

## Updated Action Plan for the Council of the Isles of Scilly

**Audit date: 23-24 September 2013**

**Action Plan updated: 22<sup>nd</sup> March 2017**

Index	To address recommendation (including standard paragraph)	By (date)	Planned improvements	Progress	Action taken to date
1	<p>3.1.11 Set up liaison arrangements with neighbouring authorities and any other appropriate body, to facilitate efficient, effective and consistent enforcement in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 18.1]</p>	ongoing	<p>To set up a service level agreement (SLA) with another local authority or consultancy to facilitate efficient, effective and consistent enforcement in accordance with the Food Law Code of Practice and centrally issued guidance. This will encompass liaison arrangements with neighbouring local authorities and any other appropriate body, including representation at meeting of the regional liaison group. As</p>	Completed	<p>The EHO commenced employment on 2 February 2015 with responsibility to deliver a food safety service by the Isles of Scilly council.</p> <p>The EHO is a member of the Devon, Cornwall and the Isles of Scilly Food Liaison Food Group, and has attended meetings attended 11 March, 5 May, 8 September, 11 November 2015. Attendance at these meeting shall continue. The Council of the Isles of Scilly are committed to maintaining these links.</p> <p>Arrangements have been put in place with PHE Centre, Consultant in Communicable Disease Control (CCDC) with regard to procedures relating to ID notifications and dealing with imminent risks to public health.</p> <p>The SLA Cornwall Council to deliver Trading Standards (Food Standards) enforcement is ongoing and a revision of the SLA agreement is underway.</p> <p>A food sampling programme commenced in July 2015.</p> <p>The local authority have committed to purchasing the RIAMS package which has assisted them to develop their own policies and procedures. These are developing as the service requires.</p>

			<p>an interim measure prior to an SLA, the Council will engage a consultant(s) on an informal basis to ensure that there is sufficient continuity and cover to undertake environmental health services on the islands as and when required, including the provision of a food enforcement service, which will include provision for emergencies such as an imminent risk to public health, alleged food poisoning outbreak or food incident.</p>		<p>April 2016. SLA with Cornwall Council for 2016/17 has been determined. Public analyst appointed, Food Water Microbiology arrangements in place with Porton Laboratory. Food incident contingency in place as part of MoU with PHE and Teignbridge DC.</p>
2	<p>3.1.17(ii) Ensure that the officer appointed to have lead responsibility for food hygiene has the necessary specialist knowledge in relevant legislation. [The Standard – 5.2]</p>	ongoing	<p>To ensure that the officer appointed to have lead responsibility for food hygiene through the SLA has the necessary specialist knowledge in relevant legislation. Also ensure adequate cover on an informal basis as an interim measure until the SLA commences.</p>	Completed	<p>The EHO has undertaken refresher training in the areas of Food Control and has successfully completed a course in ‘HACCP Assessment for authorised officers’ in March 2015 which was run by Campden BRI.</p> <p>EHO attended a 2 day course in July 2015 on General Approved Establishment and Dairy Establishment training.</p> <p>A ‘Quality Monitoring of Inspection’ Exercise was carried out by colleague from Torridge Council in August 2015.</p> <p>The EHO is aware of the requirements and references to (EC)2073/2005 and under guidance from EHO in South West region and access to reference notes on courses titled :</p>

