

## Updated Action Plan for River Tees Port Health Authority

Audit dates: 19-20 October 2010

Action Plan updated: 10 May 2011, 26 January 2012 and 21 June 2012

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.12(i)            (a) Complete the review of RTPHA's organisation and arrangements.</p> <p>b) Draw up, document and implement the revised documented RTPHA Service Plan in accordance with Service Planning Guidance. The Plan should include a comparison of the resources required to deliver the imported food law enforcement service against the resources available to the Authority, based upon the full range of demands placed upon it, including all RTPHA's statutory duties. [The Standard – 3.1 and 3.2]</p>	<p>Completed</p> <p>01/04/11</p>	<p>(a) The Review of RTPHA has recommended that the service is delivered by two EHOs and one TO under the direction of the PEHO (Food) and Regulatory Services Manager. This structure must be approved by the RTPHA Board and involves recruiting at least one EHO. It is intended that the second EHO post will be filled by one of the current TOs who will be supported by R&amp;CBC to become EHRB registered. The recruitment process will also have to be approved by R&amp;CBC Appointments Panel.</p> <p>Arrangements for service delivery have been based on the structure recommended as part of the Service Review. A limited service will be delivered based on risk and current intelligence until the structure is approved and the proposed posts are filled.</p> <p>(b) A Service Plan will be drawn up when a structure for the Authority is finalised.</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p>	<p>Review completed and approved by the joint board on 25/02/11 and is now implemented.</p> <p>The Service is now staffed by one EHO, one TSO and one Enforcement Officer. The amendment from two EHOs to an EHO and a TSO was approved by the joint board on 02/09/11.</p> <p>A Service Plan has been produced and approved by the joint board on 03/06/11. Resource considerations and demands were detailed in report to the joint board. Service Plan 2012/2013 to include resource considerations and demands. This Service Plan was presented to the joint board at its meeting on 01/06/12 and was approved.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.1.12(ii) Consider the imported feed control arrangements and responsibilities at the port in the Service Delivery Plan. Alternatively, the individual authorities within Teesport should ensure that their arrangements for the control of feed through points of entry in their administrative area are detailed within their feed service delivery plans. [The Standard – 3.1]	Completed	Imported feed control will be included in the Service Plan and arrangements put in place to ensure that official controls are carried out by RTPHA.	Completed	RTPHA is now a feed authority and it has therefore been agreed with the Riparian Authorities that RTPHA will carry out controls for imported feed. Imported feed control is included in the Service Plan 2011/2012. Imported feed control is included in the Service Plans 2011/2012 and 2012/2013. Routine checks are also carried out at relevant terminals for bulk feed imports.
3.1.12(iii) Carry out a review of the Service Plan and any variance in meeting the Plan should be clearly addressed in the 2011/2012 Plan. [The Standard – 3.3]	01/04/11	A review of the service provided in 2010/2011 will be carried out which will inform the Service Plan for 2011/2012.	Completed	A review of the service provided in 2010/2011 was carried out and the Service Plan for 2011/2012 is complete.
3.1.15(i) Review and expand appropriate procedures to take account of imported food and feed activities. Ensure that all RTPHA documented policies and procedures are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance. [The Standard – 4.1]	30/09/11	Where appropriate it is intended to produce joint procedures for RTPHA and R&CBC's Food Team. For work specific to port health such as imported food and feed controls including sampling at the port separate policies and procedures will be developed all of which will be reviewed on a regular basis including when new legislation is introduced.	Completed	A Quality Management System is now in place. Where appropriate the Quality Manual and Procedures apply to both the Food Team of R&CBC and RTPHA. Standard Operating Procedures are now in place for the port health service and include procedures for the control of imported food and feed.
3.1.15(ii) Set up, maintain and implement a document control system for all documentation relating to the Authority's enforcement activities. Any amendments to documents should be appropriately authorised. [The Standard – 4.2]	30/09/11	It is intended to incorporate all documentation relating to operation of RTPHA into the Quality Control Procedures for R&CBC's Food Team.	Completed	A Quality Management System is now in place and this includes a Quality System Procedure for Document and Data Control.

