



Northumberland
County Council

Housing & Public Protection Service

**Public Health Protection Unit &
Business Compliance & Public Safety Unit**

**Food and Feed
Safety and Standards**

SERVICE PLAN 2019-2020

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1.0 INTRODUCTION

This Plan details how the food law enforcement service will be delivered in Northumberland. It has been produced by the Public Health Protection Unit and Business Compliance & Public Safety Unit, which encompasses Food Hygiene / Safety, Food Standards and Feed Hygiene. In delivering our services, we aim to protect, improve public health and ensure a fair trading environment for all businesses in Northumberland.

Interventions will be:

- Transparent
- Accountable;
- Proportionate;
- Consistent;
- Targeted (risk based)

This approach will ensure that the Food Service is delivered in an efficient and effective manner with the aim of improving regulatory outcomes without imposing unnecessary burdens, in line with the requirements of the Regulatory Reform agenda.

Effective delivery of the food service involves a range of partnerships and joint working arrangements with other Council teams, other Local Authorities and stakeholders.

The Plan has been prepared in accordance with the Food Standards Agency (FSA) Framework Agreement on Local Authority Food Law Enforcement. It has also taken account of the changes to food law enforcement by the FSA, in particular the Changes to Local Authority Enforcement (CLAE) project which includes the Local Authority Enforcement Monitoring System (LAEMS).

2.0 SERVICE AIMS AND OBJECTIVES

2.1 Aims

To strive to ensure that:-

- i) Food and drink intended for human consumption which is produced, stored, distributed, handled or consumed in the County is without risk to the health or safety of the consumer.
- ii) Food and food packaging meet standards of quality, composition and labelling and that reputable food businesses are not prejudiced by unfair competition.
- iii) Feed is of satisfactory quality and composition, and is correctly labelled.
- iv) Standards in food and animal feed businesses are improved across the county.
- v) Livestock is healthy, disease free, and suitably cared for, thereby protecting the public.

Objectives

- i) To secure hygienic conditions in food businesses and minimise the risks associated with food handling.
- ii) To ensure food businesses meet legal requirements in respect of hygiene, quality, composition and labelling.
- iii) To promote continued improvements in standards through the adoption and application of good practice.
- iv) To enhance the awareness of food safety and food standards issues amongst food businesses and consumers through education and advice.
- v) To reduce the incidence of food poisoning and foodborne disease in the community.
- vi) To monitor the wholesomeness and sufficiency of water supplies.
- vii) To ensure all feed meets legal requirements in respect of quality, composition and labelling

- viii) To ensure that feed business operators meet legal requirements in respect of hygiene, traceability, quality control, equipment and storage.
- ix) To ensure that primary food and feed producers meet legal requirements in respect of hygiene, traceability, quality control, equipment and storage.

2.2. Links to Corporate Objectives and Plans

The Council integrates and delivers its policies and priorities through a Corporate Planning Framework. The Corporate Plan 2018 to 2021 sets out how the Council will deliver priorities over the next three years. The Housing & Public Protection Service supports the Vision and Values of the County Council in numerous ways across the full range of services it provides. The Service is an integral part of the County Council and recognises the key themes of a new organisational cultural strategy which include:

- Ensuring our services are customer focused
- Supporting communities and staff to embrace change and innovation
- Involving communities and staff in decisions which affect them
- Supporting communities to feel safe
- Creating a healthy and positive working environment

The Housing & Public Protection Service also recognises and will strive to adhere to the five key traits of the Administration: the need for **financial prudence**; being **resourceful**; the need to **listen and consider** views; to be seen as **empowering**; and to seek to **collaborate** where it is in Northumberland's interests to do so.

The Priorities within this document focus on these Visions and Values. The Food Service Plan activities are strongly linked to all the corporate priorities but particularly:

- We want you to feel safe, healthy and cared for (living),
- We want you to love where you live (enjoying).
- We want to attract more and better jobs (thriving).

These elements are the drivers behind the Food & Feed service plan and feeds into the Units and Team Service Plans. Each Team within both Units then as necessary develop their own subject specific service plans. This Food Plan cuts across those Team plans as the duties identified are carried out by the Commercial Team and Trading Standards & Animal Health Team.

3.0 BACKGROUND

3.1 Profile

Northumberland County Council is a unitary authority comprising the main urban conurbations of Berwick-upon-Tweed, Alnwick, Morpeth, Ashington, Blyth, Hexham and many smaller towns and rural villages. It covers over 501,000 hectares in total and has a population of 319,030 (2017) with the higher proportion of the population being concentrated in the industrial south east corner. Northumberland is England's most sparsely populated County with a population density of 64 persons per square km. Please see table below to see the area breakdown for the region. The structure of the County's businesses is weighted towards smaller companies & sole traders.

	Authority	Population	Area (sq. km) ¹
E06000057	Northumberland	317,444	5,014
E06000047	County Durham	521,776	2,226
E08000037	Gateshead	202,628	142
E08000024	Sunderland	277,307	137
E08000021	Newcastle upon Tyne	293,713	113
E08000022	North Tyneside	203,575	82
E08000023	South Tyneside	149,194	64

The Authority covers an area from the Scottish Borders to the boundaries of the Tyne and Wear Authorities, Cumbria and County Durham.

3.2 Organisational Structure

There are 67 Elected Members. Council elections were held in May 2017 and as a result the Council's Administration changed to a Conservative administration. The Council is run through a Cabinet, the Leader of the Council is Councillor Peter Jackson and the Cabinet holder in respect of food & feed safety & standards is Councillor John Riddle.

The Council's management structure organisation is led by the Chief Executive Daljit Lally. The Food Service is delivered through the Public Health Protection Unit and Business Compliance & Public Safety Unit within the Housing & Public Protection Service, managed by Phil Soderquest the Head of Housing and Public Protection. The lead unit manager is Peter Simpson Public Health Protection Manager. The Commercial Team is managed by Principal Environmental Health Officer, Mark Mitchell. Its remit covers; food safety, food standards, port health, health & safety, Safety at Sports Grounds and infectious disease control. Other teams within Housing & Public Protection Service also contribute to food and feed enforcement, namely the Trading Standards and Animal Health Team, managed by Darin Wilson. Its remit includes food standards, fair trading, weights and measures, animal health and feed hygiene.

See **Appendix A** for details of the Housing & Public Protection Service organisational structure as it relates to the Food Service.

3.3 Scope of the Food Service

The Commercial Team has lead responsibility for enforcement work related to food safety and food standards matters. The Trading Standards and Animal Health Team lead on Feed.

The service is available to the public between Monday to Thursday 8.30am to 5.00 pm and Friday 8.30 am to 4.30 pm. Outside of these hours, messages can be left on voicemail or by e-mail or fax. Emergency arrangements are also in place through the Council's Customer Service Centre for incident reporting after normal working hours by dialing the single council contact number (0345 600 6400). Flexible hours working arrangement are in operation for staff. Whilst most inspections and other visits are made to businesses during the day, many are also carried out outside normal working hours in order to inspect businesses such as restaurants and takeaways that do not open through the day. Visits done as part of planned programmes are usually unannounced unless there are specific reasons to give prior notification.

All aspects of the Feed and Food Service are delivered from:-

Feed and Food Service office location:
<p>Public Health Protection Unit & Business Compliance & Public Safety Unit West Hartford Fire Station West Hartford Business Park Cramlington Northumberland NE23 3JP</p> <p>Telephone number: (01670) 623870 Fax number: (01670) 626059 e-mail: public.protection@northumberland.gov.uk</p>

The operational teams within the Housing & Public Protection Service are responsible for enforcement work related to food matters, including;

- planned visits to food businesses including full and partial inspections/audits
- other official control visits as defined in the Food Law Code of Practice issued by the Food Standards Agency (FSA) which include monitoring, surveillance, and verification visits
- the investigation and control of foodborne diseases including food poisoning outbreaks
- investigation of food complaints and food premises complaints
- sampling of food for microbiological contamination
- sampling of water at the Port of Blyth to ensure potable supplies on ships
- monitoring of pest control at the Port of Blyth
- the processing of sanitation certificates at the Port of Blyth
- maintenance of the food premises database
- responding to Food & Feed Alerts (issued by the Food Standards Agency)
- contributing to imported food controls through inspection and checks of imported foods at retail and catering premises
- enforcement of compositional standards (including safety) descriptions and labelling of animal feeding stuffs
- maintenance of a register in accordance with the Animal Feed (Hygiene, Sampling etc. and Enforcement)(England) Regulations 2015
- planned inspections of premises for food and feed hygiene having regarding for the Feed Law Code of Practice
- inspections relating to metrology and fair trading

- provision of advice and guidance to new and existing food businesses and the general public, including the promotion of 'Safer Food Better Business' the food safety management tool developed by the FSA.
- response to enquiries from other local authorities in relation to food manufactured in Northumberland
- contribution to wider public health agenda issues
- consultation responses to the Planning Section, Building Control and the Licensing Section
- publication of the results of food hygiene inspections in line with the National Food Hygiene Rating Scheme

3.4 Demands on the Food Service

There are over 3600 food premises in Northumberland subject to food safety and food standards regulation and in excess of 1700 businesses, mainly farm premises subject to the Animal Feed (Hygiene, Sampling etc. and Enforcement)(England) Regulations 2015. Due to the nature of the county there are a large number of seasonal businesses associated with holiday accommodation and tourism, including:

