

Report to CABINET

Food and Feed Service Plans 2015/16

Portfolio Holder: Cllr B Brownridge, Neighbourhoods and Co-operatives

Officer Contact: Helen Lockwood, Executive Director, Co-operatives & Neighbourhoods

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20th July 2015

Reason for Decision

To seek Members' approval of the 2015/2016 Food and Feed Service Plans.

Executive Summary

This report sets out the details of the proposed Food and Feed Service Plans 2015/2016.

The Food Standards Agency (FSA) seeks Elected Member approval of these plans as an important part of the process to ensure that national and local priorities/standards are addressed and delivered.

Food law enforcement covers the complete "farm to fork" process of food production and eventual service to the consumer. It includes Food Safety (unsafe food and unhygienic practices) and Food Standards (quality, composition, labelling) and Feeding Stuffs (animal feeding stuffs). Local Authorities must take account of the Government's better regulation agenda which makes clear that resources need to be targeted where they will be most effective and at the areas of highest risk.

Recommendations

Members are recommended to approve the Plans as attached at Appendix 2 and 3 of this report.

Food and Feed Service Plans 2015/16

1 Background

- 1.1 The annual Food and Feed Service Plans set out the aims, achievements and resources involved in the enforcement of food safety, food standards and animal feeding stuffs legislation.
 - 1.2 Food safety relates to hygienic production of food to prevent food poisoning; food standards relates to the quality and labelling to prevent food fraud; animal feeding stuffs relates to what the farmed livestock is fed because this animal feed will ultimately enter the food chain. The Food Standards Agency 'farm to fork' approach provides a comprehensive and integrated system of official controls which protects public and animal health, and helps build consumer confidence. The Plan provides a clear strategy and ensures that resources are targeted towards front line services and high risk activities.
 - 1.3 The food and feed service plan supports the corporate vision and objectives with respect to a confident place where business and enterprise thrive. The Service provides advice and support to local businesses, information to consumers and encourages healthier lifestyles.
 - 1.4 With respect to the needs of the business community, the Service always seeks to advise businesses on regulation and ensures that any formal action taken is commensurate with the risk involved. In addition the Service ensures that non complying businesses do not enjoy an economic advantage in these challenging times. This approach reduces the burden on smaller businesses and contributes to the maintenance of the local economy.
 - 1.5 Feedback from the established annually held Food Forum and food business customer survey results show continued support from the business community for the food and feedstuffs service.
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2 Current Position

- 2.1 Details of the performance of the teams against last year's service plans are contained in the refreshed service plans attached as appendix 2 and 3 to this report. In summary the following headline achievements are worthy of note.
- 2.2 During 2014/15, Environmental Health Officers undertook a total of 1484 interventions at premises and processed 539 complaints and requests for assistance/advice in relation to food safety and standards. In addition 295 food samples were taken for analysis of which 28 were unsatisfactory.
- 2.3 Officers within Trading Standards have conducted 20 inspections relating to animal feeding stuffs during 2014/15 in Oldham, with a further 63 being carried out in support for a number of neighbouring local authorities (Manchester, Blackburn, Trafford and Rochdale) at full cost recovery. The team has also processed 12 new applications for registration under the regulations and taken one sample for analysis following a complaint. Officers have also dealt with 9 service requests relating to allegations of prohibited animal by products entering the feed chain.
- 2.4 These service plans provide more detail as to the performance in 2014/15 and set out the aims and objectives of the two services, areas for improvement and the resources dedicated to the tasks.

3 Options/Alternatives

- 3.1 Option 1: To approve the Plans
 - 3.1.1 Approval of these plans would secure compliance with the obligations placed upon the council and ensure that the work of the service is directed accordingly throughout 2015/16.
 - 3.1.2 The council is required to approve a service plan in some form as it is a requirement of the Food Standards Agency framework agreement to ensure elected members endorse the planned activity for the year.
- 3.2 Option 2: Do not approve Plans
 - 3.2.1 Failure to adopt these plans places the council at risk from national regulators and is not an option in this case.

4 Preferred Option

- 4.1 Option 1 is the preferred option. This option would allow Public Protection to deliver an effective, high quality, coordinated service throughout the year to ensure the safety and wellbeing of those who live and work in Oldham.
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5 Consultation

- 5.1 A telephone customer survey was conducted by the food service and shows strong support for the service. Typical comments received were the service is "excellent", "can't be improved", "the officer was professional, firm but fair and explained things in a very clear and concise way". Even a business that had his Food Hygiene Rating reduced said he was "very satisfied" with the service because even though he was disappointed with his new score rating he was very clear what he needed to do to get his rating back up to a 5 score.
- 5.2 The established Oldham annual food forum, where food businesses and environmental health officers meet, always shows strong support for the service and the way food enforcement is carried out. Business members of the food forum clearly stated that they were impressed with the quality, volume and scope of work carried out by this small team and greatly value this work.

6 Financial Implications

- 6.1 All cost implications arising from the approval of the Feed Service Plan can be met through the Food Safety and Trading Standards revenue budgets within the Public Protection Service.
- 6.2 The total costs are estimated to be in the region of £10k for food sampling and will be met from existing resources on cost centres 22300 (Food Safety) and 23300 (Trading Standards). (Danny Jackson/Sadrul Alam)

7 Legal Services Comments

- 7.1 None (A Evans)

8 Co-operative Agenda

- 8.1 The attached plans support the cooperative agenda by working with businesses and ensuring clear communication of borough priorities.

9 Human Resources Comments

- 9.1 Not applicable.

10 Risk Assessments

- 10.1 Risks will be assessed as part of the inspection programme

11 IT Implications

- 11.1 No implications
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12 Property Implications

