

Food Service Plan 2019/20

Foreword

Salford City Council consistently recognises the importance that the provision of an effective Environmental Health and Trading Standards service plays in ensuring the health, safety and wellbeing of those who live, work and visit the city of Salford.

This Food and Feed Service Plans provide a clear strategy and ensures that resources are targeted towards front line services and high risk activities. It provides the basis for a robust regime to monitor improvements in the performance of service in the long term as well as reactive interventions in the short term.

These plan sets out the standard of performance that must be achieved by the Place Directorate in order to maintain high quality health protection. The work of the service is to successfully balance service delivery between education, encouragement and enforcement.

Assisting business to comply with food safety and feed standards is as important as detecting non-compliance. The council works in partnership with the food and feed industries and service providers in this crucial area of public health protection as in the past, this approach has been a success.

However, we are committed to use all our available powers to secure the standards of food safety expected by our communities and have provided up to date information on all of Salford's food premises which have been inspected by the service via Salford's food hygiene ratings [web pages](#). Regulatory Delivery (RD) coordinates enforcement activity across all regulatory activities. These Food and Feed Service Plans will ensure we meet the RD's requirements through strengthened partnership work, improved intervention outcomes and reducing unnecessary red tape for businesses. This is demonstrated by some of the work which Salford is currently undertaking through our Primary Authority partnerships and the Centre of Excellence.

It is also pleasing that stakeholders value the council's Environmental Health and Trading Standards services so highly and I am keen that both members and officers continue to respond by providing services that delivers best value. Food and Feed Safety are key service priorities in Salford. The city council will work to deliver the high standard expected by our community.

Councillor David Lancaster
Lead Member- Environment and Community Safety

Introduction

Food and feed safety are a topic of vital importance and continual scrutiny for the city council, regionally and nationally. The right of access to safe and wholesome food is essential to all our residents and those who work and visit the city.

The residents of the city expect no less from the authority. In surveys undertaken by Environment and Community Safety, regular inspections of businesses to maintain food safety standards were considered by residents to be a very important service.

Against this background, the council has responded to the recent changes to national legislation and food and feed standards by ensuring that sufficient staff resources of the right type and quality continue to be provided. This has ensured that not only has the statutory duty of the council been met, but that the objectives of a safe food and feed supply for the population we serve are, as far as is practical for the council, achieved.

The Food Standards Agency's strategy for 2015/2020 "food we can trust", is aimed at finding new ways of effectively putting the consumer first and being even more effective in applying evidence to work out what is in consumers' best interests. This strategy is welcomed by the council as means to ensure our services are reviewed to effectively regulate risk, provide information to consumers to support their rights to make safe food choices and to support competent businesses to thrive.

**Ben Dolan, Strategic Director
Place Directorate**

1.0 Service aims and objectives

To ensure that all food and drink intended for supply for human consumption which is produced, stored, distributed, handled or consumed in Salford, is safe, hygienic and compliant with food hygiene and food standards legislation and that all food premises and food handlers comply with the Food Hygiene Regulations.

This will be achieved through developing management confidence in those who operate food businesses and a mixture of education, programmed inspections, the investigation of complaints and sampling enforcement initiatives.

1.1 Link to corporate objectives and plan

This document is an expansion of the general objectives regarding food, contained in the Environment and Community Safety directorate business plan, which enables the directorate to deliver the council's priorities.

2.0 Background

2.1 Organisational structure

Environmental Health and Trading Standards functions are an integral part of the directorate's Regulatory Services. Enforcement of food hygiene legislation is undertaken by the Environmental Health team (EH) and food standards by both the Trading Standards team for high risk premises and the EH team for lower risk premises. Each team is headed by a Lead Practitioner who are directly responsible to the Head of Regulatory Services.

The team of specialist food officers are based at Civic Centre Chorley Road Swinton M27 5AW. The office is open from 8.30am to 4.30pm Monday to Friday.

Officers are assisted in their tasks by the Public Health England Laboratory at York which provides the Food Examiner Service. Public Analyst, Agricultural Analyst and Scientific Adviser services are provided by Lancashire County Council in Preston.

The team work closely with the other nine Greater Manchester Authorities through the Greater Manchester Public Protection Partnership's Food Liaison Group to benchmark our services, share intelligence and act consistently.

2.3 Scope of the Food Service

The Environmental Health team is responsible for the enforcement of the Food Hygiene (England) Regulations 2013 and the food hygiene legislation made there under. Officers of the Environmental Health team also carry out health and safety, smoking and licensing compliance inspections in a range of food premises. This is delivered alongside food service inspections.

The Trading Standards team is responsible for food standards and feeding stuffs enforcement under the Food Safety Act 1990 and Regulation (EC) No 882/2004.

