

Cyngor Gwynedd
Public Protection Service Delivery Plan 2024-25
Food Safety: Hygiene and Standards

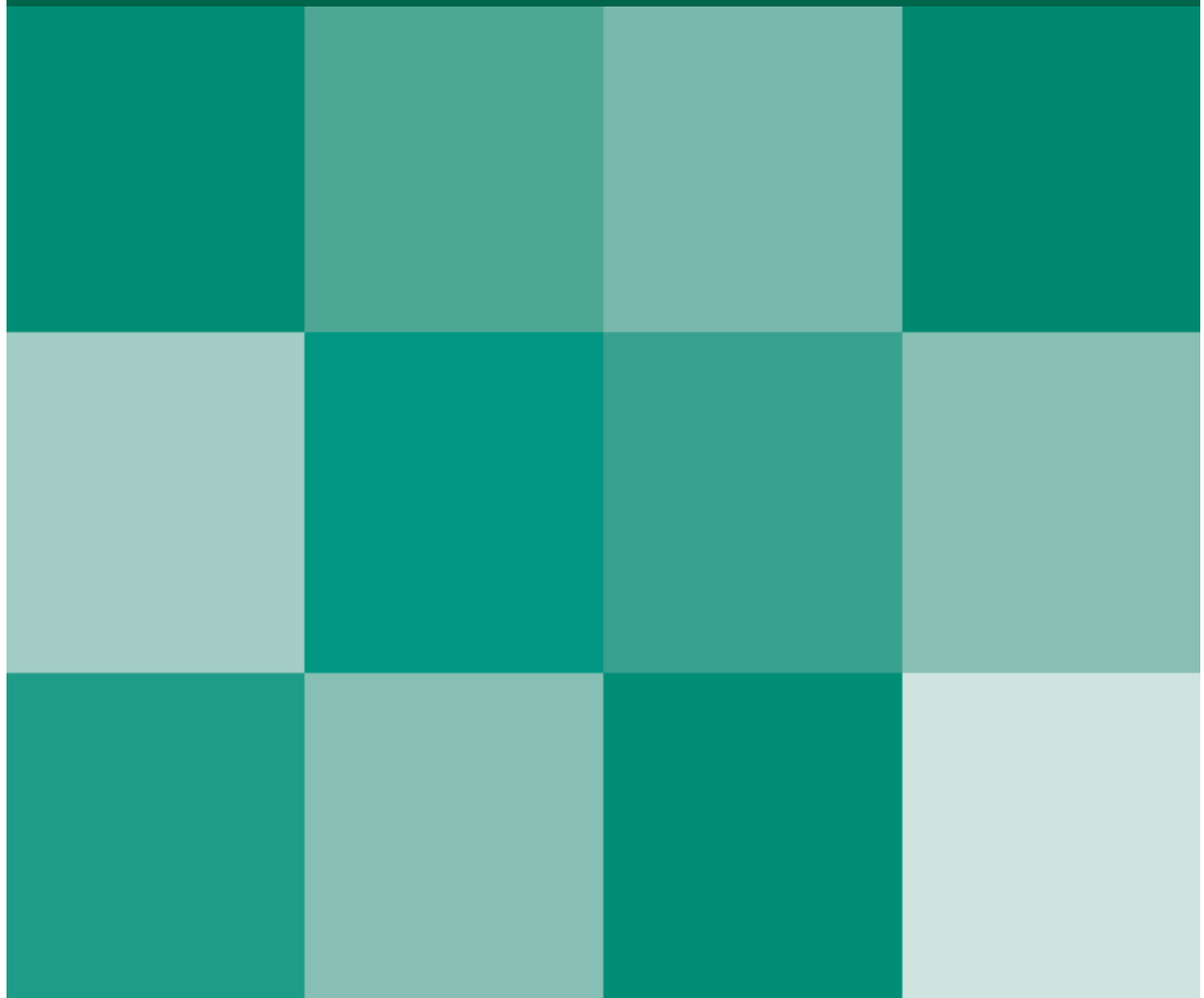

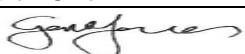


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Document Control

Name	Food Safety: Hygiene and Standards Service Plan
Version	Final
Status	Live
Lead officer	Alun Evans, Public Protection Manager
Signature	
Produced by	Public Protection Service
Approved by	Gareth Jones
Designation	Assistant Head of Environment Department
Signed	
Approved date	10/5/24
Next review date	1/04/25

1.0 Introduction

The Food Standards Agency (FSA), as part of its national food safety framework agreement, requires all local authorities to prepare an annual food service delivery plan.

The plan should reflect the work required of food authorities by the FSA, under the requirements of the Food Standards Act 1999 and the framework agreement on local authority enforcement.

This service delivery plan details Cyngor Gwynedd's approach to service delivery during 2024-25.

2.0 Service Objectives

2.1 Aim

The Public Protection Service is committed to ensuring that food and drink intended for sale for human consumption, which is produced, stored, distributed, handled or consumed within the County is without risk to the health and safety of the consumer and conforms to composition and labelling requirements.

The Service will adopt an approach to enforcement based upon an assessment of the risk to public health and a failure to meet statutory requirements.

The Public Protection Service has an Enforcement Policy and staff will carry out the activities listed in this Service Plan in accordance with the policy.

Regard will be made to guidance issued by the Food Standards Authority (FSA) and to guidance from other recognised bodies.

The Service will also contribute towards the Council's efforts in fulfilling its obligations under the Well-being of Future Generations (Wales) Act 2015.

2.2 Objectives

The objectives of the Public Protection Service in relation to food safety are as follows:

- To carry out an annual food hygiene and food standards inspection programme in accordance with statutory requirements, the Food Law Code of Practice (Wales) and relevant guidance. Where possible such interventions will be undertaken coincidentally with interventions undertaken in respect of other statutory functions.
- Support the annual inspection programmes with other interventions such as audits, alternative enforcement and food sampling; where necessary and appropriate to do so.
- Investigate complaints and to take appropriate action in accordance with the Food Law Code of Practice (Wales) and other relevant guidance.
- To provide information and advice to businesses and consumers. Where resources allow, support food businesses and consumers with targeted promotional advice and educational initiatives.
- Raise awareness of food safety issues to allow consumers to make informed choices about where they buy their food from.

- Ensure that food regulation is consistent and proportionate.

2.3 Links to Corporate Objectives

The Cyngor Gwynedd Plan for 2023 -28 contains priority fields which are the Authorities well-being objectives under the Well Being of Future Generations (Wales) Act.

