

Updated Action Plan for Liverpool City Council

Audit dates: 25-26 May 2010

Action Plan updated: 20 October 2011 and 30 July 2013

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.1.2 Ensure that future Food Service Plans are fully in line with the Service Planning Guidance in the Framework Agreement, including details of the inspection programme and an estimation 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]	Completed	Review Food Safety Service Plan to include inspection programme and identification of appropriate staffing resource required to deliver the food law enforcement service, compared to the staffing resource available.	Completed	Food Safety Plan reviewed and submitted to Cabinet Member.
3.1.11 Ensure that where variances in meeting the service delivery plan are identified, that appropriate measures are taken to address these variances in subsequent Service Plans. [The Standard – 3.3]	Dependent on sufficient staff resources	Identify variances and appropriate measures necessary to address them. Implement those identified measures.	Completed	Food Safety Plan reviewed and submitted to Cabinet Member.

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.1.14 Fully implement and maintain a document control system for all its food service policies and procedures to ensure that all documents are reviewed at regular intervals and whenever there are changes to legislation and centrally issued guidance, ensuring changes to documents are appropriately authorised. [The Standard – 4.1 and 4.2]	Completed	Produce a document control system for all policies and procedures. All procedures to be dated and authorised.	Completed	Existing procedures dated and authorised. Implemented a rolling programme of procedure reviews. Identified a lead officer for all procedures.
3.1.18 Ensure that where it has specific responsibilities, such as establishment approval in accordance with Regulation No. 853/2004, that officers have the necessary specialist knowledge. [The Standard – 5.2]	31/12/10	Provide specific specialist training for all Environmental Health Officers within the Food Team.	Completed	Identified training and relevant officers provided with appropriate training.
3.1.23 Review its staffing resources to ensure that it has appointed a sufficient number of authorised officers to carry out the work set out in the Food Service Plan. [The Standard – 5.3]	Dependent on increased budget	Identify staff resource necessary and increase establishment within the Food Team to ensure sufficient number of authorised officers to carry out the work set out within the Food Service Plan.	Completed	Identified Staff resource required and submitted to Cabinet Member within the Food Service Plan. Measures have been taken to ensure that the food programme is achieved by increasing the food safety resource by moving health and safety officers onto the food safety unit.

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<p>3.2.5 Ensure that food hygiene inspections of premises in their area are undertaken at a frequency which is not less than that determined under the inspection risk rating system set out in the Food Law Code of Practice or other centrally issued guidance. [The Standard – 7.1]</p>	<p>Dependent on increased staff resource</p>	<p>Identify staff resource necessary and increase establishment within the Food Team to ensure sufficient number of authorised officers to inspect premises at a frequency not less than that determined by the risk rating.</p>	<p>Completed</p>	<p>Inspection programme generated by food premises database. Prioritisation of high risk premises. Alternative enforcement strategy for low risk premises. Monthly monitoring of inspections due and inspections carried out. The most overdue category 'C' inspections to be given priority along with non compliant category C premises and A and B premises.</p>

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<p>3.2.7 Review and further develop its documented procedures for the full range of intervention activities undertaken, particularly in relation to inspections and officers' assessment of HACCP based food safety management systems. [The Standard – 7.4]</p>	<p>31/10/10</p>	<p>Review documented procedures to include further guidance to officers, particularly in relation to the assessment of food safety management systems based on the principles of HACCP.</p>	<p>Completed</p>	<p>Sharing of procedures within the Cheshire and Merseyside Authorities. Implemented a rolling programme of procedure reviews. Identified a lead officer for all procedures.</p> <p>HACCP can now be tracked in individual premises on the food premises database to enable a HACCP trend to be identified within Liverpool CC. Proformas and aides-memoire have been introduced to ensure that HACCP information is captured for the use by officers, future officers and managers. Revised Inspection Record Sheets have been produced in line with the COP to ensure that HACCP information is retrieved during the inspection in a consistent manner.</p>

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<p>3.2.12 Ensure that observations made and/or data obtained in the course of an inspection/intervention is recorded in such a way the records are retrievable. Determination of legal compliance or any non-compliance or deviation from set procedures should be recorded. [The Standard – 7.5 and 16.1]</p>	31/10/10	Develop inspection recording form / aide memoir, that records relevant information and record this on the premises database.	Completed	<p>Shared inspection forms within the Cheshire and Merseyside Authorities. Piloting of Inspection forms. Completed forms scanned and stored in database.</p> <p>Revised Inspection Record Sheets and Proformas are now in place and are scanned to the premises or the job to allow the data to be in an easily retrievable format.</p>