Regulatory Services operates a Pest Control service which food businesses may contract with in order to assist them in maintaining pest free premises.

Officers in the Environmental Health Team investigate notifications of infectious disease including food poisoning and community outbreaks, in association with the Greater Manchester Public Health England Unit and the Consultant in Communicable Disease Control.

2.4 Demands on the food service

At present there are approximately 2118 food premises operating in Salford, including ten approved premises that manufacture food in accordance with Regulation (EC) No 853/2004 including an industrial dairy, meat and fish processing establishments, and over a thousand catering premises. The majority of premises are small to medium size companies with limited internal technical support.

Complaints and requests for service account for a large proportion of the work undertaken by the Trading Standards team. In 2018/19, 86 such requests were received. Requests and complaints are varied in nature ranging from requests for business compliance advice through to the investigation of illegal or non compliant food products and product recall facilitation.

Allergen management in food premises is a significant growing issue and pressure on food standards regulators. Cases of concern often attract national attention and compliance within some food business is difficult to assess and rectify where problems are identified.

A number of business owners in the city do not have English as their first language. These are mainly proprietors of ethnic catering establishments, particularly Chinese and Asian. To assist them to meet their statutory obligations training in food safety management systems Safer Food Better Business (SFBB) has previously been undertaken through the Association of Greater Manchester Authorities (AGMA).

2.5 Enforcement policy

The city council has adopted the Cabinet Office Enforcement Concordat. This is incorporated within the Regulatory Services' Enforcement and Prosecution Policy and quality system. A summary of the findings of the inspection is provided to the business after every visit and a copy of the full [Enforcement and Prosecution Policy](#) is available on the council's [website](#). This has recently been revised to take account of the requirements of the Regulators Code.

Development of the Primary Authority scheme is also an integral aid in the enforcement of food safety and food standards and the service is a key partner in the Greater Manchester Growth Hub strategy "[Better Business for All](#)". Confidence that a single Local Authority is working with a business to improve compliance helps enforcing authorities target resources more effectively to the non compliant businesses.

Regulatory Services will assess all investigations in relation to acquisitive crimes and where appropriate utilise powers under the Proceeds of Crime Act to recover funds gained through criminal conduct

3.0 Service Delivery

3.1 Food premises inspection

Salford City Council considers programmed inspections of food premises to be an essential element in protecting the food available to consumers in their area. In accordance with the Statutory Codes of Practice, all food premises are risk assessed, both for food hygiene and food standards. Risk assessments are entered in the directorate's database, which generates a next inspection date and a food hygiene rating. The date of the next visit is set at the inspection interval determined by the risk assessment of the premises, in accordance with the [Food Standards Agency Code of Practice and Practice Guidance](#) (updated March 2017 and November 2017 respectively).

The Food Standard Agency's Framework Agreement allows a range of food hygiene intervention visits for compliant food premises. As a result of these changes all risk band A and B premises and non compliant band C premises will continue to require a full hygiene inspection or audit on every planned visit. For compliant C, all band D and E premises an intervention visit will be undertaken during these premises inspections unless standards have fallen. Interventions include sampling, monitoring, surveillance, education or verification visit and should enable a lighter touch for compliant premises and enable additional resources to be targeted on non compliant premises in line with the Regulators' Compliance Code.

The approximate make-up of food premises in the area is as follows:

- 36 Manufacturers
- 6 Importers
- 24 Distributors
- 450 Retailers
- 1602 Caterers including restaurants, caring premises and mobile food premises

Due to a number of factors which are addressed later in this report this has been a particularly challenging year for the team in terms of pressures on resources. This has resulted in difficult decisions having to be made regarding the prioritisation of work streams with lower risk inspections and visits being deprioritised and resources focused on higher risk premises.

Despite these difficulties the service has continued to deliver improved food safety in the city with the percentage of food businesses in Salford that are broadly compliant increasing dramatically from 93 to 93.5% during 2018-19, in addition the total number of premises that received the maximum 5 FHRS rating increased from 1098 to 1164 (over 68.3% of our rated premises).

In 2018/2019 the team completed all the planned high risk food programme and also visited over 150 premises outside the original programme. However the majority of the planned visits to low risk premises have been re-profiled to be carried in to the 2019/2020 programme. These visits will be prioritised in the work plan for the first quarter of the year and progress in clearing the current backlog will be closely monitored. Officers within the Environmental Health team also carried out around 52 food standards interventions (focusing on allergen controls in catering premises), 125 smoking interventions and 205 health & safety interventions in the year in accordance with the Health and Safety Plan.

