

Food Service Plan

2025 – 2026

Food, Health & Safety and Airport Team

Community Safety, Compliance & Enforcement Service

Neighbourhoods Directorate

Table of Contents

- 1.0 Service Aims & Objectives 3
- 2.0 Background..... 4
- 3.0 Service Delivery 14
- 4.0 Resources..... 28
- 5.0 Quality Assessment and Internal Monitoring..... 32
- 6.0 Review 34

1.0 Service Aims & Objectives

1.1 Aims:

- Protect public health as far as possible ensuring the safety of food produced, sold and consumed within the city and food imported via Manchester Airport
- Ensure as far as possible that food meets appropriate quality standards, is correctly labelled, described and is free from contaminants
- Advise and educate food businesses and take enforcement action where appropriate

1.2 Objectives:

- Achieve food hygiene and food standards inspections in accordance with the frequencies set out in The Food Law Code of Practice (England) (the Code) which is issued under Section 40(1) of The Food Safety Act 1990, Regulation 6(1) of The Official Feed and Food Controls (England) Regulations 2009 and Regulation 26(1) of The Food Safety and Hygiene (England) Regulations 2013. The Code of Practice is written by the Food Standards Agency and issued by the Secretary of State. Also, the Food Law Practice Guidance issued by the Food Standards Agency
 - Give particular focus to the requirement for businesses to provide safe food to customers with food allergies
 - Respond to complaints regarding food hygiene and standards and undertake appropriate investigations using a risk-based approach
 - Carry out surveillance activities including sampling both inland and at Manchester airport
 - Take appropriate, consistent and proportionate enforcement action against those food businesses that put the health of the public at risk by failing to meet statutory requirements
 - Provide advice to businesses to increase compliance and support growth, working closely with the Greater Manchester Regulatory Centre of Excellence (GMRCE) and the Greater Manchester Business Compliance Support Service
 - Input to the FSAs review of Food Hygiene Controls and plan for opportunities that these changes may provide
 - Work towards the full implementation of the new Food Standards Delivery Model
-

- Continue to work with APHA, DEFRA and the FSA to move towards the national review of EU import and export checks – and work to implement at the Border Control Post.
- Develop and maintain the professional qualifications, competencies and experience of officers undertaking and with responsibility for food safety, food standards and import controls

1.3 Links to Corporate Objectives and Plans

- 1.3.1 The ‘Our Manchester Strategy 2025-2035’ sets out a 10 year vision for Manchester. An excerpt from the strategy outlines: leading us to a clean and green, safe, well connected, difference-loving, modern, must see city that every one of us can be proud to call home – that we know we belong in, and that we’re all better off for being part of
- 1.3.2 The Food Service sits within the Community Safety, Compliance and Enforcement Service and is part of the Neighbourhoods Directorate. The service has an important role in creating growth by supporting businesses to achieve high standards of compliance. This promotes sustainability, safety and supports local areas where people will want to live, work and visit.
- 1.3.3 In relation to outbreak control, we follow the “Greater Manchester Multi-Agency Outbreak plan”. In relation to Port Health matters, we are the Port Health Authority for Manchester Airport and follow the “Port Health Incidents Manchester Airport Response Plan”
- 1.3.4 The Food Service Plan also links into the wider Food Safety, Health and Safety and Airport Team Service Delivery Plan which considers the wider workstream in the team.

2.0 Background

2.1 Profile of Manchester

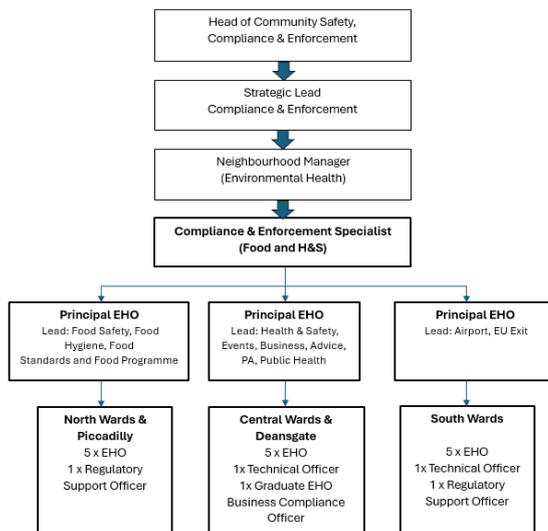
- 2.1.1 Manchester is a large City which is part of Greater Manchester. It is located at the centre of the other 9 Greater Manchester Authorities. The city has a population of approximately 627,700 residents. The number of residents has increased significantly by an estimated 92,000 since 2015. It has an international airport, many sporting, leisure and event venues, and several universities/ higher education establishments. This attracts many people who choose to work, study in and visit Manchester.
-

- 2.1.2 Many events and festivals are held in Manchester each year including Parklife in Heaton Park, Pride, Manchester Food and Drink Festival, the Christmas Markets among many others.
- 2.1.3 Manchester has a very diverse population with an estimated 4,733 residents living in each square kilometre of the city, one of the highest population densities outside of London. It is also estimated that there may be up to 200 different languages spoken in the city. This is according to the findings of a research project undertaken by the University of Manchester. (Multilingual Manchester project) and this is reflected across our food businesses. Over 43% of residents describe themselves as belonging to a minority ethnic community.
- 2.1.4 The City has quite a young population with approximately 90,000 students including 19,000 international students; one of the largest student populations in Europe (source: Complete University Guide April 2023), with many students finding temporary jobs particularly in hospitality and retail sectors.
- 2.1.6 Food Banks: We currently have 30 Food Banks on our database. Last year we had 26. This increase may, in part, be due to cost-of-living issues/unemployment rates.

2.2 Organisational Structure

2.2.1 The Food, Health and Safety and Airport Team sits within the Community Safety, Compliance and Enforcement service of the Neighbourhoods Directorate. The team consists of 22 permanent full-time posts and 2 fixed term posts. (See staffing allocation section 4.4 for current staffing). The Executive Member for Vibrant Neighbourhoods is Councillor Lee-Ann Igbon.

This organisational structure was at the start of April 2025. We now have 2 Graduate EHO's in the Central team, as of October 2025.



2.3 Scope of the Food Service

2.3.1 The Team has responsibility for undertaking the following activities and tasks:

- Programmed food hygiene and food standards inspections including food businesses at events and mobile food traders
- Issuing of approvals for premises under product specific hygiene regulations
- investigate food hygiene/food standards complaints regarding food premises and items of food produced or sold within the City (applying risk-based criteria)
- Investigation of food crime
- Investigate, manage and control outbreaks of food-related infectious disease (provided in conjunction with other Public Protection staff)
- Sampling programmes in line with local, regional and national sampling plans
- Dealing with a range of imported foods, products of animal origin not for human consumption, organic foods, food contact materials etc at Manchester Airport. The team operate 2 Border Control Posts at Manchester Airport, 1 for products of animal origin for human consumption and high-risk food not of animal origin and 1 for products of animal origin not for human consumption
- Provide regulatory advice through Greater Manchester Regulatory Centre of Excellence
- Are the Port Health Authority for Manchester Airport
- Several Primary Authority partnerships and provides Food Hygiene and Food Standards advice as required.
- Provision of Export Health Certificates

2.3.2 The team also has responsibility for Health and Safety enforcement which includes accidents and complaint investigations, proactive inspections and project work. The team also has 9 Primary Authority partnerships. The team also enforces Public Health legislation.

2.3.3 The service works with outside agencies where specialist knowledge and joint working is vital. These include Lancashire County Council Scientific Services (Public Analyst), UK Health Security Agency (UKHSA) including their Food Water and Environment Lab (Microbiological Food Examiner), Food Standards Agency, Department for Environment and Rural Affairs, Animal and Plant Health Agency, Marine Management Organisation, Border Force, HMRC, Greater Manchester Police, Greater Manchester Regulatory Centre of Excellence, Greater Manchester Food and Health and Safety Group, Trading Standards Northwest, Bureau Veritas. This is not an exhaustive list.

