
Bath & North East Somerset Council

Improving People's Lives

Official Feed and Food Control Delivery Plan 2023 /24



Bath and North East Somerset Council Feed and Food Service Plan 2023/24

Contents

		Page
1	Service Aims and Objectives	4
1.1	Introduction	4
1.2	Aims and Objectives	4
1.3	Links to corporate objectives and plans	5
2	Background Information	5
2.1	Profile of Bath and North East Somerset	5
2.2	Organisational Structure	6
2.3	Scope of the Service	6
2.4	Demands on the Service	8
2.5	Regulation Policy	9
3	Service Delivery	10
3.1	Interventions at Food and Feedstuffs establishments	10
3.2	Feed and Food complaints	12
3.3	Primary Authority Scheme	12
3.4	Advice to Business	12
3.5	Feed and Food Sampling	13
3.6	Control and Investigation of Outbreaks and Food Related Infectious Disease	14
3.7	Feed/Food Safety Incidents	15
3.8	Liaison with other Organisations	16
3.9	Feed and Food Safety and Standards promotional work and other non-official controls interventions	16
4	Resources	17
4.1	Financial Allocation	17
4.2	Staffing Allocation	17
4.3	Staff Development Plan	18
5	Quality Assessment	19
5.1	Quality assessment and internal monitoring	19
6	Review	20
6.1	Review against the Service Plan	20
6.2	Identification of any Variation from the Service Plan	20
6.3	Areas of Improvement	20

	Appendices	
A1	Organisational Structure	22
A2	Demands of the Feed and Food Service	23
A3	Interventions at Food and Feed establishments	24
A4	Control and investigation of outbreaks and food related infectious disease	29
A5	Review against the Recovery Plan .	30

1 SERVICE AIMS AND OBJECTIVES

1.1 Introduction

This Service Plan sets out how Bath and North East Somerset Council intends to provide an effective food safety service that meets the requirements of the Food Standards Agency (FSA) Framework Agreement. It covers the functions carried out by authorised officers of the Food Health and Safety Team in relation to food safety, and the Trading Standards Team in relation to food standards and animal feed stuffs. Activities are carried out under the provisions of the Food Safety Act 1990, the Food Safety and Hygiene (England) Regulations 2013 and relevant regulations made under the European Communities Act 1992 and or the European Union (Withdrawal) Act 2018

The plan states how the authority will deliver the FSAs Recovery Plan following the Coronavirus Pandemic

1.2 Aims and Objectives

Food Safety and Food Standards

We aim to ensure that all food and drink that is produced, stored, distributed, handled or consumed in Bath and North East Somerset is safe and is how it is described. This will be achieved by:

Checking compliance with food safety and standards legal requirements using:

- Programmed inspections, prioritising visits by potential risk to health
- Targeted interventions including alternative enforcement strategies for lower risk businesses
- Investigation of complaints from the public
- Investigation of notifiable infectious diseases, following up allegations of food business involvement and preventing secondary infections
- Taking food samples guided by local intelligence, and as part of national sampling initiatives in partnership with Public Health England

In addition, and where resources allow:

- Supporting Food Standards Agency and United Kingdom Health Security Agency national campaigns through promoting health protection messages via media channels
- Working in Primary Authority Partnerships with 3 business partners
- Provision of food hygiene training for food handlers
- Support new businesses in achieving compliance and good food hygiene ratings from the outset by providing a chargeable advice service

Animal Feedstuffs

We aim to ensure that safe animal feed is produced by businesses who comply with legal duties and do not pose a risk to animal or, ultimately, human health. This will be achieved by:

- Promoting animal health and welfare by the inspection of premises, auditing of records and the provision of advice and guidance.
- Monitoring hygiene at primary food producers
- Monitoring the manufacturing, mixing and use of animal feed stuffs

1.3 Links to Corporate Aims and Objectives

In 2020 Bath and North East Somerset Council published its new Strategy for 2020 to 2024. The Council has a Framework, known as “One, Two, Three”,

One – we have **one** purpose to **improve people’s lives**

Two – we have **two** core policies, **tackling climate change and ecological emergency** and **giving people a bigger say**

Three – to translate our purpose into commitments we have identified **three** principles. We want to **prepare for the future, deliver for local residents** and **focus on prevention**

This plan demonstrates how the Council aims to improve people’s lives by ensuring our food businesses are compliant with the food safety legislation and support the local economy and tourism that the Authority’s UNESCO World Heritage Site status brings.

2 BACKGROUND INFORMATION

2.1 Profile of Bath and North East Somerset

The Council covers approximately 500 square km stretching from Chew Valley Lake in the west to Bath and the Wiltshire border in the east. In 2021 the population of Bath and North East Somerset Council was estimated to be around 193,400 residents.

- Bath is the largest urban area in B&NES. The current population is estimated to be around 107,161
- Economic activity currently stands at 82.2%
- B&NES has an unemployment rate of just 3.3%, compared to the national average of 4.8%
- Local skills levels are high, with over 49% educated to degree level or higher.
- The majority of economic inactivity comes from the very high numbers of students in the authority
- Accessibility of work/transport issues remain a priority issue in B&NES

Bath and North East Somerset is diverse, with well-established manufacturing industries and newer commercial and industrial developments. The majority of food businesses fall within the catering and retail sectors. There are a small number of food manufacturers in the area providing a range of products such as milk, cheese, and ice cream.

All interventions with businesses and members of the community are carried out with regard to the Local Authority's commitment to equality of opportunity for local people as stated in the Equal Opportunities Policy.