12.1 None

13 Procurement Implications

13.1 No implications

14 Environmental and Health & Safety Implications

14.1 None

15 Equality, community cohesion and crime implications

15.1 None

16 Equality Impact Assessment Completed?

16.1 Not applicable

17 Key Decision

17.1 Yes

18 Key Decision Reference

18.1 NEICO-02-15

19 Background Papers

19.1 None

20 Appendices

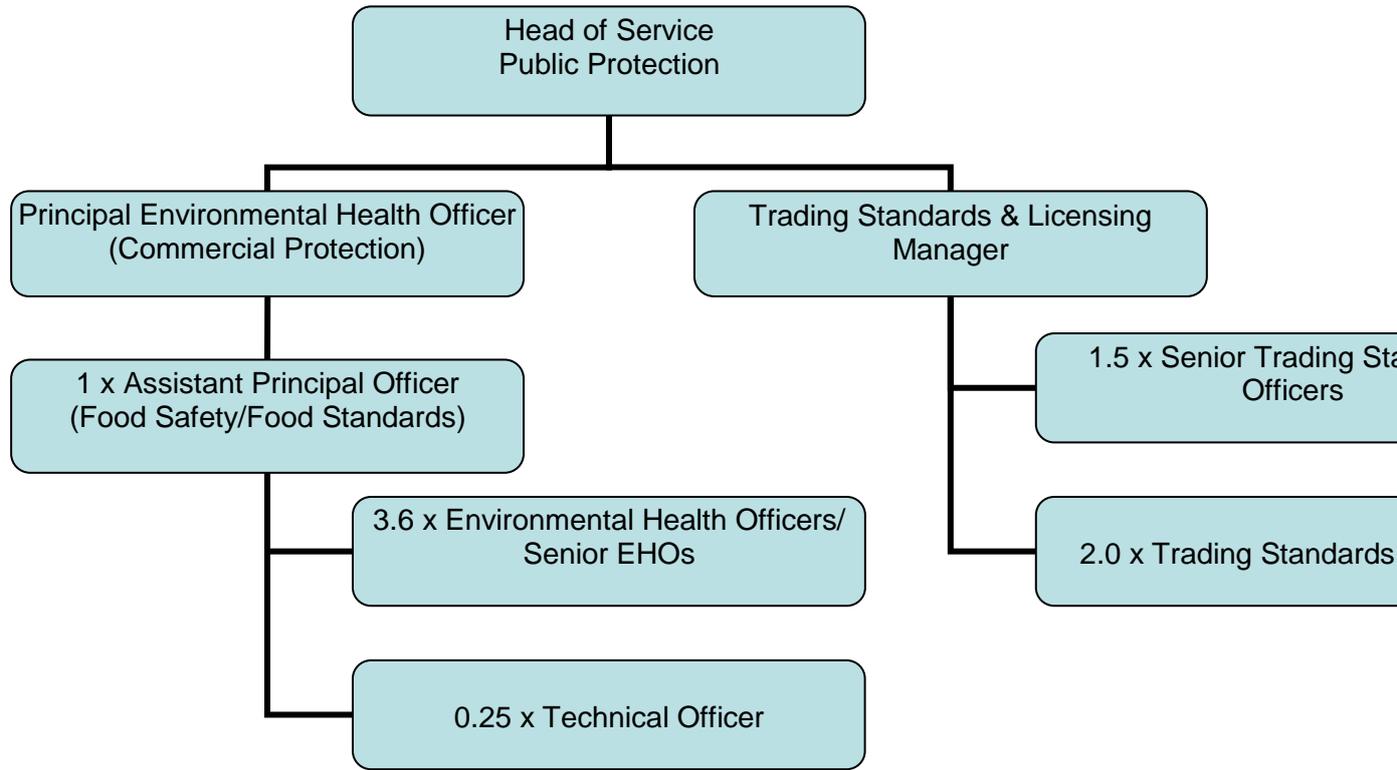
Appendix 1 – Structure of officers that undertake Food and Feedstuffs work

Appendix 2 - Proposed Food Service Plan

Appendix 3 - Proposed Feed Service Plan

Appendix 4 – Registration Activities

Appendix 1 – Structure of officers that undertake Food and Feedstuffs work



Public Analyst and Agricultural Analyst – Lancashire County Scientific Services
Pedders Way
Riversway Docklands
Ashton
Preston
PR2 2TX
UKAS No. 0625, Official Food Control Laboratory

OLDHAM COUNCIL
Neighbourhoods and Co-operatives

FOOD SERVICE PLAN
2015 / 2016

May 2015

1.0 INTRODUCTION

1.1 Oldham's Food Service is responsible for both food safety i.e. unsafe food and unhygienic practices; and food standards i.e. quality, composition, labelling in the Borough's food businesses.

1.2 The Food Service is located at Chadderton Town Hall, Middleton Road, Chadderton, Oldham, OL9 6PP. The telephone enquiries and advice line is 0161 770 2244. E mail address for general enquiries environmentalhealth@oldham.gov.uk

2.0 SERVICE AIMS AND OBJECTIVES

2.1 Aims

- (i) To ensure that all food intended for human consumption that is manufactured, prepared or sold within Oldham complies with food safety requirements, is of genuine quality and composition and is correctly labelled. Clear information, guidance and advice will be given to help business operators meet their responsibilities.
- (ii) To encourage improvement of nutritional standards in food for sale.

2.2 Objectives

To achieve our aims to protect public health and enhance food safety we have identified the following objectives:

- i) To respond to all service requests in accordance with the Council's targets and procedures.
 - ii) To meet regulatory minimum inspection frequencies for food hygiene and food standards whilst maintaining an effective, impartial and consistent approach to enforcement.
 - iii) To take part in national and locally agreed food sampling surveys focussing on areas of concern, including imported food; and to sample in response to food complaints and to gather intelligence on potential problem areas.
 - iv) To advise and inform businesses on how to comply with food law by means of providing them with – advice during visits to their premises, web based information, informal education and training courses.
 - v) To increase consumers' knowledge of food safety and food labelling matters, so they can protect themselves from food borne illness and allergens. This is through web based information or through public engaged activities such as those undertaken during Food Safety Week
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and other FSA campaigns e.g. 'Look Before You Book' and 'Six Tips for a Top BBQ'.

- vi) To continue to work with our public health partners and other partners at local and national level where possible in order to improve the diet and health of Oldham residents and visitors.
- vii) To continue to implement the Food Hygiene Rating Scheme (FHRS), which allows consumers to find out more information about food establishments and this enables them to make a more informed choice as to where to eat out or where to buy food.

2.3 **Corporate Planning**

The food service plan supports the corporate vision especially with respect to ensuring that the Borough is a productive place to invest because business is encouraged to thrive. The Service always seeks first to advise businesses on regulation but if formal action is unavoidable then we ensure it is commensurate with the risk involved. In addition the service ensures that non complying businesses do not enjoy an economic advantage in these challenging times.

Feedback from the Food Forum and food service customer survey results shows clear business support for this firm and fair approach.

The food service contributes to the anti-poverty work undertaken by the Authority because it has real benefits for low-income households. The proportion of income spent on food is higher in these households and their spending choices are more limited. These groups also suffer the greatest health inequalities and will benefit most from any healthy eating initiatives.

3.0 **BACKGROUND**

3.1 **Oldham Profile**

Oldham has a population in the region of 225,000 and covers 141 square miles. The east of the Borough is a rural area and comprises more than half the geographical area of the Borough, but contains only a tenth of the population. In contrast the west of the Borough is an area of mixed urban development with more than one in five of the residents living in income deprived households. Oldham is amongst the 10% most deprived boroughs in the country and, like many other deprived areas faces significant challenges of health inequality, unemployment and low wages.