2.3.4 The service also engages with a variety of private companies and partner organisations to fulfil its statutory duties. These are:

- Veterinary service (Eville and Jones) to provide Official veterinary services at the Border Control Post on its behalf.
- Contractor (Osborne Richardson) to carry out some of its Food Hygiene/Standards inspections.
- Service Level Agreement with Swissport at Manchester Airport regarding the operation of the Border Control Post. Swissport move cargo in /out of the Border Control Post and assist with temperature checking among other things.

2.4 Demands on the Service

2.4.1 Inspections: The largest demand on the service is the programmed inspection of food premises. The Council runs a dual inspection programme, meaning we undertake interventions at food premises to ensure compliance with both food hygiene and food standards requirements. There were 5679 food premises on the Council's database at the start of the 25/2026 food programme year. Last year (24/25) this was 5877, so broadly similar. It is anticipated that the overall number of food businesses will continue around this figure during 25/26.

Table 1. Food Establishment - Food Hygiene Profile (April 2025)

Risk Category	Number of Food Premises	Minimum Frequency of Inspection
A	13	Every 6 months
B	213	Every 12 months
C	1088	Every 18 months
D	2317	Every 2 years
E	1873	Alternative enforcement strategy or intervention every 3 years
Unrated	172	
Outside the Programme	3	N/A
Grand Total	5679	

Table 2. Food Establishment - Food Standards Profile (April 2025)

Risk Category	Number of Food Premises	Minimum Frequency of Inspection
A	31	Every 12 months
B	1726	Every 24 months
C	3736	Alternative enforcement strategy or intervention every 5 years
Unrated*	172	
Outside the Programme**	3	N/A
Grand Total	5668	

2.4.2 *Unrated premises are premises that are awaiting an inspection e.g. a new food registration has been received. Please see section 2.4.4 **Outside the food programme businesses are businesses that are not required to be inspected in our food inspection programme, but we can choose to inspect them. This can include e.g. mobile traders that are registered with another Local Authority and therefore inspected elsewhere but trade occasionally in Manchester. Premises are split into the following categories as specified by the Food Standards Agency.

Table 3. Food Establishment Categories

FSA Premises Categories	No. of Food Premises
Manufacturers and Packers	60
Importers/Exporters	5
Distributors/Transporters	86
FSA non-food	10
Supermarket/Hypermarket	83
Small Retailer	421
Retailer - Other	860
Restaurant/Cafe/Canteen	1670
Hotel/Guest House	107
Pub/Club	475
Caring Premises	225
School/College	211
Mobile Food Unit	164
Take-Away	608
Restaurant and Caterers - Other	526
Grand Total	5511

2.4.3 16 premises are approved under product specific food legislation under Regulation (EC) 853/2004, as follows:

Table 4. Approved Premises Categories

Approved Premises	Number of Establishments
Meat Preparation Establishment	0
Processing Plant (Meat)	3
Processing Plant (Fish)	1
Multi approval categories	7
Cold Store	3
Processing Plant (Dairy)	1
Rewrapping	0
Total	15

2.4.4 **New Food Registrations / New Businesses Trading:** There has been a significant increase in the numbers of new businesses that we have become aware of over the last 4 years. Where we become aware of a new business, we require that the business registers through the FSA website. This has been a new process over the last 12 months which explains why there are no “New Business trading “in the table below for last year. All register. Previously if we became aware of a new business that hadn’t registered, we would inspect them but wouldn’t necessarily ensure that they registered. Typically, around 300 businesses that register each year do not go on to trade. The rest are allocated for inspection for both Food Hygiene and Food Standards.

Table 5. Number of New Food Businesses Trading / New Registrations

Year	New Food Registrations	New Business Trading	Total
2016-2017	622	255	877
2017-2018	507	155	662
2018-2019	445	168	613
2019-2020	608	224	832
2020-2021	550	83	633
2021-2022	1031	237	1268
2022-2023	812	294	1106
2023-2024	805	334	1139
2024-2025	1423		1069

- 2.4.5 As a service we are currently assessing around 1400 new businesses each year. It was felt that this may reduce following the pandemic, but the last couple of years the numbers have remained consistently high. New Registrations are assessed by officers in our Compliance & Performance Team to establish if they are trading. Between the 1st April and 24 October 2025 we received 1038 New Registrations so look on track to receive the most, New Registrations, that we have ever received as a team.
- 2.4.6 All new businesses are triaged into High/Medium or Low for Food Hygiene risk based on the inherent risk of the type of business. This will determine how quickly they will be inspected with priority being given to the highest risk premises.
- 2.4.7 In 24/25, 1311 businesses were established as ceased trading compared to 1267 in 23/24. Many of these re-open as a different food business and as such there is a significant turnover of businesses.
- 2.4.8 **Complaints:** The service also responds to service requests which include complaints regarding food safety, hygiene and standards, 1117 service requests were received during 24/25. The previous year this was 1433
- 2.4.9 **Events / Markets:** Manchester holds a wide variety of events across the year. These range from the Manchester Christmas Markets and a Caribbean Carnival to large music festivals such as Parklife located in Heaton Park. The Food Team inspects food concessions at these events. Since the pandemic there has been a significant increase in the number of events across the city. The Co-op Live Arena opened in Manchester last year which is the largest indoor Arena in Europe with a capacity of 23,500. The AO Arena is also in Manchester and prior to the Co-op Live was the largest indoor Arena in the UK with a capacity of 23,000. The 2 largest indoor Arena's in the UK are in Manchester. The team inspect Food Safety provision at these venues as well as the many other Sporting venues in Manchester, such as, the Etihad stadium (Home to Manchester City Football Club), the Velodrome (Home to British Cycling), the National Squash Centre, Regional Athletics and Regional Tennis Centres, Bellevue Speedway Stadium and Manchester Aquatics Centre to name a few.
- 2.4.10 **Other Workstreams:** Officers in the Food, Health and Safety and Airport Team deal with a wide range of workstreams including operating Border Control Posts at Manchester Airport, being the Port Health Authority at Manchester Airport, Health and Safety enforcement and project work, operating 9 Primary Authority Partnerships. Following the pandemic, several Primary Authority partners have contacted the team wanting significant pieces of work carried out. The National Regulation Food Standards Agency (FSA) workstream is meaning that we are also being asked to review Hazard Analysis Critical Control Point (HACCP) plans etc which can be significant
-

pieces of work. All requests are considered within current resources. The team also enforces Public Health legislation.

- 2.4.11 **Food Hygiene Rating Scheme:** Manchester City Council runs a Food Hygiene Rating Scheme in partnership with the Food Standards Agency. Its primary aim is to provide consumers with information on hygiene standards, promoting choice and confidence and encouraging businesses to maintain high standards. We follow the Food Standards Agency’s guidance: Food Hygiene Rating Scheme Guidance for local authorities on implementation and operation of the Brand Standard. At the end of an inspection an officer calculates a score from 1 – 5, with 5 being the highest rating for very good hygiene standards. A sticker reflecting the score is issued to the business and the score is uploaded to the FSA website where it is then available to consumers. Please note, not all food businesses receive a Food Hygiene Rating. Some businesses are exempt/excluded. Details of the scope of the scheme can be found in the [Brand Standard](#) guidance on the FSA Website.

