

Completed Action Plan for Suffolk County Council

Audit date: 22-23 March 2011

Completed October 2015

TO ADDRESS (RECOMMENDATION UNCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.5 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]	Completed	Service plan document will determine the amount of time needed and the resources available.	Have instigated a data search as to the frequency of inspections, premises visited to determine the services level of commitment. Update July 2013 – Draft service plan is now with assistant directors – this has tried to be more consistent with the requirements of the framework agreement. Update March 2014 - Service Plan is now published. Action Completed.

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<p>3.1.10(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]</p>	<p>Completed</p>	<p>There are a number of related documents and procedures which need to be pulled together. These are currently under review as presently they do not reflect the services systems thinking (ST) approach</p>	<p>There are a number of alternative interventions adopted by the service which reflect our ST approach and resources available</p> <p>Update July 2013 - Written document for dealing with feed hazards now in existence. Memorandum of understanding with Port health is currently with our legal department for updating.</p> <p>Need for a written procedure to give officers an understanding of the relationship and working practices between us and port health. Also written procedure for feed hygiene registration.</p> <p>Update March 2014 - Written procedure written for Feed Hygiene Registration has been completed. Further procedures for dealing with complaints, our intervention procedures will be written in April 2014. Now</p>

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			using EETSA feed co-ordinated procedures.
3.1.10 (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 Standards – 4.2]	Completed	This approach does not necessarily fit in with our method of working	<p>Documents and procedures have already been examined under our ST approach to eliminate waste and an excess of procedural steps.</p> <p>Update July 2013 - No formal control system is in place. However, all documents will be reviewed as part of the service plan update process.</p> <p>Update March 2014 - Yearly review of documents is booked in for April 2014. Monthly meetings already take place between the Food and Feed Lead officers to identify areas where written procedures or changes to procedures. – Complete</p>
3.1.15(i) Develop and fully implement a documented procedure for the authorisation of		There presently exists an electronic version of officers	It is our opinion that the Code of practices needs to be

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<p>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]</p>		<p>qualifications detailing CPPD and relevant qualifications. Competency criteria is difficult to interpret as there is no real guidance.</p>	<p>revised as it is too prescriptive in relation to the qualification criteria. Issue raised with the FSA.</p> <p>Update July 2013 - New DCATs procedure with Suffolk slant – all feed officers will need a manufacturer and retail visit to be signed off.</p> <p>Feed training record kept all officers working towards level 2.</p> <p>Update March 2014 - The authorisation of officers has now been reviewed in line with the new feed law code of practice.</p>
<p>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]</p>	<p>Completed</p>	<p>See above</p>	<p>Authorisation document presently not in existence.</p> <p>Update March 2014 - completed</p>
<p>3.1.15(iii) Maintain records in retrievable form of</p>	<p>Completed</p>	<p>Also instructions to staff to</p>	<p>New system for recording</p>

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relevant academic qualifications, training and experience of each authorised officer, in accordance with the Feed Law Enforcement Code of Practice. [The Standard – 5.5]		maintain these records and to establish a paper trail of relevant qualifications.	training/qualifications – all certificates must be kept in the folder. Update March 2014 - This is complete.
3.1.20(i) Review and update the feed establishment database to ensure that it contains relevant details of all feed establishments in the area. [The Standard -11.1]	Completed	Currently exists as a combination of paper and electronic copies	Have started to review with the purpose of identifying and coding relevant business. Update July 2013 - All RPA premises now on the system. Plans to employ a temp to ensure Northgate is accurate – once this is done feed hygiene spreadsheet will be removed. Update March 2014 - The original feed establishment database has been completely reviewed. Further work is scheduled for April 2014 to identify premises that may need to be feed hygiene registered. Action Completed.

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3.1.20(ii) Develop and implement a documented procedure to ensure that the database is accurate, reliable and up to date. [The Standard – 11.2]	Completed	The data base is subject to review and update on a regular basis. We see no merit in producing a document to ensure this taking place.	<p>Update July 2013 - Feed hygiene instruction will be written which will give officer guidance on checking accuracy.</p> <p>Update March 2014 - The implementation of new premises from April 2014 will be done by a dedicated member of staff, who will receive training. The monitoring that is currently in place looks at the recording and accuracy of the database system.</p> <p>Complete</p>
3.2.3 Ensure that systematic, risk based, proportionate monitoring of imported animal feeding stuffs and associated products is carried out to ensure that all relevant imported feedingstuffs consignments are identified and appropriate and proportionate official control activity us undertaken. [The Standard – 12.1]	Completed and on going	This is and must be based on a number of factors including a risk based approach, intelligence led, subject to resources available and so on.	Identifying and profiling imported feed has proved to be quite difficult as we have no effective means for importers, etc, informing us of incoming feed

