

## Annex 2

### Action Plan for Blaenau Gwent County Borough Council (Excluding Feed Service\*)

Audit Date: 18 - 22 August 2014

Follow-Up Visit Date: 27<sup>th</sup>- 28<sup>th</sup> September 2023

(\*) Actions arising from the audit in relation to animal feedingstuffs have not been included. A new regional feed delivery model was introduced in Wales from April 2015.

#### Status Key

Blue	Completed
Green	Good Progress
Amber	Limited Progress
Red	No Progress

<b>To address (Recommendation including standard paragraph)</b>	<b>Status</b>	<b>Planned improvements</b>	<b>Progress to date</b>	<b>Outstanding</b>
3.18 (i) Ensure that future Food Law Enforcement Service Plans are developed in accordance with the Service Planning Guidance in the Framework Agreement. In particular, an estimate of the full range of service demands should be provided together with an analysis of the resources required against those available. Plans to address any shortfalls identified and detailed costs should be included. [The Standard – 3.1]	<b>Blue</b>	The Food Law Service Delivery Plan for 2017/18 will be produced in accordance with the Service Planning Guidance going forward and will address the specific areas and comments identified for improvement in the Audit report regarding service resource and demand.		Completed
Any variance in meeting the Service Plan should be addressed by the authority in its subsequent Service Plan. [The Standard - 3.3]	<b>Blue</b>			Completed

<b>To address (Recommendation including standard paragraph)</b>	<b>Status</b>	<b>Planned improvements</b>	<b>Progress to date</b>	<b>Outstanding</b>
4.7 (i) Ensure 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]	Blue	<b>Food Hygiene / Food Standards:</b> The annual review of the policies / procedures relevant to the food law service has been built in as a rolling action within the Food Law Service Delivery Plan. Policies/procedures will be updated between the annual reviews where necessary. As a result of the collaboration between Blaenau Gwent and Torfaen County Borough Council's Public Protection Service a review of all policies / procedures is planned for 2017/18 to produce a single combined version of each document wherever reasonably practicable.		Completed
5.12 (i) Review, amend and implement its scheme of delegation and authorisation procedures to ensure that officers are appropriately authorised under all the relevant statutes in accordance with the scheme, and that authorisations are based on an assessment of competence in accordance with the relevant Codes of Practice and centrally issued guidance. [The Standard – 5.1]	Blue	The scheme of delegation through the Council's constitutional provisions was amended in August 2016. The power to authorise all individual officers now rests with the Director of Environment and Regeneration. As each new authorisation is put to the Director for approval going forward the competency assessment to inform the level of authorisation will be provided alongside the request for authorisation.		Completed

<b>To address (Recommendation including standard paragraph)</b>	<b>Status</b>	<b>Planned improvements</b>	<b>Progress to date</b>	<b>Outstanding</b>
5.12 (iii) Review and where necessary amend officer authorisations to ensure the level of authorisation is specified and consistent with their qualifications, training, experience and the relevant Code of Practice. [The Standard – 5.3]	Blue	<b>Food Hygiene / Food Standards:</b> Officer authorisations and the process of authorisation have been revised in order to take account of the issues identified during the audit. The review has included the requirement to provide the competency assessment with the authorisation request for any future authorisations.		Completed
7.20 (i) Carry out 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]	Blue	<b>Food Hygiene:</b> It is noted that of 10 food hygiene related premises selected for audit only 1 was identified by the auditors as potentially requiring an alternative score in respect of confidence in management / control procedures. All officers have participated in food hygiene rating scheme consistency training since the audit and scoring was found to be consistent between officers during the exercise. Scoring consistency will continue to be assessed through internal monitoring arrangements and during any interactive consistency training exercises. With regards to the arrangements for red flagging additional guidance was developed in conjunction with the FSA regarding the process of red		Completed

		flagging and this guidance has been disseminated to all officers (the same issue is also addressed in respect of point 7.2(iii) below).		
<b>To address (Recommendation including standard paragraph)</b>	<b>Status</b>	<b>Planned improvements</b>	<b>Progress to date</b>	<b>Outstanding</b>
7.20 (ii) 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]	Blue	<b>Food Hygiene:</b> Officers received a post audit de-brief highlighting the key issues identified during the audit. It is the intention to repeat this exercise using the learning from both the Blaenau Gwent and Torfaen audit's as a refresher training exercise for staff in both Councils. Ongoing compliance with the requirements will be assessed through internal monitoring.		Completed
7.20 (iii) Amend its documented procedures to set-out its approach to partial inspections and further develop the arrangements for red-flagging. [The Standard – 7.4]	Blue	<b>Food Hygiene:</b> Partial inspections are no longer permitted and compliance with this is assessed through internal monitoring. Additional guidance was developed in conjunction with the FSA regarding the recording of CCP's and the process of red flagging and this guidance has been disseminated to all officers.		