The plan explains that the five ways of working stipulated in the Act will be followed in terms of considering long-term effects, prevention, integrated working, collaborative working and the involvement of people of all ages in decision making processes. This will be achieved by putting the people of Gwynedd at the heart of everything we do.

The Council’s plan lists seven priority fields which are to be the focus of our efforts over the next 5 years.

The following table details the links between the work of the service and some of the priority fields

Priority Field	The Priority	Link to Service’s work
A Caring Gwynedd	Supporting the residents of Gwynedd to live full and safe lives in our communities.	<p>Officers undertake interventions including inspections and the provision of advice at food businesses throughout the county. The interventions ensure compliance with food hygiene and standards legislation. This in turn ensures that the food produced, sold and consumed within Gwynedd is safe to eat.</p> <p>Businesses are actively encouraged to improve their standards, thereby contributing towards an improvement in conditions for residents and visitors alike.</p> <p>We raise awareness of food allergies and food intolerances and emphasise how and which products/ingredients affect certain vulnerable groups in our society.</p>

<p>A Prosperous Gwynedd</p>	<p>Strengthening the economy and supporting the people of Gwynedd to earn a decent salary.</p>	<p>By undertaking food safety work the service aims to ensure that food businesses within Gwynedd do not cause instances of food poisoning. Food poisoning outbreaks can result in a substantial negative economic impact by:</p> <ul style="list-style-type: none"> -Sufferers not being able to work and seeking medical treatment. -Businesses associated with the outbreak losing their 'good name' and customers. -Negative publicity impacting on visitor numbers to the area. <p>In securing compliance with legislative requirements the service works with bona fide businesses while taking firm action against those that choose not to comply.</p> <p>Advice and assistance is provided to businesses with the objective of ensuring that they satisfy the needs of their customers, provide employment locally and generate adequate returns for their investors.</p> <p>Monitoring and advising on regulatory standards helps to maintain a fair and sustainable economy.</p>
<p>A Welsh Gwynedd</p>	<p>Ensuring that we give our residents every possible opportunity to use the Welsh language in the community.</p>	<p>All front-line services are delivered / available through the medium of Welsh.</p> <p>The service's work in promoting good business practice / compliance using the Welsh language contributes towards a natural Welsh society.</p>

2.4 Performance Monitoring Measures.

The food safety performance indicators for 2024-25 are listed below. The performance indicators are used, in part, to measure the service's contribution towards meeting the Cyngor Gwynedd priorities. The Service's performance in terms of meeting these targets is subject to scrutiny by a panel every two months or so. The panel comprises of chief officers and councillors.

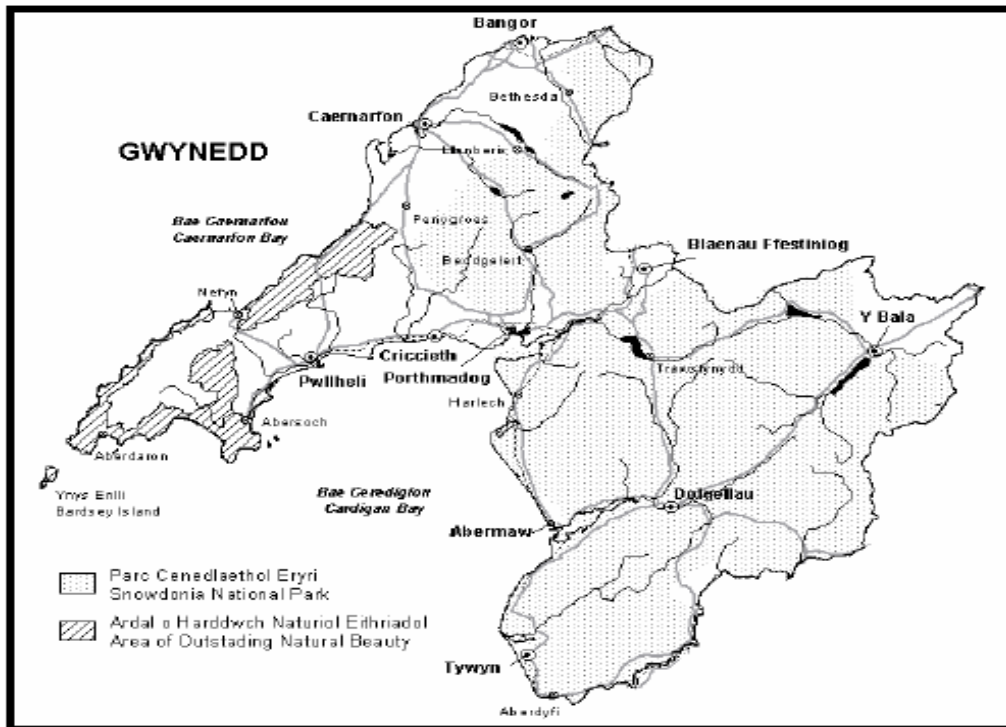
Performance Indicator Reference	Description
B & D1	% of food establishments that meet Food Hygiene Standards (equivalent to a food hygiene rating of 3 or above)
B & D 2 (A)	% of food establishments which received a food hygiene inspection in accordance with the food hygiene inspection programme over a given period.
B & D 2 (B)	% of food establishments which received a food standards inspection in accordance with the food standards inspection programme over a given period.

3.0 Background

3.1 Profile of Gwynedd

Gwynedd is located in North West Wales. It is the second largest County in Wales, accounting for 12.26% of the total land area, covering an area of 2,548 square kilometres. Gwynedd extends from Abergwyngregyn in the north to Aberdyfi in the south, a road distance of 130 Kilometres, and from Uwchmynydd in the west to Llandderfel in the east; a road distance of 103km. At 301 kilometres, Gwynedd has the longest coastline of all Unitary Authorities in Wales.

