

Document Control Information



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Public Protection Partnership
OFFICIAL FEED AND FOOD CONTROLS SERVICE PLAN 2019- 2020

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It is a requirement that Local Authorities produce a Feed and Food service plan each year, the format of which is contained within the Framework Agreement on Official Feed and Food Control by Local Authorities.

Contents:

1.0 SERVICE AIMS AND OBJECTIVES

1.1 Aims and Objectives

1.2 Themes from the PPP

2.0 BACKGROUND

2.1 Profile & Organisational structure

2.2 Scope of the Feed and Food Service

2.3 Demands on the Feed and Food Service

2.4 Service Contact Details

2.5 Regulation Policy

3.0 SERVICE DELIVERY

3.1 Interventions at Food and Feeding stuffs establishments

3.2 Food and Feed Service Requests & Complaints

3.3 Primary Authority Scheme

3.4 Advice to Business

3.5 Feed and Food Sampling

3.6 Control and Investigation of Outbreaks and Food Related Infectious Diseases

3.7 Feed and Food Safety Incidents

3.8 Liaison with Other Organisations

3.9 Feed and Food Safety and Standards promotional work and other non-official controls and interventions

4.0 RESOURCES

4.1 Financial and Staffing Allocation

4.2 Staff Development Plan

5.0 QUALITY ASSESSMENT

5.1 Quality Assessment and Internal Monitoring

6.0 REVIEW

6.1 Review of Delivery Plan

6.2 Identification of Any Variation From the Delivery Plan

6.3 Areas of Improvement

APPENDIX

Appendix A – Relevant Officers

TABLES

Table 1: Proposed feed & food standards 2019-20 intervention programme

Table 2: Proposed food hygiene 2019 -20 intervention programme

Table 3: Estimated resources required for feed and food hygiene and standards programme

1.0 Aims and Objectives

1.1 Aims and Objectives

The annual feed and food law enforcement plan “the plan” is designed to deliver on the Public Protection Partnership (PPP) aims and priorities in respect of promoting and protecting health and supporting reputable businesses. This plan covers the local authority areas of Bracknell Forest, West Berkshire and Wokingham, and in accordance with the framework agreement on official feed and food law control service planning as set out by the Food Standards Agency (FSA). Specifically it sets out how these authorities regulate and protect the food chain from ‘farm to fork’ in respect of feed quality, food hygiene, food standards and labelling requirements.

The plan seeks to deliver a focussed approach through the successful use of information and intelligence and should be viewed in that context as PPP’s ambitions to deliver its services using principles adopted from the national intelligence model going forward.

It is the responsibility of feed and food business operators to ensure compliance with relevant standards. It is the role of the PPP to ensure that those businesses accountable for not meeting such standards are handled in a consistent and proportionate manner in order to meet the standard. Maintaining this approach provides consumers protections and allows consumers to make informed choices. The success of the PPP are managed using key performance indicators that align with requirements set out within the framework agreement on official feed and food controls.

The programme is structured to ensure it aligns with the overarching priorities set out by the inter authority agreement, and subsequently the PPP strategic assessment.

Key Objectives

- To ensure the PPP carry out planned inspections within higher risk feed and food businesses. This includes the provision of legal and practical advice at the time of the visit to improve compliance rates.
- To apply alternative interventions and approved strategies where lower risk premises are concerned, that are in line with relevant approved Codes of Practice E.g. Earned recognition and alternative enforcement strategy.

- Assess unrated and new premises to bring them into the risk based audit programme.
- By analyzing intelligence and information entering the service, identify where current hygiene & quality standards are not being met.
- To respond to customer complaints and requests for our service as well as requests for advice from businesses.
- In line with national priorities to ensure relevant approved premises, primary producers and feed business operators achieve compliance with the relevant feed and food hygiene requirements.
- To provide information to consumers to allow them to make informed choices.

