Bath & North East Somerset Council

Improving People's Lives

Official Feed and Food Control Delivery Plan 2026/27



Bath and North East Somerset Council
Feed and Food Service Plan 2026/27
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1 SERVICE AIMS AND OBJECTIVES

1.1 Introduction

This Service Plan sets out how Bath and North East Somerset Council intends to provide an effective food safety service that meets the requirements of the Food Standards Agency (FSA) Framework Agreement. It covers the functions carried out by authorised officers of the Food, and Health and Safety Team in relation to food safety, and the Trading Standards Team in relation to food standards and animal feed stuffs. Activities are carried out under the provisions of the Food Safety Act 1990, the Food Safety and Hygiene (England) Regulations 2013, The Animal Feed (Hygiene, Sampling etc. and Enforcement) (England) Regulations 2015 and relevant regulations made under the European Communities Act 1992 and/or the European Union (Withdrawal) Act 2018.

1.2 Aims and Objectives

Food Safety and Food Standards

We aim to ensure that all food and drink that is produced, stored, distributed, handled or consumed in Bath and North East Somerset is safe and is how it is described. This will be achieved by:

Checking compliance with food safety and standards legal requirements using:

- Programmed inspections, prioritising visits by potential risk to health and local risk assessment.
- Targeted interventions including alternative enforcement strategies for lower risk businesses
- Investigation of complaints from the public
- Investigation of notifiable infectious diseases, following up allegations of food business involvement and preventing secondary infections
- Taking food samples guided by local intelligence, and as part of national sampling initiatives in partnership with United Kingdom Health Security Agency (UKHSA) and the FSA.
- Inspections of companies that import and export of food

In addition, and where resources allow:

- Supporting FSA and UKHSA national campaigns through promoting health protection and food safety messages via media channels
- Working in Primary Authority Partnerships with 3 business partners
- Provision of food allergen training for food handlers
- Support new businesses in achieving compliance and good food hygiene ratings from the outset and support existing food businesses to maintain or increase ratings by providing paid-for advice.
- Provision of labelling and compositional advice to businesses

Animal Feedstuffs

We aim to ensure that safe animal feed is produced by businesses who comply with legal duties and do not pose a risk to animal or, ultimately, human health. This will be achieved by:

- Monitoring of feed used on farms
- Monitoring the manufacturing, mixing, storage, and transportation of animal feed stuffs
- Monitoring feed safety management systems at businesses supplying former foodstuffs or co-products
- Monitoring hygiene at primary producers such as arable farms and higher risk fresh produce such as salad crops
- Responding to feed incidents where feed must be recalled or withdrawn
- Verifying the accuracy of feed labelling particulars

1.3 Links to Corporate Aims and Objectives

In 2023 Bath and North East Somerset Council published its new Corporate Strategy for 2023 to 2027. This builds on our previous strategy, adopted in 2020, retaining our purpose, values, core policies and principles, whilst also introducing an extended outcomes framework to further refine our priorities.

We have two core policies – tackling the climate and nature emergency and giving people a bigger say. These will shape our work and we have expanded these policies with the following ambitions:

1. To lead the UK in climate and nature action, building a sustainable future for Bath and North East Somerset - net zero, nature positive by 2030
2. To listen to and work with residents to act on their concerns.

To continue to translate our purpose into commitments, we have retained and adapted our three principles with extended ambitions:

1. Preparing for the future - we will work towards a resilient, sustainable economy that is fair, green, creative, and connected
2. Delivering for residents - we will continually improve frontline services across our communities, whilst protecting the most vulnerable
3. Focusing on prevention - we will invest in prevention across all services to tackle inequalities and improve local areas.

This plan demonstrates how the Council aims to improve people's lives by ensuring our food businesses are compliant with the food safety and standards legislation and support the local economy and tourism that the Authority's UNESCO World Heritage Site status brings.

2 BACKGROUND INFORMATION

2.1 Profile of Bath and North East Somerset

The Council covers approximately 500 square km stretching from Chew Valley Lake in the west to Bath and the Wiltshire border in the east. In 2024 the population of Bath and North East Somerset Council was estimated to be around 200,000 residents.

- Bath is the largest urban area in B&NES. The population in 2024 was estimated to be around 106,500 people
- Economic activity in B&NES currently stands at 80.4% (2024 data)
- B&NES has an unemployment rate of just 2.5%, compared to the national average of 5.2% (2024 data)
- Local skills levels are high, with 40% educated to degree level or higher (2024 data)
- The majority of economic inactivity comes from the very high numbers of students in the authority

The majority of food businesses fall within the catering and retail sectors. There are a small number of food manufacturers in the area providing a range of products such as milk, cheese, beer, cider and ice cream.

All interventions with businesses and members of the community are carried out in line with the Local Authority's commitment to equality of opportunity for local people as stated in the Equal Opportunities Policy.

2.2 Organisational Structure

There is a cabinet of councillors appointed by the Council. The cabinet is responsible for making all the executive decisions required at member level. These decisions may be made collectively or individually by the cabinet Councillors. Executive decisions are those that are concerned with implementing major policies agreed by the Council and setting new service policies. The Council also appoints a councillor to be the Leader of the Council. In the 2023 local elections the administration retained a significant Liberal Democrat majority.

The cabinet comprises the leader and 9 cabinet members.

The food and feed roles are within the Public Protection area in the Community and Compliance Service of the Place Management Directorate. Food safety controls are carried out by members of the Health, Safety and Food Team, whilst food standards and feed remain a duty of the Trading Standards team, although they are supported by the Health, Safety and Food Team in delivering some standards work. Appendix 1 shows the organisation of the teams currently responsible for the food safety, food standards and feed services. The Cabinet member for this service is – Cllr Manda Rigby (Communications & Community)

Officers in the Health, Safety and Food Team deal with the full range of food safety and hygiene related issues, infectious disease investigation and food safety and hygiene service requests. Officers in Trading Standards enforce animal feed legislation, food standards such as labelling and composition, and lead on food allergen investigations.

