

Updated Action Plan for Cheshire East Borough Council

Audit date: 11-13 June 2013

Action Plan updated: 23 November 2016

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS / REVISED DATE	ACTION TAKEN TO DATE
<p>3.1.7 Ensure that future Service Plans are in full accordance with the Service Planning Guidance in the Framework Agreement, to include details of the breakdown of both staff and financial resources required to carry out the full range of statutory food law enforcement activities, and an accurate reflection of the premises profile and planned annual interventions programme. [The Standard – 3.1]</p>	<p>31/08/13 and subsequent editions of the Service Plan</p>	<p>The 2013/14 and future Service Plans will, where possible, contain a breakdown of staff resources and financial allocation. The premises profile identified in the Service Plan will be cross referenced to the submitted LAEMS return.</p>	<p>Completed.</p>	<p>The Environmental Health resource staff and, where possible due to the sharing of functions, financial resource allocation was detailed in the 2013 – 2014 Service Plan.</p> <p>Following the combining the Food Standards work into Environmental Health, the 2014 – 2015 Service Plan will now show both service areas in one plan</p>
<p>3.1.18 (i) Develop the documented procedure for the authorisation of officers based on their competence and in accordance with the Food Law Code of Practice. [The Standard – 5.1]</p>	<p>30/11/13</p>	<p>The existing documented Authorisation Procedure will be updated with cross referencing to individual Officer levels of competency and powers.</p>	<p>Completed</p>	<p>The new Authorisation Procedure FS1 is now cross referenced with individual Officer competency and powers. Accompanied inspections of officers are being undertaken by the lead officer.</p>
<p>3.1.18 (ii) Review and update current authorisations as necessary to ensure that all officers are appropriately authorised under relevant legislation in accordance</p>	<p>30/11/13</p>	<p>Officer authorisations will be audited to ensure correct authorisation. The authorisation covering the Food and</p>	<p>Completed</p>	<p>Officer authorisations were audited and new authorisations including new Food and Environment Protection Act</p>

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with their levels of qualification, experience and competency. [The Standard – 5.3]		Environment Protection Act 1985 will be reviewed to ensure that Officers are correctly authorised.		1985 authorisations obtained from Department of Health New Officer authorisations issued. Updated legislative references added.
3.1.18 (iii) Ensure that all authorised officers receive the training needed to be competent to deliver their food law enforcement activities, in accordance with the Food Law Code of Practice. [The Standard – 5.4]	30/11/13	A matrix of Officer competency and authorisation levels will be devised and implemented to supplement the authorisation and training requirements.	Completed	An Officer competency matrix was produced and this was then linked to authorisations levels. This will support future performance and development discussions.
3.1.18 (iv) Maintain records of qualifications and training of each authorised officer in accordance with the Food Law Code of Practice. [The Standard – 5.5]	30/11/13	A new online performance development review programme will be implemented. This will include potential electronic storage of training certificates and qualifications.	Completed	Cheshire East Council corporate online performance assessments undertaken during October 2013 and records completed. All officers now hold copies of training certificates and course materials via Commercial Team electronic folder
3.2.8 Develop, maintain and implement procedures to ensure that the database is complete, accurate and up to date, and that accurate and comprehensive information on food law activity is reported to the Agency. [The Standard – 11.2 and 6.3]	31/10/13	The current procedures that demonstrate how Cheshire East registers new food businesses, and the procedure for dealing with non-registered food business, will be reviewed and where necessary developed and implemented to improve the accuracy of the food premises database.	Completed	<p>The existing registration procedure (FS8) was amended to outline how new registration requests will be processed.</p> <p>All existing recorded unrated premises were evaluated and where necessary contacted to improve the accuracy of the database.</p> <p>Officers have been reminded</p>

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<p>3.3.18(i) Ensure that food premises interventions and inspections are carried out at a frequency which is not less than that determined under the intervention rating scheme set out in the Food Law Code of Practice. Newly registered premises should be inspected within 28 days of registration in accordance with the requirements of the Code, having regard to the flexibilities for lower risk premises set out in the Food Law Practice Guidance. [The Standard - 7.1]</p>	31/03/14	<p>The advice given during the audit, regarding alternative enforcement strategies, and the Food Law Code of Practice requirements to undertake inspections within 28 days of registration, having regard to the flexibilities for the newly registered lower risk premises, will be investigated.</p> <p>The Authority will continue to maintain a risk-based intervention programme which will ensure that the resource available to the service is targeted appropriately. Currently this includes 100% inspection at all higher risk premises including non-broadly compliant risk rated C establishments. In addition, interventions will be carried out at a sample of lower risk premises to ensure that they are still appropriately risked. Newly registered premises will be bench top risk assessed and will be prioritised for visits at the potentially higher risk establishments.</p>	31/03/17	<p>regarding duplicate premises.</p> <p>The Authority is continuing to maintain a risk-based intervention programme which will ensure that the resource available to the service is targeted appropriately. It is projected by 31 March 2017 that all Category A-D premises will have been inspected.</p> <p>Newly registered premises will be bench top risk assessed and will be prioritised for visits at the potentially higher risk establishments</p> <p>An AES has been implemented for the Category E premises which are being prioritised according to the risk weighting.</p> <p>Unrated premises have been allocated to officers and are being contacted.</p>
3.3.18(i) Continued	31/03/14	Potentially lower risk establishments are currently subject to a self-assessment	Completed Management	The existing registration procedure (FS8) was amended to outline how new registration

