



**Caerphilly County Borough Council
Economy & Environment Directorate**

**PUBLIC PROTECTION
FOOD ENFORCEMENT SERVICE PLAN
RECOVERY
2022/2023**

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Food Enforcement

FOOD ENFORCEMENT SERVICE PLAN - 2022/2023

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FOREWORD

A decision was taken by the Corporate Management Team during February 2020 to redeploy Public Protection staff to respond to the pandemic. Therefore, proactive food safety, hygiene and standards interventions were suspended and delivery against the plan for 2019/20 was not completed. Additionally, Food Law Enforcement Plans for 2020/21 and 2021/22 were not produced as officers continued to be redeployed to Covid Control.

Senior Managers therefore agreed that a review against the last produced plan (2019/20) would be outdated, and the resources better utilised for delivering against this plan for 2022/23. A formal review will next take place in 2023.

It should be noted that the inability to achieve all targets within the 2019/20 plan is not a failure of the collective food service. A risk-based decision was reached not to complete the targets within the plan, but to respond to the call from Welsh Government and Public Health Wales to redeploy relevant officers to the pandemic response.

It should also be noted that many premises ceased trading, and some closed during lockdowns and therefore did not require an inspection or intervention.

The transition to recovery has commenced. Officers are working towards the FSA Recovery Plan and targeting higher risk establishments and new businesses as well as where information/intelligence suggests that risks have increased/standards have fallen or if an establishment is otherwise considered a priority for intervention due to the risk posed. Businesses impacted by the new requirements on allergen labelling for products prepacked for direct sale, that apply since 1 October 2021 are also considered.

Early indications demonstrate that conditions have deteriorated, possibly because of not being inspected for over two years and some food business operators taking short cuts to save money during times of financial hardship. Businesses also require additional support to comply with new allergen regulatory requirements. As such it is taking longer to conclude inspections, letters, reports, notices and in some cases formal Investigations have been necessary. This suggests that self-regulation has not been effective and such evidence will be vital to assessing the appropriateness of the FSA's proposed ABC programme and a move towards self-regulation.

CAERPHILLY COUNTY BOROUGH COUNCIL FOOD ENFORCEMENT SERVICE PLAN

1. SERVICE AIMS & OBJECTIVES

1.1 Introduction

This local authority has a statutory duty to enforce the Food Safety Act 1990 and The Food Hygiene (Wales) Regulations 2006.

The Food Standards Agency has a key role in overseeing local authority enforcement activities in respect of food matters and has issued guidance on the annual production of food enforcement service plans by local authorities.

The Agency has been proactive in setting and monitoring standards and will continue to undertake an auditing role in respect of food enforcement activities.

This is the Food Enforcement Service Plan produced by Caerphilly County Borough Council for the financial year 2022/2023.

The plan is approved under delegated powers by the Cabinet Member for Planning & Public Protection on recommendation from the Head of Service. It is compiled on an annual basis and a review against the programme is carried out quarterly and at the end of the year.

In producing this plan, the authority has sought to develop a range of strategies, activities and interventions that ensure a balanced approach to service delivery. This 'enforcement mix' seeks to balance the need for proactive intervention programmes with the need to promote, educate and inform both business and the public.

1.2 Aims & Objectives

The Service's Statement of purpose is:

"To protect and improve the social, economic, environmental, and cultural wellbeing of our communities".

One of the Service's key objectives is:

“Proportionate and targeted enforcement, education and advice that prevents harm to public health and safety and protects consumer and business interests by promoting a fair trading environment”.

The Service contributes to the 4 national enforcement priorities for Wales published by Welsh Government:

- protecting individuals from harm and promoting health improvement
- ensuring the safety and quality of the food chain to minimise risk to human and animal health
- promoting a fair and just trading environment for citizens and business
- improving the local environment to positively influence quality of life and promote sustainability

The Well-being of Future Generations (Wales) Act 2015 is about improving the social, economic, environmental and cultural well-being of Wales. The Act sets out seven Well-being Goals showing the kind of Wales we want to see.

This service area specifically links into the following National Well-being Goals:

- A prosperous Wales
- A globally responsible Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities

Having regard to the five ways of working set out in the sustainable development principle, as defined in the Act, our proactive inspection and surveillance programmes are focussed on preventing harm to public health and safety. We enforce legislation to protect consumer and business interests to promote a safe and fair trading environment, but also advise and educate both business and the public; collaborating with them to promote compliance and improve standards over the long term.

1.3 Links to Corporate Priorities

The 5-year 'The Caerphilly We Want 2018-2023' commenced from May 2018 and in support of this, the new local authority Well-being Objectives have been developed and encompassed within a new style corporate plan to run on the same timeline; 2018-2023.

