



WARRINGTON
Borough Council

Public Protection and Prevention

Food & Feed Law Enforcement Plan

2024-2025

Revised August 2024

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Introduction & Scope

This Food & Feed Hygiene Plan (The Plan) deals with food and animal feed enforcement functions carried out by the Public Protection and Prevention Team.

The plan must cover all areas of food law that the authority has a duty to enforce and set out how it intends to deliver official controls within its area; considering any advice issued by the Food Standards Agency (FSA).

The Food and Feed Hygiene Plan adopted in 2022-2023 remained the delivery plan for 2023-24.

Service planning for 2023-24 has focused on maintaining critical operational insight and delivery, increasing management and operational capacity through reinvestment, and essential delivery around infectious disease control. This has ensured that we are now in a position to implement a revised Food and Feed Hygiene Plan that is risk based, targeted and commensurate to capacity, with opportunities to flex and respond.

1.0 Aims and Objectives

The Public Protection and Prevention Service is integral to the delivery of the Council's Corporate Strategy, protecting the health and wellbeing of our residents and visitors. We also aim to regulate in a way that drives up compliance and stimulates business growth.

Our Corporate Strategy 2020 - 2024 - at a glance

Our pledges and priorities			
Our residents live healthy, happy and independent lives	Everyone benefits from our thriving economy	Communities are safe, strong and our most vulnerable are protected	Our town is clean, green and vibrant
<ul style="list-style-type: none"> • People are healthy, safe and well • People have opportunities to thrive • High quality education and youth facilities • Early intervention to prevent long-term health conditions arising • Residents feel part of their community 	<ul style="list-style-type: none"> • A place where businesses invest and thrive • A place that provides opportunity for all • Invest in and provide access to the right skills and education • Sustainable employment opportunities • The right sustainable economy for the future 	<ul style="list-style-type: none"> • A safe place • Empowered, resilient and independent communities – people take responsibility for their area • Safeguard our children and adults and protect our most vulnerable • A place of culture, sport, wellbeing and lifelong learning • Delivery of our equality objectives • Actively support our residents, businesses and communities impacted by coronavirus 	<ul style="list-style-type: none"> • Reduce the impacts of climate change • Improve air quality • Manage waste effectively • Make best use of green spaces and natural resources • Clean streets and public places • Sustainable transport and travel
Crosscutting themes: sustainability, reducing inequalities & COVID 19 recovery			

Our values:

- **Open, honest and accountable** – listen to and learn from our communities, do what we said we would
- **Treating people fairly & equally** – respect our customers and each other, challenge discrimination and inequality
- **Spending money wisely** – be financially sustainable, looking for different and better ways of delivering key services
- **Working in partnership** – build relationships and work collaboratively with others to maximise our strengths and resources
- **Forward thinking** – open to change, new challenges and innovative ways of doing things
- **Working with and engaging communities** – encourage and empower people to build their own strengths and abilities, encouraging residents to take pride in their area

Our aims are:

- To carry out interventions at premises based on risk, at the frequency determined by the rating system detailed in the Food Standards Agency (FSA) Food Law Code of Practice (revised 2023), to protect public health.
- To ensure that the requirements of the Food Hygiene Rating Scheme are consistently and fairly applied for the benefit of businesses and consumers and that a full range of appropriate improvement techniques including advice and enforcement are used.
- To systematically reduce backlog of Food Standards and Hygiene inspections using a risk-based approach.
- To offer advice to existing and prospective business operators; promoting high standards of compliance, which in turn promotes business and consumer confidence.
- To assess and, where appropriate, investigate all complaints and allegations of fraud relating to food and/or feed businesses in conjunction with the FSA Food Crime Unit.
- To assess and where appropriate investigate reports of food-related illness to control any cluster/outbreak and to prevent/minimise the risk of recurrence.
- To enforce food and feed legislation in a proportionate, transparent and consistent manner in the public interest, in accordance with national guidelines and our own Enforcement Policy.
- To work with colleagues in the Food Standards Agency (FSA), Public Health team, Animal and Plant Health Agency (APHA) , Department for Environment, Food and Rural Affairs, (DEFRA) UK Health Security Agency (UKHSA), regional colleagues and other partners to promote health and wellbeing.
- To ensure that inland imported food controls are appropriately identified and addressed.
- To ensure that an appropriate Food Sampling plan is developed and implemented.

2.0 Background

2.1 Profile

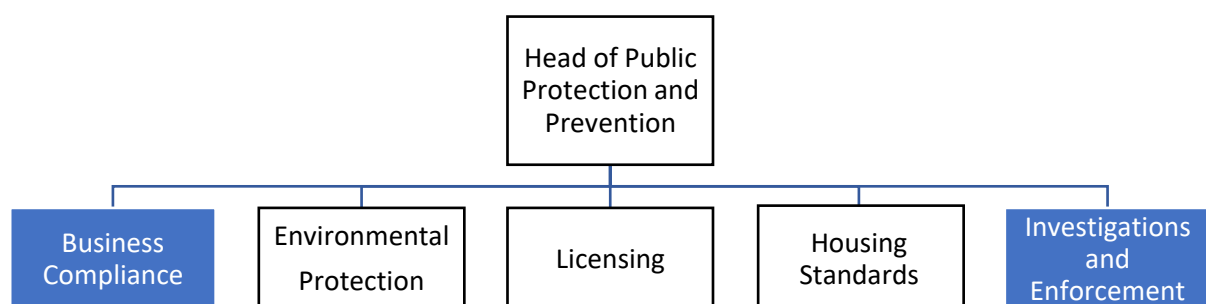


Warrington stands on the banks of the river Mersey and covers 70 square miles across the north-west of England. It is made up of small suburbs and villages as well as more densely populated areas around the town centre. Warrington is made up of 22 wards which were changed in 2016 following a boundary commission review.