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.1.23(i) Review the procedure for the authorisation of officers to ensure that it includes references to all relevant and up to date legislation. Ensure that the procedure is fully implemented including the competency assessments. [The Standard – 5.1]	01/04/11	<p>The Authorisation Procedure will be reviewed to include competency assessments for all officers. The Regulatory Services Manager will ensure that Authorised Officers from the riparian authorities possess the required qualifications and competencies.</p> <p>R&amp;CBC will ensure that all officers receive the required training.</p>	<p>Completed</p> <p>Completed</p>	<p>The Procedure for the Authorisation of Officers is completed and is part of the Quality Management System. Authorisations for the officers of the riparian authorities are limited to assisting with import controls and are in accordance with Memorandum of Understanding (MoU) between RTPHA and the riparian authorities. The MoU was presented to the joint board on 02/09/11.</p> <p>Officers from RTPHA have attended a significant amount of training and shadowing visits. Officers from the riparian authorities have attended a bespoke port health training course. It intended to deliver this training course on a yearly basis.</p>
3.1.23(ii) Ensure that officers are authorised in line with their qualifications, training, experience and the relevant Code of Practice. A sufficient number of authorised officers should be appointed to carry out the import controls, including out of hours cover arrangements. [The Standard – 5.3]	01/04/11 or as appointed	<p>Officers currently in post at RCBC are carrying out port health work however they require further training which is being addressed. (See 3.1.23 (iii))</p> <p>The structure proposed in the Service Review will provide sufficient resources to carry out the necessary official controls and for arrangements for out of hours cover to be put in place. This structure must be approved by the Board of the RTPHA.</p> <p>The structure will be fully staffed.</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p>	<p>Officers of the R&amp;CBC Food Team are not required to routinely carry out port health work.</p> <p>The staffing structure for RTPHA was approved by the joint board on 25/02/11. Arrangements for out of hours cover are in place and based on service demand.</p> <p>RTPHA is now fully staffed and all officers have received suitable training and are appropriately authorised.</p>

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<p>3.1.23(iii) Officers with lead responsibility for the point of entry should have the necessary specialist knowledge. Ensure that all officers and appropriate support staff involved in import controls at the port receive relevant training in accordance with the Food and Feed Law Codes of Practice. [The Standard – 5.2 and 5.4]</p>	30/06/11 and on-going thereafter	Attendance at Feed Sampling training is arranged for Lead Officer (PEHO Food) and the TSO in the Food Team. It is intended that an imported food course will be arranged by R&CBC that all authorised officers can attend including officers from the riparian authorities and any newly recruited officers (if the posts are approved).	Completed	<p>Imported feed course took place on 14/03/11 at R&amp;CBC and was attended by PEHO, SEHO (Food), TSO (Port Health) and the Enforcement Officer (Port Health).</p> <p>PEHO, EHO (Port Health) and the TSO (Port Health) have attended FSA feed sampling courses.</p> <p>The PEHO and the three port health officers have visited the port of Felixstowe for two day shadowing visits.</p> <p>The PEHO and the three port health officers have attended various courses including the FSA small ports course and the notice drafting course.</p>
	28/02/11	In the interim officers currently in post will complete the FSA online training in imported food.	Completed	<p>Officers of RTPHA and authorised officers from the R&amp;CBC Food Team have completed this training. Adequate resources are available for officers to continue to attend appropriate training.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.27(i) Review the inspection facilities at Teesport and ensure that suitable facilities and equipment are available for physical checks of imported food and feed. [The Standard – 6.1]</p>	<p>30/06/11</p>	<p>Arrange a meeting with Port Operator at Tees Port and UKBA to discuss and put in place arrangements for the facilities at the port to be improved and better ways of working together.</p> <p>Meet with UKBA to discuss working arrangements</p> <p>Equipment will be purchased based on information provided by FSA and as required when sampling is carried out.</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>Completed</p>	<p>Now have working relationship with the port operator and a dedicated examination facility at the port.</p> <p>Now have a working relationship with UKBA at Tees Port.</p> <p>Equipment including consumables has been purchased. Adequate provision made within current budget for in going requirements.</p> <p>The Port Operator now has a documented procedure in place for the management of food/feed safety. Arrangements are in place for the repair and maintenance of the port health examination facility including pest control.</p>
<p>3.1.27(ii) Ensure that an official monitoring return is provided to the Agency for 2009/2010 and that returns include accurate information on imported food activity. [The Standard – 6.3]</p>	<p>Completed</p>	<p>It is intended to record all relevant activities on RCBC Information Monitoring System (IMS) to enable future monitoring returns to be completed in a timely manner.</p> <p>Monitoring checks to be carried out to ensure that accurate information is submitted.</p>	<p>Completed</p>	<p>Monitoring Return for 2009/2010 and 2010/2011 completed and submitted to FSA. IMS now capable of recording and reporting all port health work</p> <p>Performance Monitoring procedure now part of the Quality Management System which includes checks on the data within IMS.</p>