During 2019/20 the target for the Environmental Health team is to inspect 1388 due or overdue premises, consisting 356 high risk premises (bands A to C), 988 lower risk premises (bands D to E), 44 unrated premises and an additional 175 premises outside of the food programme (following change of ownership, usage or following complaints). In addition there are approximately 200 re-visits necessary following the initial inspections. The team will again target all of the due food premises in line with the Food Standards Agency Code of Practice.

Trading Standards conducted visits to all of the high risk premises due in 2018/19. In total 50 businesses received a food standards visit as part of the inspection programme. Furthermore, 11 samples were taken to check compliance with food standards legislation.

For 2019/20 for food standards there are 31 high risk premises, 714 medium risk, 286 low risk due an intervention and a further 56 premises outside the programme. Trading Standards service has identified of these premises all the high risk, 26 medium risk premise

and 17 low risk to be targeted. These businesses are predominantly food manufacturers, food packers, distributors and importers. The other premises will be reviewed, their ratings updated and incorporated into other work streams where appropriate.

In addition, there are approximately 137 public houses in the city. It is the intention to conduct a food standards alternative enforcement intervention at these premises as part of the licensing team's programme of work.

Salford City Council has currently 94.3% of all food businesses (2066 premises out of 2191) rated as broadly compliant (FHRS score of 3, 4 or 5) an increase in 0.8% from April 2019. Levels of compliance by ward ranged from 98.6 compliant in Worsley to 84% compliant in Langworthy.

It is proposed that the Environmental Health will continue to assist Trading Standards colleagues in undertaking food standards intervention work in food premises which were also overdue for food standards and this year the team will do more detailed work with food businesses to raise compliance with allergens in line with our neighbouring authorities. In addition to this the service will continue to undertake health and safety interventions as detailed in the Health and Safety Plan for 2019-20. This is in line with the Government's strategy in easing the regulatory burden on businesses.

Food safety legislation requires all food businesses to have an effective food safety management system in place. In addition all relevant businesses are given a food hygiene rating in accordance with the Food Standards Agency's Food Hygiene Rating Scheme. As the majority of food businesses are affected, all inspected premises are given the opportunity to pay for additional advice and support in order to assist them in understanding and complying with the requirements and to improve their food hygiene rating. Currently there is considered to be adequate expertise within the food team to deal with all foreseeable food activities.

OPSS (Office of Safety and Standards) was established by central government to coordinate enforcement activity across all regulatory activities. From April 2010 this has provided greater direction to enforcement agencies with a strong emphasis being placed on partnership working, desired outcomes and reducing unnecessary red tape for businesses. Salford is currently committed to working with the OPSS and to establish Primary Authority relationships with a number of local and national businesses. Salford is regarded by OPSS as a lead authority in delivery of Primary Authority partnerships and acting as the lead authority in Greater Manchester as part of our strategic approach to regulation as outlined in the most recent Devolution Deal.

In addition to the statutory Code of Practice, Regulatory Service's officers incorporate procedures regarding food hygiene and food standards inspections. This covers officer competency and ensures consistency in actions taken by the service.

The number of food premises with a liability for a Food Standards inspection by Trading Standards in 2019/20 is 1086 with 21 rated currently as high risk. However, targeted survey work scheduled in the business plan for Trading Standards will focus resources on food standards interventions on areas which pose greatest detriment to Salford residents and business. Intelligence gathering from previous years FSA enforcement activity will mean that not all 1086 premises liable for inspection will be visited as resources will be targeted on local and national priorities for food standards.

3.2 Food complaints

The investigation and resolution of consumers' complaints regarding food is an important element of food law enforcement. These are dealt with as a priority with a maximum response target of 3 working days and in 2018/19 the Environmental Health team dealt with

97% of complaints received within this target. In addition to the statutory Code of Practice, the Division's quality system has procedures for dealing with food complaints and for responding to complaints about food premises or practices. The Trading Standards team received 86 complaints/requests for service in relation to food standards.

All service requests are logged in the computer system including details of the action taken and the closing of completed complaints.

3.3 Primary Authority partnerships

The Primary Authority Principle had been adopted by food and Trading Standards authorities as an aid to good enforcement. The aim of the principle is to provide businesses based within Salford or trade in Salford and across local authority boundaries with a source of guidance and advice, provide a system for the resolution of disputes and ensure that there is effective liaison between local authorities nationally. The Primary Authority partnerships are effective in that the advice given by Salford to our partner companies is legally binding and cannot be easily challenged by other regulators giving firm and consistent advice to improve compliance.

As a Primary Authority we liaise with other regulators to ensure that inspection and enforcement action reflects the advice given. In 2019/20 we will also work with the businesses to produce any required national inspection plans, giving guidelines to other regulators to avoid unnecessary burden on the business.