Table 6. Food Hygiene Rating Profile Across Manchester as of July 2024

Rating	Number of Premises 2024	Number of premises 2025
5 - Very Good	3852	3932
4 - Good	927	871
3 - Generally Satisfactory	445	418
2 - Improvements Necessary	93	111
1 - Major Improvement Necessary	134	144
0 - Urgent Improvement Necessary	19	20
Total	5470	5496

- 2.4.12 The above table does not include unrated or outside the food programme premises. As such the overall figures will not match the figures as outlined in 2.4.1 Also, as the data was run on a different date to the data contained in table 1 and 2. The overall number of food businesses is constantly changing with businesses closing down/opening.
- 2.4.13 As can be seen in table 6, there are a total of 275 not broadly compliant businesses (0, 1 or 2). We work with non-broadly compliant businesses to get them to become broadly compliant on paper (level 3 or above) as per the Food Law Code of Practice. Businesses must pay for a re-rating if they would like it before their next Official intervention. Often businesses wait till their next official intervention to be re-rated.
- 2.4.14 **Border Control Post (BCP):** We operate 2 Border Control Posts at Manchester Airport. One covers commercial imports of products of animal origin (POAO) for human consumption and high-risk food not of animal origin (FNAO), also food contact materials, organic imports and fish catch

certificates, the other covers commercial imports of products of animal origin not for human consumption. Certain products being imported into the UK must be presented to the Border Control Post for checks.

2.4.15 We have 8 officers from the team who operate on a rota system, and each spend a week at a time working at the Border Control Post. We also have an Official Veterinarian Surgeon (OVS) contract where we have an OVS who works at the Border Control post almost full time. The Border Control Post typically operates 8am-6pm, Mon –Fri but also operates an out of hours service 24/7 if required. A new Border Target Operating Model (BTOM) came into operation on the 30 April 2024. Certain imports from the EU are now subject to import official controls. Import requirements for the rest of the world (outside EU) have also changed. (*The BCP and impact of the BTOM - period looked at is 1st April 24-31st March 25*)

2.4.16 The new Border Target Operating Model commenced on 30th April 2024. This brought in the checks on imports from the EU, a new risk categorisation for imports (low, medium and high) and digitalised health certificates (only for imports from EU countries.) The impact of the BTOM on the airport team:

- **Higher number of imports due to checks on EU imports starting.** There were 75 consignments from the EU between 30th April 24 and 31st March 25. However, the majority of imports, 572 in the same period, were from the Rest of World countries (not EU) so overall, there was not a significant increase of time spent carrying out checks and therefore staffing numbers for the BCP remained the same. Checks on EU imports often took longer in the initial months of the BTOM (further details below.)
 - **Changes to IPAFFS** (Import of Products Animals Food and Feed system) and start of digital health certificates. This involved adapting to new processes within the IPAFFS system which were brought in to try and ensure that there was not a backlog of imports at the Border and officer's being provided access to the EU TRACES NT system and learning how to check digital health certificates.
 - **Importers/Import Agents had to adapt to the new requirements for imports to GB including completing the correct documentation** e.g. ensuring health certificates of the correct model for GB, were provided for relevant imports which would not have required health certification prior to the BTOM. Officers were taking more time to complete checks on consignments due to issues with documentation particularly in the first 6 months. There were also more requests for advice received from importers and agents around EU imports.
 - **Adapting to the new risk categorisation for imports.** Imports are not automatically risk categorised by country and commodity so Officers and importers / freight forwarding agents needed to understand the new categorisation so that imports were categorised correctly which determines the level of checks and the charges applied to the import
-

checks. This resulted in more requests for advice from importers / agents and an increase in time spent dealing with consignments to check the risk categories, seeking advice from DEFRA and ensuring incorrect risk categories were corrected.

- **New charging system based on risk categories** was brought in for products of animal origin consignments.
- There were many meetings with DEFRA / FSA and other port health authorities during the first 8 months of the BTOM to help in ironing out any issues and sharing advice / guidance.
- **New workstream of serious import notifications (sin's)**. The FSA regularly send through import notifications for us to check where irregularities/concerns have been noted. The numbers of imports requiring checks last year significantly increased from the previous year. (Table 7). The Border Control Post operates on a cost recovery basis.

Table 7. Imports processed at Manchester Airport Border Control Post

Imports	2023/24	2024/25
Number of consignments processed	828	1154

- 2.4.17 We had 651 POAO imports, 186 were high risk, 357 were medium risk , 33 were low risk. This leaves 75 - which is due to some consignments not having a BTOM risk rating as they are from countries that have not been assessed under the BTOM and the BTOM didn't come in until 30th April 2024. Central Government recently announced that there will be a reduction in import checks from the EU. The progress of this will be kept under review.
- 2.4.18 **Food Standards Delivery Model:** We transitioned to the Food Standards Delivery Model on the 1 April 25 in that we started inspecting new registrations and priority inspections.
- 2.4.19 **Food Hygiene Delivery review:** We sent comments to the FSA re: the proposed changes to the Food Law Code of Practice and Practice Guidance. The Food Law Code of Practice and Practice Guidance were reissued on the 24 October 25, and we are working to assess the changes and any efficiencies or resource implications as a result.

2.5 Enforcement Policy

- 2.5.1 A corporate enforcement policy has been adopted by the Council. A copy of the policy is available to view on the City Council's website and is also provided at every inspection. ([Corporate enforcement policy | Corporate enforcement policy | Manchester City Council](#))
-

3.0 Service Delivery

3.1 Interventions

3.1.1 Food Hygiene and Standards interventions should be carried out on the basis of risk-based prioritisation, in line with the FSA Code of Practice. The type of interventions available to a Local Authority to ensure food businesses control hazards and provide food that is fit for human consumption are set down in Regulations as the following Official Controls:

- Full Inspections
- Partial Inspections
- Monitoring
- Surveillance
- Verification
- Audit
- Sampling when analysis is undertaken by an Official Laboratory

3.1.2 Officers use the range of interventions to target resources where the risk is greater. The figures show the range of interventions carried out in 24/25 compared to 23/24.

Table 8. FH intervention figures comparison

FH intervention type	2023/24	2024/2025
Inspections	2778	2219
Partial Inspections	33	16
Audits	0	1
Rescores	68	77
Non FHRS information intelligence intervention	643	579
Total	3522	2892

Table 9. FS Intervention Figures Comparison

FS intervention type	2023/24	2024/2025
Inspections	2608	2170
Partial Inspections	166	48
Audits	1	5
Rescores	0	27
Non FHRS information intelligence intervention	640	483
Total	3415	2733

3.1.3 During 25/26 an aim is to increase the number of partial inspections/ audits carried out at food businesses to further ensure a better use of available resources by focusing more resource at higher risk situations.

3.2 Food programme 2025/26

- 3.2.1 The Service runs a combined Food Hygiene and Food Standards Intervention programme as is permitted in Section 4.2 of the Food Law Practice Guidance. Where the same officer is responsible for enforcement of both food hygiene and food standards matters in an establishment, or feed hygiene, the officer should decide whether it is appropriate to cover one or more matters at a single visit, even though an intervention may not be due under one of the Competent Authority's planned intervention programmes
- 3.2.2 We run the FH and FS inspection programmes separately and inspect FH and FS together where we can. All new registrations will be inspected for both FH and FS as per requirements for FH. We cannot currently take advantage of the reduced frequencies for new registrations in the FSDM as we still have to inspect all new registrations for FH as per the FLCoP. To be able to issue a Food Hygiene Rating as per the *Food Hygiene Rating Scheme: Guidance for local authorities on implementation and operation- the Brand Standard* we must also carry out an inspection/partial inspection or audit. The brand standard states: *The new establishment should be rated under the FHRS at the first inspection, partial inspection or audit as soon as possible after registration*
- 3.2.3 The number of food businesses requiring interventions in 2025/26 is discussed below.
- 3.2.4 The overall total number of interventions to be carried out during 25/26 is significantly higher than 24/25.

