



Walsall Council

Food Law Enforcement Service Plan 2022-23

CONTENTS

1.0 AIMS AND OBJECTIVES OF THE FOOD SERVICE

- 1.1 Aims of the Food Service
- 1.2 Objectives of the Food Service
- 1.3 Links to Corporate Objectives and Plans

2.0 BACKGROUND

- 2.1 Profile of Walsall MBC
- 2.2 Organisational Structure
- 2.3 Scope of the Food Service
- 2.4 Demands on the Food Service
- 2.5 Enforcement Policies

3.0 SERVICE DELIVERY

- 3.1 Interventions at Food and Establishments
- 3.2 Food Hygiene Complaints
- 3.3 Home Authority Principle and Primary Authority Scheme
- 3.4 Advice to Businesses
- 3.5 Food Sampling
- 3.6 Control & Investigation of Food Related Infectious Disease
- 3.7 Food Safety Incidents
- 3.8 Liaison with other Organisations
- 3.9 Food Safety and Standards Promotional Work

4.0 RESOURCES

- 4.1 Financial Allocation
- 4.2 Staffing Allocation
- 4.3 Staff Development Plan

5.0 QUALITY ASSESSMENT

- 5.1 Quality Assessment and Internal Monitoring

6.0 REVIEW

- 6.1 Review against the Service Plan
- 6.2 Identification of any Variation from the Service Plan
- 6.3 Areas of Improvement

1.0 AIMS AND OBJECTIVES OF THE FOOD SERVICE

1.1 Aims of the Food Service

- To protect the public health from preventable food and water borne disease.
- To protect public health from contaminated food and undeclared allergens, ensure the integrity of food quality, labelling and compositional standards and to protect consumers from food fraud, food substitution and adulteration.
- To carry out the Food Standard Agency (FSA) Animal Feed Delivery Programme
- To promote and implement key aspects of the Public Health agenda
- To comply with the FSA Framework Agreement and relevant codes of practice.
- To have regard to the Regulation Policy when considering enforcement action
- To support those we regulate comply and grow.

1.2 Objectives of the Food Service

- To carry out a programme of interventions at food premises allocating resources to those premises posing the most significant risk.
- To assist new or existing businesses through frontline advice or Home or Primary Authority schemes to achieve compliance.
- To publish food hygiene ratings so consumers can make informed choices and businesses are encouraged to invest in raising standards and become profitable.
- Use intelligence to ensure that food particularly imported food offered or exposed for sale is fit for human consumption and to expedite the removal of hazardous products from the food chain.
- To investigate cases of food poisoning and tackle practices and processes identified as sources of infection.
- To investigate complaints relating to food and food premises and take appropriate, timely and where necessary robust enforcement action.

- To undertake a microbiological sampling programme proactively at manufacturing premises and where necessary in connection with outbreaks of disease or service requests.
- To undertake a sampling programme to ensure that food complies with legal standards relating to presentation, labelling and advertising, compositional standards and the absence of non-permitted or excessive levels of additives, contaminants and residues.
- To undertake an animal feed delivery programme in line with FSA requirements.

1.3 Links to Corporate Objectives and Plans

The Council has a Council Plan for 2022/25, which sets out the Council's ambitions for the next three years. It sets out outcomes and explains how progress towards their achievement will be measured. The Plan is aligned to the Council's four-year Budget Plan and has the following key areas of focus:

Economic - Enable greater local opportunities for all people, communities and businesses

People - Encourage our residents to lead more active, fulfilling and independent lives to maintain or improve their health and wellbeing

Internal focus - Council services are customer focused effective, efficient and equitable

Children - Have the best possible start and are safe from harm, happy, healthy and learning well

Communities - Empower our communities so that they feel they are connected and belong in Walsall, creating safe and healthy places whilst building a strong sense of community

The plan can be viewed via the following link:

<https://go.walsall.gov.uk/corporate-plan>

The Strategic Priorities and the ways in which Environmental Health and Trading Standards contribute to them are:

Economic - Enable greater local opportunities for all people, communities and businesses

- Our work supports new and existing businesses to not only survive but thrive despite difficult economic conditions.

- Our work gives consumers confidence when shopping in Walsall
- Our work continues to introduce competition into regulatory standards through the National Food Hygiene Rating Scheme, empowering residents to choose which business should receive their custom
- We confront those businesses or individuals who seek to gain an unfair advantage over competitors by not complying with regulations thereby putting their staff and customers at risk.

People - Encourage our residents to lead more active, fulfilling and independent lives to maintain or improve their health and wellbeing

- Ensuring that unsafe practices and foodstuffs are identified and robustly tackled to ensure the health of the public is protected therefore preventing ill health that places a negative burden on the economy and the lives of people.
- To use the skills and opportunities available to the service to promote and implement key aspects of the Health and Well Being Strategy for example through Healthy Workplace Awards, Making Every Contact Count and tobacco control/smoking cessation projects.
- To prevent outbreaks of communicable disease and where such disease outbreaks take place using the statutory powers available to control and stop their spread as well as bringing to justice those who may be responsible.

Internal Focus – Council services are customer focused effective, efficient and equitable

We will work with internal partners to give advice and expertise in relation to those matters that fall within our area of expertise. This could be as being a member of the Safety Advisory Group, Health Protection Forum, Training Forum, Directorate Health and Safety Committee, Exploitation Delivery Group, Transformation Groups and Walsall Proud Programme etc.

Children - Have the best possible start and are safe from harm, happy, healthy and learning well

- The work we undertake has a bearing on the health of children, premises that deal exclusively with children such as schools and nurseries are at

present given a higher risk rating score because of the vulnerability or age of the children. Complaints and infectious disease incidents involving children would also receive a higher degree of response or scrutiny on the basis of a potential higher impact on their lives.

Communities - Empower our communities so that they feel they are connected and belong in Walsall, creating safe and healthy places whilst building a strong sense of community

- Food businesses are often at the centre of each community and their success and regulatory compliance can have a beneficial impact on communities. Likewise poorly run premises with overflowing bins, noisy equipment, late opening and badly prepared food can have a detrimental impact on the image or self-esteem of communities. Our services will therefore focus regulatory activity against those businesses having such a detrimental impact on communities.

2.0 BACKGROUND

2.1 Profile of Walsall MBC

Walsall is a unitary authority in the West Midlands region and has an estimated population of 286,700 (ONS 2020 Mid-Year Estimates). Whilst the Borough is predominantly urban, it does have significant areas of open space mainly in the east. Along with Sandwell, Dudley and Wolverhampton, Walsall forms part of the Black Country sub region, which was, designated a Local Enterprise Partnership in 2010.

Walsall lies at the heart of the national road and rail networks with the M6, M6 toll, M5 and M54 all running through or close to the Borough. Rail and bus routes feed into national networks meaning 5 million people are within 45 minutes of Walsall by public transport. (*Walsall Borough Local Economic Assessment, V1 July 2011*)

Walsall town centre is the strategic and economic centre of the borough, but there are also five key district centres: Aldridge, Bloxwich, Brownhills, Darlaston and Willenhall. All of these have distinct histories and identities and are important retail hubs serving their local communities.

Four out of five businesses surveyed serve clients locally in Walsall and around two in three serve the Black Country or West Midlands. Over 60% of businesses have customers in the rest of the UK and over 30% have customers overseas. Only a third of sales are outside the region meaning Walsall Companies are very reliant on the local economy. Over half of working residents are employed in the borough and it is estimated around 4.7% of the Boroughs residents are employed in the food and accommodation sectors. Walsall has a variety of manufacturing and service industries and is an operational base for a number of food wholesalers. There are also several companies producing a variety of food products which are distributed throughout the UK. (*Walsall Borough Local Economic Assessment, V1 July 2011*)

The 2019 Index of Multiple Deprivation ranks Walsall as the 25th most deprived English local authority (out of 317), placing Walsall within the most deprived 10% of districts in the country. The labour market profile for claimants in Walsall show that 7% of the working population claim out of work benefits. (<https://www.walsallintelligence.org.uk/home/demographics/deprivation/>)
<https://www.nomisweb.co.uk/reports/lmp/la/1946157191/report.aspx#tabidbr>

The Borough is ethnically diverse and people of Indian, Pakistani and Bangladeshi background form the largest minority ethnic groups with 23.1% of Walsall's inhabitants coming from minority ethnic communities. In some wards, up to 70% of the population are from BME groups. Many people in these communities either own, or are employed in small food businesses. The number of non-UK born residents in Walsall increased by 3.7% (or 9,900 people) between the 2001 and 2011 censuses (see chart below) and Walsall now has a small Eastern European population who make up about 1% of the area residents (2,700 people in total).