The service area links into the following Well-being Objectives:

- Well-being Objective 1 - Improve education opportunities for all
- Well-being Objective 5 – Creating a County Borough that supports a Healthy Lifestyle in accordance with the Sustainable Development Principle within the Wellbeing of Future Generations (Wales) Act 2015
- Well-being Objective 6 – Support citizens to remain independent and improve their well-being

The main food enforcement activities that link with these priorities are:

- Risk-assessed food intervention programmes
- Welsh Food Hygiene Rating Scheme
- Food sampling programmes
- Investigation of food complaints
- Food Hygiene and Standards Service Requests
- Consumer information and education
- Trader information and education
- Provision of training for food safety management and food standards
- Food sampling projects
- Special food projects, surveys etc.
- ‘Primary Authority/Home Authority’ principle
- Investigation of communicable disease
- Food fraud investigations

2. BACKGROUND

2.1 Profile of the Local Authority

Caerphilly County Borough Council is the fourth largest authority in Wales and stretches from the Heads of the Valley in the north to Risca and Caerphilly near the M4 corridor in the south, a distance of some 40 kilometres. The county borough has over 50 distinct towns and villages. The larger settlements include Caerphilly, Blackwood, Newbridge, Bargoed, Ystrad Mynach, and Risca. The Council provides services for 180,795 people who live in an area covering 278km².

Of the Council’s 110 Lower Super Output Areas (LSOAs), 67% are in the top 50% most deprived LSOAs in Wales. 13 of the Council’s LSOA’s feature in the top 10% most deprived category. There is a concentration of more deprived LSOAs in the north of the county borough, along with smaller pockets elsewhere, particularly around Caerphilly town.

There are approximately 1664 registered food premises within the borough in which food or drink is manufactured, processed, stored or sold.

2.2 Organisational Structure

2.2.1 Member Structure

The Council has adopted a Cabinet style of Local Government, based on a Leader and Cabinet model. The current Cabinet consists of:

- Leader of Council
- Deputy Leader of Council and Cabinet Member for Prosperity, Regeneration and Climate Change
- Cabinet Member for Planning & Public Protection
- Cabinet Member for Corporate Services and Property
- Cabinet Member for Housing
- Cabinet Member for Education & Communities
- Cabinet Member for Highways & Transportation
- Cabinet Member for Social Care
- Cabinet Member for Waste, Leisure & Green Spaces
- Cabinet Member Finance & Performance
-

The Cabinet has responsibility for Food Safety and Food Standards enforcement.

The Environment and Sustainability Scrutiny Committee oversees the Food Safety enforcement and infectious diseases and the Trading Standards function.

2.2.2 Directorate Organisation

A corporate management team led by the Chief Executive and three Directors undertake the day-to-day management of the council. Council services are provided by the three Directorates of Social Services and Housing, Economy and Environment, and Education and Corporate Services.

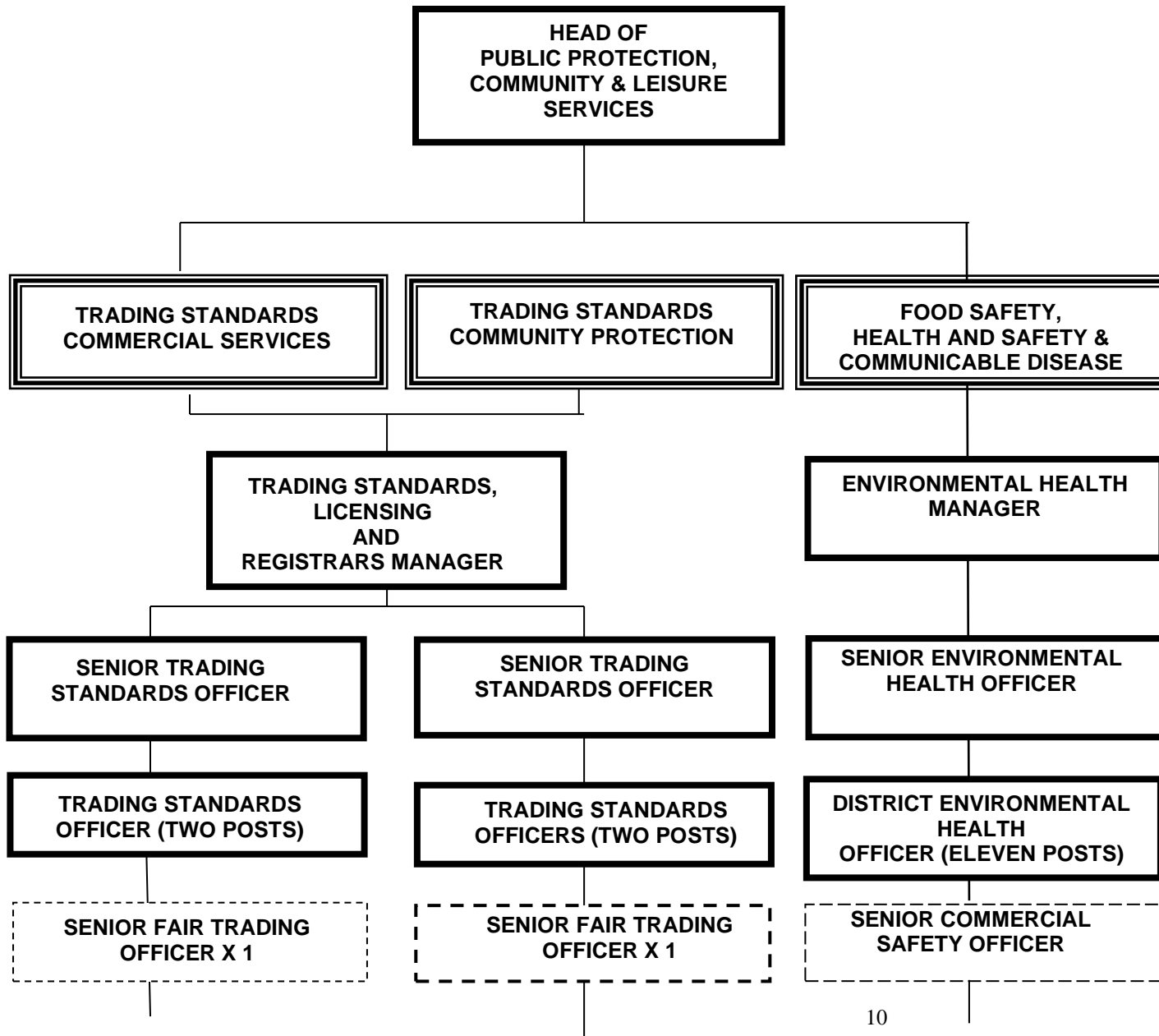
Public Protection, which includes Environmental Health and Trading Standards Services, reports within the Economy and Environment Directorate. The Head of Public Protection, Community and Leisure Services has delegated responsibility for all matters relating to Food Safety and Standards.