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			<p>Update July 2013 – informal system in place which does need to be documented – all consignments now identified by Port Health – these are sent weekly to trading Standards who flag up any new importers to local authorities.</p> <p>Update March 2014 - All consignments are document checked. Intelligence is gathered about the importer in conjunction with the inland authority. In April 2014 Port Health and SCC will decide on the future activity and document this procedure for Port Health and SCC staff.</p>
<p>3.2.7 Further develop the sampling programme for imported feedingstuffs and associated products following appropriate liaison with the Port Health Authority and taking into account the findings from the review of the Authority’s database. Carry out risk based imported feedingstuffs sampling in accordance with the Authority’s sampling policy</p>	<p>Completed</p>	<p>Only way of effectively achieving this is to increase staff to ensure sampling is effective and targeted.PH already assist us with the sampling and checking of imported high risk Feed</p>	<p>Resource issue.</p> <p>Update July 2013- waiting for FSA funding for 2013-14 but liaison still taking place.</p>

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and programme. [The Standard – 12.4 and 12.6]			<p>Update March 2014 - Sampling is carried out using the national enforcement priorities. Sampling has been done on Suffolk importers who have been identified from the documentary checks. 2014-15 funding will not only take into account the national enforcement priorities but also the intelligence around the importer to ensure sampling is further risk based.</p>
3.2.12 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]	Completed and on going	Low and medium risk type visits are not a service priority and as such are not routinely inspected. However high risk inspections are maintained as are the records associated with these visits.	<p>Officers have been advised to maintain accuracy and appropriate date base coding to ensure this recommendation is complied with.</p> <p>Update July 2013 - Training has been carried out with feed officers.</p> <p>Update March 2014 - Officers are required to use FSA inspection forms where</p>

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			<p>appropriate and monitoring and feedback is given to officers on the quality of their reports.</p> <p>Complete</p>
<p>3.2.22 Develop and implement a suitable documented procedure for dealing with relevant imported feedingstuffs complaints and referrals. The procedure should make appropriate reference to the Council's Enforcement Policy and any associated procedures. [The Standard – 8.1]</p>	<p>Completed</p>	<p>This is outlined in our service plan. Complaints and referrals are processed in accordance with our procedures and recorded on our data base. This information is retrievable and reports are generated on a monthly basis.</p>	<p>We do not agree with the need to set up a separate documented procedure</p> <p>Update July 2013 - Procedure for feed hazards has been developed. Further procedure needed for port health work. Feel no need for procedures for routine work – this will be regularly monitored by accompanied visits.</p> <p>Update March 2014 - Procedure for dealing with complaints and referrals for feed in general will be written in March 2014. The procedure for dealing with a feed incident has been written. Completed.</p>

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3.3.2(i) Develop and implement a documented internal monitoring procedure to include all imported feed law enforcement activities including officer authorisations and feed inspections [The Standard – 19.1]	Completed	We feel this is not necessary as our level of control is considered sufficient.	<p>Update July 2013 - We have now started monitoring feed enforcement activities which will be done on a once a month basis. This has already highlighted issues that we have been able to action.</p> <p>Update March 2014 - Feed and Food lead officers meet once a month with the Principal TSO. Internal monitoring forms have been developed and are used.</p>
3.3.2(ii) Routinely verify the Service's conformance with relevant legislation, official guidance and the Standard. [The Standard – 19.3]	Complete	Resource intensive and does not fit in with our ST approach. Use existing up to date sources of information to be able to comply with this recommendation.	<p>Unlikely to implement any further</p> <p>Update July 2013 - This will be part of the new monitoring process and will be reviewed once a year with the service plan amendments. Plans in place to try and establish peer to peer reviews within EETSA next year.</p>

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			<p>Update March 2014 - Monitoring now takes place to ascertain if officers are correctly enforcing feed legislation. Complete.</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>Complete</p>	<p>Officers to be advised to maintain up to date, accurate and comprehensive records and to transfer any written records in retrievable form for all imported feed activities .Data base is capable producing the relevant reports.</p>	<p>Update July 2013 - 2 systems still in place. Agreement for a temp to come in to review records.</p> <p>Update March 2014 - All registered feed hygiene premises have now been reviewed and monitoring is continuing to ensure new premises are accurate and amendments to premises are correct.</p> <p>Complete.</p>