

Updated Action Plan for Norfolk County Council

Audit date: 11-12 October 2011

Action Plan updated: 26 February 2013 and 8 May 2014

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.6 Further develop the Service Plan for Food and Feed Law Enforcement, in accordance with the Service Planning Guidance in the Framework Agreement, to include a comparison of the resources required to carry out the full range of statutory feed law enforcement activities against the resources available to the Authority, based on the full range of demands placed upon it including the national enforcement priorities. [The Standard – 3.1]</p>	<p>09/02/12</p>	<p>(1) Include a comparison of the resources required to carry out the full range of statutory feed law enforcement activities against the resources available to the Authority in the Food and Feed Law Enforcement Plan for 2012/13.</p>	<p>Completed</p>	<p>(1) Comparison included in Section 4.1 of the Food and Feed Law Enforcement Plan (FFLEP) for 2012/13.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Report to Cabinet of 02/04/12 • FFLEP 2012/13 • Minutes of Cabinet meeting of 02/04/12 • Cabinet Recommendations to Council meeting of 08/05/12 • Minutes of Council meeting of 08/05/12

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.12 Ensure that all officers only carry out those duties consistent with their qualifications and level of authorisation. [The Standard – 5.3]</p>	<p>31/01/12</p>	<p>(2) An officer undergoing training had carried out formal sampling and had served a statutory notice, under the supervision of an authorised officer for competency demonstration purposes.</p> <p>Remind all staff within Trading Standards that, during training, any official documentation will be signed by the authorised officer and countersigned by the trainee (to meet competency demonstration requirements).</p>	<p>Completed</p>	<p>(2) Farming Team members were reminded at their November team meeting and this reminder was reiterated via email on 21/02/12.</p> <p>All Trading Standards Team Managers (TSTMs) were reminded as per minutes of TSTM meeting of 13/12/11, and subsequently reminded their team members in their team meetings/via email.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Notes of TSTMs meeting of 11/12/11 • Email re Metrology Services Team meeting notes of 06/01/12 • Email to Inspection and Compliance (IAC) Team members dated 09/01/12 • Email to Farming Team members dated 21/02/12 • IAC Team meeting notes of 27/03/12

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<p>3.1.17 Develop, maintain and implement a documented procedure to ensure that the database is complete and up to date and that accurate information of feed law enforcement activity is reported in official returns to the Agency. Monitoring of the database and records of these checks should also be included.</p> <p>[The Standard – 6.3, 11.2, 19.1 and 19.3]</p>	01/04/12	<p>(3) Document and implement the procedure for maintaining and ensuring the currency and accuracy of our business premises database. Monitor its accuracy to ensure that all feed businesses are included in the authority’s register of feed businesses. Ensure that the enforcement activities relating to these businesses are recorded accurately and that the information is reported to the FSA.</p>	Completed	<p>(3) Draft guidance introduced to guide officers on updating business premises database. Note: This will be converted into a work instruction when it has been fully “road tested” to ensure it addresses all issues.</p> <p>The guidance includes both reactive and proactive updating and includes information from other enforcement agencies/ industry bodies, such as AHVLA, VMD, AIC and AFS.</p> <p>Guidance provided to Environmental Health via the Norfolk Food Liaison Group to notify the Service when they find food businesses supplying waste food or co-products into the feed chain. This information is held on the database and is available on request. [This information has been shared with AHVLA as part of their upcoming FVO audit].</p> <p>Evidence:</p> <ul style="list-style-type: none"> • database updating guidance • Briefing to Norfolk Food Liaison Group

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	01/03/12	(4) Ensure officers record all instances where they have issued a written warning.	Completed	<p>(4) All officers have received refresher training during the period 20/01/12 to 30/04/12 on how to conduct inspections (including food and feed inspections) and record them on revamped enforcement visit sheets. Guidance notes specifically cover the definition and recording of written warnings.</p> <p>Farming Team officers were trained on 21/02/12 and reminded at April team meeting of the need to ensure written instructions stipulating what is required by when are issued to FeBOs when improvements are required.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Parts 1, 2 and 3 of the Enforcement Visit Sheets • Enforcement Visit Sheets – Guidance • Farming Team meeting notes of Dec 11 • Farming Team meeting notes of April 12 • Farming Team specific guidance

