



**Peterborough City Council
&
Cambridgeshire County Council
&
Rutland County Council**

**FOOD AND FEED LAW ENFORCEMENT
SERVICE PLAN 2018 - 2021**

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INTRODUCTION

This plan sets out how Peterborough City Council (PCC), Cambridgeshire County Council (CCC) and Rutland County Council (RCC) will meet their statutory responsibilities for food and feed law enforcement. These responsibilities include food safety and food standards as well as maintaining the safety of the feed chain to ensure the health of livestock and people.

This plan covers environmental health responsibility for food safety in Peterborough and Rutland only; Cambridgeshire food safety is managed by District Councils. It also covers Trading Standards' responsibilities in terms of food standards and feed hygiene and safety across Cambridgeshire, Peterborough and Rutland.

All three local authorities have a statutory duty to make adequate provision for the enforcement of food safety and food standards legislation. This is done in accordance with the food law code of practice, the framework agreement on local authority food law enforcement, published by the Food Standards Agency (FSA), and the Feed Law Code of Practice.

1.0 - Aims and Objectives of the Food and Feed Law Enforcement Service Plan

1.1 Aims and Objectives

1.1a Food

Food law enforcement is carried out by Peterborough City Council's Environmental Health professionals and Trading Standards professionals within the newly merged Cambridgeshire and Peterborough Trading Standards Service. Both Trading Standards and Environmental Health sit within Peterborough City Council's Regulatory Services team and deliver services on behalf of Rutland County Council.

In respect of food law enforcement, the service aims are:

“To promote and maintain the supply of food which is safe to consume, and supplied in a fair trading environment for all who live, purchase food or do business in Peterborough, Cambridgeshire and Rutland”

1.1b Feed

The integrity of the feed chain is a core area of work for Trading Standards and is of fundamental importance to the regional economy. Maintaining the safety, composition and integrity of feed is an essential contributor to the long-term health of the people and livestock of Cambridgeshire, Rutland, Peterborough and beyond, as well as being fundamental in upholding the international

reputation of British exports.

Whilst making the service accessible to as wide a group of members of the public and businesses as possible, the service will prioritise areas of highest risk.

1.2 - The Local Picture - Contribution to Council's' Strategic Priorities

Cambridgeshire County Council, Rutland County Council and Peterborough City Council have corporate strategic priorities. The shared service recognises the importance of upholding these priorities and how the day to day delivery of the food law enforcement service contributes to these. Table 1 in Appendix 1 provides examples of how the food and feed law enforcement service contributes to the council's' strategic priorities.

2.0 - Background

2.1 - Area Profile

Peterborough

Peterborough is a unitary authority in the East of England, with a population estimated in 2014 to be 193,740. The population of Peterborough increased by 8,140 persons (3.3%) between mid 2011 and mid 2014. This exceeds growth experienced in the East of England (2.7%) and England (2.3%) as a whole. Peterborough is the largest city in Cambridgeshire and the 27th largest in the United Kingdom, excluding urban zones. Peterborough has one of the most successful economies amongst unitary authorities in the East of England and is one of the fastest growing cities in the country.

Peterborough is a diverse multicultural city with over 9.2% of the population from the Indian subcontinent (census 2011). The city has seen a large increase in people coming from Eastern European countries and settling in Peterborough and as a result there is a large number of associated retail and catering premises.

Peterborough and Cambridgeshire authorities have formed a combined authority as a result of a devolution deal, led by Mayor James Palmer. This move has given Cambridgeshire and Peterborough direct control over what happens in this area. The initial focus of the combined authority has been on economic growth, transport, health, and housing.

Cambridgeshire

Cambridgeshire is one of the fastest growing areas in the UK, with an estimated population of

around 650,000. The county has five District Councils with the main centres of population being Cambridge, St Neots, Huntingdon, Wisbech, March St Ives, Whittlesey and Ely. Since a number of eastern European states acceded to the EC, there has been a significant increase in migrant population attracted to the local agricultural industry, particularly in the north of the county.

Much of Cambridgeshire is fen farmland, dedicated to the primary production of food, predominantly cereals and vegetables. There are also some livestock holdings, many of which are small and hobbyists. Although industry has not traditionally featured as a significant employer in Cambridgeshire, R&D and high tech industries have always been prevalent in the City, and are expanding rapidly, contributing significantly to the exponential growth of Cambridge City.

Rutland

Rutland became a unitary authority in 1997 and covers a total area of 39,398 hectares. This is mainly an area of mixed farms, with small farms predominating. Rutland is a sparsely populated rural county, with the two main market towns of Oakham and Uppingham, plus 50 villages making up the county with an overall population of 37,369 residents. The ethnicity of Rutland residents is made up as follows: 97% White, 1% Mixed/multiple ethnic group, 1% Asian/Asian British, 1% of Black/African/Caribbean/Black British and other ethnic groups.

Tourism makes a significant contribution to the local economy and together with the trend for eating out has resulted in a significant number of 'social eating' premises within Rutland and provides a major focus for the service's work. There are estimated to be about 50,000 visitors a year - of those visiting, most are day-trippers. Rutland remains the smallest region in the East Midlands.

2.2 - Organisational Structure

The organisational structure is complex due to the functions being delivered by two shared services. The first, a shared service between Rutland County Council and Peterborough City Council which saw Rutland County Council commission Peterborough City Council's Regulatory Service Teams to deliver both their food safety and food standards functions.

The second of the shared service arrangements culminated in the merger of Cambridgeshire County Council's Trading Standards Service and Peterborough City Council's Trading Standards Service, becoming 'Cambridgeshire and Peterborough Trading Standards'. This new service forms part of Peterborough City Council's Regulatory Service Team, yet continues to deliver Food and Feed Standards (and wider Trading Standards functions) across Rutland, Peterborough and Cambridgeshire. It is important to reiterate that the latter shared service does not cover Food Hygiene on behalf of Cambridgeshire. This is dealt with by District Council Environmental Health

Departments in Cambridgeshire.

