

## Updated Action Plan for Newport City Council

Audit date: 16-17 February 2011

Action Plan updated: 31 January 2012 and 23 April 2013

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.8 Further develop the service planning arrangements, in accordance with the Service Planning Guidance in the Framework Agreement. The Plan should include a comparison of the resources required to deliver the imported feed (and inland feed) law enforcement service against the resources available to the Authority. [The Standard – 3.1]</p>	<p>31/12/11</p>	<p>Increased Official Controls planned to be implemented for imported feed. To assess the impact of this process as far as resource is concerned can only be obtained when implemented.</p> <p>Service Plan 2011/2012 documentation to include resource considerations.</p>	<p>Revised date for completion: 31/10/13</p>	<p>Draft Service Plan 2012/13 produced for approval via strategic assessment depending on level of resource for 2012/13. Plan to include resources required against resources available to deliver the service in accordance with annual national feed enforcement priorities, financial and staffing allocation to be included. Cover arrangements to be considered.</p> <p>Increased checks undertaken on consignments received at docks since audit. FTE allocation now 0.475.</p> <p>Authority to make enquiries as to how FTE can be reported to Cabinet or a senior delegated officer.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.12(i) Review and expand the draft imported feed control procedure to include arrangements for systematic, risk based monitoring at the port. Other procedures should be reviewed to take account of imported feed activities. [The Standard – 4.1]</p>	30/09/11	Work instructions to be produced and procedures to be amended to reference these documents.	Completed	Imported feed control work instruction has been reviewed to include arrangements for systematic, risk-based checks at the port. Other work instructions being reviewed to take account of imported feed.
<p>3.1.12(ii) Review the document control system for all documentation relating to the Authority's imported feed law enforcement activities to ensure that documents are adequately controlled. [The Standard– 4.2]</p>	31/07/11	Relevant procedures to be given read only status and given revision number if updated.	Completed	<p>Document control system has been reviewed and a new system is now in place, which is password protected and officers have 'read only' access. Document control work instruction developed and work instructions to be reviewed annually and as/when changes necessary.</p> <p>Work instructions are being produced as process is being progressed, to be finalised by Trading Standards Manager.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.1.16 (i) Develop a documented procedure for the authorisation of officers and ensure that the level of authorisation is linked to the level of qualifications and competence required by the Feed Law Enforcement Code of Practice and centrally issued guidance. [The Standard – 5.1]	30/09/11	Update of delegation and authorisation process.	Revised date for completion: 31/10/13	<p>Process updated for whole of Public Protection. Trading Standards Manager now delegated to authorise officers. Regulations linked to authorisation documents. Requirements assessed by Legal Department.</p> <p>Role of Animal Health Officers on feed law enforcement is to be further considered.</p> <p>A documented authorisation procedure has been developed. This requires linking to officers level of competency.</p>
3.1.16(ii) Review and update the authorisation documents to ensure that they include references to all relevant and up to date legislation. [The Standard – 5.1]	31/07/11	Documentation to be checked, however the documents are general and not specific to Regulations. Officers individual authorisation documents to be checked and amended as required.	Completed	Documents were updated however further updating now required. The process for updating legislation is now in place.
3.1.16(iii) Ensure that all officers involved in imported feed enforcement complete the necessary 10 hours CPD training in accordance with the Feed Law Enforcement Code of Practice. [The Standard – 5.4]	30/09/11	Attend training courses to ensure CPD is up to date.	Completed	<p>All available courses attended. CPD requirements completed for PTSO-lead.</p> <p>It is recognised that further training may be necessary for other officers once feed roles and responsibilities agreed.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.20 Complete the exercise to update the feed establishment database. Develop and implement a procedure to ensure that the database is accurate, reliable and up to date. [The Standard – 11.1 and 11.2]</p>	<p>30/09/11</p>	<p>Development and implementation of procedure.</p>	<p>Completed</p>         <p>Revised date for completion: 31/10/13</p>	<p>Audit undertaken of feed register as details found to be incorrect and have been corrected. Details relating to previous feed visits have been inputted into the database.</p>  <p>Feed inspections on farm on schedule in line with animal health plans. Verification of details will be established on rolling programme in line with animal health inspections – depending on resources.</p>  <p>Documented procedure is to be developed and implemented to ensure database is updated, reliable and accurate.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.23 Further develop liaison arrangements with other port authorities, local authorities, the port operator and importers with the aim of ensuring that all imported feed consignments are identified, origin and status confirmed and to help facilitate efficient, effective and consistent enforcement. [The Standard – 18.1]</p>	<p>Completed</p> <p>Completed</p> <p>31/12/11</p>	<p>Working relationship with importers, home authority officers, other local authorities and Port Health to be expanded.</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p>	<p>Direct contact made with importers for consignments. Procedures being implemented in conjunction with Port Health.</p> <p>Attendance at National Ports Panel meetings. Contact made with port operator, shipping agents and importers. Further liaison with inland LAs being considered, including a traceability exercise.</p> <p>Development of a 'Greater Gwent' feed group. Feed sampling liaison/buddying exercise with another Wales LA.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.2.11(i) Review and expand the draft imported feed control procedure to include arrangements for systematic, risk based monitoring of imported feed from third countries at the port and ensure that systematic risk based checks are carried out at the port. [The Standard – 4.1, 12.1 and 12.3]</p>	Completed	Risk based assessment to be produced to allow proportionate Official Controls to be applied.	Completed	Risk assessment process initiated for consignments received at docks. Work instructions have been tested and are now in place, subject to finalisation by Trading Standards Manager.
	30/09/11	Draft procedure/work instructions to be reviewed and expanded.	Completed	Increased checks undertaken on consignments received at the docks since the audit. Manifests to be subject to on-going monitoring and systematic, risk based checks on consignments.
			Completed	Work instruction for dealing with imported feed at docks developed to provide clarity and to include reference to UKFSS, RASFF's, cover arrangements for notification of incoming consignments in absence of PTSO and checks.

