

Updated Action Plan for Shared Regulatory Services

Audit Date: 15th – 23rd March 2017

Follow-Up Visit Date: 3rd – 4th September 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]			Improvements have been included within the Service Plan for 2019/20, in accordance with the Service Planning Guidance.	Ensure that future food service plans are further developed in accordance with the Service Planning Guidance to include the following: <ul style="list-style-type: none"> - Within the Port Health plan, an estimated number of sanitation check inspections, boarding inspections and manifest checks expected to be undertaken within the year, based on previous years' activity.
3.23 (ii) Ensure the annual performance review includes all information on the previous year's performance against the food service plan and any specified performance targets, standards and outcomes. [The Standard – 3.2]			The annual performance review included within the Service Plan contained some of the required information.	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: <ul style="list-style-type: none"> - Clear performance data for interventions achieved. - A review of category B and C rated food standards establishments. - The timeliness of response to notifications of infectious disease.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>3.23 (iii) Ensure all variances in meeting the food service plan is addressed in its subsequent plan. [The Standard – 3.3]</p>			<p>Most variances are identified, explained and included as areas for improvement in the subsequent plan.</p>	<p>Ensure all variances are addressed including:</p> <ul style="list-style-type: none"> - Variances in achieving due Category B and C food standards interventions. - The variance in the reported number of unrated establishments in relation to those unrated establishments that carry a historic food standards rating that was not assigned in accordance with the Food Law Code of Practice. - The variance in food standards samples taken in relation to the planned programme of samples.
<p>5.9 (i) Ensure an appropriate number of authorised officers are appointed to deliver food hygiene and food standards official controls in accordance with the Food Law Code of Practice. Ensure the level of authorisation of officers is consistent with qualifications, training and experience in all cases. [The Standard – 5.3]</p>			<p>The authorisations of trading standards officers are under review using a revised approach to the assessment of competence.</p>	<p>The resource assessment in the Service Plan indicates a variance between the actual number of full-time equivalent (FTE) officers in post when compared to the estimate of numbers of FTE's required.</p> <p>There is a shortfall in rated and unrated food hygiene and food standards interventions completed in accordance with the frequencies prescribed within the Food Law Code of Practice.</p> <p>Ensure an appropriate number of authorised officers are appointed to deliver food hygiene and food standards official controls.</p> <p>Ensure that revised authorisation documents are issued for trading standards officers based on their qualifications, training and experience.</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
5.9 (ii) Ensure all authorised officers meet the training requirements set out in the Food Law Code of Practice. [The Standard – 5.4]			Training undertaken by officers met requirements.	Completed.
5.9 (iii) Maintain records of all relevant training and experience for authorised officers. [The Standard – 5.5]			Records of training and experience were being maintained.	Completed
7.30 (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]			The numbers of high risk, lower risk and unrated premises overdue for an intervention had increased since the original audit.	Ensure all business establishments receive an appropriate intervention at the correct frequency.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>7.30 (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 is undertaken consistently and the alternative enforcement scheme is carried out 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>Ensure a record of the date of receipt is maintained for all registration forms.</p> <p>Ensure the correct process of approval of premises is consistently followed.</p> <p>Ensure that an inspection is undertaken where appropriate following the conduct of alternative enforcement scheme activity.</p>
<p>7.30 (iii) Fully 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 its enforcement policy. [The Standard – 7.3]</p>			<p>Assessment processes had improved.</p>	<p>Ensure that checks on imported foods and incoming ID marks are consistently undertaken.</p> <p>For approved premises ensure that incoming ID / health marks and application of outgoing ID marks are consistently assessed.</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>7.30 (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 Alternative Food Safety Intervention Procedure, to advise on action to be taken with unresponsive businesses. [The Standard – 7.4]</p>			<p>Food hygiene intervention procedures and the aide memoire had been updated.</p>	<p>Completed.</p>
<p>7.30 (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>Recording processes had improved.</p>	<p>Ensure that the scale of a business' activities is consistently recorded during interventions.</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.40 (i) Carry out ship inspections in accordance with the Food Law Code of Practice, centrally issued guidance and its procedures. In particular, ensure that, inspection reports and ship exemption certificates are completed in line with its procedures. [The Standard – 7.2]			Improvements noted in the consistency of ship interventions records, reports and certificates. Reports consistently provided to owner, company and other authorities where appropriate.	Ensure observations are recorded and maintained on file for all sanitation inspections and that all reports contain the build date, whether samples were taken, and the designation of the officer.