<https://www.walsallintelligence.org.uk/home/demographics/diversity/>)

In the past decade there has been a rapid change in the eating habits of the UK population with there being a considerable growth in the consumption of food from outside of the home. (*Rand Europe – Food Consumption in the UK 2020*) Studies have found that takeaway food outlets are often located in areas of higher socio-economic deprivation and that there is a strong association between deprivation and the density of fast food outlets, with more deprived areas having more fast food outlets per 100,000 population. (*Public Health England - Using the planning system to promote healthy weight environments, 2020*) There is also evidence that adults with lower income tend to consume more takeaway meals eaten at home , compared to those with higher income and that there is an evident health inequality (*Rand Europe – Food Consumption in the UK 2020*)

The food service plays an important role in bridging the link between health and economy by protecting and improving the health of residents whilst also having regard to the economic prosperity of the business sector.

2.2 Organisational Structure

The Framework Agreement on Official Feed and Food Controls by Local Authorities provides the Food Standards Agency with a mechanism for implementing its powers under the Food Standards Act to influence and oversee local authority enforcement activity. The Food Safety Act 1990 states that every food authority shall enforce and execute within their area the provisions of this Act with respect to which the duty is not imposed expressly or by necessary implication on some other authority.

Walsall Council's constitution, Part 2, Article 4.01 (a)(ii) lists the Food Law Enforcement Service Plan as a plan or strategy that must be approved by full Council before it can become operational. This Plan will therefore be

submitted on an annual basis to Cabinet with a recommendation that it is sent to full Council for approval and adoption

The Director of Resilient Communities may authorise members of staff to act on behalf of the Council and to enforce and administer relevant legislation. They are also authorised to appoint or recommend for appointment:

- Lead Officers for Food (Safety and Standards)
- The Chief and Deputy Chief Inspector of Weights and Measures
- An Inspector to institute legal proceedings in respect of the Health and Safety at Work etc. Act 1974
- Public Analyst for the purpose of Section 27 of the Food Safety Act 1990

The **Head of Community Safety and Enforcement** is responsible for:

1. Managing Environmental Health, Trading Standards and Licensing with respect to enforcing relevant legislative requirements.
2. Acting as a Lead Officer for the Food Safety Act and its codes of practice.
3. To authorise enforcement action including, the institution of legal proceedings, serving of legal notices and the issuing, suspension and revocation of licences and permits.
4. To ensure the service operates and performs in line with its various statutory responsibilities and that evidence of performance is submitted to Central Government for oversight in a timely fashion upon request.

The Team Leader Environmental Health and Team Leader Trading Standards are responsible for delivery of their respective services in line with current corporate, regional and national priorities.

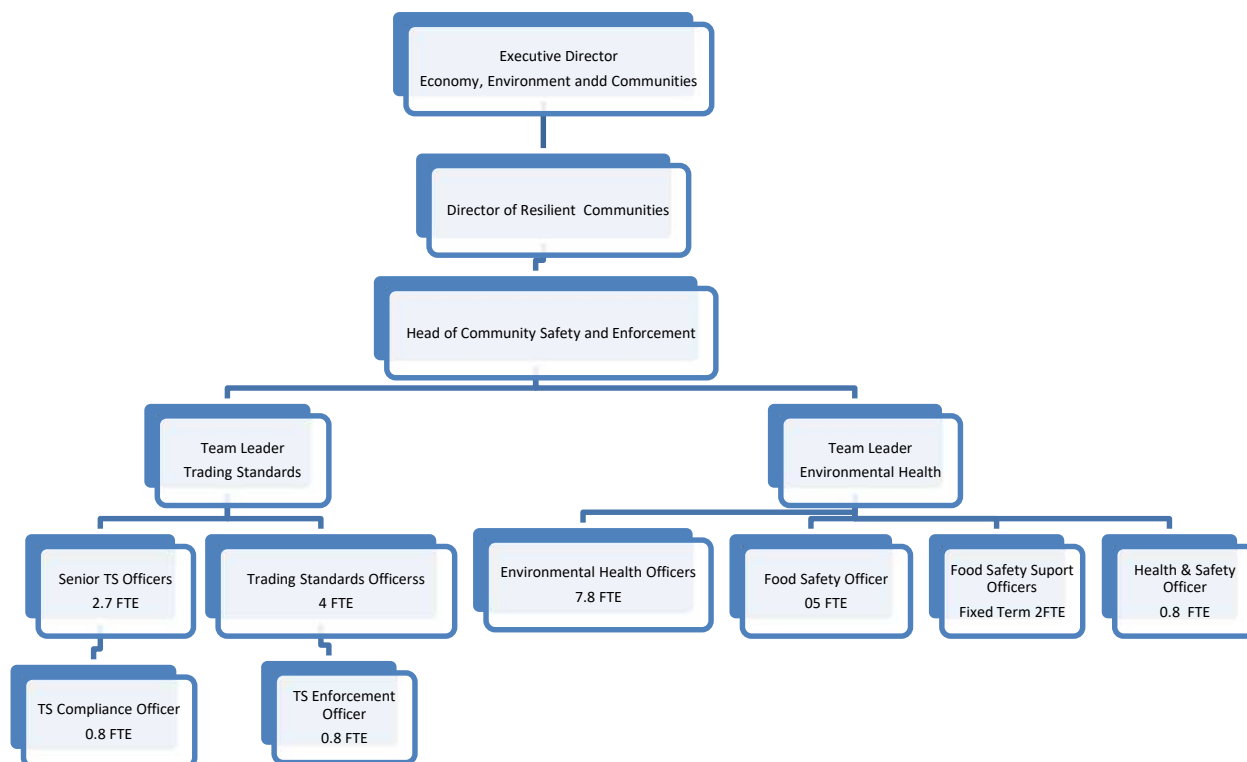
Presently there are 11 Environmental Health posts 10 require a qualification to undertake food safety duties of which 5.7 FTE's work predominantly on Food Safety, 2.02 FTE's work on Health and Safety related matters the remaining 2.31 FTE's work on animal licensing, nuisance, licensing and other regulatory activity.

There are presently 4.7 FTE trading standards officers qualified to undertake food standards duties alongside their other trading standards work of which approximately 1.5 FTE officer time is spent enforcing food standards.

Environmental Health use the UK Health Security Agency Food, Water and Environmental Microbiology Laboratory, London for any samples taken.

Trading Standards use Public Analyst Scientific Services (PASS) based in Wolverhampton for compositional analysis of food samples

2.2 Structure of Service and Contact Details



Delivery of the Food Service	
Service Delivery Point	Civic Centre, Darwall Street, Walsall, WS1 1TP.
Hours of Opening	Monday to Thursday 8.45am to 5.15pm Friday 8.45pm to 4.45pm
Telephone numbers	EH 01922 653366 TS 0845 330 3313 Out of Hours 01922 650000
E mail	environmentalhealth@walsall.gov.uk trading_standards@walsall.gov.uk
Website	www.walsall.gov.uk
Social Media	www.facebook.com/makemeasavvyshopper www.facebook.com/safeandsoundaroundtown Twitter: @ehwalsall @savvyshopper

3. Scope of the Food Service

The enforcement of food related legislation is a joint responsibility between Environmental Health and Trading Standards: All services are provided by officers employed by Walsall Council.