Salford City Council has increased the number of organisations it work with under the Regulatory Delivery's Primary Authority principle and has agreements with Sodexo, Northern Confectionary (Corolldraw Limited), Greater Manchester Mental Health NHS Foundation Trust, Party Delights, Glendale, FE Barber (Kingsland Drinks Limited), Bakery Bagietka, We Can Foods, Hello Fresh, NewkeeCo, Charity Retail Association, RMS International, the Peoples Dispensary for Sick Animals, RRG Group Limited, the Wine and Spirits Trade Association and Northern Restaurants. Officers operate the principle when dealing with food complaint investigations and when there are contentious food hygiene problems at multiple retailers. Advising local businesses that trade nationally, as their Primary Authority, results in less frequent food standards visits than would otherwise be the case as external regulators recognise that a single authority is working directly with the business to improve compliance.

The Local Authorities that operate Primary Authority partnerships assist in targeting of resources at a local level in Salford as we have assurance that issues which may impact premises in Salford are being addressed at a national level via the partnership.

Primary Authority partnerships are operated on a cost recovery basis and the partner businesses pay Salford City Council for the additional work conducted as part of the partnership.

Salford also offer compliance advice to food businesses outside of Primary Authority and recover costs for officer time and expertise. Business support is an essential tool to improve compliance.

Salford City Council success in developing Primary Authority has been recognised by BEIS who have invited Salford Regulatory Services to become a centre of excellence in this field. The Centre of Excellence in Greater Manchester forms part of our combined offer of regulatory support to business through the Better Business for All programme which is included in the devolution deal. This enables OPSS to formally signpost national businesses to Salford to enter into effective Primary Authority partnerships. We now have 7 national food businesses that have approached Salford to partner with us as part of the Greater Manchester Centre of Excellence in Primary Authority.

3.4 Advice to business

In an area where small to medium size businesses predominate, officers from both Environmental Health and Trading Standards services recognise the importance of support for businesses in understanding and complying with the law and all officers advise businesses regarding food hygiene and food standards legislation to promote prosperity in Salford. Basic requests for advice are responded to promptly at no cost to the business as this is seen as an important tool to help small to medium size enterprises (SME) thrive and reducing the cost of compliance (Anderson Review 2009). In 2018-19 the services developed its charging services to support businesses with pre inspection advice or where businesses request a revisit to improve their food hygiene rating in line with other Greater Manchester Authorities. There were 40 premises that received advice visits last year and a further 28 businesses requested a FHRS revisit that assisted businesses to gain confidence in maintaining their hygiene practices, reducing the level of enforcement work at the subsequent food hygiene intervention and a further improvement in the overall levels of compliance across the city.

The Environmental Health team routinely discusses guidance from the Food Standards Agency to assist catering businesses achieve a hazard analysis and critical control point (HACCP) food safety management system that complies with the current Food Standards Agency's guidance. For the majority of businesses the "Safer Food Better Business" (SFBB) guidance is utilised and discussed in detail during the routine programmed work of the team.

3.5 Food inspection and sampling

Food officers inspect and undertake programmes of food sampling that are co-ordinated with all North West food authorities and the Food Standards Agency. The council has a sampling policy and procedure which is based on intelligence and concentrates on high risk products to ensure the delivery of safe food to the public.

The total number of microbiological food samples sent to the Public Health England (PHE) laboratory was 87 in 2018/19 from over 20 different premises throughout Salford.

The Environmental Health team's measuring equipment e.g. thermometers, food storage facilities and cool boxes are regularly calibrated in order to ensure their accuracy as measurements obtained may be used to support legal proceedings.

Other food samples are sent to the Public Analyst at Lancashire County Council for testing. These foods are sent for numerous tests including composition and contamination testing.

The Trading Standards team submitted 11 samples for food standards compositional testing in 2018/19. The results of this analysis allow resources to be targeted where areas of non compliance are identified. Where adverse results have been reported appropriate action has been taken ranging from advice, warnings, formal cautions and prosecution.

3.6 Control and investigation of outbreaks and food related infectious disease

Salford City Council's Food Safety Procedures outline the service's partnership with the PHE's Greater Manchester Health Protection team for the investigation of food poisoning. The investigation procedure also outlines the criteria leading to a declaration of an outbreak.

Such outbreaks are managed and investigated according to the Division's Major Outbreak Plan which has been recently revised and there is a current Greater Manchester Joint Plan for the Investigation and Control of Legionella Infection. The GMHP Team operates an out-

of-hours stand-by system for infectious disease and routinely notifies the service of infectious diseases that warrant further investigation by the Environmental Health team.