17.4% of the population of Oldham belong to an ethnic minority group, of which the majority are of Pakistani and Bangladeshi origin. The composition of the population in Oldham also shows a higher proportion of young people than elsewhere, and fewer elderly people.

3.2 Organisational Structure

As outlined at Appendix 1

3.3 Scope of the Food Service

Food officers from the Environmental Health Service deal with all Food Safety and Food Standards matters. Environmental Health Officers are also responsible for infectious disease control which includes not only food poisoning but also a variety of notifiable diseases such as norovirus, hepatitis etc. Outbreaks take priority, cannot be planned for and can be extremely resource intensive.

3.4 Demands on the Food Service

3.4.1 The Authority currently has 1973 food premises recorded on its Civica database. In general the food premises in Oldham are mixed with almost 70% being classed as restaurants and other caterers, and 27% as food retailers.

A small number of high risk manufacturers producing products made from animal origin require specific approval- i.e. product approved premises.

Dairy Products	5
Meat Products	3
Egg packer	1
Cold store	4
Total	13

3.4.2 The external factors which impact upon service delivery include:

- (i) 10% of food business owners do not have English as their first language and are principally of a Pakistan or Bangladesh ethnic origin. These businesses are mostly located in areas where unemployment is high so opening a small businesses is common hence competition is intense.
- (ii) The staff of the food safety team are frequently requested to participate in healthy eating initiatives but as we do not have the resources for this work we will continue to involve and then support our public health colleagues where ever possible.
- (iii) The current economic climate continues to give rise to serious health and safety and food safety issues in food premises as businesses try to save money by switching off catering appliances, cancelling pest control contracts and reducing staff hours for cleaning.

3.5 Enforcement Policy

The Public Protection service adheres to the corporate enforcement policy and all enforcement action is closely monitored and any subsequent prosecution

files are signed off by the Principal Officer before submission to the Borough Solicitor.

4.0 **SERVICE DELIVERY**

4.1 **Food Service Inspections/Interventions**

4.1.1 Food Safety and Food Standards inspections examine very different aspects of a food business – the former focuses on hygiene and the latter on labelling/quality. In accordance with the Food Law Code of Practice (England) each business receives a risk rating and is inspected according to this risk but in general the food safety inspection takes priority and incorporates a light touch food standards assessment. The FSA are aware that most LA's are carrying out the minimum of food standards inspections – i.e. focussing only on higher risk ones only.

4.1.2 Food Safety

Table 1 Food Safety premises profile

	Primary producers	Manufacturer /Packer	Importer/ Exporter	Distributor/ Transporter	Retailer	Restaurants & Caterers	Total
Premise Rating - A	0	0	0	0	1	4	5
Premise Rating - B	0	8	0	0	6	119	133
Premise Rating - C	0	7	0	0	51	417	475
Premise Rating - D	0	3	0	6	185	429	623
Premise Rating - E	2	5	2	9	245	297	560
Premise Rating - Unrated	0	1	0	0	8	28	37
Outside programme	0	4	0	7	40	75	126
Totals	2	28	2	22	536	1369	1959

(Unrated – new premises not yet operating but expected to commence during 2015)

(Outside- premises not included in the inspection programme as they are very low risk e.g. a pharmacy selling cough sweets)

Table 2 Food Safety/Food Standards Inspection Frequency of Food Businesses

Category	Minimum Inspect. Freq. Food Safety	Minimum Inspect. Freq. Food Standards
A	At least every 6 months	At least every 12 months
B	At least every 12 months	At least every 24 months
C	At least every 18 months	Alternative enforcement strategy or intervention every 5 years
D	At least every 2 years	N/A
E	Alternative enforcement strategy or	N/A

	intervention every 5 years	
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With respect to food safety, officers inspect all high risk premises i.e. category A and B premises, all non-compliant category C premises and any Category C premises deemed worthy of an inspection following intelligence/local knowledge. Inspections are carried out without prior notice and food officers regularly undertake evening work and, when necessary, weekend work to achieve this. They also inspect all new businesses as turnover in ownership is especially high in takeaway premises and food safety can deteriorate very quickly.

This is in line with the Government's better regulation agenda which targets intensive regulation at those businesses that present the greatest risk to public health.

It is obviously paramount that food premises within the lower food safety risk bands are not allowed to deteriorate unchecked so that they become a danger to public health and also undermine confidence in the Food Hygiene Rating System. These premises are inspected after intelligence received from food sampling or service requests etc.

The Food Standards Agency is constantly updating guidance to all local authorities on controlling the risk of cross-contamination from E.coli 0157 because of both the low infective dose of this organism and the serious effects of infection. Officers use the guidance in all their food visits e.g. during inspections or sampling visits. They constantly advise food business operators how to prevent this organism, which can be found in raw foods, cross contaminating ready to eat foods.

Food officers use ATP hygiene monitoring test equipment which involves swabbing a food surface and even the hands of a food handler to give a rapid result of cleanliness in a numerical format. Businesses have responded very positively to these immediately visible results and appreciate the efforts taken to help educate them on good cleaning practices. The Service now has 3 ATP meters and also used them as part of a project carried out with the Catering School Meals Service to update their food safety procedures.

Table 3 Food Safety Interventions carried out

	Primary producers	Manufacturers and Packers	Importer/Exporter	Distributor/Transporter	Retailers	Restaurants & Caterers	Totals
Inspections and audits	0	19	3	8	200	740	970
Verification and surveillance	1	12	0	8	64	157	242
Sampling visits	0	15	1	1	34	30	81
Advice and education	0	4	3	0	14	30	51
Information/intelligence gathering	0	3	0	1	17	119	140
Total Interventions	1	53	7	18	329	1076	1484

4.1.3 Food Standards inspections focus on completely different areas of the business such as composition and labelling and whenever possible they are carried out at the same time as the food safety inspection to reduce burdens on businesses and to utilise officer resources more efficiently.

4.1.4 National Food Hygiene Rating Scheme

Businesses that come within the scope of the scheme are awarded a rating dependent upon the standards identified at the time of the most recent food safety inspection. There are 6 possible ratings that can be awarded and they range from zero to '5'. The top rating of '5' means that the business was found to have 'Very Good' hygiene standards. A business with a zero rating would be classified as 'Urgent Improvement Necessary' and would require further intervention by officers which would more than likely include enforcement action.

Food hygiene ratings can be accessed on the Food Standard Agency and Oldham Council's websites and provides the public with a more informed choice about where to eat and so encourages business operators to improve food hygiene standards. Currently businesses in England are not required by law to display their Food Hygiene Rating sticker but this may change as Wales has successfully introduced mandatory display.

