

Updated Action Plan for Northamptonshire County Council

Audit date: 23-24 August 2011

Action Plan updated: 23 November 2012

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 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>31/03/13</p>	<p>A pre-requisite of this is to update and improve the database, and obtain more clarity on the activities of feed premises registered and unregistered and a risk re-assessment also needs to be carried out. An estimate will be obtained in the next month and reviewed at the close of the financial year and as further work is done.</p>	<p>Ongoing</p>	<p>Generally the Service Plan is now in line with Service Planning Guidance.</p> <p>A number of visits have been made and assessments are being compared with colleagues and FSA estimates. Liaison with the Rural Payments Agency may assist verifying and updating information. Once this is achieved a more accurate assessment of required resources will be possible.</p>

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3.1.7 Ensure that documented policies and procedures relating to all feed enforcement activities are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance. [The Standard - 4.1]	30/09/12	The authority plans to update and revise policy and procedures to align with current legislation. It is anticipated that this will be completed over the next 12 months.	Ongoing	<p>The Quality Assurance has been under review, introducing flowcharting of activities and moving to electronic record retention and retrieval system.</p> <p>The QA procedures have been revised and expanded to cover all of feed hygiene and standards and are in draft form, and being finalised.</p>
3.1.15(i) Develop, maintain and implement a documented procedure for the authorisation of officers and ensure that the level of authorisation is linked to the level of qualifications and competence required by the Feed Law Enforcement Code of Practice and centrally issued guidance. [The Standard – 5.1]	30/04/12	The authority will develop a more detailed authorisation procedure to ensure that officers clearly understand the constraints on them regarding powers of enforcement and do not act outside their levels of competence.	Ongoing	The Service recognises the need to ensure staff understand the scope of their enforcement activities without constraining effective and efficient enforcement by the Service. A draft Authorisation Procedure has been developed and is awaiting implementation. The procedure will be linked to the Scheme of Delegation and competency.
3.1.15(ii) Review the resources allocated to feed law enforcement and ensure that a sufficient number of appropriately authorised officers are appointed to carry out work set out in the feed service delivery plan. [The Standard - 5.3]	30/09/12	A pre-requisite of this is to update and improve the database, and obtain more clarity on the activities of feed premises registered and unregistered and a risk re-assessment also needs to be carried out. An estimate will be obtained in the next month and reviewed at the close of the financial year and as further work	Ongoing	<p>The initial estimates have yet to be developed into more detailed assessments. This will become more accurate once the database has been effectively populated.</p> <p>Next Service Plan will incorporate an assessment of resources needed to achieve compliance with the Code's frequency of inspection,</p>

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		is done.		<p>and detail the resources to be made available for the coming year. Direct funding support from the Food Standards Agency was appreciated this year and would help Service Planning if this could be guaranteed over the long term to provide certainty.</p> <p>The outcome of the FSA's Review Of Official Animal Feed Controls in 2013 will guide how developed this aspect will need to be. The outcome is awaited, anticipated April 2013.</p>
<p>3.1.19 Set up, maintain and implement documented procedures to ensure that the feed premises database is accurate, reliable and up to date. [The Standard - 11.2]</p>	30/09/12	<p>The authority plans to update and revise policy and procedures to align with current legislation. It is anticipated that this will be completed over the next 12 months. Updating premises will be a longer term process and form part of the ongoing work programme for 2012/13 and subsequent years.</p>	Ongoing	<p>Documented procedure in draft will be finalised on completion of upgrades to the database system.</p> <p>Work is being done to improve the accuracy of FeBO records on the Flare database. The paper records are being saved as electronic records and Flare has been re-configured to accurately record registration categories. Further work will be done to update accuracy and set appropriate risk assessments.</p> <p>Database entry procedures are being incorporated into the other feed procedures which are in draft</p>

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				<p>form. Internal monitoring procedures to ensure database remains accurate will be documented.</p> <p>Staff training is in progress.</p> <p>The outcome of the FSA's Review Of Official Animal Feed Controls in 2013 will guide how developed this procedure will need to be. The outcome is awaited, anticipated April 2013.</p>
<p>3.2.6(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>The Food and Feed Service Plan 2012/13 will set out targets for inspections based around risk. The database will be updated and registrations will be reassessed for risk.</p>	<p>Ongoing</p>	<p>A database with improved accuracy is a pre-requisite to basing inspections on allocated risk. However high risk feed mills, and processors and handlers of waste food destined for the feed chain have been given priority within the feed enforcement workload.</p> <p>FSA grant money has been utilised and a contractor employed to carry out this high priority work. Manufacturers, processors, waste and co-product suppliers and on-farm mixers have been effectively targeted.</p> <p>Continuing resource constraints continues to be an issue in fully implementing this recommendation.</p>

