

## Audit Action Plan for Bridgend County Borough Council

**Audit Date: 20-25 March 2013**

**Action Plan updated: 27 August 2015**

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.16 (i) Ensure that future Food Law Enforcement Service Plans are developed in full accordance with the Service Planning Guidance in the Framework Agreement. [The Standard – 3.1]	1/4/2014	<p>The 2014/15 FLESP will include:-</p> <ul style="list-style-type: none"> <li>• Details of the number and type of interventions to be completed in each of the food business risk bands for food hygiene and food standards</li> <li>• The Authority's approach to businesses rated as low risk for food standards</li> <li>• Arrangements for internal monitoring for Food Standards</li> <li>• An estimate of the resources required to carry out the full range of statutory food standards enforcement activities against those available.</li> <li>• An indication of whether the cost of providing the service is a net increase or decrease on previous years' cost.</li> </ul>	Completed	<p>Some of the details required have been included in Directorate Service Plans and were available, however, it is accepted that the information should be included in the FLESP.</p> <p>Required changes in FLESP.</p>

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5.13(i) Review the Scheme of Delegation and officer authorisations to include the appropriate provisions of the Official Feed and Food Control (Wales) Regulations 2009 and the Trade in Animals and Related Products (Wales) Regulations 2011. [The Standard – 5.1]	Completed	The scheme of delegation and officer authorisations have already been updated to include the appropriate provisions of the Official Feed and Food Control (Wales) Regulations 2009 and the Trade in Animals and Related Products (Wales) Regulations 2011.	Completed	Scheme and authorisation documents amended.
5.13(ii) Ensure contractors and temporary staff are appropriately authorised under current legislation in accordance with their qualifications, training and competencies. [The Standard –5.3]	Completed	Ensure any temporary or contract staff appointed are appropriately authorised – this requirement will be made explicit in the authorisation procedure.  Ensure relevant officers are authorised to carry out AES	Completed	All contractors used since audit appropriately authorised.
5.13(iii) Ensure that relevant qualification and training records of staff (including contractors) are maintained on file. [The Standard – 5.5]	Completed	Maintain officer training records, including records for temporary and contract staff on file.	Completed	Qualification and training records being maintained.
<u>Food Hygiene</u> 7.16(i) Ensure that food premises interventions are carried out at a frequency specified by the Food Law Code of Practice. [The Standard – 7.1].	21/6/2013	Carry out food premises interventions at the frequencies specified in the Food Law Code of Practice.	Completed	The number of premises not subject to intervention within the required frequencies was very small compared to the

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				number of premises in the inspection programme. These were generally lower risk food businesses. Frequencies generally being met.
7.16(ii) Carry out interventions and approve establishments in accordance with the relevant legislation, the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.2]	01/04/2014  Completed  1/04/2014	<ul style="list-style-type: none"> <li>Staff to be briefed on approvals procedure and requirements of Code of Practice in respect of conditional approvals.</li> <li>Amend Alternative Enforcement Procedure and train staff to ensure no premises are risk rated on the basis of an alternative enforcement intervention</li> <li>Ensure information obtained from AES is reviewed by an appropriately qualified and authorised officer. AES procedure to be amended accordingly.</li> </ul>	Completed	Improvements implemented to process of approval and AES scheme.
<u>Food Standards</u> 7.29(i) Ensure that food premises interventions are carried out at a frequency specified by the Food Law Code of Practice. Priority should be given to high risk	1/4/2014	Details of food standards interventions programme to be provided in 2014/15 FLESP. Progress against the plan to be subject to internal monitoring. Priority to be given to higher risk businesses.	Revised date for completion: 29/02/16	High risk inspections undertaken on time.

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establishments that have not been inspected in accordance with the Food Law Code of Practice. [The Standard - 7.1]				
7.29(ii) Carry out interventions at food establishments in accordance with relevant legislation, the Food Law Code of Practice and Practice Guidance, including the use of appropriate inspection forms. [The Standard - 7.2]	01/04/2014	Develop and implement a revised Food Standards Inspection form and brief staff on its use.	Revised date for completion: 29/02/16	Risk ratings being applied following inspection only. Development of appropriate inspection forms undertaken.
7.29(iii) Assess the compliance of food businesses to the legally prescribed standards and in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard - 7.3]	30/06/2014	Amend risk rating scheme and train staff to implement changes.	Revised date for completion: 29/02/16.	Development of appropriate inspection forms undertaken.
7.29(iv) Set up, maintain and implement documented procedures for the range of interventions it carries out. [The Standard - 7.4]	1/4/2014	Procedures to be developed. Develop alternative enforcement policy and procedure and a revisit procedure.	Revised date for completion: 29/02/16.	AES procedure no longer required as not using scheme.
8.8(i) Review its complaints procedures to include guidance to officers on dealing with food originating from outside the EU. The procedure should also make reference to the authority's procedure for investigating cases of	Completed	Amend food complaints procedure to include guidance on food originating from outside the EU and reference to the procedure for investigating notification of cases of foodborne illness	Completed	Complaints procedure amended.