Table 4 - Food Hygiene Rating System - % breakdown of distribution of rated establishments in Oldham

FHRS rating	Total
5 - Very good	51%
4 - Good	24%
3 - Generally satisfactory	16%
2 - Improvement required	3%
1 - Major improvement required	6%
0 - Urgent improvement required	0%
Establishments with rating of 3 or better	91%

Food business operators have a right of appeal and can request a revisit for a re- inspection once they have rectified outstanding work. The team carried out 44 re- inspections following request for revisits. Currently these re-inspections are free to the food business operator.

4.2 **Complaints/Requests for Service**

Food safety complaints/requests for service are investigated in accordance with procedures within the team's food quality system. There is a response target of 3 working days for these requests. In 2014/2015 there were the following recorded requests for service.

Table 5 Requests for service

	Number	Response within 3 day Target
Food Safety Complaints	189	189
Food Standards Complaints	31	31
Requests for Advice	319	319

4.3 **Primary Authority Principle**

Oldham has not yet been approached to act as Primary Authority for any national company, but officers have regard to the statutory advice and inspection plans when they inspect businesses which have a primary authority agreement. However, Oldham Council acts as the originating authority for a number of local manufacturers.

4.4 **Advice to Business**

Officers have contact with businesses on a daily basis during inspections and investigations and they use these opportunities to offer advice and assistance whenever possible. But in addition businesses regularly contact officers for advice as in particularly small to medium food businesses rely on the food service to give them up to date information. There were 319 such requests last year – as per table above.

The Service has information for the public and businesses on the website which provide links to national bodies such as the FSA and HPA (Health Protection Agency) etc.

The Food Safety Team also holds an annual food safety forum for businesses which provides an excellent opportunity for discussion and exchange of information. Issues from this Service Plan and current issues raised by FSA guidance are discussed and the implications for businesses clarified.

4.5 Sampling

Food sampling protects the consumer and provides an invaluable source of intelligence to the service. Food businesses are also keen to learn the outcome from samples and how to improve their food safety practices or compliance with compositional/labelling requirements.

Table 6 Number of samples taken in 2014/15

Sample Type	No Samps.	Satis.	Unsatis.
Microbiological Food Samples	228	203	25
Food Standards Samples	76	53	23
Total	304	256	48

Microbiological food sampling relates to the safety of food and can highlight poor food handling etc. Food Standards sampling relates primarily to food labelling and/or composition.

A copy of the Sampling Policy is available on the Oldham Council website.

4.6 Imported Food

Food safety officers can spend significant time tracing documentation in order to ensure that imported foods (especially from non EU countries) fully comply with UK legislation. This work is incorporated into routine food premises inspections. Officers took 54 imported food samples for analysis.

4.7 Infectious Disease Control

Day to day control of food poisoning/infectious disease notifications and investigations is the responsibility of the Food Safety Team and if an outbreak occurs the service works to an infectious disease outbreak plan which has been produced in conjunction with Greater Manchester Health Protection Unit. In 2014/15 we received 57 complaints of suspected food poisoning. The Health Protection Agency reported 6 confirmed cases to us - none of which were found to be contracted within Oldham.

4.8 Food Alerts

The FSA may issue a 'Product Withdrawal Information Notice' or 'Product Recall Information Notice' to let local authorities and consumers know about problems associated with food. In some cases local authorities are required to take specific action to be protect the public health of consumers.

The work involved in responding to food alerts is impossible to predict. There were 33 national food alerts received from the FSA during 2014/15 -most relating merely to product withdrawal or recall. Some create an intense but brief demand on officer resources and may require enforcement action whereby the food in question could be detained/seized and on occasion destroyed.

4.9 Liaison with Other Organisations

The Principal Environmental Health Officer regularly attends the meetings of the Greater Manchester Food Liaison Group. A consistent approach to enforcement remains one of the Group's key objectives and training and sampling are also regularly addressed. Formal liaison arrangements also exist with Public Health England.

4.10 Promotion

4.10.1 Resources are scarce and the Council website and local press are used to the best advantage whenever possible to disseminate relevant food safety and food standards messages. For example during Food Safety Week and during the FSA BBQ' campaign the appropriate message is highlighted for that week on the Council website/Team Brief and officers use an unmanned stall in Oldham Indoor market with the relevant literature and food safety information.

4.10.2 In addition, the team has produced and promoted 'Top Ten Tips' for Childcare Settings which gives food safety information to ensure the safe storage, handling and preparation of food for vulnerable groups. This information is available on the Oldham website.

4.10.3 In line with the Co Operative Borough a 'Top Ten Tips for Food Businesses and Domestic Premises' on pest control matters was produced by the team and promoted by the Imam at a local the Mosque during Friday prayers. This information leaflet explains how a food business and home owners can help prevent problems with pests, how to manage a problem and where to seek assistance.

4.10.4 Working with our partners in Catering environmental health officers delivered food safety update training for 92 Oldham Council primary schools and 3 private primary schools. Approximately 160 food handlers attended these sessions. To follow up on these training sessions, all these schools have been audited to ensure that high standards of hygiene are being achieved and maintained.

4.10.5 In December 2014, new EU legislation came into force which requires food businesses to provide allergy information on food which is sold in unpackaged form - for example, in catering outlets, deli counters, bakeries and sandwich bars. Two free training sessions have been held where 32 food business received updates and information on these new legislative changes. Feedback from these training sessions was excellent and more training sessions are planned in 2015/16.

5.0 **RESOURCES**

5.1 **Financial Allocation For Food Service**

5.1.1 *Table 7 Food Service*

TEAM	CODE	EXPENDITURE £	INCOME £
FOOD SAFETY	Staff (including NI and Supn)	255,920	
	Training (Budget held by work force & org dev)	1,000	
	Operational Equipment	1,000	
	IT Investment (Central recharge)	8,520	
	Legal support (central recharge)	8,350	
Total		274,790	

5.2 **Staffing Allocation Food Service**

5.2.1 There are 5.25 FTE officers within the establishment focussed on the delivery of the food service plan including the Principal Officer who manages 4 other teams. The structure is illustrated in Appendix 1.

5.2.2 The Food Team has met the national targets for food hygiene and food standards inspections.

5.3 **Staff Development Plan**

5.3.1 All training needed to deliver the Food Service Plan is managed in accordance with Corporate training. Specific training needs are identified during staff appraisals . All free FSA and subsidised AGMA training is taken full advantage of and the team also invests in on-line training. These measures help to ensure effective training while keeping costs to a minimum and as a result all officers are well trained, experienced and competent to fulfil their role.

6.0 **REVIEW**

6.1 **Review Against Food Service Plan**

6.2 An ongoing review process takes place during monthly team meetings and “1 to 1`s” where officers are advised of their performance against the targets set in this Service Plan.

