

Environmental Protection Service

Service Delivery Plan Annual Performance Review 2023/24

(Food Hygiene & Standards)



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1. What is the purpose of this report?

The purpose of this report is to:

- provide an overview of actual performance against performance targets for food hygiene and food standards as set out in the overarching SDP for Food, Safety, and Health 23/24.
- provide overview on progress made during 23/24 on alignment with Food Law Code of Practice.
- confirm actions that will need to be carried forward into the 24/25 SDP as well as identifying new themes that have emerged during the year that will also need to be included.

2. What did 23/24 performance look like?

a. Food Hygiene- Planned programmed inspections.

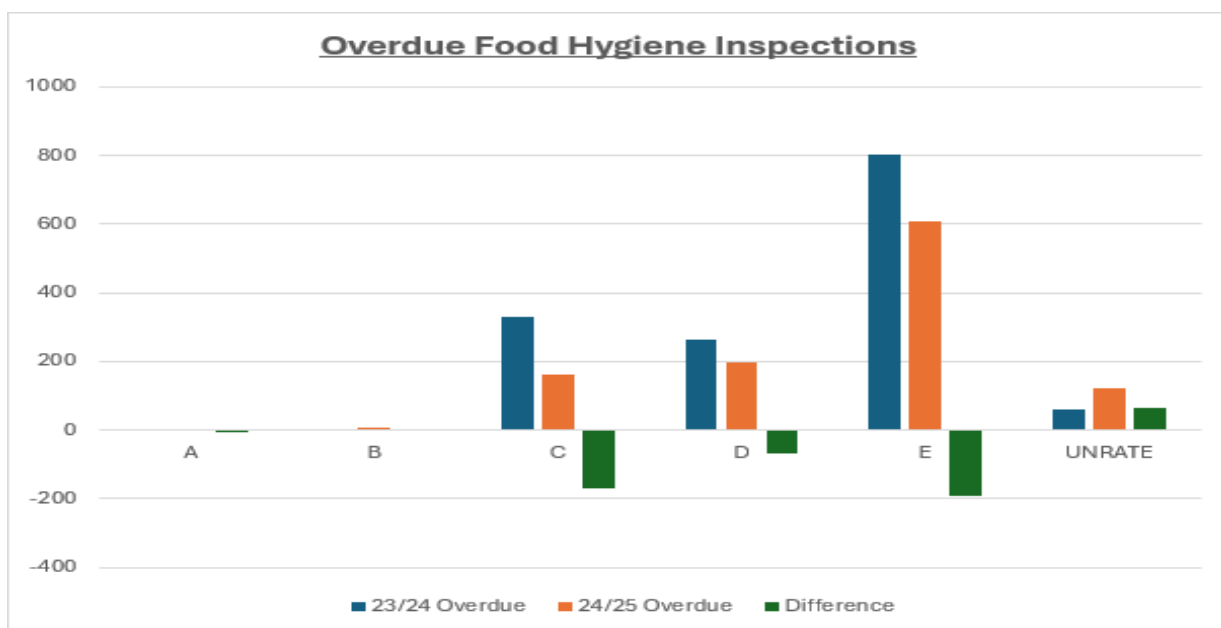
Category	Frequency	Planned	Delivered	% Programme Completed	
HIGH RISK	A	6 months	2	2	100%
	B	12 months	40	38	95%
	C	18 months	218	204	94%
	High Risk Total		260	244	94%
LOW RISK	D	2 Years	45	32	71%
	E	3 Years	45	9	20%
	Low risk total		90	41	46%
UNRATED	UNRATED (at 1st April 2023)		28	26	93%
	New Businesses		262	163	62%
	Total unrated		28	26	93%

Explanation

- Delivery against high-risk premises is above 90% for all categories.
- All outstanding high-risk inspections have been prioritised for inspection in 2024/25.
- New premises during the year continue to be addressed as a priority.
- We have adopted a priority risk-based approach, utilising Food Hygiene Rating System (FHRS), for overdue compliant category Cs.
- Alternate verification visits have been introduced for Category C and D premises which will gather pace as more premises align with the code.
- Alternative Enforcement Strategies (AES) are now being utilised for low risk non catering category D premises and category E premises.

b. Targeted interventions to businesses pending realignment with the Code of Practice.