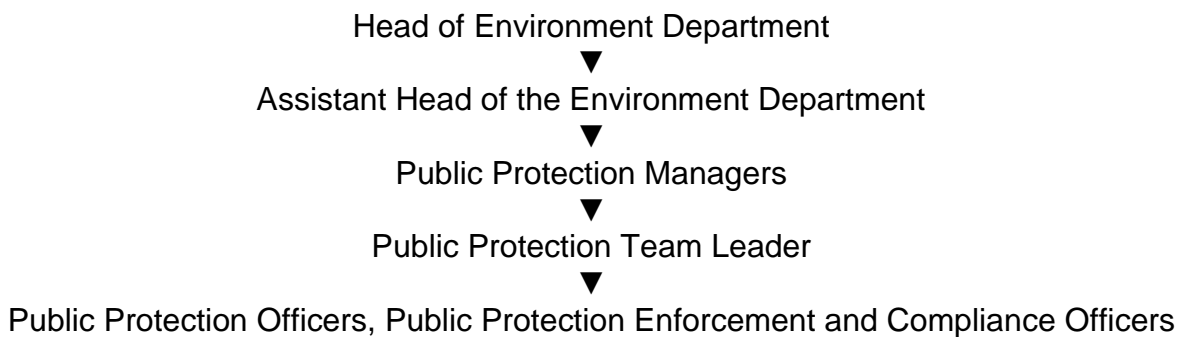
Gwynedd's population in 2021 (Census) was 117,400. The majority of the urban population is concentrated in the north of the County, in Bangor, Caernarfon and the surrounding towns and villages.



3.2 Organisational Structure and Reporting lines

The Public Protection Food and Safety Service which will deliver the work detailed in this plan. The Cabinet Member for The Environment Department has responsibility for Public Protection matters. The Communities Scrutiny Committee is responsible for scrutinizing both his / her decisions and the delivery of the service by the Department.

The Public Protection service management hierarchy is detailed below:



3.3 Scope of the Food & Safety Service work

The service contributes towards and maintains:

- Establishing and maintaining an up-to-date register of all food premises within the County.
- Planned Interventions of Food Premises –The frequency of intervention at each food business is programmed according to the food establishment intervention rating scheme as prescribed in the Food Law Code of Practice (Wales). Officers advise on good practice and ensure compliance with legal requirements. Due food standards interventions are undertaken, where possible, jointly with programmed hygiene interventions.
- Revisits – Where the operator of a food business is required to undertake works in order to comply with food safety /standards legislation, a revisit may be undertaken after the date specified for compliance.
- Investigation of Complaints – The service responds to all complaints about food businesses and food purchased within the area of Cyngor Gwynedd that are not anonymous. Each complaint is investigated to determine appropriate enforcement action and to ensure precautions are taken to prevent a recurrence. This often involves contacting manufacturing companies and other local authorities / home authorities / primary authorities.
- Identifying new food businesses early in the life of those businesses and visiting those premises to undertake interventions and provide advice and guidance.
- Investigation of Food Borne Illnesses – Notification of cases of food poisoning are received from general practitioners, Public Health Wales (PHW) and their laboratory services. Each notification is investigated and appropriate action taken to prevent the spread of infection.
- Food Hygiene / Standards Promotion and Education – As part of the service's commitment to promoting public health various food safety initiatives are undertaken. Previously these have included seminars to local businesses, involvement in the FSA's food safety week, the provision of newsletters and providing advice and assistance to businesses during programmed interventions and on request.
- Food Alerts and Incidents –When food alerts are issued by the FSA in respect of certain foodstuffs and where necessary the food and safety service takes all appropriate measures to ensure foods are withdrawn from sale within the County. The Service may also log a food incident via the FSA where it has concerns about actual

or suspected threats to the safety or quality of food that could require a national intervention to protect consumers' interests

- Food Establishment Approvals – Certain food operations require prior approval by the local authority. In Gwynedd these include operations involving dairy products, meat products, fish products and egg packers. Establishments are inspected prior to issuing approvals and are regularly monitored thereafter to ensure continued compliance with legal requirements.
- Food Sampling – Sampling is undertaken to monitor food safety and standards compliance during interventions and as part of national, regional and local sampling programmes.
- Shellfish Sampling - Sampling is undertaken to monitor the hygiene status of designated shellfish production areas.
- Imported Food – Investigating allegations or circumstances which indicate that imported food might be contaminated, adulterated, or illegally imported, taking action to deal with any issues.
- Mineral / spring water – One bottling plant is currently overseen by the service. Interventions are carried out on a regular basis to ensure that the water is fit for human consumption and the information provided to consumers complies with current legislation.
- Other Services –Officers with established competencies may be required to address both occupational health and safety and food standards matters arising during the course of food safety interventions. They also, where necessary, investigate water borne incidents and infectious disease other than food poisoning, comment on applications for premises licences under the Licensing Act 2003 and on planning and building control applications relating to food premises.

3.4 Specialist External Services/Partners

Public Analyst	Public Analyst Scientific Services Ltd
Food Examiner	Public Health Wales Microbiology, Ysbyty Gwynedd
Proper Officers	Public Health Wales

3.5 Location of Services

The service is delivered from three area offices which are Pencadlys, Caernarfon; Swyddfa Ardal Dwyfor, Pwllheli and Swyddfa Ardal Meirionnydd, Dolgellau. The offices re open to the public Monday to Friday 09:00 – 16:00.

Out of hours interventions are carried out where premises do not trade during the daytime. It is the policy for food interventions, unless in exceptional circumstances, to be carried out unannounced to allow the actual business operations to be observed.

3.6 Demands on the Food and Safety Service

Gwynedd food businesses include manufacturers, processors, wholesalers, retailers and catering establishments. Catering and retail are the dominant sectors. The businesses are predominantly small to medium sized enterprises (SME).

On the 1st April 2024 Gwynedd Council was responsible for enforcing food safety in over 2100 food premises within the county.

The risk assessment programme for food safety and standards is set out in the Food Law Code of Practice (Wales) intervention rating scheme and the criteria provides that all food premises should be subject to a degree of surveillance. The method of surveillance that may be applied varies in accordance with the risk rating of the business; alternative enforcement methods may be used for the lowest risk premises.

Table showing number of Gwynedd food businesses per main classifications

	Number of premises (As at 01/04/24)
Primary Producers (Food – produce / catch – not livestock)	54
Manufacturers and Packers	178
Importers and Exporters	1
Distributors and Transporters	12
Retailers	351
Restaurants, Cafes, Canteens, Caterers	605
Hotels, Guest Houses,	195
Pubs and Clubs	147
Takeaways	139
Caring Premises	142
Supermarkets	55
Schools /Colleges	127
Mobile Food Units	95
Total	2101

Gwynedd has 30 Approved food Establishments based within the County.

Gwynedd has a number of classified shellfish beds which are subject to regulation. The Authority is responsible for processing samples of shellfish and water in the locality of beds to ensure that they meet strict microbial and chemical quality standards. The officers involved require specialist training.