Individual post holders have been given direct delegation to take any action and exercise functions in relation to the Food Safety Act 1990, European Withdrawal Act 2018, The Food Hygiene (Wales) Regulations 2006 (and other appropriate legislation). Certain officers have been authorised by the Food Standards Agency under the Food and Environment Protection Act 1985.

Food enforcement activities are carried out by Environmental Health Officers in the Food Safety Team and Trading Standards professionals within the Commercial Services and Community Protection Teams. The structures of the three enforcement teams are shown in *Figure 1* overleaf.

Figure 1

Structure of Food Law Enforcement



**SENIOR FAIR TRADING
OFFICER X 2**

**SENIOR FAIR TRADING
OFFICER X 1**

**COMMERCIAL SAFETY
OFFICER**

FAIR TRADING OFFICER X 2

FAIR TRADING OFFICER X 3

TECHNICAL ASSISTANT



**DENOTES OFFICER
COMPETENT & QUALIFIED FOR
VARIOUS ASPECTS OF FOOD
HYGIENE OR FOOD
STANDARDS
SNR COMMERCIAL SAFETY
AND COMMERCIAL SAFETY
OFFICER CARRY OUT THE
FOOD SAMPLING FUNCTION**

2.2.3 External Services

The following provide specialist services:

- **Food Analysts**

Two Public Analyst Services provide chemical and physical analysis, examination of food, sampling, labelling advice and expert opinions:

- Public Analyst Scientific Services, Valiant Way Wolverhampton WV9 5GB
- Minton Treharne & Davies Ltd **Forest Farm Industrial Estate, Longwood drive, Cardiff, CF14 7HY**

- **Food Examiners**

Bacteriological examinations of food samples and food complaints are provided by:

- Public Health Wales – Cardiff Laboratory, Llandough Hospital, Penlan Road, Penarth, Vale of Glamorgan, CF64 2XX, Tel No.029 20715298

- **Specialist Contractors:**

- Employed as and when required

2.3 Scope of the Food Service

The Food Safety and Trading Standards Teams are responsible for undertaking the following work activities:

- A programme of food hygiene and food standards interventions
- Carrying out interventions/re-visits between programmed interventions where significant contraventions are found or following the receipt of intelligence or complaints
- Enforcement activities such as warnings, formal notices and closures, simple cautions, and prosecutions in line with the Public Protection Enforcement Policy
- Collection and submission of intelligence on food incidents and criminal activity involving food
- Implementing food sampling programmes (microbiological, compositional & labelling)

- Proactive projects and surveys
- Providing advice and assistance to local businesses to assist them to comply with food legislation
- Investigation of complaints and responding to service requests
- Investigating suspected and confirmed cases of communicable disease including food poisoning in liaison with the Consultant in Communicable Disease Control (CCDC)
- Responding to Food Standard Agency Food Incidents and Alerts as appropriate
Examination of and responding to planning and licensing applications in relation to food premises where appropriate
- Providing and reviewing systems and procedures in line with FSA Framework Agreement
- To act as Primary/Home Authority and implement Service Level Agreements where appropriate
- Implementation of the Welsh Food Hygiene Rating Scheme

2.4 Demands on the Food Service

2.4.1 Food Premises

The Table in section 3.1 shows the number and type of premises in the county borough area.

2.4.2 Approved Premises

The Food Safety team is responsible for the approval and inspection/audit of product specific premises. These premises manufacture high-risk foods such as meat and dairy products, which are then sold to retailers or caterers. The Authority has 11 such establishments, which require a considerable amount of officer time. Of these 11, 4 are primarily approved for meat products, 1 for meat preparations, 1 for dairy products, 2 for egg packing and 3 as a cold store. Involvement includes home authority referrals, food complaint investigations, advisory visits, inspections/audits and revisits.

2.4.3 Major Manufacturers

In addition to the approved premises there are two other large food manufacturers in the County Borough who produce bread and dried snacks. There are also 16 smaller manufacturers producing a variety of food products.

2.4.4 Importers

There are two importers located in the County Borough.

2.4.5 Seasonal Variation

One farm undertakes seasonal slaughter of poultry, mostly for the Christmas trade.

