

Updated Action Plan for Central Bedfordshire Council

Audit date: 10-11 September 2013

Action Plan updated: 16 October 2014

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.7(i) Further develop the Food and Feed Plan in accordance with the Service Planning Guidance in the Framework Agreement, to include all demands on the Feed Service, feed premises profiles and a feed interventions/inspections programme. The Plan should also include a comparison of the resources required to carry out the full range of statutory feed law enforcement activities against the resources available to the Service. Ensure that the Plan is approved by the appropriate Member forum or senior delegated officer. [The Standard - 3.1 and 3.2]</p>	<p>31/03/14</p>	<p>Food and Feed Plan to be reviewed and developed, where necessary, for 2014/15 to include detailed information relating to the feed law Service.</p> <p>The Plan is also to be approved by the Executive Member – Sustainable Communities – Services.</p>	<p>Completed</p>	<p>Food / Feed Service Plan has been reviewed and amended to include detailed information with regards to the Feed Service and its enforcement work.</p> <p>Plan was approved by Executive Member for Community Services on 1 April 2014.</p> <p>A review of feed enforcement resources is to be carried out separately and included in the Service Plan.</p>
<p>3.1.7(ii) Carry out an annual performance review based on the service delivery plan and ensure that any variances identified are addressed in subsequent years' service planning. [The Standard – 3.2 and 3.3]</p>	<p>30/04/14</p>	<p>Quarterly reviews will be carried out of performance against the plan. Where issues are noted these will be addressed during the lifetime of the plan. This will be a standing indicator going forward.</p>	<p>Completed</p>	<p>Review of progress against plan as part of minuted team meeting (10/07/14)</p>

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3.1.9(i) Ensure that documented policies and procedures for the feed law enforcement service are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance. [The Standard - 4.1]	31/08/14	<p>Existing policies and procedures to be reviewed and new policies and procedures to be developed as necessary.</p> <p>All policies and procedures to be reviewed annually thereafter and following any changes in legislation or guidance.</p>	Completed	<p>Previous existing policies have been reviewed and amended where necessary.</p> <p>A new “Animal Feed Management System” (AFMS) has since been developed and introduced, incorporating a range of procedures, as required. All documents to be reviewed, in accordance with the procedure for ‘Review and Document Control’ on an annual basis, or where any changes take place to legislation or centrally issued guidance. (see accompanying AFMS)</p>
3.1.9(ii) Set up, maintain and implement a control system for all documentation relating to its enforcement activities. [The Standard - 4.2]	30/04/14	<p>Feed Lead Officer (FLO) to review current documentation to ensure still relevant and updated where necessary.</p> <p>FLO will control relevant documents by making sure current electronic issues are only available to officers in PDF/Read-Only format.</p> <p>Documents to be reviewed annually and amended where necessary.</p>	Completed	<p>All previously existing documentation has been reviewed and amended, where necessary.</p> <p>Both the AFMS and all related documents now made available for general access to officers in a specific “Feed Hygiene” folder in the Authority’s S:Drive directory. Documents are available in read-only format, unless editing required by officers (ie. template letters etc).</p> <p>The new AFMS includes a procedure for ‘Review and</p>

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				Document Control', as above.
3.1.15(i) Set up, maintain and implement a documented procedure for the authorisation of officers based on their competence and in accordance with the Feed Law Enforcement Code of Practice. [The Standard - 5.1]	31/08/14	Procedure to be developed as necessary.	Completed	Procedure has been developed and introduced as part of the AFMS. It has also been shared with EETSA local authorities as a regional 'draft' template for Authorities to use or develop to suit own requirements.
3.1.15(ii) Review current authorisations to ensure that all officers are authorised to the appropriate level under relevant legislation, in line with their individual qualifications, training, experience and competencies. [The Standard – 5.3]	31/01/14	Current authorisations to be reviewed for all relevant officers. Authorisations to then be reviewed as part of annual Service review.	Completed	Authorisation letters updated and recirculated, new updated legislation list also circulated to officers.
3.1.23 Develop, maintain and implement a documented procedure to ensure that the feed premises database is accurate, reliable and up to date and to ensure that accurate information on feed law enforcement activity is reported in official returns to the Agency. [The Standard – 11.2]	31/08/14	Procedure to be developed as necessary. Official returns to the Agency to be checked and signed off by FLO and Service Manager.	Completed	Relevant procedure has been developed and introduced as part of the AFMS.
3.2.7(i) Ensure that feeding stuffs premises inspections are both risk rated and carried out at appropriate frequencies as specified by the Feed Law Enforcement Code of Practice. [The Standard - 7.1]	30/04/14	All relevant premises to be risk-rated and inspected at appropriate frequency with reference to new risk-scoring system in upcoming Feed Law Code of Practice (2014) and provision for 'earned recognition'.	Completed/ On-going	Feed businesses that received an inspection have been risk rated in accordance with the Feed Law Code of Practice (2014) taking into account the provision for earned recognition status. Future inspections to be carried