2.2 Organisational Structure

There is a cabinet of councillors appointed by the Council. The cabinet is responsible for making all the executive decisions required at member level. These decisions may be made collectively or individually by the cabinet Councillors. Executive decisions are those that are concerned with implementing major policies agreed by the Council and setting new service policies. The Council also appoints a councillor to be the Leader of the Council. In the 2019 local elections the administration changed to a Liberal Democrat administration.

The cabinet comprises the leader and 9 cabinet members who oversee 7 Portfolios.

The food and feed roles are within the Safety and Standards area in the Building Control & Public Protection Service of the Place Management Directorate. Food safety controls are carried out by members of the Health Safety and Food Team, whilst food standards and feed remain a duty of the Trading Standards team. Appendix 1 shows the organisation of the teams currently responsible for the food safety, food standards and feed services. This service is part of the Planning and Licensing Portfolio, the Cabinet member for which is Tim Ball.

Officers in the Health Safety and Food Team deal with the full range of food related issues, including food safety, infectious disease investigation and food-related service requests. Officers in Trading Standards enforce the food standards and animal feed legislation.

Bath and North East Somerset Council is supported by the United Kingdom Health Security Agency which has been delegated the Proper Officer role by the Director of Public Health for receiving notifications of statutorily notifiable infectious diseases. We also have good working relationships with the UKHSA laboratory at Porton Down, Wiltshire, PASS Scientific Services laboratories, and the West of England Food Liaison Group (WoEFLG) comprising our 5 neighbouring local unitary authorities.

2.3 Scope of the Service

Health Safety and Food Team of Safety and Standards

- Ensures the registration of food business establishments, with regard to any guidance on certain types of business.
- Ensures that the premises database is monitored to identify where businesses have incorrectly registered in the past or registration is no longer appropriate.
- Carries out all official controls functions relating to food safety and low risk food standards matters e.g. interventions, inspections, audits, sampling at food establishments. Programmed visits are carried out according to risk priority in accordance with the inspection frequencies outlined in the Food Law Code of Practice. Premises currently rated A-C and newly registered/unrated businesses are given priority.

- Where appropriate, food businesses are given a food hygiene rating according to compliance standards found during an unannounced visit. Businesses are provided with the appropriate rating sticker and advice on how to improve if necessary. Their ratings are uploaded to the FSA's national ratings website
- Low risk food businesses (E-rated) are largely monitored through the use of alternative enforcement self-assessment and telephone questionnaires. The responses are monitored and where activity suggests a higher risk than was assessed at the previous intervention, then follow up inspections are carried out by an authorised officer. From April 2023, we aim to focus on a process of re-inspection of all E rated premises to ensure that standards are being maintained. This will also enable us to devise a new alternative enforcement strategy for the future and consider the new hygiene delivery model currently being tabled by the Food Standards Agency.
- Low risk standards assessments are carried out by Food Safety officers as part of their routine inspections. However high risk and complex food standards interventions and complaints are carried out by authorised Trading Standards officers. Food Safety officers will routinely refer concerns found during routine inspections to Trading Standards colleagues.
- The Team offer "New Business Start Up" packages to new businesses and provides tailored "paid for advice" to food business operators including help with implementing the Food Standards Agency's Safer Food, Better Business or other food safety management systems
- Reviewing applications for events taking place in the local area, and advising on food safety matters as part of the authority's Safety Advisory Group for Events.
- Undertaking site visits to events where deemed necessary, and inspecting food businesses operating at events. Issues will be followed up with the business' registering/home authority as needed.
- The authority currently has 3 Primary Authority Partnerships.
- Identifying and assess premises that require approval for specific food products and ensures that they are issued with conditional and full approval as necessary.
- Investigating complaints concerning food, food establishments and food handling practices
- Investigating cases of suspected and confirmed statutorily notifiable food related infections. Follow up any allegations of links with food businesses and ensure that infected food handlers do not cause secondary infections
- Offers RSPH food nutrition and allergen training courses when resources allow this.
- The Food officers carry out gas safety checks and hazard spotting in all food businesses, and refer more complex issues to the Health and Safety Specialist Officer
- The team is also charged with gathering intelligence for Private Sector Housing Enforcement and reporting criminal intelligence to multi-disciplinary project teams

Food Standards

- Carrying out all official controls functions relating to food standards matters e.g. interventions, inspections, audits, and sampling at food establishments. Programmed visits are carried out according to risk priority with those rated A and B for food standards and newly registered businesses being given priority

- The Team offer “Business Health Checks” to new businesses and provide a tailored “paid for advice” service to food business operators to help them comply with Trading Standards legislation including composition and labelling
- The authority currently has 3 Primary Authority Partnerships
- Investigating complaints concerning food standards, labelling and allergens

Feed Service

- Ensuring the production of safe feeding stuffs, thus protecting animal welfare and ultimately the human food chain
- Assisting in the investigation and control of any alerts relating to feed stuffs
- Undertaking intelligence-led feed sampling

2.4 Demands on the Service

The Council’s food safety and standards service is delivered by the Safety and Standards, - Health, Safety and Food Team and Trading Standards Team based at the Civic Centre in Keynsham.

The Council’s general contact number is **01225 477000**

Generic team email inbox: Public_protection@bathnes.gov.uk

Over the last two years, during the pandemic, officers have been working mainly from home. Currently officers are working from home when not undertaking visits, but are also able to hot desk in Lewis House and the Guildhall in Bath, at the recently refurbished Civic Centre in Keynsham and the Hollies in Midsomer Norton.