Table 8 Performance Indicators

	Performance Indicators	Actual Performance 2014/2015
1.	100% of complaints/requests for service to be responded to within 3 working days	100%
2.	100% of food premises categories A-B due for inspection inspected.	100%
3.	100% of <i>E. coli</i> O157 and <i>Legionella</i> notifications responded to within 1 working day.	100%

Table 9 Performance 2014/15

	Performance Standard (2014/15 Service Plan Performance Targets)	Actual Performance 2014/2015
1.	To maintain performance of 100% inspection rate for all Category A-B premises for food safety; and all non-compliant Category Cs.	Performance maintained at 100% inspection rate for Category A-B premises and all non-compliant C premises inspected; and any premises deemed to be at risk of falling standards
2.	To achieve 100% inspection rate for Category A premises for food standards and higher risk Category B premises.	Achieved
3.	To secure improvement in overall standards within food businesses within the Borough.	The broadly compliance figure remains at 84%
4.	To continue work with our colleagues in Public Health were possible to help deliver the Greater Manchester Healthier Catering Award and drive up nutritional standards in Food Businesses across the Borough. The Public Health Team may need to recommit this function.	The team have worked with public health colleagues to launch the Healthier Catering Award in the Borough. One food business has achieved the excellence award following assessment by the Public Health Team.
5.	To adhere to guidance from the Local Better Regulation Office and ensure that Oldham food businesses are given every incentive to improve. We will endeavour to focus formal enforcement work on the serious, serial offenders. At the same time we will support our good businesses to ensure we minimise unnecessary burdens and help them reduce real risks. This will enable good	Responded to 319 requests for advice from businesses. All businesses given clear advice on areas for improvement following inspections. 10 businesses attended the Food Safety Forum.

	businesses to concentrate on driving their business forward and so contribute to the general economic prosperity of the Borough.	3 prosecutions of serious offenders*. 1 voluntary closure. 1 simple caution
	Additional in Year Unplanned Performance	Performance
1.	Support for colleagues in the catering department with regards to food safety industry updates through the provision of training to the Council Primary School Kitchens. Food Safety Officers to then conduct audits to assess and embed this learning.	The team carried out food safety update training for 92 Oldham Council primary schools and 3 private primary schools. Approximately 160 food handlers attended these sessions. All schools were subsequently audited to embed the training and ensure that high standards of hygiene are being achieved and maintained.
2.	Recognised business need for allergy information due to the Food labelling changes made in December 2014 which extend allergen labelling requirements to include loose foods. This change affected most businesses who sell food in the Oldham area.	Two free training sessions have been held where 32 food businesses received updates and information on these new legislative changes. Feedback from these training sessions was excellent and more training sessions are planned for 2015/2016.

Table 10 Prosecutions Taken and Simple Cautions Issued - 2014/15

Premise Type	Enforcement Action	Legislation	Fine	Council Costs
Takeaway	Prosecution	Regulation (EC) 852/2004 10 offences	£2,500	£2,335
Grocer/ Butcher	Prosecution	Regulation (EC) 852/2004 6 offences	£6,000	£1835.25
Takeaway	Prosecution	Regulation (EC) 852/2004 6 offences	£1,800	£1600
Restaurant	Simple Caution	Regulation (EC) 852/2004	N/A	N/A
Totals			£10,300	£5770.25

* In 2014/2015 there has been a reduction in the number of prosecutions taken compared with 2013/2014 when there were 8 convictions. The impact of these high profile cases in the press together with the promotion of the food hygiene rating scheme has influenced businesses to improve hygiene standards. However, the Council continue to take risk based and proportionate enforcement action when serious offences are found and public health is at risk.

6.3 Areas for Improvement - Food Service

- To maintain performance of 100% inspection rate for all Category A-B premises for food safety.
 - To achieve 100% inspection rate for Category A premises for food standards.
 - To secure improvement in overall standards within food businesses within the Borough as measured by the FSA broadly compliant figure or FSA food hygiene rating scheme.
 - To continue to provide additional free food allergy training to sector specific businesses, for example; restaurants, cafes. To update and inform these businesses of their legal duties in relation to the new food labelling rules which came into force in December 2014.
 - To continue to work with and support our Public Health partners by providing suitable businesses for the Public Health Team to follow up with the assessment for the Healthier Catering Award.
 - To adhere to guidance from the Local Better Regulation Office and ensure that Oldham food businesses are given every incentive to improve. We will endeavour to focus formal enforcement work on the serious, serial offenders. At the same time we will support our good businesses to ensure we minimise unnecessary burdens and help them reduce real risks. This will enable good businesses to concentrate on driving their business forward and so contribute to the general economic prosperity of the Borough.
 - Aim to reduce the number of businesses only achieving a zero and 1 score on the food hygiene rating scheme. The team will deliver targeted initiatives to drive up hygiene standards and help support Oldham businesses and enterprises to thrive.
 - To support colleagues in the catering department with regards to the new food allergy legislation through the delivery of training and advice to the Oldham School Kitchens.
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OLDHAM COUNCIL

Neighbourhoods

FEED SERVICE PLAN

2015 - 2016

May 2015

INTRODUCTION

Officers from the Public Protection Division of the Neighbourhoods Directorate deliver the complete 'farm to fork' food service. Environmental Health deal with all Food Safety and Food Standards matters and Trading Standards deal with Animal Feeding Stuffs.

The Trading Standards Service also acts as Feed Authority (to varying extents) for 4 other authorities. Not only is this advantageous for the Service in creating income, but also it enables Feed Officers to maintain competency at a wide variety of premises. Without maintaining competency through professional practice Feed Officers would not be able to be authorised to undertake feed work.

1.0 TRADING STANDARDS SERVICE AIMS AND OBJECTIVES

1.1 Aims and Objectives

- (i) To ensure all feeding stuffs, including pet foods, are of merchantable quality, contain no deleterious or dangerous ingredients, and are labelled correctly;
- (ii) To ensure that feeding stuffs are produced, transported, stored and used hygienically;
- (iii) To continue to register and / or approve all feed business establishments.

1.2 Corporate Aims and Objectives

Our ambition is to deliver a co-operative future where everyone does their bit to create a confident and ambitious borough. There are three corporate objectives that underpin the delivery of the ambition. They are:

- A productive place to invest where business and enterprise thrive;
- Confident communities where everyone does their bit ;
- A co-operative council creating responsive and high quality services.

The objectives have been developed to reflect the key priorities of the council including economic growth and regeneration, strong local leadership and delivering value for money services.

The feed service plan meets these objectives through supporting local businesses and providing advice and education to consumers.