To address (Recommendation including standard paragraph)	Status	Planned improvements	Progress to date	Outstanding
Food Hygiene Rating Scheme audit actions relating to procedures	Blue			Completed
7.20 (iv) Ensure that observations made in the course of an inspection are recorded in a timely manner to prevent loss of relevant information. [The Standard – 7.5]	Blue	<p><b>Food Hygiene:</b> Officers received a post audit de-brief highlighting the key issues identified during the audit which included the need to record issue of compliance as well as non-compliance. It is the intention to repeat this exercise using the learning from both the Blaenau Gwent and Torfaen audit’s as a refresher training exercise for staff in both Councils. Ongoing compliance with the requirements will be assessed through internal monitoring.</p>		Completed
7.35 (i) Carry out food standards inspections of new businesses in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard -7.2]	Blue	<p><b>Food Standards:</b> The Authority operates a risk based inspection programme which identifies inspection frequencies for premises that is in compliance with the Food Law Code of Practice, every effort is and will continue to be made to ensure that programmed interventions are delivered in accordance with this . All new businesses are being visited before a risk rating is applied.</p>		Completed

<b>To address (Recommendation including standard paragraph)</b>	<b>Status</b>	<b>Planned improvements</b>	<b>Progress to date</b>	<b>Outstanding</b>
7.35 (ii) Assess the compliance of establishments in its area to legally prescribed standards; and take appropriate action on any non-compliance found, in accordance with the authority's Enforcement Policy. [The Standard -7.3]	Blue	Officers received a post audit debrief highlighting the key issues raised during the audit which included ensuring that the post inspection forms or other records captured sufficient data to justify the risk applied to the business and that appropriate action is taken on non-compliances. It is the intention to repeat this exercise using the learning from both the Blaenau Gwent and Torfaen audit's as a refresher training exercise for staff in both Councils. Ongoing compliance with the requirements will be assessed through internal monitoring.		Completed
7.35 (iii) Ensure observations made in the course of an inspection are recorded in a timely manner to prevent loss of relevant information. [The Standard – 7.5]	Blue	Officers received a post audit debrief highlighting the key issues raised during the audit which included ensuring observations made during an inspection are recorded in a timely manner. It is the intention to repeat this exercise using the learning from both the Blaenau Gwent and Torfaen audit's as a refresher training exercise for staff in both Councils. Ongoing compliance with the requirements will be assessed through internal monitoring.		Completed

<b>To address (Recommendation including standard paragraph)</b>	<b>Status</b>	<b>Planned improvements</b>	<b>Progress to date</b>	<b>Outstanding</b>
8.9 (i) Ensure the target response times specified in complaint procedures are met and that the outcome of food standards complaint investigations is communicated to complainants. [The Standard – 8.2]	Blue	Officers received a post audit de-brief highlighting the key issues identified during the audit which included the need to ensure adherence to the internal food standards complaints procedure and of the need to document communications to complainants. It is the intention to repeat this exercise using the learning from both the Blaenau Gwent and Torfaen audit's as a refresher training exercise for staff in both Councils. Ongoing compliance with the requirements will be assessed through internal monitoring.		Completed
12.10 (i) Amend its sampling policy to include details of its approach to formal sampling of food and set-up food standards sampling programmes that accord with the appropriate Codes of Practice and relevant guidance. [The Standard – 12.4]	Blue	<p><b>Food Hygiene / Food Standards:</b> The 2017/18 Food Law Service Delivery Plan and future plans will include a statement in respect of the Council's approach to formal sampling.</p> <p><b>Food Standards:</b> A sampling programme for food standards was in existence at the time of the audit. A sampling programme has been produced for each subsequent financial year.</p>		Completed



<b>To address (Recommendation including standard paragraph)</b>	<b>Status</b>	<b>Planned improvements</b>	<b>Progress to date</b>	<b>Outstanding</b>
12.10 (ii) Review, amend and fully implement its Food Sampling procedures in accordance the Codes of Practice and centrally issued guidance. [The Standard – 12.5]	Blue	As a result of the collaboration between Blaenau Gwent and Torfaen County Borough Council’s Public Protection Service a review of all policies / procedures is planned for 2017/18 to produce a single combined version of each document wherever reasonably practicable. This review will include a revision of the food hygiene procedure relating to sampling and will address any areas of improvement identified during the audit.		Completed
13.9 (i) Ensure that its procedure for the investigation of food related infectious disease notifications is fully implemented in all cases. [The Standard -13.2]	Blue	<b>Food Hygiene:</b> A new procedure had been developed prior to the audit as a result of the Council’s own identification of improvements needed to the method of ensuring timely allocation of cases to officers and the standardisation of the minimum requirements in terms of case contact. The cases identified in the audit where improvement was required pre-dated the implementation of this revised procedure. The revised procedure continues to be implemented.		Completed