Bath and North East Somerset Council is supported by the UKHSA which has been delegated the Proper Officer role by the Director of Public Health for receiving

notifications of statutorily notifiable infectious diseases. We also have good working relationships with the UKHSA laboratory at Porton Down, Wiltshire, PASS Scientific Services laboratories, and the West of England Food Liaison Group (WoEFLG) comprising our 5 neighbouring local unitary authorities.

2.3 Scope of the Service

The Council's Food Safety and Food and Feed Standards services are delivered by the Public Protection Service.

Officers work flexibly either at Keynsham Civic Centre, from home or hot desking in Lewis House and the Guildhall in Bath, or the Hollies in Midsomer Norton.

The Council's general contact number is **01225 477000**

Generic team email inbox: Public_protection@bathnes.gov.uk

The operational hours for all Council buildings are:

- Mon-Thurs 08:30-17:00
- Friday 08:30-16:30

Bath and North East Somerset Council does not have a formalised Emergency Out of Hours service, but emergencies outside of normal office hours are referred to the Service or Team Managers.

<u>Health Safety and Food Team of Public Protection</u>

- Ensures the registration of food business establishments, that require it.
- Ensures that the premises database is monitored to identify where businesses have incorrectly registered in the past or registration is no longer appropriate.
- Carries out all official control functions relating to food safety and low risk food standards matters e.g. interventions, inspections, audits, sampling at food establishments. Programmed visits are carried out according to risk priority in accordance with the inspection frequencies outlined in the Food Law Code of Practice. Premises currently rated A-C and newly registered/unrated businesses are given priority.
- Where appropriate, food businesses are given a food hygiene rating according to compliance standards found during an unannounced visit. Businesses are provided with the appropriate rating sticker and advice on how to improve, if necessary. Their ratings are uploaded to the FSA's national ratings website
- Our approach to regulating lower-risk food businesses (D and E rated) is under review. Last year, we completed physical re-inspections of all E-rated premises to confirm standards were maintained, which supported the development of a new alternative enforcement strategy. Under this approach, these low-risk premises will not require a physical inspection at every intervention. Updates to the Food Law Code of Practice also allow certain lower-risk D-rated premises to alternate between physical and remote interventions. All D-rated premises previously received in-person visits, and a proportion will now be assessed remotely. However, we will retain some physical inspections to avoid creating a significant inspection peak in two years' time.

- Low risk standards assessments are carried out by Food Safety officers as part of their routine inspections. Food Safety officers will refer labelling and complex allergen concerns found during routine inspections to Trading Standards colleagues.
- Undertaking hygiene inspections at higher risk food primary producers such as salad crops
- The Team offers tailored “paid for advice” to new businesses and existing food business operators to enable them to comply with the food safety legislative requirements & relevant guidance.
- Reviewing applications for events taking place in the local area and advising on food safety matters as part of the authority’s Safety Advisory Group for Events.
- Undertaking site visits to events where deemed necessary and inspecting food businesses operating at events. Issues will be followed up with the business’ registering/home authority as needed.
- The authority currently has 3 Primary Authority Partnerships.
- Identifying and assessing premises that require approval for specific food products of animal origin and ensures that they are issued with conditional and full approval as necessary.
- Investigating complaints concerning food, food establishments and food handling practices
- Investigating cases of suspected and confirmed statutorily notifiable food related infections. Follow up any allegations of links with food businesses and ensure that infected food handlers do not cause secondary infections
- Offers RSPH allergen training courses when resources allow this.
- The Food officers carry out gas safety checks and health & safety hazard spotting in all food businesses, and refer more complex issues to the Health and Safety Specialist Officer
- The team is also charged with gathering intelligence for Private Sector Housing Enforcement and reporting criminal intelligence to multi-disciplinary project teams
- Planned and re-active food sampling is carried out in-line with the sampling plan or in connection with complaints & infectious disease cases
- Export certificates are issued at a business’ request to enable food to be exported

<u>Food Standards</u>

- The Trading Standards Team has worked with the authority’s MIS provider Idox to implement the changes to the Food Standards Delivery Model and ensured that all food businesses have been risk rated according to this model.
- Carrying out a programme of inspections at food establishments according to risk priority and issuing improvement notices as required. Advising businesses during inspections on new legislation relating to novel foods, allergens, labelling and nutrition and health claims.
- Responding to all Food Safety team referrals and providing advice to businesses as appropriate or investigating the issues further.
- Taking routine samples throughout the year targeting allergens and current food concerns.

- The Team offers tailored “paid for advice” to food businesses to help them comply with Trading Standards legislation including composition and labelling
- The authority currently has 3 Primary Authority Partnerships
- Investigating complaints concerning food standards and labelling
- Leading on allergen complaints and investigations
- Responding to /Assisting with FSA recalls and withdrawals

Feed Service

- Ensuring the production of safe feeding stuffs, thus protecting animal welfare and ultimately the human food chain
- Undertaking programmed inspections at manufacturers, farms, transporters and businesses that supply food waste to the feed industry
- Assisting in the investigation and control of any alerts relating to feed stuffs
- Participating in the Food Standards Agency sampling programme

2.4 Demands on the Service

Appendix 2 provides details of;

- Establishment profile
- Number of Approved establishments
- Service Requests
- Other events that may impact on the service, for example the Christmas market
- Food Standards Sampling
- Microbiological sampling



2.5 Regulation Policy

The Teams adopt the principles laid down in the Enforcement Concordat which states that enforcement must be fair, consistent, and equitable. The Service's Enforcement Policy outlines the enforcement options available for dealing with problems relating to non-compliance with the legislation. In BANES non-complaint businesses who struggle to improve and maintain standards are offered a range of Businesses Support, to help them improve for example, where appropriate, the team will work with the FBO (Food Business Operator) to prioritise and implement improvements rather than seeking immediate enforcement action.