In accordance with corporate policy, the team operate hot desking and remote / home working procedures.

Office opening hours for all Council buildings are:

- Mon-Thurs 08:30-17:00
- Friday 08:30-16:30

Bath and North East Somerset Council does not have a formalised Emergency Out of Hours service, but emergencies outside of normal office hours are referred to the Team Manager. Contact via 01225 477000

Appendix 2 provides details of

- Establishment profile
- Number of Approved establishments
- Service Requests
- Other events that may impact on the service, for example the Christmas market



2.5 Regulation Policy

The Teams adopt the principles laid down in the Enforcement Concordat which states that enforcement must be fair, consistent and equitable. The Enforcement Policy outlines the enforcement options available for dealing with problems relating to non-compliance with the legislation. This Policy was reviewed and updated in 2016/17. In BANES non-complaint businesses who struggle to improve and maintain standards are offered a range of Businesses Support, to help them improve for example, where appropriate, the team will work with the FBO to prioritise and implement improvements rather than seeking immediate enforcement action.

3 SERVICE DELIVERY

3.1 Interventions at Food and Feed establishments

Food Enforcement

Authorised officers undertake the full range of official control intervention options based on risk. In the majority of cases contraventions are minor and the food business operator is informally requested to carry out certain actions to comply with the law. However, during the course of delivering the food safety / standards service, officers may need to resort to formal action in some circumstances or may accept voluntary officers for surrender or closure.

Premises Food Hygiene Ratings

Food premises are risk rated for Hygiene and Standards using the Food Law Code of Practice scoring system and this in turn calculates the Food Hygiene Rating for relevant businesses, from zero to the maximum 5. Premises are provided the appropriate rating sticker by post if they are rated '3' (Generally Satisfactory) or above, and ratings are uploaded to the Food Hygiene Rating Scheme portal every 2 weeks. Queries, appeals against ratings and Right to Reply requests are considered by the Team Manager as Lead Food Officer. There is no ability for the Team to charge for these initial inspections. Requests for re-rating visits are required to be made in accordance with the FSA's Brand Standard; the re-scoring visit may be undertaken by the same officer as the initial inspection. A charge is made to any Food Business Operator who wishes to apply for the re-rating after the 3-month minimum stand-still period. Initial inspections of businesses who have received 'New Business Start Up' advice will be undertaken by another officer who has not been previously been involved with the business, or by the advising officer with an accompanying colleague.

Feed

The Animal Feed (Hygiene, Sampling etc. and Enforcement) (England) Regulations 2015 consolidated the existing legislation relating to the enforcement of controls on the manufacture and processing of animal feeding stuffs and imposed additional controls on these establishments and also on primary producers, farms and other premises where feed is stored and on hauliers who transport feed. The legislation brought in a requirement that these establishments implement control systems based on Hazard Analysis and Critical Control Point principles.

Food Safety Inspection Programme

Public Protection's food premises database is maintained on a computer software package named "IDOX UNiform". The number of programmed food hygiene inspections due in 2022/23 are shown in Appendix 3

Premises are rated between A - E in line with the latest revision of the Food Law Code of Practice (currently .

- 'A' rated premises should be visited every 6 months,
- 'B' rated every year,

- 'C' every 18 months
- 'D' every 2 years.
- 'E' rated premises are subject to an Alternative Enforcement Strategy.

During the Coronavirus pandemic, there has been significant disruption to the inspection programme. The team are committed to delivering the targets set out in the FSA's Recovery Plan. However, it must be noted that there was a backlog of inspections pre-pandemic, which the Council was addressing as part of the 2019 Action Plan. Officers are expected to achieve 100% of all A-C rated premises interventions; 100% of the non-compliant D rated premises; all approved premises inspections and all new businesses registrations. In addition we aim to visit and inspect all broadly compliant D's by the end of March 2024. The Alternative Enforcement Strategy (AES) is currently being reviewed in order to reinstate E rated premises into the inspection regime following on from the Pandemic. This AES will include a number of interventions used to address these businesses, from through the door inspections, telephone questionnaires and targeted training offers on specific issues such as allergens, and is likely to sector as well as risk specific. The aim is to carry out a through the door inspection of all E rated premises by the 31st March 2025.

Our current policy is for all new premises registering to be inspected by an officer. There is still a small backlog of New Registrations that were received during the Pandemic that require inspecting, but it is our intention to inspect all of these premises by 31 December 2023.

Inspection targets have been re-established to assist officers to plan their work, and assist managers with performance management.

If access has to be arranged to a business in advance (e.g. home caterers) and the Food Business Operator does not respond to requests for contact, checks will be made to see if the business is still operating. If this is not confirmed, a final notification will be sent to the Food Business Operator's address asking them to contact the food team to update their details. If no further response is received then the business will be closed on the database.

Food Standards Inspection Programme

This year the Food Standards risk rating system is undergoing a major overhaul nationwide, and assessment of risk will be based on local intelligence as well as the type and size of business.

Any new food premises registrations are desktop risked initially to establish when a visit by Trading Standards is required. Where possible and appropriate, visits are conducted jointly with the Food Safety team to reduce the burden on businesses.

However; the authority is still waiting for our IT provider, IDOX, to carry out the modifications to the system to allow the registered food businesses to be risk rated against this new matrix. Until these changes are made, the food business premises will continue to be inspected based on the existing risk rated system. Currently businesses are rated as either High, medium or low risk:

- High risk are visited every 12 months by the Trading Standards Team. We usually have around 15 – 20 visits each year.
- Medium risk visits are targeted towards different sectors each year such as butchers, deli's and CBD retailers and are undertaken by the Trading Standards team. We usually have 75 – 90 visits due each year.
- Low risk premises are assessed by the Food Safety Team during their inspections and any requiring follow up work are referred to the Trading Standards team for action .