Table 10. Food Hygiene Programme by Risk Profile 2025/26

Intervention Requirement	Intervention Frequency	No. of Premises Due Intervention April 24/25	No. of Premises Due Intervention April 25/26
A	At least every 6 months	18 (x2)	15 x2
B	At least every 12 months	148	224
C	At least every 18 months	709	815
D	At least every 2 years	1158	1169
E	At least every 3 years	268	807
Unrated	No inspection frequency allocated	266 + estimated 1100 during the year	172+ estimated 1300 during the year
N/A	Christmas Markets	52 Approx	
Total		3737	4517

Table 11. Food Standards Programme by Risk Profile 2025/26

Intervention Requirement	Intervention Frequency	No. of Premises Due Intervention April 24/25	No. of Premises Due Intervention April 25/26
A	At least every 12 months	26	New intervention requirements came in on 1 st April 25
B	At least every 24 months	687	
C	At least every 5 years	12	
Unrated	No inspection frequency allocated	266 + estimated 1100 during the year	172+ estimated 1300 during the year
N/A	Christmas Markets	52 Approx	
Total		2143	Approx 3550

3.2.5 The above due interventions include a significant number that can be done together e.g. all Unrated (New Registrations) are inspected for FH and FS at the same time. Where FH and FS are due up to the 31st of March 2026 and where neither are receiving a low-risk questionnaire and where the FS due intervention is a Priority intervention or MR1 we will inspect for FH and FS at the same time.

3.3 Food Standards Delivery Model

3.3.7 Food Standards (FS) work considers how food products are described, presented and labelled and includes food composition (is the food what it states it is), ingredients, nutrition claims and health claims. This includes information on allergens present in food and allergen labelling. Labelling requirements include calorie labelling that are required by larger businesses. FS requirements enable everyone to make more informed choices about what they are eating. It also helps to ensure that products are safe for human consumption and do not, for example, contain ingredients/substances which may be harmful to health.

3.3.8 The Food Standards Agency (FSA) regulate all local authorities in relation to FS work, and they became concerned nationally that the inspection model was no longer fit for purpose in relation to the new challenges of regulating a modern food industry. Their main drive for improvements was around intelligence and prioritisation of risk, increased focus on allergen management and the ability for regulation to keep pace with changes, increased on-line food sales, more complex food supply chains and ensuring consistency in regulatory and enforcement practices.

3.3.9 To address these challenges, the FSA developed a new national system called the 'Food Standards Delivery Model (FSDM) to score interventions at businesses. This new model introduces an updated FS risk rating system with

inspection frequencies ranging from 1 month to 10 years, compared to the previous range of 12 months to 5 years. The inspection frequencies fall into high priority, medium risk and low risk. This change ensures that the highest risk premises are inspected more frequently. Additionally, the FSDM includes a specific category to assess a business's compliance with legal requirements related to allergen controls. Via consultation with the FSA, the team aligned procedures and frameworks with the FSDM and designed and implemented training for staff to ensure confidence in both the delivery and the outcomes of the new model. The team successfully met these challenges and so were in the position to start inspecting newly registered and targeted priority businesses, using the new model, from the 1st of April 2025.

- 3.3.10 In addition to addressing the impact of the changes on new businesses it was necessary to understand the impact of the FSDM on the existing database of food businesses. The FSDM had to be applied retrospectively to around 6000 businesses, which would not just change risk ratings but subsequently the frequency of inspection, and in some cases significantly given the greater range of inspection frequency from 1 month up to 10 years. This work has been a substantial collaborative effort with the Compliance & Performance Team, the FSA, IT and the system supplier. This complex transition took 7 months to complete and only very recently has the team been able to understand the shift of the annual food standards programme and the impact on both current and future resources required to meet this new demand.
- 3.3.11 The new FSDM risk rating revealed that we had (end of Nov 25) 1374 programmed FS inspections to complete before the 31st of March 2026 in this current food programme. 249 of these inspections were from previous years that had now become due for inspection under the FSDM. It will not be possible to complete all these FS inspections within available resources in the 2025/26 programme. The requirements of the FSDM have also increased officer time to complete inspections.
- 3.3.12 A risk-based approach is being taken to ensure that this backlog contains no priority risk interventions. It is expected that the team will complete 331 FS inspections in 25/26. This leaves a backlog of 1043 medium risk businesses that will be carried forward into the 2026/27 programme. This backlog has been discussed with the FSA, and they have confirmed that most local authorities are in a similar position.
- 3.3.13 At this time, work to be undertaken to fully understand the resource implications of the new FSDM. There are several actions currently being considered to tackle the backlog, including, the option to carry out remote assessments in a range of businesses and the use of more partial inspections targeted on specific issues.
- 3.3.14 In addition to the programmed inspections, the team also receive a high volume of new food businesses registrations, throughout the year, that all
-

require inspection with 28 days of registration. This number has increased significantly during and since the Covid-19 pandemic. For 25/26 to date (Apr – Nov) the team carries have already received 1074 new registrations. The service typically, forward around 200/300 new registrations that come in towards the end of the year (Feb/March) into the following years inspection programme. Not considering this annual carry over the increase in food registrations and the extended time it takes to complete these inspections due to the FSDM requirements it is expected that a further 150 newly registered businesses will form part of the backlog. There is a very high turnover of businesses and in 24/25, 1311 food businesses ceased trading.

- 3.3.15 It is Important to note that the FSA have just (as of the 24 October 25) re-issued the Food Law Code of Practice and Practice Guidance following consultation regarding FH controls. These documents cover FH and FS controls. We have yet to fully digest this and the changes that this will bring. It does however introduce a different approach for premises risk assessed to be Category E for FH i.e. low risk with an intervention frequency of 3 years. Normally FH Category E's receive Low Risk questionnaire's apart from a small number that we select for inspection. We will be required to alternate between official controls and non-official controls going forward which will significantly increase our resource needed around category E premises. We currently have around 1900 Category E food businesses.
- 3.3.16 New Registrations may be put a little into the future for lower risk businesses for FH and FS following a desktop analysis (which may help this current food programme)- we will still ultimately have to process them.
- 3.3.17 The changes also introduce remote assessments for FH in certain situations and an extension of the activities that officers, who do not hold an 'appropriate qualification' for food hygiene or food standards, can, if competent, undertake.
- 3.3.18 We will within current resources be taking a large FS backlog into the next food programme. It now looks likely that the resource around our FH programme will also increase.

3.4 Food Allergenic Ingredient Control

- 3.4.1 Every business in the food supply chain must take responsibility for ensuring that the allergen information they provide to customers is accurate. The Food Information Regulations 2014 require all food business selling non-prepackaged food (such as meals in a takeaway or restaurant) to identify 14 allergenic ingredients in all their menu items and provide this information to customers on request. This is dealt with during food standards inspections undertaken by the Council.
- 3.4.2 In addition to providing the correct information to customers, food businesses must also prevent cross contamination as far as possible during the storage, preparation, service and delivery of food. A Food Standards Agency Report
-

(16 May 2024) has found that around 6% of the UK adult population have a food allergy. This equates to around 2.4 million adults in the UK. (FSA Web article: Around 6% of the UK adult population have a food allergy, new report from the Food Standards Agency finds | Food Standards Agency)

- 3.4.3 The consequences of ingesting allergenic ingredients can be severe including death. 7 allergen near miss instances were reported to the Team in 24/25. 3 food allergen near miss instances were reported to the Council in 2023/24. An allergen near miss is where someone may have suffered an allergic reaction but has recovered. They may also have been served food containing the food allergen to which they are allergic but did not consume the product. Due to the food safety risks involved for those suffering food allergies, ensuring businesses comply with legal requirements is a key area of work for 2025/26.
- 3.4.4 Manchester developed and use food allergen 'voluntary stop agreements' in businesses that cannot initially show they are providing the correct information, controlling cross-contamination or delivering safe food. The business agrees not to provide meals to customers who declare they have an allergy/intolerance until they can comply with legal requirements This ensures that the risk to the public is removed. Allergen Stop agreements are now utilised by other Local Authorities.
- 3.4.5 As of 3 July 25, 770 businesses had allergen stop agreements in place. In 2024 (16 May), 724 businesses had allergen stop agreements in place. During 24/25, concerns with products pre-packed for direct sale were found in 34 premises. This compares to 60 premises in 23/24 so has reduced.
- 3.4.6 An aim during 25/26 is to better capture allergen stop agreement data. Currently we do not always properly capture situations where the stop agreement could have been lifted. There has been inconsistency in the issuing of stop agreements if there is an agreement already in place. Sometimes a new one is issued, sometimes not. Consistency sessions will be run to support improvements.