					<p>'Reducing the risks from E.Coli 0157 in small and medium sized food businesses'</p> <p>'Microbiological Criteria for food with an emphasis on Listeria Monocytogenes'</p> <p>Reference material 'Shelf life of ready to eat food in relation to L.monocytogenes – Guidance for food business operators'.</p> <p>EHO has completed a review of ' Microbiological Criteria for food with an emphasis on Listeria Monocytogenes' with a Lead EHO Mentor on 17 August 2016. (CPD 3hours)</p> <p>Going forward, the EHO will endeavour to attend future available courses within the SW region.</p>
3	<p>3.1.17(iii) Ensure that a sufficient number of authorised officers are appointed to carry out the work set out in the Food Service Delivery Plan including out of hours and emergency situations. The level of authorisation and duties of the officers should be consistent with their individual qualifications, training and experience and in accordance with the requirements of the Food Law Code of Practice. [The Standard – 5.3]</p>	ongoing	<p>To ensure that a sufficient number of authorised officers are appointed to carry out the work set out in the Food Service Delivery Plan through the SLA, including out of hours and emergency situations, and enforcement of the full range of formal food law enforcement options The level of authorisation and duties of the officers will be consistent with their individual qualifications, training and experience and in accordance with the requirements of the Food Law Code of</p>	Completed	<p>Due to the unique geographical location of the Isles of Scilly and the fact that there is one qualified resident EHO, the following arrangements are in place.</p> <p>The EHO is solely responsible for delivery of Food Safety Law Enforcement. Currently out of hours is also covered by the resident EHO.</p> <p>An agreement in principle has been reached with Teignbridge District Council Environmental Health who will provide the required help and support to deal with major incidents or outbreaks. This support would be delivered by officers selected at the time based on competency and availability.</p> <p>The level of authorisation of the EHO has been approved by full Council with a view to ensuring adequate cover for the Service given its unique geographical situation. Adequate support is available through documented procedures and external lead officers from the FLG should any situation arise to necessitate use of emergency enforcement powers prior to competency being developed.</p> <p>Officers Scheme of Delegation has been amended to show clear delegated authority from Senior Manager: Strategic Development to</p>

			Practice.	<p>Completed</p> <p>Complete by 31 October 2016</p> <p>Feb 2017</p>	<p>authorised Officers.</p> <p>Assessment of competence of Cornwall Council Officers to be carried out by Council of the Isles of Scilly.</p> <p>All approved food business premises have been inspected and the EHO shall continue to focus on food premises which have yet to be risk scored. In order to address the outstanding due interventions (C &amp; D), the Council have sourced external help in order to complete all outstanding due inspections by the end of October 2016 (excluding E premises).</p> <p>A work plan has been submitted to FSA which sets targets for inspections done by the end of June and October 2017. A target has been set for 100% of all A to E food establishments be inspected by the 31 October 2017. The Council will source external help as required.</p>
4	3.1.17(iv) Ensure that all authorised officers and support staff involved in food hygiene law enforcement activities receive the training needed to be competent to deliver the technical and administrative aspects of their duties, in accordance with the Food Law Code of Practice. [The Standard – 5.4]	ongoing	To ensure that all authorised officers and support staff involved in food hygiene law enforcement activities receive the training needed to be competent to deliver the technical and administrative aspects of their duties.	Completed	<p>The 'Uniform' database is operational and is supported by an officer from Teignbridge DC.</p> <p>The Assistant to the EHO has received training in the administration requirements in relation to Uniform.</p>

5	3.3.14(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]	ongoing	Continue to carry out food hygiene interventions/inspections at a frequency which is not less than that determined by the Food Law Code of Practice. Any deviations to the programme will be noted and recorded on the annual service plan.	June 2017  30 June 2017 31 Oct 2017	In order to address the outstanding due interventions, the Council have sourced external help in order to complete all outstanding due inspections by the end of October 2016 (excluding E premises). As of the end of October 2016, 11 food businesses two C and 9 D premises were still outstanding. 48 food businesses did receive Official Controls. This shortfall was due to the extreme difficulty in sourcing accommodation for external help during a very busy tourist season on the Isles of Scilly. A work plan has been submitted to FSA which sets targets for inspections done by the end of June and October 2017. A target has been set for 100% of all A to E food establishments be inspected by the 31 October 2017.
6	3.3.14(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]	ongoing	Continue 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.	Completed  Completed  Completed	Undertaken approval inspection in accordance with 853 and on product specific aide memoire.  Current 852 inspection activity has commenced using appropriate inspection forms and outcome information to FBO's.  Reviews of inspection activity have been made through shadowing and accompanied inspections with lead officers from FLG.
7	3.3.14(iii) Assess the compliance of establishments and systems to the legally prescribed standards and take appropriate and timely action on any non-compliance found in accordance with the	ongoing	Continue to assess the compliance of establishments and systems to the legally prescribed standards and take appropriate and timely action on any non-compliance found in accordance with the	Completed	Intervention activity has commenced against previously recognised high risk establishments.  Assessment of compliance has been undertaken using prescribed aide memoires  Records of inspection have been produced with clear guidance including legal requirements and recommendations.