- Bed & Breakfast accommodation
- Seasonal restaurants and cafes
- Holiday let accommodation
- Caravan parks (static and touring) & camping
- Farm Stay accommodation
- Ice cream vans and kiosks

The Port of Blyth and the docks at Berwick do not import food products from outside the EU at the present time. Grain can be imported intermittently. There are two External Temporary Storage Facility (ETSF) in the County, however these currently deal in non-food products only. The food premises (safety & standards) profile at 1 April 2018 was:-

Premises Type	Number
Primary Producers	48
Manufacturers and Packers	160
Importers / Exporters	7
Distributors/Transporters	60
Retailers	759
Restaurants and Caterers	2611
Total: Food Safety & Standards	3645
Feed Hygiene Premises	1796
Total: Feed & Food	5441

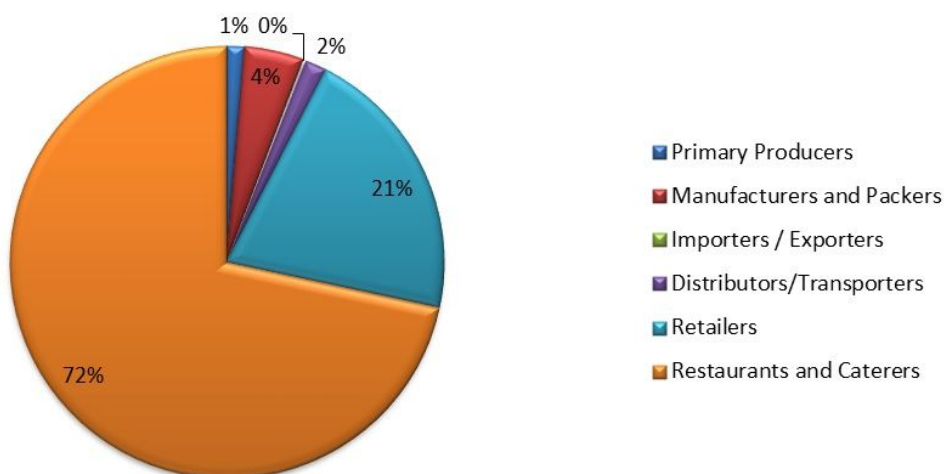
This includes 22 premises which require approval under specific European legislation to ensure they meet a higher food safety standard. They are categorised as follows: meat products (1), dairy products (4), fishery products (9), egg products (8).

Within the food premises these activities require a specialist approach:

- Large scale pastry and food products manufactures
- Fish smokehouses
- Egg Packers
- Cheese manufacturers
- Oyster bed
- Live and cooked shellfish

Excluding feed hygiene premises (which are not subject to detailed food safety or standards inspection), grouping the food premises into broader categories shows that most (93%) are retailers, restaurants, or caterers. These are predominantly small single businesses which require individual attention, particularly to food safety procedures and record systems during the inspection process. The figures also show that about 65% of food premises are in the rural areas of the County making travel a significant factor for the inspection service.

Food Premises (Hygiene & Standards) in Northumberland 2019



3.4.1 Food Safety

The Commercial Team received 1115 service requests in 2018-19, an increase of over 150 requests compared to 2017-18. Requests are usually for verbal

advice on food hygiene requirements; design, layout and materials used in catering areas; documentation; staff training; infectious disease control if food handling staff become ill; and toilet facilities for customers in new or altered premises. Information packs are sent out to general enquiries, including both food safety and food standards general advice. Visits are made depending on the complexity and risk of the proposed business.

The Food Law Code of Practice expects that once new businesses are operational or registered, inspection should be carried out within 28 days. The service operates a risk based system for new registrations to ensure high risk premises are inspected as a priority.

The service received 251 complaints about food in 2018-19, for example, foreign objects, food causing illness, the hygiene of food premises or food handlers. This is an increase compared to 2017-18.

3.4.2 Food Standards

Business enquiries for food standards advice remained stable in 2018-19, with the service responding to 118 requests. In addition the service requests were of a more complex nature as businesses were looking for advice on compliance with the Food Information Regulation EC.1169/2011.

The Service receives a steady number of complaints about food, for example, its labelling and/or description, issues with allergens or selling food past its best before date/use by date. As with the majority of complaints and service requests dealt by the service the response time is 3 working days from receipt. The service received 123 complaints about food standards in 2018-19.

Northumberland County Council acts as 'Home Authority' (see section 4.3) for a range of local food manufacturers who trade beyond the boundaries of the Council. In this role, help and advice is offered in respect of the composition of new and developing products, and their permissible labelling. The latter can place an uneven, heavy demand on officer time. The team would also take a lead role in the investigation of complaints by other Local Authorities about businesses for which the Council acts as Home Authority.

`Produced in Northumberland` is an initiative from Northumberland County Council which recognises Northumberland food producers and also businesses that use and promote food and drink that is made in Northumberland. The core of the scheme is a source verification carried out by lead auditor trained officers of the Public Health Protection Unit. Additionally scheme members must reach a compliant food safety standard so this provides additional reassurance to the public that food produced or retailed with this branding is both safe and sourced

locally.

In 2018/19 the scheme has started to reach national significance and was part of an event at the UK Parliament on 13th June 2018. Also officers regular promote the scheme at Northumberland food festivals and the County Show.

This verification scheme is offered to local businesses with the aim of raising the profile, value and public confidence in Northumberland food & drink. With regard to helping tourism within the County the scheme also helps to add value to the visitors overall experience of Northumberland as food & drink is such an important and memorable part of their visit.

3.4.3 Feed

In 2017 the National Trading Standards board agreed grants with the Food Standards Agency for local authorities to continue for another 3 years to undertake work at feed premises. The work is to concentrate on inspections for food and feed hygiene purposes.

The inspections of premises are carried out by the Trading Standards & Animal Health Team so that farm inspections could be combined for Food and Feed Hygiene. In 2018-19, 57 feed hygiene inspections were carried out, earning the Service around £43,500 funding from the FSA which included additional management and project work.

3.5 Enforcement Policy

The Authority has signed up to the Enforcement Concordat and the corporate Enforcement Policy embraces the policies and procedures detailed in the Concordat and the Regulators Compliance Code. This is publically available from the council website.

<http://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/Corporate-Enforcement-Policy-3-November-2015.pdf>

4.0 SERVICE DELIVERY

4.1 Interventions at Food and Feed Establishments

Local Authorities are required by the Food Standards Agency Food Law Code of Practice and Feed Law Code of Practice to document, maintain and implement an Interventions Programme for all food premises for which they have food law enforcement responsibility. The Commercial Food & Trading Standards and Animal Health Teams undertake interventions in accordance with relevant legislation, the code above and centrally issued guidance and to meet realistic targets given the available staff and resources and other service demands.

Different types of interventions (actions) allow Officers to use their professional judgement to apply a proportionate level of regulatory and enforcement action to each business. They are applied in a risk based manner such that more intensive regulation is directed at those businesses presenting the greatest risk to public health. Official controls include:-

- Inspections
- Audit
- Surveillance
- Verification
- Sampling
- Monitoring

Other interventions that are effective in supporting food businesses to achieve compliance with food law include:-

- Education, advice and coaching
- Information and intelligence gathering

This range of interventions allows Local Authorities to choose the most appropriate action to be taken to drive up levels of compliance, taking into account the recommendations in the Hampton Review “Reducing Administrative Burdens: Effective Inspection and Enforcement”.

4.1.1 Food Safety

Under Chapter 5 of the Food Law Code of Practice, premises are rated according to risk in Categories A-E, which determines their frequency of inspection as follows:

The full food safety premises risk rating profile at 1 April 2019 was:-

Category	Intervention Plan	Interventions required by risk category
A	Inspection at 6 monthly intervals	7
B	Inspection at 12 monthly intervals	73
C	Inspection at 18 monthly intervals	415
D	Alternate between official control and other interventions every 2 years.	1172
E	Alternative Enforcement Strategy every 36 months.	1787
Unrated (April 2018)	To be visited and risk rated.	145 (+ new businesses arising during the year)
Outside Programme		45*
Total		3645

* 'Outside Programme' are registered premises with no inspectable risk, for example haulage companies registering in case food is kept on a vehicle overnight.

In addition to the programme, interventions may be made in response to the following triggers:-

- consumer complaints
- change of ownership
- implication in a food poisoning outbreak
- a food alert
- change in business operations which may lead to a higher risk rating
- request for a re-rating under the Food Hygiene Rating Scheme

4.1.1.1 New Registrations

The Food Standards Agency Code of Practice requires that all new premises should receive an initial inspection and this should normally take place within 28 days of registration or from when the Authority becomes aware that the establishment is in operation.

Due to the increasing number of new registrations received by the authority, 530 food registration forms received in 2018-19, and the existing premises workload, the requirement to undertake initial inspections within 28 days does present a challenge to resources. This is particularly the case where there are a large

number of new business registrations that are received in respect of home bakers or childminders. These are likely to be low risk and when inspected and risk rated would most likely be Category E premises. As such these premises would require no further inspection in future years as they would be subject to the Alternative Enforcement Strategy approach (see 4.1.1.2)

On the 1st April 19 Northumberland had 146 unrated food premises. Of the outstanding 145 premises, 122 were received within the past 6 months. Of these premises 14 have been identified as likely to be 'high' risk based on usage type. Of the remaining 23 registrations 90% are likely to be low risk, again based on premises type. Any premises identified as 'high' risk is given priority by the inspecting officer to ensure resources are targeted where there is potential risk to public health.

