

Action Plan for Wrexham County Borough Council (Excluding Feed Service*)**Audit Date: 6th – 10th February 2017****Follow-Up Visit Date: 4th-5th September 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
3.24 (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]		The food service plan has now been written in accordance with Service Planning Guidance. The estimated of the number of resources has be incorporated into the Food Service Plan.	The 2018/19 Service Plan has been drafted to include an estimate of the resources required to deliver services against those available.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
3.24 (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 – 3.1]		Annual performance review has been included in the plan and a review of targets has been carried out.	The 2018/19 Service Plan includes all information on the previous year's performance against the service plan and any specified performance targets, standards and outcomes.	Completed.
3.24 (iii) Ensure all variances in meeting the food service plan is addressed in its subsequent plan. [The Standard – 3.3]		All variances from the previous plan have been addressed in the plan. This has included providing an explanation for each one and identifying areas of improvement.	The 2018/19 Service Plan has been drafted to address all variances in meeting the previous years' Service Plan.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
4.6 (i) Ensure that the policies and procedures are updated with current information and references and are reviewed at regular intervals in accordance with document control procedures. [The Standard – 4.1 & 4.2]		All procedures which are yet to be updated will be updated and reviewed as part as a rolling programme.	Procedures have been reviewed and updated and a system for document control has been introduced to ensure documents are reviewed at regular intervals.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	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. [The Standard – 5.3]		<p>The resource assessment in the service plan has been brought to the attention of the appointed Lead Member and is awaiting his approval.</p> <p>Officers are also being re-trained to carry out combined Food Hygiene and Food Standards Inspections.</p> <p>Revised procedures</p>	<p>Following a restructure, the team has been merged which has provided extra capacity in terms of authorised officers.</p> <p>The Authority has invested in training to enable authorised officers to carry out combined food hygiene and food standards inspections which has resulted in a resource saving.</p> <p>The resource assessment in the service plan indicates an increase in full-time equivalent (FTE) professional officers compared to the time of the full audit.</p>	<p>The resource assessment in the Service Plan indicates a variance between the actual number of full-time equivalent (FTE) professional officers in post when compared to the estimate of numbers of FTE's required.</p> <p>There is a shortfall in 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>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.29 (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]		Service planning will identify the programme of interventions in accordance with the Food Law Code of Practice and the resources required to achieve it. The resource assessment in the service plan has been brought to the attention of the appointed Lead Member and is awaiting his approval. Revised procedures, new working practices and new management arrangements are being implemented.	<p>The total number of overdue food hygiene interventions has reduced.</p> <p>The authority is demonstrating a risk-based approach to its intervention programme.</p>	Ensure all establishments including low-risk establishments receive an appropriate intervention at the correct frequency.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.29 (ii) Carry out food hygiene interventions / inspections 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 revisits are undertaken consistently in accordance with the Food Law Code of Practice, centrally issued guidance, and local procedures. [The Standard – 7.2]		Officers have been advised to ensure that risk ratings have been applied correctly and that revisits have been carried out and recorded appropriately.	<p>The intervention risk rating and revisits were undertaken in accordance with the Food Law code of Practice in all cases.</p> <p>The process of approval was correct in all relevant cases.</p>	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.29 (iii) Fully assess the compliance of establishments in its area to the legally prescribed standards. [The Standard – 7.3]		<p>Inspection reports have been revised & and updated to reflect auditors comments during the week.</p> <p>Officers have been reminded to ensure that assessments of compliance are consistently thorough and recorded appropriately.</p>	<p>Improvements were noted in the consistency of Hazard Analysis Critical Control Point (HACCP) assessments in approved establishments and in assessments of the application of identification marks.</p> <p>Improvements in relation to traceability assessment, cross contamination assessments, food hygiene training assessment and discussions with food handlers.</p>	Ensure consistent assessments of health / identification marks for incoming foods. Ensure full assessments are consistently undertaken at all Critical Control Points (CCPs) and for incoming imported foods (non-approved premises).