Category	Frequency	Planned	Delivered	% programme completed	
HIGH RISK	A	6 months	1	1	100%
	B	12 months	4	3	100%
	C	18 months	332	188	56%
	High Risk Total		337	192	57%
LOW RISK	D	2 Years	264	83	31%
	E	3 Years	801	204	25%
	Low risk total		1,065	287	27%
NEW BUSINESSES	UNRATED (at 1st April 2023)		60	47	69%
	Total unrated		60	47	69%



Explanation

- Effective progress continues to be made in realigning category C premises with the code as demonstrated in the graph below.
- All premises pending realignment with the code (155 premises) have previously been assessed as broadly compliant.

c. Food Standards- Planned programme inspections

Category	Frequency	Planned	Delivered	% programme completed
A	12 months	6	6	100%
B	24 months	111	99	89%
C	60 months	98	63	64%
UNRATED		24	22	92%
All Categories Total		239	190	79%

Explanation

- New premises continue to be addressed as a priority.
- Alternate Verification visits were introduced for Category B premises in the last 6 months of 23/24 and will gather pace as more premises gradually align with the code.
- AES are now being utilised for category C premises.

d. Targeted interventions to businesses pending realignment with the Code of Practice and transitioning to the risk assessment under the code.

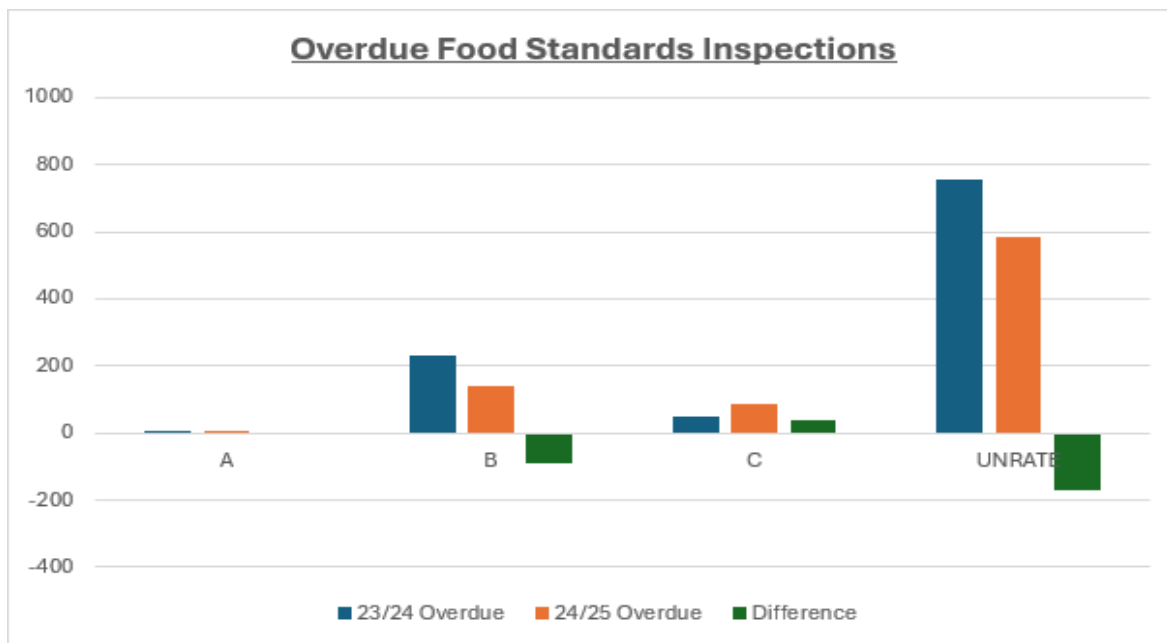
Category	Frequency	Planned	Delivered	% remaining
A	12 months	1	1	100%
B	24 months	232	114	49%
C	60 months	49	21	43%
UNRATED		754	188	25%
All Categories Total		1036	324	31%

Explanation

- Efforts are being maintained in re-aligning all high-risk premises with the code.
- Verification visits are proactively being utilised for both hygiene and standards interventions where permitted.
- Low risk premises are being subject to alternative enforcement strategies.
- Note that the figures submitted as part of the mid-year temperature check did not account for businesses pending alignment with the code. This aspect was revised for the end of year submission which is reflected in the end of year totals.