1.2 Themes from the PPP

The relevant Public Protection Partnership themes (as stated in the workplan and developed in the priority documents) are:

- 1) Community Protection (including tackling the issues that cause the greatest harm to individuals)
- 2) Protecting and Improving Health (including allowing residents to make informed choices and delivering initiatives designed to improve and enhance health).
- 3) Supporting Prosperity and Economic Growth (including the provision of advice to businesses and protecting them from unfair trading).

2.0 Background

2.1 Profile & Organisational Structure

On 6th January 2017 Bracknell Forest Borough Council (BFBC), West Berkshire District Council (WBDC) and Wokingham Borough Council (WBC) entered into a joint service, inter authority agreement (IAA) for Trading Standards, Environmental Health and Licensing. This function is provided by the PPP and the food and feed functions fall under the remit of the Public Protection Manager. PPP governance arrangements have led to the PPP being directed by a separate committee of elected members representing of each authority who are advised by a Joint Management Board (JMB) made up of Senior Managers representing each authority.

The PPP serves a rising population of almost ½ million residents, comprising of around 120,000 (BFBC), 160,000 (WBDC) and 165,000 (WBC). Whilst the three authorities share many similarities such as the types of businesses, their more modern industrial and historic towns and villages, political governance, and health demography, each area is also unique. For example, major retail, shopping and leisure facilities within the Lexicon can be found within BFBC, higher density student living linked to Reading university and the highly attended Henley festival features within WBC. Within West Berkshire, rural landscapes, farming and horse racing are common place.

The service is undergoing a significant structural change, which affect the way in which delivery of feed, food hygiene and standards matters are carried out. 4 distinct functional areas – ‘Response’, ‘Programme delivery’, Compliance and Enforcement, and Case Management Unit’, with each having a role in protecting consumers from farm to fork.

2.2 Scope of the Feed and Food Service

The PPP has responsibility for the following areas of the feed and food chain:

- Ensuring the accuracy of food labels and descriptions that are applied to feed and food products;
- Ensuring claims made in the course of the marketing of food are accurate and legal;
- Ensuring feed and food hygiene and food standards are enforced appropriately;
- Ensuring Food Alerts relating to feed and food hygiene and food standards are acted upon in a proportionate and consistent manner;
- Ensuring standards are met at primary production (farms and growers) and approved premises;
- Ensuring feed hygiene and compositional required standards are met throughout the supply chain and on farm;
- Ensuring businesses are appropriately advised in line with the advice policy;
- Ensuring that consumers have the required knowledge base to make informed choices when purchasing feed or food;
- Ensuring complaints from consumers relating to feed or food issues are assessed and assigned to an officer for action and/or are recorded for intelligence purposes;
- Supporting local, regional and national programmes delivered by other relevant partners;

If appropriate, other relevant inspections or regulatory checks and assessments will be carried out at the time of the feed and food hygiene and food standards inspection. For example, product safety, licensing matters, weights & measures regulation, health, safety and welfare, living conditions and energy efficiency. This may also include wider cross cutting issues for PPP, such as immigration issues, modern day slavery and fraud. Such interventions are dependent on the premises type, risk assessment and resource levels available. PPP aims to target interventions at the most critical points within the most high risk areas based on the PPP strategic assessment.

2.3 Demands on the Feed and Food Service

The Service offers confidential and impartial advice for businesses within its area. This includes dealing with complex and technical enquiries (such as allergen, FHRs, FHMS systems, approved premises, feed composition and exportation of food stuffs) along with inspecting and monitoring activities; all of which are essential and significant proportions of the workload associated with feed and food service delivery. The 2019/20 strategic assessment identifies feed and food hygiene service delivery as one of its strategic priorities.

The Food Standards Agency has allowed local authorities to adopt a more flexible and varied approach in developing a suitable strategy to maintain compliance. As a result the PPP will continue to visit a number of high and medium risk food premises but look to alternative enforcement strategies to keep under review low and non-inspectable risk food premises. Audits and sampling will continue to be targeted at nationally or locally recognised areas of concern. Where there is a primary authority arrangements in place, officers will have regard to any inspection plan published.

