**Document Control Information**

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Title:

Public Protection Partnership

**OFFICIAL FEED AND FOOD STANDARDS CONTROLS SERVICE PLAN 2024- 2025**

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It is a requirement that Local Authorities produce a Feed and Food Service Plan each year, the format of which is specified in the Framework Agreement on Official Feed and Food Control by Local Authorities.

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**1.0 Aims and Objectives**

**1.1 Aims and Objectives**

The annual Feed and Food Law Enforcement Plan “the plan”, in relation to Trading Standards, is designed to deliver on the Public Protection Partnership’s (PPP) aims and priorities in respect of promoting and protecting health and supporting reputable businesses.

This plan covers the local authority areas of Bracknell Forest, West Berkshire, and Wokingham, and in accordance with the framework agreement on official feed and food law control service planning as set out by the Food Standards Agency (FSA). Specifically, it sets out how these authorities regulate and protect the food chain from ‘farm to fork’ in respect of feed quality, food and feed hygiene at primary production, food standards and labelling requirements. The food hygiene aspects are covered in a separate plan.

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

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

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

**Key Objectives**

* To align the food program with the New Food Standards Delivery Model (anticipated adoption is Q2/Q3). This is attached at Appendix 2.
* To ensure the PPP carries out planned inspections within higher risk feed and food businesses. This includes the provision of legal and practical advice at the time of the visit to improve compliance rates.
* To apply alternative interventions and approved strategies where lower risk premises are concerned, that are in line with relevant approved Codes of Practice (CoPs). E.g. Earned recognition, alternative enforcement strategy.
* Assess unrated and new premises to bring them into the risk-based audit program in line with codes of practice.
* By analysing intelligence and information entering the service, identifying where current quality standards are not being met.
* To respond to customer complaints and requests for our service as well as requests for advice from businesses.
* In line with national priorities to ensure, primary producers and feed business operators achieve compliance with the relevant feed and food hygiene requirements.
* To provide information to consumers to enable them to make informed choices.

**1.2 Local Priorities**

The relevant Public Protection Partnership overarching priorities are:

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

There are 5 relevant local (Service) specific priorities outcomes from 9. These are:

1. Protecting Consumers from Fraud
2. Reducing Harm in Young People
3. Protecting and Informing Consumers
4. Promoting Animal Welfare
5. Safer Food Chain

**2.0 Background**

**2.1 Profile & Organisational Structure**

On 6th January 2017 Bracknell Forest Borough Council (BFBC), West Berkshire District Council (WBDC) and Wokingham Borough Council (WBC) entered a joint service, inter authority agreement (IAA) for Trading Standards, Environmental Health, and Licensing. This function is provided by the Public Protection Partnership (PPP).

The food and feed functions fall under the remit of the Service Lead: Public Protection.

Wokingham Borough Council withdrew from this partnership on the 31st March 2022, and at the same time entered into a further agreement whereby the Trading Standards function continued to be delivered by the PPP for Wokingham BC.

PPP governance arrangements have led to PPP being directed by a separate committee of elected members representing the two remaining partner authorities who are advised by a joint management board (JMB) made up of heads of service representing each authority. The Wokingham contract is managed through the Joint Management Board.

The service serves a rising population of almost ½ million residents, comprising of around 120,000 (BFBC), 160,000 (WBDC) and 165,000 (WBC). Whilst the three authorities share many similarities such as the types of businesses, their more modern industrial and historic towns and villages, and health demography, each area is also unique. For example, major retail, shopping, and leisure facilities within the Lexicon can be found within BFBC. Within West Berkshire, rural landscapes, farming, and horse racing are commonplace. Wokingham has a normal distribution of food businesses as far as Food Standards are concerned, and like BFC, a relatively small animal welfare and feed manufacturing network.

**2.2 Scope of the Feed and Food Service**

Trading Standards within PPP has responsibility for the following areas of the feed and food chain.

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

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

**2.3 Demands on the Feed and Food Service**

The Service offers confidential and impartial advice for businesses within its area. This includes dealing with complex and technical enquiries (such as allergen controls, nutritional and health claims, feed composition) along with inspecting, carrying out sampling, investigating complaints and monitoring activities; all of which are essential and significant proportions of the workload associated with feed and food service delivery.

The Food Standards Agency (FSA) has allowed local authorities to adopt a more flexible and varied approach in developing a suitable strategy to maintain compliance. Audits and sampling will continue to be targeted at nationally or locally recognised areas of concern. Where there is a Primary Authority arrangement in place, officers will have regard to any inspection plan published.