3 SERVICE DELIVERY

3.1 Interventions at Food and Feed establishments

Food Enforcement

Authorised officers undertake the full range of official control intervention options based on risk. In the majority of cases contraventions are minor and the food business operator is informally requested to carry out certain actions to comply with the law. However, during the course of delivering the food safety / standards service, officers may need to resort to formal action in some businesses, including issuing improvement notices or may accept voluntary offers for surrender or closure.

Premises Food Hygiene Ratings

Food premises are risk rated for Hygiene and Standards using the Food Law Code of Practice scoring system and this in turn calculates the Food Hygiene Rating (FHR) for relevant businesses, from 0 to the maximum 5. Premises are provided with the appropriate rating sticker by post or on-site if they are rated '3' (Generally Satisfactory) or above, and ratings are uploaded to the Food Hygiene Rating Scheme portal every 2 weeks. Queries, appeals against ratings and Right to Reply requests are considered by the Team Manager as Lead Food Officer. There is no ability for the Team to charge for these initial inspections. Requests for FHR re-rating visits are required to be made in accordance with the FSA's Brand Standard; the re-scoring visit may be undertaken by the same officer as the initial inspection. The existing charge for FHR re-score visits is under review and from 1st April 2026 all re-score visits will be chargeable (at any time) .(Currently, a business can receive a free re-score following a period of 3 months from the original inspection date or can pay if before 3 months). This should help generate income for the service, bring us in-line with neighbouring authorities & potentially reduce the number of re-score visits requested, enabling us to focus on the statutory work.

Feed

The Animal Feed (Hygiene, Sampling etc. and Enforcement) (England) Regulations 2015 consolidated the existing legislation relating to the enforcement of controls on the manufacture and processing of animal feeding stuffs and imposed additional controls on these establishments and also on primary producers, farms and other premises where feed is stored and on hauliers who transport feed. The authority is required to maintain a list of all registered and approved feed establishments within BANES. These premises are then inspected according to risk, to ensure that these establishments implement control systems based on Hazard Analysis and Critical Control Point principles.

Food Hygiene Inspection Programme

Public Protection's food premises database is maintained on the Authority's Management Information system (MIS) "IDOX Uniform". The number of programmed food hygiene inspections due in 2026/27 are shown in Appendix 6

Premises are rated between A - E in line with the latest revision of the Food Law Code of Practice -currently .

- ‘A’ rated premises should be visited every 6 months,
- ‘B’ rated every year,
- ‘C’ every 18 months
- ‘D’ every 2 years. Some lower-risk businesses can alternate between remote & physical interventions
- ‘E’ rated premises are subject to an Alternative Enforcement Strategy.

Current Position

During 2025-26 the Authority planned to achieve the following interventions by the end of March 2026.

- all approved premises inspections
- 100% of all A-C rated premises interventions;
- 100% of the D rated premises; (this is not likely to be achieved (as of March 2026) due to long-term staff absence, staff sickness & a vacancy towards the end of the financial year)
- 100% of all new and previously unrated businesses registrations.

A review of the Alternative Enforcement Strategy (AES) was also carried out to ensure that all E rated premises would be incorporated into the inspection regime by the end of 2026. This AES includes a number of interventions, from through the door inspections to telephone questionnaires and is both sector and risk specific. The aim was to ensure that all registered E rated premises received a “through the door” inspection.

Our current policy is for all new premises registering to be inspected by an officer. There is now flexibility under the Food Law Code Of Practice to triage & delay the inspection of lower-risk businesses by a further 28 days, but those higher-priority/risk businesses must still be inspected within 28 days of registration. We are aiming to still visit all new businesses within 28 days, where resources allow, rather than delaying the visit, but this does give us some flexibility.

We will have a backlog of D-rated premises next year due to long-term absence, sickness & a vacancy, but will aim to carry out an intervention of as many of these as we can in 26/27, including by using remote techniques to try and address this issue. We are also currently making progress to recruit to the vacant post and the officer on long-term sick leave, plans to be back at work from April 2026.

Inspection targets have proved to enhance performance management and there will be a focus this year on performance monitoring with the use of a new performance dashboard that is currently under development.

<u>Food Standards Inspection Programme</u>

The new Food Standards Delivery Model designed by the Food Standards Agency is intelligence led and allows for businesses to be risked according to 9 specific questions including the type of food sold, the complexity of the legislation, their supply chain, their history of compliance and their allergen controls. Each question is given a score by the

inspecting officer and the next visit date is automatically calculated. Visit due dates can range from 1 month to 120 months. Any business where serious concerns are raised will require a visit within 6 months of the previous visit and will have a priority intervention. Where the serious concern relates to allergen controls the visit will be conducted within 1 month.

As part of the inspection programme, Food Safety officers will assess food standards during their hygiene visits and refer any complex standards issues to Trading Standards officers. Trading Standards Officers will undertake visits to those businesses with more detailed specific labelling or compositional requirements. Joint visits are undertaken by the 2 teams to larger manufacturers, businesses of concern or businesses where there has been a previous history of non-compliance.

Historically, low risk and many medium risk food businesses were not visited for food standards due to resource constraints. Trading Standards officers prioritised their inspections to high risk businesses and those with known concerns, so have been using an intelligence led programme for several years. The FSA are now requiring all businesses to have a food standards visit and this will be achieved by Food Safety officers undertaking the visit as explained above.

Feed Inspection Programme

Funding is provided nationally for the feed visits and the number of visits undertaken by the Local Authority is dependent on the total number of premises in each of the following sectors: - livestock farms, arable farms, farms that mix their own feed, manufacturers (including home-based small pet food manufacturers), surplus food suppliers, co-product producers, transporters and importers. All premises are risk rated in a similar way to the food premises, and visits are undertaken by the lead feed officer and animal health officer. Food hygiene at primary production visits is also conducted under this funding and completed by the Food Safety Team. We usually have around 10-15 funded visits due each year.

See Appendix 6 for food and feed interventions programmed for 2026/27.

3.2 Feed and Food Complaints

The investigation of customers' service requests regarding food and feed safety is a significant area of work for the teams. All feed and food complaints are assessed and prioritised as appropriate by the 2 teams.