Where there is a conflict for resources, all new registrations are allocated to the appropriate area officer, who would use the information provided on the form and by the food business operator, to determine when to carry out the initial inspection, giving priority to premises which in the officer's opinion present a high or medium risk, for example a public house serving meals, a cafe or restaurant. Low priority would be given to a child-minder who only provides a drink and snack and home bakers who do not produce any meat products for example.

4.1.1.2 Enforcement Strategy for low risk category E food safety premises

An alternative enforcement strategy has been adopted for dealing with Category E rated low risk premises. Alternative enforcement strategies (AES) are methods by which low risk premises establishments are monitored to ensure their continued compliance with food law.

It is not intended to preclude inspection, partial inspection or audit at such establishments where this would be the preferred official control option.

An establishment must have been subject to an initial formal inspection, and have been subsequently risk rated in accordance with Annex 5, of the Food Law Code of Practice before it can be determined to be a low risk establishment and therefore appropriate for it to be included in the alternative enforcement strategy.

Risk category E premises

All cat 'E' premises due for intervention 2019-20 will receive an alternative enforcement strategy. AES typically use questionnaires, with a sample of the businesses receiving a follow up visit to verify the information provided. This follow up visit can be recorded as a verification visit.

Visits may also be made to:

- any premises not returning a questionnaire
- any premises giving rise to a consumer complaint
- any premises where the returned questionnaire indicates significant changes in activities.
- any premises where a new food premises registration form is returned advising of a change in food business operator.

Specialised processes

Appropriate training, and refresher training, will be made available to officers required to inspect specialised processes in the county. Where training is not accessible appropriate expertise will be sought from suitable consultants.

4.1.1.3 Food Safety 2019-2020 intervention programme

The proposed 2019-2020 programme of work is detailed below:-

Category	Minimum intervention rating	Intervention type	Number of premises due	Target
A	At least every 6 months	Inspection, partial inspection, audit or sampling	7	100% planned inspections
B	At least every 12 months	Inspection, partial inspection or audit or sampling	73	*98% planned inspections
C	At least every 18 months	Inspection, partial inspection or audit or sampling	276	95% planned inspections
D	At least every 24 months	Alternate between official control and other interventions every 2 years.	551	90% Official Interventions
E	At least every 36 months	Alternative Intervention Strategy	430	90%
Unrated	Not known until inspection	Inspection	145**	90%
Total			1483**	

* The aim is to inspect 100% of premises due, but a lower target has been cited to allow for contingencies.

** Plus new businesses commencing during the year, estimated at 35 per month

The programme of inspections aims to meet the requirements of Chapter 5 of the Food Law Code of Practice.

The intervention programme figures will alter during the course of the year as a consequence of premises closing and as new food businesses open.

4.1.1.4 Other Food Safety interventions

In addition to the risk based intervention programme the team also carries out a number of other interventions to promote food safety and support businesses, for example.

- Increase the number of premises with a Food Hygiene Rating Score (FHRS) rating of 3 or more
- Carry out revisits to follow up non 'broadly compliant' businesses
- Respond to complaints and service requests within 3 working days of receipt
- Review local markets & events for food safety compliance
- On-going national, regional and local food sampling programmes

In 2019/20 we will continue to work with persistently low scoring premises Food Hygiene Rating Score (FHRS) rating of 0-2 to improve their standards as they not only pose significant risk to the public but also failure to improve may result in possible closure or prosecution.

4.1.2 Food Standards

Under Chapter 5 of the Food Law Code of Practice, premises are rated according to risk in Categories A-C, which determines their frequency of inspection as follows. The full food standards premises risk rating profile at 1 April 2019 was:-

Category	Intervention Plan	Interventions required by risk category
A	Inspection at 12 monthly intervals	72
B	Inspection at 24 monthly intervals	725
C	Alternative Enforcement Strategy (AES) every 5 years	2441
Unrated (April 2014)	To be visited and risk rated.	126 (+ new businesses arising during the year)
Outside Programme		331*
Total		3767

* 'Outside Programme' are registered premises with no inspectable risk, for example haulage companies registering in case food is kept on a vehicle overnight.

In addition to the programme, interventions may be made in response to the following triggers:-

- consumer complaints
- change of ownership
- a food alert
- change in business operations which may lead to a higher risk rating

4.1.2.1 New Registrations

Please see 4.1.1.1.

4.1.2.2 Enforcement Strategy for low risk category premises

An alternative enforcement strategy has been adopted for dealing with Category C risk premises. Alternative enforcement strategies (AES) are methods by which low risk premises establishments are monitored to ensure their continued compliance with food law. It is not intended to preclude inspection, partial inspection or audit at such establishments where this would be the preferred official control option.

An establishment must have been subject to an initial formal inspection, and have been subsequently risk rated before it can be determined to be a Category C establishment and therefore appropriate for it to be included in the alternative enforcement strategy.

All Cat C risk premises due for intervention 2019-20 will receive an alternative enforcement strategy. AES typically use questionnaires, with a sample of the businesses receiving a follow up visit to verify the information provided. This follow up visit can be recorded as a verification visit.

Visits may also be made to:

- any premises not returning a questionnaire
- any premises giving rise to a consumer complaint
- any premises where the returned questionnaire indicates significant changes in activities.
- any premises where a new food premises registration form is returned advising of a change in food business operator.

4.1.2.3 Food Standards 2019-2020 intervention programme

The proposed 2019-2020 programme of work is detailed below:-

Category	Minimum intervention rating	Intervention type	Number of premises due	Target
A	At least every 12 months	Inspection, partial inspection, audit or sampling	72	*98% planned inspections
B	At least every 24 months	Inspection, partial inspection or audit or sampling	337	90% planned inspections
C	At least every 5 years	Alternative Intervention Strategy	410	90% planned inspections
Unrated	Not known until inspection	Inspection	126**	90% planned inspections
Total			945**	

* The aim is to inspect 100% of premises due, but a lower target has been cited to allow for contingencies.

** Plus new businesses commencing during the year, estimated at 35 per month

4.1.2.4 Other Food Standards interventions

In addition to the risk based intervention programme the team also carries out a number of other interventions.

- Liaise with other County Departments on food standards matters as appropriate e.g. Facilities and Procurement (school meals & catering)

4.1.3 Port Health

The following work programme is proposed for Port Health:

- Visit 90% of high risk ships* entering the Port of Blyth
- Carry out monitoring of the Port of Blyth's pest control
- Contract sampling of the Port private water distribution network

* High risk ships are categorised as any vessel entering the port directly from a non-EU country or has a previous history of non-compliance.

4.1.4 Feed Hygiene

Under Section 5 of the Feed Law Code of Practice, premises are rated according to risk in Categories A-E, which determines their frequency of inspection as follows:

The Feed Hygiene at Primary Producer risk rating profile at 01 April 2019 was:-

Category	Intervention Plan	Interventions required by risk category
A	Inspection at 12 monthly intervals	1
B	Inspection at 24 monthly intervals, except where Type 1 earned recognition applies	8
C	Inspection at 36 monthly intervals, except where Type 1 earned recognition applies	7
D	Inspection at 48 monthly intervals, except where Type 1 earned recognition applies	21
E*	Inspection at 60 monthly intervals, except where Type 1, Type 2 earned recognition or NTMS applies	1282
Never Been Inspected		478
Total		1797

*Low risk premises mostly livestock farms.

The Feed Law Code of Practice introduced the term 'earned recognition' to provide business with good levels of compliance and members of an approved FSA Scheme to reduce the frequency of inspection to them.

The code of practice states the following:

Earned Recognition:

This is at the heart of the FSA approach to rewarding responsible businesses and encouraging industry to promote the positive role of regulatory standards;

Aims to reduce the burden on compliant businesses whilst concentrating enforcement activity at those businesses which are less compliant.

The Code describes two approaches as to how a feed business may qualify for Earned Recognition:

Type 1: a business which is a member of an FSA approved assurance scheme and demonstrates at least a satisfactory level of current compliance, with relevant feed law;

Type 2: a business which is not a member of an FSA approved assurance scheme and demonstrates a broad level of current compliance, with relevant feed law.

National Targeted Monitoring Strategy (NTMS): The NTMS is a mechanism to allocate appropriate resources to monitor compliance at low risk farm establishments (livestock and arable farms) achieving at least a satisfactory level of current compliance.

The code now allows low risk feed businesses (livestock & arable farms) who are part of an FSA approved scheme to have earned recognition allocated to them and a current level of compliance in accordance with the Code

In addition to the programme, interventions may be made in response to the following triggers:-

- Consumer complaints
- A feed alert
- change in business operations which may lead to a higher risk rating
- Additional funding from the Food Standards Agency.

The code additionally now allows certain premises to given a level of compliance without an inspection, this will remove a large number of unrated premises from the system and this piece of work will be completed during this year.

4.1.4.1 Feed Hygiene at Primary Producer 2019-2020 intervention programme

The Feed Law Code of Practice recognises earned recognition and the benefits it gives to businesses. Businesses which are part of a recognised FSA assurance scheme or are found on inspection to be broadly compliant have an amended frequency of inspection. As a result consideration to 5.3 of the Code will be given when deciding premises due for inspection each year.