Feed Inspection Programme

Funding is provided nationally for the feed visits and the number of visits undertaken by the Local Authority, is dependant on the total number of premises in each of the following sectors:- livestock farms, arable farms, manufacturers (including home-based small pet food manufacturers), distributors and hauliers. Food hygiene at primary production visits are also conducted under this funding. All premises are risk rated in a similar way to the food premises and visits are undertaken by the Trading Standards Team. We usually have around 15-20 visits due each year.

See Appendix 3 for food and feed interventions programmed for 2023/24

3.2 Feed and Food Complaints

The investigation of customers' service requests regarding food and feed safety is an important, significant and growing area of work for the teams. However, due to a reduction in resources, officer workloads have had to be prioritised and discretionary, non-statutory work has been reduced.

3.3 Primary Authority Scheme

Businesses or trade associations can form a Primary Authority Partnership with a local authority to assist with consistent enforcement. The guidance and advice the local authority provides must be taken into consideration by officers nationwide carrying out inspections and dealing with instances of non-compliance.

Bath and North East Somerset Council currently has 3 formal Primary Authority Partnerships which are shown in the table below:

Company	Type Of Partnership	Estimate of Time / Year
Super Nutrients	Food safety and standards	1 day a month
Buckley and Beale	Food standards	2 days per year
Josh Eggleston	Food safety and standards Health and Safety	New Partnership; approximately 7 days work required to review and assess documentation.

3.4 Advice to Businesses

Bath and North East Somerset Council recognises that advice and support for food businesses is constantly reviewed to ensure that the authority is able to deliver our official controls. Businesses are encouraged to “self serve” and are directed to our business advice on the Bath and North East Somerset website. However the Council also offers a paid for advisory service. Although not widely promoted, there had been a steady increase in the uptake of this service pre-pandemic, and demand for this service is expected to increase.

Most requests for advice for new businesses hygiene advice are now responded to by means of a standard email providing signposting information including links to gov.uk for registration, and to www.food.gov.uk for compliance advice. These emails are sent by our admin support staff.

A high number of businesses are provided advice by the Trading Standards Team for food standards issues. Approximately 45% of all business requests for advice Trading Standards receive are for food issues. The recent change in allergen labelling led to confusion for businesses and specific tailored advice is provided depending on business need.

Many other advice requests are about the Nutrition and Health Claims legislation as more and more businesses offer “healthy” food. Businesses are encouraged to self-serve and signposted to the Food Standards Agency advice pages and the Business Companion website, which is the national website for Trading Standards guidance. A paid for advisory service is also offered where extremely detailed advice is required and we have at least one business that regularly uses this service.

Very few requests are received for feed business advice as we do not have many manufacturers in our area. We do proactively advise relevant businesses to ensure they register with the Council as this is a legal requirement.

3.5 Feed and Food Sampling

a) Food Sampling

i) Microbiological

Microbiological food examinations are undertaken by the UKHSA’s Food, Water & Environment laboratory at Porton Down, Wiltshire. The laboratory also co-ordinates the regional sampling programme. The plan is developed to incorporate priorities identified by UKHSA, the Food Standards Agency and also responds to requests based on local intelligence.

The microbiological food sampling programme is implemented each year which responds to specific local and national demands. The sampling programme is overseen by one of the Specialist Officers who also represents the authority on the UKHSA laboratory regional liaison group.

ii) Food Standards

Sampling work for the Service for Food Standards falls into two categories:

- programmed
- reactive samples taken in response to a complaint

A food standards sampling programme is planned each year responding to local and national issues that have emerged, for example Undeclared allergens – sampling at catering and/or retail establishments during routing visits.

Food Safety Complaint samples are taken by the Trading Standards team when food standards complaints have been received, where appropriate, e.g. allergens continues to be priority area of work and samples may be procured as part of an investigation

Trading Standards have contracted Eurofins in Wolverhampton to act as our Public Analyst.

b) Feed

No feed samples have been taken in recent years and none are planned for this year. However, an on-going, pet food issue may require samples to be taken to ensure the business is complying with its legal requirements as to the safety of the pet food.

3.6 Control and Investigation of Outbreaks and Food-Related Infectious Disease

The Health Safety and Food Team investigate food-related notifiable infectious diseases, in accordance with Standard Operating Procedures agreed between UKHSA's South West Health Protection Team and Environmental Health departments across Avon, Gloucestershire and Wiltshire.

Cases of infection are notified to the Team by UKHSA in their role of Proper Officer as delegated by Bath and North East Somerset Council's Director of Public Health and Team Manager Safety and Standards. The response to notifications of illness depends on whether it is a single case or an outbreak. Patients suffering from all relevant infections are notified of their positive status by telephone during which a UKHSA standard trawling questionnaire is completed in an attempt to identify the source of infection. If the patient is unavailable to complete this, they may be sent a link to the secure online version of this questionnaire. Otherwise, they are notified by letter and provided with a paper copy of the questionnaire to complete and return by post. Advice is also given to reduce the chance of secondary infections – cases are advised to speak to their GP however if they have any clinical concerns. The exception to this is *Campylobacter* cases, - a questionnaire not undertaken in the first instance, and instead the affected person is sent a letter containing advice about infection control. The case is advised to contact the food safety team to discuss the case if they are part of a high risk group or are aware of the likely source of their infection. This is in line with national UKHSA guidance.

