

Updated Action Plan for Carmarthenshire County Council

Audit Date: 21st – 25th November 2016

Follow-Up Visit Date: 23rd – 24th October 2019

Status Key

	Completed
	Good Progress
	Limited Progress
	No Progress

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
3.23 (i) Ensure future Service Plans for food hygiene and food standards are developed in accordance with the Service Planning Guidance in the Framework Agreement. In particular, an estimate of the resources required to deliver the services against those available should be provided. [The Standard – 3.1]		2019 update: 5 specific actions listed to be included in current year SDP prior to submission	Improvements have been included within the draft Service Plan for 2019/20, in accordance with the Service Planning Guidance.	<p>Ensure that future food service plans are further developed in accordance with the Service Planning Guidance to include the following:</p> <ul style="list-style-type: none"> - an operational level organisational chart, - the number of category B & C food standards interventions due for an intervention (including those overdue from previous years), - the number of unrated food standards establishments, - the number of expected new businesses, - a revised overall assessment of required resources against available resources with a clear statement on the current shortfall in available officers.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>3.23 (ii) Ensure the annual performance review includes all information on the previous year's performance against the food hygiene and food standards Service Plans and any specified performance targets, standards and outcomes. Ensure this review is submitted for approval to either the relevant member forum or appropriately delegated senior officer. [The Standard – 3.2]</p>		<p>2019 update: 2019/20 performance to be reflected in 20/21 SDP to include required criteria</p>	<p>The review of performance against the previous year's targets, included within the Service Plan, contained some of the required information.</p>	<p>Ensure that the annual performance review within the Service Plan includes all information on the previous years' performance against the service plan and any specified performance targets, standards and outcomes including:</p> <ul style="list-style-type: none"> - a review of category B and C rated food standards establishments, - the timeliness of response to reactive interventions such as service requests, infectious disease investigations, - a review of food samples undertaken against the sampling plan, - a revision of the review of Cat A food standards premises to reflect the true percentage achieved, - an explanation for all variances including that for Cat D food hygiene premises. - a statement relating to planned improvements for each area of variance including food standards interventions, food sampling programmes <p>Ensure that the performance review in the Service Plan is approved at the appropriate level in accordance with the Standard.</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
4.6 (i) Ensure that the adopted enforcement policy is updated with current information and references and is reviewed at regular intervals in accordance with document control procedures. [The Standard – 4.1 & 4.2]			A revised and updated Corporate Policy has been provided.	Completed
5.9 (i) Review and amend its authorisations to ensure officers are appropriately authorised under all relevant legislation; and ensure authorisation documents for food hygiene officers are signed by a person delegated with the power to do so in accordance with the Constitution and the authority's procedure. [The Standard – 5.1]		2019 update: Scheme of Delegation to be updated. Matter drawn to the attention of HoS / Legal.	Officers had been correctly authorised in accordance with a revised procedure. Authorisation documents referred to an updated matrix of legislation.	The authority's Scheme of Delegation contained within the Constitution requires updating.
5.9 (ii) Ensure the level of authorisation of all food hygiene and food standards officers is consistent with their qualifications and training. [The Standard – 5.3]			Officers undertaking food activities were authorised in accordance with their qualifications and training.	Completed
5.9 (iii) Ensure all authorised food hygiene officers meet the training requirements set out in the Food Law Code of Practice; including training in HACCP. [The Standard – 5.4]			Officers undertaking food activities met the HACCP requirements.	Completed