The code provides an inspection programme to be based on a number of factors, such as premises type, current level of compliance and if they are a member of an approved FSA scheme. Depending on a premises type a premises will be inspected on a number of years basis, a percentage of that premises type or is if falls within the NTMS. As a result of this inspection are carried out after

completing a desktop assessment of the premises database, which the FSA then use to allocate a number of inspections to the Service.

The proposed 2019-2020 programme of work is detailed below:-

Category	Minimum intervention rating	Intervention type	Visits required by FSA
A	At least every 12 months	Inspection	2
B	At least every 24 months	Inspection	3*
C	At least every 36 months	Inspection	6*
D	At least every 48 months	Any official control (except where NTMS applies)	6*
E	At least every 60 months	Any official control (except where NTMS applies)	7*
Unrated	Not known until inspection	Inspection	16*
Total			40

* The visits required do not match the interventions due as part of the feed risk rating scheme. Visits required are calculated from a desktop assessment forming the FSA funding criteria, which is based on the current level of business compliance.

The service is aware of the National Enforcement Priorities for England and Wales 2019/2020 which is produced by the Food Standards Agency which looks at animal feed law enforcement (at all stages of production, processing, storage, transportation and distribution, including import and the primary production of feed) and food hygiene law enforcement at the level of primary production.

The Animal Feed National Priorities for 2019/2020 are;

- Effective information sharing, communication and exchange of intelligence to support effective official feed control delivery
- Validation of effective feed safety management systems with a focus on businesses supplying former foodstuffs or co-products
- Validation of effective implementation and maintenance of permanent written procedures based on HACCP principles
- Verification of the accuracy of feed labelling particulars
- Effective monitoring of consignments of feed originating from 3rd Countries, at points of entry

<https://www.food.gov.uk/business-guidance/national-enforcement-priorities-for-animal-feed-and-food-hygiene>

The service continues to carry out inspections based on the feed grant which may include a sampling programme. There is no specific sampling carried out by the service separate to this.

Since 2010 the Food Standards Agency via National Trading Standards(NTS), has funded local authorities an agreed amount to carry out a number of feed hygiene inspections. The project has been a great success, over 98% of local authorities participating in 2018/2019 and 99.3% of planned work was achieved.

A budget of £2.1m has been granted to NTS for 2019/2020 who coordinate delivery and payment.

Feed hygiene inspections are currently only carried out when funded by the Food Standards Agency, unless a complaint is received.

4.1.4.2 Other Feed Standards interventions

- FSA Food and Feed Hygiene Grant

The Food Standards Agency grant for 2019/2020 is made up of the following:

Northumberland Figures

Inland Feed	£9,605	33 Inspections
Primary Production	£1,540	7 Inspections
Port Work	£3,000	

Coordination Fee	£25,000
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Northumberland Total £39,145

As a region staff training is very important to ensure that they are competent to carry out their inspections under the Feed Law Code of Practice. Due to the changes in the inspection programme set out by the Food Standards Agency then it may be that the training is organised by the lead feed officer and authorities are charged for their attendance at the course.

In order to provide training to other, places on courses are available to local authorities outside of the region who will then pay for attendance

Where appropriate Animal Health Inspectors will carry out Food and Feed Hygiene inspections at premises which are subject to an Animal Health planned inspection, however the Food Standards Agency have directed that more inspections are carried out to inland feed premises.

Summary of resources required for Food and Feed Interventions

Intervention programme	Food Safety	Food Standards	Feed	Port Health	Technical support
Resources required (FTE)	5.5	4.2	0.5	0.8	1.0

4.2 Food and Feed Complaints

It is the policy of this Authority to investigate all complaints regarding food, food premises and feed premises in accordance with local policies and procedures and in line with Local Government Regulation guidance and the Home Authority and Primary Authority Principle.

We will respond to all food safety complaints reported to us following our local procedure with a view to:-

- Ensuring the wider public health has not been put at risk
- Preventing a recurrence
- Taking appropriate action under the Food Safety Act and/or relevant regulations

We will respond to all food standards complaints reported to us following our local procedure with a view to:-

- Ensuring that the composition of food meets legal requirements
- Preventing a recurrence
- Taking appropriate action under the Food Safety Act and/or relevant regulations
- Ensuring that food is accurately labelled and advertised

We will respond to all feed complaints reported to us following our local procedure with a view to:-

- a) Ensuring that feed is wholesome and correctly described
- b) Preventing a recurrence
- c) Taking appropriate action under the Animal Feed (England) Regulations 2010 and/or other relevant regulations

Summary of resources required for Food and Feed Complaints

	Food Hygiene complaints	Food premises complaints	Food Standards complaints	Feed complaints	Technical support
2015-16	106	119	62	0	-
2016-17	132	123	72	0	-
2017-18	110	117	132	1	-
2018-19	117	134	123	3	-
Resources required (FTE)	0.2	0.2	0.25	(incorporated into programme)	0.2

4.2.1 Use of other agencies

The Authority will call upon the expertise of its food examiners and public analysts as deemed necessary in the investigation of feed and food complaints. In addition the North East Food Liaison Group and Public Health England (formerly the Health Protection Agency) are sources of local expertise. NETSA (North East Trading Standards Association) a Regional liaison group comprising 12 Local Authorities, has a technical group that focuses on "Farm to Fork" issues, thus providing a further resource of expertise.

Where access to local expertise is not available, the Authority will seek the assistance and guidance of the Food Standards Agency and/or Local Government Regulation (LGR - formerly LACORS). The food service is also an active founder member of the Northumberland Business Alliance, which represents a range of regulatory and business organisations in order to improve consistency and reduce any unnecessary burdens on business.

4.3 Home Authority Principle and Primary Authority Scheme

Home Authority

With regard to trading standards and food safety matters, local government has developed a Home Authority scheme where the Home Authority is the authority where the relevant decision-making base of the business is located.

So for example, if the business is a sole trader and only has one site or office, the Home Authority will be the local authority where this site or office is located. For a business with multiple branches, stores etc. throughout the UK, the Home

Authority will generally be the local authority where the head office (or decision making centre) is located.

The scheme is designed to help businesses by providing contact points for advice and guidance in order to maintain high standards of public protection encourage fair trade and develop a consistent approach to enforcement. Northumberland acts as Home Authority for some 26 food companies, requiring maintenance of dialogue with management to update on operations, products and labels etc.

Primary Authority

Under the provisions of the Regulatory Enforcement and Sanctions Act 2008 Local Authorities may agree to become a “Primary Authority” for food businesses. The Commercial Team would respond to any requests to act as Primary Authority although currently it does not act as one.

Primary Authority companies can form a statutory partnership with a single local authority, which then provides robust and reliable advice for other councils to take into account when carrying out inspections or dealing with non-compliance. This leads to simpler, more successful local regulation. Businesses should be able to rely on the environmental health, licensing and trading standards advice received from local authorities, in the knowledge that it is expert opinion, applicable across the UK, and a secure basis for investment and operational decisions.

Summary of resources required for Home Authority and Primary Authority Scheme

Home & Primary Authority	Food Safety	Food Standards	Feed	Technical support
Resources required (FTE)	0.1	0.1	0.1	0

4.4 Advice to Businesses

It is the Authority’s policy to provide all necessary advice to food and feed businesses to help them comply with legislative requirements and the adoption of good practice.

Advice will be available during the course of all inspections and visits and also through [Northumberland County Council's website](#)

New food businesses seeking help are provided with advice and guidance on legislation and best practice (safety and standards), food hygiene training, premises registration, the Food Hygiene Rating System, and as needed useful contacts both within and outside the Council such as planning, building control, licensing and the Fire Service.

The service also has a wide range of information and trader advice leaflets available to businesses and consumers. Material is often displayed at information sites at local livestock markets on various subjects including feeding stuffs and animal health issues.

Press releases are also made when a topic is considered to be of general interest to businesses and consumers, or when a survey has revealed newsworthy issues.

Summary of resources required for Advice / Service Requests to Business

New business contacts	Service Requests – Food Safety	Service Requests – Food Standards	Service Requests – Feed Hygiene	Technical support
2015-16	992*	158	88	-
2016-17	968*	148	52	-
2017-18	905*	122	83	-
2018-19	1115*	123	64	-
Resources required (FTE)	0.4	0.25	0.1	0.2

* The number of service requests in relation to food safety includes new food registration forms.

4.5 Food and Feed Sampling

The Authority recognises the important contribution sampling makes to the protection of public health of residents and honest traders. Sampling is undertaken for the following purposes:-

- Microbiological sampling and examination of food is an important part of food safety enforcement which enables authorised officers to gain an insight into the microbiological safety of food and which may reveal shortcomings in its safe handling, preparation and/or storage.
- The sampling and analysis of food is undertaken for compositional quality and safety purposes and for determining compliance with regulations relating to labelling and claims is an essential part of food standards enforcement.
- The analysis and/or microbiological examination of complaint samples is often vital in the investigation of consumer complaints.

- With all livestock entering the food chain, sampling is an important area of work to ensure that animal feed does not contaminate the human food chain. In some instances, materials used in the production of animal feed have been illegal and led to the withdrawal of products.