The population has grown quickly over the past 30 years because of the new town developments and Warrington is home to 211,580 residents (ONS 2022 mid-year estimate).

2.2 Organisational Structure

Food Hygiene, Food Standards and Feed Hygiene enforcement is carried out by teams within Public Protection and Prevention. The structure is provided below with the relevant teams who carry out food and feed functions shaded in blue. Business Compliance leads on food hygiene, standards and business support and advice, whilst Investigations and Enforcement lead on feeds and animal welfare. The service is based around a shared regulatory model, which seeks to promote resilience and joint problem solving.



2.3 Scope

Food activities are carried out by 'competent' officers as defined in Chapter 3 of the Food Standards Agency Food Law Code of Practice. A local scheme of delegation exists within the service and specific authorisations are tailored depending upon the competency of officers.

The Business Compliance Team are responsible for:-

- Hygiene and Standards Interventions in Food Businesses
- Issue of export certificates
- Food sampling
- Investigating of Food Poisoning / Infectious Diseases
- Responding to Food Alerts
- Investigating complaints about food and food businesses
- Health & safety enforcement
- Skin piercing
- Private water supplies
- Public Health Funerals
- Smoke free legislation
- Business advice
- Investigation of complaints about the supply of age restricted products.
- Compliance checks of off-licensed premises.
- Scrap metal dealer and collector licensing

In respect of feed and agriculture activities these are conducted by officers housed in the Investigations & Enforcement Team but are authorised in accordance with the Feed Law Code of Practice. These officers maintain their professional competencies and are authorised under the local scheme of delegation which is maintained by the Service.

2.4 Demands

Premises Profile

The premises profile as of January 2024 comprised of 2,226 premises for food standards and 2195 registered food businesses for food hygiene.

This includes unrated businesses and businesses outside the inspection regime.

Food Standards Premises Profiles January 2024

Risk Category	Food Standards
A	0
B	717
C	832
Unrated	677
Outside Programme	0
Total	2226

Several food premises will also be feed hygiene premises, so will be counted in both the food standards and feed hygiene totals.

Food Hygiene Premises Profile January 2024

Risk Category	Food Hygiene
A	4
B	59
C	268
D	799
E	644
Unrated	71
Outside Programme	0
Total	2195

Approved Premises

There are currently 8 food premises that are approved in accordance with EC Regulation 853/2004.

Identification Code	Name	Summary of Approval Types	Summary of relevant foods
4108	F Houghton & Family (Wholesale Butchers) Ltd	Cold Store, Cutting Plant, Processing [Food Standards Agency Approval]	Minced Meat preparations
WR022	Abbey Eggs	Processing Plant and Packing Centre -	Eggs
WR023	XPO Logistics Ltd	Cold Store	General
WR025	The Hut Group	Re-wrapping, processing	Dairy, Egg, Collagen, Gelatine, Fish
WR027	Coffee House	Processing	Meat, Dairy
WR028	Sykes Seafood	Cold Store	General
WR029	Tatry Trade Limited	Cold Store	General
WR030	Fuel Hub	Processing	Meat, Fish

Feed Hygiene Premises Profile January 2024

There are 103 feed premises within the Borough.

Premises type	Number of premises
Approved premises	0
Registered premises	103
Premises not yet registered	0

2.5 Service Delivery Points

The Public Protection and Prevention team is based in 1 Time Square in the heart of the Town Centre.

The service also receives contact through electronic routes including team specific mailboxes and via the Citizens Advice Contact Service (CACS).

2.6 Enforcement Policy

The service has published its Enforcement Policy:

[Environment and transport - Public protection and prevention enforcement policy 2022 \(warrington.gov.uk\)](https://www.warrington.gov.uk/environment-and-transport/public-protection-and-prevention-enforcement-policy-2022)

This is regularly reviewed. The proposals to change the framework for Out of Court Disposals will be kept under review.

3.0 Service Delivery

3.1 Interventions

3.1.1 Interventions at Food Hygiene Establishments

Risk Categories

The Food Law Code of Practice (England) June 2023 identifies the risk category that food premises should be allocated following an intervention which in turn dictates the frequency of intervention requirements.

Food Hygiene

Risk Category	Intervention Frequency	Interventions Required by Food Law Code of Practice, England
A	6 Months	Inspection / Audit or Partial inspection
B	1 Year	
C	18 Months	Inspection/ Audit or Partial Inspection until broadly compliant and then alternate above with another Official Control such as Sampling, Monitoring, Surveillance or Verification
D	2 Year	Alternating between Official Controls and (for lower risk Ds) Non-Official controls
E	Alternative Enforcement Strategy or Intervention every 3 Year	A programme of Alternative Enforcement Strategies or interventions every three years
New Businesses (UNRATED)	1 month	Undertake a visit within 1 month of opening following triage of likely risk

The Hygiene interventions planned by the Council are currently concentrating on Inspection / Audit across A-D risk categories.

Flexibilities for D rated Premises

The Food Law Code of Practice allows us to alternate between an official and non-official control for D rated premises.

Following on from the successful implementation of an Alternative Enforcement Strategy for E rated businesses and advice from the Food Standards Agency we intend to utilise this flexibility in a pilot scheme. This will involve undertaking an educational visit in at least 50 D rated businesses that are due an intervention before the end of Quarter 3.

We will do this by carrying out an educational visit where we will also confirm that the ownership remains the same, identify any significant changes in food production and review the businesses' food safety management system. The success of this programme will determine if this continues into the next quarter.