Observations

- Hygiene and standards visits continue to be combined (where possible) during transitioning of risk ratings to the requirements of the code.



Explanation

Un-rates consist of premises awaiting risk rating in accordance with the Code.

e. Re-visits

		Revisits 2022/23	Estimated revisits 23/24	Revisits carried out during 23/24
Food Hygiene	Rescore Visits	8	10	21
	Revisits	21	20	27
Food Standards	Revisits	1	5	1
Total revisit interventions		30	35	49

Explanation

- Paid rescore visits has increased by over 50%.
- General revisits have also increased.
- In the absence of formal interventions this supports a gradual decline in overall standards

f. Complaints and Service requests

Complaints		Total received			
		2020/21	2021/22	2022/23	2023/24
Food Safety	Service requests, complaints, and advice.	1,145	881	1,166	1,443
Food Standards	Service requests, complaints, and advice	42	30	40	48
Feed Service	Service requests, complaints, and advice	37	22	18	13
Total received		1,224	933	1,224	1,504

Service requests and response 2023/24				
Total received	Target response time	Average actual response	Number responded to within target	% of responses within target
1504	10 Days	2 Days	1309	87%

Explanation
<ul style="list-style-type: none"> • The service maintains an active and effective presence in responding to all service requests taking account of all potential public health risks. • Response to service requests is excellent. • Service demands continue to increase annually.

g. Planned vs Actual Resource during 23/24

		Food Hygiene/ Standards		Communicable disease		Health and Safety incl. Special Procedures		Feed	
		Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual
Review of Resources during 2023/24 period	Manager (vacant)	0.1	0	0.1	0	0.1	0	0.1	0
	Lead Officer	0.5	0.5	0.1	0.1	0.2	0.2	0.2	0.2
	EHPs	8.2	4.7	0.8	1.5	1	1.8	0.2	0.2
	Food Officers	0.2	0.2	0	0	0	0	1.7	1.6
	Business Support	0	0.3	0	0.2	0	0	0	0
	Total	9*	5.7	1	1.8	1.3	2	2.2	2
	Vacant	0.5	1	0	0	0	0	0	0

*0.2 transferred from Food Officers to undertake sampling.

Explanation

- Replacement recruitment was ineffective due to market availability.
- Contractor availability remained scarce and at a premium resource.
- Alternative methods of delivery were deployed where possible to release staff resources.
- Designated support resource was appointed to assist in an administrative capacity.

h. Sampling

	Proposed 2023/24 Sampling programme	Samples collected
Microbiological sampling (Total)	96	186
(Burry Inlet and Three Rivers Shellfish flesh) (E.coli)	84	84
Burry Inlet water sampling (Biotoxin)	12	12
General (Microbiological food and/or swab samples)		90
Food standards	20 <i>(pending FSA funding)</i>	0
Feed	5 <i>(pending FSA funding)</i>	5

Explanation

- Sampling was not prioritised during the process of realigning with the code.
- Shellfish sampling was maintained due to its legal status and the need to continually monitor classified sites for an active trade.
- Officers were encouraged to actively sample manufacturing locations where possible as a means of verification and surveillance These are not specifically targeted.
- A large proportion of samples captured above were taken in response to a localised incident.
- Standards based sampling currently mirrors those of financed national priorities.
- Feed samples were targeted locally in light of the inclement weather experienced and the direct risks associated with heavy rain.