Similarly, the enforcement of food safety regulations within the water bottling require officers to receive specialist training.

Approximately 250 food premises are open on a seasonal basis within the County. Such businesses are predominately open during the summer months. This places an added burden on the service during the Summer due to the increase in scheduled inspections, coupled with an increase in complaints and requests for service due to the general temporary increase in the population locally from tourism.

3.7 Enforcement Policy

The public protection enforcement policy was approved by Committee. Enforcement decisions will be documented and monitored to demonstrate adherence with the policy. In

addition to this there are comprehensive procedures available to ensure consistency of service.

4.0 Service Delivery

4.1 Food Premises Interventions

Interventions at food premises are usually prioritised in accordance with the premises risk rating as previously established, as stipulated in the Food Law Code of Practice (Wales).

Interventions are activities that are designed to monitor, support and increase food law compliance within a food establishment, they include, but are not restricted to, 'official controls' as described in Assimilated Regulation EC 2017/625.

Official control interventions that may be used include inspections, partial inspections, audits, surveillance visits, verification visits, monitoring visits and sampling visits where sampled products will be subject to analysis/examination at an official laboratory. Where circumstances allow and in particular for low - risk premises, other interventions that are not official controls may be used. These include education, advice, coaching and information gathering.

The Food Law Code of Practice (Wales) details the minimum intervention frequencies for specific categories of premises and the type of interventions which may be appropriate, which are as follows:

Food Hygiene minimum intervention frequencies

Risk Category	OFFICIAL CONTROLS							OTHER INTERVENTIONS		Minimum Frequency of Intervention
	Inspection	Partial Inspection	Audit	Monitoring	Surveillance	Verification	Sampling	Education, Advice and Coaching	Information, Intelligence Gathering and Sampling	
A ²	X	X	X							6 months
B ²	X	X	X							12 months
C ²	X	X	X							18 months
C: Broadly Compliant ¹	X	X	X	X	X	X	X			18 months
D	X	X	X	X	X	X	X	X	X	24 months
E	All official controls and / or Alternative Enforcement Strategy Every 3 years									

¹ - Premises which are able to demonstrate, and have been assessed as, having good conditions, systems and management which score ≤ 10 in the rating system (i.e. good premises).

² - For Food standards, the minimum intervention frequencies for category A premises is 12 months, category B 24 months and category C premises should be subject to an alternative enforcement strategy or intervention every five years.

4.2 Hygiene Interventions at Primary Producers.

The Food Law Code of Practice (Wales) details a risk based approach to undertaking interventions at primary food producers.

Local Authorities are required to make the best possible use of the evidence available when determining intervention frequencies at primary producers (production, rearing or growing products including harvesting, milking and farmed animals production prior to slaughter. It also includes hunting, fishing and harvesting of wild products). Subject to various caveat's fishing vessels interventions should be planned in accordance with the code of practice and associated times scales.

Any intervention undertaken will seek to establish that the food business operator and any employees have an understanding of the hazards posed by the business and whether or not adequate measures are in place to control the hazards and ensure that food entering the food chain is safe to eat.

4.3 The National Food Hygiene Rating Scheme (FHRS)

The Food Hygiene Rating (Wales) Act 2013 requires local authorities to operate a food hygiene rating scheme and rate food businesses within their area. Also, the Act places a duty on food businesses to display their food hygiene rating at their establishment. The intention of the Act is to ensure that consumers are provided with information about the food hygiene standards of food businesses in Wales. This will enable consumers to make better informed choices about where to buy food.

Ratings are listed on the Food Standards Agency website <http://ratings.food.gov.uk/> .

The Food Hygiene Rating Guidance for Local Authorities (issued by the Food Standards Agency) advises that a food hygiene rating may only be given following an inspection.

4.4 Cyngor Gwynedd Food Hygiene Intervention Programme 2024-25

Due to a lack of resources (in terms of qualified, authorised officers) for 2024-25 it is unlikely that Cyngor Gwynedd will be able to fully comply with the minimum food premises inspection frequencies stipulated in the Food Law Code of Practice (Wales) (CoP) .(See part 5.2)

In accordance with the Code the number of hygiene interventions due for 2024-25 is estimated as:

Premise Profile	Number of Premises (at 1/04/24)	Estimated number of interventions required during the year to 31/3/25
Category A	1	1
Category B	46	46
Category C	672	424
Category D	559	290
Category E	753	198
Unrated	60	60
Outside programme	10	10
TOTAL	2101	1029

We will focus our available resources on undertaking food hygiene inspections at specific premises including:

Premises which are overdue an intervention

Risk category A premises

New Businesses

Approved Establishments.

Premises where we have received complaints in relation to hygiene practices / cleanliness or associated with a food incident or communicable disease outbreak.

Upon completion of interventions at these premises the food and safety service will revert to the food law code of practice minimum intervention programme in line with a business's risk rating / last inspection.

We will also attempt to undertake timely interventions at seasonal premises where possible to do so.

4.5 Cyngor Gwynedd Standards Intervention Programme 2024-25

For 2024-25 every high-risk category A premises due or overdue an inspection will be subjected to an intervention.

Officers undertaking food hygiene interventions also undertake food standards interventions at the same time, if due in the same year or overdue.

Food standards inspections will therefore follow the same arrangements as the hygiene inspections over the year.

The driver for food standards interventions at category B and C risk businesses will be the hygiene interventions programme.

The table below details the food standards interventions due during 2024-25.

Premise Profile: Food Standards (Risk Categories A-C)	Estimated Number of Premises (As of 1/4/24)	Estimated number of inspections / interventions required during the year to 1/4/25
Category A	8	8
Category B	661	344
Category C	1371	250
Outside Programme	1	0
Unrated	62	62
TOTAL	2103	664

4.6 Gwynedd Council Primary Producers Intervention Programme 2024-25

Interventions at primary producers will be prioritised using local intelligence and evidence. One Factor to be taken into account is membership of recognised assurance schemes.

Inspections of primary producers are generally carried out in conjunction with animal feed inspections which are scheduled in accordance with the Priority Action Plan submitted annually to the Welsh Government. The Feed action plan involves all North Wales Authorities.

Only a small proportion of primary producers receive a hygiene inspection year on year.

4.7 Enforcement Revisits

There is an expectation that any premise that receives a food hygiene rating of 2 or less will receive an enforcement revisit because this is deemed to be a breach of food hygiene law.