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
5.9 (iv) Maintain records of all relevant academic or other qualifications for authorised food hygiene and food standards officers. [The Standard – 5.5]			Training records were being maintained for officers undertaking food activities.	Completed
6.7 (i) Amend the documented procedure for the calibration of thermometers to ensure specified tolerances are in accordance with centrally issued guidance and set-up documented procedures for the maintenance of equipment used by food hygiene and food standards services. [The Standard - 6.2]			The procedure has been amended.	Completed
7.26 (i) Ensure that food hygiene interventions/inspections are carried out at the minimum frequency specified by the Food Law Code of Practice. [The Standard -7.1]		2019 update: Approval to be sought to occupy all vacant posts to help target compliance with recommendation. Recruitment process started. Fully intend on occupying all vacant posts	The numbers of premises overdue for an intervention had not reduced since the original audit whilst the number of overdue category C premises had increased.	Ensure all business establishments receive an appropriate intervention at the correct frequency.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>7.26 (ii) Carry out food hygiene interventions / inspections and approve and register establishments in accordance with the Food Law Code of Practice, centrally issued guidance and its procedures. In particular, ensure that, where applicable, intervention risk rating and follow up are undertaken consistently in accordance with the Food Law Code of Practice, centrally issued guidance, and local procedures. [The Standard – 7.2]</p>			<p>Intervention and approval processes had improved.</p>	<p>Completed</p>
<p>7.26 (iii) Fully assess the compliance of establishments in its area to the legally prescribed standards. [The Standard - 7.3]</p>		<p>2019 update: Review inspection proforma for inclusion Include criteria within Monitoring forms for completeness.</p>	<p>Assessment processes had improved.</p>	<p>Ensure that assessments of HACCP, food handler training, ID marks, imported food and withdrawal and recall procedures are consistently made and recorded.</p> <p>For approved premises ensure that HACCP, food hygiene training, discussions with food handlers, incoming ID / health marks and product recall / withdrawal arrangements are consistently assessed.</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>7.26 (iv) Ensure that the documented procedures for interventions are reviewed to include reference to the local arrangements for red flagging, timescales for revisits and a direction to officers as to whether to take samples. Additionally, amend the documented procedure for approved establishments to include localised arrangements for undertaking interventions and the process of approval. With respect to the Alternative Enforcement Strategy Procedure, amend to include details as to the information that would trigger a visit by the authority. [The Standard – 7.4]</p>			<p>Food hygiene intervention and approved establishment procedures had been amended. Alternative enforcement strategies were no longer in use.</p>	<p>Completed</p>
<p>7.26 (v) Ensure that observations made and/or data obtained in the course of a food hygiene intervention/inspection are recorded in a timely manner to prevent the loss of relevant information. [The Standard – 7.5]</p>		<p>2019 update: Consider application to monitoring / review of specified data capture areas if necessary.</p>	<p>Inspection observation records had improved.</p>	<p>Ensure that observations in relation to the size, scale and scope of businesses are recorded and that assessments cover all aspects of the aide memoire.</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.42 (i) Ensure that food standards interventions/inspections are carried out at the minimum frequency specified by the Food Law Code of Practice. [The Standard -7.1]		2019 update: 2020/21 will strive to complete stand-alone high & medium risk visits within respective frequencies. Standards inspections now aligned with Hygiene.	The numbers of premises risk rated using an appropriate scheme for food standards has increased significantly and a programme is in place to address the remaining premises.	Ensure all business establishments receive an appropriate intervention at the correct frequency.
7.42 (ii) Carry out food standards interventions/inspections in accordance with the Food Law Code of Practice and centrally issued guidance to include using an appropriate risk rating system. [The Standard - 7.2]			Intervention and inspection processes had improved.	Completed
7.42 (iii) Assess the compliance of establishments in its area to the legally prescribed standards [The Standard – 7.3]			Some improvement had been made to assessments of compliance.	Ensure that thorough assessments are made of presentation and labelling, quality management systems, recall and traceability and composition.
7.42 (iv) Amend its interventions procedures to provide guidance on which establishments are eligible for inclusion in an alternative enforcement strategy and the process to follow should a decision be made to use this type of intervention. [The Standard 7.4]	OPEN		Remains untested as no AES was in operation during the relevant time period for this follow up audit.	Amend AES procedures.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.42 (v) Ensure that observations made and/or data obtained in the course of a food standards intervention/inspection are recorded in a timely manner to prevent the loss of relevant information. [The Standard – 7.5]		Ref 7.26 (v)	Recording of observations had improved.	Ensure that observations in relation to the size, scale and scope of a business's activities are consistently recorded.
8.8 (i) Amend the food hygiene complaints procedure to include local arrangements for dealing with complaints regarding the condition of premises. [The Standard - 8.1]			Procedure had been amended.	Completed
8.8 (ii) Ensure that food hygiene and food standards complaints or service requests are actioned in accordance with the requirements set out in local procedures [The Standard 8.2]			Improvements had been made in respect of the way in which complaints and service requests are actioned.	Completed