3.3 Primary Authority Scheme

Businesses or trade associations can form a Primary Authority Partnership with a local authority to assist with consistent enforcement. The guidance and advice the local authority provides must be taken into consideration by officers nationwide carrying out inspections and dealing with instances of non-compliance.

Bath and North East Somerset Council currently has 3 formal Primary Authority Partnerships which are shown in the following table:

Company	Type Of Partnership	Estimate of Time / Year
Nutrisure Ltd	Food hygiene and standards	2 days a quarter
Josh Eggleston	Food hygiene and standards Health and Safety	2 days a year
A David	Food hygiene and standards	1 day a quarter

Before the end of 2026 all existing contracts will have been reviewed & re-issued. This will now be carried out yearly prior to the start of the new financial year by the Team Managers.

3.4 Advice to Businesses

Bath and North East Somerset Council recognises that advice and support for food businesses needs to be constantly reviewed to ensure that the authority is able to deliver our official controls. Businesses are encouraged to "self-serve" and are directed to our business advice on the Bath and North East Somerset website. The Council also offers a paid for advisory service.

Most requests for advice for new businesses are now responded to by means of a standard email providing signposting information including links to gov.uk for registration, and to www.food.gov.uk for compliance advice. These emails are sent by our admin support staff.

A high number of businesses are provided advice by the Trading Standards Team for food standards issues. In 2025/26, 70% of all business advice requests received were for food issues. The different allergen labelling requirements have led to confusion for businesses and specific tailored advice is provided depending on business need.

Many other advice requests are about general labelling issues and businesses are encouraged to self-serve by being signposted to the Food Standards Agency advice pages and the Business Companion website, which is the national website for Trading Standards guidance. A paid for advisory service is also offered where extremely detailed advice is required.

Very few requests are received for feed business advice as we do not have many manufacturers in our area. We do proactively advise relevant businesses to ensure they register with the Council as this is a legal requirement.

3.5 Feed and Food Sampling

a) Food Sampling

i) Microbiological

Microbiological food examinations are undertaken by the UKHSA's Food, Water & Environment laboratory at Porton Down, Wiltshire. The laboratory also co-ordinates the regional sampling programme. The plan is developed to incorporate priorities identified by UKHSA, the Food Standards Agency and responds to requests based on local intelligence.

The microbiological food sampling programme is implemented each year which responds to specific local and national demands. The sampling programme is overseen by one of the Team Manager (Food & Health & Safety) who also represents the authority on the UKHSA laboratory regional liaison group.

ii) Food Standards

Sampling work falls into two categories:

- programmed
- reactive samples taken in response to a complaint

A food standards sampling programme is planned each year responding to local and national issues that have emerged, for example undeclared allergens at catering and takeaway establishments. In 2025/26 Trading Standards were successful in bidding for funding from the FSA for allergen sampling and will apply again in 2026/27.

Food Safety complaint samples are taken by the Trading Standards team when food standards complaints have been received, where appropriate, e.g. allergens continue to be priority area of work and samples may be procured as part of an investigation.

Eurofins in Wolverhampton act as our contracted Public Analyst.

b) Feed

No feed samples were taken in 2025/26 due to resource constraints. The animal health officer is completing a feed qualification in early 2026/27 which will allow the officer to undertake the full range of feed work including sampling. Previously only one officer was able to undertake the full range of feed work in accordance with the Feed Law Code of Practice.

Sampling is funded by the Food Standards Agency as part of the national feed programme, and we have applied for funding to take 2 samples in 2026/27 once the Animal health officer is fully feed qualified.

Eurofins in Wolverhampton act as our contracted Agricultural Analyst.

3.6 Control and Investigation of Outbreaks and Food-Related Infectious Disease

The Health, Safety and Food Team investigate food-related notifiable infectious diseases, in accordance with Standard Operating Procedures agreed between UKHSA's South West Health Protection Team and Environmental Health departments across Avon, Gloucestershire and Wiltshire. See Appendix 3 for numbers of notifications in 2025/26.

Cases of infection are notified to the Team by UKHSA in their role of Proper Officer as delegated by Bath and North East Somerset Council's Director of Public Health and

Team Manager – Food & Health & Safety . The response to notifications of illness depends on whether it is a single case or an outbreak. Patients suffering from all relevant infections are notified of their positive status by telephone during which a UKHSA standard trawling questionnaire is completed to identify the source of infection. If the patient is unavailable to complete this, they may be sent a link to the secure online version of this questionnaire. Otherwise, they are notified by letter and provided with a paper copy of the questionnaire to complete and return by post. Advice is also given to reduce the chance of secondary infections – cases are advised to speak to their GP however if they have any clinical concerns. The exception to this is Campylobacter cases, - a questionnaire is not undertaken in the first instance, and instead the affected person is sent a letter containing advice about infection control. The case is advised to contact the food safety team to discuss the case if they are part of a high risk group or are aware of the likely source of their infection. This is in line with national UKHSA guidance.

Investigation of outbreaks will be carried out in accordance with the Bath and North East Somerset Communicable Disease Incident and Outbreak Control Plan, agreed in partnership between Bath and North East Somerset Council's Public Health, Environmental Health and Emergency Planning teams and with UKHSA South West.

The Team contributes to the Bath and North East Somerset Health Protection Assurance Group, providing assurance to the Director of Public Health about health protection measures, safeguards and incident management within the district. One of the roles of this Group is to identify any risks in the district that could cause health protection issues.

The Team Manager – Food & Health & Safety represents Bath and North East Somerset Council at a quarterly liaison meeting between UKHSA South West and the regional Environmental Health departments.

3.7 Food Safety/Feed Incidents

Food and Feed Alerts are issued by the Food Standards Agency to relay information on national food issues to local authorities, the majority being "For information only". "Food Alerts for Action" require officers to undertake a variety of courses of action dependent upon the issue. This may include telephoning, visiting or mailshotting food businesses to give advice and ensure products are removed from the market. Formal procedures such as seizure and applying to Magistrates for a destruction order for food can be implemented where necessary, although this is unusual.