	Authority's enforcement policy. [The Standard – 7.3]		Authority's enforcement policy following the development of the appropriate documented policy.		<p>Re-visits have been undertaken within the prescribed time limits to ensure compliance. EH enforcement policy was ratified at full council in June 2015.</p> <p>The EHO is aware of the requirements and references to (EC)2073/2005 and under guidance from EHO in South West region and access to reference notes on course titled : 'Microbiological Criteria for food with an emphasis on Listeria Monocytogenes'</p> <p>Reference material 'Shelf life of ready to eat food in relation to L.monocytogenes – Guidance for food business operators'.</p> <p>Going forward, the EHO will endeavour to attend future available courses within the SW region.</p>
8	3.5.5(ii) 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]	ongoing	To 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.	Completed	<p>Food Complaints procedure from RIAMS implemented.</p> <p>The procedures have been modified to match the operation of the EH department.</p> <p>Any TS complaints would be sent through to Cornwall TS as part of the SLA.</p>
9	3.5.10 Maintain up to date and accurate records in retrievable form on all food law enforcement activity in accordance with the Food Law Code of	ongoing	To 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	Completed	<p>The 'Uniform' database is currently operational.</p> <p>Developing folders for each FBO where inspection notes/information is scanned onto applicable folder.</p> <p>Approved establishments have been indexed in relation to Annex 10 of Code of Practice guidance.</p>

	Practice and centrally issued guidance. [The Standard – 16.1]		issued guidance.		Current system of recording of information meets the requirement with further database improvements expected in August.
10	3.1.7(i) Ensure that future Food Service Plans are drafted in full accordance with the Service Planning Guidance in the Framework Agreement. The Plan should include an accurate and clear comparison of the resources required to carry out the full range of statutory food law enforcement activities against a reasoned estimate of the resources available to the Service. The Plan should also clearly set out the proposed interventions programme for the year. [The Standard – 3.1]	Completed	To include an accurate and clear comparison of the resources required to carry out the full range of statutory food law enforcement activities against a reasoned estimate of the resources available to the Service. The Plan will also clearly set out the proposed interventions programme for the year. The food service plan will be taken to the General Purposes Committee meeting in February 2014 for endorsement.	Completed	Food Service Delivery Plan 2016/17 accepted at Full Council on 2 August 2016.
11	3.1.7(v) Maintain records of relevant qualifications, training and experience of each authorised officer and relevant support staff in	30/06/14	Maintain records of relevant qualifications, training and experience of each authorised officer and relevant support staff.	Completed	All officers and support staff will record training requirements and training completed.

	accordance with the Food Law Code of Practice. [The Standard – 5.5]				
12	3.2.7(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]	30/06/14	Set up a procedure to ensure that the food premises database is accurate, reliable and up to date and implemented this documented process.	Completed	The existing food premises database is being reviewed. Letter to all FBO's to advise of variances in businesses.  Documented procedure completed 21 June 2016.
13	3.2.7(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). This should include a robust means of verification of the accuracy and completeness of the returns by a senior officer before submission to the Agency. [The Standard – 6.3]	30/06/14	The LAEMS return will be verified in terms of accuracy and completeness by a senior officer before submission to the Agency. This will ensure that its electronic food premises database is managed and operated in such a way as to enable the uploading of accurate information.	Completed	The LAEMS return will be verified in terms of accuracy and completeness by the EHO prior to submission.  2014 return submitted - no issues  TS return has been queried and will be responsibility of TS under SLA to respond.  Update of database has ensured that LAEMS return has been submitted in 2016.
14	3.3.14(v) Ensure that observations made and	31/03/14	For the inspecting officer to rigorously document	Completed	New inspection activity confirms detailed and retrievable records are now being produced.