7.40 (ii) Fully assess the compliance of establishments in its area to the legally prescribed standards. [The Standard – 7.3]			Improvements noted in the consistency of ship intervention assessments.	Ensure all ship inspections involve a full assessment of compliance against appropriate requirements.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.55 (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]			The numbers of risk rated and unrated premises that were overdue for an intervention had increased since the original audit.	Ensure all business establishments receive an appropriate intervention at the correct frequency.
7.55 (ii) Carry out food standards interventions/inspections in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.2]			Risk ratings were now being applied and using an appropriate risk rating scheme.	Ensure that only those premises eligible for AES are included and that no risk rating is applied following an AES intervention.
7.55 (iii) Assess the compliance of establishments in its area to the legally prescribed standards [The Standard – 7.3]			Assessments had improved in relation to manufacturing establishments	Ensure that relevant food standards activities are consistently assessed, where appropriate.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>7.55 (iv) Review, amend and implement the food standards inspection procedure to include information related to the recording of significant breaches, timeframes for follow-up action and the approach to dealing with new business inspections to ensure the procedure is in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.4]</p>			<p>The procedure has been amended.</p>	<p>Completed.</p>
<p>7.55 (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]</p>			<p>Some improvement in recording of observations including the development of an aide-memoire for manufacturing premises.</p>	<p>Ensure that contemporaneous records of inspection observations are available in all cases and that the size and scale of a business' activities are consistently recorded.</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
8.7 (i) Ensure that food hygiene and food standards complaints or service requests are investigated in accordance with the Food Law Code of Practice, centrally issued guidance and the Service's procedure. [The Standard – 8.2]			<p>Food hygiene complaints had consistently been investigated in accordance with requirements.</p> <p>Where appropriate, follow up action had been taken in response to food standards service request investigations.</p>	Ensure food standards service request investigations are thoroughly investigated, in a timely manner and that, where applicable, complainants are notified of the outcome in all cases.
9.6 (i) Ensure it liaises with the Primary authorities in relation to offences identified from unsatisfactory food hygiene sample results. [The Standard – 9.1]			Improvements had been made to processes.	Completed.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>11.5 (i) Ensure risk rating data, due inspection dates for both food hygiene and food standards and food hygiene enforcement data are correctly entered and accurately maintained on the Service's database. Also ensure that only those establishments that have received a food standards inspection are rated as such on the database whilst only those subject to an alternative intervention are coded accordingly. [The Standard – 11.1]</p>			<p>Full adoption of new database has reduced data errors.</p>	<p>Ensure checks on database risk rating errors and due dates are implemented. Ensure enforcement actions are correctly coded on the database. Ensure unrated establishments that carry a historic food standards rating that was not assigned in accordance with the Food Law Code of Practice are identified as unrated.</p>
<p>11.5 (ii) Fully implement its documented procedures for ensuring its database is accurate, reliable and up to date at all times. [The Standard – 11.2]</p>			<p>Premises database maintained up to date.</p>	<p>Completed.</p>
<p>12.12 (i) Review and amend 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. [The Standard – 12.4]</p>			<p>The sampling policy had been amended.</p>	<p>Completed.</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
12.12 (ii) Review and amend its documented procedures for microbiological sampling and chemical analysis of foods in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 12.5]			The sampling procedure had been amended.	Completed.
12.12 (iii) Ensure that businesses are informed of unsatisfactory food hygiene sample results in accordance with its documented policy and procedure. [The Standards – 12.6]			Businesses notified as appropriate.	Completed.
12.12 (iv) Take appropriate action in accordance with its Enforcement Policy where food hygiene sample results are not considered to be satisfactory. [The Standard – 12.7]			Action taken was consistent with the Enforcement Policy.	Completed.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>15.21 (i) Review, amend and implement its procedures for Hygiene Improvement Notices (HINs), Remedial Action Notices (RANs), Hygiene Emergency Prohibition Notices (HEPNs), voluntary closure agreements and detention, seizure, Regulation 27 certification and surrender to include details of local arrangements, specifically; drafting (including the use of approved templates), method and record of service. Procedures for Hygiene Improvement Notices, Remedial Action Notices Hygiene Emergency Prohibition Notices, voluntary closure agreements should be amended to include arrangements for monitoring compliance whilst prohibition procedures should also include local legal processes for applying for a Court Order. The procedures for detention, seizure, Regulation 27 certification and surrender should be amended to include local arrangement for condemnation and destruction or</p>			<p>Procedures for enforcement actions had been amended.</p>	<p>Completed.</p>

