

Action Plan for Conwy County Borough Council (Excluding Feed Service*)**Audit Date: 14th – 18th September 2015****Follow-Up Visit Date: 22nd – 23rd August 2018**

(*) The service relating to animal feedingstuffs was not included in the original audit. A new regional feed delivery model was introduced in Wales from April 2015.

Status Key

	Completed
	Good Progress
	Limited Progress
	No Action Taken

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	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 and an explanation provided for any variances identified in the service review. [The Standard – 3.1]			Service Plan for 2018/19 largely drafted in accordance with the Service Planning Guidance	<p>Amend the assessment of resources required against those available to include a breakdown across service delivery activities. Ensure all variances are identified and explained during the annual review of service delivery in relation to food standards interventions, food hygiene and shellfish samples, food hygiene category E rated establishments, unrated inspections and food hygiene rating scheme compliance checks.</p> <p>Ensure that these are addressed (where necessary) as areas for improvement.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>4.6 (i) Ensure that all documented policies and procedures are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance. [The Standard – 4.1]</p>		<p>The following procedures are overdue for review and will be completed before March 2017:</p> <ul style="list-style-type: none"> • Database Accuracy Procedure • Regulatory & Housing Enforcement Policy • Detention & Seizure • EPN <p>All other procedures have already been reviewed or will be reviewed as per the procedure review plan.</p>	<p>Procedures have been reviewed and updated and listed on a document review plan.</p> <p>A system for document control has been introduced which generates a procedure review report and email reminders of when a specific procedure is due for review.</p>	<p>Completed.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
5.10 (i) Ensure all authorised officers meet the training requirements set out in the Food Law Code of Practice; including training in HACCP. [The Standard – 5.4]			<p>The three-day HACCP training for enforcement officers has been completed by two additional officers.</p> <p>Officers have met the minimum requirements of the Code in relation to CPD training.</p>	Completed.
5.10 (ii) Maintain records of relevant academic or other qualifications for authorised food standards officers. [The Standard – 5.5]			Records of qualifications are maintained for all officers.	Completed.
6.8 (i) Ensure temperature monitoring equipment is calibrated frequently and amend the documented procedure for calibrating temperature measuring equipment to include tolerances in accordance with centrally issued guidance. [The Standard - 6.2]			Procedure updated and implemented. Calibration records maintained in accordance with procedure.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>7.23 (i) Ensure that food hygiene establishment interventions/inspections are carried out at the minimum frequency specified by the Food Law Code of Practice. [The Standard -7.1]</p>		<p>99 businesses are still due for an AES from 2015/16 which have been programmed into the intervention plan for 16-17.</p> <p>The requirement to carry out new business inspections within 28 days remains a challenge for the team given the seasonal nature of the area which leads to significant peaks in work during certain months of the year. Where it is not possible to inspect a business within 28 days then electronic file notes will be made to account for the delay.</p>	<p>Significant reduction in numbers of overdue interventions and unrated establishments.</p>	<p>Ensure all businesses receive an appropriate intervention at the correct frequency.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>7.23 (ii) Carry out food hygiene interventions / inspections in accordance with the Food Law Code of Practice and centrally issued guidance, and the authority's policies and procedures. [The Standard – 7.2]</p>		<p>Intervention procedure to be reviewed to include the process involved in inspection of approved establishments.</p> <p>In addition a review of 'Approved Premises' files is planned for 2016/17.</p> <p>Approved premises files are currently being transferred to electronic files.</p>	<p>Improvements in the process of approving food premises in a timely manner.</p> <p>Some evidence of recording reasons for downgrading risk ratings.</p> <p>Timeliness of revisit untested.</p>	<p>Ensure that the risk rating issued consistently reflects inspection observations and that the correct process is followed on receipt of registration forms.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>7.23 (iii) Assess the compliance of establishments in its area to the legally prescribed standards; and take appropriate action on any non-compliance found, in accordance with the authority's Enforcement Policy. [The Standard -7.3] (Food Hygiene)</p>		<p>A standard intervention form is used for all premises inspected however consideration will be given to the development of a Manufacturers Intervention Form or other 'Premises Specific' intervention forms.</p> <p>In addition a review of 'Approved Premises' files is planned for 2016/17.</p> <p>Enforcement Policy is to be reviewed and changes communicated to the team. Internal monitoring will include monitoring of appropriate escalation of enforcement and discussed during 1:1's.</p>	<p>Improvements in relation to cross contamination assessments, food hygiene training assessments and taking appropriate enforcement action. Improvements in relation to approved premises HACCP assessments and personal hygiene.</p>	<p>Ensure that thorough assessments are consistently undertaken in relation to HACCP (non-approved premises), discussions with food handlers and checks on incoming ID marks and imported foods.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.23 (iv) Amend its procedure for Food Hygiene AES and fully implement its documented procedures in relation to inspections and revisits of food premises. [The Standard – 7.4]		AES visits for food standards have been allocated to our Food Safety Officer this year which involves the completion of the food standards part of the intervention form.	Procedure amended.