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>7.29 (iv) Ensure that the documented procedures for interventions are reviewed to include reference to the local arrangements for red flagging, timescales for revisits and home/originating authority liaison arrangements. Additionally, develop an intervention procedure in accordance with the food law code or practice and centrally issued guidance for the approval of establishments and for its alternative enforcement strategy. [The Standard – 7.4]</p>		<p>New joint intervention procedure to be introduced.</p> <p>Procedure will include the need for red flagging, re-visits and notification of intervention outcome to Home/Originating/Primary Authority.</p> <p>New Approval Intervention procedure to be developed.</p> <p>New Alternative Enforcement Strategy procedure to be developed for food hygiene & standards Inspections</p>	<p>Procedures now cover local arrangements for red flagging, alternative enforcement strategy (AES), timescales for revisits and home/originating authority liaison arrangements</p> <p>A procedure has been developed in relation to interventions in approved establishments.</p>	<p>Completed.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.29 (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>Inspection reports have been revised & and updated to reflect auditors comments during the week. Inspection Reports now include recording of ID numbers & Cross contamination controls</p> <p>Officers have been reminded to ensure that observations are appropriately recorded.</p>	<p>Improvements were noted in relation to the recording of traceability assessments, cross contamination assessments, food hygiene training assessments and discussions with food handlers.</p> <p>Improvements were noted in recorded observations in relation to suppliers, customers and compliance assessments in approved establishments.</p>	Ensure that observations are consistently recorded in relation to assessments at CCPs, checks on incoming health / ID marks and imported foods (non-approved premises)

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.48 (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]		<p>Service planning will identify the programme of interventions in accordance with the Food Law Code of Practice and the resources required to achieve it. The resource assessment in the service plan has been brought to the attention of the appointed Lead Member and is awaiting his approval.</p> <p>Revised procedures, new working practices and New management arrangements are being implemented.</p>	<p>The total number of overdue food standards interventions has reduced.</p> <p>The authority has included businesses that were previously listed as outside of the scope of the programme into its programme of food standards inspections.</p>	Ensure all establishments including medium-risk establishments and unrated establishments (including those that have been brought into the scope of the programme) receive an appropriate intervention at the correct frequency.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.48 (ii) Carry out food standards interventions/inspections in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.2]		Officers have been advised to ensure that risk ratings have been applied correctly and that inspections are carried out unannounced in accordance with the Code.	Inspections consistently unannounced and some improvements in consistency of risk rating in accordance with findings.	Ensure all risk ratings are consistent with findings.
7.48 (iii) Assess the compliance of establishments in its area to the legally prescribed standards [The Standard – 7.3]		Officers carrying out Food Standards Inspections have been advised that they must capture and record sufficient information to be able to fully assess compliance of the premises.	Improvements were noted in compliance assessments.	Completed.
7.48 (iv) Develop an intervention procedure in accordance with the food law code or practice and centrally issued guidance. [The Standard – 7.4].		New joint intervention procedure has been introduced.	A procedure has been developed and combined with the food hygiene procedure.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
7.48 (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]		New combined inspection proforma has been developed. Additional requirements and recommendations that were highlighted as part of the audit have been included. The form has now been designed for use with combined Food Hygiene & Standards Inspections.	Improvements were noted in officers' observations; in particular, in relation to size, scale and scope of business activities and assessments of compliance.	Completed.
8.8 (i) Amend its food hygiene procedure to include local arrangements for dealing with complaints regarding the condition of premises and time frames for responding to complaints. Additionally, the authority should create and implement a food standards procedure in accordance with the Food Law Code of Practice and other centrally issued guidance. [The Standard – 8.1]		New joint food hygiene & food standards complaint procedure to be introduced.	The food hygiene procedure has been amended and now includes a procedure for food standards.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
8.8 (ii) Ensure that food standards complaints or service requests are investigated in accordance with the relevant Code of Practices, centrally issued guidance and the Authority's policies and procedures. [The Standard – 8.2]		Officers have been advised that service users must be notified of the outcome of all investigations.	Complainants are now being consistently notified of the outcome of investigations.	Completed
11.3 (i) Review and update its database management procedure. [The Standard – 11.2]		Management of database procedure has been updated and includes changes to the database being used and new working procedures.	The database management procedure has been amended.	Completed.