The timing of the revisit will be determined by the nature of the contraventions identified previously and the actions required of the business to deal with them. It is expected that a revisit of a premise with a hygiene rating of 0 will be undertaken within 28 days. Where there is a major concern with regards to the cleanliness of the premise a shorter time may be more appropriate. Premises with a rating of 1 or 2 should be revisited within a 3 month period. Such a revisit should, whenever practicable, be undertaken by the officer who undertook the original intervention.

There is also an expectation where a significant breach is identified under food standards legislation that a revisit will occur. The timescale will depend on the risks associated with the breach but should be undertaken within a 3 month period.

The table below details the number of food hygiene and food standards revisits undertaken by officers in previous years including last year.

Re-visits

Year	Food Hygiene	Food Standards
2021 -22	3	4
2022 -23	34	18
2023 -24	39	9

4.8 Request for Re-rating-Food Hygiene Rating Scheme

Re-ratings will be undertaken when a Food Business Operator has taken action to rectify non-compliances identified during the most recent inspection and submits a satisfactory request to the authority for their Food Hygiene Rating to be re-assessed.

The re-rating inspection should take place in accordance with the scheme. Such an inspection should, whenever practicable, be undertaken by the officer who undertook the original inspection. Twenty one requests were processed and determined during 2023-24.

4.9 Food Complaints and Requests for Service

All food hygiene complaints that are not anonymous and relate to food bought within the county are investigated. It is the food safety service's policy to give a first response within 5 working days to all food and food premises complaints.

Similarly, all complaints (not made anonymously) received in relation to food standards or primary production will be responded to within 5 working days.

The following table details the number of food safety complaints received over the last three years.

Food Safety Complaints

Year	Hygiene of Premises + practices	Food hygiene issues (microbial, foreign body, chemical contamination)	Food standards (Composition, additives)
21-22	82	13	10
22-23	34	62	19
23-24	29	66	18

The fluctuations in numbers over the reported years under consideration do not, of themselves, raise issues in terms of resource allocation. This also applies to the number of service requests received, as shown in the table below.

Service requests

Year	Food hygiene and food standards	Of which were requests for advice
18-19	1083	653
21-22	1346	497
22-23	972	442
23-24	1038	433

. At the end of the year 112 actionable service requests remained 'in progress'.

4.10 Primary Authority / Home Authority and Advice to Business

The Regulatory Enforcement and Sanctions Act 2008 established the Primary Authority Scheme as a statutory scheme. Under the scheme businesses can choose to form a partnership with a local authority that will govern the way that the business is regulated by all Local Authorities.

A Primary Authority may provide a key point of contact for a business that it partners in relation to other Local Authorities which regulate it. A Primary Authority may also offer a lead on regulatory matters concerning the business.

Cyngor Gwynedd has no primary authority agreement in place. However, Officers are bound to abide by Primary Authority Agreements which are in place for businesses with outlets within the area.

The Home Authority Principle is an 'arrangement' to help businesses by providing a point of contact /advice to the business and other local authorities, usually at the Local Authority where the head office or main operation is located.

Cyngor Gwynedd will follow the Home Authority principles when contacted by other Authorities in relation to businesses based in the area.

Advice is offered to any business that has trading premises within Gwynedd unless the trader has a Primary Authority arrangement with another local authority. This is achieved by providing advice directly to businesses and through the provision of training courses which may be held locally.

4.11 Food Sampling and Inspections

Food and drink supplied, produced and sold within the County is sampled in accordance with a planned sampling programme and where necessary, in response to food complaints / investigations.

The main sampling effort during 23-24 was our 'shopping basket' sampling programme which entails an officer visiting businesses to purchase various foods which are then subject to microbial analysis. 132 such samples were taken.

In 2023-24 10 samples of milk from self service units were taken and 98 shellfish samples from the Menai.

No food standards samples were taken during the year.

The Service undertakes routine sampling of shellfish from classified harvesting areas to

monitor their hygiene status. Data obtained from the sampling is used to ascertain whether or not the classification is accurate.

Samples are taken on a quarterly basis from two sites and on a monthly basis from six sites. Two of the six (monthly) sites are sampled twice a month between April and September.

Food samples are analysed by Public Health Wales Microbiology, Ysbyty Gwynedd, Bangor and the Public Analyst Scientific Service Ltd, in Wolverhampton. The Centre for the Environment Fisheries and Aquaculture Science (CEFAS) laboratories are used occasionally for processing shellfish samples.

4.12 The Investigation of Outbreaks and Food Related Infectious Disease

The Service investigates all outbreaks and notifications of food related disease in accordance with accepted procedures and advice from its Proper Officer.

There exists, between Public Health Wales (PHW) and Cyngor Gwynedd formal arrangements to identify and investigate cases of food poisoning. All laboratory identified cases of food poisoning are notified directly to the food safety section for investigation.

During 2023-24 47 service requests involving communicable disease were received.

The table below gives the total number of confirmed notifications of the most commonly reported potential foodborne infections directed to the Authority from PHW during the last three years.

Disease causing agent (confirmed)	Total 21-22	Total 22-23	Total 23-24
Campylobacter	201	226	222
Salmonella Enteritidis	8	12	5
Other Salmonellas	2	2	13
Giardia Lamblia	9	13	22
Cryptosporidium	20	16	35
Verocytotoxic E.Coli including 0157	34	43	45
TOTAL	274	312	342

The year on year increase in confirmed communicable disease cases may be attributed, in part, to the adoption of more accurate and sensitive testing techniques for enteric pathogens by the Public Health Wales laboratories from 2018-19 onwards.

4.13 Food Safety Incidents

The FSA declares food safety incidents from time to time and notifies food authorities accordingly. Some of the notifications are for information only and some are for action.

The Service has a documented procedure for dealing with Food Safety Incidents and Alerts following notification through the Food Alert system.

One localised food hazard incident required action during 2023-24. A food manufacturer's own product testing arrangements uncovered salmonella contamination of a finished product. This necessitated the implementation of product recall measures and further investigatory work which involved public protection officers.

4.14 Liaison with other Organisations

The Food and Safety Service collaborates with the following groups or organisations which are involved with food safety issues. Partnership working is undertaken to ensure that food safety work within the County of Gwynedd is consistent with those of neighbouring local authorities, that service improvements can be identified, and that competence based training can be accessed.