Environmental Health provide the following services relating to Food:

1. Food safety/hygiene inspections.
2. Infectious disease investigations (food poisoning and water borne disease).
3. Microbiological food sampling.
4. Food safety advice to new and existing businesses including promotional and educational activities.
5. Food and food hygiene complaint investigations.
6. Private drinking water supply - monitoring and assessment.
7. Operation of the National Food Hygiene Rating Scheme.
8. Commercial complaints in respect of odour, noise, waste & drainage.
9. A statutory consultee in the respect of planning.
10. A Responsible Authority in terms of licence applications.
11. Export Certificates for food and interventions relating to Imported Foods.
12. Core member of Walsall Council Safety Advisory Group.

Trading Standards provide the following services relating to Food:

1. Food Standards inspections.
2. Feed Hygiene Inspections.
3. The investigation of complaints in relation to food fraud, labelling, contamination and composition.
4. Food sampling for compositional, nutritional and labelling conformity.
5. Food Standards advice to business.
6. Food Standards education to consumers.
7. Import certificates for food & interventions relating to imported foods.
8. A Responsible Authority in terms of licence applications.
9. Underage sales of alcohol and tobacco.

Licensing regulate the following Food related matters:

1. Late Night Refreshment Licences.
2. Street Trading Licences and Consents.
3. Personal and Premises Licences for Alcohol.

2.4 Demands on the Food Service

A profile of the 2318 food businesses registered with Walsall Council is as follows:

FSA CODE	PREMISES TYPE	NO. OF PREMISES
A	Primary Producer	27
C	Manufacturer and Packer	29
E	Importer/exporter	2
F	Distributors/transporters	44
G01	Supermarket/hypermarket	42
G02	Small retailer	420
G03	Other retailer	84
H01	Restaurant/cafe/canteen	287
H02	Hotel guest house	10
H03	Pub/club	187
H04	Takeaway	312
H05	Caring premises	137
H06	School/college	125
H07	Mobile unit	109
H08	Restaurant/caterer other	311
	Total	2318

There are 20 premises approved by the local authority to produce products of animal origin for distribution throughout the UK and Europe. There are no red meat slaughterhouses in the borough. There is one small-scale Halal poultry slaughterer that is regulated by the Food Standards Agency.

There are 33 agricultural feeding-stuff (animal feed) establishments registered under the EU Feed Hygiene Regulation (183/2005) with the following breakdown of registration activities:

R6	Manufacture of pet foods	2 establishments
R7	Manufacture and/ or placing on the market of feed materials	20 establishments
R11	Mixing feed on-farm, with compound feedingstuffs which contains additives	1 establishment
R12	Food businesses selling co-products of the food industry which are destined as feed materials	2 establishments
R13	Livestock farms which do not mix feeds or mix feeds without additives	7 establishments
R14	Arable farms growing or selling crops for feed	1 establishment

Walsall as a Borough has a significant number of premises where English is not the primary language spoken by many of the staff. Within certain sectors of the food industry there also tends to be a relatively high turnover of Food Business Operators meaning officers may not see the same person twice when carrying out visits. This is not conducive to building long-term positive relationships where compliance can be improved with mutual cooperation.

Many food premises are opened in buildings not originally designed for such a purpose and therefore do not allow easy or economically viable compliance with the structural elements of food hygiene.

2.5 Regulation Policy

The Regulatory Services Enforcement Policy was approved by Cabinet on the 25th April 2018 it is available at this link <https://tinyurl.com/yb39zvt6>

3.0 SERVICE DELIVERY

3.1 Interventions at Food Establishments

Interventions are defined as activities designed to monitor, support and increase food law compliance within a food establishment. Interventions also include activities that are effective in supporting food businesses to achieve compliance, such as targeted education and advice or information and intelligence gathering.

The FSA considers that an intervention programme is central to a local regulatory and enforcement regime, and local authorities must ensure that such a programme is appropriately resourced.

Trading Standards Food Standards Interventions.

Food Standards interventions are applied in accordance with the Intelligence Operating Model, in a risk-based intelligence-led manner, so that resources are effectively targeted and directed at those businesses that present the greatest risk.

Interventions will also be based upon and result from the national, regional and local sampling programmes that we contribute to. A flexible approach to resourcing enables the service to respond appropriately to incidents and to ensure the necessary protection to the Borough's food chain. Additionally under the FSA's post Covid Recovery Plan all premises identified as high risk will receive an intervention.

Environmental Health Food Hygiene Interventions Risk-based Interventions

During 2019–21, Environmental Health and Trading Standards Officers formed the backbone of the regulatory response to the Covid pandemic response at a local level. Staff who did not form part of the local Covid response were restricted in the range of duties they could perform due to closure of large parts of the economy.

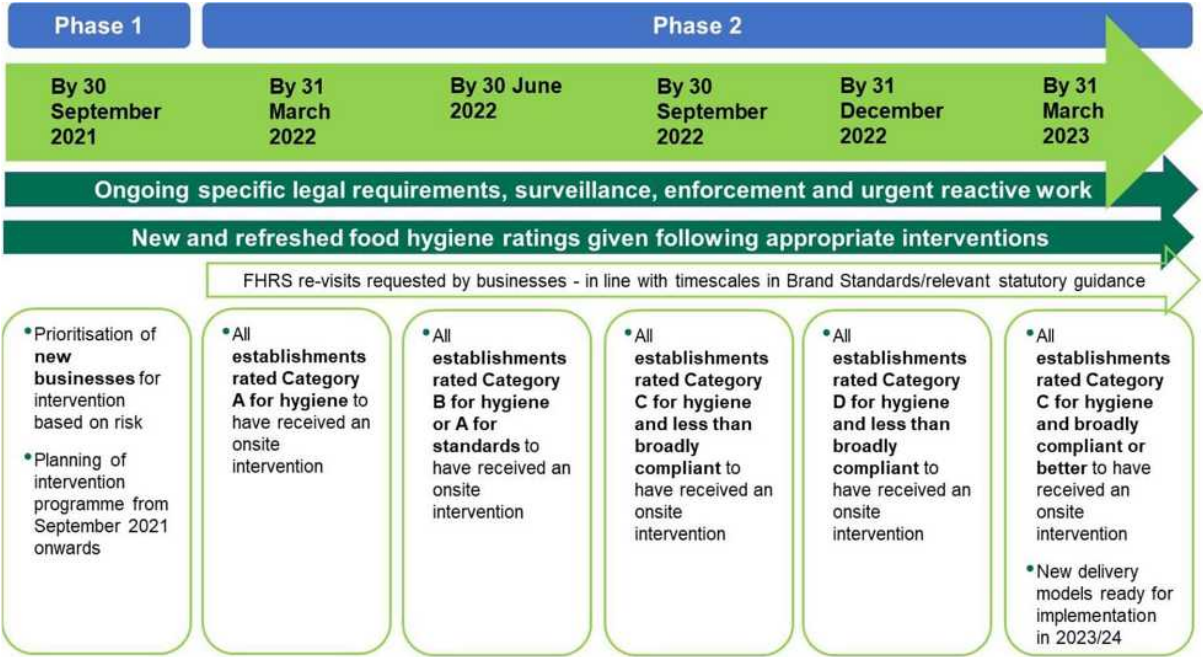
In recognition of the above the Food Standards Agency (FSA) allowed local authorities to depart from their normal statutory food hygiene intervention programmes which are based on the intervention rating scheme in the Food Law Code of Practice (the Code). Normally, the FSA requires local authorities to conduct interventions accordance with frequencies shown in the table below.