	data obtained during interventions are recorded in a timely manner and stored in such a way that they are retrievable. [The Standard – 7.5]		all observations made and data obtained during interventions and to ensure they are recorded in a timely manner and stored in such a way that they are retrievable in a prescribed format.		Ongoing intervention activity will be undertaken in prescribed manner.
15	3.4.4(i) Review the Food Safety Enforcement Policy in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 15.1]	31/10/14	Review the Food Safety Enforcement Policy in accordance with the Food Law Code of Practice and centrally issued guidance and take it to committee for approval.	Completed	EH policy approved by General Purpose Committee 2015
16	3.5.2(i) Set up, maintain and implement documented internal monitoring procedures in accordance with Article 8 of Regulation (EC) No. 882/2004, the Food Law Code of Practice and centrally issued guidance. [The Standard – 19.1]	30/06/14	To set up, maintain and implement documented internal monitoring procedures in accordance with Article 8 of Regulation (EC) No. 882/2004, the Food Law Code of Practice and centrally issued guidance.	Completed	Current inspection activity and forthcoming inspection activity will be monitored by lead officers of FLG.  Approved establishment was shadow inspected by current EHO. On-going refresher training in August and later in 2015 will amount to that internal monitoring. Annually it would be impossible for others to monitor enforcement work.  Quantity of inspections undertaken will be able to be monitored after August 2015.  Documented Internal Monitoring Procedure in place – June 2016.
17	3.5.2(ii) Verify the conformance of the Service with the	30/06/14	To verify the conformance of the Service with the	Completed	Documented Internal Monitoring Procedure in place – June 2016.

	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]		Standard in the Framework Agreement, the Food Law Code of practice, relevant centrally issued guidance and the Authority's own documented policies and procedures.		
18	3.5.8(i) Develop, maintain and implement a documented sampling policy and programme in accordance with any centrally issued guidance and the Food Law Code of Practice, including reference to any relevant national centrally co-ordinated sampling programme and taking into account the nature of food establishments in the area. [The Standard – 12.4]	30/06/14	To develop, maintain and implement a documented sampling policy and programme in accordance with any centrally issued guidance and the Food Law Code of Practice, including reference to any relevant national centrally co-ordinated sampling programme and taking into account the nature of food establishments in the area and the logistics of sending samples for testing.	Completed	<p>Development of the sampling procedure will be followed through RIAMS.</p> <p>A food sampling programme commenced in July 2015. Due to the problematic weather conditions and the reduced inter island and mainland travel routes during the late autumn and winter months the sampling program shall be active during the late spring, summer and early autumn months.</p> <p>Documented sampling policy in place for 2016/17.</p>
19	3.5.8(iii) Carry out sampling in accordance with its documented sampling policy, procedures and	30/06/14	To carry out sampling in accordance with its documented sampling policy, procedures and programme.	Completed	Documented sampling program in place for 2016/17.