3.7 Food safety incidents

Should food safety alerts be received appropriate action is decided on and taken in accordance with the FSA's Food Law Code of Practice (England) and the service's quality system procedures. The food hygiene team leader carries a mobile phone, which gives an alert in the event of all serious food hazard incidents. The service also operates an out-of-hours stand-by system for the receipt and initial action for food alerts.

It is estimated there will be approximately 45 alerts this year. The majority of these are likely to be for information, with a limited number requiring local action. Each alert however requires scrutiny and decisions on action to be taken. Where action is deemed necessary, the extent of this action will vary and it is estimated that there will be 5 such incidents each year. The Trading Standards team also monitors allergy alerts and take action where necessary.

3.8 Liaison with other organisations

The service liaises directly with neighbouring local authorities' food officers directed by the Greater Manchester Public Protection Managers' Group representing the 10 Greater Manchester authorities. In accordance with the group's business plan, regular meetings of the Greater Manchester Food Liaison Group are used as a forum to achieve consistency of approach in enforcement activities.

Salford's Food Safety Lead Officer also represents all the North West Food Authorities at the national Food Hygiene Focus Group that includes representation by the FSA. The purpose of group is to provide technical guidance and advice to regulatory officers and where appropriate the business sector, offer opinion and to challenge central government agencies on operational and strategic processes. The support and advice provided by FHFG assists the central agencies coordinate enforcement, share good practice and provide specialist and expert advice to local authorities in the UK.

The Environmental Health service is also represented at regular meetings of the GMHP Team and United Utilities and is involved in liaison and meetings with Safeguarding, regarding standards in a wide variety of care situations.

3.9 Food safety and standards promotion

The local spotlighting group looking at obesity identified that no pre-school children have currently received attention to tackle obesity. Environmental Health officers are well placed to visit nurseries to assess and encourage change, where necessary, to improve nutritional standards of food served to children as well as promoting a general healthy eating lifestyle to nursery providers, children and parents.

The main initiatives for 2019/20 are:

Raising standards in food businesses

With a high turnover within non compliant risk food businesses despite rising compliance levels elsewhere the team will use intelligence from our partners organisations to progress and to improve compliance. For example, interventions concentrating on pre-requisites/structures, use of a Hygiena ATP machine to improve cleaning effectiveness, improving links with business rates, incorporating additional food standards visits and allergen compliance to our hygiene inspection programme and targeted enforcement action where previous history of non compliance exists. The team will continue to publish individual hygiene standards of all of Salford's food premises by updating details of their food safety

rating at their last inspection on the [Food Standards Agency website](#) and to target opportunities to maximise compliance within Salford's premises.

Food Standards visits

The Environmental Health team will build on the initiative that started in April 2016 to give advice and ensure food standards compliance during their food hygiene intervention. The main focus will be allergen compliance within caterers such as takeaways and restaurants ensuring suitable controls are in place to comply with both the Food Information Regulations and Food Safety Act 1990 and to ensure there is accurate traceability for the food on sale.

Sampling Interventions

We will take an active part in the Public Health England's sampling programme that includes caterers to target cleaning standards with these premises by undertaking food sampling or surface swabbing and sandwiches. We are also planning of taking some samples from takeaway and butcher premises to check for labelling compliance and speciation.

All on Mobile

The introduction All on Mobile was a key improvement to digital solutions within the service identified under the transform programme which will significantly improve the efficiency of the inspection of low risk food premises. The rollout of the software was anticipated during 2018-19, unfortunately this did not occur and the introduction of All on Mobile is now expected in 2019-20.

The EH team will start using the All on Mobile app on their iPads to improve the recording of intelligence and interventions on to the services' Civica database and provide reports from officers to be emailed to businesses immediately after completing the visits to highly compliant premises.

Food standards service initiatives

Food Standards Agency (FSA) Coordinated and local sampling priorities

Trading Standards will procure food samples across the City and wherever possible and appropriate incorporate this activity with our high risk food inspections. The coordinated approach to sampling enables the authority to establish a wider understanding of the concerns nationally which may impact Salford consumers and businesses. Some food standards samples are funded by the FSA, others are locally funded.

Food labelling Premises supplying food not labelled in English

Identify premises that are selling food not labelled in English. This work will continue in conjunction with the licensing team who are visiting off licences. This action protects consumers but also supports legitimate businesses that are investing a lot of time and effort in sourcing English labelled products.

Food Fraud and traceability

Salford Trading Standards will continue to work with partner agencies at a national and international level to tackle large scale food fraud. Trading Standards conducted a visit to a business premises in Salford which is of concern to Salford Trading Standards, Wine Standards Board and HMRC as part of an international campaign to tackle Food Fraud.