Non-official controls will not be undertaken for our full quota of D rated premises as this will create a surge in demand for inspections in 2 years' time when an official control will be required.

Alternative Enforcement Strategy

Many of our E rated businesses have not been inspected for many years as higher risk premises have been prioritised. However, without deploying proportional resources to these E rated businesses we will never have a picture of any changes which may change their risk and allow us to make an informed decision as to whether that business should be prioritised for action.

Changes that can influence risk include: changes in ownership or closure, changes in the type of food handled, how it is handled, where it is sold or the size of business.

To mitigate risk to the public, in the first quarter of 2024/2025 we have successfully piloted an Alternative Enforcement Strategy where businesses are asked to complete a questionnaire which is then reviewed to enable us to determine whether:

- the premises should be inspected by an authorised officer as the risk has changed
- the premises should be visited to verify the information provided or to gather missing information
- the premises can be reviewed again in 3 years (subject to any complaints, information or requests for advice in the meantime).

In addition to self-completed questionnaires colleagues visiting food businesses for other purposes are asked to complete or leave a questionnaire with the business.

Food Hygiene Intervention Revisits

Following an inspection, a revisit will be carried out if the officer has identified significant contraventions. This decision is made having regard to risk scores for hygiene, structure, confidence in management or control systems and in accordance with the Food Law Code of Practice.

Businesses which have been rated with a National Food Hygiene Rating score of below 3 will be subject to a revisit to ensure that necessary improvements are underway. Appropriate enforcement action in the form of a warning letter, Hygiene Improvement Notices, formal legal action or, where there is an imminent risk to health, Hygiene Emergency Prohibition Notice or Voluntary Closure may also be used.

National Food Hygiene Ratings Re-Score Visits

Warrington Council operates the Food Standards Agency National Food Hygiene Rating Scheme (FHRS).

Businesses which fall within the scope of the scheme will be issued with a FHRS Score (from 0 to 5) following an appropriate intervention carried out at the premises. The score is published on the Food Standard Agencies FHRS website and the business may display its score

on site. The FHRS scheme allows for a Food Business Operator to appeal their score or request a rescore re-inspection; rescore requests are only accepted where the FBO has demonstrated compliance with outstanding matters.

Re-inspections to rescore visit applications must be accompanied by the appropriate fee. More information may be found here on the Council’s website. [Food Hygiene Rating Scheme – Information for Customers and Businesses | warrington.gov.uk](https://www.warrington.gov.uk/food-hygiene-rating-scheme-information-for-customers-and-businesses)

Many food aggregator platforms through which consumers order food for delivery have put minimum Food Hygiene rating Scheme scores in place. Businesses falling below the required score are removed from the platform. This incentivises compliance, underlines the need for consistent and fair scoring and has increased the demand for inspection and scores where initial scores are low.

EU and “Rest of World” Imports

Premises that receive imported food directly or indirectly will be inspected in accordance with their normal risk rating. Their activities (including import) are considered when risk ratings are given. During the course of a visit to any food premises, the inspecting officer will carry out such checks as are necessary, to ensure that any imported food has been subject to the relevant checks to ensure the safety of the food.

Imported Food is included within officer’s competency matrix and the subject is therefore included in officers’ training programs. An Imported Food Lead officer is in place and procedures are in place to ensure that imported food is effectively dealt with,

Any food that is of concern will be subject to actions in accordance with the Warrington Council Enforcement Policy and the Food Law (England) Code of Practice. Support and guidance may also be sought the Food Standards Agency, as appropriate.

3.1.2 Interventions at Food Standards Establishments

The existing system is as follows but it is planned that this will be superseded by a new system before 31st March 2025.

Category	Minimum Intervention Rating	Type of Intervention
A	12 months	Inspection / Audit
B	24 months	Inspection / Partial Inspection / Audit
C	60 months By Alternative Enforcement Strategy (AES) or intervention	Inspection / Partial Inspection / Audit / Verification
U		Inspection / Audit

Food Standards Intervention Revisits

Following an inspection, a revisit will only be carried out if the officer has identified significant contraventions. This decision is made having regard to levels of compliance, confidence in management and control systems, as defined in the Food Law Code of Practice (England).

3.1.3 Interventions at Feed Hygiene Establishments

Inspection of Feed Establishments

In line with National Priorities for Feed Law Enforcement, officers will undertake the following inspections.

Approval/Registration Activity Code	Premises Type
R1/R2//R4/R6	Premises manufacturing or placing on the market additives, premixtures etc. (not subject to approval) Manufacturers of compound feed (not subject to approval)
R4	Mobile mixer
R5	Premises buying and selling compound feeds but not manufacturing
R6	Pet food manufacturers
R7	Premises manufacturing or placing on the market of feed materials Supplier of Surplus Food for Feed
R8	Transporter of feed and feed products
R9	Storage premises for feed/feed products
R10	Mixing feed on farm, with additives and pre-mixtures
R11	Mixing feed on farm, with compound feeding stuffs which contain additives
R12	Food businesses selling co-products of the food industry destined as feed materials
R13	Livestock farms (including fish farms) which do not mix feeds or mix feeds without additives
R14	Arable Farms

3.1.4 Food Hygiene at Primary Producers

The EU Food Hygiene Regulations applicable to Primary Production came into effect on 1st January 2006. Previously, only certain types of farms that produced foods of animal origin were covered by specific food hygiene legislation. Now, the general principles of food hygiene legislation extend to all businesses engaged in primary production of food, although there are minor exclusions.