A number of large outdoor events take place annually within the borough e.g., the Food Festival and the Big/Little Cheese. These events involve a considerable input from both teams.

2.4.6 Cultural and Ethnic Diversity

The number of food premises in the county borough whose first language is not English is relatively low, although the exact figure is unknown. Translated versions of several business advice leaflets and Safer Food Better Business are also available, and translation of further information is available on request. Businesses are also signposted to a free online multilingual allergen resource available in 13 languages hosted on the Chartered Institute of Trading Standards (CTSI) website.

2.4.7 Service Delivery

All aspects of the food service are based in Penallta House, Tredomen Park, Ystrad Mynach, CF82 7PG. The food service is available during office hours from 8:30a.m.

to 5:00p.m. Monday to Thursday and 8.30a.m. to 4.30p.m. Friday. Outside office hours the authority operates a 24-hour emergency service. In addition officers conduct unannounced visits and investigations at hours other than those listed above.

The Caerphilly County Borough Council website provides information on the services provided. There is information for businesses, details of the Enforcement Policy, Food Service Plan, and Food Hygiene Rating Scheme.

The Website address is:

www.caerphilly.gov.uk

Complaints relating to food can be made via the internet or at:

foodhealthsafety@caerphilly.gov.uk

or

tradingstandards@caerphilly.gov.uk

2.5 Enforcement Policy

The Public Protection Service has adopted an overarching Enforcement Policy for its regulatory function. It has full regard to the Regulators Code. A copy of the Policy may be found at www.caerphilly.gov.uk

2.6 Food Sampling Policy

The Food Safety and Standards teams have a joint Food Sampling policy. The policy takes into account the various reasons for undertaking sampling programmes and the different types of sampling methods to be deployed.

The Head of Public Protection, Community and Leisure Services who has delegated powers for enforcement matters relating to Food Safety & Standards, has approved the policy.

3. Service Delivery

3.1 Food Premises

The Food Law Code of Practice (Wales) gives food authorities the option of using different types of interventions in specific circumstances. Interventions are defined in the Code as activities that are designed to monitor, support and increase food law compliance within a food establishment, they include, but are not restricted to, “official controls” as defined in retained Article 2(1) of Regulation EC 882/2004.

Official controls that may be used include inspections, partial inspections, audits, surveillance, verification, monitoring and sampling visits.

A risk-based approach to food safety has been adopted. All food safety high risk premises receive a full inspection/audit in order to attain the targets set locally and in order to issue a food hygiene rating to the business. Low risk premises could be subject to an inspection or an alternative intervention depending on whether they fall into the scope of the food hygiene rating scheme. New businesses will be risk assessed in order to prioritise the high risk ones for inspection. There is only one National PI for food safety for 2022/23 - the percentage of food establishments which are ‘broadly compliant’ with food law.

The Food Safety Team operates the Welsh Food Hygiene Rating Scheme which made it mandatory for businesses to display the hygiene rating awarded to the business from 28th November 2014. All businesses within the scope of the scheme are issued with a food hygiene rating following an unannounced inspection.

The team also offers assistance to businesses with poor food hygiene ratings. This is in the form of coaching/training visits to help them improve their practices and develop a food safety management system, which in turn should improve the food hygiene rating awarded.

Food Standards interventions are carried out by food qualified officers in the Trading Standards Service. This year the focus is to concentrate on the Recovery plan milestones. Trading Standards is a high demand, responsive front-line service and is still fielding competing priorities as a result of the pandemic. As such there may be times when service delivery deviance is necessary, for example where resources are diverted towards intelligence led enforcement, major incidents affecting the service, special projects and criminal investigations.

The demands on the food service vary from year to year as premises open and close. A breakdown of the categories of food premises located within the county borough, subject to food law regulation (as at 1st April 2022) is provided overleaf.

Categories of Food premises trading within Caerphilly County Borough 2022/23

Premise Type	Food Hygiene	Food Standards
Primary Producers	11	14
Manufacturers/Packers	44	44
Importers/Exporters	2	2
Distributors/Transport	23	21
Supermarket/Hypermarket	35	35
Small Retailers	253	253
Retailer/Other	79	79
Restaurant/Café/Canteen	204	204
Hotel/Guest House	12	12
Pub/Club	226	226
Takeaway	191	191
Caring Premises	239	239
School/College	95	95
Mobile Food Unit	490	490
Restaurant/Caterers Other	195	195
Total	2099	2100

3.2 Food Safety & Hygiene Interventions

The interventions due for 2022/23 are shown below:

The interventions will be delivered against the milestones set out in the FSA Recovery Plan.

Risk Scored Interventions

Category	Frequency	Total No of Premises	Interventions due	FSA Recovery Plan Expectations
A	6 months	3	6	6
B	12 months	59	59	59
C	18 months	691	601	601
Total high risk		753	666	666
D	2 years	186	172	4 Non-broadly compliant
E	interventions every 3 years or Alternative Enforcement Strategy	571	514	
Total low risk		757	686	4
Outside programme		446	-	
Unrated		177	177	
Total other		623	177	-
Total		2133		

Inspections are grouped geographically for reasons of economy. There are currently 11 Approved food establishments within the county borough. Of these 11, 2 are approved for Egg Products, 1 for Dairy Products, 3 as cold stores, 1 for Meat Preparations and Meat Products and 4 for Meat and Fish Products.