Within Peterborough City Council, Regulatory Services is part of the Environment & Economy Directorate headed up by a Service Director who in turn reports to the Corporate Director for Growth & Regeneration. The Corporate Director reports to the Chief Executive.

3.0 – Food

3.1 - Scope of the Food Safety and Food Standards function across Peterborough, Cambridgeshire and Rutland

The range of regulatory duties undertaken is extensive, covering a multitude of trade, industry, safety and commercially related activities. Food law is enforced through planned inspections and sampling at risk assessed premises, self-assessment and through responding to, and where necessary investigating, complaints and enquiries received from any source. Food complaints and enquiries received by the Service are directed to enforcement officers for resolution in line with our enforcement policy.

Education and advice are an integral part of the inspection programme at business premises, with leaflets and written guidance frequently provided for future reference. Education campaigns are used to raise awareness of issues or new legislation affecting certain sectors

Food safety law is enforced by qualified Environmental Health and Regulatory Officers within Peterborough City Council's Food Safety Team and qualified Trading Standards Officers within Trading Standards. Food controls are managed by the responsible Subject Lead.

3.2 - Food Sampling

A food sampling programme is usually developed at the beginning of the year, including the sampling of locally produced, packed and imported products, and these feed into both regional and national sampling programmes.

Samples are taken in accordance with legal requirements, the food safety act code of practice, and any guidelines issued by the FSA or local government regulation.

The food safety element of the sampling programme is agreed annually with the Health Protection Agency and is coordinated in the region by the Eastern Region Food Sampling Co-ordinating Group and the Leicestershire Food Liaison Group. Sampling may also include testing surfaces and articles that come in contact with food. In relation to food safety, samples may be

taken to support local, regional or national campaigns. They will also be taken where an investigation or intelligence suggests there may be a problem and testing may provide information that will enable the officer to advise the business appropriately, or the sample may provide evidence which may inform formal or legal proceedings.

The food standards sampling programme is largely focused on regional and national sampling programmes and will normally be coordinated through the East of England Trading Standards Authorities group (EETSA) as well as local priorities. Food standards samples will, in normal circumstances, be submitted to the Public Analyst for analysis and comment.

The service also take samples under the private water regulations and conducts risk assessments and sampling at relevant premises as required.

3.3 - Demands on the Environmental Health Food Service in Peterborough and Rutland

Rutland is a small affluent rural county with predominantly English speaking businesses. Compared to Peterborough there are fewer poor performing businesses in Rutland and as a result less “other interventions” are carried out. Peterborough has a more diverse range of food businesses and a higher rate of lower performing food businesses. There are approximately 1700 businesses operating in Rutland with a majority employing less than 10 people. Small businesses are normal for Rutland. Peterborough sees a large number of food business registrations year on year which presents a challenge for officers to bring about sustainable improvements, ensure the database is current and up to date and that businesses are given an initial inspection to determine the risk rating and their food hygiene rating score.

Appendix 2 Table 2 details the risk rating profile of food businesses in Peterborough and Rutland. The risk rating determines an inspection frequency for businesses. Appendix 2 Table 3 details the food hygiene rating profile of all food businesses that are included in the scope of this scheme. The latter does not apply to Cambridgeshire as food hygiene is dealt with by the District Councils.

Food officers regularly conduct combined food safety and food standards inspections and alternative interventions. Appendix 2 Table 7 shows the breakdown of food standards premises by risk rating. Some premises, such as works canteens, school kitchens and residential accommodations will fall outside the programme for food composition and labelling inspections.

Appendix 2 Table 4 details the number of food premises that are subject to approval under EC Regulation 853/2004. Approval is required for all food establishments (business) that handle products of animal origin and then supply them to another establishment i.e. food business. Exemptions apply and not all food businesses that handle food/products of animal origin to other food businesses will require full approval.

3.4 Food Hygiene Rating Scheme

Both Peterborough City Council and Rutland County Council have implemented the food hygiene rating scheme (FHRS) in their areas. Note the districts of Cambridgeshire have also implemented the FHRS scheme but it is not covered by this plan.

The FHRS score is based on the findings from the inspection with the officer checking how well the business is complying with the law by looking at:

- How hygienically the food is handled , how it is prepared, cooked, re-heated, cooled and stored
- The condition of the structure of the buildings, the cleanliness, layout, lighting, ventilation and other facilities
- How the business is managed and maintains documentation to demonstrate processes and procedures to ensure that food is safe.

At the end of the inspection the business is given a rating from 0 to 5. The top rating of “5” means that the business was found to have very good hygiene standards during the inspection, whilst a score of “0” means that urgent improvement is necessary. The scheme has been designed to ensure that the ratings given to businesses are fair and it reflects the standards employed by the business at the time of the inspection. These ratings are available to the general public which can allow them to make an informed choice about where they buy and eat their food.

A business can be given one of these hygiene ratings:



In all instances premises may be targeted as a result of complaints received, local and national food audits, food alerts and advice from the FSA.

3.5 - Control and Investigation of Food Poisoning Outbreaks and Cases of Food Related Infectious Diseases

The service is a signatory to the memorandum of understanding with Public Health England (PHE) for the east of England, primary care trusts in Cambridgeshire and Peterborough and other local

authorities in Cambridgeshire for the investigation of food poisoning incidents and outbreaks of communicable disease. A standard operating procedure ensures investigations into reports of individual confirmed or suspected high risk food borne illness commence within two working days of notification. An incident outbreak plan, agreed by the Norfolk, Suffolk, Cambridgeshire and Peterborough Local Health Resilience Partnerships Cambridgeshire is implemented when circumstances require. For Rutland, an outbreak control plan is agreed by the Leicestershire and Rutland food liaison group and PHE. A similar plan involving Anglian Water is in operation for incidents where the main water supply may be contaminated or a risk to health.