The Authority will:-

- coordinate with other local authorities in the North East Food Liaison Group (microbiology sub-group) to agree local sampling surveys
- participate where possible in Public Health England (PHE) regional and national surveys
- coordinate for the purposes of food standards and feed with other local authorities in submitting samples to the Metrology Screening Laboratory
- participate in any sampling required by the Food Standards Agency

The sampling programme will have regard to the nature of food businesses in Northumberland and will focus on locally manufactured/produced foods and foods targeted as a result of previous sampling experience, complaints or centrally coordinated sampling initiatives.

Whilst placing a strong emphasis on local foods this risk-based approach will also include nationally and internationally produced foods where problems are suspected or identified. Where routine feed samples are taken, priority will be given for analysing levels of undesirable substances and feed additives. The priority for routine sampling is:-

- High risk businesses
- Consumer complaints
- Home Authority businesses
- Local producing businesses

A Service Level Agreement has been reached with PHE for the microbiological examination of food. This agreement involves the allocation of credits which are used for the examination of food and environmental samples as well as non-drinking water samples.

The Food Examiner for the Authority is:-

Public Health England Microbiological Services
 Food Water & Environment Microbiology Laboratory
 Block 10, The Food and Environmental Research Agency
 Sand Hutton
 York
 YO41 1LZ

The Public Analysts appointed by the Authority are:-

Public Analyst Scientific Services Ltd

i54 Business Park
Valiant Way
Wolverhampton
WV9 5GB

All laboratories are official food laboratories as notified to the EC under Council Directive 93/99/EC.

Summary of resources required for Food and Feed Sampling

Feed & Food sampling	Reactive sampling to complaints – food safety	Reactive sampling to complaints – food standards	Planned sampling - food safety	Planned sampling - food standards	Planned sampling - feed	Technical support
Resources required (FTE)	0.05	0.05	0.1	0.05	-	0.1

4.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

It is the policy of this Authority to respond to all cases of food poisoning or foodborne illness reported to the Council. This is carried out under the general direction, guidance and advice of the designated 'Proper Officer' appointed by the council in accordance with the Public Health (Control of Disease) Act 1984 (as amended). This is the Centre Director, North East Public Health England Centre and specified deputies. The principal contact is Dr Kirsty Foster, Consultant in Health Protection, Health Protection Team, Public Health England (PHE). Standard Operating Procedures are in place which detail the responses required for particular diseases.

Notifications from PHE and self-referrals are followed up either by posting information and advice, making a visit, or by telephone questionnaire depending upon the nature of the illness and risk assessment. This is carried out by food safety staff within the Commercial Team of the Public Health Protection Unit.

In the event of an outbreak the Authority will act in accordance with the Policy for the Control of an Outbreak of Communicable Disease, which was developed and agreed between PHE and the Northumberland, Durham and Tyne & Wear Local Authorities. The Principal Environmental Health Officer or representative will be a member of an Outbreak Control Team.

A representative of the team will attend the North & South of Tyne Area PHE liaison group. This group provides a link between the Consultant in Health Protection and the regional local authorities to determine and develop: policy; training; updating on legislative changes; case discussions aimed at consistency; statistical analysis of regional infections and advice on case control.

On the basis of previous year's figures infectious disease control will require the resources estimated below. This is reactive work and the number of cases requiring a response is outside of the service's control.

Typically 55-60% of the cases requiring a visit are located in the rural areas of the county, which can involve considerable travel.

The resources required for outbreak investigation is unpredictable. An outbreak of viral illness will be managed in the main by PHE, an outbreak associated with food (food poisoning) can take officers out of their routine work for extended periods. Food borne outbreaks are typically 2-5 per year. Typical actions following such a foodborne outbreak include:

- Liaison with PHE
- Attendance at Outbreak Control Team if declared (may be several meetings)
- direct contact with cases to gather information, this can be a large number where a group event is involved e.g. wedding reception
- food premises investigation to identify cause(s)
- food samples taken to confirm source food or water
- faecal specimens to be collected from cases and contacts as part of the epidemiological investigation and case finding
- sample transport to laboratory etc.
- formal action with the food business to prevent recurrence
- consideration of other enforcement

Summary of resources required for Infectious Disease Control

	Cases – officer investigation	Infectious disease outbreaks (inc viral outbreaks where no intervention required)	Cases - postal information only (Technical support)	Total
2015-16	111	32	330	473
2016-17	133	30	361	524
2017-18	130	69	396	595
2018-19	161	69	430	

Resources required (FTE)	0.2	0.1
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4.7 Food Safety Incidents

It is the policy of this Authority to:

- i) respond promptly to all Food Alerts issued by the Food Standards Agency; and
- ii) notify the Agency of any serious localised incident or wider food safety incident that has been identified

The Authority will comply with the Code and in accordance with Standard Operating Procedures. The response to Food Alerts will be appropriate to their category and to any specific instructions that are given. Food Alerts are received electronically by email via the Food Standards Agency to a dedicated email in-box.

It is difficult to estimate the resource required to respond to these alerts since this varies dependent upon the number and status of alerts received. Most alerts are for information only and do not require contact with businesses. However for example during 2012-13 a considerable response over several weeks was required for food standards officers in respect of the discovery of horse meat in food products.

Summary of resources required for Food Safety Incidents

Responding to feed & food incidents	Food Safety	Food Standards	Feed	Technical support
Resources required (FTE)	0.03	0.06		0.03

4.8 Liaison with Other Organisations

The Authority actively participates in local and regional activities. It is a member of the North East Food Liaison Group, its Microbiological and Food Standards Sub-Groups; attends meetings called by the Food Standards Agency (FSA) for food lead officers; the Public Health England North & South of Tyne Area Health Protection Group; North East Trading Standards Association (NETSA).

The Food Liaison Group meets quarterly to discuss technical issues and agree standards with the aim of ensuring consistency of enforcement throughout the North East area. The meetings are attended by regional representatives from the FSA.

The sub group looks at food sampling initiatives to assess the microbiological quality of food manufactured, distributed and retailed in the area and where appropriate to give advice and guidance to businesses.

NETSA has set up a number of technical focus groups to promote consistency of interpretation and enforcement and to coordinate projects in the Northeast Region. Meetings are held when necessary, but liaison via electronic means is the preferred option.

The Authority is also represented on the following;

- NETSA Animal Health Panel
- National Agriculture Panel
- Association of Port Health Authorities

There is also liaison with other organisations including the Chartered Institute of Environmental Health, the Trading Standards Institute, Local Government Regulation, Public Health England, Department of the Environment, Food and Rural Affairs, the Food Standards Agency and the Care Quality Commission for Social Care Inspections.

Officers also work in liaison with other teams within the service particularly the Planning, Building Control and Licensing Sections, and other services such as the Fire and Police services and the Council's Facilities Management service (school catering).

Northumberland has acted as the coordinator for the region with regard to feed hygiene and has received a sum of £25,000 to cover the cost of the co-ordinators time, effort and management of the project. This has resulted in a considerable increase in the amount of time spent by the Senior Animal Health Inspector on liaison, regionally and nationally.

Summary of resources required for Liaison

Liaison with professional bodies (preparation, attendance, actions)	Food Safety & Infectious Disease control	Food Standards	Feed	Technical support
Resources required (FTE)	0.1	0.1	0.6	0.1

4.9 Food and Feed Safety and Food Standards Promotion

The promotion of food and feed safety and food standards will be achieved through local initiatives and publicity and by supporting national initiatives. The Authority is committed to further developing promotional opportunities where possible.

Promotional activities will continue to include participation in:

- Promotion of Safer Food Better Business

Safer Food, Better Business, the FSA's food safety management guidance for businesses, is actively promoted during each planned intervention as it is usually the choice of food safety management system for most food business operators. The catering pack is available in English and Chinese, but it is also tailored for Asian cuisine, childminders, and care homes. There is also a version for the use of retailers.

Currently there are limited numbers of hard copies of the catering pack available for new businesses, as such we are concerned that as this guidance is still primarily only available online from the FSA, rather than in hard copy, which may discourage businesses from using the system.

- Food Hygiene Rating System (FHRS)

The above scheme was introduced on 2 April 2012 and the scheme involves the scoring of businesses on their management systems, their standard of cleanliness and their hygiene practices. The scoring is then translated into a rating from zero, where major improvement is needed, to 5, which is very good. Businesses receive a sticker showing their rating, which they are encouraged to display.

The aim of the scheme is to promote self-improvement by businesses.

- 5 – hygiene standards are very good
- 4 – hygiene standards are good
- 3 – hygiene standards are generally satisfactory
- 2 – some improvement is necessary
- 1 – major improvement is necessary
- 0 – urgent improvement is required

Administration of the scheme includes producing printed stickers, associated correspondence and data handling.

- Information and guidance posted on website

A wealth of information exists on the Northumberland County Council website covering Environmental Health and Trading Standards issues. The entire site has been reviewed and the information provided refreshed to make it more user friendly and much easier to navigate and find information. We will continue to try and improve our existing online resources and provide new content when possible.

Summary of resources required for Promotion

Food safety & standards promotion	Food Safety	Food Standards	Technical support
Resources required (FTE)	0.05	0.05	0.5

4.10 The 'Produced in Northumberland' Verification Scheme

'Produced in Northumberland' is a business support initiative that recognises Northumberland food producers and also businesses that use and promote food and drink that is made in Northumberland. The verification scheme is delivered by the Public Health Protection Unit and is offered to local businesses with the aim of raising the profile, value and public confidence in Northumberland food & drink.

The Unit also works in partnership to actively support and promote the scheme. A scheme focus group that is made up of local food businesses.