A significant amount of officer time can be taken up with product recalls when these relate to manufacturers or importers based within the local authority area.

Alerts for action in 2025/26 included:

- A national recall for contaminated dessert products, which involved products being removed from the market in the BANES area.
- The SMA baby follow on formula contamination and the banned mineral oil ingredient in a particular imported range of sweets (cancer concern).
- 1 feed incident was reported to the FSA where the contaminated products were withdrawn.

- 1 food incident was reported to the FSA when chocolate sold on Amazon did not declare an allergen.

Estimate of resources required: A nominal figure of 0.1 FTE may be appropriate as this is dependent on responding to local incidents.

3.8 Liaison with other Organisations

There are a number of stakeholders involved in the operation of the Council's food and feedstuffs safety and hygiene services including:

- UKHSA specifically:
    - UKHSA South West
    - UKHSA / EH South West Liaison Group
- The West of England Food Liaison Group (WoEFLG)
- South West Food Leads Coordination Group
- Trading Standards South West (TSSW)
- UKHSA Porton Down Lab Users Group
- The Food Standards Agency
- Bath and North East Somerset Council Health Protection Board

Estimate of resources required: 0.1FTE

3.9 Feed and Food Safety and Standards Promotional Work and Other Non-Official Controls Interventions

In recent years with the reduction of resources, food safety promotional work and other discretionary, non-statutory functions has greatly decreased and other ways of delivering information have been utilised, including: working with the Council Communications team to find efficient ways of promoting FSA campaign messages by using Bath and North East Somerset Council social media channels. In July 2025 Trading Standards sent out 242 guidance emails to relevant businesses with new FSA allergen labelling guidance.

Estimate of resources required: 0.1FTE

4 RESOURCES

4.1 Financial allocation

Food Public Protection Budget

In recent years the Food Safety and Trading Standards budgets have remained fairly constant.
See below for a comparison of team budgets from years 2024/25 to 2026/27

Year	Food and Health and Safety Team Budget £	Trading Standards Team budget £	Total FTE of both teams	Food Officers FTE	Food Admin FTE	Total budget allocated to Food Law Enforcement work 25/26
2024/25	491,578	399,773	16	6.25	1.0	448,600
2025/26	521,380	414,500	16.2	7.1	1.0	451,301
2026/27	506,244	427,697	Total: 15 6.6 (EH)+ 5 (TS) +1.4 (Admin) +2 managers	6.2 (5.2 EH and 1.0 TS)	1.0	448,292

Note:

The budget allocated to food work is based on a percentage of the teams budgets using the Food Law Enforcement return FTE figures.
The team budget excludes scientific services budget for food standards and foreign body sampling.

4.2 Staffing Allocation

A structure chart and a table of the allocation of FTE for official controls for 2026/2027 is available in Appendix 1.

Appendix 6 sets out the work programme for 2026/27 in terms of inspections due. The number of posts required to effectively deliver the food service is considered below.

Feed enforcement is carried out by the Trading Standards Team. This work is undertaken by the feed lead officer supported by the Animal Health Officer. Each officer is expected to commit 5 - 10% of their time to feed enforcement.

In relation to the completion of Hygiene controls, although there is no official ratio of recommended FTE per number of food businesses, a rule of thumb quoted figure is 1 FTE (front line) : 250 food businesses. Our current inspector to premises ratio is 1:408, based on 4.9 FTE and approximately 2000 food establishments.

Whilst we currently have 5.2 (4.2 as of 1 March 26 due to a vacancy) FTE Food Safety officers in post, the FTE of 4.9 food officers reflects the amount of time allocated for

official controls. The officers also undertake other duties such as infectious disease investigations, and health and safety checks which are not included in the FSA audit. Incidents in these other areas can have a significant impact on service delivery.

The animal health officer is completing a feed qualification in early 2026/27 which will increase team resilience in this area of work, as previously only 1 officer was fully competent and qualified.

Appendix 5 Shows the current staffing resource and assumptions of time allocated to the delivery of official controls for food hygiene.

Total allocation of officer to feed enforcement is 0.3 FTE.

4.3 Staff Development Plan

Feed and Food officers have regular 1-2-1s carried out approximately every 4-6 weeks, as well as career development conversations recorded on the authority's performance review system – Clear Review.

Food and Feed officers

To comply with the requirements of the Food Standards Agency's Food and Feed Law Code of Practice, officers must demonstrate ongoing competency if they are to be authorised to carry out the full range of law enforcement activities. All Authorised food Officers must undertake at least 20 hours of CPD (Continuing Professional Development) per year, with at least 10 being core food related training. Feed officers must carry out 10 hrs of feed related CPD per year. This is made up of either paid courses, training provided free by the FSA or other organisations, or internal cascade training on specialist areas provided by other team members.

In B&NES all training budgets are centralised. Due to financial pressures placed on the authority the Corporate training budget has been reduced and is always under pressure.Therefore, there is still a need for free on line training courses and subsidised face to face practical training which is essential for certain food and feed practices. Regional events are also welcomed to minimise distance officers have to travel and reduce accommodation and travel costs which can make training costs prohibitive

The Feed provision will be provided by the one qualified officer within the Trading Standards team with support from the Animal Health officer. The animal health officer is completing a feed qualification in early 2026/27 and will take on the lead feed officer role.

CPD is recorded in our internal team training matrices to enable the Team Leaders to monitor compliance with the competency requirement.

The review of staff competency is ongoing ensuring that the competency of team members conforms to the Code of Practice, and any gaps in competency are identified and addressed. In 2025 The FSA launched a new competency framework for food hygiene. The Team Manager (Food & Health & Safety) is currently working through this with all officers.

5 QUALITY ASSSESSMENT

5.1 Quality Assessment and Internal Monitoring

The services are required to monitor and report on their performance. New Key Performance Indicators are currently being agreed for the teams and a new performance dashboard is in development. This will enable performance to be monitored at a glance.