Deviation from the programmes outlined above, may occur in response to major food incidents e.g. food poisoning outbreaks/incidents, food fraud investigations; special projects referred from the Food Standards Agency; new legislation etc.

In order to determine whether a revisit is necessary, consideration will be afforded to:

- a) The number and seriousness of the offences,
- b) The willingness of the proprietor to comply,
- c) Issues related to public health protection, and
- d) Premises awarded a FHR score of 2 or less

3.3 Food Standards Interventions

Food Standards interventions establish whether legal requirements covering quality, composition, labelling, presentation, advertising and materials or articles in contact with food are being met. They also aim to detect any illicit food fraud activity.

A risk-based approach to Food Standards has been adopted in respect of all businesses. The service seeks to promote a consistent and effective approach to regulatory intervention and enforcement. It focuses on prevention rather than cure and is proactive in taking firm action against those who flout the law, act irresponsibly, or where there is an immediate risk to health and safety.

This year interventions will be prioritised in accordance with the Food Standards Agency Recovery Plan. Food Standards 'High' risk rated premises will receive a full inspection and 'new businesses' are a priority for intervention. Premises that may supply products prepacked for direct sale will also be a consideration to assess the impact of new allergen labelling requirements that came into force in October 2021. Where resources are available, we aim to undertake interventions at lower risk establishments prioritising these interventions in accordance with the Code of Practice and taking account of the of the flexibilities regarding the type of intervention carried out.

The Food Standards risk scored interventions due as at 1st April 2022 are shown overleaf as well as the expectations as specified in the FSA Covid-19 Local Authority Recovery Plan.

Food Standards Risk Scored Interventions due on 1st April 2022

Risk Profile	Frequency	Total No of Premises	Interventions due	FSA Recovery Plan Expectations
A (High)	At least every 12 months	12	12	12
B (Medium)*	At least every 24 months	563	440	-
C (Low)*	Alternative Enforcement Strategy or intervention every 5 years	974	520	-
		1549	972	
Outside programme		446		
Unrated		106	106	>106
Total other		552	106	
Total		2101	1078	

*Where an establishment is considered a priority due to the risk posed or because of the new requirements on allergen labelling for food prepacked for direct sale they will also receive an intervention.

3.4 Food Hygiene - Primary Production (Food Standards)

Retained EU Regulation (EC) No 853/2004 on the hygiene of foodstuffs is aimed at ensuring the controls throughout the food chain are strengthened. Food hygiene at primary production level is enforced as part of the Food Standards function. In practice Animal Health Officers who are appropriately qualified enforce this legislation during interventions at agricultural premises.

3.5 Food Safety & Hygiene Requests for Service (Food Complaints)

Requests for service in relation to foodstuffs are investigated in accordance with the Food Complaints procedure and the Food Law Code of Practice (Wales). Caerphilly County Borough Council acts as home authority to several food manufacturers located within the area and therefore investigates complaints allegedly arising from those premises, very often on behalf of other local authorities. Food complaints are also investigated when they are linked to other premises within the county borough. Complaints relating to the hygiene of food businesses are also investigated.

Details of all requests for services are recorded on the APP database.

It is anticipated that in excess of 125 requests for service regarding foodstuffs and food hygiene will be received annually.

In addition, circa 90 advisory visits are conducted annually to a variety of businesses to advise on layout & design and food safety practices and procedures.

3.6 Food Standards Complaints & Service Requests

Complaints and Service Requests regarding Food Standards are recorded on the APP database.

Food Standards complaints are actioned in accordance with the service's policies and procedures outlined in the Quality manuals and the Food Law Code of Practice (Wales).

Response to complaints is reactive and dependent on those received. It is estimated the Food Standards service will deal with between 40 and 50 complaints based on recent year's trends.

The Food Standards service also responds to requests from Food Business Operators for advice and guidance to assist them comply with the plethora of food standards legislation. The requests are wide ranging and vary in content and complexity.

3.7 Primary/Home Authority Principle

This authority is committed to the Primary/Home Authority Principle and acts as Home Authority for 8 food manufacturers in the county borough. Five of these businesses have signed formal Home Authority Agreements. These are recognised as Proactive Home Authority companies.

Other food businesses in the area are not formally recognised as Home Authority businesses but the authority will act as Home Authority in relation to requests for service from either the company or another enforcement authority. These are recognised as Reactive Home Authority businesses.

The proactive agreements specify that meetings will be held with company representatives at least once a year, or when necessary, in order to provide up to date guidance, advice on new legislation or emerging trends, etc.

The Authority will consider participation in the Primary Authority Scheme if approached by a business. To date the Authority has not been approached by any businesses.

3.8 Advice to Business

This authority responds to all requests for service and information which is provided free of charge. Officers endeavour to provide the best and most current information available.

The website provides information for the public and traders at:

www.caerphilly.gov.uk

When new legislation and guidance etc. is made available, information is provided to the most appropriate target groups by the most effective means, e.g., trade seminars, mail shots, e-mails, press releases and social media etc.

