

Action Plan for Neath Port Talbot County Borough Council (Excluding Feed Service*)
Audit Date: 19th - 23rd May 2014

Status Key

Follow-Up Visit Date: 8th – 9th August 2016

	Completed
	Good Progress
	Limited Progress
	No Action Taken

(*) Actions arising from the audit in relation to animal feedingstuffs have not been included. A new regional feed delivery model was introduced in Wales from April 2015.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
3.27 (i) Ensure future Food and Feed Service Plans are developed in accordance with the Service Planning Guidance in the Framework Agreement. In particular, the costs of providing food and feed law enforcement services should be included, together with an estimate of the officer resource required to deliver the services against those available. [The Standard – 3.1]		The authority will fully address the matters identified in the next draft of the Service Plan.	The authority has updated its service delivery plan and gained approval from the relevant member.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
3.27 (ii) Carry out an annual food and feed law enforcement performance review for approval by the relevant member forum or senior officer, as appropriate. [The Standard – 3.2]		A comprehensive, documented annual performance review against the Service Delivery Plan and relevant Business Plans will be carried out for each service, and the review will be submitted to the relevant member for approval.	The authority had conducted a review of food law enforcement for the period 15/16 which requires some improvement.	Ensure the review reflects the performance required against the Food Law Code of Practice and ensure all parts reflect performance against targets set out in the previous Service Plan.
5.10 (i) Review, amend and implement its scheme of delegation and authorisation procedures to ensure officers are appropriately authorised following an assessment of their qualifications and competencies; and, Set-up, maintain and implement a documented procedure for the authorisation of food hygiene officers based on their competence in accordance with the Food Law Code of Practice and relevant centrally issued guidance. [The Standard – 5.1]		A review will be undertaken of the scheme of delegation to ensure that all relevant statutes are included in the list of legislation. A competency matrix will be introduced to ensure that all officer authorisations are based on an assessment of competency. A procedure for the authorisation of food hygiene officers will be developed and implemented.	The scheme of delegation has been amended. The authority has reviewed its procedure and implemented changes to include officer based competency and qualification assessments.	Completed. Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
5.10(ii) Review and where necessary amend officer authorisations to ensure the level of authorisation and duties of officers are consistent with their qualifications, training, experience and the Food Law Code of Practice. [The Standard – 5.3]		A review of authorisations will be undertaken to ensure that officers that require authorisation under FEPA are appropriately authorised by the FSA.	The authority has updated its officer authorisations in accordance with the recommendation.	Completed.
5.10 (iii) Ensure all authorised officers receive the training required to be competent to deliver the technical aspects of the work in which they will be involved, in accordance with the Codes of Practice. [The Standard - 5.4]			The authority has ensured that authorised officers receive the training required to deliver the technical aspects of their work.	Completed.
5.10 (iv) Maintain records of relevant academic or other qualifications, training and experience of each authorised officer in accordance with the relevant Codes of Practice. [The Standard – 5.5]		Communicate to officers in team meetings and during supervisions that records need to be appropriately maintained.	The authority records copies of its officers' academic or other qualifications on its shared electronic drive.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
7.18(i) Ensure that food establishment interventions/inspections are carried out at the minimum frequency specified by the Food Law Code of Practice. [The Standard – 7.1]		There are significant resource implications associated with the authority being able to carry out food hygiene interventions/inspections in accordance with the Food Law Code of Practice of all risk categories of food establishments. It has been necessary to target resources in recent years. However, a development programme is in place to increase the number of officers who are able to undertake food hygiene inspections.	Significant improvements have been made to the rate of interventions conducted at all risk categories, particularly at high risk establishments, and the authority is demonstrating a risk based approach to its intervention programme.	Ensure that establishments receive food hygiene interventions at the minimum frequency as specified by the Food Law Code of Practice.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
7.18(ii) Carry out interventions/ inspections in accordance with the Food Law Code of Practice and centrally issued guidance, and the authority's policies and procedures. [The Standard – 7.2]		Aim to ensure that interventions/inspections are undertaken in accordance with requirements, with the resources that have been made available. These requirements will be communicated via supervisions, appraisals and performance reviews, and routinely undertaking internal monitoring to verify compliance.	Improvements have been made in this area in relation to recording the reason for revising the risk ratings of an establishment (where applicable), red flagging and the process of approving establishments	Ensure that risk ratings are consistent with officer findings and actions.