The Council has trademarked both the Produced in Northumberland and Produced in Northumbria as certification trademarks.



At the core of the scheme and what makes it unique at this time is the scheme is underpinned by a thorough food source verification audit that any aspiring business must pass. The officers within the Public Health Protection Unit carry out the verification audits who are trained to Lead Auditor standard that means that the audits are to the standard of the ISO 22000 family of food management standards. In particular ISO 22005 - Traceability in the feed and food chain.

As well as the requirements of the verification audits any business must pass a food safety threshold. That is, they must have at least a 3-star food hygiene rating. So the scheme also offers assurance to the public of the safety of the food & drink products provided by member businesses.

Food Hygiene Rating	Percentage of PIN members
FHRS 5	87%
FHRS 4	10%
FHRS 3	3%

Producers who are members of the scheme have to prove to auditors who visit their premises that the food and drink is made in Northumberland. For butchers, checks are carried out on the origin of the animals from which their meat comes.

Produced in Northumberland is intended to contribute to the success of the tourism sector. In 2016 tourism contributed £307 million to the local economy.

Tourism businesses (including restaurants, hotels, guest houses, B&B's and food & drink retailers) who join the scheme are provided with a mark of recognition for their customers that they believe in the quality of the food and drink that is Produced in Northumberland. The hospitality businesses have to prove that a certain number of main foods used on their menu are produced in Northumberland. For example in the case of a B&B it could be that the sausage, eggs and kippers are produced in Northumberland.

Retailers who are part of the scheme are expected to provide food and drink that is made in Northumberland by a variety of different producers. It is recommended that these are identifiable by use of the 'Produced in Northumberland' logo e.g. a designated 'Produced in Northumberland' section within the shop.

Our goal is to obtain national recognition of the unique regional distinctiveness of Northumberland food & drink. It is hoped that by encouraging local businesses to use Northumberland food and drink this will make a positive approach in reducing food miles, lead to increased production and sales within the local economy and ultimately job creation in an area that relies heavily on tourism.

For further information and a list of food & drink businesses visit:

www.producedinnorthumberland.co.uk

Summary of Resources required for Produced in Northumberland

Produced in Northumberland	Verification	Administration
Resources required (FTE)	0.9*	0.4*

*The verification scheme currently has no dedicated admin support and the 0.4 FTE is provided by the inspectors themselves. Given the ongoing expansion of the scheme it is estimated that both the verification and admin FTE will continue to be increased in year.

5.0 RESOURCES

5.1 Financial Allocation

The annual expected expenditure the Food Service for 2019-2020 is:-

Staffing costs (approx. including on costs)	£677 016*
Travel	£ 19 621
Contractor & casual staffing costs	£ 15,000
<u>Sampling & Analysis</u>	<u>£ 12,680</u>
Total service cost	£724 317

5.2 Staffing

The total staff resource allocated to the delivery of the work detailed in this plan is estimated to be approximately 15.47 full time equivalent (FTE) posts as shown in the tables below. The total including contractor/casual staff is shown in brackets.

Work area	Team Manager (TS & AH Team)	Senior Animal Health Officer	Trading Standards Officer	Animal Health Officer	Technical Support officer
Feed	0.08	0.6	0.25	0.3	0.1
Feed total (FTE)	1.33				

Work area	Principal EHO (commercial team)	Senior Environmental Health Officer	Environmental Health Officer / EHTO	Port Health Officer	Technical Support Officer
Food Hygiene	0.6	1	3.7		1.33
Infectious Disease			0.15		0.1
Port Health				0.9	
Food sampling			0.05	0.1	0.1
Total	0.6	1	3.9 (1)	1	1.53
Food Safety total (FTE)	8.03 (9.03)				

Work area	Team Manager (Commercial Team, TS & AH Team)	Trading Standards Officer	Fair Trading Officer	Technical Support officer
Food Standards	0.5	3.41	1.5	1
Food Standards total (FTE)	6.41			

5.3 Staff Development Plan

Training and development needs are identified by annual Appraisals and by ongoing assessment and monitoring throughout the year. Where specific training is identified, including refresher training, this becomes a requirement of their continuing authorisation as a service officer, the extent and currency of training is reviewed at the officer's annual appraisal.

Food Safety Officers/Environmental Health Officers, Food Standards Officers/Fair Trading Officers, will receive a minimum of 20 hours and Animal Health Inspectors 10 hours, on-going/update training for Continual Professional Development and this will take the form of in-house training (including personal research), external courses, and joint training initiatives with the North East Local Authorities.

6.0 QUALITY ASSESSMENT

6.1 Quality Assessment

There are management arrangements in place to assess the quality of an officer's work and to ensure compliance with the Code of Practice, this is documented in the 'Monitoring the Quality of the Service' procedure. The Commercial Team & Trading Standards and Animal Health Team hold bi-monthly team meetings at which issues relating to consistency and competency are routinely discussed.

A system to allow service users to provide their perceptions of the Authority's performance has been introduced in the form of an on-line survey questionnaire. This is being requested through contact letters and emails following inspections and complaint / service request completion.

7.0 REVIEW

7.1 Review of the Food Service Plan 2018-19

The respective Unit service managers and Head of Service annually review performance against the Plan. Regular reviews of food hygiene performance against targets will take place at team level. Where there are variances from the Plan the Unit Managers and Head of Service will be informed together with details of any action necessary to address the variance.

7.1.1 Food Safety

7.1.1.1 Inspections in 2018-19 (Food Safety)

Type	Programmed	In Year changes	% Target	Actual	% Completed
High Risk Category A	3	5	98%	8	100%
Category B	64	-	98%	64	100%
Category C	291	-	95%	286	98.2%
Category D	612	-	90%	597	97.5%
Category E	402 (AES)	-	90%	402	100%
Unrated	260 (693)	433*	95%	547	99%** (78.9%)

* New businesses commencing during the year, all new registrations are risk assessed and prioritised. High or medium risk, for example a public house serving meals, a cafe or restaurant is inspected as a priority. Low priority would be given to a child-minder who only provides a drink and snack and home bakers who do not produce any meat products for example.

** Percentage completed based upon tagged unrated at the beginning of the year. Remaining premises are not yet in operation, have closed and reopened or are very low risk.

Overall the service completed the years 2018-19 food hygiene inspection programme. Any overdue inspections will be carried out as a matter of priority in the 2019-20 work plan.

7.1.1.2 Unrated Premises

New and unrated premises have continued to require a lot of resource from the service, with the team receiving on average 36 new food registrations a month in 2018-19. This is 6 more a month than originally estimated. The number of new registrations peaked at 46 in October 2018. The difficulty in dealing with premises has been exacerbated by premises registering, then not going into operation until a substantial amount of time after registration.

In addition work has been put in to inspect and provide advice only for the business never to open or to close within the financial year.

7.1.1.3 Enforcement

As a result of programmed food hygiene inspections, as well as service requests and complaints investigated by the Food Team, in 2018-2019 food businesses were issued with the following enforcement activities.

Enforcement Action	Totals
Written warning*	1224*
Voluntary closure agreement	8
Improvement Notices	47

* Includes onsite reports left at the time of inspection where non compliance was identified.

7.1.1.4 Complaints (food safety & standards)

117 complaints regarding food hygiene, 134 complaints about food premises were received and 123 complaints about food composition, labelling or quality. 99% of these received an initial response within 3 working days in accordance with Service Standards.

7.1.1.5 Service requests for advice (food safety and standards)

1238 requests for advice were received, 98% were responded to within 3 working days in accordance with service standards.

7.1.1.6 Sampling

A total of 290 microbiological food samples were taken in 2018-19. These were a mixture of local, regional and national sampling programmes. These projects included;

- **National Study 64 - Pastry** - Ready to eat pastry based foods from catering and retail premises
- **National Study 65 - Env Swabs Catering** - Swabbing in Catering Premises
- **National Study 66 - Frozen Fruit & Vegetables** - Frozen fruit and vegetables from retail and catering premises
- **Regional Study XR33 Touch Screens** - Tough Screens and PIN key pads in catering and retail premises
- **Regional Study XR34 Milkshakes** - Premises preparing and serving Milkshakes
- **Regional Study XR35 Minced Meat** - Minced Meat and Meat Preparations to assess compliance with EC 2073/2005

The programme with the most interesting results consisted of samples taken of milkshakes. Milkshakes are a popular food that are prepared and served by many outlets. Milkshakes often include component ingredients including milk, ice cream, frozen yoghurt, flavoured syrups, fruit purees, fresh fruit and confectionary. In addition they are typically prepared using blenders which can be complex to clean. The survey aimed to assess the microbial quality of freshly prepared milkshake. In total 19 samples were taken from 3 premises, consisting of both food samples and environmental swabbing. All 3 premises had unsatisfactory environmental and two premises had unsatisfactory milkshake samples. In each case the issue was around the complexity of the equipment and the cleaning method used. Advice was provided in each case to identify the issues and resamples taken until satisfactory results were returned..

7.1.1.7 Promotional Activities

- Safer Food Better Business (SFBB)

Work continues to promote 'Safer Food Better Business' during inspections, revisits and service request visits. SFBB is a food safety management tool produced by the Food Standards Agency for small businesses to help them comply with legislation that requires a written management system to be in place. It is based on HACCP principles and helps businesses to identify where problems may occur.

- General Advice

A series of advice / information leaflets are available to food businesses.