Although changeable, the Partnership currently has approximately 3200 food businesses on its databases liable for food hygiene & food standards intervention. Local Authority Enforcement Monitoring (LAEM) provides a detailed snap-shot profile for feed and food hygiene matters in respect of the number, type, risk, locality, and so on. The LAEM returns are reliant on proper maintenance of database use and the PPP resources specialist officers to ensure database quality is maintained across the partnership. This is in addition to other 'back-office' support services that deliver the PPP model.

Food Standards

Of those 3200 premises, where food standards are concerned, around 50 are classified as high risk, 480 medium risk, and approximately 1290 are low risk. Approximately 500 are outside of the scope of the programme.

The remainder are made up of unrated premises. This presents the biggest challenge for the service as these need to be brought back into the audit programme. The 2019/20 priorities work-plan for PPP recognizes resources will need to go into this area of work to ensure those premises not yet risk assessed will need to be so, and as such this is included in the feed and food service plan.

Feeding Stuffs

In terms of feed premises there are 598 primary producers (including livestock farms) and 103 inland feed premises.

The risk rating for each premises is assessed at each visit and by reference to events such as levels of compliance, local risk and the category of individual businesses. In addition the service have regard to the principles of the Hampton Review, ensuring that no inspection is conducted without reason and local risk factoring is applied.

Food Hygiene

Higher risk premises in respect to hygiene account for around 5-10% of the total number of premises subject to intervention; the remainder would be considered to be broadly compliant. The 3 authorities have 14 local authority registered approved premises. All premises subject to inclusion within the food hygiene rating scheme are assessed and managed in accordance with the FHRS practice guidance.

Primary Authority

PPP have Primary and Home Authority responsibilities, which includes allocating time to our major food producers.

Currently, PPP have 3 arrangements in place relevant to the feed and food service; Prezzo, HiPP and Waitrose.

2.4 Service Contact Details

Email:

tsadvice@westberks.gov.uk or ehadvice@westberks.gov.uk

Telephone:

01635 519930 (Out of hours 01635 42161)

Located at:

Council Offices, Market Street, Newbury, Berkshire. RG14 5LD

Civic Offices, Shute End, Wokingham, Berkshire RG40 1WW.

Council Offices, Time Square, Market Street, Bracknell RG12 1JD

Opening hours are 9am-5pm Monday to Thursday and 9am to 4.30pm Friday.

2.5 Regulation Policy

The Enforcement policy for the Public Protection Partnership (PPP) comprises of:

- 1) The Regulators Code – this forms the guidelines that PPP uses for the basis for general enforcement work,
- 2) The Code for Crown Prosecutors – this forms the basis for decisions to prosecute in all criminal matters;

In the context of this policy, the PPP consists of those matters enforced by the Trading Standards, Environmental Health and Licensing Services.

For the Code for Crown Prosecutors see:

https://www.cps.gov.uk/sites/default/files/documents/publications/code_2013_accessible_english.pdf

Regulators Code:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf

3.0 Service Delivery

3.1 Interventions at Food and Feedingstuffs establishments

Each local authority is required by the Food Standards Agency's Codes of Practice to document, maintain and implement an interventions programme for those premises for which they have enforcement responsibility.

There is a risk based approach in relation to feed and food advice and enforcement. Resources dedicated to feed and food related activities are balanced against the demands of other regulatory activities. This risk based approach allows more intensive regulation to be directed at those businesses presenting the greatest risk.

Official controls include – inspection, audit, surveillance, verification, sampling and monitoring and other interventions which can effectively support businesses to achieve compliance with legislative requirements include – education, advice, information and intelligence gathering. The different interventions allow the authority to choose the most appropriate action to be taken to increase levels of compliance. This fits with the PPP model or service delivery using Prevention, Intelligence and Enforcement (PIE) principles.

We aim to carry out interventions to those premises in line with the Food Standards Agency profiling.

Where appropriate animal health Inspectors will carry out some of the feed hygiene and food standards inspections alongside their routine animal health visits. Carrying on with the same principles, food standards work will be carried out alongside food hygiene and licensing audits in similar and appropriate premises.

Table 1: Proposed Feed & Food Standards 2019-20 Intervention Programme.