- Welsh Government
- Directors of Public Protection Wales (DPPW)
- Welsh Heads of Environmental Health Group (WHeEH)
- Wales Heads of Trading Standards (WHeTS)
- North Wales Food and Communicable Disease Panel (NWFCDP)
- Welsh Food Microbiological Forum (WFMF)
- Public Health Wales (PHW)
- North Wales and Deeside Shellfish Liaison Group (NWDSLGL)
- Gang masters Licencing Authority
- Natural Resources Wales
- Care Inspectorate Wales (CIW)
- Centre for Environment, Fisheries and Aquaculture Science (CEFAS)
- Welsh Water (WW)
- Food Standards Agency (FSA)
- National Food Crime Unit (NFCU)

4.15 Food Safety Promotion

Dependant on available resources, the Service carries out health promotion exercises covering food safety issues.

Over the past year but the service has assisted the FSA in promoting initiatives on Cyngor Gwynedd's social media sites such as;

Here to help campaign (May 2023). Promoting new business guidance and advice to businesses on food hygiene inspections.

Student Kitchen Campaign (September 2023) . Provision of targeted food safety advice.

Celebrating 10 years of FHRS display campaign (November- December 2023)

In addition, the service undertook the following targeted campaign:

The provision of food safety advice to Gwynedd sweet shops and retailers – information relating to prohibited ingredients found in imported sweets and drinks (May 2023)

4.16 Food Safety Training for Officers

It is the Council's policy to comply fully with the requirements of the Food Law Code of Practice (Wales) in relation to staff training and the qualifications of authorised officers. This includes access to external training on specialist topics, supplemented by regular in-house update training for authorised food safety officers.

Officers involved in enforcing food safety legislation should therefore receive a minimum of 10 hours continuing professional development training directly related to the delivery of official controls and a further 10 hours on other professional matters, during any year.

Officers involved with food hygiene enforcement in primary production establishments will receive a minimum of 4 hours training relating to their responsibilities during the year.

Staff training provision is met using online resources and 'face to face' events.

Three part authorised officers continue to require specialist training. In addition, two recently recruited (unqualified) in officers have started an MSc in Environmental Health during January 2024. A Public Protection Trainee is also currently studying for a higher certificate in food control qualification (1st year).

4.17 Food Safety Formal Action

All enforcement action will be taken having regard to the Public Protection Enforcement Policy. This may range from informal action, through to the service of formal notices including hygiene improvement notices, remedial action notices or hygiene emergency prohibition notices, or ultimately recommendations for prosecution. The main aim is to ensure that all food businesses within Gwynedd produce food that is safe to eat and that they comply with the requirements of the food safety legislation.

The next table details the number of written warnings and formal notices issued by the service over 3 years and the number of prosecutions concluded over the same periods.

Year	2021/22	2022-23	2023-24
Voluntary Closure of Food premises	2	2	5
Seizure, detention or voluntary surrender of food	0	0	1
Hygiene Improvement Notice	2	4	5
Remedial Action notice	0	1	3
Food Standards Improvement Notices	2	2	3
Food hygiene Written Warnings	251	803	820
Food Standards Written Warnings	153	432	319
Food Hygiene Prosecution	0	0	0
Food Standards Prosecution	0	0	0

4.18 New Businesses

All new food businesses in Gwynedd are subjected to an intervention visit and are provided with advice and guidance to ensure that those businesses are compliant with food safety legislation from the outset.

New business notifications / registrations are subject to risk assessment to determine when they should receive their initial inspection. We aim to inspect those deemed potentially high risk within 28 days from starting to trade.

A comparatively high number of new food businesses open in Gwynedd yearly which imposes a substantial added burden on the service. The table below details the numbers of new business registrations received over the past three years.

Year	Number
2021-22	245
2022-23	262
2023-24	253

Conversely, a significant number of premises close annually. During 2023-24 340 food businesses also ceased trading in Gwynedd.

5.0 Resources

5.1 Financial Allocation

The tables (x3) below show the total net costs to Cyngor Gwynedd of undertaking food safety work for the past 4 financial years; 2020-21 – 2023-24 (tables 1-3). Each table relates to a specific food safety element (food hygiene, food standards and food hygiene at primary production)

Key contributions to the overall net costs (staff, procurement, contribution to other Council Services [central] costs) are specified. (The majority of Travel, procurement and administration costs form part of the staff costs)

Table 1: Costs of Food Hygiene work 2020-21 – 2023-24

Food Safety Element	Total Net Costs	Staff Costs	Travel /Sustenance	Procurement: Equipment, sample analysis, services.
Food Hygiene 2020/21	£444,170	£423,501 (Of which £23,202 is administration costs)	£402	£4917
Food Hygiene 2021/22	£467,406	£457,154 (Of which £21,204 is administration costs)	£1312	£7563
Food Hygiene 2022/23	£481,265	£448,732 (Of which £23,130 is administration costs)	£1266	£8,979
Food Hygiene 2023/24	£431,578	£406,081 (Of which £28,593 is administration costs)	£1,038	£6,716

Table 2: Cost of Food Standards work 2020-21 – 2023-24

Food Safety Element	Total Net Costs	Staff Costs	Travel /Sustenance
Food Standards 2020/21	£227,908	£206,989 (Of which £21,096 is administration costs)	£0
Food Standards 2021/22	£209,085	£192,782 (Of which £21,011 is administration costs)	£0
Food Standards 2022/23	£214,232	£190,107 (Of which £23,130 is administration costs)	£0
Food Standards 2023/24	£216,737	£188,275 (Of which £28,442 is administration costs)	£0

Table 3: Cost of Food Hygiene at Primary production work 2020-21 – 2023-24

Food Safety Element	Total Net Costs	Staff Costs	Travel /Sustenance
Food Hygiene at Primary Production 2020-21	£32,643	£10,947	£0
Food Hygiene at Primary Production 2021-2022	£33,134	£12,122	£0
Food Hygiene at Primary Production 2022-2023	£35,086	£9,040	£0
Food Hygiene at Primary Production 2023-2024	£41,212	£12,169	£622

The service contributes towards other Council services which assists with service delivery, this includes the Authorities in house legal service.

There will be other contributions which impact upon the reported total net costs of the Service. For example, the Service made an 'income' of £10,848 during the year.

Due to increased costs / limited increases in funding from central government all Local Authorities in Wales have found it necessary to identify increases in income / budget cuts to meet their respective financial obligations during 24-25. As part of a savings package Cyngor Gwynedd has decided to cut £100,000 from the Public Protection budget. At the time of writing how this cut is to be achieved has not been finalised.