The FSA has developed a new food delivery plan, which is summarised and attached as Appendix B. It is anticipated that this new model will be adopted in Q2/Q3.

Although changeable, the Partnership currently has, at the time of writing, 3,164 food businesses as seen on the FSA’s registration database (1,324 in West Berkshire, 797 in Bracknell and 1,043 in Wokingham) liable for food standards intervention.

Local Authority Enforcement Monitoring (LAEM) provides a detailed snap-shot profile for feed and food hygiene matters in respect of the number, type, risk, locality, and so on. The LAEM returns are reliant on proper maintenance of database use and the PPP resources specialist officers to ensure database quality is maintained across the partnership. This is in addition to other ‘back-office’ support services that deliver the PPP model.

*Food Standards*

Of those 3,164 premises, where foodstandardsareconcerned, these premises consist of a mixture of high, medium, low, unrated programs. There are 39 High risk premises. These figures are subject to changes as the data is refined, and attention must be given to the new food delivery model whereby premises may change, dependent on activities, complaints etc., that affect the risk clarification.

In the previous year the team have worked hard to reduce the number of unrated businesses that had built up during the Covid-19 pandemic. This remains a challenge for the service as these need to be brought back into the audit program. With new businesses registered they go onto the unrated list, which is updated monthly, and is a priority to visit. The 2024/25 priorities work-plan for PPP recognises resources will need to go into this area of work to ensure those premises not yet risk assessed will need to be so, and as such this is included in the feed and food service plan.

*Feeding Stuffs*

In terms of feed premises there are 250 primary producers (including livestock farms) and 110 inland feed premises.

The risk rating for each premises is assessed at each visit and by reference to events such as levels of compliance, local risk, and the category of individual businesses. In addition, the service has regard to the principles of the Hampton Review [bud05hampton\_.pdf (regulation.org.uk)](https://www.regulation.org.uk/library/2005_hampton_report.pdf), ensuring that no inspection is conducted without reason and local risk factoring is applied.

*Primary Authority*

The PPP has Primary and Home Authority responsibilities, which includes allocating time to our major food producers. Currently, PPP has one arrangement in place relevant to the Trading Standards feed and food service: HiPP.

Primary Authority relationships are subject to change regards existing relationships and any addition of new relationships.

**2.4 Service Contact Details**

Email:

[tsadvice@westberks.gov.uk](mailto:tsadvice@westberks.gov.uk)

Telephone:

01635 519930 (Out of hours 01635 42161)

Located at:

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

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

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

Theale Offices, Theale Library, Church Street, Theale, RG7 5BZ

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

**2.5 Regulation Policy**

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

1)  The Regulators Code – this forms the guidelines that PPP uses for the basis for general enforcement work,

2) The Code for Crown Prosecutors – this forms the basis for decisions to prosecute in all criminal matters.

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

For the Code for Crown Prosecutors see:

[**https://www.cps.gov.uk/sites/default/files/documents/publications/code\_2013\_accessible\_english.pdf**](https://www.cps.gov.uk/sites/default/files/documents/publications/code_2013_accessible_english.pdf)

Regulators Code:

[**https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/300126/14-705-regulators-code.pdf**](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf)

**3.0 Service Delivery**

**3.1 Interventions at Food and Feeding stuffs establishments.**

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

There is a risk-based approach in relation to feed and food advice and enforcement. Resources dedicated to feed and food related activities are balanced against the demands of other regulatory activities. This risk-based approach allows more intensive regulation to be directed at those businesses presenting the greatest risk. The new food delivery model, as mentioned will impact on those risk ratings.

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

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

Where appropriate Animal Health Inspectors will carry out some of the feed and food hygiene inspections alongside their routine animal health visits.