<b>To address (Recommendation including standard paragraph)</b>	<b>Status</b>	<b>Planned improvements</b>	<b>Progress to date</b>	<b>Outstanding</b>
<p>15.10 (i) Set-up, maintain and implement a documented Enforcement Policy, in accordance with the relevant Codes of Practice and other official guidance, and ensure that the policy is appropriately approved. The Enforcement Policy or an accurate summary should be readily available to the public and food businesses in its area. [The Standard – 15.1]</p>	<p><b>Green</b></p>	<p>A documented enforcement policy was in place for Environmental Health (including food hygiene) and had been appropriately approved by Executive, a point which was demonstrated at the time of the audit. Whilst there was an enforcement policy in place for Trading Standards (including Food Standards) which had been formally adopted it had been recognised that it had been sometime since this policy had been reviewed and during September 2013 when the two services came together under Public Protection it was agreed that food standards would informally adopt the Environmental Health policy. As a result of the collaboration with Torfaen County Borough Council the enforcement policy has been reviewed with a view to bringing in a single enforcement policy, the draft of which has been submitted through the Corporate Management Team and is now going through the process of formal approval. The new enforcement policy will include criteria for the use of all enforcement options and the arrangements</p>	<p>Policy approved and publicly available and amended to include criteria for some enforcement actions, references to LA operated premises and Primary Authority scheme.</p>	<p>Amend the policy to include criteria for the use of formal notices.</p>

		for ensuring compliance in establishments where the authority is the food business operator.		
<b>To address (Recommendation including standard paragraph)</b>	<b>Status</b>	<b>Planned improvements</b>	<b>Progress to date</b>	<b>Outstanding</b>
15.10 (ii) Set-up, maintain and implement documented procedures for all available enforcement actions in accordance with the relevant Codes of Practice and centrally issued guidance. [The Standard – 15.2]	Blue	<b>Food Hygiene / Food Standards:</b> As a result of the collaboration between Blaenau Gwent and Torfaen County Borough Council’s Public Protection Service a review of all policies / procedures is planned for 2017/18 to produce a single combined version of each document, this will include procedures relating to enforcement action.		Completed
15.10 (iii) Ensure that it is able to demonstrate that Simple Cautions relating to food standards offences are administered in accordance with the Food Law Code of Practice and official guidance. [The Standard – 15.3]	Blue	Officers received a post audit de-brief highlighting the key issues identified during the audit which included the need to ensure simple cautions are recorded correctly. Ongoing compliance with the requirements will be assessed through internal monitoring.		Completed
15.10 (iv) Ensure that it is able to demonstrate that decisions on enforcement actions in respect of food standards offences are made following consideration of its Enforcement Policy. [The Standard – 15.4]	Blue	Officers received a post audit de-brief highlighting the key issues identified during the audit which included the need to complete a checklist which demonstrates that the internal enforcement policy had been considered. Ongoing compliance with		Completed

		the requirements will be assessed through internal monitoring.		
<b>To address (Recommendation including standard paragraph)</b>	<b>Status</b>	<b>Planned improvements</b>	<b>Progress to date</b>	<b>Outstanding</b>
Food Hygiene Rating Scheme audit actions relating to report letters & safeguards	Blue			Completed.
16.9 (i) Ensure that Food Standards Inspection Report forms provided to businesses following interventions / inspections contain all of the information required by the Food Law Code of Practice. [The Standard -16.1]	Blue	Officers received a post audit debrief highlighting the key issues raised during the audit which included ensuring that the post inspection forms left with the business were completed in full. Ongoing compliance with the requirements will be assessed through internal monitoring.		Completed
19.11 (i) Fully implement its documented internal monitoring procedure for food hygiene. [The Standard – 19.1]	Blue	<b>Food Hygiene:</b> There has been a further revision to the internal monitoring procedure and work continues to implement this in full. The Authority is involved in the ongoing development of an internal monitoring toolkit with the FSA and Food Safety Expert Panel and the internal monitoring arrangements will be further reviewed as a result of this work. As part of the collaborative working arrangements a single internal monitoring procedure will be		Completed

		produced between Blaenau Gwent and Torfaen.		
<b>To address (Recommendation including standard paragraph)</b>	<b>Status</b>	<b>Planned improvements</b>	<b>Progress to date</b>	<b>Outstanding</b>
19.11 (ii) Further develop, maintain and implement its documented internal monitoring procedure for food standards so as to enable it to verify its conformance with the Standard, relevant legislation, Codes of Practice, centrally issued guidance and its own documented policies and procedures. [The Standard – 19.1 and 19.2]	Blue	<b>Food Standards:</b> The internal monitoring procedure commenced full implementation post audit and internal monitoring activities are ongoing. It has been recognised that internal monitoring covered interventions and complaints but sampling actions were not fully covered. This will be addressed when a single procedure is produced following the collaboration between Blaenau Gwent and Torfaen County Borough Council Public Protection Services.		Completed
19.11 (iii) Ensure internal monitoring records are kept for at least 2 years.	Blue	<b>Food Hygiene / Food Standards:</b> Records of internal monitoring activities are now being kept for a minimum period of 2 years.		Completed

### Summary

<b>Total recommendations</b>	<b>26</b>
<b>Completed</b>	<b>25</b>
<b>Good progress</b>	<b>1</b>
<b>Limited progress</b>	<b>0</b>
<b>No action</b>	<b>0</b>

<b>Total outstanding</b>	<b>1</b>
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