

Updated Action Plan for Sefton Metropolitan Borough Council

Audit date: 2-3 March 2011

Action Plan updated: 21 November 2011 and 6 March 2013

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.6 Further develop the service planning arrangements, in accordance with the Service Planning Guidance in the Framework Agreement, to 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>31/03/12</p>	<p>Compare resources required to deliver the imported and inland feed service against resources available to the Authority, based upon the full range of demands placed upon it.</p> <p>Integrate the assessment into future Service Plans.</p>	<p>Completed</p>	<p>The Service carried out a project assessment of the level of work for Sefton in terms of potential feed consignments coming through the Port of Liverpool between April and June 2011.</p> <p>This work was assimilated into the 'Port of Liverpool Collaborative Partnership' project involving the four authorities responsible for imported feed law enforcement at the Port of Liverpool. The 2012/13 Trading Standards Animal Feed Plan confirmed that Sefton MBC was the lead authority for the Port of Liverpool Collaborative Partnership and that three officers from the Authority were authorised to enforce all the relevant legislation.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.1.11(i) Ensure that all documented policies and procedures relating to its enforcement activities, including those relevant to imported feed control activities, reflect the Authority's operational practices and are reviewed at regular intervals and whenever there are changes to legislation and centrally issued guidance. [The Standard – 4.1]	30/06/11 30/09/11	Develop a robust review system for procedural review. Carry out a review of documented policies and procedures against operational practices, legislation and centrally issued guidance.	Completed	All relevant procedures have been reviewed and updated.
3.1.11(ii) Set up, maintain and implement a control system for all documentation relating to its enforcement activities to ensure that documents are adequately controlled. [The Standard– 4.2]	30/09/11	Introduce adequate control measures for document procedures (read only facility).	Completed	A procedure for procedural control has been implemented to include 'read only' access and password protection. All procedures have been dated and tagged with an issue number.

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.1.15(i) Review and fully implement the 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]	31/05/11 31/05/11 31/05/11	Review and update the documented Animal Feed Enforcement Authorisation of Officers Procedure to include the means for assessing officer competency linked to their responsibilities and duties. Identify all officers that may be involved in the delivery of feed law enforcement, including imported feed. Ensure levels of authorisation granted are linked to officer competency.	Completed and ongoing as part of 'Port of Liverpool Collaborative Partnership' project	Authorisation procedure updated to include requirement for assessing officer competency prior to authorisation. Relevant officers identified and officer resources have been included in the 'Port of Liverpool Collaborative Partnership' project involving all four partner local authorities.
3.1.15(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]	31/05/11	Review and update authorisation protocols to ensure that officers are appropriately authorised for the duties they are expected to carry out.	Completed	Officer authorisation documents for all relevant officers reviewed, updated and re-issued.
3.1.15(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]	31/10/11	Identify sources of appropriate training and make arrangements for officer attendance to ensure that relevant officers receive the minimum ongoing 10 hours of feed related training per year based on Continuing Professional Development, in accordance with the Feed Law Enforcement Code of Practice.	Completed	Ongoing - officers are attending available feed related training courses.

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.1.15(iv) Maintain records in retrievable form of relevant academic qualifications, training and experience of each authorised officer, in accordance with the Feed Law Enforcement Code of Practice. [The Standard – 5.5]	Completed	Maintain officer learning logs in dedicated file to contain up to date qualification, training and experience records.	Completed	Dedicated electronic folder created – ‘FSA Feed Officer Training Logs.’ This contains a summary of the type and amount of training undertaken by each officer.
3.1.19 Ensure that timely returns on analytical results relating to high risk imported feed are provided in official monitoring returns to the Agency. [The Standard – 6.3]	31/10/11	Obtain dedicated ‘quarterly’ return forms from FSA for timely submission.	Completed	Relevant forms obtained and timely returns submitted.
3.1.21(i) Complete the exercise to update the feed establishment database. [The Standard – 11.1]	Completed	Finalise database of feed establishments in area.	Completed	Up to date list of feed establishments sent to FSA on 07/04/11. Further update submitted on 01/09/11.
3.1.21(ii) Develop and implement a procedure to ensure that the database is accurate, reliable and up to date. [The Standard – 11.2]	31/12/11	Develop and implement a procedure to ensure that the database is accurate, reliable and up to date.	Completed	This work was assimilated into the wider ‘Port of Liverpool Collaborative Partnership’ project. Procedure developed and implemented in 2012/11.