Food Safety & Hygiene

Information and advice on food safety and hygiene is given during every food safety intervention. Inspection reports are provided following every intervention, and in addition to detailing contraventions and legal requirements, information is also supplied relating to best practice advice.

Every opportunity is taken to promote the introduction and use of HACCP within food premises. Food business operators (FBOs) are given the option of utilising various Food Safety Management Systems including Safer Food Better Business (SFBB).

Information is made available for businesses to access training courses, such as the level 2 and 3 food hygiene courses, run by local service providers.

Information and advice on the Food Hygiene Rating Scheme is provided to businesses during interventions and details are also available on the website. New businesses are also provided with information when they submit a food registration. Businesses that have been awarded a 5 Food Hygiene Rating are promoted via social media.

It is anticipated that circa 250 requests for advice on food safety will be received annually.

Food Standards

Information and advice on Food Standards is also routinely given during Food Standards interventions and officers provide inspection reports after each official control visit. The report includes the outcome of the official food control, identifies non-compliances as well as advice and guidance.

Businesses are also signposted to various sources of information, including Trading Standards Wales, FSA guidance and training resources, the Business Companion, CTSI and ZERO2FIVE Food Industry Centre, at Cardiff Metropolitan University who provide food and drink businesses with technical, operational and commercial support.

Trading Standards continues to receive requests for service in relation to Food Standards. This ranges from simple enquiries to those that require complex, technical advice. The service advises major manufacturers, multi nationals, small/micro businesses that trade from home, on-line and at temporary events as well as internal CCBC Catering Services. The advice required is often of a complex and/or novel nature.

3.9 Food Safety & Hygiene Sampling

Sampling undertaken by the Food Safety Team (both surveillance and targeted) is undertaken to protect public health and to improve the microbiological quality of food.

The sampling programme includes:

- a) Welsh Food Microbiological Forum programmes;
- b) Approved premises;
- c) UKHSA/PHW programmes;
- d) Risk based sampling;
- e) Intelligence lead;
- f) Imported foods.

The proactive sampling programme is based on a monetary allocation from Public Health Wales. Caerphilly has an allocation of £13,525.

The Food Safety Team plays an active role in the Welsh Food Microbiological Forum. The Forum's main strengths are the ability to produce a co-ordinated food-sampling programme for the whole of Wales, which allows standardisation of protocols, pooling of data and the sharing of information derived from it.

Programmed sampling is undertaken weekly unless circumstances dictate otherwise. Adverse sample results will require follow-up visits/action.

Samples in connection with complaints and alleged outbreaks of food poisoning may be submitted to the laboratory at any time.

Microbiological samples are submitted to a Food Examiner at Public Health Wales, Cardiff Laboratory. Extraneous matter and chemical etc. samples are submitted to the Public Analyst.

It is anticipated that the service will sample in excess of 450 products in 22/23. A sampling plan outlining the workload for 2022/23 has been devised, and is attached at Appendix 1. The samples originating from complaints are totally responsive and therefore the estimated figure of 5 is based on previous year's trends.

3.10 Food Standards Sampling

Food Standards sampling (both initiative and targeted) is undertaken to ensure food is safe and it is what it says it is.

The sampling programme includes:

- FSA/Trading Standards Wales/Regional Food Group projects
- Home Authority samples
- Intelligence led, risk-based initiative samples
- CCBC Catering/Procurement samples
- Imported food as and when identified

Non-programmed samples (complaint/initiative samples) are submitted to the Public Analyst periodically. In some circumstances it may be necessary for samples to be examined by an independent expert. The samples originating from complaints are responsive and are taken in accordance with the officer's professional judgement.

Screening samples are routinely taken to check compositional or labelling claims, particularly for alcohol authenticity during the inspection of licensed premises.

Adverse sample results could result in the following action:

- Trader advice and guidance
- Primary Authority/Home Authority referral
- Further sampling activity and/or enforcement action

Any pursuant investigation is conducted in accordance with the authority's Quality manuals and Enforcement Policy.

A Food Standards Projects/Survey and Sampling Plan which outlines the planned Sampling activity for 2022/23 is attached at Appendix 2.

3.11 Control and Investigation of Outbreaks and Food Related Communicable Disease

The authority has an Outbreak Control Plan that follows the framework established in the Wales Outbreak Control Plan agreed by the Directors of Public Protection Wales. The national plan was updated in 2020 to incorporate procedures applicable to Covid Control. The National plan will be reviewed in 2023 with a light touch review undertaken in the summer of 2022; an Officer from Caerphilly CCBC is on the review panel. The Caerphilly Plan will be revised and updated later in 2022 to ensure it is aligned to the national plan.

The Head of Public Protection, Community and Leisure Services has responsibilities for the Communicable Disease Control and Outbreak Control functions, though in practice this function is devolved to the Environmental Health Manager/Senior Environmental Health Officer/Lead Communicable Disease Officer and the Food Safety Team. The Authority has a Lead Officer for Communicable Disease who attends the Lead Officer training programme; additional officers also attend the training when places are available.

This authority investigates all reported cases of confirmed and suspected food poisoning. Appropriate arrangements are in place to liaise with health authorities and other related agencies. This authority receives notifications via Tarian and additionally direct from GP surgeries, and members of the public. All case records are recorded on the Tarian database.