11.5 (i) Ensure food hygiene and risk rating data and due inspection dates are correctly entered and accurately maintained on the authority's database. Also, ensure that only those establishments that have received a food standards inspection are recorded and rated as such on the database. [The Standard – 11.1]		2019 update: Ongoing Continue with peer review / monitoring role.	Adoption of new food standards intervention procedures has reduced data errors. Improvements in database checks have also reduced data errors.	Ensure checks on database continue to address remaining risk rating and due date errors.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>12.10(i) Amend and implement its sampling policy for the microbiological examination and chemical analysis of food in accordance with the Food Law Code of Practice and centrally issued guidance. In particular, in respect of both services, further details in respect of out of hours sampling should be included. The food standards sampling policy should include information on the notification of results to the Primary Authority and Home/Originating Authority and the policy with regards to the verification monitoring of food, special investigations and imported food. [The Standard – 12.4]</p>			<p>The policy had been amended.</p>	<p>Completed</p>
<p>12.10(ii) Amend and implement its sampling programme for the microbiological examination of food to include specific details of the number of foods to be sampled. [The Standard – 12.4]</p>			<p>The sampling programme had been amended.</p>	<p>Completed</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
12.10 (iii) Amend and implement its documented procedure for microbiological sampling of foods to include information on the specific equipment required to sample, the authority's storage and transport arrangements, information relating to the authority's arrangements for hot/cold, solid/frozen and liquid bulk foodstuff sampling and the authority's arrangements relating to continuity of evidence in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 12.5]			The procedure had been amended.	Completed
12.10 (iv) Document and implement its procedure for the chemical analysis sampling of foods in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 12.5]			The procedure had been amended.	Completed
12.10 (v) Take all appropriate action in accordance with its Enforcement Policy where sample results are not considered to be satisfactory. [The Standard – 12.7]	OPEN		Remains untested as no unsatisfactory samples were available during the relevant time period for this follow up audit.	Take appropriate action where food standards samples are unsatisfactory.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
13.10 (i) Amend its Outbreak Plan to include local contacts and details of neighbouring authorities and other agencies that have a role in the control of outbreaks. [The Standard -13.1]			The outbreak plan was amended.	Completed
13.10 (ii) Amend the procedure for investigation of sporadic cases of food related infectious disease to ensure that all notifications, including Campylobacter, are investigated in accordance with centrally issued guidance. Ensure that the procedure is fully implemented to include investigation of and follow-up of all notifications. [The Standard -13.2]		2019 update: Introduce a second follow up letter for completeness.	The procedure had been partially amended to include investigation of cases of campylobacter by post. The procedure had been fully implemented.	Further amend the procedure to ensure that where a postal questionnaire is used and either not returned or partially returned, that an attempt is made to complete the investigation.
15.28 (i) Review and amend its enforcement policy to include details of its arrangements for ensuring compliance with food hygiene and food standards requirements in establishments where it is the food business operator and ensure it is approved by the appropriate member forum. [The Standard – 15.1]		2019 update: Food Enforcement Policy to be included as appendix at next Enforcement Group.	A revised corporate enforcement policy has been approved containing some of the required information, along with a separate food safety enforcement policy containing most of the required information.	Ensure the food safety enforcement policy is also approved.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>15.28 (ii) Include in its enforcement procedures for Remedial Action Notices, Hygiene Improvement Notices, Hygiene Emergency Prohibition Notices, voluntary closures and detention of food, details of local arrangements, specifically; method and record of service, checks on compliance, and the use of approved templates. It should also include in its Seizure and Detention procedure details of local arrangements, specifically; the use and requirement of associated notices and documents and the local arrangements for bringing foods before a justice of the peace and the destruction and disposal of food. [The Standard - 15.2]</p>			<p>Enforcement procedures had been amended.</p>	<p>Completed</p>
<p>15.28 (iii) Set up documented enforcement procedure for follow up and enforcement actions for imported food in accordance with the Food Law Code of Practice and official guidance. [The Standard -15.2]</p>			<p>The procedure has been documented.</p>	<p>Completed</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>15.28 (iv) Ensure that food law enforcement is carried out in accordance with its procedures, the Food Law Code of Practice, official guidance and centrally issued guidance. [The Standard – 15.2 & 15.3]</p>		<p>2019 update: Templates amended. Address included on IN. Proof of service forms re-circulated.</p> <p>Consideration to enhance enforcement procedure</p>	<p>There was some improvement to enforcement processes.</p> <p>Much of this recommendation remains untested as there were no remedial action notices served, no voluntary surrenders, detentions or certifications of food and no prosecutions or Simple Cautions undertaken during the relevant time period for this follow up audit.</p>	<p>Ensure that Hygiene Improvement Notices bear the address of the local court for appeal purposes; that signed copies of notices are available and that proof of service is recorded. In addition, ensure that timely checks on compliance are made and that appropriate follow up takes place.</p> <p>Ensure that the use of Remedial Action Notices is in accordance with the Food Law Code of Practice; that they bear the address of the local court for appeal purposes; that they match the registration details held on file for the food business, that evidence of service is retained and that timely checks are made on compliance.</p> <p>For Voluntary Surrender, ensure that, the time, place and method of destruction is documented and that there is a record of the destruction, signed by the Officer. For Certification, ensure that records relating to how the food was dealt with and the outcome are retained. For Detentions, ensure that notices are retained and include the location of the detention.</p>