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<p>3.1.30 Review the existing liaison arrangements with businesses involved in importing food and feed at the port and with agencies involved in imports, with the aim of ensuring that consignments are presented at the appropriate designated port, all imported food and feed consignments are identified and to help facilitate consistent enforcement. [The Standard – 18.1]</p>	<p>30/06/11</p>	<p>Produce a procedure for the provision of advice and education.</p> <p>Identify and make contact with businesses involved in importing food and feed through Tees Port. Regularly liaise with operators to ensure RTPHA has updated information on food and feed being imported.</p> <p>Arrange a seminar for shipping agents and importers to advise on import restrictions at Tees Port, current legislation and to establish means of providing updates to legislation.</p> <p>Provide electronic updates on new legislations and all emergency decisions.</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>Completed</p>	<p>The arrangements for the provision of advice and education are detailed in the Service Plan 2011/2012. This will continue in future service plans.</p> <p>RTPHA has built and continues to build relationships with importers and has a database of contact details.</p> <p>A seminar was arranged in August 2011 which was attended by two importers. Following discussion with the Port Operator it was decided that holding a seminar for importers and agents would not be a worthwhile activity as it would not be well attended.</p> <p>Relevant importers are provided with updates as appropriate.</p> <p>RTPHA now has its own website which is used to provide appropriate updates to agents and importers.  <a href="http://www.tessporthealth.co.uk">www.tessporthealth.co.uk</a></p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.2.11(i) Further develop and implement the Imported Food Control procedure for the inspection of food and feed. [The Standard – 12.3]	30/06/11	Produce a procedure for Imported Food and Feed Control including templates for forms, notices and other relevant documents.	Completed  Completed	Standard Operating procedures are now in place for imported food and feed control, organic verification, plastic kitchenware controls and dealing with unsatisfactory consignments.  Routine checks for bulk feed now include all the bulk terminals at Tees Port. Checks are made by telephone and/or email at least every three months. Physical checks at the terminals are carried out on a routine basis as part of and in addition to ship inspections. The standard operating procedure has been revised accordingly.
3.2.11(ii) Develop and implement a documented sampling policy, procedures and a risk based and targeted imported food and feed sampling programme. [The Standard – 12.4 and 12.5]	30/06/11	Produce a policy and a procedure for sampling imported food and feed based on intelligence and risk.	Completed	A sampling policy has been produced. A sampling plan, including costs, was drawn up for 2011/2012 and adequate provision for funding sampling was made in the budget. Procedures for food and feed sampling have been produced.

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.2.16(i) Complete the review of the enforcement policy. Set up and implement documented procedures for follow up and enforcement actions on imported food and feed. [The Standard – 15.1 and 15.2]</p>	30/06/11	<p>Regulatory Service Manager to complete and circulate the Enforcement Policy for Regulatory Services for consultation.</p> <p>The Enforcement Policy is in draft form and its completion is now the responsibility of the PEHO (Health and Safety) with input from other Principal Officers in Regulatory Services.</p>	Completed	<p>The Enforcement Policy for Regulatory Services which includes RTPHA was presented to the Cabinet of R&amp;CBC in January 2012. It will then be presented to the joint board of RTPHA at its meeting on 24/02/12. It will then be presented to the joint board of RTPHA at its meeting in September 2012.</p> <p>Procedure for dealing with unsatisfactory consignments developed.</p> <p>R&amp;CBC formal enforcement procedures for e.g. prosecutions, simple cautions apply to RTPHA.</p>
<p>3.2.16(ii) Ensure that formal enforcement actions are carried out in accordance with the relevant legislation, the relevant Code of Practice and centrally issued guidance. [The Standard – 15.3]</p>	30/06/11	<p>All officers will receive training specific to port health controls and general enforcement and legal principles. Control of enforcement action will be formalised for RTPHA by the Regulatory Services Enforcement Policy and officers will have regard to this at all times.</p>	Completed	<p>All officers have attended specific port health training and where appropriate officers have received training in areas such as investigations skills and PACE. The officers are aware and have regard to the draft Enforcement Policy.</p>
<p>3.3.3 Develop and implement a documented internal monitoring procedure to include all aspects of the imported food and feed service. Implement the revised 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>	30/06/11	<p>It is intended to update and implement the Quality System for R&amp;CBC's Food Team to incorporate the port health service.</p>	Completed	<p>The Quality Management System has been reviewed and updated for the Food Team and RTPHA and includes an internal monitoring procedure.</p>



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3.3.5 Maintain up to date, accurate and comprehensive records in retrievable form for all imported food and feed activities. [The Standard – 16.1]	01/04/11	All port health work will be recorded on R&CBC Information Monitoring System (IMS). It is intended that all officers will be fully trained and the new system will be used from 01/04/11.	Completed	IMS now in use for all port health work including reporting capabilities.