

Updated Action Plan for Northumberland County Council

Audit date: 17- 18 October 2012

Action Plan updated: 6 March 2014

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.1.6(i) Ensure that future Food Service Plans are in full accordance with the Service Planning Guidance in the Framework Agreement and include details of all demands on the Service including the annual food premises intervention programme and any backlog including unrated establishments. In addition provide an accurate and reasoned estimate of the staffing resources required to deliver the food law enforcement service compared with the staffing resources available to the Authority. [The Standard – 3.1]	30/06/13	The Food Service Plan 2012/13 will be superseded by a Plan for 2013/14. The content of this plan will be dependent on the results of the work underway to resolve the food premises records currently classed as 'unrated'. Once this service demand has been identified priorities and resources can be assessed for this service. The plan will be in full compliance with the requirements of the Standard.	Completed	Food and Feed Safety and Standards Service Plan 2013/14 presented and endorsed by Council Policy Board 08/10/13.
3.1.6(ii) Any variance in meeting the Plan should be addressed in the following year's Plan. [The Standard - 3.3]	30/06/13	The position of the Service will be reviewed at the end of this financial year and priorities and resources will be assessed accordingly for the Food Service Plan 2013/14.	Completed	As 3.1.6(i) above
3.1.6(iii) Ensure that the Service has a sufficient number of suitably qualified, experienced and competent officers to carry out the work set out in the Food Service Plan. [The Standard – 5.3]	30/06/13	Staffing resources will be included in the review of the Service and preparation of the Food Service Plan 2013/14.	Completed	Short term staffing shortfall covered by external consultants for current Service Plan.

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<p>3.1.13(i) Review and update its authorisation procedure to include a suitable method of assessing and reviewing officer competencies and associated training requirements commensurate with their responsibilities and duties. In addition current officer authorisations should be reviewed as necessary to ensure that all officers are appropriately authorised under relevant current legislation in accordance with their individual level of qualification, experience and competency. [The Standard – 5.1 and 5.3]</p>	31/03/13	<p>A revised authorisation procedure will be developed, which is more specific to the individual officer's qualifications, experience and currency.</p> <p>A further review of officer authorisations will be undertaken upon completion and implementation of the revised authorisation procedure.</p>	Completed	<p>New procedure developed and implemented from 31/01/13</p> <p>Requirement in procedure to review authorisations annually at Appraisal from April 2013.</p>
<p>3.1.13(ii) Ensure that all relevant officers have the necessary specialist knowledge in relation to the approval and inspection of establishments in accordance with Regulation (EC) No. 853/2004, and in specialist or complex processes relevant to the area. [The Standard – 5.2]</p>	Completed	<p>Officers required to undertake inspections of these 'product specific' types of food premises will be trained and updated before being specifically authorised for that task.</p>	Completed	Training provided.
<p>3.1.13(iii) Ensure that officers receive appropriate training to maintain the competencies necessary to deliver the technical aspects of the work in which they are involved. [The Standard – 5.4]</p>	31/03/13	<p>Officer training will be reviewed and a scheme devised to ensure training is on-going, relevant and structured and provides at least 10 hours continued professional development per year.</p>	Completed	<p>Training plan document produced and staff training updated. Maintenance of CPD linked to officer authorisations procedure.</p>
<p>3.1.13(iv) Maintain records of relevant qualifications, training and experience of each authorised officer in accordance with the Food Law Code of Practice. [The Standard – 5.5]</p>	31/03/13	<p>To be incorporated into revised authorisation procedure (see above 3.1.13(i)).</p>	Completed	Training plan document produced.

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3.3.7 Ensure that food hygiene interventions at food premises in their area are carried out at a frequency which is not less than that determined under the intervention rating scheme set out in the Food Law Code of Practice. [The Standard – 7.1]	30/06/13	<p>All the food premises currently classed as ‘unrated’ require an inspection in order to assign a rating and hence an inspection frequency. The resolution of these ‘unrated’ premises has been given high priority and all should receive a rating before April 2013. Once the extent of the food premises ratings is known a food safety inspection programme can be developed and incorporated into the Food Service Plan 2013/14 (see above item 3.1.6(i)). This will use the full range and flexibility of intervention types.</p> <p>Produce monthly intervention programme including missed inspections.</p>	Completed	As 3.1.6(i) Inspections of unrated premises were mostly completed by 27/03/13. Unrated premises now arising as part of food premises turnover etc. are inspected and rated as a priority, the residue of unrated premises remaining at 1/6/13 were incorporated into this procedure. Database checks run to monitor the number of unrated premises so these are minimised.
3.3.14(i) Further develop and fully implement its documented procedures for the inspection of general food premises and approved establishments to provide operational guidance to officers that is in line with the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.4]	Completed	Review inspection procedures and update with particular reference to approved establishments and cross-contamination risks (E.coli O157). Revise relevant aides-memoire. Further staff training will be delivered on the requirements of procedures.	Completed	Procedures reviewed and developed and staff instructed on new inspection form 05/02/13
3.3.14(ii) Assess the compliance of food premises to legally prescribed standards to confirm compliance with current legislation, the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.2 and 7.3]	31/03/13	Enforcement procedure will be more specific and used to advance formal action in appropriate cases. Consistency and compliance will be included as an agenda item on monthly team meetings.	Completed	Inspector guide to enforcement developed, consistency and inspector monitoring plan implemented - reference 3.5.4 (Monitoring)