2.0 BACKGROUND

2.1 Profile of the Local Authority

Oldham has a population in the region of 219,800 and it covers 141 square miles and is a Borough of great contrasts. The East of the Borough is a rural area characterised by moorland and valley villages and comprises more than half the geographical area of the Borough, but contains only a tenth of the population. In contrast the west of the Borough is an area of mixed urban development with more than one in five of the residents living in income deprived households.

17.1% of the population of Oldham belong to an ethnic minority group, of which the majority are of Pakistani and Bangladeshi origin. The composition of the population in Oldham also shows a higher proportion of young people than elsewhere, and fewer elderly people.

2.2 Organisational Structure

As outlined in Appendix 1.

2.3 Scope of the Feed Service

The Feed Service specific functions are:

- Programmed inspections at identified premises;
- Sampling of animal feed for analysis and / or examination as part of EU, national, regional and local programmes;
- Dealing with feed safety incidents, complaints, referrals and requests for specialist consumer advice relating to animal feed;
- Providing feed business information, advice and support on request.

The Feed Service is provided by officers employed within the Trading Standards Team. The Food Service (Hygiene and Standards) is provided by officers employed within the Environmental Health Team. Within the Environmental Health Team there are also Animal Welfare officers who inspect and licence all animal establishments within the Borough.

All enforcement services are provided in-house by officers employed by the local authority and supported by external expertise when necessary.

2.4 Demands on the Feed Service

The Authority currently has 65 premises registered under the Feed Hygiene Registration Scheme. The majority of premises are 'R13' i.e. livestock farm which does not mix feeds or do mix feeds without additives. These are classified as low risk under the National Trading Standards Board (NTSB) risk scheme. The remaining premises on the register are 'R11' i.e. mixing feed on farm with compound feeding stuff which contain additives, 'R12' i.e. food businesses selling co-products (material generated as a by-product of the

manufacture of food) and 'R7' i.e. manufacture and / or placing on the market feed materials.

Trading Standards are located at Sir Robert Peacock House (VIP Centre), Vulcan Street, Oldham, OL1 4LA. The telephone enquiries and advice line is 0161 770 4730 and the reception desk is open from 8:40am to 5:00pm Monday to Friday.

Oldham Trading Standards does have service level agreements to conduct FSA funded work on behalf of Trafford Council, Rochdale Council and Manchester City Council.

Oldham Trading Standards also acts as the feed authority for Blackburn with Darwen Borough Council. This covers several elements:

1. Programmed premise visits;
2. FSA targeted work;
3. Identification of premises subject to registration / approval;
4. Assessment visits to premises;
5. Response to service requests / complaints;
6. Lead officer role.

2.5 Enforcement Policy

The Public Protection Service adheres to the corporate enforcement policy and all enforcement action is closely monitored and any subsequent prosecution files are signed off by the Team Manager before submission to the Borough Solicitor.

The Council has a Corporate Enforcement Policy which is available via the website www.oldham.gov.uk

3.0 SERVICE DELIVERY

3.1 Inspections (interventions) at Feeding stuffs establishments

- 3.1.1 Feed inspection frequency is conducted according to the NTSB risk scheme. The table below details the inspection programme for the premises currently on the register for the period 2014 – 15. An explanation of the definition of the 'R' premise types can be found at Appendix 2.

Oldham

'R' Premise Type	No. of Premises on Register	No. of programmed inspections / interventions
R7	13	8*
R11	3	0
R12	1	1*
R13	48	12**

*1 visit to be funded by the FSA.

**4 of the visits to be undertaken by TS are to be funded by the FSA and Animal Welfare are currently scheduled to visit a further 7 of the establishments (tbc).

In addition to those premises scheduled for an inspection / intervention 3 of the R13 premises and 2 of the R7 premises on the register will also be the subject of FSA funded Alternative Enforcement Strategies (AES).

Blackburn

'R' Premise Type	No. of Premises on Register	No. of FSA funded inspections / interventions
R1	1	-
R6	1	1
R7	6	*
R11	1	-
R12	6	5
R13	116	21

*1 of the R7 premises on the register will also be the subject of FSA funded AES.

Manchester

'R' Premise Type	No. of FSA funded inspections / interventions
R7	*
R12	3

*11 of the R7 premises on the register will also be the subject of FSA funded AES.

Trafford

'R' Premise Type	No. of FSA funded inspections / interventions
R1	1
R6	1
R7	2*
R8	1
R9	1
R12	1
R13	1
R14	1*

*In addition to those premises scheduled for an inspection / intervention 1 of the R14 premises and 3 of the R7 premises on the register will also be the subject of FSA funded Alternative Enforcement Strategies (AES).

Rochdale

'R' Premise Type	No. of FSA funded inspections / interventions
R7	*
R8	1
R9	2
R13	33* - Rochdale are to undertake 10 of the 33 inspections / interventions scheduled.
R14	1*

*In addition to those premises scheduled for an inspection / intervention 14 of the R13 premises, 1 of the R14 premises and 1 of the R7 premises on the register will also be the subject of FSA funded Alternative Enforcement Strategies (AES).

- 3.1.2 The level of inspection detailed above and the associated work can be met with the resources available.
- 3.1.3 Feed Officers are qualified and maintain competency as per the requirements of the Feed Law Enforcement Code of Practice for Level 1 and Level 2 premise types.
- 3.1.4 Where possible and appropriate, inspections will be planned so that businesses are visited within 28 days of the relevant date determined by the inspection rating.
- 3.1.5 Inspections are conducted in accordance with the Feed Law Enforcement Code of Practice.
- 3.1.6 Interventions or inspections of medium and low risk premises will be undertaken as necessary subject to the Service receiving complaints, service requests, information or intelligence.
- 3.1.7 The Service will participate in any FSA grants which are made available to undertake official controls at targeted feed business operators.

3.2 Feed Registrations and / or Approvals

Work has been undertaken to ensure that the Registrations and / or approvals accurately reflect the premises within the Borough. Environmental Health utilise a pro-forma inspection document which includes a tick box to indicate whether a business is supplying surplus food as animal feed. If this is occurring Environmental Health will forward the details to the Lead Officer for Feed who will then issue a registration number and generate an inspection

date. Animal Welfare will continue to complete the 'Feed Hygiene Report Form' (FQS T09) during any relevant visit that they undertake which will be forwarded to the Lead Officer for Feed. The Lead Officer for Feed will issue a registration number if the business is not registered and will log the visit on the CIVICA / FLARE database.