Category	No of premises due (BFC)	No of premises due (WBDC)	No of premises due (WBC)	Total	Target/commentary
HIGH	17	13	15	45	100% delivery expected
MEDIUM	86	106	84	276	100% delivery expected
LOW	435	254	168	857	Inspections in response to complaints, request by the business or as part of identified projects.
UNRATED	-	600	348	948	Action plan to be introduced to address outstanding unrated list.
Inland Feed	2	11	6	19	100% delivery expected
Primary Production (feed)	1	3	2	6	100% delivery expected
Primary Production (food)	0	1	2	3	100% delivery expected
Regional Feed	Approximately 100 premises which are grant funded/shared outside of PPP. 100% expected.				

Table 2: Proposed Food Hygiene 2019-20 Intervention Programme.

Risk Category	A (2 visits required)	B	C	D	E	Unrated (predicted)	Target/commentary
Bracknell	0	18	109	84	179	173	75 % (Unrated) within 28 days of trading and 100% of expected higher risk premises.
West Berkshire	1(2)	31	149	188	171	167	75 % (Unrated) within 28 days of trading and 100% of expected higher risk premises
Wokingham	0	27	124	159	140	106	75 % (Unrated) within 28 days of trading and 100% of higher risk premises
TOTAL	1(2)	76	382	431	490	446	

Table 3: Estimated resources required for Feed and Food Hygiene & Food Standards programme.

Risk Rating	No. of Premises Due 2019-20	Estimated (hourly) time per intervention	Total
A/High	47	5	235
B/Medium	352	4	1408
C/Low	1239	3	3717
D (partial insp visit)	431	2	862
E (Alternative enforcement strategy)	490	2	980
New Premises/Unrated	446 (Hygiene) 948 (Standards)	3	4182
Inland Feed and Primary Production Inspections	128	3	384

The total time expected to deliver on all planned feed and food interventions would be in the order of 11768 hours.

3.2 Feed and Food Service Requests & Complaints

Food and feed complaints are investigated by the service in line with departmental procedures. In responding to complaints we aim to ensure that:

- appropriate action is taken as necessary under relevant legislation;
- feed and food is accurately labelled, advertised, wholesome and of the composition to meet legal standards;
- industry standards and best practice are promoted;
- new and existing business enquiries are responded to with appropriate levels of support and/or signposting.

It is assumed that the number of service requests associated with feed and food matters for 19/20 will be in line with previous years. This amounted to approximately 8-10% of the overall demand of service requests for PPP (which was approximately 12500 service requests).

3.3 Primary Authority Scheme

The concept of Primary Authority was formalised under the Regulatory Enforcement and Sanctions Act 2008. Under this legally recognised scheme (overseen by the Regulatory Delivery), any business operating across more than one Local Authority can form a legally recognised partnership, effectively creating a focus for consistent advice. It is the gateway to simpler, more successful local regulation, and previous changes to the scheme has meant a significant expansion to the range of businesses that can participate, to now include so-called 'Co-ordinated Partnerships', such as franchise operations, trade associations and other business groups.

We offer Primary Authority partnerships to businesses wishing to take advantage of the scheme.

Currently we are in a primary authority relationship with two food companies, Prezzo Ltd and HiPP UK Ltd, and these businesses currently require higher demands in relation to food hygiene as opposed to large food standards. This is primarily through inter-authority advice and preparation of inspection planning.

3.4 Advice to Business

As part of the PPP Model in service delivery, the Public Protection Partnership have implemented the principle of providing advice and information based on legislative requirements and recognised Codes of Practice. The newly created PPP website and response team, including support services will handle all the initial requests and triage accordingly. Not only will customer facing services be delivered in this way, officers pro-actively provide advice and guidance during the programmed inspection of premises.

Resources to deliver business advice are drawn from across the competent officers identified in the service.

The Public Protection Joint Committee has agreed to continue supporting the Home Authority Principle but that this work will become chargeable at the same rate as Primary Authority work. Small businesses will receive up to half an hour of free advice.