i. Other key actions proposed in 23/24 Service Delivery Plan

Action	Rationale	Proposed completion	Completed (Y/N)	Comments
Introduction of weekly performance monitoring of food inspections.	To better understand trends and performance.	Immediate	Y	Weekly performance revised to quarterly to effectively capture qualitative and quantitative information to suitably inform strategic address, enabling longer term appraisal as opposed to short term metrics across full spectrum of service delivery.
Risk analysis of current demands across the team.	To further prioritise existing workloads.	Mid-March 2023	Partial	Alternative methods of delivery explored and introduced. Enhancements made in e-engagement facilities, with further improvements to be made with management information system procurement.
Development of overarching Service Development Plan for 2023/24, taking account of new delivery models and outcome Environmental Protection review	<p>New plan that takes account of new models of working being developed. This will consider:</p> <ul style="list-style-type: none"> • Combined risk-based assessment for food hygiene and standards, with greater focus on higher risk establishments; • Online business registration to inform risk-based approach to new business; • Development a robust triage system for complaints with the ability to note and report rather than investigate; • Consideration of a paid advisory service to delay official controls being implemented; • Introduction of “Carmarthenshire Long Term Compliance award” to promote good practice (possible link with “Buy with Confidence” scheme); • Limit E category premises to a single intervention; and <p>Use economic development initiatives to promote food industry in County.</p>	End of March 2023	Partial	<p>Introduction of new All - Wales models of delivery placed on hold. In the absence of such advancement SDP assembled based on continued code alignment expectations.</p> <p>Additional progress includes:</p> <ul style="list-style-type: none"> - Continued alignment of hygiene and standards interventions where possible - Introduction of Online business registration facility at local level with enhanced data capture to enable sufficient triage due to current MIS incompatibility with RAFB - Reintroduction of AES with a view to limit low risk inspections to a single initial physical intervention (not withstanding continued local surveillance) - Partnership engagement with economic development with effective signposting coupled with active information sharing of current incentive schemes <p>Limited progress made in respect of:</p> <ul style="list-style-type: none"> - Robust triage system in relation to complaints - Reintroduction of paid for advice (capacity)
Development of 2023/24 inspection programme	Need to confirm programme of hygiene, standards and unrated businesses for 23/24.	End of March 2023	Y	Complete inspection programme assembled and allocated, inclusive of premises qualifying for alternative interventions or alternative strategies.
Confirm timescales for implementation of new IT system.	<ul style="list-style-type: none"> • To create more capacity within system by allowing on-site input of information; • To allow more on-line interaction and self-service for businesses; and • To modernise current working practices and deliver new models of inspections, to align with review recommendations. 	End of March 2023	Partial	<p>Invest of nearly 100k for 24/25 confirmed for new IT system.</p> <p>Procurement to begin Autumn 2024</p>

j. **Programmed Feed inspections for 2023/24**

Activity	Profile of feed premises on April 2023	Programmed inspections 2023/24 pending regional MOU	Delivered inspections during 2023/24
Manufacturer (R01-04)	8	4	3
Co Product Producer (R12)	11	2	3
Mobile Mixer (R04)		0	0
Importer	0	0	0
Stores (R09)	0	2	0
Distributor (R05)	3	9	4
Transporter (R08)	20	1	0
On farm mixer (R10)	3	0	1
On farm mixer (R11)	10	12	23
Pet food manufacturer (R06)	116	5	3
Supplier of feed materials (R07)	6	0	2
Total	5	35	39
Livestock farms (R13)	182	247	186
Arable farms (R14)	2686	0	0
Total:	0	282	186

Explanation

- Defined Inspection programme financed and governed regionally.
- Application of assured scheme model continues to gradually reduce the number of premises scheduled for inspection, thus having a detrimental impact on the derived income from this service.
- Pending trainee success, FTE equivalency will be reduced in this area and utilised primarily in the food service.

k. **Export Health Certificate attestations provided in comparison to 2023/24 estimation**

	Estimated EHC/Attestations 2023/24	EHC/attestations provided 2023/24
TOTAL:	40	12

Explanation

- Demand on certification remains primarily a seasonal activity.
- Unexpected downturn in demand witnessed during 23/24, potentially influenced by export market from the UK.
- Capacity to be maintained due to nature of demand on service.
- Cost recovery to be factored in to localised fee.

I. Food incidents dealt with during 2023/24

- 2x Investigation Stage actioned for high e-coli levels on a shellfish bed resulting in a revised classification status;
- 2x Listeria cases linked to a presence detected in a local manufacturer
- Alleged Smokie Production
- Large deposit of Animal By Products in a remote location
- GI Outbreaks in Care home
- Unlicensed on farm slaughter

Explanation
<ul style="list-style-type: none"> • Service provision must be maintained for any identified system failures or apparent contraventions. • Investigations are often time consuming; resource heavy and relative to issues of significant public health concern. • Fortunately, only one of the incidents above demanded significant additional resource.