All reported cases are investigated by officers via telephone conversations/ visits with the exception of Campylobacter, which is conducted via a postal questionnaire.

It is anticipated that circa 366 notifications of communicable disease will be received and investigated annually.

3.12 Food Safety Incidents

All food officers have access to the Internet and e-mail facilities. Contact details for all officers have been forwarded to the Food Standards Agency, thus allowing direct communication for the distribution of food alerts etc.

If Officers suspect or have confirmed that a food incident is likely to, or has originated from within the county borough, appropriate action will be taken in line with the Food Incidents and Hazards procedure.

Food Alerts for Action and details of the action taken are retained.

It is anticipated that the authority will receive in the region of five food incident notifications annually that require action.

Both the food hygiene and standards teams take allegations of food fraud seriously and will undertake investigations as necessary. Any intelligence received is recorded and disseminated to the National Food Crime Unit. The authority has also signed up to the Memorandum of Understanding between the DPPW and the National food Crime Unit.

3.13 Liaison with Other Organisations

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

Two Panels deal specifically with food issues, the Food Safety Expert Panel and the Wales Food Standards and Labelling Group. The authority is represented on the Food Safety Expert Panel, the Welsh Food Microbiological Forum (WFMF) and the Trading Standards Wales Food Standards and Labelling Group. Officers also actively participate in the South-East Wales Food Safety Task Group, FHRS Steering Group, the Greater Gwent Food Group. Food officers also attend the South-East Wales Communicable Disease Liaison Group and the Communicable Disease Expert Panel.

Close liaison is maintained with the Food Standards Agency (FSA), the Public Analyst, Public Health Wales, and the Communicable Disease Surveillance Centre (Wales).

Officers also liaise with other organisations such as the National Food Crime Unit, Home Office Immigration, Aneurin Bevan Health Board and the Care and Social Services Inspectorate (Wales) when necessary.

Formal consultation networks are established within the Authority in respect of both planning and building control, ESAG and licence applications including Street Trading and TENS.

3.14 Food Promotion

- Food Safety Officers will continue to target caterers regarding the importance of Food Safety Management systems.
- Food Safety Officers will continue to promote and participate in the Food Hygiene Rating Scheme.
- The teams will participate in Food Safety and Allergy Awareness weeks.

- All officers will continue to promote awareness and understanding of the law relating to food allergies. This includes mailshots, distributing multilingual posters and signposting persons to allergen guidance and online resources.
- Both teams will continue to post information on the Caerphilly website, Facebook and Twitter, and publish timely and topical articles in the Caerphilly “Newslines” and local press including the results of any prosecutions.
- Opportunities are taken, whenever possible, to promote food hygiene, food standards and healthy eating. This is achieved by distributing information including leaflets and posters and signposting people to on-line materials and training resources.
- Talks on food issues to individual organisations and groups will be undertaken upon request.

If any food promotion activity is carried out we will consider carrying out an appropriate evaluation of that project to assess its effectiveness.

4. Performance Management

4.1 Measuring Performance

The Food Safety and Trading Standards teams have developed the following robust performance management system:

- Monitoring of performance against this plan is reported quarterly via the Directorate Performance Report.
- Prior to the pandemic monitoring of Food Standards performance was reported quarterly at Trading Standards Management Team meetings. This will be reinstated for the financial year from 2022/23.
- Setting targets for improvement, against the Environmental Health Practice Standards and the Welsh Local Performance Indicators is routinely undertaken. Benchmarking against practice standards will not be undertaken during 2022/23.

- A programme of Personal Development Reviews, which are carried out annually for all staff via the “My Time Extra” review meetings and exchange of forms.

4.2 Benchmarking

Performance Indicators

Benchmarking exercises will not be undertaken during 2022/23. All available resources will be targeted towards delivering the Recovery Plan.

The National Strategic Indicators for Wales for 2021-22, PPN/009 – the percentage of food premises that are broadly compliant places Caerphilly’s performance at 86%.

This is a reduction from the previous report of 96%.

5.1 RESOURCES

Additional budget to increase staff resources in Environmental Health and Trading Standards Teams has been provided from 2022/23. This has resulted in an increase in the Environmental Health resource associated with delivering this plan but not in relation to Food Standards. The latter new officers are not food qualified. Estimated staff resources are as follows:-

The total FTEs are provided:

Food Safety: 7.4 FTE

Communicable Disease 2.5 FTE

Food Standards 3.5 FTE

5.2 Financial Estimates

Food Standards

Trading Standards Officers routinely carry out Food Standards interventions combined with other Trading Standards enforcement activities. Consequently it is not possible to provide an accurate breakdown of the full cost to deliver the food standards function.

The estimated financial expenditure on Food Standards enforcement is £166,912
The figures include on-costs, travelling allowances and sampling costs.