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				out at appropriate frequencies.
<p>3.2.7(ii) Carry out interventions and inspections in accordance with the relevant legislation, Feed Law Enforcement Code of Practice and centrally issued guidance and the Authority's own policies and procedures. The Authority should take appropriate follow up action on any non-compliance found in accordance with its enforcement policy. [The Standard - 7.2 and 7.3]</p>	On-Going	<p>Interventions/inspections are already carried out in accordance with relevant legislation, Code of Practice, centrally issued guidance and Authority's Enforcement Policy, although other relevant policies and procedures are yet to be reviewed or developed. FLO to monitor any follow-up action required for any non-compliance(s) and ensure it is carried out in a timely manner and in accordance with the Authority's Enforcement Policy. (Where FLO is the inspecting Officer, the appropriate Service Manager will monitor any follow-up action for any non-compliance(s) found).</p>	Completed/ On-going	<p>Procedure(s) has been developed and introduced as part of the AFMS. Future inspections and interventions will continue to be carried out in accordance with them. Any follow-up action required for non-compliance(s) found will be monitored by the FLO, or newly appointed Principal Officer for Trading Standards or relevant Service Manager, as appropriate.</p>
<p>3.2.7(iii) Set up, maintain and implement documented procedures for the range of interventions/ inspections carried out. [The Standard - 7.4]</p>	31/08/14	<p>Procedures to be developed and implemented. (EETSA Agriculture Group currently looking at developing a range of template procedures / work instructions as part of coordinated Regional work).</p>	Completed	<p>A range of relevant procedures have been developed and introduced as part of the AFMS. (NB: EETSA is still currently developing template procedures / work instructions. Once approved, the relevant AFMS document will be reviewed and amended, as appropriate).</p>

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3.2.13 Set up, maintain and implement documented procedures for the inspection and sampling of feeding stuffs. [The Standard - 12.3]	31/08/14	Procedures to be developed and implemented.	Completed	Procedures have been developed and introduced as part of the AFMS.
3.2.16 Set up, maintain and implement documented procedures for the full range of enforcement actions in accordance with the Feed Law Enforcement Code of Practice and official guidance. [The Standard - 15.2]	31/08/14	Procedure to be developed and implemented.	Completed	Procedures have been developed and introduced as part of the AFMS.
3.2.19 Develop, maintain and implement a documented policy and procedures in relation to complaints about feed and feed establishments. Procedures should include guidance on referral arrangements to other authorities. [The Standard – 8.1]	31/08/14	Existing policies and procedures to be reviewed and new policies and procedures to be developed as necessary.	Completed	Procedure has been developed and introduced as part of the AFMS.
3.3.3 Set up, maintain and implement documented internal monitoring procedures to include quantitative and qualitative monitoring of feed law enforcement activities across all areas of the Standard. The procedure should reflect the monitoring activities already undertaken in practice and should be aimed at verifying the Service's conformance with relevant legislation, official guidance and the Standard. Records of monitoring checks should be maintained. [The Standard - 19.1, 19.2 and 19.3]	31/08/14	A monitoring system is to be put in place for all activities undertaken in Public Protection to ensure compliance with standards etc. relevant to the area of work. Feed law enforcement will be one of the areas tested for compliance with all areas of the Standard.	Completed/ On-going	An 'Internal Monitoring' procedure has been developed and introduced as part of the AFMS. A wider internal monitoring procedure for all duties in Public Protection is in the process of being developed.

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<p>3.3.7 Maintain up to date accurate records in retrievable form for all feed establishments in accordance with the Feed Law Enforcement Code of Practice These records shall include relevant feed registration documents and be retained for a minimum six year period. [The Standard – 16.1 and 16.2]</p>	31/08/14	<p>Mostly in place at time of the audit. Improvements to take place to ensure all visit and sample records are up-to-date and relevant information is migrated from old database to the new current database.</p> <p>Missing registration forms were destroyed due to movement of offices and into a 'paper-less environment'. A mail-merge is to be developed and sent to those businesses where no registration form currently exists, to ensure registration/approval activities, premises details are details are still relevant and applicable.</p>	Completed	<p>All previous inspection and sample history has now been migrated from old database to new database, dating back to 2006.</p> <p>Mail-merge has now been completed for those businesses where no registration form exists. (156 businesses were included, all but 15 have responded – these remaining businesses will be asked to complete the form during their next routine inspection.)</p>