The above work will link in with the 'National Enforcement Priorities for Feed Authorities in Great Britain – 2014/2015'. The co-ordinated approach detailed above will assist in identifying those premises in Annex 1 of Chapter 2.1 and 2.5 through to 2.9 which should have an appropriate feed safety management system. Further, it will also assist in identifying those businesses involved in the supply of surplus food and / or co-products to the feed chain. The completion of a template form by Animal Welfare officers on feed hygiene matters will also ensure controls at premises subject to Annex I and III of EC Regulation 183/2005 on feed hygiene are adequate which will ensure that the priorities in Annex 1 of Chapter 3.1 through to 3.5 are addressed.

3.3 Feed Complaints / Requests for Service

Feed complaints / requests for service for are to be dealt with in accordance with the procedures within the Feed quality system. All complaints received into the Service are assessed and investigated accordingly. The information is recorded for intelligence purposes and may be used to monitor and identify problem traders, consumer trends or assist future investigations. The information may also be used to determine intervention intervals. In 2014 - 15 there were 9 recorded requests for service which related to allegations of prohibited Animal By-Products entering the feed chain, tape worm in tripe and matters relating to registration.

3.4 Home Authority Principle and Primary Authority Principle

There are not currently any feed businesses within the Borough that would be suitable for a Primary Authority agreement. The Service is however familiar with the relationships and protocols resulting from such agreements which other Trading Standards Authorities may have and follow these accordingly. The Service is also aware of the Home Authority Principle and gives appropriate consideration to this.

3.5 Advice to Business

Trading Standards provide advice, guidance and support to feed businesses to encourage legislative compliance and to promote a fair trading environment. A considerable amount of advice is provided to business through officer contact during the course of inspections or other interventions such as survey initiatives etc. Business information advice sheets are available through various websites that we would make businesses aware of as and when required. Whilst business advice was provided in the course of officer inspections there were no direct requests for advice made to this Service. For more complex feed related matters the Service now provides Business Advice at a set fee.

3.6 Animal Feed Sampling

The Service will follow Trading Standards North West (TSNW) initiatives which are based upon FSA sampling priorities.

Where appropriate complaint samples will be submitted for analysis and further formal samples may be taken if necessary.

Further, the National Enforcement Priorities sets out a number of sampling priorities for local authorities to consider. Given these sampling priorities we have liaised with Lancashire County Scientific Services (LCSS) to identify samples that can be obtained in 2014 – 15 as follows:

Name of Authority	No. of samples to be obtained
Oldham	2*
Blackburn	5
Manchester	3
Trafford	1
Rochdale	2

*With the exception of 1 of the samples to be obtained in Oldham all are funded by the FSA.

The Authority has contracted with LCSS to provide the agriculture analyst for our service.

3.7 Feed Safety Incidents

All feed alerts are received from the Food Standards Agency via e-mail alert. Regular checks are also made on the Food Standards Agency website. On receipt of feed alerts action will depend on the nature of the incident and will be dealt with as required in the Feed Law Enforcement Code of Practice and the relevant work instruction (FQS P04).

3.8 Imported Feed

We are not aware of any imported feed within the Borough but Environmental Health will notify Trading Standards of any businesses importing material they become aware of.

3.9 Liaison with Other Organisations

In order to ensure that enforcement action taken within the Borough is consistent with those of neighbouring local authorities the service participates in the regional group, TS North West Agriculture Group. Feed Officers also have membership to the TSNW Agriculture Hub and the National Agriculture Hub. The Service liaises with its colleagues in Animal Welfare and Environmental Health.

As stated in Paragraph 2.4 of this document the Service does conduct Feed work for other Trading Standards Services. To ensure there is clear understanding of the Services role and responsibilities a Service Level Agreement with a Specification of Work is agreed and signed by the authorities concerned.

4.0 RESOURCES

4.1 Financial Allocation

All cost implications arising from the approval of the Feed Service Plan can be met through the Trading Standards revenue budget within the Public Protection Division. In respect of the work conducted on behalf of other authorities the current hourly / agreed rates adequately cover the costs incurred.

4.2 Staffing Allocation

There are currently 2.6 FTE officers within the Service that are qualified to provide the delivery of the Feed Service Plan. These officers also provide the numerous other functions of the Service and as such they are not therefore dedicated to the area of feed. The Trading Standards Service Structure is detailed within Appendix 2.

4.3 Staff Development Plan

All training needed to deliver the Feed Service Plan is managed in accordance with corporate training procedures and with consideration to the 10 hours per year of continuing professional development identified in the Feed Law Enforcement Code of Practice.

In order to ensure that training needs are met the Service will utilise training provided by Central England Trading Standards Authorities (CEnTSA) and the FSA. The Service will also use other training materials made available, such as DVDs, notes etc.

Of the 2.6 FTE officers engaged in Feed work, 1.9 officers are deemed to be Level 2 authorised. The remaining officer (1 x 0.7 FTE) has had a period of absence due to maternity leave and therefore will continue to undertake supervised visits until they have demonstrated the required level of competency before undertaking Level 2 work.

In order to provide greater resilience a further officer is in the process of being trained in order to undertake Level 1 work.

5.0 **QUALITY ASSESSMENT AND INTERNAL MONITORING**

The authority will conduct self-assessment bi-annually to assess performance against the Standard.

The Service has devised an Internal Monitoring Procedure to ensure the quality of the Authority's Service (FQS P10).

6.0 **REVIEW**

6.1 **Review against the Service Plan**

An ongoing review process takes place during monthly team meetings and one to ones.

- Number of inspections / interventions

In 2014 – 15 the following number of feed related visits were undertaken:

Name of authority	No. of inspections / interventions
Oldham	20*
Blackburn	33
Manchester	7
Trafford	13
Rochdale	10

*With the exception of 15 visits in Oldham all other visits were funded by the FSA or paid for by the relevant local authority.

- Applications for registration

In 2014 – 15 this Service had 12 new applications for registration.

- Samples

In 2014 – 15 this Service submitted 1 sample for analysis – this related to a complaint sample obtained in the course of the investigation of a complaint.

- Implementation of a quality system

In 2013 - 14 a review of the systems and practices highlighted the need for new procedures to be created and implemented. The generation of these policies and procedures formed the areas of improvement for the Service in 2014 - 15 and this has resulted in the following procedures being developed and implemented:

-
- Officer Authorisation
 - Feed Referrals
 - Feed Interventions
 - Feed Sampling
 - Feed Safety Incidents
 - Approval / Registration of feed establishments
 - Detention / Seizure
 - Improvement Notices
 - Prohibition Orders and Emergency Prohibition Notices
 - Simple Caution
 - Internal Monitoring
 - Corrective action procedure

In addition to the above the associated template documents and work instructions have also been devised.

A sampling kit has also been sourced so that the required materials are in place should they be required.