Appendix 2 Table 5 shows the number of official notifications of food poisonings received between April 2015 and March 2019. Information and guidance leaflets on how to avoid food poisoning illnesses are available to the public and regularly updated.

In cases where the service receives reports of chemical contamination of food and there is a subsequent threat to human health, food safety and trading standards staff liaise to determine responsibility or undertake a joint investigation as the situation demands.

3.6 - Food Complaints

Complaints are received relating to fitness, contamination, objects in food, composition and labelling and hygiene standards of food premises or food handlers. All complaints are reviewed and enforcement action taken where appropriate having regard to the enforcement policy, operating procedures, statutory codes and government guidance.

Appendix 2 Table 6 details the number of service requests that are received and dealt with each year.

3.7 - Food Safety Incidents

The FSA regularly issues food alerts to local authorities either for information or for action. The alerts relate to food products on the market which may be unsafe. In responding to food alerts the service follows the guidance in the code. The majority of food alerts are issued for information only, however they are occasionally marked as requiring immediate action, which the service treat as a priority.

3.8- Interventions

The inspection process adopted for food safety and food standards follows that laid down in the code of practice issued under Section 40 of the Food Safety Act 1990, Regulation 26 of the Food Safety and Hygiene (England) Regulations 2013. Officers undertaking food law enforcement also meet the qualifications and experience requirements stipulated in the code. Revisits following a

programmed inspection are carried out as necessary to ensure compliance with legislation.

In accordance with the code of practice, there are a number of methods that may be used to judge compliance and ensure that legislation is being complied with. These are known as “interventions”. Interventions are key to improving compliance with food law. It is important to note that risk rating schemes remain in place and in conjunction with ‘intelligence’ inform service delivery. The intervention programme is designed to target resources towards the highest risk premises, these presenting the greatest risk to members of the public.

The interventions, or official controls, include the following:

- inspections
- monitoring
- surveillance
- verification
- audit and
- sampling where the analysis/examination is carried out by an official laboratory.

Other interventions that are not official controls include:

- advice
- coaching
- education/training
- information and intelligence gathering

High risk food premises will continue to receive programmed inspections or audits. Lower risk premises may receive an alternative intervention. For example, a self-assessment questionnaire for low risk businesses will be used as appropriate. This will increase contact and guidance provided to businesses as well as enabling resources to be better targeted at higher risk premises.

4.0 Feed

4.1 Feed premises profiles

All feed businesses must be either registered or approved by the local authority to manufacture, store, transport and use animal feed. The local authority must keep a register of these premises.

A breakdown of feed premises by type and risk assessment for Cambridgeshire, Peterborough and Rutland can be found in Appendix 2 table 8.

Some business will fall outside the scope of registration, such as those who keep livestock as pets, which will not enter the food chain. It is also known that there are some feed businesses that are not registered.

4.2 Feed Sampling

Each authority will consider procuring samples each year. This will be in line with the national priorities as set out by the Food Standards Agency. Other samples will be taken at feed manufacturers based on officer initiative, risk and intelligence.

4.3 Funded Inspection numbers

Appendix 4 Table 15 gives the number and registration category of those businesses to be inspected this year.

4.4 Feed Complaints

All feed complaints will be risk assessed and action will be taken as and when we deem it appropriate. Complaint numbers have historically been low but there is a service demand from new businesses registering.

4.5 Interventions at feed business operators

All feed business operators are risk assessed using the risk assessment published in the Feed Code of Practice. A risk assessment of each premises is carried out at the time of inspection. Interventions at feed businesses are carried out based on risk. All interventions are carried out and delivered in line with the National Trading Standards/FSA funded work. These inspections are set at the beginning of the financial year are prioritised in accordance with national priorities. All interventions are delivered by the Trading Standards team within their levels of competency.

5 – Enforcement Policy

Peterborough City Council, Cambridgeshire County Council and Rutland County Council have a documented Compliance and Enforcement Policy which is published on the respective Councils' websites. The policy is consistent with the Regulators' Code and Legislative and Regulatory Reform Act 2006. The Councils also comply with all legislation applicable to enforcement action and advice issued by central Government from the Food Standards Agency.

6 – Public Analyst

Cambridgeshire and Peterborough Trading Standards has appointed Public Analyst Scientific Services Limited as Public Analyst and Agricultural Analyst. This is a statutory appointment. It has appointed Hampshire Scientific Service to act as the Deputy Agricultural Analyst.

7 - Advice to Businesses

The respective teams work with businesses to help them comply with the law and to encourage the use of best practice. The range of activities can include:

- Providing advice during the course of inspections and other visits.
- Running seminars.
- Promotion of the FSA safer food better business pack to encourage sustainable improvements in food safety.
- The provision of advice leaflets and information via the council's website.
- Responding to queries.
- Dialogue with trade associations or business partnerships.

8 - Primary Authority Scheme

Peterborough City Council is one of the leading providers of Primary Authority advice nationally, with over 90 business signed up to their legally assured advice service. Clients range from some of the largest retailers in the UK to sole traders operating from their homes. If we feel that a business would benefit from such an ongoing advice arrangement, or even ad-hoc pay-as-you go advice, we provide them with details of the options and will refer them to our business advice team.

9 - Liaison with other Organisations

The service liaises with a wide range of organisations in carrying out its food and feed law enforcement function. These include:

- Local food liaison groups. These groups share best practice, promote consistency, and benchmark both Trading Standards and Environmental Health Services.
- The Eastern Region Food Sampling Co-ordinating Group.
- The Norfolk, Suffolk, Cambridgeshire and Peterborough local health resilience partnerships.
- Government departments including Regulatory Delivery Office, Food Standards Agency, Veterinary Medicines Directorate and Department of Environment, Food and Rural Affairs.
- The Health Protection Agency's Laboratory Service both locally and regionally.