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
<p>3.1.25 Reinstate and 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 and origin and status confirmed, to improve accuracy and quality of data and to help facilitate efficient, effective and consistent enforcement. [The Standard – 18.1]</p>	<p>Completed</p>	<p>Create Port of Liverpool Liaison Group in partnership with Liverpool Trading Standards, Wirral Trading Standards, Mersey Port Health Authority and the port operator.</p>	<p>Completed and ongoing as part of 'Port of Liverpool Collaborative Partnership' project</p>	<p>Initial meeting with PHA held on 31/03/11. Sefton to lead quarterly meetings.</p> <p>Liaison meeting with port operator held on 08/03/11.</p> <p>Port of Liverpool Collaborative Partnership in place with Sefton MBC taking on the lead role. Liaison Group meetings of the four participating authorities taking place quarterly.</p>

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<p>3.2.13(i) Ensure that systematic, risk based, proportionate monitoring of imported animal feeding stuffs is carried out to ensure that all relevant imported feeding stuffs consignments are identified and appropriate and proportionate official control activity is undertaken. [The Standard –12.1]</p>	31/07/11	Carry out initial assessment and monitoring of Imported Feed (Project basis) May – June 2011 to develop risk based monitoring programme.	Completed	<p>Sefton MBC draft FSA audit report shared with Mersey PHA, who were advised of 2011/12 sampling priorities for imported feed.</p> <p>Request for list of importers and types of feed imported through the Port of Liverpool sent to port operator. A 'directory' of feed activity within the port was produced as part of the 'Port of Liverpool Collaborative Partnership' project.</p> <p>Sefton have acquired a terminal to access the electronic ship manifest database system and systematically check this for imported feed imports.</p>
<p>3.2.13(ii) Set up and implement a sampling policy and programme for imported feed sampling and carry out risk based imported feed sampling in accordance with the policy and programme. [The Standard – 12.4 and 12.6]</p>	31/07/11	Set up and implement a sampling policy and programme based on the initial assessment and monitoring of imported feed -as in 3.2.13(i) above.	Completed	<p>An animal feed sampling plan in accordance with national enforcement priorities has been implemented for Sefton MBC and further work is ongoing as part of the 'Port of Liverpool Collaborative Partnership' project.</p>

TO ADDRESS RECOMMENDATION (INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
3.2.18 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 and maintained of checks undertaken in accordance with the Feed Law Enforcement Code of Practice. [The Standard – 7.2 and 7.3]	30/06/11 31/12/11	Devise and implement a pro forma inspection form for use in feed premises inspections. Ensure primary inspections have been carried out at all feed establishments.	Revised date for completion: 31/10/13	A detailed inspection aide-memoire has been implemented and a primary inspection programme commenced, targeting the highest risk premises as a priority.
3.2.23 Review the documented feed detention and seizure procedures to include operational guidance for officially detaining consignments of imported feed at the port. Additionally develop formal enforcement procedures for the full 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]	30/05/11 30/09/11	Review feed detention / seizure procedures and correct to include key powers of detention under Regulation 32 – Official Feed and Food Control Regulations 2009. Develop enforcement procedures to cover the full range of enforcement options available for imported feed law enforcement activity.	Completed and ongoing as part of 'Port of Liverpool Collaborative Partnership' project	Sefton MBC procedures updated and work was also assimilated into the wider 'Port of Liverpool Collaborative Partnership' project, with the aim of developing standard procedures for feed activity within the port.

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<p>3.3.2 Review and further develop and implement the 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>30/04/11</p> <p>Completed and ongoing monthly</p>	<p>Integrate Animal Feed Plans into Departmental Service Plan.</p> <p>Implement routine monitoring of imported feed activities Ensure routine performance monitoring is documented and records are maintained. (e.g. Officer 1:1's)</p>	<p>Completed</p>	<p>Internal monitoring procedure reviewed and implemented.</p>
<p>3.3.4 Maintain up to date, accurate and comprehensive records in retrievable form for all imported feed activities. [The Standard – 16.1]</p>	<p>30/09/11</p>	<p>Standardise feed law enforcement recording mechanisms using the Authority's database software system.</p>	<p>Revised date for completion: 31/10/13</p>	<p>This work is ongoing and is part of the wider 'Port of Liverpool Collaborative Partnership' project.</p>