7.18(iii) Assess the compliance of establishments in its area to the legally prescribed standards; and take appropriate action on any non-compliance found, in accordance with the authority's Enforcement Policy. [The Standard – 7.3]		These requirements will be communicated via supervisions, appraisals and performance reviews, and routinely undertaking internal monitoring to verify compliance.	Good progress has been made by the authority in assessing compliance with legal requirements in food establishments, particularly with regards to HACCP and cross contamination assessments.	Further work is required in relation to ensuring officer's document their assessment of compliance with regards to imported food.
7.18(iv) Fully implement its documented procedures in relation to inspections and revisits of food establishments. [The Standard -7.4]		Communicate the content of procedures to officers through team meetings, appraisals and performance reviews, and routinely undertake internal monitoring to verify compliance.	Inspections and revisits are being undertaken in accordance with the authority's procedure.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
7.18 (v) Ensure that observations made in the course of an inspection are recorded in a timely manner to prevent loss of relevant information. [The Standard – 7.5]		These requirements will be communicated via supervisions, appraisals and performance reviews, and routine internal monitoring will be undertaken to verify compliance.	Food Safety Officers are recording findings on the authority's aides-memoirs and on its electronic information management system.	Completed.
7.36 (i) Ensure that food standards establishment interventions and inspections are carried out at a frequency which is not less than that determined by the Food Law Enforcement Code of Practice. [The Standard – 7.1]		There are significant resource implications associated with the authority being able to carry out food standards interventions/inspections in accordance with the Code of Practice for all risk categories of food establishments. It has been necessary to target resources in recent years. Information on the authority's performance against meeting the requirements will be communicated to the relevant member, as part of the annual service performance review.	The authority has included those premises that were previously identified as outside of the scope of the programme into its programme of inspection.	Ensure food standards interventions, particularly medium, low risk and unrated establishments are conducted at the minimum frequency as specified by the Food Law Code of Practice.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
7.36 (ii) Carry out interventions/ inspections and risk assess establishments in accordance with relevant legislation, the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.2]		Aim to ensure that interventions/inspections are undertaken in accordance with requirements, with the resources that are available. Communicate the requirements to officers through supervisions, appraisals and performance reviews, and routinely undertake internal monitoring of interventions to verify compliance.	The authority has made some progress in completing this recommendation through the actions described. Improvements have been made in relation to accurately recording the nature of the intervention and the inspection status of individual establishments.	The authority must ensure: <ul style="list-style-type: none"> - that risk ratings reflect officers findings, - That appropriate follow up action is taken where significant issues are discovered, - that only eligible premises are included in any alternative enforcement strategy (AES), and where the AES involves information and data capture by an unqualified officer that this is reviewed by an appropriately qualified officer.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
7.36 (iii) Assess the compliance of establishments in its area to the legally prescribed standards; and ensure timely action is taken to follow-up non-compliance in accordance with the authority's Enforcement Policy. [The Standard – 7.3]		Communicate the requirements to officers at team meetings, supervisions, appraisals and performance reviews, and routinely undertake internal monitoring to verify compliance.	The authority has made some progress on this recommendation through the actions described. Improvements have been made in relation to the assessment of compliance with presentation and labelling requirements, compositional requirements, traceability requirements (including withdrawal / recall arrangements) and the existence and effectiveness of Quality Management Systems.	The authority must ensure that officers document the scope of their interventions at establishments and their assessment of compliance in line with the authority's procedure and the Food Law Code of Practice.
7.36 (iv) Ensure the documented food standards interventions procedures reflect the requirements of the Food Law Code of Practice and Practice Guidance. [The Standard – 7.4]		Review and amend, as appropriate the intervention procedures and communicate to relevant officers for implementation. Routinely undertake internal monitoring to verify compliance.	The authority has reviewed and amended it procedure to ensure that it accords with the requirements of the Food Law Code of Practice.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