The total estimated financial expenditure for food law enforcement for 2022/23 is:

	£
Food Safety & Hygiene	556,225
Trading Standards	<u>166,912</u>
TOTAL	723,137

5.3 Staffing Allocation

The Food Teams comprise of the following officers:

Food Safety

Post Title	EHORB Registration	Food Safety Experience
Team Leader EHO	1993	25
District EHO	1994	28
District EHO	1991	25
District EHO	2000	15
District EHO	2000	22
District EHO	2004	18
District EHO	2005	17
District EHO	2010	12
District EHO	2019	18 yrs experience as previously sampling officer
District EHO	-	Newly qualified
District EHO	-	Newly qualified
District EHO	1995	14

Food Standards

Post Title	Food Qualified	Food Standards Experience (Years)
Senior TSO	1995	27
Senior TSO	1993	29
TSO	2007	15
TSO	2007	15
TSO	2007	15
TSO	2021	1
SFTO	1995	27
SFTO	1995	13
SFTO	2005	17

5.4 Training

All officers will receive adequate and relevant ongoing training in order that they achieve the required hours CPD as specified in the Food Law Code of Practice. Training needs will be determined through annual officer Personal Development Reviews via My Time and My Time Extra reviews.

Both the Food Safety Expert Panel and the Food Standards and Labelling Group routinely advise the FSA of officer training requirements.

6. QUALITY ASSESSMENT

6.1 Quality Systems

There are currently 3 quality systems in operation, which aim to define and control the enforcement of food in the county borough, one for Food Safety and two for Food Standards.

The Quality systems follow an ISO 9002 style, but are not accredited. The systems were externally audited by the Food Standards Agency in January 2016.

The quality systems include:

- Policies/procedures
- Peer review
- Management meetings
- Management review
- Personal Development Reviews

Food Hygiene and Standards operational procedures are reviewed regularly and updated as necessary.

A new edition of the Food Law Code of Practice Wales was published and further amendments are expected to cover EU exit. This will necessitate a review of the Food Hygiene and Standards operational procedures. Work streams as a result of Achieving Business Compliance will also trigger further reviews.

7. REVIEW

7.1 Summary Review

A decision was taken by Senior Managers during February 2020 to redeploy Public Protection staff to respond to the Covid 19 pandemic. At that time Food Hygiene and Standards inspection programmes were suspended and some delivery against the Food Law Enforcement Plan for 2019/20 was not completed.

Due to the ongoing pandemic Food Law Enforcement Plans for 2020/21 and 2021/22 were not produced. A review against the 2019/20 plan has not been carried out as it is now outdated. The following provides a review of the work that has been undertaken.

As resources permitted both Food Hygiene and Standards teams aligned their priorities with the Food Standards Agency Recovery Plan and prioritised businesses that posed the greatest risk to public health and consumer protection. This included reactive work such as enforcement in the case of noncompliance, managing food incidents and food hazards and investigating and managing complaints/service requests.

Trading Standards were also able to undertake some official controls, sampling and ongoing proactive education. With support from the Food Standards Agency and Trading Standards Wales, Food Standards Officers dedicated their expertise to the development, launch and promotion of a Greater Gwent Food Group multilingual allergen resource in 9 languages. The resource is suitable for food businesses in Wales, England and Northern Ireland. It launched in September 21 and is hosted on the Chartered Trading Standards Institute (CTSI) website. It is freely available for use by all local authorities in England, Wales and Northern Ireland. The resource is also being adapted for use in Scotland.

Caerphilly Trading Standards Officers have promoted and exhibited it at CTSI Symposium 2021 and the FSA Food Hypersensitivity Perspectives and Practice – Virtual Symposium 2022. The Lead Food Officer for Standards, the project lead, was awarded the CTSI Hero award for her work in producing the resource.

Food Standards Officers have been proactive in educating and informing Food Business Operators and those who trade at Caerphilly events about new allergen labelling rules and the aforementioned allergen resource.

Early indications demonstrate that food hygiene compliance has deteriorated, possibly because of not being inspected for over two years and some food business operators are taking short cuts to save money during times of financial hardship.

It is also evident that businesses also require additional support to comply with the new allergen labelling requirements. As such it is taking longer to conclude inspections, letters, reports, notices and in some cases formal investigations have been necessary. This re-enforces the need for and the importance of face-to-face engagement with businesses to carry out official food controls.

	April	May	June	July	August	September	October	November	December	January	February	March
WFMF – Shopping Basket												
Imported Foods												
Approved Premise Food & Water Samples												

Shopping Basket – when other surveys are not running

Imported Foods – as and when identified

Approved Premise Water – 5 & Food Samples – 25 Food samples (5 from each) Peters, Brookes, Capital Cuisine, Billington Foods, Castle Dairies

Appendix 2

**Food Standards
Projects/Surveys/Sampling Plan
2022 - 2023**

Source		April	May	June	July	August	Sept	October	Nov	Dec	January	Feb	March
Ed	TS Wales Spring Training Event Allergen Presentation	X											
Ed	Development GGFG Allergen Resource	X	X	X									
Ed	CTSI Conference GGFG Allergen 4 new languages launch			X									
Ed	CTSI Conference GGFG Exhibition			X									
Ed	CTSI Conference GGFG Theatre Session			X									
Ed	CCBC Agency Worker Allergen Refresher Training				X								
Intel	Operation Opson TBC						X	X					
Intel	Allergen samples		X	X			X	X					
Intel	Vegan Claim samples					X							
Intel	Home Authority samples	X	X	X	X	X	X	X	X	X	X	X	X
Intel/Surveillance	Complaints/Initiative samples	X	X	X	X	X	X	X	X	X	X	X	X
Intel/Surveillance	CCBC Catering/Procurement samples										X		