Quantitative assessment of outputs is measured by interrogation of the Uniform data base, where officers record details of all visits and interventions. This data is currently submitted to the Food Standards Agency via routine bi-annual surveys which have replaced the previous LAEMs system for data submission. Feed data is reported on a quarterly basis via the regional coordinator for TSSW who oversees the FSA Feed program for the South West of England.

A qualitative assessment will be monitored by the Team Manager or Specialist Officer by selection of random intervention records to examine in detail. The Team Manager will also periodically arrange for peer inspections for each officer. Team members are encouraged to assist each other when dealing with difficult or contentious cases except in the case of Food Hygiene Rating Appeals or similar which are dealt with by the Team Manager.

6 REVIEW

6.1 Review against the Service Plan

A review of this Plan and work plans for both the Health, Safety and Food Team and Trading Standards, food / feed service are undertaken annually. Details of the teams' performance can be found at Appendix 4.

6.2 Identification of any variation from the Service Plan

Where any deviation from the plan is identified, the Team Manager will arrange for the appropriate corrective action to be taken to address the situation. This could include:

- re-deploying resources from other areas of work which are assessed as being of lower risk or priority
- recognising that the target or objective is being achieved through other, but equally effective, means of service delivery
- obtaining additional resources to achieve the target by procurement from other competent service providers

6.3 Potential Risks

There is a risk that due to unforeseen emergencies the allocated resource may not be enough to deliver the required inspection levels. For example, in relation to the delivery of standards controls, allergen incidents take up a significant amount of officer time, and this together with other non-food and feed priorities could impact on the delivery plan.

In April 2025 the new food standards risk scheme was implemented but there have been issues with the MIS provider fully supporting the changes required.

6.4 Particular areas of improvement for 2026/27 include:

1. Ensure we comply with all the requirements of the Food Standard Agency's Food Law Delivery Code of Practice, specifically creating procedures, policies and plans that are required.

2. Consider how best to use new flexibilities in the FSA's Food Law Code of Practice, such as triaging new businesses and remote interventions to enable the team to focus on priority food hygiene inspections

3. Implementation of a series of sector focused self-assessment questionnaires to roll-out to E rated premises for food hygiene.

4. Implement a system for D rated premises that will enable alternative remote/physical interventions for food hygiene

5. Progress with completion of The Food Standards Agency Competency Framework & address any development needs for officers (food hygiene)

6. Ensure all Authorised Officers comply with the FSA's competency requirements including CPD attainment for food safety.

7. Monitor changes in the FSA approach to interventions, keep team members and managers abreast of developments and create a plan for any changes implicated.

8. Participate in UKHSA and FSA national campaigns where possible, with the assistance of the Communications Team

9. To ensure the reporting mechanisms are in place for the new Food Standards Delivery Model.

10. Exploring the use of AI in inspections to improve efficiency

11. Focus on data/performance monitoring, through the creation and use of a performance dashboard (standards & hygiene)

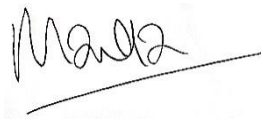
12. Enhanced use of RIAMS and development of in-house technical guidance to support officers and share knowledge (food hygiene)

13. Carry out further practical consistency exercises in relation to use of the Food Hygiene Rating Scheme

Signed by:



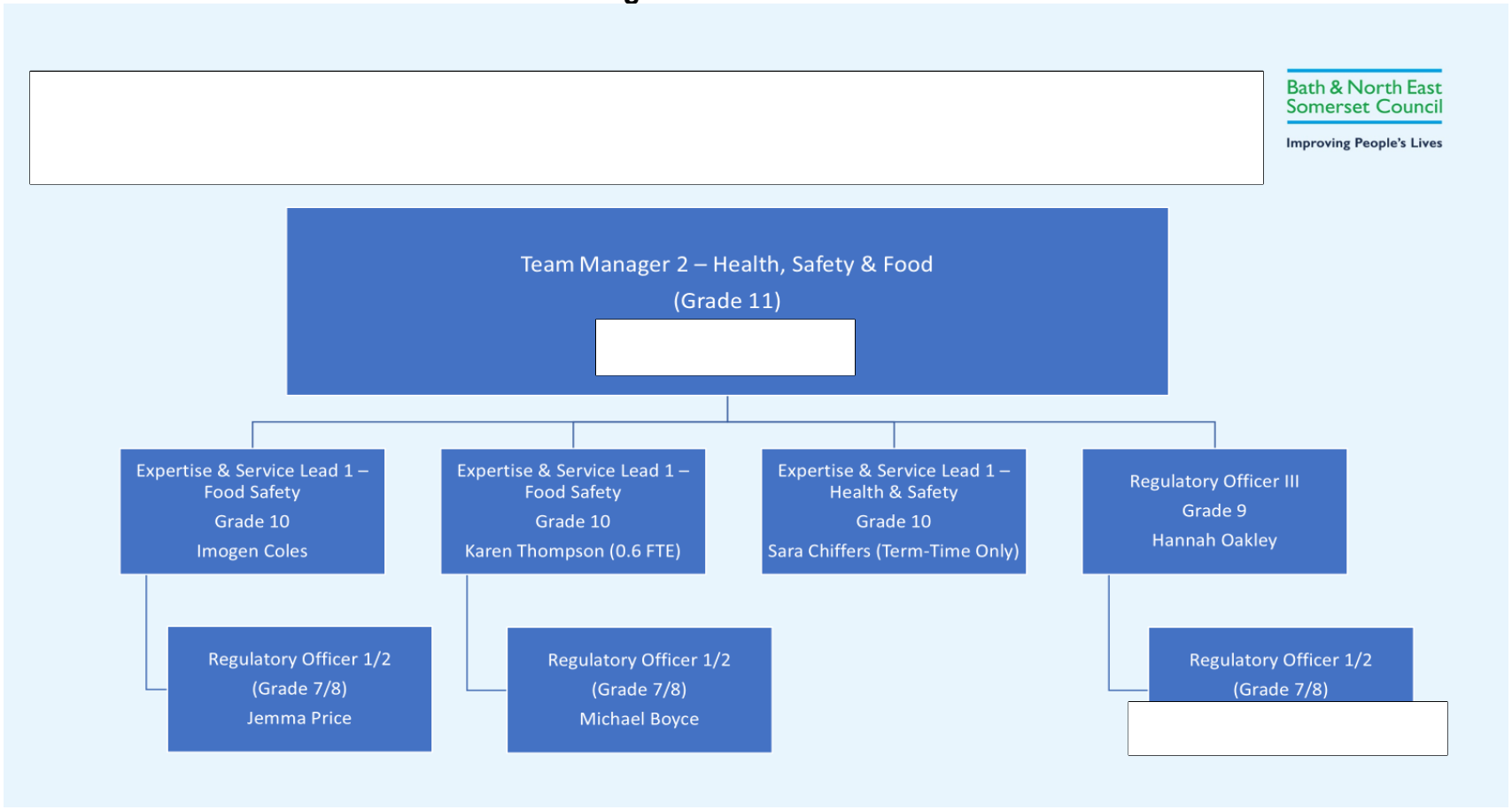
Aled Williams – Service Manager – Public Protection