- **Feed Audit**

The quality system assisted in the course of the Feed Audit that took place in October 2013. The Executive Summary in the report contained the following comments:

20.1.1 Executive Summary

Oldham Council was selected for audit as it had not been audited by the Food Standards Agency in the past five years in relation to animal feed. Auditors acknowledged that the audit had taken place at a time following a significant re-organisation of the Service. Despite financial pressures, the Authority confirmed its commitment to a risk-based animal feed service and interventions programme.

Key areas for improvement:

Feeding stuffs establishments interventions and inspections: The Authority needs to ensure that businesses are routinely informed about any contraventions following inspections and should take timely follow-up action to secure business compliance with feed hygiene legislation. The Authority should maintain a record of any such correspondence with businesses.

Internal monitoring: There was some evidence that internal monitoring was being undertaken through checks on feed business inspection histories. However the Authority should ensure that all feed law enforcement activities are monitored and that corrective actions are implemented where necessary.

A full version of the Feed Audit report is available if required.

6.2 Identification of any Variation from the Service Plan

We indicated that we would undertake 26 inspections / interventions in 2014 – 15. From this figure we were able to visit the higher risk premises (R1, R3 and R12 premises). As was detailed in the 2014–15 service plan some premises were coded incorrectly and / or were subject to a primary authority agreement and as such the risk associated with the premise was reduced. Further, all R13 premises due for inspection have not yet been visited as to avoid duplication it was deemed appropriate to wait if Animal Welfare are scheduled to attend given the relatively low risk associated with the premise.

The Service only submitted 1 sample in the course of 2014–15. However, the Service did work closely with LCSS to identify any possible material which could be sampled but nothing suitable could be identified after giving consideration to the National Enforcement Priorities 2013 - 14.

A peer review has not taken place as given that the authority was the subject of a Feed Audit this financial year we did not feel that it was an appropriate use of resources.

6.3 Areas of Improvement - Feed Service 2015- 16

- To increase the number of registered feed business establishments within the Borough;
 - Continue to develop qualified and competent Feed Officers who can carry out a wide range of feed standards and activities.
-

Appendix 4 – Registration Activities

R. Registration activities			
Code	Activity description	Notes	Examples of feed business establishments likely to carry out the activity
R1	Manufacture and/or placing on the market of feed additives (other than those subject to approval).	This includes preservatives, emulsifiers, stabilisers, thickeners, gelling agents, binders, anticaking agents, acidity regulators, antioxidants (not subject to a maximum permitted level), silage agents, denaturants, substances to control radionucleide contamination, colourants (except carotenoids and xanthophylls).	Feed additive manufacturers producing technological or sensory additives. Businesses selling (but not manufacturing) technological or sensory feed additives.
R2	Manufacture and/or placing on the market of premixtures (other than those subject to approval).	This includes premixtures containing any feed additive excluding vitamins A and D and copper and selenium.	Feed businesses producing or selling premixtures, other than those containing vitamins A and D, copper and selenium. Businesses selling (but not manufacturing) such premixtures.
R3	Manufacture and/or placing on the market of bioproteins not subject to approval.	This includes ammonium salts and certain killed yeasts cultivated on substrates of animal/vegetable origin.	Businesses which both manufacture and sell such products; and businesses which do not manufacture but buy and sell such products.
R4	Manufacture of compound feedingstuffs (other than those subject to approval).	This includes the manufacture of complete and complementary feeds, with or without additives.	Businesses manufacturing complete and complementary feeds with or without additives.

R. Registration activities

Code	Activity description	Notes	Examples of feed business establishments likely to carry out the activity
R5	Placing on the market of compound feeds.		Establishments engaged in the buying and selling of compound feeds but not manufacturing such feeds. This includes businesses which do not physically hold any feeds (e.g. importers).
R6	Manufacture of pet foods.	Includes the manufacture of complete and complementary feeds with or without additives.	Pet food manufacturing businesses which manufacture complete and complementary feeds with or without additives.
R7	Manufacture and/or placing on the market of feed materials.	Feed materials are products which can be fed singly to animals or used as ingredients of compound feeds.	Businesses which produce or manufacture single ingredient materials (e.g. cereal or cereal based products, oils and fats) for animal feed use. Food manufacturers and branches of supermarkets involved in the transfer of surplus foodstuffs (e.g. out-of-date bakery products) into the feed chain. NB: this category does not include brewers, distillers and food manufacturers selling co-products into the feed chain -- see activity code R12.
R8	Transport of feed and feed products.	Transport of feed and feed products by manufacturers own vehicles are covered by the approval/registration of	Premises of businesses that transport feed materials, compound feed, feed additives and

R. Registration activities

Code	Activity description	Notes	Examples of feed business establishments likely to carry out the activity
R9	Storage of feed and feed products.	the manufacturer's premises.	premixtures.
R9	Storage of feed and feed products.	Only covers premises not covered by another approval/registration activity relating to the manufacture or placing on the market of the products in question. It excludes storage facilities at a manufacturer's or transporter's premises.	Feed storage premises.
R10 (Farms)	Mixing feed on-farm, with additives and premixtures.	This activity was subject to registration under previous legislation (EC Directive 95/69 as implemented by the Feeding Stuffs (Establishment and Intermediaries) Regulations 1999).	Farmers who buy in additives and premixture products (i.e. not contained in a compound feed) and mix them with feeds (forage, silage, haylage, cereals etc.). Additives and premixtures may include vitamins, trace elements (e.g. copper, zinc) and preservatives (e.g. propionic acid).
R11 (Farms)	Mixing feed on-farm, with compound feedingstuffs which contain additives.	This activity was subject to registration under previous legislation (EC Directive 95/69 as implemented by the Feeding stuffs (Establishment and Intermediaries) Regulations 1999).	Farmers who mix their own feeds on-farm using bought-in compound feeds that contain additives such as vitamins, trace elements, etc.
R12	Food businesses selling co-products of the food industry which are	This includes the selling of feed materials generated as co-products of the manufacture of food products (e.g. wheat bran, brewers grains, residues of	Brewers, distillers, biofuel manufacturers, dairies and food manufacturers. NB: this category does not include food

R. Registration activities

Code	Activity description	Notes	Examples of feed business establishments likely to carry out the activity
	destined as feed materials.	soya bean and rapeseed from the extraction of oils, carrot tops and potato skins).	manufacturers and supermarkets which sell surplus foodstuffs (e.g. out-of-date bakery products) into the feed chain -- see activity code R7.
R13 (Farms)	Livestock farms (including fish farms) which do not mix feeds or mix feeds without additives.		Livestock farmers. This may include farms making silage or haylage (without using additives). Fish farms may also be included under this activity.
R14 (Farms)	Arable farms growing or selling crops for feed.		Arable farmers such as those growing cereals, wheat, barley or food crops, e.g. potatoes, for use as feed.