**Table 1: Proposed Feed & Food Standards 2024-25 Intervention Program.**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Category | No of premises due (BFC) | No of premises due (WBDC) | No of premises due (WBC) | Total | Target/commentary. All figures for Food Standards inspections are an approximation due to transition of new database system, and changes expected from delivery model by March 2025. |
| HIGH | 2 | 18 | 19 | 39 | 100% delivery expected |
| All other food premises  New premises | 516  Updated monthly | 583  Updated monthly | 440  Updated monthly | 1,639 | As per FSA Code of Practice |
| Inland Feed | 5 | 8 | 7 | 20 | 100% delivery expected (funded visits) |
| Primary Production (feed and food) | 0 | 0 | 1 | 1 | 100% delivery expected (funded visits) |
| Regional Feed | Approximately 100 premises (outside of PPP area – within TSSE region) which are grant funded. 100% expected.  It should be noted that presently 0.6 FTE Officer is part funded to carry out feed inspections in other TSSE areas and that Officer is seeking to complete the Level 6 regulatory apprentice qualification. The Officer therefore has 1 day per week within PPP for feed work. | | | | |

**Table 2: Proposed Animal Health & Welfare 2024-25 Intervention Program.**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Category** | **No of premises due (BFC)** | **No of premises due (WBDC)** | **No of premises due (WBC)** | **Total** | **Target** |
| **HIGH** | **0** | **5** | **1** | **6** | **100% delivery expected** |
| **All other Animal Health premises – with inspectable risk due**  **New AH & Feed Premises** | **3 Medium, 4 Low, historic unrated 6**  **Updated monthly from APHA** | **83 Medium, 78 Low, historic unrated 113** | **26 Medium, 29 Low, historic unrated 15** | **357** | **Aim to carry 75% of all due medium risk and others as a result of intel / SRs.**  **100% delivery expected** |

**Table 3: Estimated resources required for Feed & Food Standards program.**

|  |  |  |  |
| --- | --- | --- | --- |
| **Risk Rating** | **No. of Premises**  **Due 2024-25** | **Estimated (hourly) time per intervention** | **Total** |
| A/High | 39 | 7 | 273 |
| All non-High risk food premises | 1,639 | 3 | 4917 |
| New food premises | Updated monthly.  Estimate 450 | 2 | 900 |
| Feed Inspections  Animal Health Inspections – High  Animal Health Other  New Animal Health & Feed Premises | 21  6  357  Estimated 120 | 6  6  3  2 | 126  36  1071  240 |

**3.2 Feed and Food Service Requests & Complaints**

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

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

We expect the number of service requests associated with feed and food matters for 24-25 to be in line with previous years.

**3.3 Primary Authority Scheme**

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

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

Currently we are in a primary authority relationship with one Food Company in relation to food standards matters HiPP UK Ltd.

**3.4 Advice to Business**

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

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

The Joint Public Protection Committee has agreed to continue supporting the Home Authority Principle but that this work will become chargeable at the same rate as Primary Authority work.

**3.5 Feed and Food Sampling**

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

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

We anticipate this will translate to approximately 70 food and feed samples being taken in the next financial year.

**3.7 Feed and Food Safety Incidents**

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

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

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

**3.8 Liaison with Other Organisations**

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

Partners include:

* Trading Standards Southeast Limited (TSSEL).
* Feed and Food related working focus groups across the Thames Valley and Southeast.
* National feed programmes across neighbouring areas delivered on behalf of the FSA.
* Public Health Teams to deliver healthy eating initiatives and alcohol consumption reduction.
* National Agencies where cross cutting issues are identified such as the Food Standards Agency, Environment Agency, Police, Social services, and educational establishments.
* Members of Bracknell, West Berkshire and Wokingham Councils on PPP strategic assessment and PPP work plan.

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

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

* Contributing to the wider public health agenda through the promotion of healthier eating options.
* Raise awareness of food issues to local food businesses and residents.
* Provide advice to local business at the time of routine visits about upcoming changes to legislation.
* Ensure that the effectiveness of promotional activities is evaluated via feedback from businesses and the public.
* Make use of the many guidance leaflets for business on feed and food topics. For example, those that are available to download from [www.businesscompanion.info](http://www.businesscompanion.info) and from the FSA.
* Implement the PPP Communication Strategy and further develop the PPP website and use of social media potential.
* Attendance at community fairs and events to promote the work of the PPP.

**4.0 Resources**

**4.1 Financial and Staffing Allocation**

Our primary resources are our staff. There are some 100 staff operating across PPP. The resources at the PPP’s disposal are diverse and range from support officers with administrative, intelligence and analytical database skills, trading standards officers, sampling officers, specialists in feed and food hygiene at primary production officers, animal health officers, food safety officers, environmental health officers, solicitors, and a technically qualified leadership and management team.

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

There is little scope at present to recover costs associated with such planned activity. However, the FSA have provided grant funding in the past for the delivery of regional feed inspections and food sampling programs, and it is anticipated that such funding will be forthcoming this year. The PPP also recover costs for its primary authority role. There is an allocated sampling budget for the PPP.