5.2 Staff Resource

There are currently 14 officer posts (2 temporary) allocated to the Food and Safety Service with additional contributions towards food safety work by 2 trading standards posts. (excluding managers and support staff).

Over the past 12 months there have been significant changes within the service with 1 experienced officer leaving in September 2023.

Three officers which were employed within the service but without the necessary qualifications to undertake official food controls qualified during 2023. All are now authorised to undertake the majority of official food controls.

Two officers were recruited in October 2023. They are not authorised to undertake official food work but have started MSc's in Environmental Health. It will be a minimum of three years before they are qualified / obtain the necessary experience to undertake official food controls.

One of the posts within the service is that of a trainee public protection officer. The individual who occupies this post is currently sitting the higher certificate in food control.

Two officers were employed on a part time basis during quarter 4 of 2023-24 to undertake food safety inspections.

At the end of the year 1.4 full time equivalent (FTE) of officer posts was vacant.

It is expected that a further officer will be temporarily absent from work during 24-25.

All of the officers within the service undertake a range work in addition to food safety, commensurate with their authorisations and established competencies.

The tables overleaf detail the FTE which were available to the Council and involved with food work (excluding two officers in training) on the 31/3/22, 31/3/23 and 31/3/24

Food Hygiene

Post	FTE 31/3/22	FTE 31/3/23	FTE 31/3/24
Public Protection Officer	3.9	3.4	4.2
Public Protection Enforcement / compliance officer	2.4	2.55	1.5
Food Sampling Officer	0	0.4	0.4
Public Protection Manager	0.5	0.45	0.4
Contribution from other posts (Administration)	0.55	0.6	0.6
Total	7.35	7.4	7.1

The FTE available to undertake official food hygiene controls on the 31/3/24 was 5.7

Food Standards

Post	FTE 31/3/22	FTE 31/3/23	FTE 31/3/24
Public Protection Officer	1.9	1.6	2.1
Public Protection Enforcement / Compliance Officer	1.1	1.25	0.9
Public Protection Manager	0.45	0.5	0.45
Contribution from other posts (Administration)	0.04	0.2	0.2
Total	3.49	3.55	3.65

The FTE available to undertake official food standards controls on the 31/3/24 was 3

Food Hygiene at Primary Production

Post	FTE 31/3/22	FTE 31/3/23	FTE 31/3/24
Enforcement Officer.	0.1	0.1	0.1
Public Protection Managers	0.05	0.05	0.05
Total.	0.15	0.1	0.15

The FTE available to undertake official food controls at primary producers on the 31/3/24 was 0.1

A high proportion of food hygiene inspections are combined with food standards inspections.

To fully comply with the Code of practice (Wales) requirements it is suggested that at least 14 *operational staff* (Public Protection officers and Public Protection Enforcement / Compliance Officers) should be allocated to the service with at least 7.75 FTE dedicated to food hygiene work and 4.5 FTE dedicated to food standards work.

6.0 Quality Assurance

6.1 Documented procedures

To ensure the quality and consistency of our service processes, procedures and work instructions are documented and retained electronically. Documented procedures identify responsibility for the work carried out. Documents can be accessed by all staff via a shared Directory.

6.2 Assessment and audits

The quality of our policies and procedures is assessed in a number of ways, namely:

- The Public Protection Manager undertakes regular monitoring of a variety of enforcement work (i.e. inspections, letters, improvement notices, risk rating scores) and provides feedback to the officers. Internal audit of documented procedures and work instructions also takes place as required / annually.
- Internal audits
- Audits undertaken by the Food Standards Agency.

Other monitoring arrangements include

- Consideration of corporate complaints and compliments about the service.
- Regular team meetings to give the opportunity to discuss inspection and enforcement issues and to promote general consistency.
- Consistency exercises, especially for risk ratings.
- Peer review exercises.

This year the Service will be subject to an internal audit/ review by the Ffordd Gwynedd Unit in an attempt to identify improvements / efficiency gains.

7.0 Review

7.1 Review Against the Service Plan

The service delivery plan should be subject to annual review. The review will link into the annual business planning process.

Performance is monitored regularly with a bi-monthly management review of progress. Performance Reports are undertaken detailing performance against National and Local Indicators. Key issues arising in each monitoring period can then be quickly identified and addressed.

7.2 Review of Performance Against 2023-24 Service Plan

Appendix 1 provides a summary of service delivery during 2023-24

The key areas for improvement / action listed in the 23/24 service plan are listed below, together with an explanation of what the Authority has done to achieve these.

Key Area 2023-24	Actions / Result
Where possible, we will focus our inspection effort on our low risk premises which have not received an intervention for a considerable period of time.	All low risk overdue inspections were not completed by the 31.3.24. This is because the service has lost a number of competent authorised officers over the past two years. Consequently, inspection effort was concentrated on high risk premises and new businesses. The overdue low risk businesses will be our focus for quarter 1 24-25.
The Authority will attempt to fill two vacant enforcement officer posts which currently exist within the food team.	2 officers have been employed and have started postgraduate courses and other relevant training.

Three officers will complete their training and competency requirements which will allow them to be authorised to undertake official food controls	Authorisation issued to all three officers
Improving compliance with allergen requirements within businesses who prepare food to be consumed on their premises and in takeaway businesses.	Ongoing
Address food labelling issues and illegal additives in imported sweets and soft drinks sold by local businesses.	Targeted campaign completed.
Continue to support businesses by providing information and guidance	Ongoing
Adapt to alternative business trading practices – reduced opening hours, evening and weekend opening only.	Ongoing – seasonal premises /premises following irregular opening hours causing a problem for unannounced inspections.
Provide training to officers and specialist Food Safety Management Systems training to three officers	Ongoing – additional food safety systems (HACCP) training required
Identifying premises which are open on a seasonal basis (summer months only) and undertake interventions at such premises when they are trading.	Proving difficult- businesses are not informing us of reduced opening hours / switch to seasonal opening.
Review of our food premises database to ensure accuracy.	Done

Providing advice to and reviewing food safety arrangements at large scale events including the National Eisteddfod.	Done
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7.3 Achievements

In addition to the work outlined in Appendix 1 key service achievements over the period of last year for food hygiene and standards include:

- All category A (Hygiene and Standards) inspections were completed.
- The majority of hygiene risk category B+ C inspections were undertaken.
- Completion of reactive work including enforcement in cases of non – compliance, managing food hazards and investigating and managing complaints.
- Recruitment of two Public Protection officers
- 3 qualified officers achieved competency to undertake food controls and were duly authorised.
- The Service participated in FSA initiatives using social media as a tool to communicate key messages and also completed a targeted food safety campaign.
- Officers maintained their professional development by undertaking online and face to face food safety training.
- Undertook food inspections and provided advice at The National Eisteddfod, Boduan, Pwllheli.
- Completion of an extensive hygiene sampling programme in accordance with national priorities

7.4 Service Delivery for 2024-25

The following areas of service delivery have been identified as a priority for 2024-25: -

- The Authority will inspect all businesses overdue an inspection up to and including the 31/3/24
- The identification and timely inspection of seasonal premises when trading.
- Ongoing training
- The completion of an internal review /audit (Ffordd Gwynedd) of the Food and Safety Service – implementing and efficiency recommendations / changes resulting from this.