- East of England Trading Standards Authorities Group (EETSA). This group coordinates food standards sampling activities within the eastern region. Trading Standards also plays an active part in the EETSA Agriculture Group which meets quarterly to discuss current issues, including but not limited to, inspection regime, non-compliances, best practice and new legislation.
- The public and agricultural analyst regarding sampling and analysis.
- Other local authorities as a consequence of primary authority responsibilities.
- The Health Protection Committee for Peterborough and Cambridgeshire.
- Officers are actively encouraged to use the Knowledge Hub to seek views from other Authorities, input into expert debate and keep up to date with legislative and interpretative developments.
- Additionally they liaise with other regulators to arrange joint visits as appropriate to reduce the burden on local businesses

Specific specialist services are provided externally by the following service providers:

- The Public Analyst is Campden BRI based at Chipping Campden. As the Public Analyst they undertake analysis of extraneous matter that has been the subject of food complaints and can provide advice on identification of complaint matter.
- The Health Protection Agency examines food at accredited laboratories for bacterial and viral contamination.
- The relevant Consultants in Communicable Disease Control, employed by the Health Protection Agency, have been appointed as Proper Officers for each Council under The Public Health (Control of Disease) Act 1984 with regard to food poisoning and infectious disease.

10 - Promotional Work and Communications

The service will continue to promote key messages by utilising the communications team to send out informative information, warnings, highlight prosecutions, provide educational press releases regarding current and/or emerging issues, and new legislation. This will include the use of social media platforms.

11 - Resources

11.1 Peterborough City Council Food Safety Team (Environmental Health)

In 2018 following a successful capacity bid two additional posts were added to the team structure. After a recruitment process for these additional posts and to fill internal vacancies a

total of 2.3 FTE officers joined the team by October 2018.

The full time Regulatory Assistant qualified as an authorised food officer in December 2018.

As of October 2018 there are 11 food officers, made up of 1.0 FTE PEHO; 2.5FTE EHO; and 4.8FTE RO's and 1 Regulatory Assistant (from December this was 5.8 FTE RO's).

Due to the demands upon the service It is calculated that each FT EHO spends 0.8 FTE on the delivery of the Food Service and each FT Regulatory Officer spends 0.9FTE (this is pro rata for part time RO's. One member of staff was absent for a total of 26 weeks.

The following table shows the actual resource available in Peterborough during 2018 - 2019 was 6.05 FTE.

Table - Actual Resource Available in Peterborough for 2018 - 2019

Designation	Full time Equivalent	Adjustment to allow for Demand upon the service (as above)	Actual available resource for intervention program
1 x Full time PEHO 1 x Full Time EHO (LB) 0.5 x Part Time EHO (HM)	1.0 FTE 1.0 FTE 0.5 FTE	0.7 FTE 0.2 FTE 0.1 FTE	0.3 FTE 0.8 FTE 0.4 FTE
3 x Full time RO's (NR, JC, SOB) 1 x Full Time RO (GF),	3.0 FTE 0.5 FTE*	0.3 FTE 0.1 FTE	2.7 FTE 0.4 FTE
0.6 x Part Time RO (AB) 0.4 x Part Time RO (HP) 0.6 x Part Time RO (DT) 0.2 x Part Time RO (DW)	0.6 FTE 0.4 FTE 0.6 FTE 0.2 FTE	0.1 FTE 0.1 FTE 0.1 FTE 0.05 FTE	0.5 FTE 0.3.FTE 0.5 FTE 0.15 FTE
No of Competent Authorised Food Officers = 11	7.3 FTE	1.75 FTE	Total = 6.05 FTE

*Officer on intermittent long term sick and available for 50% of FT contracted hours.

From July 2018 onwards a Duty Officer system was introduced requiring all team members to be a Duty Officer and deal with general day to day complaints and enquiries. Each Officer has on average 2 days a month as Duty Officer - this time has been considered within the demands upon the service for both Peterborough and Rutland.

11.2 Rutland County Council Food Safety Team (Environmental Health)

In April 2018 the EHO based in Rutland (0.6FTE) left the Council. The existing 0.6 FTE RO remained

in Rutland whilst resources from Peterborough were deployed to Rutland to cover this vacancy (0.4FTE RO). Following recruitment a Regulatory Assistant (0.8FTE) was employed in the Food Team, based in Rutland, whilst they completed their professional and practical assessments. This was completed successfully in September 2018 and the RA became an authorised RO.

The Senior RO for Health and Safety now leads on all Health and Safety reactive and proactive work in both Peterborough and Rutland. This has released those Food Officers to focus on the demands and delivery of the Food Safety Service. The team is now working in a more fluid manner so if Officers based in Rutland require it they can call upon those Officers based in Peterborough for this help or assistance.

The following table shows the actual resource available in Rutland during 2018 - 2019 was 1.4FTE.

Table - Actual Resource Available in Rutland for 2018 - 2019

Designation	Full time Equivalent	Adjustment to allow for Demand upon the service	Actual available resource for intervention program
1 x Full time PEHO 1 x Full Time EHO (LB)	1.0 FTE 1.0 FTE	0.7 FTE 0.2 FTE	0.1 FTE 0.1 FTE
0.6 x Part Time RO (HP) 0.4 x Part Time RO (DT) 0.8 x Part Time RO (DW)	0.6 FTE 0.4 FTE 0.8 FTE	0.1 FTE 0.1 FTE 0.2 FTE	0.5.FTE 0.3 FTE 0.6 FTE
No of Competent Authorised Food Officers = 5	3.8 FTE	1.3 FTE	Total = 1.4 FTE

The team continue to address other functions which can impact on their ability to complete food work including infectious diseases, food complaint investigations. Private Water Supplies are now dealt with by an EHO based in Peterborough.