	programme. [The Standard – 12.6]				
20	3.1.7(ii) Ensure that a performance review is carried out by the Authority and that any variance in meeting the Service Delivery Plan is clearly addressed in the subsequent year's Plan. [The Standard – 3.2 and 3.3]	28/02/15	A performance review will be carried out and any variance in meeting the Service Delivery Plan will be clearly addressed in the subsequent year's Plan. This will be carried out annually from February 2014.	June 2017	Monthly reports are issued to Service manager.  Environmental Health Service Plan 2016/17 has been submitted to Senior Leadership Team.
21	3.1.9 Ensure that following the development of all required documented policies and procedures for each of the enforcement activities covered by the Standard, that they are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance. [The Standard – 4.1]	31/12/14	Ensure that all developed documented policies and procedures are reviewed at regular intervals and that whenever there are changes to legislation or centrally issued guidance that they are reviewed accordingly.	Completed	RIAMS are being used to set up procedures for the food delivery service.  Localised variances are included within each procedure to reflect local operational methods  Work on-going to adapt and adopt RIAMS documents to ways of working  Policy /procedure reviews are all programmed to be carried out on their appropriate dates. Reviews shall take place during 2018.
22	3.1.17(i) Develop and implement a	30/06/14	Produce and implement a documented procedure	Ongoing	The new EHO will review and modify for additional officer appointments / grades as necessary.

	documented procedure for the authorisation of officers based on their competence and in accordance with the Food Law Code of Practice and any centrally issued guidance. [The Standard – 5.1]		for the authorisation of officers based on their competence and in accordance with the Food Law Code of Practice and any centrally issued guidance as part of a SLA. As an interim measure prior to an SLA, the Council will engage appropriately authorised consultants on an informal basis.		Lead Officer self-assessment competency requirements completed January 2017.  Competency assessments for Trading Standards Officers completed.
23	3.3.14(iv) Develop and implement documented procedures for the range of interventions and inspections carried out, including the inspection of general and approved establishments. The Standard – 7.4]	30/06/14	Ensure that all procedures carried out are documented for the range of interventions and inspections carried out, including the inspection of general and approved establishments.	Completed	The EHO has enabled a review of documented procedures and has developed where necessary procedures for the range of interventions and inspections carried out, including the inspection of general and approved establishments.  Ongoing work to develop RIAMS documents to be adopted to Isles of Scilly systems
24	3.4.4(ii) Set up, maintain and implement documented procedures for the full range of follow up and enforcement actions in accordance with the Food Law Code of Practice and centrally	30/06/14	To set up, maintain and implement documented procedures for the full range of follow up and enforcement actions in accordance with the Food Law Code of Practice and centrally issued guidance.	Completed  Completed	EHO has commenced procedures in order to ensure follow up of enforcement actions and these have been reflected in file checks. Enforcement policy has been devised and agreed by General Purpose Committee.  Enforcement procedures are fully documented.

	issued guidance. [The Standard – 15.2]				
25	3.5.2(iii) Ensure records of internal monitoring activities are maintained. [The Standard – 19.3]	30/06/14	Any internal monitoring that takes place must be documented.	Completed	Internal monitoring will be undertaken initially by EHO, external lead officers in relation to qualitative aspects of the service. A peer review of selected food files has been carried out and a 'Quality Monitoring of Inspection' Exercise was carried out by colleague from Torridge Council in August 2015.
26	3.5.5(i) Develop, maintain and implement a documented policy and procedure in relation to complaints received about food and food premises. [The Standard – 8.1]	30/06/14	To continue to act on any food and food premises related complaints that are received and to develop, maintain and implement a documented policy and procedure in relation to complaints received about food and food premises.	Completed	Documented procedure for the receipt of complaints has been completed.
27	3.5.8 (ii) Develop, maintain and implement documented procedures on the inspection of food, and for the procurement or purchase of samples, continuity of evidence and the prevention of deterioration or damage to samples whilst under its control in accordance with the Food Law Code	30/06/14	To develop, maintain and implement documented procedures on the inspection of food, and for the procurement or purchase of samples, continuity of evidence and the prevention of deterioration or damage to samples whilst under its control in accordance with the Food Law Code of Practice and centrally	Completed	Sampling programme in place in line with testing of sampling logistics in September 2015.  RIAMS systems are being used to develop and implement other procedures including inspection of food, continuity of samples taken.

	of Practice and centrally issued guidance. [The Standard – 12.3 and 12.5]		issued guidance taking into account the logistics of sending samples for testing.		
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