Investigation of outbreaks will be carried out in accordance with the Bath and North East Somerset Communicable Disease Incident and Outbreak Control Plan, agreed in partnership between Bath and North East Somerset Council's Public Health, Environmental Health and Emergency Planning teams and with UKHSA South West, NHS South West. The Communicable Disease Incident and Outbreak Control framework document, was reviewed in 2022.

The Team contributes to the Bath and North East Somerset Health Protection Assurance Group, providing assurance to the Director of Public Health about health protection measures, safeguards and incident management within the district. One of the roles of this Group is to identify any risks in the district that could cause health protection issues.

The Team Manager represents Bath and North East Somerset Council at a quarterly liaison meeting between UKHSA South West and the regional Environmental Health departments.

3.7 Feed / Food Safety Incidents

Food and Feed Alerts are issued by the Food Standards Agency to relay information on national food issues to local authorities, the majority being "For information only". "Food Alerts for Action" require officers to undertake a variety of courses of action dependent upon the issue. This may include telephoning, visiting or mailshotting food businesses to give advice and ensure products are removed from the market. Formal procedures such as seizure and applying to Magistrates for a destruction order for food can be implemented where necessary, though this is unusual.

Changes in FSA procedures mean that the majority of Food Alerts are now "For Information", only with withdrawals largely being dealt with directly by manufacturers or retailers. The estimated resource requirement is hence very low except that officers receiving notifications ensure each team member is aware of the nature of the Alert.

However, a significant amount of officer time can be taken up with product recalls when these relate to manufacturers or importers based within the local authority area. In 2022/23 officers spent significant amounts of time dealing with product recalls related to contamination relating to a product imported and distributed by one of our local businesses.

Trading Standards will continue to respond in accordance with the Food Law Code of Practice (England) to identify and report food hazards and respond to Food Alerts issued by the Food Standards Agency.

Feed Alert/ Incidents are covered by a formal procedure which ensures standardised responses to any action needed to be taken as a result of these notifications.

Estimate of resources required: A nominal figure of 0.10 FTE may be appropriate as this is dependent on responding to local incidents .

3.8 Liaison with other Organisations

There are a number of stakeholders involved in the operation of the Council's food and feedstuffs safety and hygiene services including:

- UKHSA specifically:
 - UKHSA South West
 - UKHSA / EH South West Liaison Group
- The West of England Food Liaison Group (WoEFLG)
- South West Food Leads Coordination Group
- Trading Standards South West (TSSW)
- UKHSA Porton Down Lab Users Group
- The Food Standards Agency
- Bath and North East Somerset Council Health Protection Board

Estimate of resources required: 0.1FTE

3.9 Feed and Food Safety and Standards Promotional Work and Other Non-Official Controls Interventions

In recent years with the reduction of resources, food safety promotional work and other discretionary, non-statutory functions has greatly decreased and other ways of delivering information have been utilised, including: working with the Council Communications team to find efficient ways of promoting FSA campaign messages for using Bath and North East Somerset Council social media channels. Evaluation by the Communications Team shows that these messages reach large numbers of people. We intend to do this again in 2023/24

In 2022/23 the home based producers toolkit was sent out to new businesses in this sector as well as existing businesses. This toolkit covered both food hygiene and food standards advice for business that now manufacture food products at home – a sector that has risen enormously since the pandemic.

Estimate of resources required: 0.1FTE

4 RESOURCES

4.1 Financial allocation

Food Safety and Standards Budget

In recent years the Food Safety and Trading Standards budgets have remained fairly constant with some additional funding in 2021/22 to support the Council's Action Plan to deal with the number of overdue food inspections

See below for a comparison of team budgets from years 2019 to 2024

Year	Food Safety Team Budget £	Trading Standards Team budget £	Total FTE	Food Officers FTE	Food Admin FTE	Total budget allocated to LEAMS work £	comments
2019/20	385858	358789	15.8	6.25	1.0	341689	
2020/21	407861	349198	15.5	6.5	1.0	366319	Additional resources were also added in year funded from COMF to deal with COVID This was in addition to the budget allocated here
2021/22	401273	350327	15.9	7.3	1.0	392345	
2022/23	416821	345340	17.1	8.4	1.0	418966	
2023/24	446036	345018	15.9	6.95	1.0	434201	
Note:							
The Food Safety and Standards budget is based on a percentage of the FHS team budget using the LAEMS FTE and team FTE figures.							
The team budget excludes scientific services budget for food standards and foreign body sampling							

4.2 Staffing Allocation

A structure chart and a table of the allocation of FTE for official controls for 2023/2024 is available in Appendix 1.

Appendix 3 sets out the work programme for 2023/24 in terms of inspections due. The number of posts required to effectively deliver the food service is considered below in section 6.3.

In 2023/24, an additional food officer will be employed, to carry out food safety interventions due to a fall in standards during the Pandemic which mean that inspections take longer and are required on a more frequent basis .

Feed enforcement is carried out by the Trading Standards Team. This work is undertaken by 0.5 FTE Specialist Trading Standards Officer supported by the Animal

Health Officers (1.0 FTE). Each officer is expected to commit 10% of their time to feed enforcement.

Total allocation of officer to feed enforcement is 0.3 FTE.

4.3 Staff Development Plan

Feed and Food officers are required corporately to have regular 1-2-1s carried out approximately every 4-6 weeks, as well as quarterly “conversation” recorded on the authority’s performance review system – Clear Review .

