

## Updated Action Plan for Horsham District Council

Audit date: 18 - 20 June 2013

Action Plan updated: 2 April 2014

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.1.5(i) Ensure that future Food Service Plans are in full accordance with the Service Planning Guidance in the Framework Agreement and provide an accurate and reasoned estimate of the staffing resources required to deliver the food law enforcement service compared with the staffing resources available to the Authority. [The Standard – 3.1]	30/04/14	The Service Plan for 2014/15 will include a breakdown of resources required to deliver the food service. A detailed comparison will be made of the resources required to deliver the service in full in accordance with statutory requirements against the resources currently available to identify any potential shortfall.	Ongoing	Work in progress.  Assessment underway to determine current staffing resources against the statutory requirements to deliver the service in full to identify potential shortfall. The results of our assessment will detail the parts of the service we may potentially be unable to deliver.
3.1.5(ii) Carry out a performance review at least once a year based on the service delivery plan, documented and submitted to either the relevant Member forum or, where approval and management of plans has been delegated to senior officers, to the relevant senior officer. [The Standard –3.2]	30/04/14	The Service Plan for 2014/15 will include a performance review using performance indicators, results of any audits and outcomes of the routine food hygiene inspection monitoring.  Revisions to the Service Plan will be incorporated into the Plan for 2014/15 subject to elected member approval.	On-going as end of year statistics required to include in Service Plan (SP).	Sussex Liaison Group projects for 2014/15 agreed for inclusion in SP.  Preliminary figures for inspections due in 2014/15 compiled for inclusion in SP.  Committee Report to relevant Member for approval being undertaken.

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3.1.7 Ensure that all documented policies and procedures for each of the enforcement activities are reviewed at regular intervals and whenever there are changes to legislation and centrally issued guidance. [The Standard – 4.1]	31/12/13	A full review and revision of documented food service policies and procedures. Item to be added to Commercial Team Agenda to review changes in legislation or centrally issued guidance. Revision of documented procedures as required following review process.	Completed	(1) Standing item on the agenda now included at Commercial Team meetings  Full revision will be undertaken to relevant procedures if there are any significant changes in legislation, centrally issued guidance, council policy, staffing levels, etc
3.1.12(i) Develop and implement an authorisation procedure including a suitable method of assessing and reviewing officer competencies and associated training requirements commensurate with their responsibilities and duties. [The Standard – 5.1]	31/12/13	Combined with 3.1.7 to develop a documented authorisation procedure. The procedure will include methods for assessing competencies with a training needs analysis commensurate with responsibilities. To develop a competency framework for newly qualified officers with professional development to work towards authorisation of full statutory powers/duties set out in the Food Law CoP.	Completed	(2) Revised Food Safety Operational Procedure for the Authorisation of Food Safety Officers.
3.1.12(ii) Ensure that officers receive appropriate update training to maintain the competencies necessary to deliver the technical aspects of the work in which they are involved. [The Standard – 5.4]	31/12/13	Combined with 3.1.12(ii) above. Procedure to periodically evaluate competencies with training needs analysis. Annual employee appraisals to assess continuous professional development in accordance with Food Law CoP.	Ongoing	One to one staff appraisals for 2014/15 to be completed by end of May 2014 where competencies will be discussed and evaluated.  Training budget agreed for 2014/15.

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<p>3.3.6 Ensure that food hygiene interventions at food premises in their area are carried out at a frequency which is not less than that determined under the intervention rating scheme set out in the Food Law Code of Practice. [The Standard – 7.1]</p>	31/12/13	<p>Implementation of internal monitoring procedures to include allocation of programmed inspections to Officers well ahead of 'inspection due' date. Make full use of intervention options made available in accordance with Food Law CoP. Regular review of premises data base to check progress of inspections due.</p>	Completed	<p>(3) Revised Food Safety Operational Procedure for the Monitoring the Quality of Food Hygiene Inspections</p> <p>Alternative intervention strategy to be introduced for 2014/15 for low risk premises (30 or less).</p> <p>Programmed inspections requiring physical inspection allocated to Officers one month in advance at monthly Commercial Team meetings.</p> <p>All programmed inspections are monitored by Principal EHO and recorded on excel sheet. All discrepancies discussed with relevant officer.</p>
<p>3.3.15(i) Carry out interventions and inspections and approve establishments in accordance with appropriate legislation and centrally issued guidance. [The Standard – 7.2 and 7.3]</p>	31/12/13	<p>A full review and revision of documented food service policies and procedures. Implementation of internal monitoring procedures. Procedures to ensure that Officers are competent and qualified to inspected premises commensurate with responsibilities. Ensure that correct inspection forms are used and inspections are undertaken in accordance with relevant legislation FLSCoP, etc.</p>	Completed	<p>Approved Establishment training undertaken by Officers.</p> <p>(2) Revised Procedure for the Authorisation of Food Safety Officers.</p> <p>(5) Revised Food Premises Procedure for Inspections under Regulation 852 and 853.</p> <p>Inspections monitored to ensure correct forms are used</p>

