

Updated Action Plan for Hertfordshire County Council

Audit date: 27-28 September 2011

Action Plan updated: 17 April 2013

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.4 Further develop the Service Delivery Plan in full accordance with the Service Planning Guidance in the Framework Agreement. The Plan should include a comparison of the resources required to deliver the feed law enforcement service against the resources available to the Authority, and a more detailed review of annual feed law enforcement activities, including any variation from the previous year's Plan and identified improvements. [The Standard - 3.1]</p>	<p>31/03/12</p>	<p>The Service Delivery Plan will be improved for 2012/13 to incorporate a more detailed annual review as well as a comparison of staff resources available against the resource allocated to deliver.</p> <p>Look at best practice within EETSA region.</p> <p>Improve knowledge/competency of existing staff to provide greater capacity and flexibility in relation to feed law enforcement.</p>	<p>Completed</p>	<p>Recruitment of a Senior TSO, with Feed experience – appointed 01/03/12. Undergone comprehensive feed training.</p> <p>A Feed Specialist Officer was appointed on a temporary basis to assist the delivery of feed related enforcement activities. Feed Hygiene Training and Imported Food/Feed Training was arranged and carried out in January 2012 for all relevant members of staff. Via EETSA Agriculture Group suggestion to work with authorities who have larger number of Feed premises to share their expertise.</p> <p>Two members of staff undertaking the agriculture module to provide greater flexibility for feed law enforcement. Specific Primary Production training to take place in July 2013 for three members of staff.</p> <p>Food and Feed Service Plan 2013/14 (draft) is currently being prepared with a comparison of feed resources needed against those available.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.7 Continue to develop, review and update documented policies and procedures relating to all feed enforcement activities at regular intervals and whenever there are changes to legislation or centrally issued guidance. [The Standard - 4.1]</p>	31/03/12	<p>Policies and procedures will be amended to incorporate Official Food and Feed (England) Regs 2009.</p>	Completed	<p>Policies and procedures manual has been reviewed and updated with the incorporation of relevant feed powers. Working on wording for incorporation of Official Food and Feed (England) Regulations 2009. Work instructions to follow.</p>
<p>3.1.14 Review the documented procedure for the authorisation of officers and the Council's scheme of delegation to ensure officers are appropriately and unambiguously authorised for all relevant feed law enforcement legislation in accordance with the Feed Law Enforcement Code of Practice and centrally issued guidance. [The Standard – 5.1]</p>	31/12/11	<p>The authorisation process is part of a Countywide process administered by County Council Legal Services.</p> <p>Legal Services to give a clear and unambiguous answer on the validity of the current authorisations.</p>	Completed	<p>FSA draft audit shared with Legal Services with request for clarification. Community Protection Manager has arranged for Official Food and Feed Controls Regulations and Feed Hygiene Regulations to now be included on Sub delegations.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.2.5(i) Carry out feeding stuffs inspections at a frequency which is not less than that determined under the relevant inspection rating system and in accordance with the legislation, Feed Law Enforcement Code of Practice or centrally issued guidance. [The Standard – 7.1 and 7.2]</p>	<p>31/03/12</p>	<p>Working in partnership with other agencies, including Rural Payment Agency and Assured Farm Scheme, develop an inspection plan that ensures that the department has improved awareness of the level of business compliance based upon risk.</p>	<p>Completed</p>	<p>First batch of Questionnaires have been sent, with the second batch ready to be sent. Consultation with database provider in order to make changes and improve database to make the best use of information stored on database and ensure that all recorded information is useful, comprehensive and accurate.</p> <p>Current list of High Risk premises visits continuing to be carried out annually, with additional visits to various types premises as part of EETSA Agricultural Group project work and FSA funded project work.</p> <p>AFS list of premises currently being checked and entered if appropriate onto database. Liaison and information sharing with other partners via EETSA Agriculture Group.</p> <p>Feed hygiene register of premises has been input onto the database under miscellaneous activities. Many premises have been updated and recoded due to visits and questionnaires, including information gathered by Animal Health Officers. This will continue with the aid of a newly developed questionnaire.</p>

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<p>3.2.5(ii) Assess the compliance of feed premises and systems to legally prescribed standards and ensure that observations made during inspections are recorded in a timely manner to prevent the loss of relevant information. Records should be legible and retrievable. [The Standard - 7.3 and 7.5]</p>	<p>31/12/11</p>	<p>Data recording procedures formalised as part of a wider departmental policy.</p> <p>Departmental paperwork amended to incorporate the Agency's recently issued template aide-memoire.</p>	<p>Completed</p>	<p>Staff informed by email of requirement to enter data within three working dates of visits taking place on 01/11/11. Reminder email by sent (16/07/12) in relation to the recording of information which is detailed and accurate.</p> <p>Contacted FSA as unable to locate via website, to have a copy of the new template provided. This was not forthcoming. Discussed with EETSA colleague and have obtained paperwork in use within EETSA, this will ensure consistency within the region.</p> <p>Agreed to extend use of FSA templates across all areas of feed visits to ensure the quality of the record of observations made on site by officers.</p>
<p>3.2.13 Extend the documented enforcement procedures to cover the full range of enforcement actions and follow up action for feed law enforcement in accordance with the relevant legislation, the relevant Code of Practice and centrally issued guidance. [The Standard – 15.2]</p>	<p>31/03/12</p>	<p>Extend the range of documented procedures, specifically in relation to Official Controls and General Food Regs.</p>	<p>Completed</p>	<p>Review of available actions being undertaken and develop where appropriate. This will be completed by 30/08/12.</p> <p>See 3.1.7 above for further actions.</p>

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<p>3.3.6 Ensure risk based internal monitoring covers all relevant areas of feed law enforcement activity in accordance with Article 8 of Regulation (EC) No. 882/2004 (Official Feed and Food Controls), the Feed Law Enforcement Code of Practice and centrally issued guidance. Internal monitoring should be recorded. [The Standard - 19.1 and 19.3]</p>	31/01/12	<p>Review of Qualitative and Quantitative monitoring to take place for incorporation in monitoring of effective delivery of 2012/13 Service Plan. This will include the reintroduction of accompanied audits.</p>	Completed	<p>A program of accompanied audits has been prepared by Lead Feed Officer for 2012/13. Two feed officers have had accompanied visits.</p> <p>Checks on data entry will be undertaken. This will be fed back to individuals concerned.</p> <p>Checks on visit records were undertaken and fed back to staff via e-mails and team meetings. Records are to be maintained.</p>
<p>3.3.9 Maintain adequate, up to date accurate records for all feed establishments in its area in accordance with the Feed Law Enforcement Code of Practice. Records should include reports of all interventions/inspections, the determination of compliance with legal standards, and details of any action taken, including those in relation to unsatisfactory samples and complaints. [The Standard – 16.1]</p>	31/01/12	<p>Improvement in the accuracy of data held.</p> <p>Current procedures will be amended to detail what data/information must be included in accordance with Feed law Enforcement Code of Practice.</p> <p>This will be monitored via internal monitoring process for compliance.</p>	Completed	<p>Detail of data required and the capability of trader database to record information has been examined and changes to the database and database entry has been completed with the database manager. This will include the data required for feed returns, so that the information can be more easily extrapolated</p> <p>The process of transferring AFS data onto HCC database is completed.</p> <p>The current Feed Hygiene Register has been transferred onto the database.</p> <p>Instructions have been sent out to staff reminding them of the importance of ensuring all actions are recorded and of completing data accurately (16/07/12).</p> <p>Data entry quality checks have been implemented and are ongoing.</p>