Category	Score	Minimum intervention frequency
A	92 or higher	At least every 6 months
B	72 to 91	At least every 12 months
C	52 to 71	At least every 18 months
D	31 to 51	At least every 24 months
E	0 to 30	A programme of Alternative Enforcement Strategies or interventions every three years

Recovery Plan

The Food Standards Agency produced a Recovery Plan for Local Authorities requiring local authorities to re-start their food hygiene intervention programmes following the restrictions of the Covid pandemic. An outline of the plan is shown in Figure 1 below. It sets out priority areas of work for response and action. The Recovery Plan sets dates for the completion of certain activities during 2022/23. In a letter to the Chief Executives of all local authorities, the FSA also stated that planned interventions and activities specified in the Recovery Plan are the minimum that local authorities need to undertake to fulfil their statutory duties in relation to food.

Figure 1 – Outline of Recovery Plan



The breakdown of the type of new food businesses awaiting an initial inspection are shown in Table 2. There is a substantial number of restaurants, takeaways and small retailers which are likely to be identified as a high priority for inspection. Consequently, these would increase the pressure on the service during Phase 2 when local the authority must implement an ongoing programme of inspections of unrated businesses alongside a programme of planned routine interventions for established businesses.

Table 2 – Businesses Awaiting Inspection

Businesses Awaiting Inspection (27th September 2022)	
Small Retailer	33
Mobile Food Unit	30
Restaurant/Cafe/Canteen	38
Take-Away	28
Pub/Club	7
Caring Premises	6
Restaurant/Caterer - Others	128
Distributors/Transporters	8
School/College	3
Retailer - Other	3
Manufacturers and Packers	2

Phase 2 of the Recovery Plan

Phase 2 of the Recovery Plan has set deadlines, covering 2022/23, for the local authority to complete on-site interventions for all establishments rated A, B, C (less than Broadly Compliant), D (less than Broadly Compliant) and C (Broadly Compliant). Table 1 shows the number of establishments according to category rating and details the visits due as per the Recovery Plan.

Table 1 also shows the number of unrated businesses awaiting an initial onsite inspection, which will be subject to a programme of prioritised inspections. It should also be noted that during 2022/23 an average of 300 new food businesses are expected to register thereby increasing the number of unrated businesses requiring an initial inspection during this period.

Table 1 – Establishments by Rating Category/Unrated Establishments

Category	By end of March 22	By end of June 22	By end of September 22	By end of December 22	By end of March 23
A	2				
B		19			
C (0-2)			32		
C (3-5)					427
D (0-2)				30	
D(3-5)					
E					
Unrated	263				

Complaints and Enquiries

In addition to the implementation of the Recovery Plan the service will respond to food related complaints and enquiries concerning food, food borne diseases, premises and practices during 2022/23. Based on an average calculated from the number of complaints and enquiries received during the periods 2020/21 and 2021/22 approximately 315 can be expected to be received during 2022/23.

Prioritisation

Should a situation occur whereby demand outstrips staffing levels our priority will be matters of highest risk to ensure the greatest level of protection to the public. These matters include:

- an unsafe practice is occurs which represents a significant hazard to health;
- a particular food handling or food preparation practice is found to entail a previously unsuspected hazard to public health;
- a foodstuff previously thought to be safe is found to be hazardous to health;
- a food with widespread distribution is found to be contaminated and thereby presents a significant hazard to public health;
- widely distributed foodstuff is the subject of fraud in labelling or presentation
- Notifications of single cases of significant infectious disease e.g. E coli 0157
- Outbreaks of infectious disease of any type

Consequently, this would have an adverse impact on lower risk work and would necessitate the development of a secondary strategy to deal with the backlog of work arising from the realignment of priorities. This could include:

- Lesser qualified Officers making a first response
- Qualified agency staff brought in on a temporary basis
- Response by phone/letter/email only
- Signposting to other agencies or legal advisors.

Walsall Council implemented the Food Hygiene Rating Scheme on the 1st April 2011: It is encouraging to see that the proportion of businesses that are ranked “Broadly Compliant” (scoring 3, 4 or 5) has generally increased year upon year, despite the continued financial pressure on businesses.

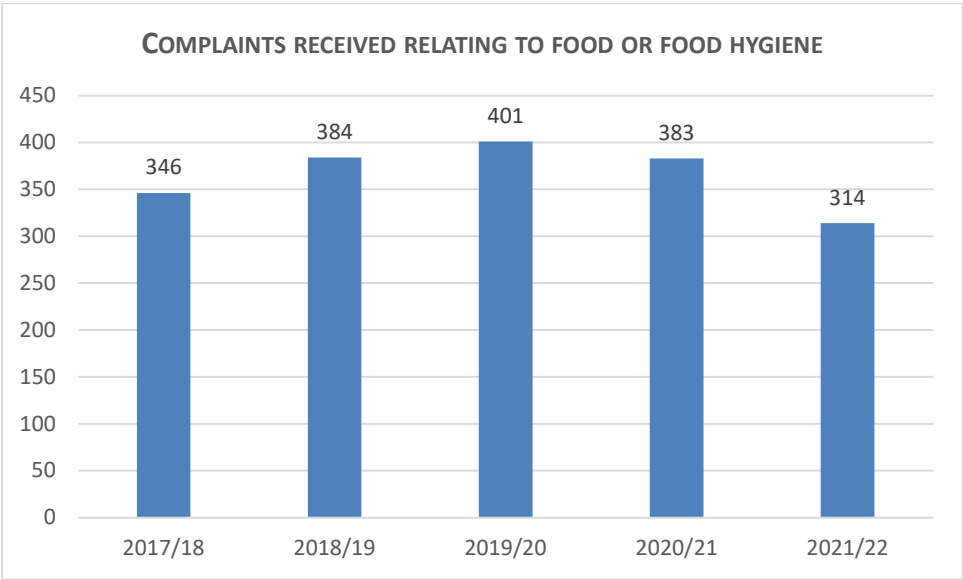
Rating	Number of Businesses								
	April 2013	April 2014	April 2015	April 2016	April 2017	April 2018	April 2019	April 2021	April 2022
5 (Very Good)	328	373	585	565	679	725	751	785	768
4 (Good)	308	349	347	368	390	355	349	372	358
3 (Generally Satisfactory)	336	353	321	306	295	298	307	294	292
2 (Improvement Necessary)	130	121	98	91	91	89	67	51	58
1 (Major Improvement Necessary)	180	149	153	153	118	84	75	54	57
0 (Urgent Improvement Necessary)	10	8	15	11	8	8	4	1	0
% achieving satisfactory ratings	75.2	79.5	81	83	86.5	88.4	90.6	92.9	92.5

There are 1958 businesses are recorded on the FHRS, 1533 are rated the other 425 being at present exempt, excluded, sensitive or awaiting inspection. Taking 3 and above as satisfactory then 92.5% of rated Walsall Businesses are at least satisfactory with 7.5% requiring varying levels of improvement. Staff are trained in the consistent rating of food premises having attended a number of FSA training sessions relating to this area. The results are therefore an honest reflection of the situation within the Borough.

3.2 Food Complaints

Complaints are prioritised on the basis of the nature and severity of the matter reported. Many complaints relate to dissatisfaction with the condition of food and often fail because the continuity of evidence has been broken i.e. it is possible the contamination entered the food after opening. To allow staff to focus on areas of highest priority information will be made available to complainants on actions they may be able to take to resolve low risk complaints.

Environmental Health received 383 complaints relating to the condition of food and concerns over food practices or the hygiene of food premises in 2020/21 and 314 in 2021/22.



Trading Standards received 92 food and drink related complaints in 2021/22 and 140 in 2022/23 relating to out of date, food fraud, improperly described, contaminated and incorrectly labelled food.

3.3 HOME AUTHORITY PRINCIPLE AND PRIMARY AUTHORITY SCHEME

PRIMARY AUTHORITY

The Primary Authority Principle has its basis in law and is a government priority. The authority is permitted to recover its costs for advice given under the scheme and if the business follows the “assured advice” then enforcement action such as a prosecution by other authorities is not likely to be successful. On the 2nd July 2014 Cabinet approved the adoption and charging regime for this scheme. To date no Primary Authority partnerships have been signed up to.