7.36 (v) Ensure that observations and/or data made in the course of an intervention/inspection are recorded in a timely manner to prevent the loss of relevant information, and that all records of interventions are stored in such a way that they are retrievable. [The Standard – 7.5]		Communicate the requirement for officers to make appropriately detailed records of observations made during inspections through team meetings, appraisals and performance reviews, and routinely undertake internal monitoring to verify compliance.	Officers are directed to record their observations on aides-memoir developed by the authority and on its electronic information management system (IMS). Some evidence was provided to indicate that officers are documenting their findings in this way.	The authority must ensure that officers consistently record their inspection observations and findings in a timely and retrievable manner.
8.13 (i) Set up, maintain and implement a documented policy and procedures in relation to complaints about food and feed establishments; and, amend the food standards and feed complaints procedures to include details of its approach to complaints relating to food and feed originating from other EU member states or third countries. [The Standard – 8.1]		Set-up a policy and procedure in relation to complaints about food establishments and amend food standards procedure to include information on dealing with complaints relating to food arising from other EU member states or third countries. Communicate at team meetings the content of policy and procedure to relevant officers for implementation. Routinely undertake internal monitoring to verify compliance.	The authority had introduced a joint food hygiene and food standards procedure for the investigation of food and food premises complaints which included complaints relating to food establishments and food originating from other EU member states or third countries.	The authority must ensure that its Food/Feed Stuffs/Food Premises Complaints Procedure is fully implemented in relation to food hygiene complaints. With respect to Food Hygiene complaint investigations, officers should document their investigation findings using the forms laid out in the procedure.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
<p>8.13 (ii) Ensure the outcome of food hygiene and food standards complaint investigations is communicated to complainants, and that the target response times for food hygiene, standards and feed complaints are met, in accordance with its procedures. Notify all food standards complaints identified as serious localised, or non-localised food hazards to the FSA in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standards 8.2]</p>		<p>Communicate the requirements of the Codes of Practice, official guidance and the authority's procedures to relevant officers, and routinely undertake internal monitoring to verify compliance.</p>	<p>The investigation of food standards and food hygiene complaints are being conducted in line with the authority's response times and the outcome of investigations was being communicated to complainants in a timely manner.</p>	<p>Completed.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
12.10 (i) Review, update and implement its documented Food Sampling Policy in accordance with centrally issued or relevant guidance and the Food Law Code of Practice; and ensure that the Food Sampling Policy and Food Standards and Feed Sampling Policy Procedure include reference to its approach to national sampling priorities. [The Standard – 12.4]		The authority's food and feed sampling policies will be reviewed and amended to ensure that they accord with the relevant requirements.	The authority has amended and implemented its food sampling policy.	Completed.
12.10 (ii) Amend the Food Standards and Feed Sampling Policy Procedure to include information on the methodologies for sampling products in different states, and a list of equipment required for taking samples, in accordance with the Food Law Code of Practice and relevant centrally issued guidance. [The Standard – 12.5]		Review the Food Standards and Feed Sampling Policy Procedure and amended, as appropriate. Communicate any amendments to relevant officers for implementation and undertake routine internal monitoring to verify compliance.	The authority has amended and implemented its food standards sampling procedures to reflect this recommendation.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
12.10 (iii) Carry out food and feed sampling in accordance with its procedures. [The Standard – 12.6]		Communicate the content of procedures to relevant officers at team meetings, appraisals and performance reviews, and routinely undertake internal monitoring to verify compliance.	The amended procedure has been implemented.	Completed.
12.10 (iv) Take appropriate action in accordance with its Enforcement Policy where microbiological sample results are not considered to be satisfactory. [The Standard – 12.7]		The requirements will be communicated via supervisions, appraisals and performance reviews, and routine internal monitoring will be undertaken to verify compliance.	Recommendation completed in relation to microbiological samples.	Completed.
13.8 (i) Ensure that the procedure for investigation of infectious diseases is implemented in all cases. [The Standard – 13.2]		The requirements will be communicated via supervisions, appraisals and performance reviews, and routine internal monitoring will be undertaken to verify compliance.	The amended procedure has been implemented.	Completed.
14.7 (i) Notify the FSA of any serious localised incidents or wider food safety problems in accordance with the Food Law Code of Practice. [The Standard – 14.5]	OPEN.	The requirements will be communicated via supervisions, appraisals and performance reviews, and routine internal monitoring will be undertaken to verify compliance.	<i>Untested – no occasions where incidents required reporting were audited during the follow up of the authority.</i>	