Food and Feed officers

To comply with the requirements of the Food Standards Agency’s Food and Feed Law Code of Practice, officers must demonstrate ongoing competency if they are to be authorised to carry out the full range of law enforcement activities. All Authorised Officers must undertake at least 20 hours of food-related CPD per year, with at least 10 being core food related training, and for Feed officers carry out 10 hrs of feed related CPD per year. This is made up of either paid courses, training provided free by the FSA or other organisations, or internal cascade training on specialist areas provided by other team members. Internal CPD certificates for these can be issued as needed, with regard to the Chartered Institute of Environmental Health’s CPD regulations.

In May 2019, B&NES centralised all training budgets. During the pandemic most of the training undertaken by officers has been via online webinars. Whilst this does assist in satisfying a proportion of the Core Food training requirement, there is still a need for occasional Food and Feed related training courses provided by independent organisations but it is usually found these are located some distance away so officers attending have to stay overnight or travel which in addition to the course prices makes them unattractive.

The Feed provision will be provided by the one qualified officer within the Trading Standards team with support from the Animal Health officer.

CPD is recorded in a team training matrix to enable the Team Leader to monitor compliance with the competency requirement.

A review of staff competency will be undertaken to map out the team against the Code of practice.

5 QUALITY ASSESSMENT

5.1 Quality Assessment and Internal Monitoring

The services are required to monitor and report on their performance. A corporate Performance Dashboard is completed quarterly to inform the Head of Building Control and Public Protection on the performance for that quarter, and to highlight any exceptions in performance that might require appropriate corrective action.

Quantitative assessment of outputs is measured by interrogation of the Uniform data base, where officers record details of all visits and interventions. This data is currently submitted to the Food Standards Agency via routine 'Temperature check' surveys which have replaced the previous LAEMs system for data submission.. In relation to Feed reported on a quarterly basic to the regional coordinator for TSSW who oversee the FSA Feed program for the South West of England.

A qualitative assessment will be monitored by the Team Manager or Specialist Officer by selection of random intervention records to examine in detail. The Team Manager will also periodically arrange for peer inspections for each officer. Team members are encouraged to assist each other when dealing with difficult or contentious cases except in the case of Food Hygiene Rating Appeals or similar which are dealt with by the Team Manager.

In 2023 /24 the Team Manager will complete the review of all the internal policies and procedures.

6 REVIEW

6.1 Review against the Service Plan

A review of this Plan and work plans for both the Health Safety and Food Team and Trading Standards, food / feed service are to be undertaken annually. Details of the teams' performance against the targets set in each annual work plan can be found at Appendix 5.

6.2 Identification of any variation from the Service Plan

Where any deviation from the plan is identified, the Team Manager will arrange for the appropriate corrective action to be taken to address the situation. This could include:

- re-deploying resources from other areas of work which are assessed as being of lower risk or priority
- recognising that the target or objective is being achieved through other, but equally effective, means of service delivery
- obtaining additional resources to achieve the target by procurement from other competent service providers

6.3 Areas of Improvement for 2023/24 (*addressing the resource gap*)

Although there is no official ratio of recommend FTE per number of food businesses, a rule of thumb quoted figure is 1 FTE (front line) : 500 food businesses. Our current inspector to premises ratio is 1:425, based on 4.7 FTE and approximately 2000 food establishments.

Whilst we currently have 5.7 FTE Food officers on the establishment, the 4.7 FTE food officers reflects the amount of time allocated for official controls. The officers also undertake other duties such as infectious disease investigations, and health and safety checks which are not included in the FSA audit. Incidents in these other areas can have a significant impact on service delivery.

In 2023/24 a review of posts was undertaken and changes made to delete the 0.8 FTE Specialist officer post that had been vacant since April 2022 and the 1 FTE Public Protection Technical Officer post and replace these with 2 FTE Officer / Senior Officer posts

This additional resource will help enable us to tackle the backlog of overdue food inspections.

Risk

There is a risk is that due to unforeseen emergencies the allocated resource may not be enough to deliver the required inspection levels. Therefore we will be closely monitoring and reviewing performance during 2023/24 to ensure that senior managers and the Cabinet member are made aware of any issues that arise.

Additional resource actions

The team have been provided with tablets and use electronic forms to improve our remote working opportunities. We use iAuditor to record inspections electronically.

We are also in regular dialogue with our neighbouring local authorities to identify and share best practice, experience and resources where practicable.

Particular areas of improvement for 2023/24 include:

1. Aim to comply with the Food Standard Agency's Food Delivery Plan
2. To eliminate backlog of overdue food inspections for new premises by December 2023
3. To ensure that all D rated premises are inspected by the end of March 2024.
4. To carry out interventions at E rated premises which may include; through the door inspection , telephone or mail questionnaires and the provision of training courses for the FBO and staff in relation to allergens and Safer Food Better Business .
5. Ensure all Authorised Officers comply with the FSA's competency requirements including CPD attainment for food safety
6. To investigate single cases of infectious diseases such as food poisoning and assist UKHSA SWHPT in the investigation of larger outbreaks here required
7. Monitoring the FSA's development of ABC, keep team members and managers abreast of developments and create a plan for any changes implicated.
8. Participate in UKHSA and FSA national campaigns where possible

Signed by:



