact significantly on the routine activities of the Service.

There are no other likely major impacts upon the Service expected, e.g. significant food imports, seasonal variations or an increase in the number of

food manufacturing businesses. However, where food alerts necessitate a significant response, this will impact upon the Service.

Food alerts are notified to local authorities by the Food Standards Agency. During 2017/18 the Service received 36 alerts of food problems occurring elsewhere in the country. Many of these alerts were product recalls where the response required from the Service was limited.

The Food Standards Agency also notifies local authorities of allergy alerts, e.g. instances of food labelling errors or contamination of specific ingredients. There were 95 such alerts received in 2017/18. Whilst not critical to general public health, such incidents can have serious effects on persons who are allergic to specific ingredients.

## **2.5 Regulation Policy**

Public Protection and Regulatory Services has a documented Enforcement Policy covering the Environmental Health, Trading Standards and Licensing functions of the Council. The Service works within the principles of the Regulators' Code.

## **3. Service Delivery**

### **3.1 Interventions at Food and Feedingstuffs establishments**

Food premises in the City have been found to demonstrate an annual increase in the level of compliance over the last eight years, with the percentage of all premises achieving a three star rating or above increasing from 83% to 96.2%. Within these figures the number of premises achieving a food hygiene rating of five has remained consistent, demonstrating that good premises are maintaining their high standards across the city.

The Service will use the wide range of interventions outlined in FSA guidance in order to monitor and increase business compliance in the most efficient and proportionate way.

Interventions are defined as activities that are designed to monitor, support and increase food law compliance within a food establishment and they include but are not restricted to the following "official controls":

- Inspections and audits (full/partial inspection and audits);
- Monitoring;
- Surveillance;
- Verification; and
- Sampling and analyses where examination is carried out by an Official Laboratory.

When undertaking official controls, officers will take account of any identified risks, the food business operator's past record and current knowledge, an examination of practices and procedures in place, a physical inspection of the

premises, the reliability of an operator's own checks, and any information that may indicate non-compliance.

Other interventions that do not constitute official controls can be undertaken in some premises in addition to the official control or at an interval between official controls. These include:

- Education;
- Advice and coaching;
- Information and intelligence gathering; and
- Sampling where examination is not carried out by an Official Laboratory.

Premises will continue to be identified in categories ranging from A to E depending on the previous level of food safety and structural compliance together with confidence in management. Factors also taken into account are the types of food prepared and the type and number of consumers potentially at risk.

Those food premises which fall into the highest risk categories are considered to be those with the highest risk, whether as a result of the nature of the main activities undertaken on the premises or because of the relatively poor operating conditions which have prevailed previously. These premises will be subject to controls more frequently than lower risk premises.

The approach to last year's intervention programme was to target the poorest performing premises across the City. This was achieved by providing tailored support and time to business operators who have fallen below a rating of three in the Food Hygiene Rating Scheme. The service provided initial support and education, and as a last resort, undertook enforcement activity, in order to achieve sustained higher standards across the City for the benefit of all residents. There were 27 premises in total that were targeted in this way during the course of the last financial year. At the end of the process, 19 premises were re-rated as at least broadly compliant. Of these, 13 achieved a rating of three stars, and 3 achieved a rating of four stars. There were 4 premises that closed down in this time. Seven food hygiene notices were served as a result of this programme and compliance followed in each case.

This year, we intend to again concentrate in a focussed way upon providing tailored support to food business operators who have fallen below a rating of three stars in the Food Hygiene Rating Scheme. Our aim will again be to place additional focus on the poorer premises in order to secure measurable improvements in their hygiene compliance and star rating.

The intervention programme will enable us to undertake a lighter touch control with regard to some of the businesses that are due an intervention this financial year and that:

have been historically compliant with good hygiene practices;  
have a hygiene rating of three or above, and  
have been risk rated into category D.

Those higher risk and lower performing premises rated 0-2 stars that require focussed attention will be subject to additional visits in order to secure robust improvement and eventual compliance with hygiene standards. In addition we will visit all new or currently unrated businesses.