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<p>3.2.9 (i) Ensure that feeding stuffs premises inspections are carried out at a frequency which is not less than that determined under the relevant inspection rating scheme, giving priority to higher risk establishments and in accordance with the legislation, Feed Law Enforcement Code of Practice and centrally issued guidance. [The Standard – 7.1]</p>	<p>09/02/12</p>	<p>(5) Explain in more detail our inspection programme in our Food & Feed Law Enforcement Plan. Review policy/procedures on unannounced visits with reference to guidance set out in the 2011/12 national enforcement priorities.</p>	<p>Completed</p>	<p>(5) All high risk feed businesses are inspected on an annual basis so no action required to amend the frequency of inspections at high risk businesses. Explanation included in Section 3.1 of the Food and Feed Law Enforcement Plan 2012/13</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Report to Cabinet of 02/04/12 • FFLEP 2012/13 • Minutes of Cabinet meeting of 02/04/12 • Cabinet Recommendations to Council meeting of 08/05/12 • Minutes of Council meeting of 08/05/12 <p>After further consultation with the FSA and agreement on the wording the unannounced visits policy has been reviewed and consulted on regionally. The policy has now been adopted by the Authority and is to be addressed in the 2015/16 Service Plan.</p>

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	01/04/12	(6) Review our intelligence and risk-led projects and premises database such that premises where higher risk activities are believed to be taking place are taken into consideration in our annual inspection programme; where appropriate, taking account of the national enforcement priorities and ensuring that all feed sectors are considered.	Completed	<p>(6) Farmed animal feed manufacturers (R1-4) are inspected on an annual basis. As part of the inspections, those materials that are highlighted in the FSA feed enforcement priorities document are sampled.</p> <p>During 2011/12 and 2012/13, FSA funded audit work has been/is being targeted at R10 mixers and R08 transporters. Further work in this area will be determined by the risk scores for these feed sectors.</p> <p>R11 and R13 feed businesses are inspected as part of the medium risk inspection programme and R12s are now inspected as part of the annual high-risk food businesses inspection programme.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • High-risk inspection programme • Medium risk inspection programme (data available on request)

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<p>3.2.9 (ii) Carry out interventions/inspections and register feed establishments in accordance with relevant legislation, the Feed Law Enforcement Code of Practice and centrally issued guidance. [The Standard – 7.2]</p>	<p>01/04/12</p>	<p>[See (3) above for planned improvements for registration of feed establishments.]</p> <p>[See (5) above for planned improvements to our approach to unannounced inspections.]</p> <p>(7) Strengthen our records of feed inspections, including the information provided for businesses on visit reports.</p>	<p>Completed</p>	<p>(7) All officers have received refresher training during the period 20/01/12 to 30/04/12 on how to conduct inspections (including food and feed inspections) and record them on revamped enforcement visit sheets. Guidance notes specifically cover the definition and recording of written warnings.</p> <p>Farming Team officers were trained on 21/02/12 and reminded at April team meeting of the need to ensure written instructions stipulating what is required by when are issued to FeBOs when improvements are required.</p> <p>Principal TSO monitoring of the quality of reporting has shown a marked increase in the accuracy of information in relation to feed registrations and recording. Monitoring to continue on a monthly basis</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Parts 1, 2 and 3 of the Enforcement Visit Sheets • Enforcement Visit Sheets – Guidance

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		(7) Strengthen our records of feed inspections, including the information provided for businesses on visit reports continued		Evidence continued: <ul style="list-style-type: none"> • Farming Team meeting notes of Dec 11 (Ref 15) • Farming Team meeting notes of April 12 (Ref 16) • Farming Team specific guidance • Crib sheets for Annex 1 and 3 inspections • Livestock Premises Inspection Guide and Record
3.3.5 Maintain up to date, accurate and comprehensive records in retrievable form for all feed establishments and relevant checks in accordance with the Feed Law Enforcement Code of Practice, including all records of inspections and determinations of compliance carried out by authorised officers and monitoring records. [The Standard – 16.1 and 19.3]	01/03/12	[See (7) above for planned improvements in relation to records.] (8) Provide training for officers who undertake food inspections/interventions on identifying/taking enforcement action at those food business operators who are also feed business operators.	Completed	(8) IAC Team was trained on 29.05.12. Evidence: <ul style="list-style-type: none"> • IAC Team meeting notes of May 12 • Presentation: Waste food from high risk and other food premises • Feed Hygiene HACCP Plan Template • Feed Hygiene HACCP Plan guidance notes