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.23 (v) Ensure that observations made in the course of a Food Hygiene inspection are recorded in a timely manner to prevent loss of relevant information. [The Standard – 7.5]		Communicate the requirement for officers to make appropriately detailed records of observations made during inspections through team meetings, 1:1's, performance reviews, and undertake routine internal monitoring to verify compliance.	<p>Improvements in relation to the recording of cross contamination assessments, food hygiene training assessments, taking appropriate enforcement action and recording the size and scale of business operations.</p> <p>Improvements in record keeping and the use of an appropriate aide memoire for approved premises and in the recording of HACCP assessments, personal hygiene checks, range of products and food hygiene training assessment.</p> <p>Records relating to AES activity untested.</p>	Ensure that observations are consistently recorded in relation to HACCP assessments, discussions with food handlers, checks on incoming ID marks and imported foods and suppliers details.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.40 (i) Ensure that food standards interventions are carried out at a frequency which is not less than that determined by the Food Law Code of Practice. [The Standard - 7.1]		<p>Overdue and due 'B' rated premises will be inspected before the end of the financial year.</p> <p>From 2017-18 the inspection programme will be based on the earliest due date for either Food Standards or Food Hygiene.</p> <p>These requirements will be monitored via 1:1's, performance reviews, and routine internal monitoring to verify compliance.</p>	<p>Significant reduction in numbers of overdue interventions.</p> <p>Premises outside the scope of the programme reduced to zero.</p>	Ensure all businesses receive an appropriate intervention at the correct frequency.
7.40 (ii) Carry out food standards interventions / inspections and register establishments in accordance with relevant legislation, the Food Law Code of Practice and centrally issued guidance. [The Standard - 7.2]		These requirements will be communicated via Team Meetings, 1:1's, performance reviews, and routine internal monitoring undertaken to verify compliance.	Improvements in the risk rating being consistent with findings and in inspections being carried out without prior notice being given.	Ensure that revisit and follow-up decisions are consistent with findings.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.40 (iii) Assess the compliance of establishments in its area to the legally prescribed standards for Food Standards [The Standard – 7.3]		These requirements will be communicated via team meetings, 1:1's, performance reviews, and routine internal monitoring undertaken to verify compliance.	Improvements in presentation assessments, withdrawal / recall arrangement assessments and quality management system assessments.	Ensure that thorough assessments are consistently undertaken in relation to labelling, composition and traceability.
7.40 (iv) Ensure the documented AES procedure for Food Standards reflects the requirements of the Food Law Code of Practice and Practice Guidance. [The Standard 7.4]			Procedure amended.	Completed.
7.40 (v) Ensure that observations and/or data made in the course of a Food Standards intervention/inspection are recorded in a timely manner to prevent the loss of relevant information, and that all records of interventions are stored in such a way that they are retrievable. [The Standard – 7.5]			Improvements in relation to recording and retrieving inspections notes, recording unannounced inspections in inspection reports and recording food activities undertaken.	Ensure that unannounced inspections are recorded on the aide memoire and that assessments consistently cover labelling, composition and traceability requirements.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
8.9 (i) Further develop its documented procedure in relation to complaints about food and food establishments; and, amend the procedure to include details of its approach to complaints relating to food originating from other EU member states or third countries. [The Standard - 8.1]		This procedure is scheduled for review during 16-17 and will be updated to include the approach to complaints that originate from other EU states.	Procedure amended.	Completed.
8.9 (ii) Ensure food hygiene and food standards complaints are investigated in accordance with centrally issued guidance and the authority's policies and procedures; including responding within target times, and communicating with all relevant parties. [The Standard – 8.2]		These requirements will be communicated via team meetings, 1:1's, performance reviews, and routine internal monitoring undertaken to verify compliance.	Food hygiene complaints investigated, as necessary to completion and complainant advised of outcome. Improvements in food standards complaints being appropriately investigated, contact being made with suppliers and other local authorities and in notifying interested parties of the outcome.	Ensure food standards complaints are consistently investigated without delay.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
13.7 (i) Amend its Outbreak Control Plan to include local information. [The Standard - 13.1]		Local Contact Details to be updated in the Plan.	Outbreak Plan amended.	Completed.
13.7 (ii) Amend and fully implement its documented procedure for investigation of infectious diseases to include the method for cross referencing common notifications to identify the source and the follow up of implicated food establishments. [The Standard -13.2]		This procedure is scheduled for review during 16-17 and will be updated to cross reference how the team communicate potentially implicated food establishments.	Procedure amended and implemented.	Completed.
13.7 (iii) Ensure that all records relating to the control and investigation of outbreaks and food related infectious disease are kept for at least 6 years. [The Standard -13.3]		'Alleged Food Poisoning' questionnaire to be developed that can be completed or e-mail to customers for completion.	Records available.	Completed.