- Food Hygiene Rating System (FHRS)

This is a national scheme; full details are available on their website www.food.gov.uk/ratings . In the county the scheme is applied to 2977 food

premises giving them a food hygiene star rating. 2911 food businesses out of the total achieved three, four or five star ratings (97.8%) which means the vast majority of our food businesses are compliant.

This scheme includes all businesses that supply food direct to the consumer but some businesses are exempt, based on the low risk nature of food business activities, for example, chemists.

The FHSR breakdown of ratings is as follows:

Star rating	Description	Number of premises
5	Very good	2463
4	Good	363
3	Generally satisfactory	85
2	Improvement required	22
1	Major improvement required	38
0	Urgent improvement required	6

As of 1 April 2019 please see a breakdown below of the percentage of 3-5 rated premises for Northumberland, NE Region and England;

Area	Percentage of 3-5 rated Premises
Northumberland CC	97.8%
North East Region	96.6%
England	95.0%

- Website

We have continued to develop our web pages throughout the 2018-19 financial year, adding new content and updating pages where there have been changes in legislation or guidance.

7.1.1.8 Infectious Disease Investigation

591 notifications of infectious disease were received by the Public Health Protection unit. Of these notifications 161 (27%) required an officer investigation. This involves: contacting the case to obtain information about their symptoms, food history, contacts and occupation then giving advice on preventing the spread of the illness and in some cases e.g. food handlers, requiring them to remain off work until clearance specimens have been provided. A total number

of 69 outbreaks were notified, with the vast majority occurring in institutional settings, and were viral in nature spread person to person.

7.1.2 Food Standards

7.1.2.1 Inspections in 2018-19 (Food Standards)

Type	Programmed	In Year changes	% Target	Actual	% Completed
Cat 'A'	78	-	98%	78	100%
Cat 'B'	308	-	90%	300	97%
Cat 'C'	630 (AES)	-	95%	630	100%
Unrated	137 (593)	456*	90%	467	99%**

* New businesses commencing during the year

** Percentage completed based upon tagged unrated at the beginning of the year. Remaining premises are not yet in operation, have closed and reopened or are very low risk.

Overall the service completed the years 2018-19 food standards inspection programme.

7.1.2.2 Unrated Premises

Please see 7.1.1.2

7.1.2.3 Enforcement

As a result of programmed food standards inspections, as well as service requests and complaints investigated by food officers, in 2017-2018 food businesses were issued with the following enforcement activities.

Enforcement Action	Totals
Written warnings*	360*
Voluntary closure	0
Improvement Notices	3

* Includes onsite reports left at the time of inspection where nonconformities were identified.

7.1.2.4 Complaints

Please see 7.1.1.4

7.1.2.5 Service Requests

123 requests for advice were received, 98% were responded to within 3 working days in accordance with service standards. It is worth noting that food standards service requests tend to be complex in nature requiring detailed advice on how the premises can comply with regulations.

For more details please see **7.1.1.5**

7.1.2.6 Sampling

In 2018-19 the authority completed its local and regional sampling programme. A total of 12 samples were taken within Northumberland, including samples taken as part of both Northumberland's local programme and the regional sampling programme. Samples taken included;

- Speciation tests
- Acrylamide testing in potato and cereal based products as well as coffee
- Importers & Exporters Labeling Checks
- Allergens
- Vegan products for milk/egg proteins
- Acrylamide in Curry Sauces
- Cannabidiol authenticity to ensure customers not just buying a vegetable oil and the THC levels.

7.1.2.6.1 Sampling of Indian Curry for presence of Allergens

In 2017 6 samples of currys were purchased and tested for peanuts due to issues all over the country with this allergenic ingredients.

Four out of the six samples were found to contain peanuts even though the meal was asked specifically to be without peanuts as such investigations were undertaken into the sellers of the meals.

Due to the nature of the investigations it was not until 2018, three out of the four samples were taken to court, one case went to the Crown Court.

The three cases resulted in fines and investigation costs totalling £14,150, along with a number of press articles in relation to the cases.

During the early part of 2019, re-visits were carried out to reach of the premises still trading, one business stated it could not supply a meal without nuts and the samples purchased from the other premises were found not to contain peanuts when analysed.

The service still continues to receive complaints in relation to allergens and works with businesses to provide advice and guidance in this specific area.

Due to the growing number of incidents of consumers having a reaction to peanuts in Indian meals across the country the Trading Standards team carried out a programme of sampling to see if there was a problem in Northumberland with this type of takeaway meal. Six premises were visited, selected because they had all been previously inspected and advised on allergens and allergen control.

7.1.2.6.2 Illicit Alcohol

Illicit alcohol is still being sold in Northumberland. This in the main was branded spirit bottles being topped up with other cheaper brands, sometimes with an unknown origin. It is probably worth saying that due to the work which has been put into this area, the problem does not appear to be as bad as in previous years.

However the service had taken one public house to court this year due to it selling illicit alcohol. This resulted in the business being fined £690 with investigating costs of £2548. Another business was issued with a written warning for selling illicit alcohol.

7.1.3 Feed Hygiene

7.1.3.1 Inspections in 2018-19 (Feed Hygiene) - FSA Funded

Type	Programmed	Actual	% Completed
High Risk Category A	0	0	100%
Category B	1	1	100%
Category C	1	1	100%
Category D	4	4	100%
Category E	2	3	100%
Unrated	74	*62	86%

* actual is lower due to less demand for funded inspections by FSA

The original Feed Law Code of Practice was introduced in 2014 by the FSA. In order to reduce the burden on businesses all feed hygiene inspections planned to livestock premises in 2018-19 were combined with an animal health inspection.

The Food Standards Agency moved their priorities to inland feed premises and in these cases a pre-arranged inspection to the business was carried. In total 71

inspections were carried. This means that service achieved 86.5% of its planned inspections.

7.1.3.2 Enforcement

As a result of programmed feed hygiene inspections, as well as service requests and complaints investigated by feed officers, in 2018-2019 feed businesses were issued with the following enforcement activities.

Enforcement Action	Totals
Written warnings*	28*
Voluntary closure	0

* Includes onsite reports left at the time of inspection where non conformities were identified.

7.1.3.3 Sampling

In 2018-19 the service took no samples of feed materials on behalf of the FSA as they directed their sampling to ports which import feed.

7.2 Variations from the Service Plan

7.2.1 Food Safety

There was no variation from the plan, all work was achieved. Unrated premises have continued to be a huge drain on resources with new registration forms peaking as 45 in one month. All unrated premises were assessed and higher risk premises identified and prioritised. All remaining unrated inspections from the 2018-19 plan have been carried over into the 2019-20 inspection plan and have been allocated as a high priority.

7.2.2 Food Standards

There was no variation from the plan, all work was achieved

7.2.3 Feed Standards

There is by nature small variations from the plan, this is due to other local authorities not achieving their own inspections. This can mean that additional inspections are undertaken by NCC, to ensure as far as possible that the grant is spent rather than being returned. Also there were in year changes due to FSA not funding as many inspections as previously thought.

7.3 Areas for development

The following areas for service development have been identified:-

- Continue to develop the service in line with the principles of Better Regulation.
- Continue to improve the quality of data held on the database
- Continue to develop new ways of working to improve service provision
- Continue to expand and further develop the 'Produced in Northumberland' verification scheme.

7.4 Produced in Northumberland

2018/19 was a very successful year for 'Produced in Northumberland'. As with last year, the scheme has continued to grow with more and more businesses joining, from 73 members at the start of the year to 96 at the end. This is the biggest in year increase seen since the launch year. This is predominantly food & drink producers however there are now a growing number of hospitality and retail premises that are members of the scheme.

PIN Members	Total
Verified	96
Provisional Verification	0
Pending	1
Expressions of Interest	15*

*Recent expressions of interest.

In 2018/19 the scheme had a 95% retention rate in its membership.

Working in partnership with colleagues in tourism and communications, officers of the Public Health Protection Unit have attended over 10 food events across the North East promoting the scheme. The emphasis has been on the fact that scheme members provide local produce guaranteed as such through the verification scheme. This included the Northumberland County Show on the 28th May 2018, which the service will be attending again in 2019.



Photograph taken at the 'Northumberland County Show' 28 May 2018

From feedback at events the public have been really positive about the scheme as it allows them to make an informed decision when purchasing food and gives them confidence that the food they buy has truly been 'Produced in Northumberland'. At Hexham market on 12 September 2018 the scheme was show cased to HRH The Prince of Wales.



Photograph taken at the 'Hexham Market Showcase' 12 September 2018

The benefits and importance of the scheme have been recognised at a local and national level, culminating in a visit to the Houses of Parliament on 13 June 2018. This saw the 'Produced in Northumberland' scheme being showcased to MP's and government ministers who were able to find out more about the fantastic local businesses and top quality produce that is available from Northumberland. Eight business members of the scheme attended the event showcasing their local food products.



Photograph taken at Parliament, London, 13th June 2018.

As we move into 2019-20 officers will continue to contribute to promotional activities and publicity to expand the scheme and look forward to working in partnership with various other departments to increase the success of 'Produced in Northumberland'.

Produced in Northumberland financial 2018-19

Resource	Budget
Staffing costs	£52 438
Income from membership	-£10,797
Balance	£41 641

As can be seen above the delivery of the verification scheme cost a net £41,641 to operate in 2018-19. This was met from existing budget.