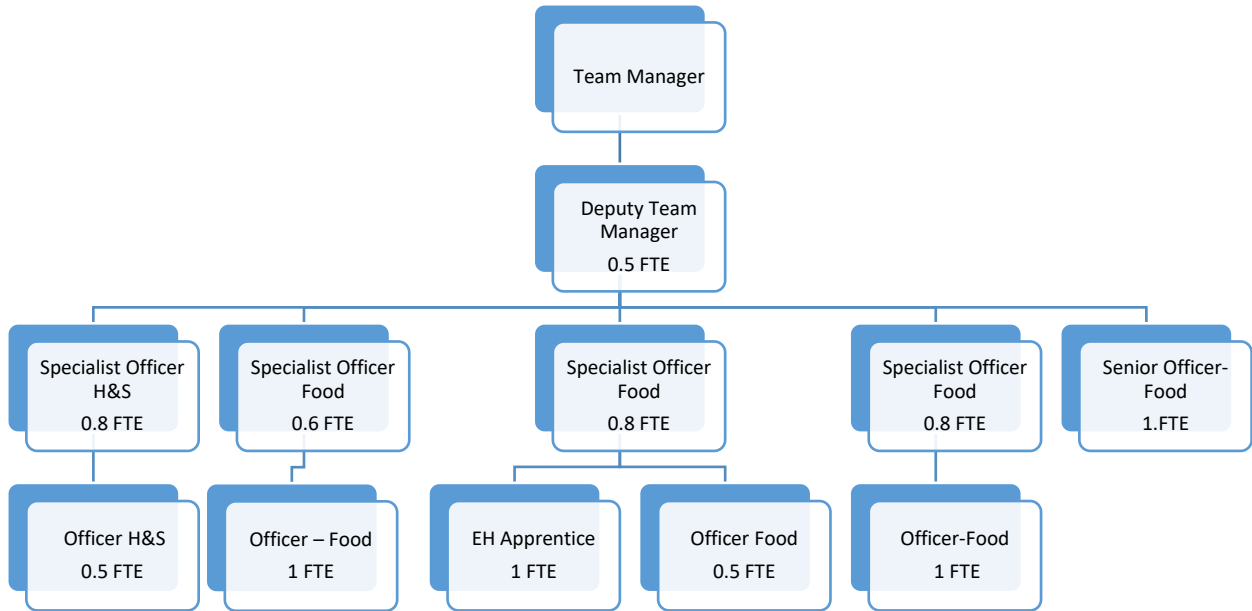
Suzanne McCutcheon Team Manager Safety and Standards



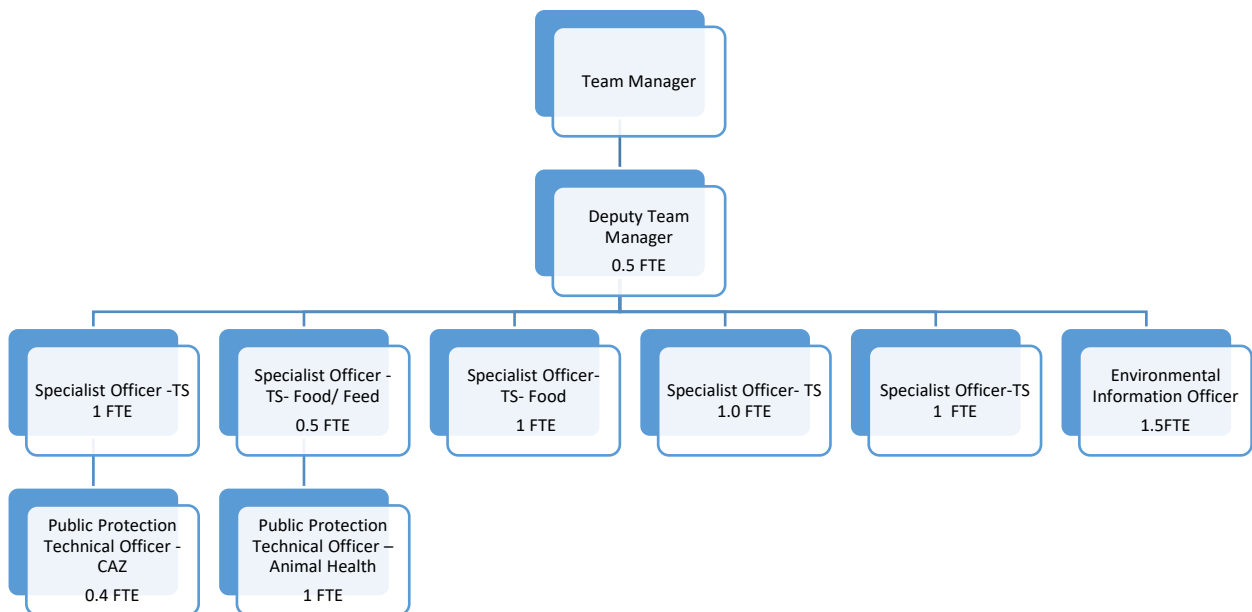
Cllr Tim Ball Cabinet Member for Planning and Licensing

Organisational Structure

Health Safety and Food Team



Trading Standards Team



Demands on the Feed and Food Service

Approved Premises

Total number of Approved Premises	Nature of Business
8	Dairy producer: 5 Cold store: 2 Meat Products 1

Food Hygiene

Risk Category	April 23
A	4
B	115
C-Broadly Compliant	367
C-Less Than Broadly Compliant	33
D-Broadly Compliant	554
D-Less than Broadly Compliant	4
E	770
Unrated	125
OUTSIDE THE PROGRAMME	0
TOTAL	1972

Food Standards

Risk rating	Total number of inspections completed between 1 April 2022 and 31 March 2023	Total number of premises
High	33	10 (some premises have been re-risked and moved to medium risk as part of the FSA recovery plan)
Medium	148	602
Low	0	1614