3.5 Manchester REACTS

- 3.5.1 An internal working group was created called Manchester REACTS (Raising Effective Allergen Compliance through Training and Support) who have developed and are currently rolling out an allergen training package. We currently have around 770 food businesses with allergen stop agreements in place. These are businesses who were assessed to be non-compliant with the law relating to allergen management. To protect our residents and visitors to our city, a voluntary agreement to stop serving customers with food allergies was signed - until such times that they have reviewed and improved their allergen controls and have had them re-assessed by an Officer. Rather than instigate formal action in the first stage, Manchester REACTS was created to determine the most appropriate action to address this non-compliance. The outcome was the development of a bespoke training package to help raise the
-

knowledge and understanding of such businesses around allergen management.

- 3.5.2 We felt we needed to develop a package rather than deliver what is already available because we have recognised there is a need to target underlying issues bespoke to local businesses who have been issued with stop agreements and not making progress with allergen controls. We have listened and taken on board feedback from officers following inspections that the reasons for noncompliance are due to language barrier, different educational abilities, lack of knowledge, skill and understanding of what businesses are required to do to comply with the law rather than a reluctance to comply. For this reason, we decided to take an educational approach to increase the knowledge of certain food businesses. We also recognised training currently available is quite academic and complex therefore we have taken what is a complex subject and broken it down into smaller components consisting of academic and practical/interactive work with the aim of bringing allergens to life.
- 3.5.3 By supporting such businesses to be able to serve customers with food allergies, it also helps to ensure that customers with allergies have more access to eating out. We are initially targeting businesses that have had multiple allergen, Stop Agreements issued, as they do not appear to be making progress with allergen controls.
- 3.5.4 Two rounds of training were delivered to 24 businesses at the end of March and 21 businesses in June 2025. Feedback from the training has been positive with businesses commenting;
- *'Very practical and informative'*
 - *'Absolutely all information presented in a plain easy way'*
 - *'Clear, well-presented and accessible.'*
 - *'Even old hand like me learnt something'*
- 3.5.5 Follow up visits will be carried out to all businesses who attended the training to assess if the stop agreements in place can be lifted. Any businesses who are still non-compliant will be assessed in respect to any further support they require or considered for potential enforcement action.
- 3.5.6 The vision for Manchester REACTS is to have it on a rolling programme. We will continue to target businesses with allergen stop agreements in place; we will look at business recommendations for the training from Officers. We will also consider newly registered businesses. We will also explore opportunities for how Manchester REACTS can be developed further.
-

3.5.7 A Food Allergen Strategy 25/26 has been produced outlining all the different strands of food allergen work. A workstream will be to look at the current Stop agreements to see if there are any patterns in relation to, for example, types of premises/ geographical area/ type of cuisine etc to see if this will inform a further workstream.

3.6 Alternative Intervention Strategy/Information and Intelligence Gathering

3.6.1 The Food Law Code of Practice states that every Competent Authority must devise an Alternative Enforcement Strategy to determine how they will conduct official food controls at premises rated as low risk in accordance with the requirements as set out in guidance. The intervention for premises rated a High-Risk for Food Hygiene must be an inspection, partial inspection, or audit. Competent Authorities can alternate between these types of official food controls and other types of interventions. The intervention for premises rated a Low-Risk for Food Hygiene can alternate between either an intervention that is an official control and an intervention that is not an official control. NB – The food Law Code of Practice update in October 2025 changed the intervention requirements for some Low-Risk premises. We are assessing these changes to start at the next Food Programme from 1st April 2026. The Food Law Code of Practice states:

- *Every Competent Authority must devise an Alternative Enforcement Strategy to determine how they will conduct official food controls at premises rated as low risk for food hygiene or, a score of no less than 4 for both inherent risk and compliance assessment for food standards*

3.6.2 Questionnaires are being sent out as follows:

- Food Hygiene – 1269
- Food Standards – 4

3.6.3 Questionnaires received will be assessed by Officers in the team and will either be identified for follow up, put on our system as information and intelligence gathering or closed and a new record created if a new business is in its place. A lead Food Officer oversees this. Those businesses that do not respond to the questionnaire are followed up by staff in the team/Regulatory Support Officer to see if they are trading/any changes. Again, the responses from this are assessed as above.

3.7 Unrated Food Premises

3.7.1 The turnover of food premises in Manchester is extremely high with an estimated 1100 new food establishments opening in the city every year. Unrated premises are those that have not yet been inspected and include new premises registrations, new premises identified as trading and premises not yet trading. We become aware of these premises in several different ways including formal food registrations, changes in name/ use identified by officers, licensing department referrals, customer complaints, low risk monitoring and intelligence visits, neighbourhood officer intelligence and

internet searches. Unrated premises must receive a full food hygiene, and food standards visit. It is estimated that there will be around 1300 unrated inspections in 2025/2026.

3.8 Revisits

3.8.1 Revisits are carried out to food premises in line with the Food Law Code of Practice and are important in ensuring that premises have put in place improvements required by Officers. During 24/25, 157 revisits were undertaken for food hygiene issues and 58 for food standards issues. During 2023/24 re-visits were undertaken at 235 premises for food hygiene and 46 for food standards.

3.8.2 We also undertake visits for re-scoring premises under the 'Food Hygiene Rating System' (FHRS) following formal requests from businesses. During 24/25 we received 104 FHRS rescore requests. We have 3 months from payment to carrying out the revisit requests so some requests will have gone into the current 25/26 year. A significant driver for businesses requiring re-scores is the aggregator platforms such as Just Eat, Uber Eats etc. requiring certain FHRS ratings.

3.9 Enforcement

3.9.1 The food service commits to increase the level of formal enforcement action undertaken by Officers during interventions where appropriate and internal monitoring procedures are in place to ensure that enforcement decisions taken by Officers are in line with the corporate enforcement policy. Prosecutions will continue to be taken against those businesses that pose the most serious risk to the public and persistently fail to comply with legal requirements. It is expected that improvement notices under the Food Information Regulations and hygiene improvement notices regarding allergen controls will increase during 2025/26 due to the targeted allergen workstream previously mentioned.

3.9.2 During 24/25 there were 2 prosecution cases. There were 46 businesses subject to voluntary closures mainly in relation to pest activity. This has reduced slightly to the previous year where there were 59. If any business is causing an imminent risk from operating, we will require that the business closes until such risk is removed. The business may be given the choice to close voluntarily, and some businesses are formally closed. Case reviews are held regarding every business that has been closed due to an imminent risk, to determine if further action is to be taken. These are held between the officer and a manager following our internal procedure.

3.9.3 There were 13 imported food notices served during the year. These are notices served on imported foods where the foods do not comply with UK Food Safety requirements and as such the products if at the Border Control Post at Manchester Airport are not permitted entry into the UK and if inland are removed from sale - 5 seizure/detention/surrender notices were served. 1 FS Improvement notice was served.

3.9.4 As part of the Manchester Allergen Strategy there will be a focus on enforcement. Together with training, support, advice, guidance and sampling, blatant breaches of the regulations may result in formal action.

