

Updated Action Plan for Nottinghamshire County Council

Audit date: 22-23 September 2011

Action Plan updated: 13 September 2013

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.3 Further develop the Service Plan, in accordance with the Service Planning Guidance in the Framework Agreement, to include;</p> <ul style="list-style-type: none"> • A comparison of the resources required to deliver the feed law enforcement service against the resources available to the Service • The feed inspection programme together with a feed premises profile including unrated establishments. [The Standard – 3.1] 	31/03/12	Incorporate recommendations in the 2012/13 Service Plan.	Completed	<p>The 2013/14 Service Plan has been produced and approved by members in February 2013. We have stated that we undertake our inspection programme on a risk based and intelligence led approach and are committed to 100% inspection of high risk premises with a lower sample of medium and low risk premises inspections to verify risk ratings. We will review our inspection frequency following the expected change to the Feed Law Enforcement Code of Practice risk rating scheme and the national priorities being set by the Agency and delivered via the National Trading Standards Board in 2014/15. We intend to include a comparison of resources in next year's Service Plan.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.1.12(i) Implement the documented procedure for the authorisation of officers to 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 any centrally issued guidance. [The Standard – 5.1]	31/03/12	At the time of the audit there was only one Level 2 qualified officer within the Authority. It is the intention of the authority to bring all feed officers currently qualified to Level 1 up to Level 2 by the end of 2011/12 financial year.	Completed	Since the audit all five officers are now qualified up to level 2 status.
3.1.12(ii) Review current authorisations to ensure that all officers are appropriately authorised under relevant current legislation and consistent with their qualifications and training. [The Standard – 5.3]	Completed	The Authority is reviewing the current method of authorisation with their legal department to ensure that all officers are appropriately authorised.	Completed	The legal department have given their opinion and are satisfied that current method of authorisation is appropriate.
3.1.15 Ensure all officers authorised to carry out feed law enforcement activities receive relevant ongoing training and complete the necessary 10 hours continuing professional development training in accordance with the Feed Law Enforcement Code of Practice. [The Standard – 5.4]	Ongoing	Current CPD hours are monitored through the Authority's EPDR/supervision process. This is covered in Section 5 of the Quality Manual. CPD hours will be maintained through training provided both internally and externally. The Lead Officer for Feed (Deputy Quality Manager) will ensure that the CPD requirements of the feed qualified officers are identified and incorporated into their training plan.	Completed	An update training course was held for feed qualified officers within the region and officers have also undertaken a level 2 HACCP course. Further training will be planned for the region later in the year. CPD up to date.

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<p>3.1.22 Develop, maintain and implement a documented procedure to ensure that the feed premises database is complete and up to date and that accurate information of feed law activity is reported in official returns to the Agency. [The Standard – 11.2]</p>	<p>30/09/12</p>	<p>It has been recognised by the Authority that the self declaration requirement of the activity code by the applicant may have caused some inaccuracies to occur. This is believed to have been caused due to the misunderstandings of the FSA guidance, by the applicants. To prevent future inaccuracies procedure OP405 now requires officer contact with the applicant to discuss the actual activities they are performing thus ensuring accurate additions to the register. Due to the numbers involved and the resource implications the review of registrations that pre-date this change will have to be carried over into 2012/13. To increase the level of accuracy of current premises that require a registration a systematic search and cross referencing of our database against other data sources will be undertaken.</p>	<p>Completed</p>	<p>All new registration applicants are contacted personally to ensure that they are applying for the correct category(s). By February 2013, all existing registered FeBOs had been contacted and their registration categories verified and/or amended accordingly. We are currently working on a programme to include primary producers.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.2.9(i) Ensure that inspections of feed establishments are carried out a frequency which is not less than that determined under the relevant inspection rating scheme, continuing to give 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]	31/03/12	The Authority will continue to maintain a risk-based intervention programme in line with the Service’s intelligence led approach to work. This will ensure that the resource available to the service is targeted appropriately. Currently this includes 100% inspection at all High Risk premises and other premises targeted as a result of intelligence from complaints and information received from other feed Authorities and agencies and this will continue to be reviewed. In order to increase the level of intelligence received regarding non high risk premises, the authority will task their Animal Health Officers to gather information from on farm visits. All issues identified will be recorded on the services database. In addition interventions will be carried out at a sample of lower risk premises to ensure that they are still appropriately risked.	Completed	Inspection programme as recommendation 3.1.3 above. The service is continuing to prioritise high risk feed establishments for inspections. R10 establishments have been prioritised through desk top surveillance and at the time of the follow up audit in February 2013 20% had been visited. Visits to lower risk establishments where there is livestock are undertaken by Animal Health Officers adopting an ‘eyes and ears’ approach reporting back where there are any problems. Intelligence led investigations are undertaken.