We will continue to be actively involved in multi agency operations with Police and other partners at alcohol retailers and wholesalers in Salford. Advice will be given to businesses in relation to responsible retailing of alcohol and buying from legitimate traders. Appropriate enforcement action will be taken if any food is found which is untraceable or counterfeit.

Food Information Regulations

The Food Information Regulations brought significant changes in legislation specifically around allergens and information given to consumers to make an informed and safe choice in relation to food.

We will continue to work with businesses to help them achieve compliance with the legislation.

We will continue to support larger businesses through consultancy and Primary Authority advice to ensure systems are developed to ensure public safety in relation to allergens in food.

4.0 Resources

4.1 Financial resources

Env. Health	2015/16 Actual	2016/17 Actual	2017/18 Budget	2018/19 Budget	2019/20 Budget
Food (F1001)					
Expenditure	£424,435	£421,171	£418,147	£408,511	£391,504
Income	0	0	0	0	0
Head Count	7.35	6.65	6.65	6.65	7.2
Cost per head of population	£1.81	£1.80	£1.79	£1.75	£1.56

Trading Standards (Food Standards)*

Description	2015/16 Actual	2016/17 Actual	2017/18 Budget	2018/19 Budget	2019/20 Budget
Excl Overhead Reallocations					
Revenue	£66,855	£70,670	£73,087	£67,273	£75,331
Expenditure					
Income	-£4,923	-£12,516	-£11,981	-£10,229	-£12,004
Head count	1.25	1.25	1.25	1.25	1.25
Cost per head of population for the Service	£0.26	£0.25	£0.26	£0.24	£0.25

**The above figures reflect the Food Standards element of the Trading Standards Service.*

4.2 Staffing allocation

The level of resources within the Environmental Health team which are committed to food safety enforcement equates to 6 full time equivalent environmental health officers and one senior scientific officer holding the Higher Certificate in Food Premises Inspection. Clerical back-up is provided by Regulatory Services administration support officers.

Within the Trading Standards team there are currently 3 FTE operational Trading Standards officers who are qualified to undertake food standards enforcement work. As always, we will ensure that resources are used to undertake targeted on the areas of greatest risk as detailed in the directorate's business plan and the level of performance will meet national priorities. It is envisaged that through recruitment in 2019 FTE will increase to 4.5 FTE.

4.3 Staff development

Salford City Council's Regulatory Services is monitored through the quality system, with line managers responsible under the revised Employee Performance and Development Review Scheme of officers and determining their training needs and competency in accordance with the updated Chapter 4 of the Food Standards Agency's Food Law Code of Practice (England).

In addition the professional institutes, the Chartered Institute of Environmental Health and the Chartered Institute of Trading Standards, operate Continual Professional Development (CPD) schemes. All officers who enforce either food standards or food hygiene laws are required to undertake a minimum of twenty hours training per annum.

The Food Safety Policy and Quality Procedure detail the council's commitment to enabling all food officers to obtain at least ten hours of certified continuing professional development, required by the Food Standards Agency Code of Practice.

In addition to the above officers within the Food Team have also benefited from training on cross cutting issues such as the application of powers under Police and Criminal Evidence Act 1994, provided across Regulatory Services.

4.4 Information technology

Development and refinement of a database for all food activity is seen as essential for a consistent and organised delivery of food safety enforcement in the authority. APP (Civica) generated returns to the Food Standards Agency have been achieved with Trading Standards food samples continuing to use the FSA's UKFSS net to record all their food samples.

The APP IT system is also used for tracking due food visits, service requests, infectious disease notifications and food samples and for sharing intelligence with other regulators and partners.

For 2019/20 All On Mobile will also be used for recording some of the team's interventions to provide timely reporting to food businesses following their routine intervention visit.

5. Quality Assessment

A number of quality monitoring aspects e.g. response times are built into the division's quality system. These procedures are available electronically on the council's intranet, to ensure quality and consistency of food enforcement.

A programme of visits is drawn up to ensure the procedure requirement is met. Regulatory Services has previously received the Government's Customer Service Excellence award for excellence in customer service.

6.0 Review

6.1 Reviews against the service plan

Prior to the drafting of the service plan, a review took place of the previous year's performance against the service plan and the Food Standards Agency targets. This has been carried out for last year's plan as detailed in (6.4).

6.2 Identification of any variation from the business plan

This will be identified and reasons given in each year's business plan. Any necessary action will be included in the following year's service plan. In Salford we operate a rigorous

business planning and performance management system that enables management to monitor performance on a monthly basis and take the appropriate remedial action.

6.3 Areas for improvement

Where there are any relevant improvement plans or service developments identified, these will be set out in the Environmental Health or Trading Standards business plans.