Currently 115 premises have been identified as Primary Producers of all categories. Food and Feed colleagues are working together to review the accuracy of the data and identify premises where interventions should be prioritised. See also section 4.2

3.1.5 Historical Context

During 2020-2021, as resources were diverted to meet Covid priorities, the Food Standards Agency allowed the reprioritisation of official food controls in accordance with their recovery plan. The service was represented on the national Covid Compliance and Enforcement Task Group and its approach was cited as a good practice case study by the Local Government Association: [Warrington: Working side-by-side with public health | Local Government Association](#)

The outcome of this approach is that Local Authorities were left with an increased backlog of inspections to complete because of national lockdown restrictions (where premises were closed for extended periods of time), or because of the redirection of resources to the Covid response. This backlog included premises due an intervention in 2020-2021 and those scheduled within the first half of 2021-2022. The Authority worked in accordance with the FSA Recovery Plan. At that time.

3.1.6 The Council's response

See also section 4.2 "Action Planning"

- **Food Hygiene**

Officers are assigned inspections based on their competence and authorisation.

Priority is given to unrated premises deemed as being higher risk and A-C hygiene rated premises, as well as unrated (new businesses). Some inspection of lower risk premises where specific intelligence on risk is received or for training / development purposes.

There is a national shortage of suitably qualified officers for the delivery of official food interventions, agency staff have been used to supplement newly authorised officers, appointed directly by the Council.

- **Food Standards**

Food standards interventions are being undertaken at the same time as Food Hygiene interventions by qualified officers as inspections. This will help ensure that pre-packed for direct sale changes are understood and implemented. Monitoring is undertaken to identify any higher risk food standards interventions which are not due food hygiene interventions. Additional food standards inspections can then be targeted dependent upon risk and resources.

Any sampling work for food standards will be addressed during routine inspections or in response to complaints as necessary. Sampling plans are to be developed.

We will be working closely with Trading Standards North West Executive to respond to any agreed regional sampling requirements identified nationally or in the region.

Wherever possible where a Food Standards intervention is due it will be carried out at the same time as a Food Hygiene intervention. Food Standards is included in Food Officers' Training and development programme.

3.2 Food and Feed Complaints

3.2.1 Food Hygiene Complaints

The Council aims to ensure that all complaints regarding unfit food, out of condition food, alleged illness or the condition of food premises are assessed and where appropriate investigated appropriately. Action will be taken to remove any food or feedstuff from the retail chain, which does not meet current legislative requirements.

3.2.2 Food Standards Complaints

All complaints of relating to food labelling, claims and descriptions, composition of food, adulteration of food, chemical contamination of food and the nature of food, will be assessed. Action will be taken where appropriate and in proportion to the potential risk posed.

Complaint samples will be taken and submitted to the Public Analyst for analysis where necessary.

3.2.3 Feed Hygiene Complaints

All complaints relating to unwholesome/contaminated feed, feedstuff composition and labelling, transport and storage and pet food are assessed, and action taken, in accordance with the hierarchy of enforcement set out in the Enforcement Policy.

Samples may be taken and submitted to the Public Analyst for analysis where appropriate.

3.3 Advice to Business

3.3.1 General Advice

The Council will, upon request from food businesses, provide basic advice, support, and guidance to encourage compliance and promote a fair-trading environment.

Particular attention is given to community-based food groups who are able to receive and advice visit free of charge.

In addition to this basic advice the service may also undertake chargeable consultation work, either as part of a Primary Authority agreement, or for advice on setting up a food business, pre-inspection, or advice on improving their food hygiene rating. Details of this service and charges are published on the Council's website.

3.3.2 Primary Authority Scheme

The Primary Authority scheme came into effect on 6th April 2009 and is designed to ensure consistency and improved coordination of local inspection and enforcement activities.

Currently there are 4 businesses within Warrington who have a Primary Authority agreement for food standards for food hygiene.

More information on Primary Authority and to see a list of all agreements held by Warrington Council can be viewed on the Primary Authority website.

[Local regulation: Primary Authority - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

3.4 Feed & Food Sampling

The United Kingdom Health Security Agency (UKHSA), Food, Water and Environment Microbiology Laboratory will be used for microbiology samples.

Public Analyst Scientific Services will be used as appropriate and in accordance with Section 39 of the Food Safety Act 1990, as the Public Analyst for the provision of competent and accredited laboratory services for Warrington Borough Council.

Samples taken in response to a complaint will be assessed on an individual basis and action taken as appropriate.

Food and feed samples taken and submitted for analysis will be targeted in relation to national and regional surveys, or in response to complaints as appropriate.

Food samples (including water) submitted for bacterial analysis may be taken for the following purposes.

- Participation in national sampling schemes.
- Cheshire and Merseyside Food Group sampling projects.
- In response to a complaint, incident or outbreak
- To verify HACCP Procedures.
- As a paid service to food businesses (including Approved Premises)

3.5 Control & Investigation of Outbreaks and Food Related Infectious Diseases

We will assess reports of illness and we will investigate confirmed cases of food poisoning to establish, where possible, the cause of the illness and to ensure that appropriate action is taken to ensure that any ongoing risk is adequately mitigated against. Such investigations could potentially include:

- Interviewing of persons.
- Taking food samples.
- Taking environmental samples.
- Provision of kits for faecal specimens.

- Collection and examination of case histories.
- Managing the exclusion of cases from workplaces / settings until such time as a return does risk transmission of the illness.

Any identified links to a food premises will be investigated as appropriate.

To ensure that a coordinated approach is provided in the case of any outbreak, the Cheshire and Merseyside Communicable Disease Operational Procedures have been agreed with UKHSA. This formalises the investigation under the leadership of the Consultant in Communicable Disease Control to provide liaison between Environmental Health Professionals, UKHSA and other cooperating bodies.