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				and in accordance with FLCoP.
3.3.15(ii) Assess the compliance of establishments and systems in their area to the legally prescribed standards. In addition the Authority shall take appropriate and timely action on any non-compliance found in accordance with the Authority's enforcement policy, the Food Law Code of Practice and centrally issued guidance. The reasons for any departure from its enforcement policy should be documented. [The Standard - 7.3 and 15.4]	31/12/13	A full review and revision of documented Enforcement Policy to include the most appropriate course of action. To include circumstances where it may be appropriate to depart from Enforcement Policy and to ensure that the information is recorded should such circumstances occur.	Completed but under review	(4) Food Service Enforcement Policy was revised in December but it is to be reviewed in light of Regulators Code.
3.3.15(iii) Further develop and implement its documented procedures for the inspection of general food premises and approved establishments to provide operational guidance to officers that is in line with the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.4]	31/12/13	A full review and revision of documented procedures for inspections of the full range of premises under 852 and 853 in accordance with Food Law CoP and centrally issued guidance. The procedures are to include operational guidance with regards to current guidance, specific inspection forms, gathering of information, evidence, etc.	Completed	(5) Revised documented food safety operational procedure for Food Premises Inspections under Regulation 852 and 853.
3.4.5(i) Set up maintain and implement documented procedures for follow up and enforcement actions in accordance with the relevant Codes of Practice and official guidance. [The Standard - 15.2]	31/12/13	A full review and revision of documented procedures for follow up enforcement actions. The process to include graduated approach to seeking compliance in accordance with Food Law CoP and centrally issued guidance.	Completed	Revised documented procedures.

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3.4.5(ii) Carry out food law enforcement in accordance with the relevant Codes of Practice and centrally issued guidance. [The Standard – 15.3]	31/12/13	A full review and revision of documented Enforcement Policy to include the most appropriate course of action, full range of enforcement actions, procedures for voluntary closures, etc in accordance with Food Law CoP and centrally issued guidance.	Completed but under review	(4) Food Service Enforcement Policy was revised in December but it is to be reviewed in light of Regulators Code.
3.5.4(i) Develop, maintain and implement documented internal monitoring procedures in accordance with Article 8 of Regulation (EC) No. 882/2004 (Official Feed and Food Controls), the Food Law Code of Practice and centrally issued guidance. This should include all aspects of the Service, including the work of contractors where appropriate. [The Standard – 19.1]	31/12/13	A full review and revision of documented procedures for internal monitoring of inspections, complaints, sampling, etc.  The procedure will cover internal monitoring of full time officers and contractors.	Completed	(3) Revised Food Safety Operational Procedure for the Monitoring the Quality of Food Hygiene Inspections.
3.5.4(ii) Verify its conformance with the Standard, relevant legislation, the Food Law Code of Practice, centrally issued guidance and the Authority's own documented policies and procedure across all the Authority's food law enforcement activities. [The Standard – 19.2]	31/12/13	Undertake a performance review using performance indicators, results of any food service audits and outcomes of internal monitoring across all food law enforcement activities. Act upon any non-conformances.	Ongoing	Assessment currently underway to analyse annual performance against set performance indicators to identify any potential non-conformances. A review performance and consider most appropriate course of action any non-conformance to be undertaken.
3.5.4(iii) Ensure that records of monitoring activities are maintained. [The Standard – 19.3]	31/12/13	A full review and revision of documented procedures for internal monitoring of inspections, complaints, sampling, etc.	Completed	(6) Inspections monitored and recorded on excel sheet.

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3.5.7 Take appropriate action on all complaints received in accordance with its Enforcement Policy and relevant centrally issued guidance. The reasons for any departure from its Enforcement Policy should be documented. [The Standard - 8.3 and 15.4]	31/12/13	A full review and revision of documented Enforcement Policy and complaint procedures. To include circumstances where it may be appropriate to depart from Enforcement Policy and to ensure that the information is recorded should such circumstances occur.	Completed	(7) Revised Food Safety Operational Procedure for Food Complaint Investigations.
3.5.10(i) Develop, maintain and implement an appropriate documented sampling procedure, providing operational guidance for officers including reference to all possible follow-up actions and the Authority's enforcement procedure. [The Standard - 12.3]	31/12/13	A full review and revision of documented food sampling procedures.  The procedures are to include operational guidance with regards to obtaining samples, interpretation of results, follow-up actions etc.	Completed	(8) Revised Food Safety Operational Procedure for Food Sampling.
3.5.10(ii) Take appropriate action in accordance with its Enforcement Policy where sample results are not considered satisfactory. [The Standard - 12.7]	31/12/13	A full review and revision of documented Enforcement Policy and food sampling procedures. To give clear and concise instructions for follow up actions and enforcement options for unsatisfactory results.	Completed	(8) Revised Food Safety Operational Procedure for Food Sampling.  (4) Food Service Enforcement Policy was revised in December but it is to be reviewed in light of Regulators Code.

- (1) – Agenda & minutes for Commercial Team Meeting dated 13 February 2014
- (2) – Revised Food Safety Operational Procedure – Authorisation of Food Safety Officers
- (3) – Revised Food Safety Operational Procedure – Monitoring the Quality of Food Hygiene Inspections
- (4) – Revised Food Safety Operational Procedures – Enforcement Policy
- (5) – Revised Food safety Operational Procedures – Food Premises Inspections
- (6) – Excel sheet detailing the internal monitoring of programmed food inspections

- (7) – Revised Food Operational Procedures – Food Complaint Investigations
- (8) – Revised Food Operational Procedures – Food Sampling
- (9) – Email from Cabinet Member confirmation that audit report was brought to her attention