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foodborne illness. [The Standards – 8.1]				
13.6(i) Ensure the procedure for dealing with sporadic cases of food-related infections out of office hours, is referred to in the Communicable Disease Notification Procedure and the procedure is fully implemented by officers when conducting investigations. [The Standard – 13.2]	Completed	Amend Communicable Disease Notification procedure to include reference to the arrangements out of office hours. Provide staff update training to ensure correct procedures followed.	Completed	Communicable Disease Notification Procedure amended & improvements in implementation.
15.19(i) Complete the review of its Enforcement Policy ensuring it is in accordance with the Food Law Code of Practice and official guidance. [The Standard – 15.1]		Finalise review of enforcement policy and implement staff training programme.	Revised date for completion: 29/05/16.	Improvements made to Food Safety Enforcement Policy and new Public Protection Enforcement Policy under development.
15.19(ii) Set up, maintain and implement documented procedures for follow up and enforcement actions in accordance with the Food Law Code of Practice and official guidance. [The Standard - 15.2]	1/3/2014	Revised enforcement policy to include Primary/Home Authority considerations and incorporate:- <ul style="list-style-type: none"> <li>• A procedure for dealing with non-compliances where Bridgend C B Council is the fbo.</li> <li>• A requirement for officers to notify in writing that works have been satisfactorily completed to comply with notices.</li> </ul>	Revised date for completion: 29/02/16.	Revised prosecution decision checklists in place and improvements to other procedures, including use of RANs.

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	30/6/2014	<ul style="list-style-type: none"> <li>• A procedure for serving RANS</li> <li>• Requirement to ensure accurate records are kept of receipt and time, place and method of disposal of any food seized and/or detained.</li> </ul> <p>Develop a procedure on the investigation and reporting of offences incorporating a requirement for a record to be made of public interest and evidential tests, enforcement policy and CPIA considered.</p>		
15.19(iii) Ensure that food law enforcement is carried out in accordance with the Food Law Code of Practice, centrally issued guidance and the authority's own documented procedures and enforcement policy. [The Standard - 15.3 and 15.4]	30/06/2014	Develop and deliver enforcement procedures training for staff and strengthen internal monitoring of enforcement.	Revised date for completion: 29/02/16.	Provision of Court details on notices, service on correct FBOs, improved record of prosecution decisions.
<u>Food Hygiene</u> 16.9(i) Maintain up to date, accurate and comprehensive records for all establishments in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard –	Completed  Completed  01/04/2014	<ul style="list-style-type: none"> <li>• Officers to check food business registration details are up to date during interventions</li> <li>• Copies of new registration forms to be electronically attached to the premises record on APP</li> </ul>	Revised date for completion: 29/02/16.	Improvements in consistency of records, AEs records and application of timescales in reports.

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16.1	<p>Completed</p> <p>Completed</p> <p>1/4/2014</p> <p>Completed</p> <p>1/4/2014</p>	<ul style="list-style-type: none"> <li>• Internal monitoring to check hard copy and database records are consistent.</li> <li>• AES questionnaires to be maintained on file or scanned to premises record</li> <li>• Officers to be reminded of the requirement for timescales to be included on correspondence for completion of remedial works and copy correspondence to Head Office as appropriate</li> <li>• Complete revision to inspection form to enable officers to better demonstrate their assessment of business compliance with centrally issued guidance.</li> <li>• Brief officers on requirements relating to recording of HACCP information.</li> <li>• Strengthen internal monitoring to ensure all aspects of centrally issued guidance which require evaluation are reflected in officers intervention records.</li> </ul>		

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<u>Food Standards</u> 16.14(i) Maintain up to date, accurate records in a retrievable form on all food establishments in accordance with the Food Law Code of Practice and centrally issued guidance. These records should include reports of all interventions, the determination of compliance with legal requirements made by the officer and details of action taken. [The Standard – 16.1]	Completed  01/04/2014	<ul style="list-style-type: none"> <li>• Deliver officer training to ensure interventions are correctly coded on database.</li> <li>• Review and revise inspection form to enable officers to better demonstrate scope of interventions, effective assessment of compliance, basis for risk ratings applied and improve consistency.</li> </ul>	Revised date for completion: 29/02/16.	Improvements in accuracy of inspection database coding and records.
16.14(ii) Ensure that records of food standards interventions and key details of business operations are stored in such a way that they are easily retrievable and available for 6 years [The Standard - 16.2]	Completed	<ul style="list-style-type: none"> <li>• Review and amend inspection procedure to provide officers with guidance on how and where records should be stored/maintained.</li> </ul>	Completed	Intervention records available and retrievable from establishments database.
17.5(i) Record all complaints received together with the actions taken in response. [The Standard – 17.3]	1/4/2014	Put in place new complaint code and record all complaints on the Civica APP database. This will include detailed action diaries of all activities carried out in response.	Completed	Improvements to complaint recording including creation of database record.
19.11(i) Fully implement the internal monitoring procedures and ensure records are kept for at least 2 years. [The Standard – 19.1 and 19.3]	1/4/2014	<ul style="list-style-type: none"> <li>• Review and implement the revised internal monitoring procedure for Food Standards ensuring records of internal monitoring are kept on file.</li> </ul>	Revised date for completion: 29/02/16.	Improvements to procedure and adopted for food standards service.



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	Completed	<ul style="list-style-type: none"><li>Strengthen internal monitoring of food hygiene enforcement actions to ensure requirements of Food Law Code of Practice are being met.</li></ul>		