12.11 (i) Review, 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. [The Standard – 12.4]		Sampling policy has been reviewed and updated taking into account necessary changes. A combined food standards and food hygiene sampling procedure has been developed.	The sampling policy / procedure has been amended.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
12.11 (ii) Review, amend and implement its documented procedure 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]		Sampling procedure has been reviewed and updated taking into account necessary changes. A combined food standards and food hygiene sampling procedure has been developed.	The sampling procedure has been amended and combined with the sampling policy.	Completed.
12.11 (iii) Carry out food hygiene and food standards sampling in accordance with its documented sampling policy, procedures and programme. [The Standard – 12.6]		Food Hygiene & Standards sampling to be carried out in accordance with the sampling policy, procedures and 2017/18 sampling schedule.	Improvements were noted in follow-up of food hygiene samples. Food standards follow-up action was untested due to limited availability of adverse sample results.	Ensure that appropriate action is taken in relation to adverse food standards sample results; including notification of results to all relevant parties.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
13.9 (i) Review 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]		<p>Infectious disease procedure to be updated and needs to take into account the new Infectious Disease Notification procedure. New infectious disease database goes live Mid May so this work cannot be completed before this time.</p> <p>Procedure has been put in place to ensure that all Campylobacter cases receive a follow up questionnaire if there is a non - response to the initial questionnaire. This will be incorporated into the above procedure.</p>	The communicable disease procedure has been amended and was being implemented in all cases.	Completed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
15.19 (i) Review and amend its enforcement policies 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 the food safety enforcement policy is approved by the appropriate member forum. [The Standard – 15.1]		Food Enforcement Policy has been updated to include what action is taken in premises where the LA is the Food Business Operator and has been approved by the Public Protection Service Manager.	The enforcement policy has been updated to include arrangements for local authority operated premises.	Ensure the enforcement policy includes criteria for each of the food enforcement options. This may be done by adding criteria contained in the food enforcement procedure as an appendix to the public protection policy.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>15.19 (ii) Review, amend and implement its Hygiene Improvement Notices, Remedial Action Notices, Hygiene Emergency Prohibition Notices and Voluntary Closures, simple cautions and prosecutions to include details of local arrangements; in particular, the method and record of service, the use of approved templates, checks on compliance, arrangements for bringing unsafe food or prohibition decisions before a Court of Law, and the process of compiling and approving files for decisions on prosecution / simple cautions. [The Standard – 15.2]</p>		<p>Various procedures relating to notices will be updated to incorporate audit recommendations.</p>	<p>Procedures for Hygiene Improvement Notices, Remedial Action Notices, Seizure, Detention and Voluntary Surrender and Hygiene Emergency Prohibition Notices and Voluntary Closures amended. Prosecution approval checklist amended to include reference to enforcement policy criteria.</p>	<p>Amend the procedure in relation to simple cautions and prosecutions to include the process for compiling case files and approving decisions.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>15.19 (iii) Set up documented enforcement procedures for follow up and enforcement actions in relation to Improvement Notices, approved establishments and imported food in accordance with the Food Law Code of Practice and official guidance. [The Standard – 15.2]</p>		<p>Procedure which covers the notices in approved premises and imported food control are to be developed.</p> <p>Procedure for follow up actions and enforcement action in relation to Improvement Notices will be covered by a procedure in paragraph 15.19 (ii)</p>	<p>Procedures set up for enforcement in relation to food standards improvement notices, approved establishments and imported food.</p>	<p>Completed.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