6.4 Review of plan for 2018/19:

- The service completed all of the high risk food hygiene inspections and a third of the low risk inspections and increased advice, enforcement work and visited 150 additional premises that were outside the original programme. The shortfall is due to, amongst other factors:
 - Unexpected impacts from changes to the regime for animal welfare licensing that required increased officer input,
 - increased advice and Primary Authority work,
 - an increase in long term staff absences,
 - the recruitment of two new officers within the Environmental Health team (equivalent to 1.5 FTE) not being achieved until September/October and those officers not being fully authorised to assist with the food inspection programme.
 - the implementation of changes agreed under the Transform Programme including the delay in the roll out of expected digital solutions.
- For 2019/20 the work plan for the service has been revised to allow for the delivery of the programmed inspections on a 10 month basis with Level 1 officers focusing on undertaking lower risk inspections.

This approach both builds in resources to clear the backlog of low risk inspections being carried forward from 2018-19 and to respond to any unexpected pressures.

April and May will be used to reduce the backlog of low risk inspections with all officers being tasked to this area of work for these months.

Specific programmes of inspections will be allocated to officers at the start of the year and progress monitored closely on a monthly basis with work plans being amended as necessary in response to emerging pressures.

- The percentage of food businesses in Salford that are broadly compliant increased dramatically from 93 to 993.5%, that is a direct effect from increased advice work offered by the service and a specifically designed initiative targeted at non compliant catering premises. In addition the total number of premises that received the maximum 5 FHRS rating increased from 1098 to 1164 (over 68.3% of our rated premises). The improved compliance standards are continuing across all food businesses due to the advice and support the team provide during our inspections to assist businesses to comply with their listeria and E.coli guidance and FHRS brand standard. For 2019/20 further work is planned to look at the wards and premises types that are not as compliant to further target improvements.
- With the increased media interest in allergens and difficulties business face with compliance the team will have a continuing emphasis on allergens during their food standards interventions. The service issued 87 allergy voluntary prohibition notices in the previous year where businesses were not able to manage suitable controls were in place to manage the risk of allergens within their business.

- The team's enforcement from the previous year's continued in 2018/2019 with two premise voluntary closures, 5 simple cautions issued in four very poor takeaways and one retail premises.
- The Food Standards Agency's continuing emphasis on food traceability and speciality has already led to the team discovering a number of food importers and associated issues. This work has been identified as requiring continuing resource and has been achieved by changes to resource allocation through the business planning process.
- To assist businesses to comply with the revised food safety regulations, additional guidance and an increased demand for support was required from the service to ensure that businesses were able to change their procedures and practices in line with the changes in legislation. This resulted in the distribution of the Food Standards Agency's 'Safer Food Better Business' pack to a further 153 businesses in 2018/19 with the majority being new businesses or those paying for additional support.
- A high risk / non compliant takeaway initiative was undertaken that targeted approximately 20 non compliant premises with the provision of additional support and guidance. This resulted in 2 premises getting further support and the other business likely to receive increased enforcement activity at their next routine food hygiene inspection.
- A revised street trading consent scheme was implemented to improve controls on mobile vehicles operating in the City and to enable all street traders to renew their street trading consent on line. It is pleasing to note that all street traders operating in the City are compliant with the 84% of the traders receiving a 5 "very good" rating and 16% with a 4 "good" rating. Additionally, moving this aspect of the team's work online has proven successful with the new procedure being taken up by the trade and resulting in improved efficiency, increased accessibility and reductions in the number of partially completed applications being submitted.
- Pre-inspection advice letters are sent out to give food business operators the opportunity to achieve compliance before the regulatory inspection at a lower cost than a FHRS revisit.
- Guarding letters were sent were out to all relevant food businesses before inspection to ensure safety of equipment before the regulatory inspection and resulted in a number of improvements to guarding of food machinery and a rise in the number of formal notices being served for non compliance.
- Work continued with The Wine and Spirits Trade Association to encourage best practice in the sector. The advice provided is helping to promote compliance and consistency across the industry. The development of a code of practice that will look to promote national best practice in this sector continues and sector specific advice on inappropriate and misleading advertising was progressed.
- Allergen management in food businesses has been a priority for Trading Standards. 2018/19 saw the development of a 'tool kit' to assist businesses to comply as well as undertaking a consistency exercise to ensure that officers are robust in their approach and consistent in their delivery of food standards enforcement work. This work will continue in 2019/20. The recording of allergen incidents has also been adapted so that data relating to 'allergen near misses' is captured.
- A complex piece of work was undertaken with a large food service business to help them manage acrylamide levels in their foods. This has allowed the business to implement changes to their food safety management systems and identify where risks were present.