m. Outbreak and food related infectious diseases

Notification Type	2022/23	2023/24
Campylobacter	236	271
Salmonella	27	20
E Coli	41	30
Cryptosporidium	24	48
Giardiasis	16	23
Other Food Poisoning	8	12
Norovirus / Rotavirus	111 (Norwalk Virus)	90
Hepatitis	6	10
Lymes Disease	0	0
Clostridium	17	0
Listeria	0	0
Shigella	4	7
Legionnaire's Disease	2	5
Typhoid Fever	0	1
TOTAL:	492	517

Explanation
<ul style="list-style-type: none"> • There is a slight increase in the number of food related infectious diseases reported. • National surveillance measures supplement routine investigations with comprehensive enhance surveillance data requirements delivered by the service. • A level of preparedness must be maintained for outbreak or incident declaration. • The Council participated in 4 IMT during the course of 23/24.

n. Proactive Health and Safety Work

Proactive work	Activity detail	Target number	Number of interventions delivered
Safety at sports grounds	Lead the Council's Safety Advisory Group in accordance with the Safety at Sports Grounds legislation	3 *These will be a priority as the sportsgrounds, whilst being monitored have not undergone regulated inspections, due to capacity issues	0 - Formal interventions
Gas safety	Raise awareness, with their local duty holders, of the risks of exposure to carbon monoxide in commercial kitchens from badly installed or faulty appliances; poor ventilation resulting in lack of make - up air to support combustion; and/or inadequate extraction systems.	10	2 Formal Interventions
Drink Storage Safety in Public Premises	The raising of awareness and the assessment of compliance within catering establishments where there are typical restricted access storage rooms for the dispensing of beverages.	20	1 Fornal Interventions

Explanation
<ul style="list-style-type: none"> • Topic based interventions were delivered in response to complaints; direct reports; service requests or as part of a hazard spotting approach during the undertaking of official food activities. • No formal interventions were delivered at licensed sports grounds.

o. RIDDOR reports and number of incidents investigated further.

Number of RIDDOR reports received 2022/23	Number meeting incident selection criteria 2022/23	Number of RIDDOR reports received 2023/24	Number of reports investigated.
99	3	103	3

Explanation
<ul style="list-style-type: none"> • The capture of RIDDOR reports is in the process of being transferred to Business Support. • Incident selection criteria is applied to all incidents captured locally. • More work is needed on trend analysis.

3. What actions need to be carried forward into 24/25 SDP?

- Continue to work in line with the current method of prioritisation to aid and increase pace of alignment with the code of practice, including the use of alternating verification visits for Food Hygiene and Standards where possible, and Alternative Intervention Strategies for low-risk premises.
- Maintain regular review of performance to identify trends, challenges, and areas for improvement to improve efficiency, and increase scale and pace of delivery.
- Explore potential income streams within the Food, Safety and Health Team to aid service delivery and scope of the service e.g. paid for commercial advice service.
- Review current processes relating to new business registrations and explore improvements to the administration of these registrations by e.g. use of online registration system administered by Business Support colleagues.
- To explore how Business Support Services can assist the Food, Safety and Health Team, alongside the training required to aid the accurate administration and processing of Alternative Enforcement Strategy interventions.
- Consider the best use of resource deployment to release staff resources e.g., the complaint response time far exceeds the required target response, and the use of a robust triage system will allow better use of resources.
- Continue to conduct targeted sampling as a supplementary function to verification and alternative intervention regime in addition to statutory sampling work.
- Increase the Food, Safety and Health Team's use of online presence to enhance service delivery.
- Pursue the procurement of a replacement Management Information System and ensure its robust introduction and implementation. Robust training and ongoing support will be fundamental to the success of this new system to ensure consistency amongst Officers and its correct use.
- Continue to delegate data cleansing exercises on the current Management Information System to Business Support Services with an aim to ensure an accurate reflection of trading businesses.

4. What new themes have been identified to consider as part of 24/25 SDP planning?

Ways of working

- Explore areas that Business Support Services can assist the Team.
- Review current complaint triage system to ensure the most efficient deployment of staff resources.
- Actively seek to recruit to vacant posts.

Better use of technology

- Maximise and further explore the use of online functions.
- Pursue the procurement of a new Management Information System and training.
- Implement more smart technology to aid the delivery of Official Food Controls.