In summary the predicted numbers of interventions are as follows:

- All high risk category A rated premises will receive an inspection (2 premises);
- All high risk category B premises will receive an inspection (60 visits);
- All premises which are not generally satisfactory i.e. those businesses with a rating between 0 and two stars on the Food Hygiene Rating Scheme, will receive a full inspection (16);
- There are 321 compliant category C premises and 412 compliant category D premises due an intervention this year. All category C businesses will be subject to an official control. This will be either an inspection or an audit, depending on the size and scope of the business. Some category D businesses will be targeted by other measures, such as the completion of a self-assessment questionnaire and verification visits;
- Generally lower risk compliant category E premises (161) will be targeted by self-assessment questionnaires with the results informing future intervention decisions; and
- All new businesses will receive an inspection, and following that visit will be risk rated accordingly.

The total estimated number of interventions is therefore 972 in addition to those pertaining to any new businesses established within the year. Alternative strategies for lower risk premises will result in fewer such premises being visited than in previous years but, potentially, more visits being made to less well performing premises in order to promote and confirm improved standards.

In line with our commitment to carry out inspections on new businesses and revisits to check on compliance where necessary, it is estimated that the above-mentioned planned interventions will generate a further 300 visits.

The Service aims generally to undertake interventions at premises within one month of the due date for inspection; the only exceptions being those businesses that operate seasonally and those which may be subject to alternative enforcement strategies.

Secondary inspections (including revisits and requests for revisits by operators of food businesses) will be undertaken as necessary on a risk assessed basis in order to ensure that any significant hygiene concerns are rectified. Those

premises which are not broadly compliant will be visited with a view to enforcing compliance standards.

Individual businesses may be visited more frequently or the planned date for intervention may be brought forward if a problem is identified such as:

- A complaint about the food premises or notification of an issue received from another authority which requires further investigation;
- An unsatisfactory sampling result is received;
- The business is implicated in a food poisoning outbreak;
- There is a change in business operations resulting in a higher risk;
- A request for a re-rating revisit under the FSA Food Hygiene Rating Scheme is received; or
- A notification is received from the FSA regarding a food safety incident or food alert.

All requests for revisits by businesses wishing to amend their risk ratings as part of the National Food Hygiene Rating Scheme will be carried in accordance with FSA procedures. Whilst the published rating of the business may be changed as a result of this revisit, the Service will need to examine sufficient elements of the business and have sufficient evidence from this intervention if any change to the intervention frequency for the business is to be considered. Otherwise the business will retain its original risk rating score for frequency of intervention

The City, being principally urban in nature, has only a small number of feedingstuffs premises registered. None of the premises registered are considered to be high risk. The premises will be visited on a risk assessed basis. Last year there were sixteen inspections and two revisits undertaken at feed establishments.

The Service has good working relations with neighbouring authorities and the Public Analyst should any specialised process be identified. Sunderland City Council Feed Officers respond to requests for assistance received from those colleagues in neighbouring authorities with regard to queries that they receive.

### **3.2 Feed and Food Complaints**

The Service is committed to responding to all complaints about feed or food. The extent of the investigation will depend on the merits of the complaint. This can range from re-assuring the complainant to a more formal process, including reference to home or originating authorities in accordance with the guidance and the relevant Code of Practice. Officers also liaise with any relevant primary authority in pursuance of the relevant scheme administered by the Regulatory Delivery directorate of the Department of Business, Innovation and Skills.

In 2017/18, 876 requests for service requiring a response from officers were made including 408 enquiries relating to foodborne illnesses, 130 general

requests for service in relation to food businesses, and 95 general food complaints.

Due to the relatively few number of feedingstuffs establishments, it is not anticipated that there will a significant number of complaints received by the Service. Any complaints will be investigated in line with Service procedures. The Service received one complaint last year which related to feedingstuffs. Pet foods are anticipated as being the most likely subject of complaints.

### **3.3 Home Authority Principle and Primary Authority Scheme**

The Service undertakes to comply with all the relevant legal requirements of the Primary Authority Scheme and liaises with other relevant local authorities within the context of the Home Authority Principle

### **3.4 Advice to Business**

The Service seeks to assist local businesses in order to encourage the success of our local economy. Last year 35 specific requests for advice were received by the Environmental Health and Trading Standards teams. Additionally, advice is given by officers informally at every visit to food premises, as appropriate.

The Service is committed to promoting the Food Standards Agency's project: "Safer Food, Better Business" which is intended to support food businesses in complying with the food safety management principles. There will continue to be great efforts to educate businesses in complying with their requirement to implement a suitable food safety management system, which some smaller food businesses seem to find difficult

In correspondence to food businesses, a standard invitation is given to them to seek advice from the Service.