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3.2.9(ii) Carry out interventions/inspections and approve or register feed establishments in accordance with relevant legislation, the Feed Law Enforcement Code of Practice and centrally issued guidance. [The Standard – 7.2 and 7.3]	Completed	The Service will maintain the requirements of procedure OP405 which stipulates that every application for approval is followed up with an inspection and that all applicants for registrations are contacted in person to ascertain the accuracy of their declaration.	Completed	See action comments in 3.1.22.
3.2.9(iii) Ensure that all observations and/or data obtained during the course of an inspection are recorded in accordance with the Feed Law Enforcement Code of Practice. [The Standard – 7.5]	31/03/12	The Service plans to adapt the forms used during the FSA Feed Grant work to ensure that sufficient detail is captured to enable officers to assess the adequacy or otherwise of the business's systems. A debrief will occur at the end of the current grant work where the reporting officers can recount their negative and positive experiences of the forms used. The learning from this will enable amendments into a more appropriate form.	Completed	Detailed inspection records being maintained using the 'adapted to fit' FSA forms.

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<p>3.2.17 Set up and implement a sampling programme that is risk based and takes full account of the National Enforcement Priorities for feed. [The Standard – 12.4 and 12.6]</p>	<p>Completed</p>	<p>The Service adopts an intelligence led approach to sampling based on information from a variety of sources and taking account of the national enforcement priorities. An approach will be made to the FSA to carry out feed sampling analysis which reflects identified priorities and the level of funding available. Officers will be made specifically aware of the FSA national priorities following publication each year so that they can take them into consideration when carrying out an inspection or intervention.</p>	<p>Completed</p>	<p>The Service was part of the TSEM bid for the national co-ordinated feed sampling programme for 2012/13. The Service is involved in one of the national regional pilots as part of TSEM 2013-2014 FSA bid. A sampling plan has been developed based on national and local priorities and the issues that impact most on local business.</p>

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<p>3.2.22 Develop formal enforcement procedures for the full range of enforcement actions and follow up actions available in relation to feed in accordance with the relevant legislation, the Feed Law Enforcement Code of Practice and centrally issued guidance. [The Standard – 15.2]</p>	<p>Completed</p>	<p>The Authority has procedures that cover the full range of follow-up actions in procedure OP527. The procedure refers to the comprehensive Feed Law Enforcement Code of Practice (FLECP) procedures. This approach ensures that our procedures are always up to date with current FSA guidance. It also reduces duplications and unnecessary use of resource in amending the authority's procedure. The current procedure is not detrimental to the ability of officers to take appropriate action. It will be the responsibility of the Deputy Quality Manager to ensure that the FSA FLECP on their website is the current version.</p>	<p>Completed</p>	<p>The existing procedure which makes reference to the Feed Law Code of Practice procedures has been reviewed and the service has concluded that this reference is sufficient.</p>

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<p>3.3.4 Review and implement the internal monitoring procedure to ensure all enforcement activities of the feed law enforcement service are adequately and proportionately monitored in accordance with Article 8 of Regulation (EC) No. 882/2004 (Official Feed and Food Controls), the relevant codes of practice and centrally issued guidance. Records of monitoring checks should be maintained. [The Standard - 19.1, 19.2 and 19.3]</p>	Ongoing	<p>This will be covered by the management review that is carried out throughout the year to ensure that the officers are completing the records correctly. The assistance of the technical manager will be sought where it is believed that specialist knowledge to verify compliance is required. Any corrective actions will be carried out within an appropriate timescale. Any overall trends or issues will be reviewed during the annual review meeting. In addition to this an annual internal audit of the whole quality system will be carried out. The outcome of the audit and any corrective actions will be considered at the annual review meeting.</p>	Completed	<p>Closer communications and monitoring of the feed service have been implemented. An internal audit of the Food and Feed Quality Manual was undertaken 6- 7 February 2012.</p>
<p>3.3.7 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 also a complete and accurate register of feed business establishments. [The Standard – 16.1]</p>	29/02/12	<p>The improvement in the accuracy of the register is dealt with in actions relating to point 3.1.22 above. The issue of the level of detail recorded with regard to inspections is dealt with in actions relating to point 3.2.9 (iii) above.</p>	Completed	<p>Inspection detail much improved, as recommendation 3.2.9 (iii) above. Accuracy of the register has been undertaken as in 3.1.22 above.</p>