

Updated Action Plan for Shared Regulatory Services
Audit Date: 15th – 23rd March 2017
Follow-Up Visit Date: 3rd – 4th September 2019

Audit Visit Date: 5th - 6th February 2025

Status Key

Blue	Completed
Green	Good Progress
Amber	Limited Progress
Red	No Progress

Annex 2

RECOMMENDATION	STATUS	PREVIOUSLY OUTSTANDING	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]	Blue	Ensure that future food service plans are further developed in accordance with the Service Planning Guidance to include the following: 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.	Programmes of interventions for the year included all due interventions. Estimated numbers of port health checks had also been included.	Completed
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]	Amber	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.	Annual performance review reports on interventions achieved in the previous year but does not clearly the numbers and risk profile of the outstanding interventions.	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	OUTSTANDING	PROGRESS TO DATE	OUTSTANDING
3.23 (iii) Ensure all variances in meeting the food service plan is addressed in its subsequent plan. [The Standard – 3.3]	Amber	<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. 	Some variances addressed including the unrated establishments that carry a historic food standards rating that was not assigned in accordance with the Food Law Code of Practice.	<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 food standards samples taken in relation to the planned programme of samples.

RECOMMENDATION	STATUS	OUTSTANDING	PROGRESS TO DATE	OUTSTANDING
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]	Green	<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>	<p>The resource assessment in the Service Plan indicates a shortfall in the number of officers required to deliver the service.</p> <p>Food standards officer authorisation certificates had been updated and are based on qualifications, training and experience.</p> <p>FHRS consistency validation was being applied to contractors.</p>	Ensure an appropriate number of authorised officers are appointed to deliver food hygiene and food standards official controls.
5.9 (ii) Ensure all authorised officers meet the training requirements set out in the Food Law Code of Practice. [The Standard – 5.4]	Blue	Completed.		

RECOMMENDATION	STATUS	OUTSTANDING	PROGRESS TO DATE	OUTSTANDING
5.9 (iii) Maintain records of all relevant training and experience for authorised officers. [The Standard – 5.5]	Blue	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]	Green	Ensure all business establishments receive an appropriate intervention at the correct frequency.	Risk-based plan in place to re-align with intervention frequencies of Code by end 2024/25.	Ensure all business establishments receive an appropriate intervention at the correct frequency.
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]	Blue	<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>Dates being recorded.</p> <p>Correct process of approval being applied.</p> <p>AES scheme being undertaken in accordance with requirements.</p>	Completed.

RECOMMENDATION	STATUS	OUTSTANDING	PROGRESS TO DATE	OUTSTANDING
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]	Blue	<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>	Checks undertaken on imported foods and incoming ID marks at registered and approved premises, as well as outgoing ID marks at approved premises.	Completed.
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]	Blue	Completed.		
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]	Blue	Ensure that the scale of a business' activities is consistently recorded during interventions.	Scale of activities recorded.	Completed

RECOMMENDATION	STATUS	OUTSTANDING	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]	Blue	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.	Observations recorded and maintained on file for all sanitation & boarding inspections and reports contain the required information.	Completed
7.40 (ii) Fully assess the compliance of establishments in its area to the legally prescribed standards. [The Standard – 7.3]	Blue	Ensure all ship inspections involve a full assessment of compliance against appropriate requirements.	Compliance assessed in accordance with APHA agreed protocols.	Completed
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]	Amber	Ensure all business establishments receive an appropriate intervention at the correct frequency.	Plan to re-align with intervention frequencies of Code by end 2025/26. New ways of working improving intervention rate but number of backlog of overdue establishments not targeted by food standards risk or fully quantified.	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]	Blue	Ensure that only those premises eligible for AES are included and that no risk rating is applied following an AES intervention.	Low risk establishments now receiving an inspection.	Completed.
RECOMMENDATION	STATUS	OUTSTANDING	PROGRESS TO DATE	OUTSTANDING