3.6 Food & Feed Safety Incidents

3.6.1 Food Alerts

The FSA issues Product Recall Information to let local authorities and consumers know about problems associated with a specific foodstuff.

A “Product Recall Information Notice” is issued where a solution to the problem has been put in place for example the product has been, or is being, withdrawn from sale or recalled from consumers.

A “Food Alert for Action” is issued where intervention by enforcement authorities is required. These notices and alerts are often issued in conjunction with a product withdrawal or recall by a manufacturer, retailer or distributor and provide local authorities with details of specific action that is required to be taken on behalf of consumers.

An ‘Allergy Alert’ is issued by the Food Standards Agency to quickly communicate allergen risks directly to the consumer. Competent Authorities receive copies of these Allergy Alerts for information purposes only.

In accordance with the Food Law Code of Practice, Warrington Council has a procedure for dealing with food incidents and hazards which includes details of arrangements in place to deal with such situations. Any subsequent action will then be based upon the risk associated with the level of notification.

3.6.2 Feed Alerts

There is a likely system in place to communicate and manage incidents related to feed hygiene concerns.

3.7 Liaison with Stakeholders and Other Organisations

Food and feed law enforcement liaison is undertaken with a range of internal and external agencies, neighbouring authorities, and national and regional organisations to share information and intelligence and present a consistent approach to advice and enforcement. These include:

- Food Liaison Groups – Cheshire and Merseyside Food Technical Group, Trading Standards Northwest (TSNW) Food Standards Focus Group.

- TSNW Feed and Agriculture Group.
- Public Analyst – For analysis and opinion in respect of samples and standards.
- UK Health Security Agency, Food, Water and Environment Microbiology Laboratory - Microbiology Samples.
- UK Health Security Agency – Food related and infectious disease control.
- Community Infection Prevention and Control – Community Infections.
- FSA – Service standards and policy development.
- State Veterinary Service – TB notifications.
- APHA and DEFRA - animal by-product issues, TB which has been identified in relation to the feeding of raw pet food, and other issues.
- Internal Departments – Public Health, Development Control, Building Control, Licensing; and
- External Bodies – Cheshire Police, Cheshire Fire and Rescue.

3.8 Promotional Work and other non-official interventions

3.8.1 Food Hygiene

The Cheshire and Merseyside Food Technical Group consists of Cheshire and Merseyside Food Safety Officers and representatives from UK Health Security Agency and other relevant organisations. This group formulates the work plan for specific projects and sampling at the start of each financial year.

Local sampling initiatives are undertaken when these specific products or premises can be incorporated into our sampling programme.

3.8.2 Food Standards

Trading Standards Northwest (TSNW) is a regional group of Trading Standards services in the north-west of England designed to assist in the coordination of Trading Standards activities in the region as well as sharing knowledge and best practice. TSNW is grouped along functional lines, including a Food Standards Focus Group which meets quarterly; governance is held by the TSNW Executive.

3.8.3 Feed Standards

The TSNW Feed and Agriculture Group also sits under the governance of the TSNW Executive meeting on a quarterly basis. The Panel shares knowledge and best practice to ensure consistency of approach across the region. Regional priorities are set in conjunction with the FSA, and an annual inspection programme developed for each of the authorities within the region. Progress in relation to the programme, and any issues arising, are discussed as part of the regional Panel meetings.

In addition, wider liaison can be achieved via the groups and discussion of the dedicated feed and agriculture groups on the KHub.

4.0 Review of 2022-2024

Performance is shared with the Head of Service. The delivery of official food controls is monitored corporately, as part of the Council’s performance management system.

In addition to quantitatively monitoring there is a programme of record checks and accompanied visits to ensure that service delivery is in accordance with the Food Law Code of Practice.

Results are considered during team meetings and at officers keeping in touch meetings where their training and development needs are reviewed. Officers participated in the FSA co-ordinated consistency exercises during the period.

4.1 Review of 2022 – 2024

Table 4-A Food Hygiene Inspections					
Rating	2022-23 ¹ Number Due	2022-23 Inspections ²	2023-24 Number due	2023-24 Inspections ²	Overdue on 1/4/2024
A	1	2	1	1	0
B	17	16	27	27	0
C	56	53	201	154	0
D	226	209	440	239	140
E	701	87	622	31	611
Unrated ³	34	34	41	28	0
Other³		273		225	27
Total Routine Visits		674		689	

Table 4-B Food Standards Inspections				
Rating	No. due during year starting 1/4/2022	2022-23 Standards Inspections	No. due during year starting 1/4/2023	2023-24 inspections
A ¹	3	1	0	0
B1	166	3	154	14
B2	556	12	507	34
C	647	10	637	36
Unrated ²	547	18	651	61
Other		52		35
Total		96		96

Notes to table

¹At the start of each year we identify the businesses that are due an inspection during the year. The figure will vary as we will assume that businesses due for intervention every 6 months will be inspected twice but the score may change or a complaint or a change in ownership may prompt an inspection.

²The number of inspections completed may be less than inspections due for a number of reasons including:

- The business that was due for inspection has closed or changed hands (any subsequent inspections to the premises will be recorded as inspections at unrated businesses)
- The authority did not have the capacity to inspect the premises.

³New businesses register with the Council continually (approximately 20 a month) we aim to inspect within 28 days of them opening. Where we cannot achieve this, we prioritise businesses undertaking higher risk activities. These figures represent routine visits to new businesses.