11.3 Cambridgeshire and Peterborough Trading Standards Team (Food Standards & Feed)

In terms of Food Standards, 1.5FTE is dedicated to this function within Cambridgeshire and 0.6FTE is dedicated to delivering this function in Peterborough. In terms of Feed, 0.5 FTE is dedicated to Feed inspections and enforcement and 0.1FTE dedicated to the administrative side of this role.

12 – Performance

Records of interventions carried out by officers are maintained. In addition to planned inspections officers frequently have to respond to emerging issues and threats, these reducing the number of inspections that can be completed. With dual enforcement responsibility, officers also have to respond to health and safety matters.

Appendix 3 details Food Safety performance achieved between April 2015/16 and March 2019 across Peterborough (Table 9) and Rutland (Table 11), and Appendix 4 details Food Standards performance across Cambridgeshire (Table 13). Using this performance as a baseline, projected performance has been made in relation to Food Safety for the forthcoming year for Peterborough (see Table 10) and Rutland (Table 12). Depending on the outcome and timing of the FSA regulatory landscape review, it may be necessary to increase the staffing resources to meet the rising service demand. Any capacity bids will follow the corporate approval and procurement process.

13 - Staff Development Plan

Staff development is carried out in accordance with the investors in people standard for which the council is accredited, and has been awarded the silver standard. All staff participate in the performance and development review scheme (PDR) which includes annual appraisals. Individual officer's training needs are identified as part of this process and through regular one to ones.

13.1 - Food Hygiene and Food Standards

It is a statutory requirement that officers enforcing food law receive a minimum of 20 hours of continuous professional development (CPD) training each year. These 20 hours can be split into:

- A minimum of 10 CPD hours on core food matters directly related to the delivery of official controls;
- 10 hours on other professional matters. This could include training needs identified by the Lead Food Officer during competency assessments/appraisals.

To meet this requirement the service uses a range of training and development activities including:

- Formal training courses
- Regular updates through team meetings, seminars and training days
- Peer review
- In house training
- Cascade training
- E learning

13.2 - Feed

All feed qualified officers who are actively engaged in feed inspections, will receive training to ensure they are competent in the area of work. This training will involve shadowing other feed officers/lead officers, (either within the authority or within the region) and attendance at feed training, through FSA or regional courses. All qualified officers will remain competent by completing at least 10 hours of appropriate CPD each year.

14 - Quality Assessment

14.1 - Quality assessment and internal monitoring

The Service's food law enforcement is subject to regular monitoring by management in accordance with the quality monitoring standard operating procedure. This helps to ensure standards are maintained. Targets and workloads are reviewed through monthly 1-1's. Quarterly quality checks on records are carried out by management and all officers food hygiene officers are required to participate in an annual accompanied inspection. Reviews of service provision are undertaken and team meetings allow for general feedback from the subject lead.

14.2 - Service Database

The service operates a database for the storage of data and production of performance management information and statutory returns, including that made to the local authority enforcement management system (LAEMS). In order to minimise the risk of corruption and loss of data, databases are backed up.

15.0 - Review

15.1 - Review against the Service Plan including variations

The Service Plan is reviewed six monthly and additionally when service needs and priorities change. An annual review will take place at the end of the period covered by the Service Plan by the manager and team.

Monitoring against performance targets takes place on a regular basis, and enforcement policies and procedures will be reviewed on an annual basis.

In order to demonstrate consistency Appendix 6 Table 16 shows performance against last years' service plans.

15.2 - Service development and areas for improvement

The service is reactive and on a daily basis responds to complaints, requests for advice, food alerts and infectious disease notifications. However, the teams are also very much aware of the need to plan and build in improvements and developments to ensure their services remain fit for purpose. Many of these areas for improvement are drawn out in the Service Planning process, with ongoing opportunities for improvement suggestions throughout the year. Appendix 7 Table 14 lists the agreed actions for the food and feed law enforcement service for 2019-20.

16 - Conflicts of interest

The authority is aware that Primary Authority and Home Authority links can lead to conflicts of interest when a situation requiring an intervention arises. Where such a risk is identified it will be the responsibility of the Officer(s) involved to bring this to the attention of their line manager so that appropriate actions can be put in place to avoid this.

17 – Accessibility

Accessibility	
Method of Access	Level of Availability
Telephone	Consumers through Citizens Advice Consumer Service (CitA). 08.00 - 18.30 Monday to Friday 09.00 - 13.00 Saturday Officers are available on direct lines and are issued with mobile phones.
Answer phone	Out of hours calls are recorded on the CitA and within each authority hour of hours contact systems. Voice mail operates on direct lines.
E-mail	trading_standards@cambridgeshire.gov.uk for Cambridgeshire. tstand@peterborough.gov.uk for Peterborough and Rutland.
Web site	The authority's website has consumer, business and general information together with links to other sites accessed via www.cambridgeshire.gov.uk or www.peterborough.gov.uk .
By post	Mail received at the services offices is forwarded to the appropriate officer.
Emergencies	The Service does not operate an emergency service, but each subscribes to their County Council out of hours contact system.
Methods of Access for those with Special Needs	
Client Group	Access Arrangements
Wheelchair Access	All offices are wheelchair accessible.
First language not English	Language Line is used by the CitA. – and the Service will make appropriate translation arrangements should this be necessary
Hearing Impaired	Hearing loop and minicom facilities are available.