7.55 (iii) Assess the compliance of establishments in its area to the legally prescribed standards [The Standard – 7.3]	Amber	Ensure that relevant food standards activities are consistently assessed, where appropriate.	Lower risk intervention records demonstrated that appropriate assessments of relevant activities was taking place.	Ensure that relevant food standards activities are consistently assessed, where appropriate in higher risk establishments.
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]	Blue	Completed.		
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]	Amber	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.	Inspection observations in lower risk premises were sufficient and size and scale of activities was recorded.	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 in higher risk premises.
RECOMMENDATION	STATUS	OUTSTANDING	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]	Green	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.	Investigations were consistently thorough and complainants were notified of the outcome, where appropriate.	Ensure food standards service request investigations are consistently investigated in a timely manner.
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]	Blue	Completed.		
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]	Green	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.	Individual premises data checks taking place as part of internal monitoring. Enforcement actions correctly coded. Unrated establishments that carry a historic food standards rating that was not assigned in accordance with the Food Law Code of Practice are now identified as unrated.	Ensure full database checks on data quality are undertaken and risk rating, due date errors rectified.
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]	Blue	Completed.		
RECOMMENDATION	STATUS	OUTSTANDING	PROGRESS TO DATE	OUTSTANDING

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]	Blue	Completed.		
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]	Blue	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]	Blue	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]	Blue	Completed.		
RECOMMENDATION	STATUS	OUTSTANDING	PROGRESS TO DATE	OUTSTANDING

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 disposal of food. [The Standard - 15.2]	Blue	Completed.		
RECOMMENDATION	STATUS	OUTSTANDING	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]	Blue	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.	Procedure for use of food standards improvement notices documented. Officers directed to use for template for process for prosecution and simple caution files.	Completed
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]	Green	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.	Timely compliance checks undertaken for HINs & RANs. Details of the local court are included with RANs. Correct authorisation of prosecutions is taking place within the limitations of the service.	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]	Blue	Completed.		
RECOMMENDATION	STATUS	OUTSTANDING	PROGRESS TO DATE	OUTSTANDING

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]	Blue	Completed.		
RECOMMENDATION	STATUS	OUTSTANDING	PROGRESS TO DATE	OUTSTANDING

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]	Green	Ensure that an appropriate intervention report is retrievable for all interventions and that it contains all of the information set out in Annex 6.	Reports for high risk premises were consistently retrievable and included most of the required information.	Ensure that an appropriate intervention report and contains: <ul style="list-style-type: none"> • specific food law under which intervention conducted • areas inspected/audited (to be specified) • documents and/or other records examined (to be specified) • samples taken (to be specified) • key points discussed during the visit (to be specified) • action to be taken by the Food Authority (to be specified) • contact details of senior officer in case of dispute
16.12 (ii) Ensure records are kept for at least 6 years. [The Standard – 16.2]	Blue	Completed		
RECOMMENDATION	STATUS	OUTSTANDING	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]	Green	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.	Evidence of internal monitoring includes port health interventions, infectious disease investigations, incidents, food standards service requests and sampling follow ups . Sufficient resources are available to allow internal monitoring to be undertaken.	Ensure that monitoring includes bulk database checks and monitoring of AES activities and that appropriate records are maintained to demonstrate such monitoring.
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]	Green	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.	The system mostly allows for verification of full conformance. Sufficient resources are available to allow internal monitoring to be undertaken.	Further develop the internal monitoring system to include bulk database checks and monitoring of AES activities.

RECOMMENDATION	STATUS	OUTSTANDING	PROGRESS TO DATE	
Food Hygiene Rating Scheme audit actions relating to service planning & delivery.	Blue		Service plan amended in relation to FHRS. Duplicate intervention programme recommendations closed.	Completed.
Food Hygiene Rating Scheme audit actions relating to officer training.	Blue		Contractor validation records evidence rating consistency measures in place.	Completed.
RECOMMENDATION	STATUS	OUTSTANDING	PROGRESS TO DATE	

Food Hygiene Rating Scheme audit actions relating to procedures.	Blue		Procedures relating to FHRS have been amended.	Completed.
Food Hygiene Rating Scheme audit actions relating to enforcement actions.	Blue		Inspection reports contained FHRS validity and appeal information.	Completed.
Food Hygiene Rating Scheme audit actions relating to ratings and re-ratings.	Green		Most intervention ratings undertaken appropriately.	Ensure ratings relating to significant risk and confidence in management; including track record, were consistently being undertaken in accordance with requirements.
Food Hygiene Rating Scheme audit actions relating to internal monitoring.	Blue		Internal monitoring covers relevant aspects of FHRS scheme.	Completed.

Summary

Total Recommendations	41
Completed	27
Good Progress	9
Limited Progress	5
No Progress	0
Untested	0
Total Outstanding	14