				For prosecution and Simple Caution files, ensure that files are fully worked up including witness statements and that details are provided for the roles of investigating officer, officer in charge, disclosure officer and prosecuting officer (which must accord with the Scheme of Delegation of Powers).
RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
15.28 (v) Ensure its Enforcement Policy is implemented and all decisions on enforcement action are documented and are made following consideration of the enforcement policy. Document the reasons for any departure from the criteria set-out in the Enforcement Policy. [The Standard – 15.1 & 15.4]		2019 update: Prosecution template caters for inclusion of stipulated requirements	<p>Enforcement decisions related to escalating enforcement from food standards interventions were in accordance with Policy.</p> <p>Much of this recommendation remains untested as there were no unsatisfactory samples, no remedial action notices and no prosecutions or simple cautions had taken place in the relevant time period for this follow up audit.</p>	<p>Ensure that decisions relating to escalation of enforcement involving unsatisfactory samples, hygiene improvement notices and remedial action notices are undertaken in accordance with the Policy.</p> <p>Ensure that decisions on Simple Cautions and prosecutions are made in accordance with the Policy.</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>16.8 (i) Maintain up to date accurate records of all food establishments in its area in accordance with the Food Law Code of Practice and centrally issued guidance. These records shall include reports of all interventions / inspections in accordance with Annex 6, details of infectious disease investigations and relevant registration information. The authority should also record, with reasons, any deviations from set procedure. [The Standard – 16.1]</p>		<p>2019 update: Will amend process if necessary.</p> <p>Red file enclosures refer and require inclusion.</p>	<p>Improvements had been made in respect of both approved and non-approved premises records and the content of intervention reports.</p>	<p>Ensure that food registration forms are available and that they are either date-stamped or otherwise recorded on the database.</p> <p>Ensure layout plans, location plans for equipment, water distribution plans, drainage plans and pest controls plans are consistently available on approved establishments files, along with product recall procedures.</p>
<p>16.13 (i) Ensure that businesses are provided with reports following an intervention and that food standards inspection report forms provided following interventions/inspections contain all of the information required by Annex 6 of the Food Law Code of Practice. [The Standard – 16.1]</p>			<p>Inspection reports were available and contained the required information.</p>	<p>Completed</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>19.11 (i) Revise its documented internal monitoring procedure for food hygiene to include checks on the accuracy of the database, checks on officer authorisations and checks on records of investigations into infectious disease notifications. Fully implement food hygiene and food standards procedures to ensure other service delivery activities in addition to inspection file records are also subject to internal monitoring. [The Standard – 19.1]</p>		<p>2019 update: Procedure to be further developed Role to be administered by senior position currently unoccupied.</p>	<p>The documented internal monitoring procedure and associated template forms have been revised to include database checks, officer authorisations, infectious disease investigations.</p> <p>The procedure has been partially implemented.</p>	<p>Ensure that the procedure is further amended to clearly specify minimum frequencies for internal monitoring activities and templates amended to provide a record of the monitoring officer's feedback.</p> <p>Ensure that internal monitoring is being fully implemented in accordance with the internal monitoring procedure including accompanied inspections, and feedback delivered at team meetings.</p>
<p>19.11 (ii) Verify its conformance with the Standard, relevant legislation, the Food Law Code of Practice, centrally issued guidance and the authority's documented policies and procedures for food hygiene and food standards. [The Standard – 19.2]</p>			<p>The scope of the internal monitoring system incorporates all activities and elements.</p>	<p>Completed</p>
<p>19.11 (iii) Ensure records are made of all food standards internal monitoring, including the nature and extent of the monitoring activity and that these are kept for at least two years. [The Standard – 19.3]</p>		<p>Ref 19.11 (i)</p>	<p>Records of most elements of internal monitoring were being maintained.</p>	<p>Ensure that a record of the monitoring officer's feedback is maintained, both individual and at team meetings.</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
20.7 (i) Implement effective remedial actions to address all non-conformances raised from the 2014 Shellfish Traceability and Authenticity Exercise and 2014 audit of official hygiene controls at dairy establishments. [The Standard – 20.2]			Remedial action taken in relation to the recommendations from both focussed audits.	Completed

Summary

Total Recommendations	39
Completed	20
Good Progress	13
Limited Progress	3
No Progress	1
Untested	2
Total Outstanding	19