7.5. Customer satisfaction survey results 2018/19

Customer Satisfaction Survey Results - Inspections

FH & FS Inspections - Questions	Strongly Agree	Agree	Disagree	Strongly Disagree	Not Applicable / Don't Know
Officer clearly explained actions	77%	17%	0%	1%	5%
Received a high level of customer service	80%	18%	0%	1%	1%

Note - The service had a total of 114 responses from its customer satisfaction survey for the inspection programme (out of 1390). A 6.3% return rate.

With regard to food hygiene and standards inspections 94% of businesses either strongly agreed or agreed that officers clearly explained their actions and 98% either strongly agreed or agreed they received a high level of service. In both cases no business disagreed or strongly disagreed with either question.

Customer Satisfaction Survey Results - Service Requests & Complaints

Service Requests & Complaints - Questions	Strongly Agree	Agree	Disagree	Strongly Disagree	Not Applicable / Don't Know
Officer clearly explained actions	85%	12%	2%	0%	1%
Received a high level of customer service	76%	17%	0%	2%	5%

Note - The service had a total of 122 responses from its customer satisfaction survey for reactive service requests & complaints (out of 1386). A 1.5% return rate

For service requests 97% of customers either strongly agreed or agreed that the officer explained their actions clearly and 93% strongly agreed or agreed reported they had received a high level of customer service.

7.6 North East Regional Benchmarking Results

A benchmarking exercise of the seven NE councils was organised by Northumberland acting as chair of the NE Food Liaison Group. The data presented below shows two key benchmarks that show both the numbers of Inspector FTE (Full Time Equivalent) for food hygiene inspections across the councils together with a comparison of performance for food hygiene inspections in the 2018/19 plans of each local authority.

7.6.1 Number of Food Safety Inspectors FTE per food premises

	Northumberland	North Tyneside	South Tyneside	Newcastle	Sunderland	Gateshead	Durham
Food Safety FTE	5.5	4	Awaiting Figures	5.3	3.7	5.1	10.3
Total no of food premises	3645	1387		2485	2121	1651	4421
Premises per FTE*	663	462		578	573	323	429

* UK national average is **403** food businesses per officer FTE.

This benchmarking exercise shows that Northumberland has the highest officer to premises ratio of any of the seven local authorities. This should be considered within the context of the additional geographical challenge of the largest area of the seven local authorities (Sec 3.1, page 6). Therefore in terms of this particular benchmark the Council team is providing value for money.

7.6.2 Food hygiene inspection performance 2018-19

FH inspections 17-18	Northumberland	North Tyneside	South Tyneside	Newcastle	Sunderland	Gateshead	Durham
CAT A	100% (8)	100% (2)	Awaiting Figures	100% (4)	100%	100% (4)	100% (14)
CAT B	100% (64)	100% (62)		100% (87)	100%	100% (33)	99.52% (206)
CAT C	98% (291)	82% (162)		92% (341)	95%	100% (136)	99.66% (592)
CAT D	97% (612)	87% (412)		70% (579)	76%	83% (521)	69.85% (990)

*percentage of the total in the 2018/19 inspection programme

** actual number of inspections in the 2018/19 inspection programme

The above benchmarking shows a number of key comparatives.

- That for high risk premises (Cat A & B) most teams including Northumberland achieved 100% which is of assurance in terms of public health protection.

- For medium risk premises (Cat C) 82 - 100% was achieved with Northumberland at 98%.
- For low risk premises (Cat D) 69 - 97% was achieved with Northumberland hitting its 90% target and achieving the highest with 97%.
- All the statistics were achieved despite Northumberland having the highest premises per officer ratio within the region.

GLOSSARY OF TERMS

- Alternative Enforcement

In this context a means of assessing compliance with food law by means of self-assessment or provision of advice to the food business operator, via a questionnaire or letter

- Broadly Compliant

A premises which has good compliance with food law

- Due Diligence Defence

The due diligence defence is available to anybody accused of a breach of food safety regulations. Essentially, the defence is that the accused took all reasonably practicable steps to avoid the breach.

- Food Standards Agency Framework Agreement

The Framework Agreement on Local Authority Enforcement provides the Agency with a mechanism for implementing its powers under the Food Standards Act to influence and oversee local authority enforcement activity.

- Food Alerts

Food Alerts are the way the Food Standards Agency tell local authorities and consumers about problems associated with food and, in some cases, provide details of specific action to be taken.

They are issued 'For Information' where a solution to the problem has been put in place or 'For Action' where intervention by enforcement authorities is required. They are often issued in conjunction with a product withdrawal or recall by a manufacturer, retailer or distributor.

- Food Standards Agency

The Food Standards Agency is an independent Government department set up by an Act of Parliament in 2000 to protect the public's health and consumer interests in relation to food.

- High risk premises

A food business which falls into risk category A or B, inspected every 6 or 12 months. May be a premises with poor standards (and thereby subject to enforcement action) or a use a high risk process and/or have a vulnerable customer base.

- Local Authority Enforcement Monitoring System

LAEMS is a web-based system used to report local authority food law enforcement activities to the Food Standards Agency. Local authorities upload data, that has been generated from the local system, 'CIVICA' on which they record data on food law enforcement activities, to LAEMS. Once uploaded to LAEMS, the local authority data are aggregated to the pre-defined categories required by the FSA, including 'interventions', 'sampling' and 'enforcement'.

- Medium risk premises

A food business which falls into risk category C, subject to an official control such as a full inspection or audit every 18 months, this is where the bulk of our restaurants, cafes etc. are rated.

- Non-Compliant

In breach of food law requirements. Further action needed by the food business operator to avoid formal enforcement action.

- Regulators' Compliance Code

The Regulators' Compliance Code asks regulators to perform their duties in a business-friendly way, by planning regulation and inspections in a way that causes least disruption to the economy.

- Safer Food Better Business

Safer food, better business (SFBB) is an innovative and practical approach to food safety management. It has been developed to help small businesses put in place food safety management procedures and comply with food hygiene regulations.

- UKFSS

The UK Food Surveillance system (UKFSS) is a national database for central storage of analytical results from feed and food samples taken by enforcement authorities (local authorities and port health authorities) as part of their official controls. Information about the sample and the results of analysis are entered onto the system, and then validated, using the data entry tool.

- Unrated Premises

The unrated premises are those which have recently opened or changed proprietor since the last inspection. These are identified via new food premises registrations or identified by an officer which on district. These premises are, where notification takes place, visited initially and are assessed according to risk for further inspection.

- Verification

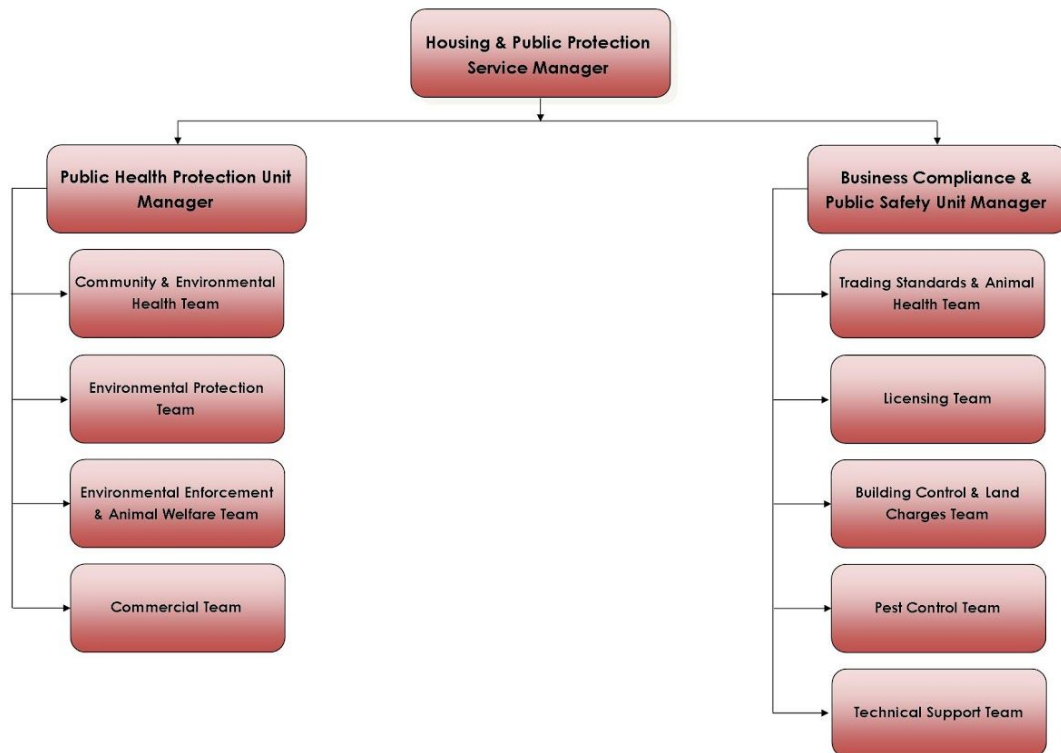
The checking, by examination and the consideration of objective evidence, whether specific requirements have been fulfilled

- Written Warning

Any relevant communication with the proprietor/owner/manager of a premises stating that infringements of legislation have been detected.

APPENDIX A: Organisational Structures

A. Housing & Public Protection Service - Public Protection Units.



B: Commercial Team Structure



C: Trading Standards & Animal Health Team