Appendices

Appendix 1 - Corporate strategic priorities

Table 1 - Contributions to the council's corporate strategic priorities by the food and feed law enforcement service

Peterborough City Council Strategic Priorities 2017	Rutland County Council Strategic Aims 2017	Cambridgeshire County Council Strategic Priorities 2017	Examples of contribution to Strategic Priorities
Achieve the best health and well-being for the city (2016)	Promoting Good Health and Wellbeing Improving Access to Services	Helping people live healthy and independent lives. Supporting and protecting vulnerable people	Educate businesses regarding food and feed and inform consumers. Uphold feed standards to ensure meat going into the food chain is safe to eat Inspect food businesses on a risk basis but focus where necessary on areas where people may be more vulnerable.
Keep all our communities safe, cohesive and healthy.(2016)	Creating a safer community	Helping people live healthy and independent lives	Improve the health of residents and people that live and work in or visit Peterborough and Rutland through regulating food/feed businesses to ensure the safe production, storage and sale of food
Implement the Environment Capital Agenda (2016)	Protecting our rural environment		Ensure as a service we are environmentally responsible and set an example of good practice to our colleagues and customers. Explore better ways to deliver the service, increasing use of mobile working practices and technology, and social media.
Drive growth, regeneration and economic development. (2016)	Maintaining high levels of employment and a thriving local economy	Developing the local economy for the benefit of all	Support businesses through the provision of advice, information and risk based inspection and intervention programs. Support businesses by signposting to other services and agencies where advantageous.

Appendix 2 - Demands on the food service

Table 2 - Food hygiene premises profile 2018/19

The following table demonstrates the risk rating profile of food premises in Peterborough and Rutland.

Inspection category	Total number of premises					
	2017		2018		2019	
	PCC	RCC	PCC	RCC	PCC	RCC
A (every 6 months)	2	3	2	0	3	2
B (every 12 months)	27	7	26	6	34	8
C (every 18 months)	261	54	264	63	253	74
D (every 24 months)	654	189	642	167	660	184
E (every 36 months)	870	176	852	156	771	159
Unrated	127	19	146	74	115	22
Totals	1941	448	1932	466	1835	449

Source LAEMS Return

* Cambridgeshire premises are not listed as food hygiene is regulated by District Council Environmental Health Departments in Cambridgeshire

Table 3 - FHRS Rating profile of Food Premises

FHRS Rating	Total number of premises					
	2016 - 2017		2017 - 2018		2018 - 2019	
	PCC	RCC	PCC	RCC	PCC	RCC
5	1022	257	1060	270	1047	286
4	267	86	240	60	223	56
3	58	5	59	6	62	10
2	62	2	42	2	34	0
1	31	3	27	5	27	6
0	4	1	0	0	2	0
Totals	1444	404	1390	343	1395	358

Some registered food businesses are exempt from the food hygiene rating scheme i.e. manufacturers, businesses that don't supply direct to the final consumer, or businesses that only handle very low risk food e.g. fruit and veg, confectionary. New registered businesses are unrated and not included in the above list.

Table 3a - Broadly Compliant Premises

Premises Rating	Total number of premises					
	2016 - 2017		2017 - 2018		2018 - 2019	
	PCC	RCC	PCC	RCC	PCC	RCC
A	0	0	0	0	0	0
B	10	5	9	4	18	4
C	214	48	223	57	225	66
D	620	187	616	164	635	181
E	861	176	843	156	762	159
Total	1705	419	1691	381	1640	410
% Broadly Compliant	87.8%	79.9%	87.5%	81.7%	89.3%	91.3%

Table 4 - Number of food businesses and number of approved premises

	Total number of premises Peterborough 2019	Total number of premises Rutland 2019
Total no of Food businesses (not including unrated premises)	1932	450
No of premises approved under EC Regulation 853/2004 relating to Product Specific establishments		
(i) meat products	2	5
(ii) egg packer	1	2
(iii) cold stores	5	0

Table 5 - Number of official notifications of food poisonings and food related infections received year on year

Year	Total number of notifications for Peterborough	Total number of notifications for Rutland
April 2014 - March 2015	231	31
April 2015 - March 2016	203	25
April 2016 - March 2017	103	31
April 2017 - March 2018	364	40
April 2018 - March 2019	243	41
April 2019 - March 2020		

* Cambridgeshire data is not listed as poisoning and infections fall within the jurisdiction of District Council Environmental Health Departments in Cambridgeshire

Table 6 - Food Safety service requests received

Year	Peterborough 2016	Rutland 2016
April 2014 - March 2015	499	88
April 2015 - March 2016	518	73
April 2016 - March 2017	546	183
April 2017 - March 2018	555	152
April 2018 - March 2019	438	178
April 2019 - March 2020		

Service requests are recorded interactions with members of the public or businesses. These service requests often require action from an officer, they can include:

- General food enquiry
- Request for advice
- Complaints about an unhygienic food premises*
- Complaint about unhygienic practices at a food business*
- Suspected food poisoning (not via the official notification route)*
- Food complaints
- Food labelling concerns

* Denotes that these complaints are not included in Cambridgeshire data due to the fact such complaints are dealt with by District Council Environmental Health Departments in Cambridgeshire

Table 7 - Food Standards Premises Profile 2018/19

Food Standards Risk Rating	Total number of Premises in 2018-2019		
	Peterborough	Rutland	Cambridgeshire
High Risk	3	0	9
Medium Risk	288	123	1047
Low Risk	1284	158	1572
Total Number of Premises*	1575	281	2628

*This number does not include unrated premises which have not been visited and may not be trading.