3.5 Feed and Food Sampling

The PPP recognises the important contribution targeted sampling makes to the protection of the food chain.

The PPP produces both its own annual sampling programme and contributes to local, regional and national programmes to establish the effectiveness of the management of food and feed standards in local businesses. Sampling is a way of testing the products integrity and endorse the effectiveness of any given management systems designed to ensure feed and food is safe, of correct composition and/or meets legal standards. Where evidence directs to poor management controls, or say deliberate adulteration and fraud, PPP will take action accordingly. The resilience within the PPP is sufficiently flexible to take account of any areas which require attention as they arise i.e. food incident warnings, consumer complaints.

Testing this year will include food supplements for unauthorised ingredients and non-permitted health claims, vehicles for potential cross contamination, identifying local on line sellers and bringing them into compliance, as well as looking at a range of issues such as allergen control and meat and fish speciation.

We anticipate this will translate to approximately 100 food and feed samples being taken in the next financial year.

3.6 Control and investigation of outbreaks and food related infectious diseases

The PPP responds to notifications of infectious disease which can be highly damaging to both individuals and the reputation of a business if implicated. Reports might be based on sporadic cases or outbreaks. Where notifications are received from the Health Protection Unit of Public Health England, the PPP investigates as necessary. More serious cases are led by the Consultant in

Communicable Disease Control and the PPP routinely form part of any outbreak team where outbreaks occur in its area, or are linked to feed and food production within its areas.

Like any investigation, the purpose of investigating infectious disease is to isolate the source and control the spread by taking appropriate action where the legal standards have not been met.

There is a Joint Infectious Disease Incident Plan for Berkshire in place that was produced in conjunction with the Health Protection Unit which can be activated on a 24 hour basis for larger and/or cross boundary matters.

Campylobacter makes up the vast majority of reported cases received, (around 85%) which is in line with the nationally understood profile. The number of incidents of all infectious diseases reported is very similar across the 3 authorities, and the PPP can expect around 800 notifications throughout the year across the three areas.

3.7 Feed and Food Safety Incidents

Food and Feed Alerts are issued by the Food Standards Agency (FSA) to all Food Authorities in the country when a national food or feed safety issue has arisen with a specific product.

Alerts are responded to as directed by the warning notification received from the FSA and in accordance with the Code of Practice.

All warnings are received by email and any subsequent action taken is recorded and retained on file.

3.8 Liaison with Other Organisations

We work closely with a number of organisations and to avoid duplication of effort we have clear guidelines on who is responsible for what.

Partners include:

- Trading Standards South East Limited (TSSEL);
- Feed and Food related working focus groups across the Thames Valley and South East;
- National feed programmes across neighbouring areas delivered on behalf of the FSA;

- Public Health Teams to deliver healthy eating initiatives and alcohol reduction;
- Schools for the delivery of the nutrition education programme (Key Stage 1 and 2);
- National Agency's where cross cutting issues are identified such as the Food Standards Agency, Environment Agency, Police, Social services and Educational establishments;
- Members of Bracknell, West Berkshire and Wokingham Councils on PPP Workplan and Priorities;
- The Public Protection Manager is a member of the National Feed Governance Group on behalf of National Trading Standards.

3.9 Feed and Food Safety and Standards promotional work and other non-official Controls and Interventions

The principles of Prevention, Intelligence and Enforcement (PIE) are applied to this plan. The promotion of food standards and feed safety will be achieved through local initiatives, publicity and by supporting national initiatives. The PPP will aim to deliver through its programme delivery a number of projects including:

- Contributing to the wider public health agenda through the promotion of healthier eating options;
- Raise awareness of food issues to local food businesses and residents;
- Maintain endorsement of the Food Hygiene Rating Scheme;
- Provide advice to local business at the time of routine visits about upcoming changes to legislation, with specific focus on allergens and on-line sales;
- Ensure that the effectiveness of promotional activities are evaluated via feedback from businesses and the public;
- Make use of the many guidance leaflets for business on feed and food topics. For example, those that are available to download from www.businesscompanion.info and from the FSA;
- Implement the PPP communication strategy and further develop the PPP website and use of social media potential;

- Attendance to community fairs to promote the work of the PPP.