Home Authority Principle

This principle was developed as an aid to good enforcement practice and aims to:

- Encourage Authorities to place special emphasis on goods and services originating within their area.
- Provide businesses with a Home Authority source of guidance and advice.
- Support efficient liaison between Local Authorities.
- Provide a system for the resolution of problems and disputes.

The principle has the support of local authorities, Government, trade and industry associations, consumer and professional regulatory bodies.

3.4 Advice to Business

The authority has always provided appropriate and competent advice, to local businesses and residents, within available resource constraints.

In recent times there has been an increase in the number of people wanting to prepare food for sale in their domestic kitchens. Officers recognise that certain low risk food items such as cakes can be prepared in a domestic kitchen and a number of factsheets for domestic caterers have been produced.

The services website has been made easier to use, with information about setting up a food business and application forms that businesses and members of the public can download free of charge. Additional work is needed to update and amend older information in line with proposals set out in Walsall Councils Proud Programme work streams.

Where possible advice is given to businesses before they commence trading. It is easier to give advice on layout, equipment and practices at the planning stage before a business commences trading. Under the FHRS, a business that does not have a fully implemented Food Safety Management System cannot score higher than 1 (Major Improvement Necessary) so where time permits, officers carry out coaching visits to Food Business Operators to ensure they understand the importance of this requirement.

The Environmental Health twitter account @EHWalsall has 986 followers and over 6,162 messages have been 'tweeted'.

The Trading Standards Twitter account @Savvyshopper6 has 545 followers and has tweeted over 2600 messages with 104500 impressions.

We will continue to use social media for communicating food safety, trading standards, infectious disease and health and safety messages. The Tweets are made by officers and managers within the team and are regularly retweeted by other councils, businesses and members of the public.

3.5 Food Sampling

Microbiological Food Sampling

Microbiological food sampling is carried out to meet four main objectives:

- To determine the current state of food safety in the Borough
- To improve the effectiveness of food hygiene inspections.
- To investigate suspect cases of food poisoning linked with local businesses.
- To investigate complaints about food.

Microbiological examinations will be carried out using credits allocated by Public Health (England). Samples will be taken by qualified staff.

Sampling Programme 2021/22 Manufacturers selling mainly by retail.

No food sampling has been undertaken during the period of restrictions due to COVID19. The situation will be reviewed for the financial year 2022/23 and should sufficient capacity be available to carry our proactive sampling this will be implemented otherwise the service will continue with reactive sampling in response to specific issues.

Should an outbreak of food borne disease or some major issue be identified at a manufacturer or other food business Officers will undertake relevant reactive sampling.

Food Sampling (Food Standards)

The Trading Standards Service targets its proactive sampling at locally produced foods, those products/ingredients from companies that manufacture in, are based in, or import into Walsall. In addition, foods are targeted which are causing current concerns. These are identified through communication with the Food Standards Agency, the National Food Crime Unit, the Department of the Environment, Food and Rural Affairs and the European Commission; through local, regional and national intelligence held by local authorities; and through consultation with the Public Analyst.

Emerging food fraud risks can also be identified by looking at economic drivers: High value/high volume products, products in short supply; products with rising prices; products with a complex global food chain. Looking at some of these factors gives us a chance of identifying the next 'horsegate'.



All sampling undertaken by officers is in accordance with relevant legislation and all formal food and animal feed samples are taken in accordance with the relevant Food or Feed Law Codes of Practice.

Samples are analysed and/or examined by the Service's Public/Agriculture Analyst appointed in accordance with the procedures laid down in Regulations and relevant Food and Feed Law Codes of Practice. Alternatively, some samples are examined/tested in house, if it is appropriate to do so.

Food Standards Sampling Projects 2020/21

The Trading Standards service took 38 samples during 2021/22 with 74% being analysed as unsatisfactory. This mainly related to the authenticity of Yellow Tale wine but also included issues with undeclared allergens, labelling and meat substitution. Investigations are ongoing with a number of these issues.

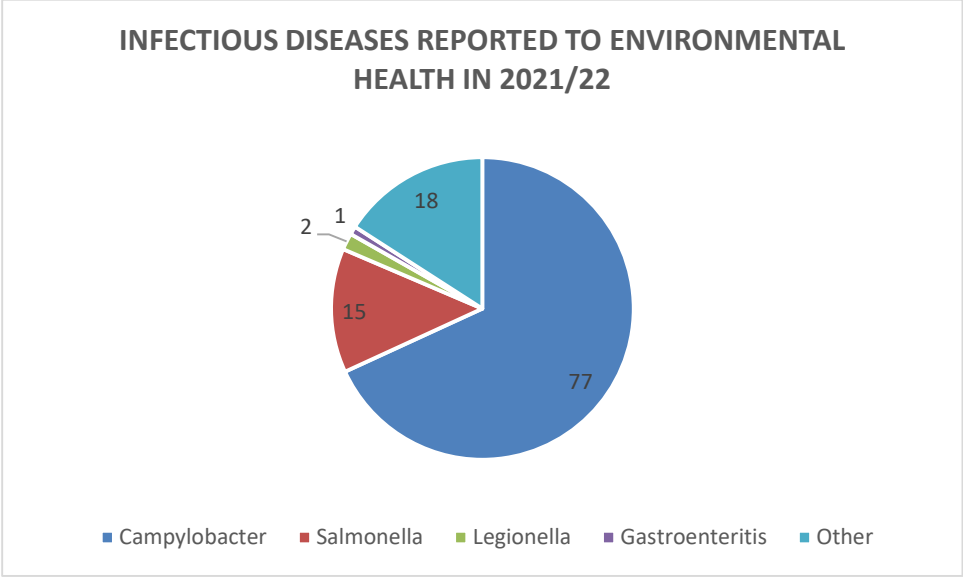
3.6 Control and Investigation of Food Related Infectious Disease

The UK Health Security Agency (UKHSA) is appointed to act as Proper Officer for Walsall Council in respect of infectious disease notifications. UKHSA notify Environmental Health of food poisoning cases in the Borough via secure electronic communication. Environmental Health have a statutory duty to carry out an investigation to ascertain the source of the illness and check to ensure that there is no risk of the illness spreading further.

Environmental Health staff work closely with colleagues in UKHSA and have powers to formally exclude people from work or school if they are classed as a high risk case and their actions place other people at risk of catching communicable disease.

Campylobacter remains the primary pathogen with 77 notified cases in the Borough in 2021/22. A breakdown of all notified cases of infectious diseases is shown in the pie chart below. During this period, the service also received allegations of food poisoning where people claim to have been ill but have not had a formal diagnosis. This led to an additional

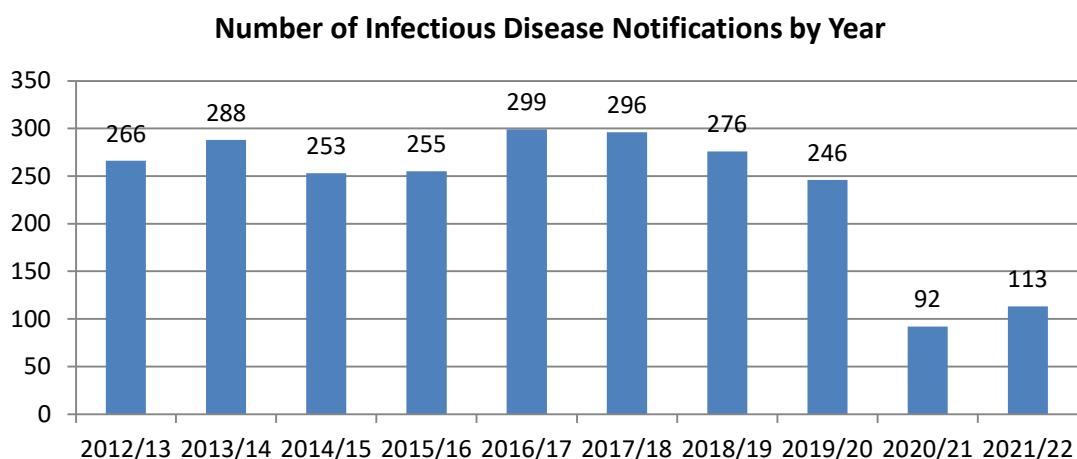
67 cases of potential food poisoning highlighting the large amount of undiagnosed food borne illness that may be present in society but not formally identified and recorded.