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
15.19 (i) Amend its Enforcement Policy to include Primary Authority considerations and the criteria for use of all available food and feed enforcement options in accordance with the relevant Codes of Practice and official guidance, and ensure the policy is implemented. [The Standard – 15.1]		Review the Enforcement Policy and amend, as appropriate. Communicate revised policy to officers for implementation and undertake routine internal monitoring to verify compliance.	The authority has made the required changes to its Enforcement Policy.	Completed.
15.9 (iii) Ensure that food hygiene enforcement is carried out in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 15.3]		Communicate the requirements of the Food Law Code of Practice, centrally issued guidance and the authority's procedures to officers, and routinely undertake internal monitoring to verify compliance.	Good progress against this recommendation has been made.	Ensure that compliance with RANs is checked in a timely manner.
15.9 (iv) Document the reasons for any departure from the criteria set-out in the Enforcement Policy. [The Standard – 15.4]		Communicate the need to document reasons via team meetings, supervisions, appraisals and performance reviews and routinely undertake internal monitoring to verify compliance.	Auditors were unable to find evidence that officers had deviated from the authority's enforcement policy.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
<p>16.9 (i) Maintain up to date accurate records of all food establishments in its area, in accordance with the Food Law Code of Practice and centrally issued guidance. These records shall include reports of all interventions/ inspections, the determination of compliance with legal requirements made by the authorised officer, details of action taken where non-compliance was identified and details of any enforcement action taken. The authority should also record, with reasons, deviation from set procedures. [The Standard – 16.1]</p>		<p>Remind officers responsible for delivering food standards interventions of the requirement at team meetings, appraisals, supervisions and performance reviews, and routinely undertake internal monitoring to verify compliance.</p>	<p>The Food Inspection / Intervention Procedure issued to Trading Standards officers requires Standards officers to complete and leave a post inspection report at the end of the intervention / inspection and for matters to be confirmed in writing using the authority's standards template within two weeks of the inspection.</p>	<p>Ensure that inspection reports and letters are communicated to Food Business Operators post inspection and ensure that food standards reports contain all necessary information as specified in the Food Law Code of Practice including name of person seen, the food law under which interventions were undertaken, designation of inspecting officer and timescales for compliance. Ensure all relevant establishment information is retained on establishment files; including notebook observations.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING ACTIONS
19.12(i) Fully implement the revised internal monitoring procedure for food hygiene, food standards and feed. [The Standard – 19.1]		Procedure to be implemented by relevant officers and PO EHTS to carry out routine checks to confirm monitoring activities undertaken as required.	The authority has fully implemented its procedure with regards to Food Hygiene. With respect to food standards; some internal monitoring has occurred and the authority has made a commitment to implement a revised procedure.	The authority must ensure food standards accompanied visits are conducted in accordance with its procedure and the full detail of the food standards establishment file checks carried out must be demonstrated in the records maintained.

Summary.

Total Recommendations	29
Completed	16
Good Progress	9
Limited Progress	3
No action	0
Untested	1
Total Outstanding	14