Table 8 - Feed premises profiles

Feed business premises profile	Cambridgeshire	Peterborough	Rutland
Manufacturers (A02/05/06 R02/03/04/06)	9	1	2
Co-products R12	37	8	2
Mobile Mixers R04	0	1	1
Importers	6	0	0
Stores R9	16	2	3
Distributors (A02/03/07/11, R01/03/05)	29	3	2
Transporters R8	58	5	5
On Farm Mixers, R10 & R11	43	2	4
Pet food manufacturer R06	5	2	1
Supplier of surplus food R07	73	24	3
Livestock farm R13	862	59	144
Arable Farm R14	645	84	89
Total	1783	191	256

Appendix 3 – Food Safety Performance

Table 9 - Peterborough Food Safety Performance 2015 - 2019

Year	April 2015 - March 2016	April 2016 - March 2017	April 2017 - March 2018	April 2018 - March 2019	April 2019 - March 2020
Total Completed Interventions (a)	1118	890	819	1092	
No of Due Interventions completed (b)	670	544	525	949	
Available Resource (FTE) (c)	5.5	5.5	3.23	6.05	
Due interventions achieved per officer/per month (d)	$670 / 12 = 55.83 / 5.5 = 10.1$	$544 / 12 = 45.33 / 5.5 = 8.24$	$525 / 12 = 43.75 / 3.23 = 13.54$	$949 / 12 = 79.08 / 6.05 = 15.04$	

Table 10 – Peterborough’s Food Safety Team projected performance for the next financial year based on current year's performance

Year	April 16 - March 17	April 17 - March 18	April 18 - March 19	April 19 - March 20	April 20 - March 21
No of Outstanding Due Interventions (a)	593	764	931	433	
No of Due interventions (b)	637	688	525	477	
Total due Interventions for year (a + b = c)	1230	1452	1456	910	
No of completed due intervention from previous year (d)	670	544	819	949	
Projected No of Outstanding Due interventions by the end of the year (c-d)	560	908	637	34	

Cases and projects that have impacted on the team’s performance in 2018- 2019

- Two additional members of staff and filling of existing vacancies resulting in a fully staffed team by October 2018
- 1 member of staff on intermittent long and short term sick for 50% of year
- Introduction of agile working
- Implementation of more efficient working methods - duty officer, dedicated senior H&S RO dealing with majority of H&S issues.

The team are currently in the process of addressing the significant no of overdue interventions which is 433 at 1st April 2019. Of this figure there were 97 Unrated premise that are overdue an inspection. The Team are prioritising these overdue interventions to bring them back into the intervention programme by the end of the 2nd quarter.

Table 11 – Rutland Food Safety Performance 2015 - 2019

Year	April 2015 - March 2016	April 2016 - March 2017	April 2017 - March 2018	April 2018 - March 2019	April 2019 - March 2020
Total Completed Interventions (a)	368	255	288	249	
No of Due Interventions completed (b)	174	122	178	146	
Available Resource (FTE) (c)	0.8	0.8	0.85	1.4	
Due interventions achieved per officer/per month (d)	$174 / 12 = 14.5$ $14.5 / 0.8 = 18.1$	$122 / 12 = 10.2$ $10.2 / 0.8 = 12.75$	$178 / 12 = 14.83$ $14.83 / 0.85 = 17.44$	$146 / 12 = 12.2$ $12.2 / 1.4 = 8.7$	

Table 12 – Rutland’s projected performance for the next financial year based on current year's performance

Year	April 15 - March 16	April 16 - March 17	April 17 - March 18	April 18 - March 19	April 19 - March 20
No of Outstanding due interventions (a)	39	77	189	57	
No of due interventions (b)	183	218	118	146	
Total due interventions for year (a + b = c)	222	295	307	203	
No of completed due intervention from previous year (d)	174	122	288	249	
Projected No of outstanding due interventions by the end of the year (c-d)	48	173	19	0	

Cases and projects that have impacted on the team’s performance in 2018 - 2019:

- Addition of a Regulatory Assistant later becoming a Regulatory Officer having successfully completing her professional assessments.
- Introduction and implementation of more efficient working methods i.e. duty officer, dedicated senior H&S RO dealing with majority of H&S issues and more fluid team arrangements across both services.
- Introduction of agile working

Appendix 4 – Food Standards Performance

Table 13 - Food standards performance across Cambridgeshire, Peterborough and Rutland

Year	Area	April 16 - March 17	April 17 - March 18	April 18 - March 19
No of programmed high risk inspections completed	Cambs	23	22	18
	P'boro	2	6	1
	Rutland	1	1	0
No of complaints/ referrals received	Cambs	134	103	105
	P'boro.	8	17	8
	Rutland	1	2	3
No of samples taken	Cambs	107	73	54
	P'boro.	10	5	5
	Rutland	1	0	6

Inspections

Liaison with the environmental health department, specifically Peterborough, allow them to monitor food standards whilst inspecting for food safety, feeding back to Trading Standards on any issues found.

Complaint numbers

Complaint numbers, received through the Citizens Advice Consumer Service, have been falling nationally over the last few years. Often media reports can lead to an increase in complaints and often food can be part of a larger complaint, for example about a hotel stay, in which case it may be recorded as a fair trading rather than a food complaint.

Samples

The Food Standards Agency has previously provided local authorities with funding to take food samples on areas of interest, or for market surveillance. This ended in 2016 and as a result the number of food samples taken nationally has reduced significantly. The formal analysis of food can be a significant cost therefore with tighter budgets this area of spending is being more tightly controlled. Regional projects sometimes replace FSA funding but very little additional money is available.