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.2.11(ii) Set up and implement a sampling policy, programme and procedure/work instructions for imported feed sampling. [The Standard – 12.4 and 12.5]</p>	<p>30/09/11</p>	<p>To be put in place.</p>	<p>Completed</p>          <p>Completed</p>	<p>Sampling policy developed and implemented. Samples taken in accordance with policy and work instruction.</p> <p>Formal sampling exercise – operation anchorage took place at docks with assistance of another Wales LA.</p> <p>Sampling programme developed and annexed to Feed Service Plan 2012/13. LA budget and minimum number of samples to be included. Planning programme is difficult as port is an overspill port and it is difficult to predict sampling requirements.</p> <p>Sampling work instruction to be expanded to be clearer on UKFSS and portion for importer to be notified and action on receipt of results.</p> <p>Sampling programme working effectively to be reviewed in light of recently issued guidance and effectiveness of informal vs formal samples.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.2.15 Ensure that interventions/inspections of feed establishments include all the elements appropriate to the type of business being inspected and that appropriate associated records are made of checks undertaken. Expand the existing generic inspection procedure or develop and implement a procedure on interventions/inspections of feed establishments (including imported feed) in accordance with the Feed Law Enforcement Code of Practice. [The Standard – 7.2, 7.3 and 7.4]</p>	31/12/11	Improvement of feed inspection records.	<p>Completed</p> <p>Completed</p> <p>Revised date for completion: 31/10/13</p>	<p>Other LA records observed and new form produced for farm inspections in line with the rationalisation of forms for inputting details on the database.</p> <p>Work instruction on dealing with feed at farms developed and AHOs now acting as eyes and ears.</p> <p>FSA aide memoir now being used for project work and a general form in use for LA work. The level of detail recorded on inspection forms is to be improved to ensure there is an auditable record to gain assurance that effective official controls are carried out.</p>



TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.2.19(i) Review and update the enforcement policy to include up to date legislation and relevant imported feed enforcement activities in line with centrally issued guidance. [The Standard – 15.1]	31/12/11	The Enforcement Policy is to be re-drafted by the Public Protection Manager.	Revised date for completion: 31/10/13	A new Enforcement Policy is in development.
3.2.19(ii) Develop formal enforcement procedures for the range of enforcement actions and follow up action available to control imported feed in accordance with the relevant legislation, the relevant Code of Practice and centrally issued guidance. [The Standard – 15.2]	31/12/11	Pack to be produced for Officers with notices etc.	Completed  Revised date for completion: 31/10/13	Enforcement toolkit produced including notices etc. Notices include Newport City Council details. Work instructions on evidence, cautioning and interviewing suspects in place.  Draft work instruction on animal feed enforcement to be expanded.  Full range of Notices to be included in pack and local Magistrates Court details added to Notices.  A full range of enforcement procedures needed to be developed and implemented.

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.2.25 Set up and implement a procedure for initiating and responding to feed (and food) alerts and RASFF notifications and where relevant EC decisions. The procedure should consider out of hours contact arrangements and cover for absences. [The Standard – 14.1]</p>	<p>Completed</p> <p>31/07/11</p>	<p>Alerts to be actioned on an individual basis, relevant alerts to be sent to Associated British Ports.</p> <p>Procedure/work instructions to be developed.</p>	<p>Completed</p> <p>Revised date for completion: 31/10/13</p>	<p>Food and Feed alert instruction in place in relevant work instructions. RASFF checked for products as received from outside EU. Alerts checked.</p> <p>A procedure for responding to RASFFs and alerts had been developed. This required expansion to include the initiation of alerts.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.3.3 Develop and implement a documented internal monitoring procedure to include imported feed law enforcement activities at the Port and inland. Implement the procedure to verify the Service's conformance with relevant legislation, official guidance and the Standard. Records of monitoring checks should be maintained. [The Standard - 19.1, 19.2 and 19.3]</p>	<p>31/12/11</p>	<p>Meetings to be scheduled to update progress of checking process. Notes to be produced.</p> <p>Procedure to be developed and implemented</p>	<p>Revised date for completion: 31/10/13</p>	<p>Internal monitoring of all service requests being undertaken by Trading Standards Manager. Overview of farm work undertaken by PTSO. Team monthly meeting reports produced and considered.</p> <p>Service request procedure covers enquiries and complaints however a specific procedure/work instruction should be developed and implemented on internal monitoring to include qualitative and quantitative monitoring to verify conformance with legislation, official guidance and the Standard. This should include the present monitoring undertaken including the monitoring of consignment checks.</p>
<p>3.3.5 Maintain up to date, accurate and comprehensive records in retrievable form for all imported feed activities. [The Standard – 16.1]</p>	<p>31/07/11</p>	<p>Checklist for each visit and consignment to be produced with detailed information. Records to be scanned on to Uniform database.</p>	<p>Completed</p>	<p>Checklist for imported feed consignments with detailed information and risk assessment in use. Records being scanned onto database. Sampling and feed inspection records being maintained.</p>