Responses to infectious disease notifications are measured against the PHE document - Roles and Responsibilities for Investigation of Gastrointestinal Infectious Diseases. Having no specific out of hour's duty staff for responding to infectious disease notifications does however pose a difficulty in dealing with emergency notifications i.e. those required within 24 hours.

This issue is currently addressed by invoking the Emergency Planning procedure of identifying and contacting relevant Senior Managers. The services response rate to infectious disease notifications which is agreed with Public Health England currently stands at 90%

In a large scale outbreak the Council could draft in staff from other services to assist in some of the basic duties. For additional resource from expert or qualified officers assistance may have to be requested from other West Midlands Councils through the Memorandum of Understanding that all 7 Councils have signed up to.



3.7 Food Safety Incidents

The Food Standards Agency issues information about product withdrawals and recalls to let consumers and local authorities know about problems associated with food. This information is issued electronically to Environmental Health and Trading Standards.

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

A Food Alert for Action is issued where enforcement by authorities is required. These notices and alerts are often issued in conjunction with a product withdrawal.

During 2021/22 Trading Standards instigated 2 food alerts and corresponding product withdrawals

3.8 Liaison with other organisations

The Authority works in partnership with the following organisations either on an ongoing basis or as the result of targeted work programmes:

1. Food Standards Agency (FSA)
2. UK Health Security Agency (UKHSA)
3. Director of Public Health
4. Eurofins – Public Analyst
5. Central England Trading Standards Authorities Management Board
6. Central England Environmental Health Management Board (CEEHMB)
7. Department of Health, DEFRA and the Animal and Plant Health Agency (APHA)

CEEHMB Food Liaison Group

This Group represents the seven West Midlands councils but is also linked by a coordinating board to Food Liaison Groups in Staffordshire and Shropshire, Warwickshire and Worcestershire. It aims to provide consistency of enforcement, acts as a facilitator for benchmarking activities and provides 'standardisation' exercises to facilitate consistency. It provides comments on consultations on behalf of the region and provides a valuable link between local authorities and the FSA.

CEntSA Food Standards Liaison Group

The above Group is made up of food standards lead officers plus the regional Public Analysts. Walsall's Food Standards Lead officer is Chair of this group and as such is responsible for leading on regional projects including sampling, guidance to business, legislative consultations and sharing best practice.

National Food Standards and Labelling Focus Group

Walsall's Food Standards Lead officer also sits on the National Food Standards and Labelling Focus Group, which gives guidance to regulators and industry as well as working with FSA, DEFRA and DoH on consultations and codes of practice.

Knowledge Hub

The Knowledge Hub is the LGA's professional network, which helps people in local government connect and share in a secure environment. It is used as a vital tool for sharing intelligence and best practice, both regionally and nationally.

Rapid Alert System for Food and Feed (RASFF) and the European Commission

This system provides EU food and feed authorities with an effective tool to exchange information about measures taken responding to serious risks. This exchange of information helps Member States to act more rapidly and in a coordinated manner in response to a health threat caused by food or feed. However, the EU-UK trade agreement does not provide the UK with access to the RASFF but it does ensure exchange of food safety information, which the FSA can then use as part of its incident detection and management system.

IDB and FSA Intelligence Databases

Intelligence on food issues is also collected by Trading Standards departments in the CEntSA region through the national Intelligence Database - IDB which also inputs into the

Food Standards Agency food fraud database. Data from IDB and the FSA database is used to produce a Regional Control Strategy.

Walsall Council Safety Advisory Group

A Representative from Environmental Health, Trading Standards and Licensing attends the Safety Advisory Group to provide advice and direction to event organisers so that events operate safely – food safety is a significant part of the application form and discussions at the meetings.

3.9 Food Safety and Standards Promotional Work

Social Media Campaigns

Environmental Health and Trading Standards use Social Media such as Twitter and Facebook to communicate current messages of local, regional or national importance. This can include checking Food Ratings, Food Alerts, safe summer food, BBQ's, picnic safety, Christmas food preparation etc.

Presentations

From time to time and where resources allow staff will carry out presentations to schools, colleges or other forums to promote the work of the service and the profession.

Trading Standards Business News.

CEnTSA publish a quarterly online business newsletter covering a range of regulatory articles. Walsall Environmental Health and Trading Standards are regularly contributors notably for food safety, allergens, food labelling and have also contributed to articles in relation to waste duty of care, licensing of events and pest control.

The articles can be found at <http://tsbn.org.uk/>.

Health Switch Award

The withdrawal of Public Health funding to support the delivery of the Health Switch Award by Environmental Health, in September 2022, resulted in the termination of the initiative. The scheme worked with hot food takeaways and looked at simple innovative ways to offer a healthier choice of food to Walsall residents in order to tackle obesity. The scheme consisted of Bronze, Silver and Gold awards. Whilst Health Switch was operational Officers worked with over 400 food businesses the majority of which received awards. The scheme also offered mentoring to businesses with a FHRS 3 ratings.

4.0 RESOURCES

4.1 FINANCIAL ALLOCATION

The table below shows the cost of Food Safety for 2019/20, 2020/21 and includes an estimate of its cost for 2022/2023.

	2019/20	2021/22	2022/23 Estimate
Staffing Costs	342,660	347,787	362,906
Support Services	0	0	0
Supplies and Services	24,672	13,818	18,479
Transport Costs	3,262	3,512	5,177
Income	-6,742	-9,241	-10,101
Expenditure	363,852	355,876	362,461

4.1 Staffing Allocation

Environmental Health and Trading Standards staff also undertake a great deal of work in relation to health and safety, animal health and welfare, skin piercing, public funerals, product safety, rogue trading, weights and measures, age restricted sales, counterfeiting etc.

The allocation below relates primarily to the food safety function.

The Team Leader Environmental Health and Team Leader Trading Standards are responsible for delivery of their respective services in line with current corporate, regional and national priorities.

Presently there are 11 Environmental Health posts 10 require a qualification to undertake food safety duties. The amount of resources dedicated to Food Safety equates to 5.7 FTE's, 2.02 FTE's work on Health and Safety related matters the remaining 2.31 FTE's work on animal licensing, nuisance, licensing and other regulatory activity.

Trading Standards is delivered in one Borough-wide team of 2.7 FTE Senior TSO's, 4 FTE TSO's, 1 FTE Enforcement Officer and 1 Compliance Officer (0.8 FTE) supervised by a Team Leader. The amount of resource dedicated to Food Standards equates to 1.5 FTE members of staff. The amount of resource dedicated to Feed Hygiene equates to 0.10 FTE members of staff.

Income received from Public Health for commissioned work allowed three fixed term contract officers to be employed to assist in the provision of the Health Switch programme. Public Health withdrew this funding in July 2022 and the programme was terminated.

The qualifications and competency of food officers is set out in legislation (Regulation (EC) No.882/2004 on Official Controls) and implemented in the Food Law Code of Practice published by the FSA.

The Food Law COP has clarified the requirements for suitably qualified and competent officers and this will be reviewed each year.

Environmental Health Officers all possess a BSc. or MSc. in Environmental Health and are registered with the Environmental Health Officers Registration Board (EHORB). The Food Safety Officer has a Higher Certificate in Food Premises Inspection from the EHORB. Trading Standards Staff working in food and feed law enforcement possess the relevant qualifications required by the Food/Feed Law Code of Practice.