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<p>3.2.14 Carry out and interventions/inspections and approve establishments in accordance with the relevant legislation, Codes of Practice and centrally issued guidance and take appropriate action on any non-compliance found. [The Standard – 7.2 and 7.3]</p>	<p>31/12/10</p>	<p>Provide specific specialist training for all Environmental Health Officers within the Food Team. Develop procedure for monitoring quality of interventions/inspections and approvals.</p>	<p>Completed</p>	<p>Premises with conditional approval now closed.</p> <p>Competency review of all officers has been undertaken and as a matter of urgency for the officers that have moved from Health and Safety on to the Food Safety Unit. Competency Documents have been completed for all staff, and information detailed on a Training Matrix to ensure training is highlighted and scheduled in to the training plan. A number of officers have been identified as requiring further training in approved premises and vacuum packing. This has been highlighted on the training matrix and will be incorporated into the training plan 2012.</p> <p>Any training needs identified have been actioned or are planned subject to cost. Some of the following high quality and low cost courses have already been attended by a number of food safety officers including four Officers on the 3 day HACCP course 27, 28 and 29 September 2011. Six Officers attended the Vacuum Packing Course held on the 20/10/11.</p>

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3.2.14 Continued				<p>Imported Food Course in Wirral, on Wednesday, 17/08/11 was attended by four EHOs.</p> <p>The FSA's Risk Rating Seminar previously delivered in 2010 was rolled out again. All Officers have now undertaken this along with additional food safety training provided by an external trainer.</p> <p>Two EHO's that have recently moved onto the food unit attended the Investigation Skills Course in Hyde, Tameside in October 2011.</p> <p><u>Internal Monitoring</u> Inspections that have changed to a higher category from a lower category will be checked by the Principal Officer. Other actions including prosecutions, notices, closures, seizures and sampling will also be checked periodically. This focused audit is in line with the Food Standards Agency's 'Make Every Inspection Count' document which details internal audit procedures. This is to ensure that issues of poor quality or failings are identified and corrective action is taken to improve and maintain levels of service.</p>

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3.2.14 Continued				The procedure is detailed in the Service Control work Instruction.
3.3.5 Ensure that food law enforcement, in relation to the service of hygiene improvement notices, is carried out in accordance with the Food Law Code of Practice, centrally issued guidance and the Authority's own enforcement policy. [The Standard – 15.3 and 15.4]	Completed	Set up a procedure to ensure that follow up action takes place at the time determined by the notice and confirm compliance by FBOs.	Completed	Hygiene Improvement Notice Checklist used for all Hygiene Improvement Notices. Officers instructed to visit premises on expiry of notice to check compliance and to write to the FBO confirming compliance with the notice(s).
3.4.5 Expand and implement its internal monitoring procedures to include the qualitative monitoring of all areas of food law enforcement activity and ensure that appropriate records are retained to verify conformance with the Standard and relevant Codes of Practice and centrally issued guidance. [The Standard – 19.1 and 19.2]	Completed	Expand the Service Control procedure to include monitoring of enforcement activity.	Completed	Internal monitoring procedures have been reviewed inspections that have changed to a higher category from a lower category will be checked by the Principal Officer. Other actions including prosecutions, notices, closures, seizures and sampling will also be checked periodically. This focused audit is in line with the Food Standards Agency's 'Make Every Inspection Count' document which details internal audit procedures. This is to ensure that issues of poor quality or failings are identified and corrective action is taken to improve and maintain levels of service. The procedure is detailed in the Service Control Work Instruction.

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.4.9 Investigate food and food premises complaints received in accordance with the timescales noted within the Authority's own procedures. [The Standard – 8.2]	Dependent on increased staff resource	Identify staff resource necessary and increase establishment within the Food Team to ensure sufficient number of authorised officers to investigate food and food premises complaints within timescale.	Completed	The increase in numbers of staff in the food unit will ensure that food complaints and food premises complaints are responded to within the 7 day target if not sooner for urgent cases including vermin sightings in food establishments.