

Updated Action Plan for St Helens Council

Audit date: 13-14 November 2012

Action Plan updated: 22 January 2014

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.1.8 Ensure that future Food Service Plans include an accurate and clear comparison of resources required to carry out the full range of statutory food law enforcement activities against the resources available to the Service. [The Standard – 3.1]	30/06/13	During drafting of plans for 2013/14 include a section, which describes a clear comparison between resources required to deliver the service and the resources available. Outline anticipated delivery.	Completed	Section 3 Food Service Plan 2013/14 details service delivery noting the shortfall in inspections of C and D rated premises due to staff availability. Future Service Plans will contain a clear statement on resourcing of the full range of food law enforcement activities carried out by the Service.

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<p>3.1.15 Review and update current officer authorisations 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>	31/01/13	All authorisations to be redrafted to include omitted legislation.	Completed	PEHO and SEHO authorisations redrafted to include legislation. These have been recently updated to take into account new food hygiene regulations. Commercial Services Officer and Graduate Officer are authorised to an appropriate level taking into account their qualifications and experience.
		Technical officer authorisation amended to specify service of HIN C-E's only.	Completed	Technical officer authorisation amended.
		Remove service of remedial action notices from officer authorisations not appropriately experienced/qualified.	Completed	Only PEHO and SEHO qualified and authorised to serve RANs.
		Redraft authorisation procedure to include a practical process to assess the competency of officers.	Completed	Redrafted authorisation procedure.
		Implement a method of recording all in house training initiatives to ensure all officers meet minimum CPD annually.	Completed	Spreadsheet developed to record CPD acquired by all officers annually. Central records also maintained.

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<p>3.2.5 Ensure the database is configured and operated in such a way to provide accurate monitoring returns to the Agency. [The Standard – 6.3]</p>	<p>31/01/13</p>	<p>Explore reasons and solution to mapped AES and LAEMs report.</p> <p>Retain additional spreadsheet monitoring of enforcement actions in order to monitor accuracy of LAEMS returns.</p> <p>Implement method of recording sample visits onto database and include in LAEMS reports.</p> <p>Additional training for officers on correct risk rating, in particular +22 score and +20 score.</p> <p>Include examination of risk rating as part of internal monitoring.</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>Completed</p>	<p>Reconfiguration of relevant database code to ensure AES activities not reported as inspections through LAEMS.</p> <p>Checks carried out prior to submission of return to ensure accuracy. Additional routine monitoring on enforcement actions to be carried out.</p> <p>Food sampling protocol developed.</p> <p>Audit findings were provided to staff in a feedback session Dec 2012. Team meeting 14/01/13 at which risk ratings and the correct use of +22 and +20 scores was discussed.</p> <p>Internal monitoring amended to include examination of risk rating profiles. Outcome of these checks and any identified corrective action is recorded.</p>

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<p>3.3.16(i) 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]</p>	31/01/13	<p>Distribute overdue food inspections amongst officers, to ensure all C rated premises are completed prior to 31 March 2013.</p> <p>Review all E rated premises to determine whether some very low risk can be excluded from the inspection programme.</p>	<p>Revised date for completion: 31/03/14</p> <p>Completed</p>	<p>Officers adhering to policy of concentrating inspections on highest risk establishments. A-C inspections completed as planned for 2012/13. Plan to carry out all due category A-C inspections by 31/03/14 and that all unrated establishments will be reviewed/rated.</p> <p>Completed in team meeting 14/01/13. Officers indicated E rated premises that could be removed from inspection programme.</p>
<p>3.3.16(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, and take appropriate and timely action on any non-compliance found, in accordance with the Authority's enforcement policy. [The Standard – 7.2 and 7.3]</p>	31/01/13	<p>Address inconsistent graduated approach to enforcement by a revisit policy to ensure satisfactory follow up.</p> <p>Review of internal monitoring.</p>	<p>Revised date for completion: 31/03/14</p> <p>Completed</p>	<p>Revised practice and procedure notes. Revisit Policy drafted.</p> <p>Inconsistencies in quality of inspections and follow-up on both general and approved establishments being addressed by internal monitoring activities. In progress.</p> <p>Reviewed procedures 'Food - Internal Quality Monitoring'.</p>
<p>3.3.16(iii) Ensure that product-specific establishments subject to approval under Regulation (EC) No. 853/2004 are inspected and approved in accordance</p>	31/05/13	<p>Re-approve one of the approved establishments to ensure all approval documents are in place.</p>	<p>Completed</p>	<p>Premises re-approved June 2013.</p>

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with relevant legislation, the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.2]		<p>Review all files and ensure all relevant details complete, including reasons for approval.</p> <p>Redraft the inspection report for routine inspections of approved establishments.</p> <p>Redraft the approval procedure to reflect changes.</p>	<p>Completed and ongoing</p> <p>Completed</p> <p>Completed</p>	<p>Files have been reviewed and reorganised. Issues for follow-up identified.</p> <p>‘Approved Premises Update’ inspection report in use.</p> <p>Approval procedure updated.</p>
3.3.16(iv) Maintain 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]	31/01/13	<p>Ensure consistent completion of the aide-memoire ‘Food Premises Detail Form’ during routine inspections of general and approved establishments.</p> <p>Consistent quality of records to be checked as part of routine internal monitoring activities.</p>	<p>Completed</p> <p>Revised date for completion: 31/03/14</p>	<p>Food premises detail form revised. Revised practice and procedure note ‘Food premises primary inspections’.</p> <p>Internal monitoring and audit checks have identified continued inconsistency in quality of inspection records between officers. Corrective action to be implemented.</p>

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3.4.5 Ensure that officers carry out formal food law enforcement actions in accordance with the Food Law Code of Practice, centrally issued guidance and the Authority's own enforcement policy. [The Standard – 15.3 and 15.4]	31/01/13	<p>Implemented a HIN checklist.</p> <p>Amend prosecution file documents to ensure all elements of enforcement policy are considered prior to recommendation of formal action.</p>	<p>Revised date for completion: 31/03/14</p> <p>Completed</p>	<p>Checklist provided as part of practice and procedures and is completed for all HINs. Notices are checked by PEHO prior to service, however some improvements on drafting notices and administering requests for time extension still required.</p> <p>'Enforcement Policy Check Sheet' included in prosecution file documents.</p>
3.5.4(i) Ensure that internal monitoring procedures are documented and implemented across all food law enforcement activities 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]	31/01/13	Redraft internal qualitative monitoring procedures, reducing some requirements, ensuring across all areas of food enforcement and incorporating peer review.	Completed	Redrafted procedures which are being implemented.
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]	31/01/13	As for 3.5.4(i)	Completed	Internal monitoring is taking place of officers' activities across the range of food law enforcement activities. Plan to formalise the accompanied inspections that are taking place as part of the internal monitoring procedure.

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3.5.4(iii) Ensure that records of monitoring activities are maintained. [The Standard – 19.3]	31/01/13	As for 3.5.4(i)	Completed	Records of internal monitoring activities are being routinely maintained.