15.19 (iv) Ensure that food hygiene and food standards enforcement including RANs, destruction of food, prosecutions and Simple Cautions are carried out in accordance with the Food Law Code of Practice, centrally issued and official guidance and local procedures. [The Standard – 15.2 & 15.3]		<p>RANS – Officers have been advised that where a RAN is served 1 offence per RAN and correct legislation to be specified.</p> <p>Where there is a delay for any reason in the destruction of food then these reasons should be recorded appropriately. Also, the date / time of destruction will be specified on the relevant receipt documentation. Copies of simple cautions must be attached to prosecution files. In addition, all case files will include witness statements and appropriate disclosure information.</p>	<p>Improvement in relation to Remedial Action Notices.</p> <p>Seizures, simple cautions and prosecutions remain untested as none had taken place in the relevant time period for this follow up audit.</p>	<p>Ensure the destruction of seized food, simple cautions and prosecutions are carried out in accordance with the relevant requirements.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>15.19 (v) Ensure all decisions on enforcement action are made following consideration of the authority's enforcement policy and are documented accordingly. [The Standard – 15.4]</p>	OPEN	<p>Officers have been advised of the need to ensure that all actions are adequately documented and stored accordingly.</p> <p>Evidential test now includes consideration of Public Protection Enforcement Policy</p>	Remains untested as no prosecutions or simple cautions had taken place in the relevant time period for this follow up audit.	

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	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; including provision of reports of intervention to a business' head office. These records shall include food establishment registration forms. The authority should also record, with reasons, any deviations from set procedure. [The Standard – 16.1]</p>		<p>Officers have been advised of the need to document where correspondence has been sent to head office.</p> <p>Due to a new data base being introduced, as premises are visited new food registration forms are being completed. This will be an on going process until the database is fully populated.</p> <p>Approved establishment files will be reviewed to ensure all required information is present. Deviations from set procedures will be recorded on establishment files.</p>	<p>Registration forms were available in all cases.</p> <p>Some improvement in relation to availability of file information for approved establishment files including withdrawal / recall plans, supplier information, labels bearing identification marks.</p>	<p>Ensure that reports of interventions are consistently sent to a business' head office.</p> <p>Ensure that the core elements of a business's HACCP are consistently retained including where the temperature of incoming foods and storage of chilled foods are identified as CCPs.</p> <p>Ensure product lists, products work flows, water distribution plans, drainage plans and pest controls plans are consistently available on approved establishments files, along with results for raw material, product and water tests as well as local authority sample results.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
16.12 (i) Ensure that food standards intervention reports provided following interventions / inspections contain all of the information required by Annex 6 of the Food Law Code of Practice. [The Standard – 16.1]		Food Standards intervention reports have been reviewed to ensure that they meet the requirements of Annex 6. Joint Food Hygiene / Standards form has now been introduced.	Reports now include a clear distinction between legal requirements and recommendations. Some improvements in reporting actions to be taken by the business and documents examined.	Ensure reports include contact details for the senior officer, and timescales for compliance. Ensure reports consistently include actions to be taken by the business and documents examined.
19.10 (i) Revise its documented internal monitoring procedures for food hygiene to include officer authorisations, approved establishments, food hygiene AES and food standards activities. Fully implement the revised procedure. [The Standard – 19.1]		Internal Monitoring Procedure has been revised to incorporate, Officer Authorisations, Approved Premises Establishments, Food Hygiene & Food Standards AES and Food Standards activities	The documented internal monitoring procedure has been reviewed to include officer authorisations, approved establishments, food hygiene alternative enforcement strategy (AES) and food standards activities.	Ensure that internal monitoring is being fully implemented in accordance with the internal monitoring procedure.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
19.10 (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]		Internal Monitoring Procedure has been revised to incorporate, Officer Authorisations, Approved Premises Establishments, Food Hygiene & Food Standards AES and Food Standards activities	The scope of the internal monitoring system incorporates all activities and elements.	Completed.

Summary.

Total Recommendations	31
Completed	17
Good Progress	11
Limited Progress	2
No action	0
Untested	1
Total Outstanding	14