3.10 Food Complaints (Requests for Service)

3.10.1 Food service requests fall into the following broad categories: food contamination, Complaints about food businesses (e.g. hygiene, pests), food alerts, food composition & labelling and Imported food. During 2024/25 we received 1333 requests for service for food issues compared to 1,433 requests during 23/24. This was split between FH – 1077 and FS – 256. 25 complaints were received re: food allergens. The responses to requests for service vary from the provision of advice to investigations and inspections, to liaison with the retailer/ manufacturer, to formal action in line with the corporate enforcement policy.

3.10.2 A request for service is allocated to the team for further investigation if it is likely to present a risk to health and/ or significant non-compliance with food standards and labelling requirements.

3.11 Home Authority and Primary Authority

3.11.1 The team will follow the provisions of the Home Authority Principle. The Home Authority Principle is governed by a Joint Statement of Commitment (JSOC), signed by the OPSS, the Chartered Trading Standards Institute (CTSI) and the Chartered Institute of Environmental Health (CIEH), in June 2011. The team has 10 Primary Authority partnerships. 3 partnerships are directly with Manchester City Council, and the 7 most recent ones were arranged through the Greater Manchester Regulatory Centre of Excellence.

3.11.2 Primary Authority partners are wanting significant amounts of work carried out which is considered within current resources. It is noted that the National Regulation workstream by the Food Standards Agency is resulting in the team being asked to assure Hazard Analysis Critical Control Point (HACCP) Plans. The team has a Primary Authority lead Officer who oversees all partnerships. Where significant pieces of work are being requested by a partnership these will be discussed with management including the Primary Authority Lead Officer to ensure that sufficient resources are in place for business as usual for the team.

3.12 Advice to Businesses

3.12.1 The Greater Manchester Regulatory Centre of Excellence (GMRCE) launched in November 2017 and was developed by the 10 Greater Manchester Local Authorities and GMFRS under the 'Better Business for All' agenda.

3.12.2 The GMRCE offers a range of free and paid-for regulatory support and advice, which includes Primary Authority Partnership. Businesses can obtain the full range of advice on food hygiene and standards along with other regulatory areas such as fire safety, trading standards, private sector housing and health and safety at work. Primary Authority allows businesses to form a

legal partnership with a local authority, which then provides robust and reliable advice for other councils to consider when inspecting or dealing with non-compliance.

- 3.12.3 The overall aim is to form more effective relationships with businesses and key partners such as the Growth Hub, Federation of Small Businesses and wider Council Departments such as Work & Skills. We recognise the need to gain a better understanding of the issues facing local businesses across the City and how to best engage with them effectively. Benefits include greater consistency, increased efficiency and ultimately savings for business. The GMRCE has a project manager, employed by Tameside City Council and paid for by all 10 Greater Manchester Local Authorities. The project manager, coordinates partnership agreements and access to advice across the Centre of Excellence.
 - 3.12.4 An Environmental Health Graduate joined Manchester City Council with eight other apprentices and graduates as part of Greater Manchester's new Business Compliance Support service in October 2023, funded by the Regulator's Pioneer Fund (distributed by the Department for Science, Innovation & Technology). The team have engaged with over 3500 businesses since its creation, created a website with useful guides, and delivered online and in-person workshops for businesses struggling to understand their compliance requirements.
 - 3.12.5 Since January 2024, our Graduate has engaged directly with over 350 businesses providing support and guidance to businesses across the City. They have worked at a number of high profile events, and developed strong links with the City Council's partners including the Business Growth Hub and Build a Business, as well as the Council's work & skills team, taking part in walkabouts, roadshows and delivered a 30-minute Thrive with a Five session to local food and drink businesses at The Town Hall's Generator providing guidance on how to get the highest possible food hygiene. The Business Compliance Support Service launched on the 19 April 24.
 - 3.12.6 Added contributions to the wider team include responding to food/ H&S complaints and service requests, contributing to project work and Allergen Training through the Manchester REACT project. The role will enable the Graduate to be developed to full CIEH Registration and when completed this will allow him to be authorised to inspect all food businesses including the highest risk premises. The Business Compliance Support Team has been a great benefit to us in Manchester. It also helps us to engage better with our local business communities and offers them help and advice whilst also getting them ready for inspections.
 - 3.12.7 The Business Compliance Support Service has been a great success. Our Graduate has recently secured a permanent position in our team, and we have recently recruited 2 further Graduates to the post to work with the Business Compliance Support Service until the end of Sep 2026.
-

3.13 Food Sampling

- 3.13.1 We have a sampling plan which gives an overview of sampling and outlines sampling activity. We also have a standard operating procedure which outlines how sampling is carried out. The sampling plan will be reviewed and updated as necessary at quarterly meetings attended by the team sampling group which consists of the Food Team Lead, Team Principal EHO's and the Formal Sampling and Informal Sampling Lead Officers. At quarterly planning meetings- sampling targets are set for the quarter; the previous quarter's sampling is reviewed and any potential funding opportunities to fund sampling activities are discussed. This was a new regime brought in during 23/4 to help to increase and support sampling activity across the team.
- 3.13.2 Our appointed Public Analyst is Lancashire County Council Scientific Services, and our appointed Food Examiner is: Food, Water and Environmental Microbiology Services, York, UK Health Security Agency (UKHSA). The authority is awarded a credit allowance to undertake microbiological sampling from UKHSA. Sampling can be undertaken by all appropriately competent Officers in the team with support provided if required by the team sampling group where required. Formal projects will be led by the formal/informal sampling lead officers.
- 3.13.3 Sampling activity by the team during 24/25 was broadly similar to 23/24. Inland – the majority of samples were microbiological samples including both food samples and swabs. Border Control Post samples were largely tested for pesticide residues but also for aflatoxins, chemical migration from food contact materials etc. Border Control Sampling is largely prescribed as part of import requirements, but we also do surveillance sampling at the airport considering the national monitoring plan. All failed samples are followed up which may result in foods not being permitted entry into the UK from the Border Control Post or products being seized, food hygiene ratings of businesses being reduced, working with food businesses to help ensure improvements, notification to the Food Standards Agency, national food product recalls, information gathering for regional/national surveys etc. 30 failed samples were followed up last year which helps to drive food safety improvements. 6 allergen samples were taken during the year which is an increase on the previous year.

Table 12. Sampling Activity

Samples Taken	2023/24	2024/25
Border Control Post (Manchester Airport)	73	63
<i>Unsatisfactory result</i>	<i>4</i>	<i>5</i>
Inland	143	126
<i>Unsatisfactory result</i>	<i>26</i>	<i>25</i>
Total	216	189

3.13.4 To help fund sampling we cost recover samples taken at the Border Control Post as part of import requirements, we utilise microbiological sampling allocations available from UKHSA and we bid for grant monies, for example from the FSA.

3.14 Food Safety Incidents

3.14.1 The service responds to food incidents in accordance with the Food Law Code of Practice and has the appropriate systems and procedures in place.

3.14.2 All Officers have access to the Food Standards Agency's FSA Link platform.

3.14.3 Lead Food Officers receive emails directly from the FSA in relation to food alerts/incidents and will respond accordingly.

3.14.4 Where a food safety alert requires the authority to take appropriate action in response to the incident, such action will take priority over other work, and if necessary, resources are drawn in from other teams to assist.

3.15 Export Health Certificates

3.15.1 The team operates an Export Health Certificate Service to support local businesses exporting primarily to the EU. Certain food products require certification and checking before export. Staff must go through specific training and need accrediting by DEFRA to be able to issue Export Health Certificates. We currently have 4 staff trained to do this. The service is run on a cost recovery basis. We also provide attestations for businesses in Manchester where they are required to enable them to export. This is where there isn't a formal requirement for an Export Health Certificate, but where there is a requirement for an attestation that the food business is operating according to Food Safety requirements.

3.15.2 9 attestations were provided to businesses between 1st April 2024 and 31st March 2025. Of these, one was for the EU therefore the EU checks did not lead to an increase in requests for export health certificates or attestations.