An increasing number of business start-ups in manufacturing pet treats have been provided with business advice. Further advice is given on inspection and new livestock keepers are provided with guidance when registering their premises.

### **3.5 Feed and Food Sampling**

The Service is committed to sampling foods in order to determine compliance with compositional and bacteriological standards. Sampling of imported and locally produced foods is undertaken proactively and the Service participates in national and regional surveys arranged by the regional food authorities group and Public Health England Laboratory Service.

An estimated 50 samples will be taken for bacteriological examination/compositional analysis in the year 2018/19. This includes participation in the collection of samples for four cross-regional surveys. In addition to this, it is estimated that we will take a further 30 water samples.

The Public Health England Laboratory transports samples from the region as necessary by courier to York. The Service liaises with the management of the laboratory and neighbouring authorities in order to facilitate an effective and co-ordinated sampling programme with flexibility for local needs.

Participation with neighbouring authorities in sampling and other food-related matters ensures that the Service works in a co-ordinated and compatible way.

Sampling of feed will take place as appropriate following the receipt of requests for service, although there is no expectation of any such requests. Samples may be taken to assist in projects instituted by the Food Standards Agency or the North East Trading Standards Association or to maintain competence levels.

### **3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease**

The Service has agreed with Public Health England a policy for considering the investigation of confirmed food poisoning cases. The unwell people involved in most cases, other than in the case of suspected viral infections or *Campylobacter* infection, are usually contacted by officers in order to trace the source of the infection and prevent further spread. People involved in *Campylobacter* cases are contacted by letter.

The local Consultant for Communicable Disease Control, employed by Public Health England, will provide the Service with advice regarding specific problems relating to infectious disease.

Medical practitioners, where suspected cases of food poisoning are confirmed following analysis of a sample, have a legal duty to inform the Council. The Service liaises closely with relevant laboratories and Public Health England in order to effectively investigate all such cases.

Regular meetings are arranged regionally with local representatives of Public Health England in order to discuss various matters relating to food poisoning cases and sampling programmes. The Public Analyst and Public Health England will be contacted in order to assist with expertise where any additional problems arise. Similar networks exist within the regionally and nationally involving the Chartered Institute of Environmental Health and the Food Hygiene Forum.

#### **Statistics of cases notified over recent years**

YEAR TO 31 MARCH	CAMPYLOBACTER	SALMONELLA	CRYPTOSPORIDIA	SUSPECTED FOOD POISONING	SHIGELLA	ESCH. COLI	OTHER MISCELLANEOUS ORGANISMS	TOTALS
2009	306	58	26	24	5	2	2	423
2010	357	52	38	12	4	4	4	471
2011	440	28	27	11	3	2	0	511
2012	286	38	17	6	2	12	2	363
2013	329	40	48	19	2	3	3	444
2014	353	35	29	61	5	4	10	497
2015	292	28	18	38	4	4	27	411
2016	150	43	30	48	1	2	37	311
2017	152	54	39	47	3	5	57	357
2018	228	33	33	84	1	2	27	408

YEAR TO 31 MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	JANUARY	FEBRUARY	MARCH	TOTALS
2009	19	35	50	48	48	41	50	36	22	20	28	26	423
2010	28	38	66	44	40	56	56	41	24	21	24	33	471
2011	37	28	57	90	58	47	57	46	23	21	23	24	511
2012	26	43	30	39	47	32	33	27	24	24	26	12	363
2013	27	36	56	38	36	65	54	29	20	24	29	30	444
2014	23	46	48	49	45	50	76	47	21	36	38	28	497
2015	23	35	42	37	57	37	54	33	17	42	18	16	411
2016	17	18	23	39	31	27	38	24	29	21	19	24	311
2017	24	20	40	27	52	33	32	34	24	35	15	21	357
2018	8	20	43	34	39	42	38	26	15	12	23	24	324

### 3.7 Feed/Food Safety Incidents

The Service is committed to responding appropriately to all Feed and Food Alerts issued by the Food Standards Agency in accordance with the relevant code of practice. The level of response is determined by the category of response required and the individual circumstances of the incident.