14.5 (i) Further develop the documented procedure for initiating and responding to food alerts. The procedure shall include arrangements for receiving food alert notifications out- of hours. [The Standard – 14.1]			Procedure updated.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>15.19 (i) Review and amend its enforcement policy to include criteria for the use of all available food enforcement options and reference to the Primary and Home Authority Schemes. [The Standard – 15.1]</p>		<p>Enforcement Policy to be reviewed during 2016-17 and updated to include recommendations.</p> <p>Communicate the requirements of the Enforcement Policy, and expectations in line with Codes of Practice and guidance.</p> <p>Undertake routine internal monitoring to verify compliance in this area.</p>	<p>The Enforcement Policy has been reviewed and updated to include the criteria for prosecutions and to include reference to the Primary Authority scheme.</p>	<p>Include the criteria for the use of all enforcement options (including legal notices) and include reference to the Home Authority scheme. Approve the amended enforcement policy.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
15.19 (ii) Set up, maintain and implement documented enforcement procedures for follow up and enforcement actions in accordance with the Food Law Code of Practice and official guidance. [The Standard -15.2]		<p>A prosecution template is in use which includes formal cautions however a specific procedure will be written as recommended.</p> <p>All other procedures will be reviewed in line with the review plan.</p>	Procedures have been developed and implemented covering voluntary closures, remedial action notices, improvement notices, voluntary surrender, simple cautions and prosecutions. The detention and seizure procedure has been amended to include local arrangements.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>15.19 (iii) Ensure that food hygiene enforcement is carried out in accordance with the Food Law Code of Practice and centrally issued guidance, and ensure all decisions on enforcement action are made following consideration of the authority's Enforcement Policy. Document the reasons for any departure from the criteria set-out in the Enforcement Policy. [The Standard - 15.3 and 15.4]</p>		<p>Internal monitoring procedure will be reviewed and developed to ensure that actions are taken in accordance with the relevant legislation and guidance.</p> <p>Communicate the requirements of the Food Law Code of Practice, centrally issued guidance and the authority's procedures to officers, and routinely undertake internal monitoring to verify compliance.</p>	<p>Improvements in relation to voluntary closure, confirmed in writing with compensation statement and lifted in writing.</p> <p>No Hygiene Improvement Notices or Remedial Action Notices served or Simple Cautions issued so remains partially untested.</p>	<p>Ensure suitable frequency of checks to ensure business does not operate whilst voluntary closure remains in place.</p> <p>Ensure that voluntary surrender agreements include the time, place and method of destruction of the food. Include a statement / agreement for the owner to pay the reasonable expenses of destruction or disposal of the food.</p> <p>Ensure that further enforcement decisions in relation to premises that have been closed are made following consideration of the authority's Enforcement Policy. Document the reasons for any departure from the criteria set-out in the Enforcement Policy.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>16.8 (i) Maintain up to date, accurate records in a retrievable form on all relevant food establishments in accordance with the Food Law Code of Practice and centrally issued guidance. These records should include food registration and approval information, reports of all interventions / inspections, the determination of compliance with legal requirements made by the officer and details of action taken. The authority should also record, with reasons, deviations from set procedures. [The Standard – 16.1] (Food Hygiene)</p>		<p>To communicate the need to ensure a review of the information recorded on APP prior to inspections to ensure that food business registration details are up to date. This will help ensure letters are sent to the appropriate head office/registered office address.</p> <p>Timescales for compliance to be included within inspection reports.</p> <p>Review of 'Approved Premises' files planned for 16/17.</p>	<p>Improvements in relation to detailing follow-up action, indicating if samples were taken, correct addressee, correct address and reports timely.</p> <p>All key information available on approved establishments files, stored electronically.</p> <p>No AES records so remains partially untested.</p>	<p>Ensure that the core elements of a business's HACCP are consistently retained, that registration forms are available and timescales for compliance are provided within inspection reports.</p> <p>Ensure that photographs / digital images and labels and commercial documents bearing the identification mark are stored on approved premises files (where appropriate).</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>16.14 (i) Maintain up to date, accurate food standards records on food establishment files including reports of all interventions/inspections, the determination of compliance with legal requirements made by officers, details of action taken where non-compliance is identified and details of any enforcement action taken. The authority should also record, with reasons, deviations from set procedures. [The Standard – 16.1]</p> <p>(Food Standards)</p>		<p>Timescales for compliance to be included within inspection reports.</p>	<p>Improvements in maintaining accurate food standards records including food law under which the inspection was conducted, contact details of a senior officer, the food authority's address and separation of legal requirements and recommendations.</p>	<p>Ensure that documents and other records examined are consistently recorded and that timescales for compliance are provided.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
19.9 (i) Revise and fully implement documented internal monitoring procedures to improve the qualitative assessment of the full range of food hygiene and food standards activities. [The Standard – 19.1]		Whilst the Authority already has an Internal Monitoring Procedure in place, this will be reviewed to improve the qualitative assessment and wider scope of activities.	Documented internal monitoring procedure reviewed and partly implemented.	Ensure the internal monitoring procedure is fully implemented to improve the qualitative assessment of the full range of food hygiene and standards activities.
19.9 (ii) For food hygiene and food standards, 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. [The Standard – 19.2]		Additional internal monitoring to be undertaken to verify compliance.	Scope of internal monitoring system incorporates all activities and elements.	Completed.

Summary.

Total Recommendations	28
Completed	13
Good Progress	14
Limited Progress	1
No action	0
Total Outstanding	15