**4.2 Staff Development Plan**

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

The PPP strategic management team will ensure competency amongst staff involved in these areas of service delivery is maintained and embedded across all of PPP. This will incorporate better use and understanding of systems database, and application of regulatory skills and legal processes aimed at minimising risk to prosecution cases. This will also include ensuring that minimum continued professional development is maintained as required by the Codes of Practice i.e., at least 10 hours in core subject area, and no less than 20 hours overall annually.

**5.0 Quality Assessment**

**5.1 Quality assessment and internal monitoring**

The PPP have the resource in place to ensure;

* Regular Internal audit and monitoring of database quality.
* Performance targets within the Governance arrangements, which in turn supports many of the service delivery ambitions within the plan. For example, customer business satisfaction.
* Qualified and competent senior investigating officers assisting investigators preparing files for prosecution.
* A growing quality management system specific to feed and food matters, including an enforcement manual.
* Ensuring sample analysis is carried out only by laboratories that are accredited and appointed for the purpose of the various statutes.
* Established target setting through one to ones and appraisals.

**6.0 Review**

**6.1 Review of Delivery Plan**

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

* 1. **Identification of any variation from the Delivery Plan**

Variations from the plan will be reviewed at regular tasking meetings with management oversight**.** Variances will be documented, using operational risk registers and business continuity plans.If changes are made, they would be subject to final agreement by the Service Lead Public Protection under delegated authority, in agreement with the joint management board.

* 1. **Areas of Improvement**

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

* Ensuring that intelligence reports from sources such as the FSA direct our audit and intervention programme.
* Continue to improve the quality of data as we continue to move towards using a single database and that that database provides the information, we need to meet the Code of Practice requirements relating to the risk assessment of premise and the provision of statutory returns.
* Ensure any new system is in line with GDPR rules and recognised industry standards for the protection of all PPP stakeholders.
* Improve and promote communications by reviewing and implementing the PPP Communication Strategy.
* Ensure robust contingency planning by reviewing the PPP plans concerning emergency planning and business continuity.
* Prioritising potential high and medium risk along with new unrated premises
* Develop further a documented process / procedure for internal monitoring in line with the Code of Practice.
* Implementing the recent changes made in the Code of Practice around officer competency and authorisation linked into the services training and development plan.
* To revisit how the delivery of the PPP model can be better applied in delivering services to all stakeholders signed up to the inter authority agreement and improve accordingly.
* Adoption of the new delivery model.

**APPENDIX 1: Relevant Officers in relation to Food Standards, Feed and Animal Health**

|  |  |
| --- | --- |
| **Post Title** | **Team** |
| Strategic Manager – non operational | Community &TS |
| Principal Officer – non operational | Community & TS |
| Senior Trading Standards Officer 0.5 FTE, 0.4 for AH and Feed | Community & TS |
| Senior Trading Standards Officer 0.7 FTE | Community & TS |
| Trading Standards Officer 0.5 FTE | Community & TS |
| Fair Trading Officer 0.5 FTE | Community & TS |
| Senior Trading Standards Enforcement Officer 0.05 FTE | Community & TS |
| Enforcement Officer 0.05 FTE | Community &TS |
| Enforcement Officer (AH) 0.6 FTE | Community & TS |
| Enforcement Officer (AH) 1 FTE | Community & TS |
| Enforcement Officer (AH/Feed) 0.2 FTE | Community & TS |

**Appendix 2: New Food Delivery Model**

**Background**

The Food Standards Agency (FSA) have developed a new food delivery model to modernise the approach to food standards enforcement delivery to incorporate a new intervention scheme and decision matrix, allowing for official controls based on the risk posed by a food business.

Following development, the new model was piloted in 2021/22 with seven LA’s and is currently out for consultation with implementation being steered by the FSA, depending on the LA’s Management Information System, during 23/24.

It has been found that the old model and approach to interventions is no longer fit for purpose as it fails to support local authorities (LA’s) in targeting their limited resources, and with these limited and reduced resources LA’s have been unable to fully meet the requirements of the Code of Practice for Food Standards Delivery.

It is estimated that LA’s have, on average, 0.7 officers per 1000 food premises. Within PPP there are some 3164 food premises, with an average 2.3 FTE of qualified food standards officers within the food team. Therefore, PPP resources are more or less equivalent to the national average. The new model seeks to address these issues to enable LAs to target resources and increase their flexibility by looking at higher risk businesses and products.