3.15.3 There was less work on exports over this year compared to the previous year due to a business, who were a regular fish exporter, moving their premises out of the Manchester City Council area.

3.15.4 The exports team carried out internal refresher training to ensure that skills and knowledge around exports are not impacted by the reduced amount of work this year.

3.15.5 We are expecting the number of Export Health Certificates issued to increase next year as we have been approached by a business who would like us to issue them.

3.16 Control of Investigation of Outbreaks and Food Related Infectious

3.16.1 The team liaises with Manchester City Council colleagues in Public Health and external colleagues in the Health Protection team within the UK Health and Security Agency on matters relating to the control and investigation of food related infectious disease. When required an Outbreak Control Team is convened in accordance with criteria laid down in the Infectious Disease Outbreak and Control Plan and includes representatives from the Council and all relevant partners. The team follows the “Greater Manchester Multi-Agency Outbreak plan”. In relation to Port Health matters, we are the Port Health Authority for Manchester Airport and follow the “Port Health Incidents Manchester Airport Response Plan”. Also, Manchester City Council Outbreak Control procedures are followed.

4.0 Resources

4.1 Financial Allocation

4.1.2 The Food Team Budget for 25/26 is:

- Expected revenue expenditure: £1,590,939
- Expected Income: £244,375
- Total Expenditure: £1,346,564

4.1.3 A budget of £95,427 has been agreed for payments to an appointed contractor to complete food hygiene and standards inspections.

4.2 Staffing Allocation

4.2.1 The team permanent structure currently consists of 4 managers and 18 officers plus two Officers on a fixed placement.

Table 13. Staffing

Full time Officers	Job Title	Food Safety Code of Practice Authorisations
Permanent		
1 FT	Team Manager – EHO	Lead Food Officer
3 FT	Team Leads (Principal - Environmental Health Officer)	Currently 2 Lead Food Officers (including Team Manager) – Full authorisation. Other 2 Team Leads are completing competencies to also become Lead Food Officers
15 FT	EHOs	13 Full authorisations, 1 Working towards CIEH Registered Environmental Health Practitioner Status and completing food competencies (completed <i>Nov 2025</i>) , 1 vacancy (<i>recruited to Jan 26</i>)
1 PT	Technical Officer	Higher Certificate in Food Premises Inspections. Authorised for Food Standards re: Food Allergens
1 PT	Technical Officer	EH degree and EHRB Registered. Currently updating competencies as recently joined the team. Long term sick (<i>member of staff left the Council in November 2025 – we are recruiting to the vacancy</i>)

1 FT	Technical Officer	Working towards the Higher Certificate in Food Control – is due to qualify later this year as a Food Safety Practitioner.
1 FT	Regulatory Support Officer	Authorised as a Regulatory Support Officer (RSO)
2 FT	Graduate EHO (1-year placement)	Working towards CIEH Registered Environmental Health Practitioner Status and completing food competencies.
Temporary		
1 FT	Regulatory Support Officer	Authorised as a Regulatory Support Officer (RSO)
Border Control Post		
1 FT	Official Veterinary Surgeon	Employed through a veterinary contract – fully authorised
1 FT	EHO/Practitioner	EHO staff work 1 week in 8 from a pool of staff from the main food team – fully authorised
Contract Food Inspections		
6	EHOs	Currently have 6 EHO's working temporarily on food inspections. - fully authorised

4.2.2 FTE resource allocated (not including Managers) = 12.1 FTE

- 15 EHO's
- 2 Technical Officers
- 2 Regulatory Support Officers
- 2 Graduates
- 6 Contractors (equates to around 3 staff)

4.2.3 For food standards (not including Managers) = 6.3 FTE

- 15 EHO's
- 2 Technical Officers
- 2 Regulatory Support Officers
- 2 Graduates
- 6 Contractors (equates to around 3 staff)

4.2.4 In addition to the above, a support team undertakes essential work in relation to all administrative duties related to delivering the food service plan including filing inspection records, monitoring newly registered and unrated premises, checking data quality and assisting with FSA returns. This is an ongoing

resource requirement, and tasks are currently carried out by 5 Full time equivalent (6 individuals) administration staff.

- 4.2.5 Approximately 1400 inspections will be outsourced to our contractor throughout the year. For the first 2 quarters just FH inspections will be done by contractors. This enables the team to get used to the FSDM before we train up contractors.

4.3 Staff Development

- 4.3.1 An annual training plan is compiled each year considering significant training needs for the team. It also considers CPD allowance for each team member. Individual training needs are constantly reviewed for all staff members at regular 121's which tend to be held every 6-8 weeks. The competency of each staff member is assessed when they start at the Council but is also a continual process. For new staff members including contract and agency staff the FSA's competency framework (now competency standard) is followed. 1 Officer is currently on a development plan to become a Food Safety Practitioner. This is hoped to be completed over the next few months.
- 4.3.2 Before officers are authorised to undertake formal enforcement, they are assessed to ensure that they hold the appropriate qualifications, have sufficient experience of food law enforcement and are properly trained and competent. Records of qualifications, training and experience are documented and link directly to the officer authorisation procedure. In accordance with the Food Law Code of Practice the Lead Food Officer and all other Officers must provide evidence to demonstrate that they comply with the competency requirements set out in the code and must complete 20 hours of CPD (10 Core Hours and 10 related to 'other professional matters'). Staff training is provided in the following ways:
- Externally provided training courses for example the Greater Manchester Food Liaison Group, FSA, DEFRA, CIEH, APHA, DEFRA, UKHSA
 - Ongoing in-house training including at meetings to discuss new legislation and guidance and agree a consistent interpretation / approach
 - Cascade training
 - Training and instruction provided on the job or on a one-to-one basis
 - Accompanied visits
 - Bespoke inhouse training arranged where external trainers deliver training to the team
 - Online training
 - MCC e-learning for the softer skills training
 - FSA Consistency exercises
- 4.3.3 In relation to the Border Control Post, we currently have 8 Environmental Health staff on a rota. Each Officer does a week at a time on the rota.
- 4.3.4 We have an Official Veterinary Surgeon (OVS) contract and have regular meetings with the provider. We support their training needs where appropriate
-

e.g. whilst we tend to have the same OVS that works at the airport – we support the provider sending trainee OVS's to the Border Control Post for training with our OVS. The OVS Contract company provide technical support to their staff.

5.0 Quality Assessment and Internal Monitoring

5.1 Food Programme

- 5.1.1 Food programme meetings are held every 3-4 weeks throughout the year – sometimes more frequently dependent on the need. The meetings are attended by the Manager of the Food, Health and Safety and Airport Team, the Principal EHO who is the food programme lead, Principal EHO's in the Food Team and compliance and support data and intelligence staff. Such meetings look at allocations, check data quality, discuss any issues, discuss potential service improvements etc.
 - 5.1.2 Food Programme dashboards are in place to monitor the food programme. Officers have their own dashboards to see inspection allocations.
 - 5.1.3 Principal EHOs undertake regular performance monitoring with officers to ensure that all allocated work, including inspections are meeting the required targets set out in the food law code of practice and service targets. Also to identify any training needs. Meetings are held regularly with the contractor who provides Officers to carry out contract food hygiene and standards inspections to check where inspections are up to, discuss any issues. Reports are presented by the contractor at these meetings which usually involves the manager of the Food, Health and Safety and Airport Team and the Principal EHO who is the food programme lead. Reports are also provided by the Contractor as and when required. The Manager of the Food, Health and Safety and Airport Team, the Principal EHO who is the food programme lead and compliance and support data and intelligence staff can also access the contractors' inspection portal to check on inspections.
 - 5.1.4 Contractor inspection paperwork is checked for data quality by a Lead Food Officer and Principal EHOs.
 - 5.1.5 The Compliance and Performance team support data and intelligence staff and Managers run various reports from the Management Information System to check data quality.
 - 5.1.6 Principal EHO's will discuss with Officers in their team at 121's (roughly every 6-8 weeks) progress with food programme/unrated allocations and workloads will be adjusted if required.
 - 5.1.7 The Manager of the Food, Health and Safety and Airport Team will discuss with Principal EHO's at 121's (roughly 6-8 weeks) also at Food Team Managers weekly catch ups, Officer's progress with food programme/unrated allocations and workloads will be adjusted if required.
 - 5.1.8 The food programme is also a standing agenda item at every full team meeting which are held around every 6-8 weeks. A standing agenda item at the full team meeting also involves a consistency topic. A consistency topic
-

may be raised by a member of staff, it could also be highlighted following data quality checks, may be following a change in procedure/legislation etc.