Appendix 5 – Feed Performance

Table 14 - Feed Safety performance across Cambridgeshire, Peterborough and Rutland

Year	April 17 - March 18	April 18 - March 19	April 19 - March 20
No of funded inspections programmed to take place	110	56	75
% of funded programmed inspections carried out	100%	100%	█
No of new feed businesses registered	71	45	█
% of complaint/intelligence led inspections	100%	100%	█
No. of samples taken	9	3	█

Table 15 - Funded Feed Inspections completed 2018/19 by category and authority

Feed Business Inspection plan	Cambridgeshire	Peterborough	Rutland
Manufacturers (A02/05/06 R02/03/04/06)	3	0	1
Co-products R12	8	1	1
Mobile Mixers R04	0	0	1
Importers	0	0	0
Stores R9	2	1	0
Distributors (A02/03/07/11, R01/03/05)	0	1	0
Transporters R8	6	0	1
On Farm Mixers, R10 & R11	5	0	0
Pet food manufacturer R06	2	0	1
Supplier of surplus food R07	3	4	0
Livestock farm R13	7	0	0
Arable Farm R14	3	0	0
Total	44	7	5

Appendix 6 – Performance against Service Plan across Food and Feed

Table 16 - Completed actions from respective team Service Plans 2017 - 2019

	Action	Outcome	Timescale	Owner	Date For Completion
Food Safety – Environmental Health					
1.	Implement a training and support programme for staff	Ensure qualified staff can maintain their competence through CPD and shared good practice. Ensure officers undertaking environmental health degree and other qualifications are fully supported.	April 2016 – March 2020	All	On-going
2.	Implement a system to comply with the competency requirement in the Code of Practice	Promote consistency and competency among officers	March 2017	LA	On going
3.	Participate in utilising new technologies to increase flexible working and reduce accommodation needs	Trial and implement new hardware and software. Google software applications, new telephone arrangements	April 2018	LA	Completed April 2018
4.	Participate in the planning of the council's relocation Fletton Quays	Identify service accommodation needs and with reduced capacity	Summer 2018	LA	Completed August 2018
5.	Expand Primary Authority partnerships with existing partners to incorporate Food Hygiene.	Explore, develop and implement PA partnerships to offer our services to assist their business at a competitive cost.	March 18 - March 19	LA/All	Completed - a further 3 PA partnerships were agreed in Food and/or Food Safety in 2018-2019

6.	Develop and Implement Food Hygiene Training and deliver training sessions to businesses	Develop a generic Food Safety training course and a "What a Food Inspector Looks For" as a practical training course. Provide training in collaboration with TS & Licensing	March 2019	LA/HP	Completed - 3 Food Safety training sessions were delivered in 2018-2019
7.	Improve the resilience of the delivery of the Food Service for Rutland County Council	Ensure all Peterborough based Officers can access RCC IT and facilities to react to any emerging issues.	March 2019	LA	March 2019
8.	Complete all recommendations and actions highlighted in the FSA Audit from June 2017.	Take necessary action to address and complete Recommendations 1, 3 and 4 from the FSA Audit.	March 2019	LA	Completed March 2019
Food Standards – Trading Standards					
9.	Statutory high risk food standards inspections to be carried out to check compliance with food legislation eg. description, composition, labelling, origin labelling.	High risk inspection programme completed. Non-compliant businesses brought into compliance and Return completed.	March 2018	LR/SB	End of financial year
10.	Medium risk food standards inspections targeted to achieve the maximum benefit using the available resources. Intelligence, initiative and complaint led sampling only following the removal of FSA funding.	Medium risk inspection programme completed. Non-compliant businesses brought into compliance.	March 2018	LR/SB	End of financial year
Feed - Trading Standards					
11	Statutory feed inspections funded by FSA to check the	Inspection programme completed. Non-compliant businesses	March 2018	HS/SB	End of financial year

	production, storage, labelling, hygiene, transportation etc of feed in order to protect the health and wellbeing of animals and ultimately the public.	brought into compliance and Return completed.			
12.	Risk score all new feed premises (statutory) and inspect only those considered higher risk as appropriate to check their legal compliance for the reasons stated above.	Risking and inspections completed.	March 2018	HS/SB	End of financial year

Appendix 7 - Service Plan 2019-20

Table 14 - Actions from across respective team's Service Plans 2019-20

	Action	Outcome	Timescale	Owner	Date For Completion
Food Safety – Environmental Health					
1.	Address the deficit in the Food Hygiene inspection Plan and bring inspection frequencies in line with the Food Law Code of Practice for both Peterborough & Rutland	Ensure officers are adhering to the Food Law CoP and prioritising inspections according to their risk. inspecting and working efficiently and appropriately assist in reducing the deficit.	March 2020	LA/ALL	
2.	Collaborative working with Public Health to address Obesity in Peterborough	Continue with the Healthy Options scheme and look to extend it to include Nutritional training. Participate in the Childhood Obesity Trailblazer programme	March 2020	LA/HP	
3.	Address the overdue interventions	Bring all overdue interventions back into	October	LA	

	(Recommendation 2) as highlighted in the FSA Audit in June 2017.	the intervention programme on a priority basis (high risk first) and address areas of concern as listed in the action plan	2019		
Food Standards – Trading Standards					
4.	Statutory high risk food standards inspections to be carried out to check compliance with food legislation eg. description, composition, labelling, origin labelling.	Inspection/sampling/education programme completed within required timeframes Any compliance issues addressed to ensure all businesses visited are brought into compliance Any appropriate cases investigated in line with our enforcement policy and legal action taken as appropriate All reports on findings completed and returned to the FSA, EETSA etc. within the required timeframes	March 2020	LR/SB	End of financial year
5.	Medium risk food standards inspections targeted to achieve the maximum benefit using the available resources. Intelligence, initiative and complaint led sampling only following the removal of FSA funding.	As above	March 2020	LR/SB	End of financial year
6.	Continue 2018-19 allergens project, sampling food from takeaways and cafés	Advice/training offered to businesses. Follow up sampling with the potential for formal	March 2020	LR/SB	By end of financial year

	to check for allergen description compliance. Providing training to businesses with the support of EH will be explored	action.			
Feed - Trading Standards					
7.	Statutory feed inspections funded by FSA to check the production, storage, labelling, hygiene, transportation etc of feed in order to protect the health and wellbeing of animals and ultimately the public.	As above	March 2020	HS/SB	End of financial year
8	Risk score all new feed premises (statutory) and inspect only those considered higher risk as appropriate to check their legal compliance for the reasons stated above.	Risking and appropriate inspections completed	March 2020	HS/SB	End of financial year