Table 4-C Comparisons of Outputs and demands Year-on-Year		
Activity	2022/2023	2023/24
Written Warnings	187	271
Hygiene Improvement Notices	14	17
Hygiene Emergency Prohibition Notices	0	0
Voluntary Closures	2	4
Seizures of food including imported food	0	2
Revisits	41	149
Re-inspections to re-score a food business	8	58
Food Sampling	39	40
Export Certificates issued	29	103
Premises Hygiene Complaints	66	78
Food Labelling	10	22
Unfit Food	28	39
Suspected Illness	71	65
Foreign Body Complaints	21	16
Infectious Disease Notifications	45	122

Table 4-D Food Business Turnover					
	2019-20	2020-21	2021-22	2022-23	2023-24
Food Business records closed	242	111	298	263	188
Food Business Records opened	139	198	200	189	237

Table 4-E Food related Demand Trends over last 5 years					
	2019-20	2020-21	2021-22	2022-23	2023-24
Food Export Certificates Issued	20	22	25	29	104
Food re-score inspections	17	3	17	20	58
Infectious Disease Notifications	70	22	27	46	120

Commentary

During the period 2023-2024 we encountered significant long-term absence within the Business Compliance Team together with 1 full time equivalent officer leaving the service followed by a delay in recruiting due to a national shortage of appropriately experienced and qualified officers. We were able to recruit a recently qualified officer who commenced work in September 2023.

This has impacted some areas of performance including some progress on officer development and the ability to address overdue lower risk inspections.

Agency colleagues provided cover for the absences but consequently we have not made the inroads into the backlog of inspections that we envisaged.

Demand

A rising number of revisits reflects the difficulties that some areas of business are encountering in achieving compliance. There is a corresponding increase in the number of businesses requesting a paid for reinspection and rescore after receiving a lower rating.

There has been a dramatic increase (over 100%) in infectious disease notifications. These include notifications of infections such as Shiga Toxin producing *E coli* infections which may involve a protracted interventions from officers seeking to identify the source of the infection and, working with UKHSA, reduce the risk of onward transmission.

The number of planned visits fluctuates form year to year as can be seen by the number of D rated inspections due 23/24 as opposed to the previous year. This is a result of a high level of inspections being undertaken 2 years previously by agency staff.

EU Exit has resulted an increase in demand for Export certificates as can be seen by the figures above. The above activity table does not include none-food demands which also impact food officers as they undertaken other functions.

Database

A project was undertaken in 2022/23 to identify E rated businesses that have moved, changed activity or closed and this has allowed us to undertake some updates to our database. This is reflected in the number of food business records we closed in 2022-2023

We also adopted the Food Standard's Agency's Register A Food Business (RAFB) system in 2023 which allows food businesses to register using a web-based form. It is likely that this will make it easier for businesses to register and we are likely to have a more accurate picture of new unrated businesses being started.

At the beginning of 2024 we met with Food Standards Agency representatives to discuss our service delivery planning. This constructive dialogue has informed a review of our action planning (see below). In particular we the approach to conducting Food Standards inspections with hygiene inspections and the adoption of an Alternative Enforcement Strategy for our E rated hygiene premises has benefited from FSA Advice.

4.2 Action Planning

1. The Food intervention procedure has been amended to ensure that Food Standards interventions are undertaken by a suitable qualified and authorised officer at the same time as Food Hygiene interventions.
2. Currently there is a high correlation between businesses that are due standards visit and those that are due a hygiene visit. We are therefore concentrating on delivering the hygiene programme and undertaking standards interventions at the same time. We will be reviewing delivery regularly to ensure that any outlying high-risk premises are being addressed (particularly after the introduction of the new Food Standards delivery model).
3. Where appropriate, suitably qualified and authorised officers will undertake Food Standards inspections when undertaking weights and measures visits at licensed premises.
4. We are piloting the use of qualified officers working in non- food teams to provide support during an incident or high demand periods. We are also committed to joint working with our Public Health Team, drawing on their support, where it is appropriate to do so. We are also exploring wider system-based solutions to divert and manage wider demands, releasing even further capacity for food hygiene and standards interventions.
5. We continue to review and develop our procedures to ensure that they are effective and robust. We have invested in a subscription to a database of procedures to assist in this and to give an additional resource to less experienced officers.
6. Whilst there remain wider corporate controls over expenditure in accordance with financial provisions and regulations, we have invested a recurrent £96,000 to in additional resources, since 2021/22. A capacity review was undertaken in 2022/23 and a further recurrent investment of £112,000 was made. This represents a

considerable investment during a period of financial challenge and scrutiny over corporate priorities and investment. This has recent investment has resulted in:

- a. The creation of an additional Principal Officer post within the Business Compliance Team which was filled in November 2022 to provide additional capacity in the support, governance and delivery of Food Hygiene and allow the other Principal Officer to dedicate more time in the delivery of the Food Standards elements of the service.
 - b. An additional officer to create further capacity amongst food authorised officers within the team. A recently qualified officer commenced work within the team in May 2024
7. The service has responded positively to the considerable challenges posed by the lack of experienced and competent practitioners coming into the system, as identified in the FSA Local Authority Capacity and Capability Report published in November 2023. The service has brought new graduates into the profession to build resilience, however this takes time and commitment to develop competencies and experience, which impacts on shorter term delivery and performance. We continue to feed into the Local Government Association Workforce review , whilst seeking to adopt alternative methods of securing additional capacity from which to deliver the programme of interventions. .
 8. We have continued to engage agency staff to support the delivery of the food service during times of staff absence and development, with two (1.6 Full Time Equivalent) officers currently deployed via agency. However, we recognise that this model is not sustainable due to the considerable financial investment required, and the need to develop longer term solutions. However, the short-term investment demonstrates the Council's commitment to reaching an optimum operating capacity from which to deliver its official controls. Agency colleagues are providing additional support in training recently qualified officers and assisting in reducing the volume of overdue inspections.
 9. Work to create capacity for food authorised officers is continuing e.g.: diverting non-food related work and through reviewing and streamlining processes.
 10. We continue to use our single regulatory model to utilise the support of colleagues in Trading Standards, which has included the gathering of intelligence on our Primary Producers which we will review to identify premises requiring intervention outside of the programme.