4.0 Resources

4.1 Financial and Staffing Allocation

Our primary resources are our staff. There are some 100 staff operating across the PPP within the 4 functional areas. The resources at the PPP disposal are diverse and range from support officers with administrative, intelligence and analytical database skills, trading standards officers, sampling officers, specialist in feed and food hygiene officers (e.g. approved premises, animal health), food safety officers, environmental health officers, solicitors, and a technically qualified leadership and management team.

Clearly, not all staff are dedicated to delivering solely on feed and food hygiene and standards. However, all play a part in its delivery. The delivery programme ensures services are carried out by officers with the correct levels of qualification, skills and expertise, as set out in the Practice guidance on official controls.

There is little scope at present to recover costs associated with such planned activity. However, the FSA provide a small grant fund, around £12k for the delivery of regional feed inspections. The PPP also recover costs for its primary authority role and specifically in relation to its commitments to Waitrose and Prezzo. The PPP also place a charge for export certification on request. This amounts to a further approximation of £15.5k per annum. There is a £20k sampling budget from the PPP.

4.2 Staff Development Plan

The PPP have always supported learning and development within its disciplines. This ethos being expanded to ensure future proofing and expansion of technical skills that allow the service plan to become more accessible to colleagues within the partnership. The PPP also encourages staff development and building on core qualifications using structured annual appraisals, audit of skills and regular one to one meetings.

The PPP Joint Management Team have developed, and recruited, a new lead officer role responsible for building on an already established skills framework (as set out by the FSA) to ensure competency amongst staff involved in service delivery is maintained and embedded across all of the PPP. This will incorporate better use and understanding of systems database, and application of regulatory skills and legal processes aimed at minimising risk to prosecution cases. This will also include maintaining minimum continued professional development i.e. at least 10 hours in core subject area, and no less than 20 hours overall annually.

5.0 Quality Assessment

5.1 Quality assessment and internal monitoring

The PPP have the resource in place to ensure:

- Regular Internal audit and monitoring of database quality across the three case management systems;
- Performance targets within the Governance arrangements, which in turn support many of the service delivery ambitions within the plan. For example, customer business satisfaction;
- Qualified and competent senior investigating officers assisting investigators preparing files for prosecution;
- A system of ensuring calibration and maintenance for relevant recording equipment. For example, annual thermometer equipment calibration;
- A growing quality management systems specific to feed and food matters, including an enforcement manual;
- Ensuring sample analysis is carried out only by laboratories that are accredited and appointed for the purpose of the various statutes; and
- Established target setting through 1;1's and appraisals.

6.0 Review

6.1 Review of Delivery Plan

The PPP will review the plan, at the end of the financial year, as part of the overall service planning process to ensure it continues to meet the needs of our customers.

6.2 Identification of any variation from the Delivery Plan

Variations from the plan will be reviewed at regular tasking meetings with management. Variances will be documented. If changes are made they would be subject to final agreement by the Public Protection Manager under delegated authority.

6.3 Areas of Improvement

Areas for improvement are incorporated into the following year's objectives, or dealt with as soon as possible if there are no additional financial implications. Identified areas include:

- Ensuring that intelligence reports from sources such as the FSA direct our audit and intervention programme;
- Continue to improve the quality of data management by committing to a single database;
- Ensure any new system is in line with GDPR rules and recognised industry standards for the protection of all PPP stakeholders;
- Improve and promote communications by reviewing and implementing the PPP communication strategy;
- Ensure robust contingency planning by reviewing the PPP plans concerning emergency planning and business continuity;
- Prioritising potential High and Medium risk along with new unrated premises;
- Develop further a documented process / procedure for the internal monitoring in line with the Code of Practice; and
- To revisit how the delivery of the PPP model can be better applied in delivering services to all stakeholders signed up to the inter authority agreement, and improve accordingly.

APPENDIX: Relevant Officers

[Link to structure chart.](#)