- Improving compliance with allergen requirements within businesses who prepare food to be consumed on their premises and in takeaway businesses.
- Continue to address food labelling issues and illegal additives in imported sweets and soft drinks sold by local businesses.
- Continue to support businesses by providing information and guidance.
- Continue to adapt to alternative business trading practices – reduced opening hours, evening and weekend opening only.
- Trialling recording the results of inspections using electronic forms/ tablets.

7.5 Factors likely to have an impact on service delivery during 2024-25

Factors likely to have impact on service delivery this year include:

a)The lack of resource in terms of the number of qualified staff available to undertake food safety work.

At the end of March 2023 there were 11 authorised officers undertaking food safety work. In addition. These officers also undertake other duties (health and safety work, public health work and so on.

The Service requires approximately 7.75 FTE allocated to official food hygiene work and 4.5 FTE allocated to official food standards work in order to fully comply with the food law code of practice requirements.

The 11 authorised officers undertaking food control in March 2023 equated to 5.7 FTE available to it to undertake official food hygiene work and 3 FTE available for official food standards work.

The service has been unable to recruit experienced qualified officers and has therefore taken steps to address this by employing 3 trainee officers. These officers are currently studying for academic qualifications which will allow them to undertake official food controls. However, this will take some time; 2-3 years minimum.

To compound matters there are currently nearly 1 ½ empty posts within the food and safety service. Also, one of the 11 officers previously mentioned will not be working during 2024-25.

Given the resource issues and the number of outstanding inspections still due from the previous year 2023-24 (174 food hygiene inspections and 213 food standards inspections)

full compliance with the code of practice requirements / recommendations will not be achieved for the coming year.

Work will be prioritised on a risk based basis with a focus on the following:

Reactive enforcement

Reactive management of food incidents and food hazards

Reactive investigation and management of complaints relating to food, food business premises and practices

Completing overdue programmed inspections up to and including 31/3/24

Undertaking programmed Hygiene and Standards inspections of Risk category A businesses

Inspecting newly registered businesses

Undertaking programmed Hygiene inspections of Risk category B and C businesses and food standards inspections of the same businesses if due within the following 12 month period or overdue at the time.

Undertaking programmed inspections of Approved Establishments

It is not expected that the Service will achieve full compliance with the food law code of practice until:

- i) There is an adequate number of authorised staff available to the service.
- ii) Overdue inspections and work which has accumulated in the meantime is dealt with.

Stating a target date for full code alignment is problematic but at things stand this will not be achieved for a minimum of 2-3 years.

b) Gaining access to premises. Premises are open less and have become more seasonal or open out of normal office hours. Inspections workload over the summer months is higher than at other times of the year. Inspections out of normal office hours are likely to increase.

c) The number of new food businesses registering with the Authority continue to be relatively high. This is because a number of businesses are unsustainable and are closing with new businesses opening in their place. This is placing a sustained and significant demand on the Service as all new businesses are scheduled to be inspected within 28 days of opening.

d) It is now thought that the special procedures licensing regime will be formally implemented in Wales during October / November 2024. The majority of the officers undertaking official food safety controls are also authorised to enforce the Public Health Act and subordinate regulations which contain the new licensing requirements. Consequently, a significant amount of officer time may be required to deal with this which will inevitably result in less time to undertake food work.

e) Recording inspection findings and producing reports is taking a significant amount of time – it is hoped that the internal service review will identify measures (for example the use of tablets to record inspection findings) which will reduce the time taken to complete this work.

f) Requiring competent officers to assist with the training of unqualified / trainee officers, thereby taking up staff resource which would otherwise be used to complete official controls.

g) Food costs inflation is having a significant impact on both the public and food business's finances. This may in turn negatively impact upon food safety standards resulting in more enforcement work for officers.

APPENDIX 1 PERFORMANCE SUMMARY

Food Hygiene 2023-24

Food Hygiene Inspection Programme

The table below details the programmed food hygiene interventions carried out during the year and the number of interventions which should have been undertaken but were outstanding as of 31/3/24

Risk Category	Achieved	Outstanding
A High Risk	6	0
B High Risk	38	0
C High Risk	305	16
D	227	37
E	287	114
Unrated	264	7
TOTAL	1127	174

During the financial year 340 food premises closed

National Food Hygiene Ratings Scheme

On the 31/3/24 of the food businesses which fall under the food hygiene rating scheme in Gwynedd 98.81% fell into the Broadly Compliant category for Food Hygiene legislation (Score of 3 or above).

Twenty four premises (1.19%) were not broadly compliant (score of 2 or below)

Number of Requests for Rescore Visits Undertaken :21

Number of Appeals on Rating received and determined– 1,

Food Complaint Investigations

Food Hygiene Complaints	66
Hygiene of premises / practices complaints	29

Enforcement Actions

Improvement Notices	5
Remedial Action Notices	3
Written Warnings	820
Voluntary Closure	5
Seizure /detention/Surrender of Food	0
Prosecutions concluded	0

Food Standards 2023-24

Interventions Programme

The table below details the programmed standards hygiene interventions carried out during the year and the number of interventions which should have been undertaken but were outstanding as of 31/3/24

Risk Category	Achieved	Outstanding
A High Risk	10	0
B Medium risk	233	68

C Low risk	459	138
Unrated	264	7
Total	966	213

Food Standards Complaint Investigations

Food Complaints	18
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Enforcement Actions

Improvement Notices	3
Written Warnings	319
Prosecutions concluded	0
Seizure /detention/Surrender of Food	1