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		questionnaire, if this identifies a high risk activity or the FBO fails to return the questionnaire, the premises will be prioritised for visit.	system in place to prioritise interventions.	requests will be processed Newly registered premises have been subjected to bench top risk assessment and have been prioritised for visits at the potentially higher risk establishments
3.3.18(ii) Assess the compliance of food premises to legally prescribed standards to confirm compliance with current legislation, the Food Law Code of Practice and centrally issued guidance. Take appropriate action, including follow-up action, on any non-compliances found in accordance with the Authority's enforcement policy. [The Standard - 7.3]	30/11/13	It was noticed that there was inconsistency regarding the quantity and quality of information recorded or provided on inspection reports, written warnings and notices. The existing procedures and Officer guidance will be reviewed and amended to ensure consistency. Officers will be advised on the new procedure. Consistency training regarding risk rating and documental evidence will be carried out both internally and as part of the Cheshire and Merseyside Technical Group.	Completed	The existing procedure regarding internal monitoring (FS11) was updated to include reference to Formal monitoring. An accompanied Inspection Report format was produced to ensure consistency when undertaking accompanied monitored inspections Lead Officers from Cheshire and Merseyside undertook the Food Standards Agency Consistency training course in February 2013 and this course was then cascaded to all Officers in March 2014.
3.3.18(iii) Maintain up to date, accurate and comprehensive records for all food establishments. [The Standard – 16.1]	30/11/13	The Approved Premises Inspection Aide-memoire will be revised to request more information from businesses regarding emergency withdrawal plans and recall procedures.	Completed	The Approved Premises Inspection Aide-memoire was revised to request more information from businesses regarding emergency withdrawal plans and recall

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		It was identified that some of the inspection records could be improved by supplying more details especially records of verification of the business food safety management systems and adherence to the cross-contamination guide.		procedures. Officers reminded to ensure sufficient details are recorded regarding verification of the business food safety management systems and adherence to the cross-contamination guide.
3.4.8(i) Review, maintain and implement the documented enforcement policy for food enforcement activities in accordance with the Food Law Code of Practice and other official guidance. [The Standard -15.1]	31/12/13	The corporate enforcement policy is under review, and whilst this is being undertaken by a different Department, the recommendations identified by this audit will be fed to the lead review officer.	Completed	The corporate enforcement policy has been updated and adopted. This has been supported by each enforcement department providing additional information on their specific enforcement options.
3.4.8(ii) Expand the documented formal enforcement procedures to provide additional guidance to officers on enforcement activities. [The Standard -15.2]	31/12/13	The Food Procedure, FS13 – Formal Action Procedure will be updated to include additional guidance regarding the withdrawal of Hygiene Improvement Notices and actions following the service of Notices. Officers will be trained on the new procedures.	Completed	The Food Procedure, FS13 – Formal Action Procedure has been updated to include additional guidance regarding the withdrawal of Hygiene Improvement Notices and actions following the service of Notices. Officers have been advised of the new procedures.
3.4.8(iii) Carry out food law enforcement in accordance with the Food Law Code of Practice and official guidance. [The Standard – 15.3]	31/12/13	Auditors identified a number of premises where follow-up action had not been taken in accordance with the Code of Practice.	Completed	The Commercial Team Leader and the senior Officer visited the premises identified by the audit and reviewed the follow up action. Officers have been

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		<p>The internal monitoring procedure, FS11 will be amended to provide the requirement for detailed information on situations when enforcement action is not taken in line with the Code of Practice.</p> <p>The monitoring of Service Requests and Complaints will also be added to FS11.</p>		<p>advised to record their reasoning as to why follow-up action had not been taken in accordance with the Code of Practice.</p> <p>The existing procedure regarding internal monitoring (FS11) was updated to include reference to the monitoring of Service Requests and Complaints</p>