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				<p>The Service continues to work towards implementing an inspection programme that more closely reflects the frequency in the Code of Practice, having regard to resources available and competing commitments.</p> <p>The outcome of the FSA's Review Of Official Animal Feed Controls in 2013 will guide how this develops. The outcome is awaited, anticipated April 2013.</p>
<p>3.2.6(ii) Develop, maintain and implement a documented inspection procedures for the range of inspections carried out. [The Standard – 7.4]</p>	<p>31/03/12</p>	<p>The authority will carry out wholesale revision and update procedures taking account of existing good practice.</p>	<p>Ongoing</p>	<p>Inspection procedures are currently based on FSA-designed inspection records thereby ensuring following good practice.</p> <p>Registration and intervention procedures have now been developed and drafted. Although officers are following the procedures some further development is required before full implementation.</p> <p>The outcome of the FSA's Review Of Official Animal Feed Controls in 2013 will guide how developed this procedure will need to be. The outcome is awaited, anticipated April 2013.</p>

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<p>3.2.6(iii) 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>	31/03/13	<p>The revision of the documentation and database will enable compliance assessment to be carried out on the basis of risk. The work will be commenced this financial year and completed over the following year as inspections are carried out.</p>	Ongoing	<p>The above inspection records are the basis of the compliance assessment. Officers received 6 hours training specifically on feed on farms and mills and completed an exam to demonstrate HACCP understanding and competence.</p> <p>Officers are now using the FSA template aide memoir to help prompt their onsite visits and record detailed observations. Officer's records are to be monitored to ensure a suitable level of record keeping is maintained.</p>
<p>3.2.12 Set up, maintain and implement documented procedures for the procurement of feed samples in accordance with the Feed Law Enforcement Code of Practice and centrally issued guidance. [The Standard - 12.5]</p>	31/03/12	<p>Feed sampling procedures will be reviewed and amended as required.</p>	Ongoing	<p>Sampling procedures have been updated and will be cross-checked by colleagues with up to date competence in the area.</p> <p>Draft procedures to be further developed to ensure continuity of evidence for samples and sample documentation is maintained.</p>

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<p>3.2.15 Set up, maintain and implement documented enforcement procedures for the range of enforcement actions and follow up action for feed law enforcement in accordance with the relevant legislation, the Feed Law Enforcement Code of Practice and centrally issued guidance. [The Standard – 15.2]</p>		<p>The Feed Law Enforcement Code of Practice already sets out much of this. Reference will be made to the code in the Enforcement procedures. See below.</p>	<p>Ongoing</p>	<p>The Code of practice will be referred to in the inspection and enforcement procedure. An Improvement Notice has been issued in respect of Feed Hygiene.</p> <p>Enforcement procedures referencing the FLECP have been developed within the Registration, etc. draft procedure. These will be further developed to cover the full range of enforcement options.</p>
<p>3.2.19 Set up, maintain and implement a documented procedure for initiating and responding to feed alerts in accordance with the Feed Law Enforcement Code of Practice. [The Standard - 14.1]</p>	<p>01/10/11</p>	<p>The monitoring and response to Alerts from the Food Standards Agency Incidents Branch has been in operation from its inception, and updated as circumstances alter. This will continue. The enforcement procedure will be revised to ensure officers refer to the dedicated email inbox from the Agency.</p>	<p>Ongoing</p>	<p>The procedure will be updated to refer to the Feed Code of Practice in the event of an incident.</p> <p>Feed Incidents and Hazard procedures referencing the FLECP have been developed within the Registration, etc. draft procedure.</p>
<p>3.3.6 Set up, maintain and implement documented internal monitoring procedures 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 and records retained for two years. [The Standard - 19.1 and 19.3]</p>	<p>01/10/11</p>	<p>Internal monitoring is active and operating as an integral part of the management of the Service. This will continue. Records of review work are made on relevant documentation such as visits, complaints or samples on the database which records the activities of the Service. The records are retained for at least six</p>	<p>Ongoing</p>	<p>Internal monitoring of work continues to take place through regular oversight of work and officers workload review with their manager by way of 1 to 1 meetings and team meetings.</p> <p>These activities will be included in the procedure, formalising this ongoing process and internal</p>

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	31/03/12	years. Consideration will be given to reviewing the food and feed enforcement procedure which records these aspects relevant to 3.2.15, 3.2.19, 3.3.6 to ensure clarity.		monitoring will be implemented on a risk basis.
3.3.9 Maintain 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. [The Standard – 16.1]	31/10/11	The database currently in operation is able to record all actions and activities. The issues of up to date accurate records is addressed in 3.1.19 above.	Ongoing	Inspection records include the retention of the inspection form as designed by the FSA and correspondence with the FeBO. The database records all such interventions and actions. Records for the highest risk premises are being maintained effectively. Once the database has been completely populated records will be more comprehensive.