For both services the level of staffing described above allows for compliance with a basic statutory service or relevant and agreed national or regional priorities. Where work is required beyond that basic service the service will either not be able to fulfil that additional requirement or have to stop other statutory functions in order to carry out the work. In the event of a major emergency all staff will be directed to work to control the emergency and basic work will cease for an agreed period - recovery from this will inevitably take time.

4.3 Staff Development

Walsall Council has a regime of Annual Performance Conversations where action plans including training requirements are drawn up for each staff member. These reviews will take account of the food law code of practice requirements as set out above. This may pose an additional cost to the service to ensure all staff are fully qualified and competent.

External and internal training provision will then be identified in accordance with staff and service requirements. To maximise budgetary provision wherever possible support is given to courses provided by CEnTSA or other Local Authorities who have proven to be cost effective training suppliers. The FSA has recently withdrawn much of its free training due to their own budget constraints and so alternative providers will need to be sought. Officers are also able to identify forthcoming training via the CEnTSA annual training plan. In house development in the form of workshops and cascade training is also utilised where appropriate.

Officer Training Programme

- Legalities and Technicalities of Food Law Enforcement
- Traceability e learning
- Licensing and Street Trading Training Workshop
- Outbreak Investigation and Management
- Vacuum Packing e learning
- Nutritional Health Claims
- Food Allergens
- Labelling and Compositional Standards

5.1 QUALITY ASSESSMENT AND INTERNAL MONITORING

The Team Leader makes periodic accompanied visits with Environmental Health Staff this includes the checking of formal notices and paperwork.

Officers will participate in national and regional standardisation exercises, benchmarking and peer reviews as and when they are organised.

It will be the Management Team's responsibility to react swiftly to performance monitoring reports. This will include reflection on inspections where non-compliant premises are found to ensure the right level of intervention has taken place.

The Regulatory Services Manager will undertake a regular assessment of the work of the service culminating in the Annual Review, which is part of the Food Law Enforcement Service Plan process.

The Councils Internal Audit Team last inspected Environmental Health in 2012 giving an assurance level of Significant.

The FSA last audited Environmental Health in 2010 with a revisit in 2011 on the subject of Local Authority Assessment of Hazard Analysis and Critical Control Points (HACCP) Compliance in Food Business Establishments.

Prior to the introduction of the Recovery Plan the Service provided data to the FSA each May through the LAEMS return. The FSA scrutinised this data and reported it on its web site. Currently, the FSA does not require a LAEMS return. Instead, the FSA conducts periodic Food Hygiene – Local Authority “temperature check surveys” to monitor the implementation of the Recovery Plan by local authorities.

6.0 WORKPLAN AND REVIEW

Action	Target		Action lead
Implement the Food Law Enforcement Service Plan	Target 22/23	<ul style="list-style-type: none"> Plan to be submitted to Cabinet and Council for approval Quarterly monitoring of the Plan shared with Management team and staff. 	David Elrington/ Stuart Powell/ Paul Rooney
	Review	To be approved at Cabinet on 14 th December 2022	
Identify and carry out appropriate interventions at high risk premises in relation to food standards	Target 22/23	<ul style="list-style-type: none"> Premises requiring intervention to be agreed. 100% of identified high risk premises to receive an appropriate intervention 	David Elrington/ Stuart Powell
	Review	All high risk premises have received intervention alongside others agreed as above.	
Comply with the requirements of the FSA Recovery Plan	Target 22/23	<ul style="list-style-type: none"> Complete onsite interventions for all establishments rated A, B, C (less than Broadly Compliant), D (less than Broadly Compliant) Implement prioritised programme of onsite interventions for establishments rated C (Broadly Compliant). Implement a prioritised programme of onsite inspections for unrated businesses awaiting an initial inspection. 	David Elrington/ Paul Rooney
	Review	On-site interventions undertaken for establishments rate A, B and C(less that Broadly Compliant) in accordance with Recovery Plan deadlines.	
	Target 22/23	<ul style="list-style-type: none"> Fortnightly uploads to the national database 	

Maintain the Food Hygiene Rating System		<ul style="list-style-type: none"> • Results reported back to Inspecting officers • All appeals dealt with in compliance with the brand standard. 	David Elrington/ Paul Rooney
	Review	<ul style="list-style-type: none"> • Uploads completed fortnightly. 	
Carry out a reactive microbiological food sampling programme focusing on high risk premises and manufacturers	Target 22/23	<ul style="list-style-type: none"> • 100% of premises where failures or issues identified receive a follow up intervention. 	David Elrington/ Paul Rooney
	Review	<ul style="list-style-type: none"> • Ongoing 	
Carry out a proactive programme of inspection and microbiological food sampling at sandwich manufacturers.	Target 22/23	<ul style="list-style-type: none"> • 100% of sandwich manufacturers 	David Elrington/ Paul Rooney
	Review	Sampling and follow-ups completed	
Implement the CEnTSA regional food standards sampling programme	Target 22/23	<ul style="list-style-type: none"> • Premises requiring sampling to be agreed. • 100% of premises receive a sampling visit • 100% of premises where failures or issues identified receive a follow up intervention 	David Elrington/ Stuart Powell
	Review	<ul style="list-style-type: none"> • CEnTSA did not produce a regional sampling programme so no action possible 	
Implement a local food standards sampling programme	Target 22/23	<ul style="list-style-type: none"> • Premises requiring sampling to be agreed. • 100% of premises receive a sampling visit • 100% of premises where failures or issues identified receive a follow up intervention 	David Elrington/ Stuart Powell
	Review	<ul style="list-style-type: none"> • Sampling and follow-ups completed 	

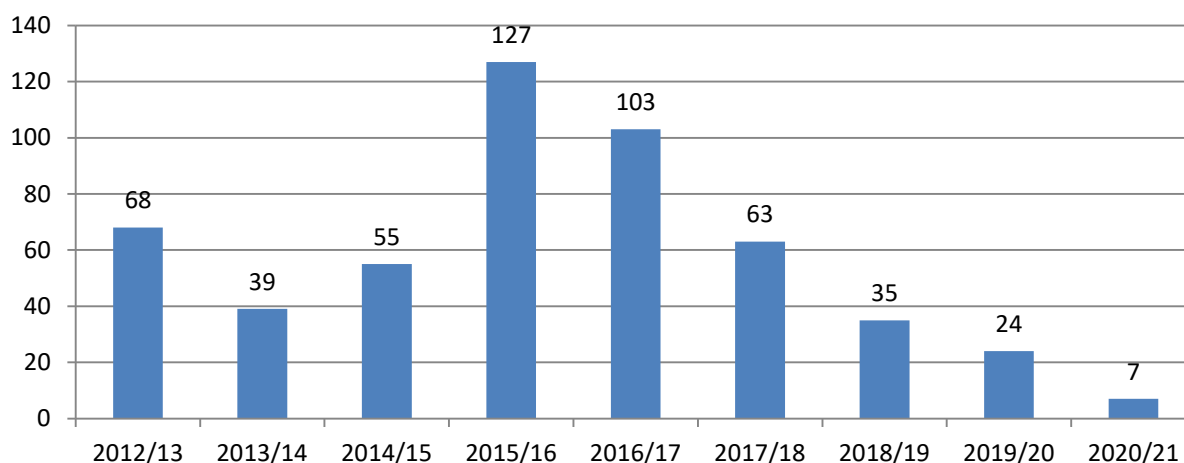
Implement the FSA Feed delivery programme	Target 22/23	<ul style="list-style-type: none"> • Premises requiring inspection to be agreed. • 100% of premises receive an inspection • 100% of premises where failures or issues identified receive a follow up intervention 	David Elrington/ Stuart Powell
	Review	All premises inspected and follow-ups completed	
Respond to all disease notifications using timescales developed by UK-Health Security Agency	Target 22/23	100% response within UK-Health Security Agency recommended timescales	David Elrington/ Paul Rooney
	Review	Responses made within UK-Health Security Agency recommended timescales.	
Respond to requests for advice and visits to new premises within 21 days.	Target 22/23	Number of responses Re-establish web authors and a quarterly check of business advice on walsall.gov.uk Regular Tweets of relevant business advice.	David Elrington/ Stuart Powell/ Paul Rooney
	Review	TS responded to all requests within 21 days EH responded to requests within 21 days. Due to resources limitations it is not possible to generally grant visits to new premises if requested.	
Continue the Health Switch project.	Target 22/23	Identify and work with businesses. Promote attainment of awards through the media.	David Elrington/ Paul Rooney
	Review	Project terminated in September 2022 following withdrawal of Public Health funding.	
	Target 22/23	Number of hours per officer and competency submissions submitted, reviewed and action determined.	David Elrington/