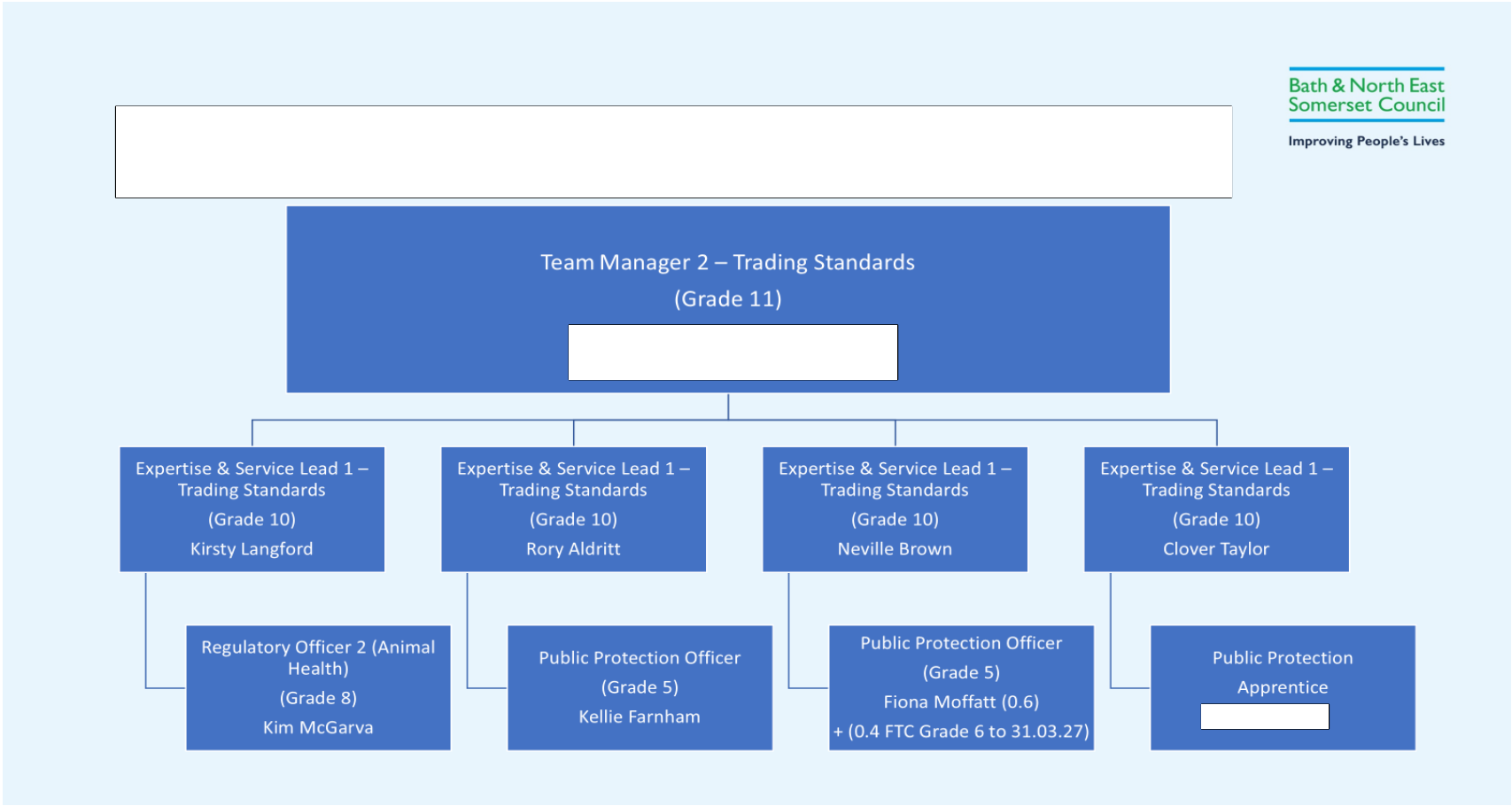


Cllr Manda Rigby -Cabinet Member Communications and Community

Appendix 1

Organisational Structure




Bath & North East Somerset Council
Improving People's Lives
Team Manager 2 – Trading Standards
(Grade 11)
Expertise & Service Lead 1 – Trading Standards
(Grade 10)
Kirsty Langford
Expertise & Service Lead 1 – Trading Standards
(Grade 10)
Rory Aldritt
Expertise & Service Lead 1 – Trading Standards
(Grade 10)
Neville Brown
Expertise & Service Lead 1 – Trading Standards
(Grade 10)
Clover Taylor
Regulatory Officer 2 (Animal Health)
(Grade 8)
Kim McGarva
Public Protection Officer
(Grade 5)
Kellie Farnham
Public Protection Officer
(Grade 5)
Fiona Moffatt (0.6)
+ (0.4 FTC Grade 6 to 31.03.27)
Public Protection Apprentice