disposal of food. [The Standard - 15.2]				
RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
15.21 (ii) Set up documented enforcement procedures for follow up and enforcement actions in relation to food information improvement notices, prosecutions, simple cautions and imported food in accordance with the Food Law Code of Practice and official guidance. [The Standard -15.2]			Procedures for the inland control of imported food and prosecution and simple caution had been documented.	Ensure that the procedure for use of food information Improvement Notices is documented. Ensure that officers are clearly directed to the location of any template documents to be used in association with the prosecution and simple caution procedures.
15.21 (iii) 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]			Enforcement actions and processes had improved, in respect of HINs, RANs, Voluntary Closures and Voluntary Surrenders.	Ensure that timely compliance checks are completed in relation to HINs and RANs and details of the local court are included with each RAN. Ensure that evidence of the correct authorisation and agreement with relevant tests by the local authority Prosecuting Officer, for each prosecution, is maintained by each of the local authorities on the SRS case files. Ensure that records of disclosure are signed in accordance with procedures.
15.21 (iv) Ensure its Compliance and Enforcement Policy is fully implemented and the reasons for any departure from the criteria set-out in the Policy are recorded. [The Standard – 15.1 & 15.4]			Compliance and Enforcement Policy implemented consistently.	Completed.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>16.7 (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 containing all of the information required by Annex 6 of the Food Law Code of Practice, the core elements of HACCP, the determination of compliance with legal requirements made by the authorised officer, details of action taken where non-compliance was identified, the details of any enforcement action taken and for approved establishments, the information required by Annex 10 of the Food Law Code of Practice. [The Standard – 16.1]</p>			<p>Improvements had been made in respect of both approved and non-approved premises records and the content of intervention reports.</p>	<p>Completed.</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>16.12 (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 containing all of the information required by Annex 6 of the Food Law Code of Practice, the determination of compliance with legal requirements made by the authorised officer, sampling results and complaints. The authority should also record, with reasons, any deviations from set procedure. [The Standard – 16.1]</p>			<p>Report forms were consistently retrievable for non-manufacturing premises.</p>	<p>Ensure that an appropriate intervention report is retrievable for all interventions and that it contains all of the information set out in Annex 6.</p>
<p>16.12 (ii) Ensure records are kept for at least 6 years. [The Standard – 16.2]</p>			<p>Record keeping improved.</p>	<p>Completed</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
19.11 (i) Fully implement its documented internal monitoring procedures to include food standards interventions undertaken by all teams, port health interventions, infectious disease investigations, incidents, food standards service requests, AES, and sampling follow ups. [The Standard – 19.1]			Internal monitoring procedures partially implemented.	Fully implement the procedures in accordance with the recommendation; ensuring that records of internal monitoring are developed and completed. Ensure that sufficient resources are provided to allow internal monitoring activities to be undertaken in accordance with the authority's procedures.
19.11 (ii) For both food hygiene and food standards services, verify its conformance with the Standard, relevant legislation, the relevant Codes of Practice, centrally issued guidance and the authority's documented policies and procedures. [The Standard – 19.2]			Limited activities to verify conformance had been implemented.	Ensure the system for internal monitoring allows for full verification of conformance. Ensure that sufficient resources are provided to allow internal monitoring activities to be undertaken in accordance with the authority's procedures.

Summary

Total Recommendations	35
Completed	14
Good Progress	13
Limited Progress	6
No Progress	2
Untested	0
Total Outstanding	21