

Updated Action Plan for London Borough of Ealing

Audit date: 10-13 December 2013

Action Plan updated: 23 April 2016

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.17 Ensure that a sufficient number of authorised officers are appointed to carry out the work set out in the Food Service Plan. The level of authorisation and duties of officers should be consistent with their qualifications, training and experience in accordance with the Food Law Code of Practice (FLCoP). [The Standard – 5.3]</p>	<p>30/6/2016</p>	<p>Of the 2145 interventions due for completion during 2016-2017 the Council will deliver 655 using directly employed food law enforcement officers and delivery of the remaining 1490 will be outsourced to an appropriate service provider following completion of the necessary procurement formalities.</p>	<p>Ongoing Completion by 30/9/2016</p>	<p>With effect September 2014 four additional full time equivalent (FTE) positions were created.</p> <p>With effect April 2015 1.0 FTE agency officer has been engaged.</p> <p>There are now a total of 10.5 permanently employed FTE authorised food law enforcement officers with 11.5 FTE authorised food law enforcement officers overall.</p> <p>The authority also has access to a pool of generic officers to undertake interventions and activities which are not classed as official controls.</p> <p>Furthermore the authority periodically enables officers to work on an overtime basis and outsources the delivery of</p>

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				<p>official controls to external agencies and contractors.</p> <p>Finally the authority has commissioned the delivery of 500 official controls at lower risk establishments to contracted EHPs through a reputable agency.</p>
<p>3.2.5(i) Set up maintain and implement a documented procedure to ensure that its food premises database is accurate, reliable and up to date. [The Standard – 11.2]</p>	<p>Completed</p>	<p>A documented procedure to ensure that the food premises database is accurate, reliable and up to date has been developed and will be implemented (as identified in the departmental work plan agreed by Committee in 2013). As the database is shared by various Council departments this procedure will need to be developed in consultation with them and the Council's IT partners.</p>	<p>Completed</p>	<p>A documented procedure to ensure that the food premises database is accurate, reliable and up to date has been developed and is being implemented.</p> <p>The results of monitoring activities has led to the procedure being supplemented by a number of practical work instructions to ensure the quality and consistency of data entered into the food premises database.</p>
<p>3.2.5(ii) Ensure that its electronic food premises database is managed and operated in such a way as to enable the uploading of accurate information to the Local Authority Enforcement Monitoring System (LAEMS). [The Standard – 6.3]</p>	<p>Completed</p>		<p>Completed</p>	<p>Modifications have been made to the database to ensure that AES and desktop interventions are not classed as official controls. The database has also been modified to ensure that enquiries are not classified as complaints.</p>

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<p>3.3.18(i) Carry out food hygiene interventions/inspections at a frequency which is not less than that determined by the Food Law Code of Practice. [The Standard – 7.1]</p>	<p>30/9/2016</p>	<p>It is anticipated that interventions/inspections will be carried out at the required frequency once a suitable service provider for delivery of interventions has been appointed as referred to in 3.1.17 following completion of the necessary procurement formalities.</p>	<p>Ongoing</p> <p>Completion by 30/9/2016</p>	<p>The authority has made significant progress in clearing the backlog of overdue A and B rated interventions and has significantly reduced the number of unrated establishments.</p> <p>100% of A and B rated and the majority of unrated establishments were subject to official controls in 2013-2014.</p> <p>The additional FTEs which have been appointed enable interventions at the highest risk establishments to be carried out at the required frequency.</p> <p>It will take some additional time to completely clear the backlog of overdue lower risk interventions. In the short term a project will be commissioned to complete approximately 500 inspections and in the medium term the serve hopes to secure central budget funds to commission a larger project to clear the remaining overdue lower risk inspections. It is now anticipated that this work will be completed by the end the 15/16 financial year.</p>

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3.3.18(ii) Ensure that inspections of general and approved establishments are carried out in accordance with the relevant legislation, the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.2]	Completed	Internal monitoring activities have identified some minor areas of non-compliance with relevant legislation, the Food Law Code of Practice and centrally issued guidance in relation to how inspections of general and approved establishments are carried out. It is anticipated that all residual issues will be corrected by the end of the current calendar year.	Completed	<p>Standard operating procedures have been formally authorised and implemented.</p> <p>Officers have been instructed to ensure that all contemporaneous notes generated from inspections and interventions are saved on the establishment files/records.</p> <p>Internal monitoring is conducted to ensure that inspections of general and approved establishments are carried out in accordance with the relevant legislation, the Food Law Code of Practice and centrally issued guidance.</p>
3.3.18(iii) Assess the compliance of establishments and systems including those in approved establishments to the legally prescribed standards and take appropriate and timely action on any non-compliance found in accordance with the Authority's enforcement policy. [The Standard – 7.3]	Completed	It is anticipated that the timeliness of follow-up action will improve once the additional FTEs referred to in 3.1.17 have been appointed. All approved premises will be subject to detailed review to ensure that these records are complete and consistent with the Framework Agreement. This project will be completed over the next year.	Completed	<p>The additional FTEs which have been appointed enable action following non-compliance to be taken in a timely manner.</p> <p>All approved establishment files have been reviewed and updated, several re-approvals of establishments have taken place.</p>
3.3.18(iv) Ensure that observations made and data obtained during interventions are stored in such a way that they are	Completed		Completed	Relevant contemporaneous notes are now being scanned and saved electronically on the

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retrievable. [The Standard – 7.5]				electronic database.
3.4.6 Carry out food law enforcement in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 15.3]	Completed		Completed	There is an on-going programme of internal monitoring to ensure compliance with this requirement of The Standard.
3.5.2 Expand on the current internal monitoring activities carried out to verify the conformance of the Service across the whole of the Standard in the Framework Agreement, the Food Law Code of Practice, relevant centrally issued guidance and the Authority's own documented policies and procedures. [The Standard – 19.2]	Completed	Internal monitoring activities will be further expanded during 2014/15 to verify the conformance of the Service across the whole of the Standard.	Completed	Internal monitoring activities have been expanded appropriately.
3.5.6 Ensure that timely investigations are made on receipt of food and food premises complaints in accordance with the Authority's own service standards and policies. [The Standard – 8.2]	Completed	It is anticipated that this situation will improve once the additional FTEs referred to in 3.1.17 have been appointed.	Completed	The additional FTEs which have been appointed enable timely investigations to be carried out.
3.5.11 Maintain up to date and accurate records in retrievable form on all food law enforcement activity in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 16.1]	Completed	Further modifications to the intervention checklists for general and approved establishments are planned in order to improve data capture in particular areas. Internal monitoring has identified some minor issues in relation to inspection record keeping. It is anticipated that all remaining issues will be fully addressed by	Completed	A work instruction has been issued requiring officers to scan all notes and save these electronically on to the relevant establishment or investigation file. This is monitored as part of the internal monitoring process.

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		the end of the current calendar year.		