4.2.1 Staff Resources

¹Including managers who hold an authorisation

Table 4-F Food Hygiene and Standards Resources at January 2024				
	Number	FTE Hygiene	FTE Standards	FTE Food
Permanent Staff ¹	7 (FTE 6.5)	3.2	1.5	4.7
Agency staff	3 (FTE)2.6	2.1	0.5	2.6

Table 4-G Variations in staffing during 2022-24								
	2022 Q1	2022 Q2	2022 Q3	2022 Q4	2023 Q1	2023 Q2	2023 Q3	2023 Q4
Total Food FTE in post	5.5	5.5	4.7	4.7	4.7	4.7	4.7	4.7
Food FTE Vacant	0.8 ¹	0.8	1.6 ²	1.6	1.6	1.6	0.8 ³	0.8
Of which Food FTE Absence / restricted duties	0	0.8	0	0	2.4	1.6	0.8	2.0
*Of which undertaking training ⁴	2.4	2.4	2.4	2.4	0.8	0.8	1.6	1.6
Agency Food FTE	2.2	2.2	2.2	2.2	0	1.6	2.6	1.6

¹ New post

² Officer left

³ Officer recruited

⁴ This figure reduces as officers reach a level where they are above to undertake a full range of risk rated premises

5.0 2024-2025 Work Programme

At the start of each inspection year the routine inspection programme, based upon the Food Law Code of Practice, is generated.

A review of the inspection requirements will be carried out again for prioritisation from 1st April 2024 to ensure that the programme is on track and that the highest risk premises continue to be inspected above those of lower risk.

5.1 Food Hygiene Inspection Requirement 2024 – 2025

(Food Law Code of Practice)

Table 5-A Hygiene Interventions Required 2024-25						
Rating	Quarter 1	Quarter 2	Quarter 3	Quarter 4	2024 – 2025 Total	Backlog Awaiting inspection (at Jan 24)
A ¹	3	2	3	2	10	0
B	6	17	27	10	60	0
C	30	24	39	64	157	4
D	138	72	49	43	202	134
E	33	47	30	45	113	644
Unrated ²	50	50	50	50	200	43
Total	260	212	198	214	600	782
Overall Total					1382	

¹As category “A” premises are required to be inspected once every 6 months it is estimated from the 1st and 2nd quarter that these premises will be mirrored in the 3rd and 4th quarter. If following the initial inspection, a category “A” premises has improved it may be then classified as a category “B” premises and therefore not be inspected until 12 months later.

²Unrated premises are Food business that have registered with the authority but have not yet had their risk rating determined. Any identifiable higher risk premises are prioritised for inspection. There is sometimes a considerable delay between registering and opening and this is reflected in these figures. We currently receive around 50 new Food Registrations per quarter and we have used this figure as an estimate for service planning.

5.1.2 Revisits

Revisits will be carried out in accordance with details provided in section 3.1.1.

Paid for rescore reinspection’s will be undertaken within 3 months of the applications in accordance with the Food Law Code of Practice, England.

5.2 Food Standards Intervention Requirement 2024-2023

(Food Law Code of Practice)

Table 5-B Hygiene Interventions Required 2024-25						
Rating	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Backlog Awaiting inspection in Jan 2024	2024 – 2025 Total
A	0	0	0	0	0	0
B1	4	0	1	1	136	142
B2	8	8	7	10	466	499
C	21	21	9	11	588	640
U	50	50	50	50	72	272
Total	33	29	17	22	1262	1553

For Category A premises, where quality assurance systems are to be assessed, only officers who possess either a quality assurance qualification or equivalent professional experience and competency to enable them to assess quality assurance systems will carry out this intervention.

The Service Delivery Model for Food Standards is changing during 2024/2025. This will mean that the way that minimum intervention frequencies is calculated will change. Consequently we will need to carefully monitor how Food Standards interventions are carried out and, as stated above ensure that high risk premises receive an intervention dependent upon risk and resources available.

5.3 Food Standards and Food Hygiene Expectations

With the resources available (see section 6) and the actions detailed in section 4.2 we anticipate being able to deliver:

- a) Interventions of all due Hygiene A-C rated inspections, unrated inspections and the highest risk D rated inspections
- b) We anticipate that approximately 70% of our hygiene visits will also result in an appropriate Food Standards interventions.
- c) This proactive work will include appropriate revisits and proportional enforcement follow up including response to imported food concerns
- d) Reacting appropriately to complaints, alerts and incidents (including undertaking an intervention as required)
- e) Participation in at least 2 national or regional sampling programmes

These expectations are modelled on past performance and assume normal levels of absence and continuing development of the existing team.

5.4 Targeted Inspections of Feed Establishments 2023 - 2024

In line with National Priorities for Feed Law Enforcement, officers from the Investigation and Enforcement will undertake programmed inspections.