5.1.9 FSA returns are signed off involving Senior leaders.

5.1.10 Meetings are occasionally held with Senior Leaders to review progress of the food programme.

5.1.11 Accompanied inspections are periodically carried out.

5.2 General

5.2.1 All service requests have target response times/ fields that should be completed etc and these can be checked. Random checks of service requests are also carried out, by Managers, to check the quality of responses, correct use of the management information system etc.

5.2.2 Any Primary Authority advice goes through an internal peer review process before being issued. Regular catch ups are held with the Official Veterinary Surgeon contractor to discuss service provision.

5.2.3 Catch ups are held with our Principal Officer Airport Lead and Manchester Airport Group to discuss service provision re: the Border Control Posts. Same with our cargo handler at Manchester Airport.

5.2.4 Due diligence checks are carried out once a year of major contracts. For the Food, Health and Safety and Airport team this involves 2 contracts - One for food hygiene/standards inspections and one for the Official Veterinary Surgeon provision at the Border Control Posts.

5.2.5 We receive audits from the Animal and Plant Health Agency (APHA) and the FSA regarding the operation of the Border Control Posts. Such audits include an assessment of paperwork.

5.2.6 The Manager of the Food, Health and Safety and Airport Team and Principal EHO's have meetings periodically to look at workloads and data quality across the team.

5.2.7 Review of complaints against the service and review against the service plan

6.0 Review

6.1 Review Against Previous Service Plan

- 6.1.1 As a Competent Food Authority we must set out a process for reviewing and reporting delivery of the service plan. This should include information on the previous year's performance against the service plan and any specified performance targets and performance standards and targeted outcomes.
- 6.1.2 Last year's priority areas for improvement in the service plan were:
- 6.1.3 **To transition to the new Food Standards Delivery Model towards the end of 24/25** - We started inspecting with the new FSDM risk rating on the 1st of April 2025. Inspection paperwork has been updated, and training has been delivered to staff including consistency training which will be ongoing. We switched on the new system in our management information system in October and are currently working to fully understand the resources required around this. We cannot complete all the due FS inspections this programme. We met with the FSA to discuss our approach which is to inspect on a risk-based approach to ensure that this backlog contains no priority risk interventions. We expect a backlog of around 1043 medium risk businesses that will be carried forward into the 2026/27 programme. This backlog has been discussed with the FSA, and they have confirmed that most local authorities are in a similar position. At this time, work to be undertaken to fully understand the resource implications of the new FSDM. There are several actions currently being considered to tackle the backlog, including, the option to carry out remote assessments in a range of businesses and the use of more partial inspections targeted on specific issues are working to switch over to the new risk rating in our management information system imminently and are in contact with the FSA re: this.
- 6.1.4 **To move to a mobile solution for FH/FS inspections** - All Officers inhouse have been allocated mobile tablets and have been familiarising themselves with the tablets. Testing and development of the tablets has occurred throughout the year. The tablets require further development until they will be used on site for FH and FS inspections. Development will continue during this year.
- 6.1.5 **To fully transition to a new Management information system provider** - We have fully transitioned to a new management information system provider. Further development is required in some areas, but a huge amount of development has occurred particularly around management and oversight of the food programme including the development of dashboards etc. For both Managers and Officers. The dash boards also include information re: revisits, FHRS rescores, service requests.
- 6.1.6 **To work towards the relocation of the Border Control Post at Manchester Airport including the approval process as a Border Control Post** - We
-

continue to engage with Manchester Airport Group and will provide support in the Border Control Post application process with APHA and the FSA. The date of relocation is not yet finalised. In the interim we continue to ensure that the current BCP complies with requirements to be a BCP and continue to ensure that any repairs are carried out.

6.1.7 To improve food allergen compliance and undertake formal enforcement action where required - We finalised an allergen training package for businesses and started to roll this out. We will be following up with businesses that attended the training throughout this year to measure the effectiveness of the training. Assessment of the training carried out to date has shown that although very resource intensive we are seeing significant allergen compliance improvements in some businesses who struggled with allergen compliance for years. We carried out allergen sampling at businesses and are following up with one business where non compliances were established. This business has been sent through to our Legal team to instigate legal proceedings.

6.1.8 To ensure food businesses receive timely revisits in line with the Food Law Code of Practice - During 24/25, 157 revisits were undertaken for food hygiene issues and 58 for food standards issues. During 2023/24 re-visits were undertaken at 235 premises for food hygiene and 46 for food standards. The revisit numbers did reduce last year to the previous year. This can be in part explained by the move to a new management information system which required development to enable visibility and monitoring of revisits. It will be a priority area to increase revisits this next year.

6.2 Priority Areas / Areas for Improvement

6.2.1 Priority areas of focus are to:

- Monitor the transition/implementation to/of the FSDM to ensure that staff are suitably trained and have consistency exercises. To ensure our management information system is properly configured for the FSDM and can do the reporting that we need. To monitor resources around the FSDM and any impacts to the FH programme/other regulatory areas and assess if there are resource issues.
 - Assess the revised Food Law Code of Practice and Practice Guidance in relation to both FH and FS and any efficiencies/resources needed to implement changes.
 - Continue to feed into the development of a mobile solution and look at AI capability for FH/FS inspections
 - Continually review and feed into the development of our management information system.
 - Work towards the relocation of the Border Control Post at Manchester Airport including the approval process as a Border Control Post and to contribute and work towards the move to reduce EU import checks.
 - Improve food allergen compliance and undertake formal enforcement action where required
-

- Ensure food businesses receive timely revisits in line with the Food Law Code of Practice.

6.2.2 To do this we have/ will:

- Secured contractors and a budget to outsource around 1400 inspections
- To recruit to an officer's post who retired
- Assess potential resource implications of the new Food Standards Delivery Model, potential resource implications of the new Food Law Code of Practice and Practice Guidance and workloads across the team and to make a business case for extra resource. To continue to link in with the FSA where required.
- The new management information system was rolled out on the 17 June 24. To contribute to the continued development of this.
- Have recruited a Temporary Regulatory Support Officer until 31st March 26 who can help support the team with the FSDM and the roll out of allergen training.
- Have recruited 2 Graduate EHO's who will provide business advice support to the team.
- Continue with the development of mobile tablets for inspections and expected efficiencies brought with this.
- 6 Weekly catch-up meetings are to be held with the FSA re: the implementation of the BTOM and the relocation of the BCP
- We will link in with Manchester Airport Group re: the relocation of the BCP
- Regular catch-up meetings with DEFRA and APHA re: the BTOM and move to reduce EU import checks.
- Closer monitoring of required re-visits and appropriate allocation of resources to ensure completion. Manager and Officer dashboards highlight due revisits so that they can be seen and monitored.

6.2.3 The implementation of the Food Standards Delivery model is a significant change for the team. It is expected that during training and implementation phases there will be periods of time when team productivity reduces. Team performance will be continually monitored, and additional use of contracted officers will be considered. Any significant issues will be raised with the FSA.