Review training opportunities and number of CPD hours per Officer quarterly.	Review	Training opportunities are reviewed weekly and CPD hours reviewed quarterly	Stuart Powell/ Paul Rooney
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Enforcement Actions 1st April 2021 to 31st March 2022

Closures	Premises	Offences
12th August 2021	Dixy Chicken	Infestation
9 th February 2022	Lazeeza Hayat Sweet Centre	Infestation

Number of Prosecutions or Formal Legal Actions



6.1 Review against the Service Plan

During 2021/22 following the easing of Covid-19 restrictions Officers, who had undertaken Covid-19 enforcement duties, returned to the food team. However, the resumption of “normal” duties was constrained by the requirement to adhere to retained Covid-19 restrictions and associated risk assessments, which increased the average time taken to complete an inspection. Additionally, a deterioration in standards because of prolonged inspection inactivity during the pandemic increased general inspection times. Consequently, this reduced the extent of the food hygiene inspection programme and other areas of work. During 2021/22 Environmental Health reported the following outputs:

- 119 programmed inspections of food businesses
- 173 initial inspections of unrated food businesses.
- 226 planning applications
- 4 Health and Safety Prohibition Notices for Health and Safety at food premises mainly relating to dangerous equipment
- 273 new registrations of food businesses
- 314 food complaints relating to hygiene, practices and premises.

The FSA introduced its national recovery plan in July 2021 to set out timelines for official controls that local authorities were required to deliver in order to re-set their food hygiene intervention programmes following the pandemic. Following the introduction of the Recovery Plan the full Food Safety team was re-established and the designated Covid-19 enforcement team discontinued. The authority's response to the Recovery Plan included the appointment of a FSA funded Administration Officer, during August and September 2021, who contacted and prioritised 151 unrated food businesses for inspection. The response also included the prioritised inspection of Category A and B and unrated food businesses.

6.2 Identification of any variation from service plan

2021/22 was a challenging year, which is reflected by there still currently being 327 unrated businesses and 336 category B and C inspections that would have been due in a pre-Covid 19 risk based inspection regime. These numbers are attributable to continuing Covid-19 restrictions limiting the implementation of the inspection programme. Inspections are taking longer to complete, because of a deterioration of standards in a significant number of businesses, following the suspension of food hygiene inspections during the Covid-19 pandemic. Additionally, the number is increasing because of a large number (273) of new food business registrations received during the year.

In August and September 2021 Environmental Health successfully contacted 151 unrated businesses and completed telephone questionnaires, which were used to prioritise inspections and align the service plan to the Recovery Plan. Additionally, Environmental Health aligned its inspection programme with Phases 1 and 2 of the Recovery Plan, which has effect from 1st August 2021 until 31st March 2023

Cooperative working between Trading Standards, Environmental Health and Licensing will continue to stop the creation of duplicate premises and other anomalies

Improvements to the services ICT system including linking to the corporate address gazetteer should also assist with reducing duplicate or inaccurately recorded premises.

The number of compliant businesses using the FHRS system is 94.8% this is lower than regional (95.3%) or national average (96.9%). We believe our figures are accurate and have been arrived at fairly. They have continued to improve each year since the start of the FHRS system. Walsall does have a higher number of total rated premises (77.6%) than is the regional (73.5%) or national (75.4%) average, which is positive but may also affect our compliance figures.

For 2022/23 the following strains on the service have been identified:

- The volume of work required by the Recovery Plan and other service pressures dictate that the service will not be able to deliver in accordance with the plan. The team's capacity will reduce at the end of October 2022 when an EHO will take maternity leave for up to a year.
- Fewer inspections undertaken during the pandemic have resulted in a deterioration of hygiene standards in some businesses and is cause for concern. This has caused inspections to take longer to complete and could require increased formal enforcement action including closures (HEPN) and prosecutions. Although formal enforcement action is a key component of the Food Law Service Plan it has a major impact on programmed inspection work. It is estimated that closures and prosecution equate to 30 or more programmed inspections. However, it is considered that they are equally, if not more, significant than programmed work since they identify and tackle the most serious premises or products.
- There is a strong potential for the service's ability to meet the Recovery Plan to be reduced when it is necessary to divert Food Safety Officers to other non-food related duties in order to support the investigation of serious Health and Safety incidents and accidents when they occur.
- The 'churn' of Food Businesses is an issue within Walsall where more than 10% of businesses change hands in any given year – some businesses change hands 2-3 times per year. Whilst this can lead to improvements in the operation of a business (if investment is made) it can also lead to inconsistent approaches, poor compliance levels and a decline in standards, which the officers must repeatedly deal with.
- The development and introduction of protocols to deal with allergens will continue to be an ongoing issue during 2022/23 because their implementation will increase the time to complete inspections undertaken in accordance with the Recovery Plan. Additionally, the introduction in October 2021 of a law on allergen labelling for pre-packed foods for direct sale has increased regulatory controls that have to be verified during inspections.
- The authority has been engaged in a transformation programme aimed at making it more able to respond to future and ongoing challenges. However, the implementation of the programme has yet to benefit the food service and make a positive impact on service delivery.

The following actions to mitigate these strains during 2022/23 have been identified:

- As an interim measure it is hoped to mitigate the vacancies arising from the retirement of a Food Safety Officer and an EHO taking maternity leave by the recruitment and

temporary employment of Food Safety Support Officers to undertake food inspections.

- The shortfall in inspections has been identified on the Services Risk Register in terms of the impact it could have in terms of the view of the Food Standards Agency but also in terms of the impact on traders and the public.
- The shortfall in inspections has been reported to the Health Protection Forum, which meets to provide assurance to the Director of Public Health that the health of the public in Walsall is being adequately safeguarded.
- Matters relating to food safety are regularly discussed and updates provided at monthly Portfolio Holder meetings where service and senior managers and the elected member for this area of work meet to discuss issues within the service.

6.3 Areas of Improvement

In addition to those activities that will mitigate strains on the service the following areas of improvement or activities will be necessary in 2022/23:

- Reducing the administrative burden of food inspections by reviewing and streamlining inspection protocols, developing documentation to expedite the preparation of inspection reports and facilitating a greater use of electronic filing systems.
- Develop, implement and monitor an inspection plan for unrated new food businesses using intelligence gained from the Phase 1 triaging and prioritisation exercises required by the FSA's Recovery Plan.
- Continue to monitor and develop a priority rating/intelligence based system for existing businesses that can be used to target work effectively taking into account statutory responsibilities in relation to the Recovery Plan, Food Law Code of Practice and FHRS Brand Standard
- Ongoing review of training and development needs in order to identify how staff can continue to be compliant with the Food Law Code of Practice Competency Framework. Specifically during 2022/23 focussed training and policy development is needed around allergens
- Continue to review the various registration and licensing processes internally so that businesses are identified and recorded appropriately e.g. Street Trading Permits, Late Night Refreshment and Premises Licences, Food Registrations and that intelligence flows around the Regulatory Services appropriately and effectively.

- Identifying efficient work methods to cope with diminishing resources using resources available as part of the Proud Programme – customer contact, income, IT development, Resilient Communities.
- Continue developing relationships with other services and partners to assist with identification of Modern Day Slavery and human trafficking and other community safety priorities.