Table 5C – Feed Inspections		
Approval/Registration Activity Code	Premises Type	No of premises to be inspected
R1-R4	Premises manufacturing or placing on the market additives, premixtures etc. (not subject to approval) Manufacturers of compound feed (not subject to approval)	1
A1-8, R1-3, R5	Distributor	1
R4	Mobile mixer	0
R6	Pet food manufacturers	2
R7	Supplier of Feed Materials/Surplus Food	7
R8	Transporter	1
	Importer	
R9	Storage premises for feed/feed products	1
R10	Mixing feeds on farm, with additives and pre-mixtures	2
R11	Mixing feed on farm, with compound feeding stuffs which contain additives	
R12	Food businesses selling co-products of the food industry destined as feed materials	0
R13	Livestock farms (including fish farms) which do not mix feeds or mix feeds without additives	2
R14	Arable Farms	1

The desk top exercise to calculate the inspection programme for 2024-25 will commence towards the end of Q4 of 2023-24 and the service expects to receive confirmation of the agreed programme from National Trading Standards in early Q1 2024-25.

Sitting alongside the feed compliance work are the visits to farms under the animal health framework. As part of the programme of animal health and welfare inspections officers are also identifying feed premises and primary producers which has improved local intelligence of premises profiles across the borough. This in turn informs the planned inspection programme in these areas whilst ensuring the picture of our premises remains current.

5.5 Sampling

The Cheshire & Merseyside Sampling Sub-Group are yet to determine a food hygiene sampling programme.

At the time of writing the TSNW Executive is yet to agree on a food standards regional sampling programme for 2024/25. This will remain under constant review.

No feed sampling is scheduled under the National Sampling Priorities for the period 2022-2023. Sampling may however be carried out in the event of complaints relating to feed. However, samples will be taken in response to complaints and will be assessed on a case-by-case basis.

TSNW Feed and Agriculture Group has undertaken an audit of available sampling equipment within the region and is now working towards a shared resource of sampling resources available to local authorities across Northwest. Alongside this work authorised officers are undertaking refreshed training for agricultural sampling.

5.6 Demand Led Services

The service will continue to provide a reactive service for the following functions.

- Complaints and Service Requests
- Food Hygiene Rescore Requests
- Primary Authority
- Provision of Advice
- Food and Feed Safety Alerts

5.7 Promotional Work

The service will identify and implement any relevant promotion or education activities based on need and capacity.

'Natasha's Law' was introduced in October 2021 covering pre-packed food on site for direct sale. We worked with the Office of Product Safety and Standards to provide a free sub regional webinar.

6.0 Resources to support 2024-2025 Delivery.

6.1 Financial Allocation

Public Protection and Prevention provides a combined regulatory function within an overall operating budget of £1.9M, as of 2023/24.

FTE provision for official controls is detailed below in section 6.2. Responsibility is assigned across teams, but the staffing budget allocated directly to Business Compliance Team is circa £508,173 on 2023/24

The Council has committed to an ongoing investment of £208,000 back into official food controls since 2021/22.

6.2 Staffing Allocation

Current staffing allocations for each service area for the provision of food and feed work is estimated in the table below (accurate at July 24)

Table 6-A Staffing Allocation		
Service Area	Food (hygiene and standards) FTE Provision (Fully Staffed)	As a % of Total FTE
Business Compliance	*6.5 Food FTE [including 1.6 agency April- Nov 24]	58% of team including agency
Investigations and Enforcement	1.5 FTE	15%

*In addition to food and feed related work these officers will also be involved with the wider duties as required.

The percentage of their time allocated to these duties may vary during the year. Please note that we are taking steps to maximise the proportionate of time available for the delivery of official food controls in 2024-25, please see section 4.

Funding for agency staff beyond November 2024 is under review.

With the existing capacity it is forecast that the authority will continue to align with the Food Law Code of Practice as it endeavours to provide a robust and sustainable service where the existing development and support of officers is built upon.

As demand and capacity continue to fluctuate it will be necessary to regularly review the effectiveness of this delivery plan.

6.3 Staff Development

The FSA Codes of Practice for Food and Feed both require minimum levels of CPD to be undertaken annually by food and feed officers to maintain competence and retain where appropriate CTSI Practitioner status.

The FSA have introduced a new competency matrix to facilitate the assessment of competence for authorised.

We remain committed to staff development and to increase the full-time equivalent rate available for official food and standards work. All authorised officers currently have access to online training, are subscribed to a procedures database and, where appropriate, are given access to training provided by partner organisations such as UK Health Security Agency and Food Standards Agency.

6.4 Quality Assessment

In order to ensure that the service provided is in accordance with the FSA requirements, standard quality assessment procedures are undertaken. These include the reviewing of premises files including inspection reports post inspection, investigations of Service Requests and Complaints, the signing off of enforcement notices by managers prior to service and peer review inspection work. Officers are also assessed during accompanied visits to ensure a consistent approach is maintained.

Warrington Council participates in consistency exercises produced by the Food Standards Agency.

7 Performance monitoring.

7.1 Alterations of our Corporate Strategy 2022-24

Changes include the delivery of food hygiene and standards interventions in accordance with the Food Law Code of Practice (England).

Performance is monitored both within the Corporate and Departmental indicator set. We are further reviewing how these indicators can be improved, to better assessed performance against current capacity and wider challenges over delivery.

Governance arrangements are in place with weekly Divisional Management Team and monthly Cabinet Member briefings.

Regular 121s take place between the Head of Service and the service manager. Operational matters are discussed on a weekly basis or as required by the lead officers of the unit and during monthly team meetings. Discussions between managers and officers also occur during regular keeping in touch meetings.

Corporate complaints about the service are tracked corporately and reviewed at a Departmental level.

The service now also participates in the Council's Health and Wellbeing Board which further adds to transparency and accountability.

8.0 Consultation

This plan has been shared and with the Executive Director and Cabinet Member and subsequently agreed on 2nd September 2024.

The implementation of the plan will be monitored throughout the year before a new plan is produced for the financial year 2025/26.