Feed Stuffs Premises Profile

Premises type	Number
Compound feed manufacturer	1
Pet food manufacturer	5
Surplus food supplier	17
Transporters	3
Co-product producers	4
Mixers	9
Distributor	1
Livestock Farms	463
Arable Farms	6

Food Hygiene Service Requests

Service request type	Number			
	19/20	20/21	21/22	22/23
Allergy advice	11	3	11	8
Consultation on licensing application	1	1	0	1
Covid-19	22	321	43	0
Extraneous matter (foreign body)	21	22	15	19
Food alerts	3	4	1	3
Food hygiene rating activity	41	20	35	39
Food related illness	111	59	77	91
Freedom of Information Act	10	2	1	3
Health Promotion Education	2	0	0	0
Hygiene	45	29	35	24
Hygiene - handling procedures	44	30	28	35
Hygiene - other	21	18	11	29
Hygiene - temperature requirements	2	1	2	0
Hygiene Advice	87	61	65	76
Hygiene-conditions of premises/equipment	59	21	53	28
Land Charge (Food Team)	24	24	26	24
Miscellaneous Food Complaint	11	7	4	4
New premises advice	30	71	59	33
Odour/Fumes	0	0	0	3
Out of condition	6	3	9	2
Out of date	2	0	6	3
Planning Application List	4	0	2	0
Primary Authority activity	30	15	4	0
Registration	10	18	26	11
Safer Food Better Business advice	24	5	3	25
Sampling	1	0	2	1
Smoke Free enquiry	2	1	1	0
Special Events	4	2	2	87
TOTAL	628	738	521	549

Other local factors that Impact on Service Delivery

There are five hospitals in the area, four of which come under the responsibility of local NHS Healthcare Trusts and one which is privately run. Each of these hospitals are regarded as High Risk food premises; a consequence of their vulnerable clients and the catering methods employed.

In a normal year a range of events are held throughout which features a large number and variety of mobile caterers - majority of which originate from outside the authority. Remote checks are carried out on the listed caterers for each event, which are notified to us by the Events team's EventApp software. These including checking caterers are registered and if they have been inspected by their home authority, and what Food Hygiene Rating they have. Visits to an event may be undertaken and can include inspections of caterers, and lower risk food retail stalls as necessary. Issues found may be followed up and referred back to the business' home authority.

The Bath Christmas Market is normally the largest event of the year in the authority. Visits will be carried out by the Food Safety and Trading Standards officers as well as other teams forming part of the Safety Advisory Group for Events (e.g. Licensing).

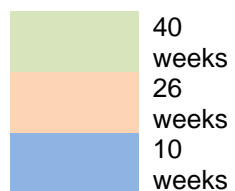
Food Standards Sampling

3 samples were taken in 2022/23.

In 2022/23 samples were planned for undeclared allergens in takeaway meals as well as imported sweets and chocolates for compliance with UK compliant additives. However, due to resource issues these samples could not be taken.

Food Hygiene Inspection Capacity by Officer

	A	B	C	D	E	F	G	H			
Number of working days /week	4	4	3	5	3	5	5	4			
Training Day						1	1				
Duty day	1	1	1	1	1	0.5	0.5				
Days available for inspections	3	3	2	4	2	3.5	3.5	3			
inspections per week	3	3	2	3	2	6	6	5			
Uniform				1							
Number per year	100	100	52	100	80	200	200	50			
Inspections per month	8	8	4	8	7	17	17				
total number of inspections	252			100	480			50	882	TOTAL	



Food Hygiene Inspection Plan 2023/24

2023/24

Risk Rating	Total due before 31 March 2024	Allocated to Specialist	Allocated to Senior	Allocated to Officer	Allocated to Apprentice	Total	Carry over to 2024/25
A	4	4				4	0
B	115	90	25			115	0
C	216	7	33	176		216	0
D	121			121		121	0
E	756		2	1	50	53	703
New/unrated expected to register in year	250	90	18	142		250	0
Overdue - New /unrated	125	55	20	40		115	0
Approved Premises	8	6	2			8	0
TOTAL	1462	252	100	480	50	882	703

Control and Investigation of outbreaks and food related infectious disease

Disease type	Number			
	19/20	20/21	21/22	22/23
Campylobacter	176	158	196	165
Cryptosporidium	27	8	17	14
Cyclospora	0	0	0	1
Dysentery Bacillary (Shigella)	3	0	4	1
E.COLI 0157	0	5	1	4
Escherichia coli Enteritis	0	0	1	0
Gastroenteritis Virus & Unknown Aetiology*	0	1	0	1
Giardia	29	11	12	13
Hepatitis	2	0	0	0
Listeriosis	1	0	0	1
Salmonella	23	12	19	29
Total	261	195	250	229

* This total refers to suspected food poisoning notified by UKHSA, and does not include consumer complaints of alleged food poisoning from a business.

Performance against the Recovery Plan 2022/23

Risk Rating	Total number of premises on 31 March 2022	Total Number of Hygiene Inspections required by Recovery Plan 1 April 2022- 31 March 2023	Actual Number of Inspections completed
Approved Premises		8	8
A	1	2	4
B	41	41	41
C broadly compliant	387	387	383
C less than broadly compliant	14	14	14
D broadly compliant	514	0	
D less than broadly compliant	4	4	
E	864	0	
New/unrated	241	241	
<i>Expected number of new registrations due in year</i>		300	
TOTAL	2066	977	