The FSA’s main aims are to: -

1. Ensure that food is safe.
2. Food is as it is described.
3. Food is healthier and more sustainable.

**The New Food Delivery Model**.

The aim of the new model is to: -

1. Reduce harmful/non-compliant products.
2. Have a better exchange of information & intelligence.
3. Improve LA resources.
4. Increase pro-active responses.
5. Prevent issues turning into incidents.

Therefore, the model will see: -

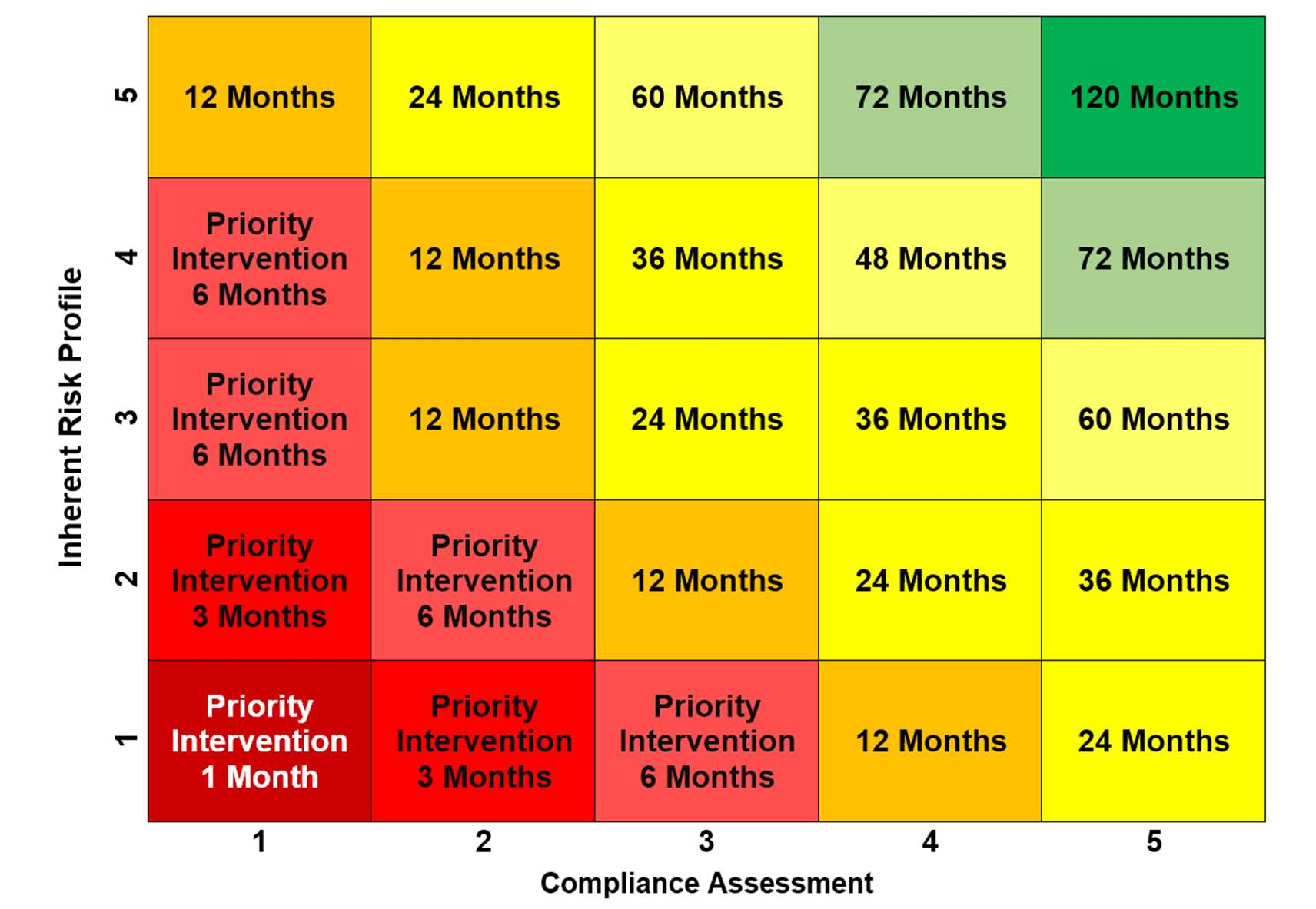
1. Intensive interventions
2. Target official activity based on intelligence.
3. Identify priorities.
4. Improve understanding of risk
5. Use intelligence to a greater degree and with more effectiveness.