### 3.8 Liaison with other organisations

The Service seeks to co-operate in joint working with other local authorities in the North East. In relation to animal feed, information sharing and joint working is coordinated by the North East Trading Standards Association (NETSA) and via the Local Government Association Knowledge Hub. In respect of food matters, Environmental Health Officers liaise with colleagues via the North East Food Liaison Group and the North East Sampling and Public Protection Groups.

Officers of the Service meet with our six neighbouring authorities, i.e. those in Tyne and Wear, Durham and Northumberland, in the North East Food Liaison Group. This group facilitates close cooperation between the representatives. Officers are also involved with sampling sub-groups, the combined North and South of Tyne meetings involving Public Health England, Local Authorities and the Primary Care Trust. These meetings involve representatives from the relevant bacteriological laboratories and communicable disease specialists.

Officers liaise frequently with Council colleagues in connection with food matters, including catering and school meals, and with regard to building control and planning applications.

### **3.9 Feed and Food Safety and Standards promotional work**

The very small number of feed establishments registered within the City does not make promotional work on any scale viable. Imparting information on the importance of feed control is restricted to business advice given on inspection.

Basic food hygiene information for consumers is available on the Council's website.

## **4. Resources**

### **4.1 Staffing Allocation**

Environmental Health personnel specialising in food comprise:

- 1 Principal Environmental Health Officer – 0.7 Full time equivalent (FTE)
- 4 Senior Environmental Health Officers - 2.9 FTE
- 2 Technical Officers - 1.3 FTE
- 2 Senior Trading Standards Officers (part time on food standards) - (0.5 FTE)

All food-specialist Environmental Health Officers have over two years' experience in food matters and are fully competent in accordance with the Food Law Code of Practice.

Additionally, Environmental Health Officers working on other specialist areas of law are building competencies in food safety in order to provide support and assist in periods of high demand.

**Total of Environmental Health Officers allocated to Food work: 4.9 FTE**  
**Total of other officers: 0.5 FTE (TSO officers undertaking standards work)**

Trading Standards personnel specialising in feed law comprise:

- 2 Senior Trading Standards Officers (part time on feed matters) - (0.25 FTE)

### **4.3 Staff Development Plan**

Staff appraisals are undertaken annually and the findings are included in staff development and training plans. A competency matrix has been developed in line with the requirements of the Food Law Code of Practice and training needs have been assessed. An action plan in order to ensure that personnel are fully competent commensurate with the activities assigned will be delivered during the current year. Individuals will receive specific training where appropriate and all food-specialist Environmental Health Officers will complete the required ten hours of food-specific Continuing Professional Development.

The Service cooperates regionally through the Food Liaison Group and with the Food Standards Agency in order to source low cost training.

Training days and training sessions on subjects are programmed as necessary.

Any inexperienced officers assigned to food work are supervised and receive training commensurate with the Code of Practice.

Officers enforcing feed work undertake training provided by the FSA and will utilise online training provided by the Chartered Trading Standards Institute.

## **5. Quality Assessment**

A documented internal monitoring procedure in accordance with Article 8 of Regulation (EC) No. 882/2004 (Official Feed and Food Controls), the Food Law Code of Practice and centrally issued guidance will be reviewed and updated annually.

Monitored inspections are recorded on a database in addition to random file checks, case load meetings and specific premises interventions.

Visits to feed establishments are recorded and feedback on the inspection provided to the business operator. Annual returns on activities are provided to the FSA.

## **6. Review**

### **6.1 Review against Service Plan**

A review of the plan will be undertaken mid-year with consideration of achievements against targets. In the periods either side of the mid-year review, managers monitor progress with case loads and regular meetings.

The Service carried out high rates of planned interventions of food premises in 2017/18 with 1091 food premises being visited. A total of 1343 visits were made including inspections, revisits and sampling. There were no inspections outstanding at the year end.

## **6.2 Identification of any variance from the Service Plan**

Any variance from the Service Plan will be reported at the Service's senior management team meetings. Any proposed changes and redeployment of resources will be entered into the meeting minutes.

## **6.3 Areas of Improvement.**

Continually developing the service to improve our delivery in response to changes brought about by the Food Standards Agency's 'Food Law Code of Practice 2017'.

On-going review and development of operating procedures, including a review of the premises inspection pro-forma, will be undertaken in order to assist with the consistency of planned interventions.

Establishing and targeting workload priorities with available resources which deliver and maintain the best achievable levels of public health protection, through the development of alternative approaches to business engagement.