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		Procedural changes to be reinforced to staff in a workshop session. Internal monitoring will include officer assessments to business compliance and approach to enforcement.		
3.3.14(iii) Review all product-specific establishments subject to approval under Regulation (EC) No. 853/2004 and ensure that they are inspected and approved in accordance with relevant legislation, the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.2]	30/04/13	Update and refresh officer training for specific approved establishments. Where appropriate re-inspect establishments. Advise FBO, where required, that a new application for approval is necessary.	Completed	Officer training updated in December 2012. All premises reviewed and those requiring approval have submitted new applications. All have reached a satisfactory standard, paperwork being finalised for two premises.
3.3.14(iv) Maintain up to date, accurate and comprehensive records for all establishments including those approved under Regulation (EC) No. 853/2004. The records should detail the determination of compliance with legal requirements and comprehensive reports of all inspections, visits and where relevant the basis for approval, in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard –16.1]	Completed Completed 31/03/13 31/03/13 31/01/14	Identify gaps in approved establishments file information. Obtain missing information as necessary including new application forms where required. Review contents of food safety premises files and establish a standard format, content and indexing. Implement file contents review at next premises inspection. Complete implementation of new indexing system for all food premises files.	Completed	Underway. Approved establishments files reviewed and re-application required where necessary. Specification for food premises file content developed and existing files being systematically weeded, with out of date or spurious information removed. New indexing system developed based on National Land and Property Gazetteer unique referencing sequence. Physical re-ordering of premises paper files based on NLPG reference completed.

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3.3.14(v) Ensure that observations made and/or data obtained in the course of an inspection/intervention are legible and stored in such a way that they are easily retrievable. [The Standard – 7.5]	31/03/13	Review contents of food safety premises files and establish a standard format, content and indexing (as required by and incorporated into 3.3.14(iv)). Audit/Monitoring procedures will include checks to ensure compliance.	Completed	Inspection form revised, audit of file content implemented (see also 3.5.4).
3.4.5 Take appropriate action on any non compliance found, in accordance with the Authority's Enforcement Policy. Any departure from the Enforcement Policy should be recorded along with the reasons for that decision. [The Standard - 7.3 and 15.4]	Completed	Refresh food safety officer knowledge of the Northumberland County Council Corporate Enforcement Policy and Improvement Notice and Prohibition Notice procedures. To incorporate into revised aide-memoire. Produce enforcement flow chart.	Completed	Enforcement workshop 08/04/13 for Food Safety staff to re-enforce enforcement procedures. Enforcement guide produced and circulated to inspectors.
3.5.4(i) 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 Food Law Code of Practice and centrally issued guidance. [The Standard – 19.1]	30/04/13	Review the existing internal monitoring procedure and produce and implement a planned approach to auditing the service. The procedure will include recording checks, results of checks and any corrective actions taken.	Completed	Monitoring system and recording documentation developed: Programme; Interventions; Consistency; Data
3.5.4(ii) Verify its conformance with the Standard, relevant legislation, the Food Law Code of Practice, centrally issued guidance and the Authority's own documented policies and procedure across all the Authority's food law enforcement activities. [The Standard – 19.2]	30/04/13	Develop an audit mechanism to allow conformance checks of documentation and identification of deviations from The Standard. To include in the above at 3.5.4(i).	Completed	Checks incorporated into 3.5.4(i) - final cross check against FSA Audit Checklist (Feb 2010) confirmed building blocks in place - compliance with the Standard will rely on evidence from 3.5.4(i) monitoring.

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3.5.4(iii) Ensure that records of monitoring activities are maintained. [The Standard – 19.3]	30/04/13	Develop conformance check and corrective actions records system. To include in the above at 3.5.4(i).	Completed	System in place.
3.5.11 Maintain up to date, accurate records in retrievable form for all food establishments and related food law enforcement activities in accordance with the Food Law Code of Practice. Records for individual premises should be linked to enable their easy retrieval and provide a complete history of food law enforcement activity. [The Standard – 16.1]	30/04/13	Develop and implement a comprehensive records system. See above at 3.3.14(iv).	Completed	Underway - see 3.3.14(iv) full completion during 2014. All food premises files are now held in the Commercial team office in Morpeth. Historic non-paper records from the former Castle Morpeth Borough Council area are still available on their electronic legacy system if required. These will be kept for six years from the date of the last record.