It was found that before the new model there were 96% compliant businesses with 4% non-compliant. Using the new model in the pilot, this changed to 84% and 16% for compliant and non-compliant businesses respectively. There was an increase in intelligence led reactive interventions from 15% to 20%, and a high level of sample failures.

The new model requires businesses to be subject to a risk assessment, considering: -

1. Risk profile—looking at sale, supply and distribution; ease of compliance; the complexity of the supply chain; the responsibility for information; and the potential for harm (and numbers of people who may be subject to that harm)
2. Compliance assessment—looking at confidence in management; current compliance levels; management systems and procedures; and allergen information.

Officers from LA’s must apply the intervention rating scheme, carrying out risk scores and compliance scores in line with the precautionary principle. It is noted that these scores can increase or decrease on each inspection/intervention dependant on what is found. Having carried out this assessment a decision matrix will be applied.



As can be seen, depending on the scoring, it will affect the frequency of interventions.

The new model sets Key Performance Indicators (KPI’s) to identify measures to target resources, ensure compliance against the new model, provide assurances relating to food and food businesses, and ensuring LA’s meet their statutory obligations. They are set out as follows: -

1. Identify non-compliant businesses.
2. Appropriate and timely control activity
3. Utilise intelligence.
4. Positive changes in compliance
5. Local sampling
6. Identify new food businesses.
7. Strategic use of intelligence

The specifics of the KPI’s and how they will be measured is still being developed. From the pilot scheme there have been a number of positive comments indicating LAs are more effective to directing work to non-compliant businesses. These comments are: -

1. Ability to re-score businesses
2. Decision matrix easy to understand.
3. Matrix gives a more accurate assessment of risk.
4. Manufacturers are no longer put as high risk by default.
5. Remote interventions can be used.
6. Far better intelligence and information sharing

**Conclusion.**

The objectives of the new delivery model are to reduce harmful and non-compliant products. With limited resources LA’s can better target those resources to areas of greater risk. Furthermore, the model provides greater flexibility for officers to determine official control measures required. However, Officers will need training on the model and time to familiarise themselves with the new model and matrix in order to carry out assessments accurately.

The model is said to be dynamic as it takes into account changing resources, intelligence and changes in the market, dictating interventions and sampling. It is also designed to be more outcome focussed and seeks to bring business into compliance, rather than based on an approach that sets out numbers of interventions over a set period. Assuming the pilot’s findings are reflected across other authorities, the new model may put greater strain on resources initially whilst risks are assessed, and non-compliance is discovered and tackled. However, with better focus on non-compliant business, it will allow for better targeting of businesses that put the consumers most at risk.

**Transition to new model.**

FSA guidance [Food law code of practice (England)](https://www.food.gov.uk/sites/default/files/media/document/Food%20Law%20Code%20of%20Practice%20%28England%29%20-%20Parliamentary%20laying%20copy%20-%20accessible%20version.pdf) sets out the transitional arrangements that must be applied no later than the 31st March 2025.

**APPENDIX 3: Proposed sampling plan.**

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| --- | --- | --- | --- | --- | --- | --- | --- |
| **Project** | **Project Code** | **Analysis** | **When** | **Where** | **Cost of per sample** | **Number of samples** | **Total cost** |
| Ground Attack | F24B | Acrylamide | June | West Berkshire: Bracknell: Wokingham: | 218.84 | 3 | **656.52** |
| Manky Mince | F24C | species/protein/fat content | July | 3 local butchers/manufacturers in each area | 437.68 | 9 | **3939.12** |
| Oil Rigged | F24D | Oil substitution - | August | 3 shops in each area | £164.13 | 9 | **1477.17** |
| Double Glazed | F24E | PPDS glazed goods for allergens | September | 4 shops in each area, undeclared egg and milk in glazed products | £164.13 | 12 | **1969.56** |
| Kebabs |  | Allergens in kebab: milk | October | follow up from 22/23 project. | 164.13 | 12 | **1969.56** |
| How nice is your spice | F24G | Mycotoxins in spices | November | single spices | 437.68 | 6 | **2626.08** |
| Gulp on the God | F24H | Nutrition accuracy on smoothies/shakes | January | 3 shakes/smoothies from shops in each area | 437.68 | 9 | **3939.12** |
| Unauthorised insertion | F24I | GM rice | February | rice from China - restaurants/Shops | 273.55 | 6 | **1641.3** |
|  |  |  |  |  |  |  | **18218.4** |