- The substitution of spirit drinks in licensed premises was investigated. This resulted in formal samples being obtained that showed high value, premium brands were being substituted with inferior spirits. Formal cautions were obtained in line with the enforcement and prosecution policy.
- The Environmental Health team achieved the objectives of the business plan which are aligned to national priorities.
- In 2018/19 following a previously reported deterioration in a number of non compliant businesses in 2017, the number of high risk food hygiene premises decreased (Band A) from 3 premises to 1.
- The food hygiene team incorporates some food standards work at premises they visit, especially raising awareness of their allergy obligations. The aim is to reduce the burden of inspection on businesses, with any concerns being fed back to the appropriate team so an intelligence led approach can be taken to any interventions required.
- The Trading Standards service submitted 11 food samples for analysis for compliance with compositional requirements as part of the North West coordinated sampling plan and as a direct result of complaints and ongoing enforcement activity.
- During the year the Trading Standards team dealt with a food standards related product recall concerning the presence of milk in products declared as 'gluten free' and 'dairy free'.

Feed Service Plan 2019/20

Intro

The Food Standards Agency (FSA) is the government body that sets out the national policy relating to feed safety issues. This plan is produced in accordance with national guidelines and the 'Framework Agreement' which sets out what the FSA expects from local authorities in their delivery of official feed controls.

The FSA requires the publication of an annual service plan produced in accordance with the statutory Code of Practice.

The publication of this plan demonstrates Salford City Council's commitment to fulfil its statutory obligations in the delivery of feed hygiene enforcement functions, and to ensure that national and local feed hygiene priorities are addressed.

Our activities are conducted in accordance with the Regulators Code which states:

- Regulators should carry out their activities in a way that supports those they regulate to comply and grow
- Regulators should provide simple and straightforward ways to engage with those they regulate and hear their views
- Regulators should base their regulatory activities on risk
- Regulators should share information about compliance and risk
- Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply
- Regulators should ensure that their approach to their regulatory activities is transparent.

Aims

The overall aim of the service is:

'To ensure that all feed produced, stored, distributed, imported to, handled and/or sold within Salford is safe and complies with the legislation relating to its safety, hygiene, composition, standards and labelling.

Objectives

Improve compliance with feed safety law through the implementation of a risk based and intelligence led work programme, targeting advice and enforcement at the highest risk activities.

Approve and/or register all feed business establishments operating in the authority's area

Record all intervention activities undertaken to comply with regional and national reporting requirements

Scope

The Council has responsibility to enforce all aspects of current feed hygiene legislation. This function is planned, implemented, monitored and reported on by the Lead Feed Officer, within Trading Standards (Regulatory Services). Activities include:

- Feed hygiene interventions, in accordance with risk based selection criteria,
- Complaint investigations concerning animal feed and feed businesses,
- Feed sampling to assess compositional and labelling conformity
- Responding to feed safety incidents and feed alerts reported by the FSA or via RASFF
- Maintaining a register of approved and/or registered feed business establishments

In accordance with section 27 of the Food Safety Act 1990, the service has appointed Lancashire Scientific Service act as “public analyst” on behalf of the Authority, and as the appointed ‘Agricultural Analyst’ under S.67 of the Agricultural Act 1970.

Demand

There are 252 premises with a feed hygiene inspection risk. However, the majority of these are retail premises selling pet food and as such do not attract as risk rating that the service would prioritise.

96 premises are registered with the authority. These premises include farms, co-product producers, storage facilities, distributors and transport companies, pet food manufacturers and surplus food suppliers. These premises form the basis of the authorities inspection programme. In the last 48 months we have attained a more detailed understanding of the risks these premises pose. We continually review and assess the premises to ensure that they are appropriately registered and risk rated.

Table 1. Registration by compliance rating

COMPLIANCE RATING	NUMBER OF PREMISES
Poor	2
Varying	10
Satisfactory	57
Broadly compliant or better	18
Member of assurance scheme	9
Premises never visited	0
TOTAL	96

Table 2. Planned Activity 2019 -2020

Planned activity is aligned with the FSA desktop modelling exercise and co-ordinated National Trading Standards Feed Delivery Model to ensure that resources are targeted in areas of greatest risk. Code of Practice inspection frequencies and desktop modelling indicate the following inspections are required in 2019/2020.

REGISTRATION CODE	PREMISES REGISTRATION TYPE	NUMBER TO BE INSPECTED 2019/2020
R12	Co Product Producer	6
R07	Supplier of Surplus Food	6
R13	Livestock Farms	1
R14	Arable Farms	1

	Total	14
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Authors: John Snow, Emma Norman and Chris Wilkinson