Appendix 2

Demands on the Feed and Food Service

Number of Food Businesses registered in BANES

Risk Category	Current figures
A	4
B	99
C	426
D	645
E	713
Unrated	70
TOTAL	**1956**

Number of Feed Premises (current figures)

Premises type	Number
Compound feed manufacturer	1
Pet food manufacturer	4
Surplus food supplier	21
Transporters	8
Co-product producers	4
On farm mixers	12
Livestock Farms	477
Arable Farms	8
High risk primary producers	9

Number of Approved Premises (current figures)

Premises Type	Number of Approved Premises
Dairy Producers	6
Cold store	2

Food Hygiene Service Requests

Service request type			
	23/24	24/25	25/26 (up to 9th March 2026)
Allergy advice	5	6	4

Extraneous matter (foreign body)	12	14	8
Food alerts	12	4	5
Food hygiene rating activity	39	50	39
Food related illness	71	82	46
Freedom of Information Act	9	18	23
Health Promotion Education	0	0	0
Hygiene	29	31	12
Hygiene - handling procedures	26	33	29
Hygiene-Personnel	0	1	0
Hygiene - other	23	47	29
Hygiene - temperature requirements	0	0	0
Hygiene Advice	83	69	58
Hygiene-conditions of premises/equipment	46	46	46
Miscellaneous Food Complaint	5	0	10
New premises advice	31	26	20
Odour/Fumes	0	0	0
Out of condition	0	6	1
Out of date	1	0	2
Primary Authority activity	2	2	0
Registration	15	15	19
Safer Food Better Business advice	7	11	8
Sampling	4	0	0
Special Events	75	98	92
TOTAL	**519**	**580**	**477 (to 9.3.26)**

Food Standards Service Requests

Service request type	2025/2026
Allergen complaints and business advice	15
Food labelling and composition complaints and business advice	56
Primary Authority advice	18
TOTAL	**82**

Other local factors that Impact on Service Delivery

There are five hospitals in the area, four of which come under the responsibility of local NHS Healthcare Trusts and one which is privately run. Each of these hospitals are regarded as High Risk food premises; a consequence of their vulnerable clients and the catering methods employed.

In a normal year a range of events are held throughout which features a large number and variety of mobile caterers - majority of which originate from outside the authority. Remote checks are carried out on the listed caterers for each event, which are notified to us by the Events team's EventApp software. These including checking caterers are registered and if they have been inspected by their home authority, and what Food Hygiene Rating they have. Visits to an event may be undertaken and can include inspections of caterers, and lower risk food retail stalls as necessary. Issues found may be followed up and referred back to the business' home authority.

The Bath Christmas Market is normally the largest event of the year in the authority. Visits will be carried out by the Food Safety and Trading Standards officers as well as other teams forming part of the Safety Advisory Group for Events (e.g. Licensing).

Control and Investigation of outbreaks and food related infectious disease

Disease type	23/24	24/25	25/26 (current figures)
Campylobacter	146	260	240
Clostridium perfringens	0	1	0
Cryptoparvum	0	1	0
Cryptosporidium	21	4	18
Cyclospora	0	6	0
Dysentery Bacillary (Shigella)	1	0	3
E.COLI 0157	4	3	5
Escherichia coli Enteritis	0	3	2
Gastroenteritis Virus & Unknown Aetiology*	1	0	5
Giardia	21	22	28
Hepatitis	1	0	1
Legionnaire's Disease	1	2	0
Listeriosis	0	0	1
Salmonella	30	30	26
Total	**226**	**352**	**329 (to 9.3.26)**

** This total refers to suspected food poisoning notified by UKHSA, and does not include consumer complaints of alleged food poisoning from a business.*

Appendix 4

Performance in 2025/26

Hygiene Interventions Completed 2025/26

Risk Rating	Inspections completed (up to. 9th March 2026)
A	3
B	71
C	256
D	198
E	185
Unrated	279
TOTAL	**992**

Food Standards Interventions completed based on the new Food Standards Delivery Model 2025/26

Number of food inspections	728

FSA Feed Programme Inspections completed 2025/26

Number of feed inspections	10

Approved Premises Inspected

Type of Approved premises	Number of premises as of 1/4/ 2025	Approved Premises closed in year	New Approvals made in year	Total Number of Due Interventions carried out between 1/4/2025 and 09/03/2026	Total number of approved premises as of 1/4/2026
Dairy	6	0	0	2	6
Cold Store	2	0	0	0	2

Food Hygiene Microbiological Samples taken in 2025/26 (Up to 9.3.26)

52 food Samples or swabs were taken at food premises to check microbiological compliance

Food Standards Sampling in 2025/26

13 samples were taken in 2025/2026 and these were all related to our allergen work. 6 were found to be unsatisfactory requiring follow up work and 1 matter proceeding to prosecution.

Appendix 5

Staff Capacity for Hygiene Interventions - 2026/27

Officer	(IC)	(KT)	(HO)	(MB)	(vacant post)	(JP)	
Number of working days /week	5 (1 FTE)	3 (0.6 FTE)	3.0 (0.6 FTE)	5 (1 FTE)	5 (1 FTE)	5 (1 FTE)	Total 5.2 FTE
Training Day	0	0	0	0	0	0	
Duty day	1	0	1	1	1	1	
Days available for inspections	4	3	2	4	4	4	
inspections per week	4	3	2	5	5	6	
Inspections per month	16	12	8	20	20	24	
Inspections PA (based on 40 weeks PA availability to do inspections, taking into account leave, training, duty etc)	160	120	80	200	200	240	Total = 1000 inspections PA (if vacancy filled)

Appendix 6

Food Hygiene Inspection Targets for 2026/27

Risk Category	Total Due by 31/3/2027
A	4
B	99
C	304
D	384
E	204
Unrated	8
TOTAL	1003

Number of food standards inspections due in 2026/2027	**573**

The database automatically calculates a next visit date based on the risk score allocated during the previous inspection

Number of funded feed inspections due in 2026/2027	**10**
Number of funded hygiene primary production inspections due in 2026/2027	**4**