Action Plan for London Borough of Hillingdon Council

Audit date: 12-13 August 2015

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	PROGRESS	ACTION TAKEN TO DATE
5.1.6 (i) Finalise document and implement a service delivery plan for the period from 2015 onwards in accordance with the Service Planning Guidance in the Framework Agreement. Include in this plan an identification of the resources required to deliver the handling of incidents and alerts and compare them with the resources available to identify any shortcoming. The Plan should also outline the extent of the out of hours arrangements for both teams and the regional and local approach to feed service delivery by the team. [The Standard - 3.1]	1 st January 2016	Review service plan and implement, outlining arrangements for managing food and feed alerts including arrangements out of hours. Estimated resources required to deal with food and feed alerts will be based upon alerts in the previous year. Any shortfall in FTE will be identified.	Complete	Service plan for 2015 - 2018 Approved Resources outlined in Para 3.7.3 Out of hours arrangements 2.4.7 Feed Service delivery (appendix 9 Staffing Resources) Briefing prepared to go to cabinet member outlining resources needed versus resources available, in relation to food and feed incidents as a means of updating the Food
5.1.6 (ii) Carry out and document a performance review of the last year based on the Service Delivery Plan and submit it for approval to the relevant member forum or, where appropriately delegated, the relevant senior officer. [The Standard - 3.2]	30 th November 2015	Document performance review for 2014/2015 to submit to head of service,	Complete	Service Plan. Completed 2014/2015 Performance review submitted and approved.

5.2.20 (i) Review and amend its documented Food Health and Safety/Port Health Team food alerts procedure to prescribe the system which was being implemented for the initiation of alerts and the receipt, response to and dissemination of alerts during the audit. The procedure should also expand its scope to include and implement arrangements for feed alerts and a system for the receipt and management of all alerts outside normal office hours, including the provision of the facilities and equipment necessary. This must include the maintenance of up to date emergency (including out of hours) contact details for neighbouring Competent Authorities. The imported Food Team should document its food alerts arrangements in a procedure. [The Standard - 14.1]	1 st December 2015 1 st December 2015	Review Food Health and Safety/Port Health Team food alerts local procedures including arrangement for feed and alerts received outside normal office hours. Amend the Imported Food Team procedure to include the arrangements in place for dealing with food alerts.	Complete	The Imported Food Team procedure file has been updated to include its process for dealing with food alerts, incidents and notifications. Completed the following procedures:- Investigating Food Alerts for Action (FP6E) Investigating food incidents identified in LA area (FP7E) Out of Hours Officers have signed up to incident text alerts. All officers have access to the required shared drives and are therefore able to access notices and database information when required. Sampling equipment available within the civic centre building.
5.2.20 (ii) Document its response to and the outcome of each feed and food alert. [The Standard – 14.3]	1 st December 2015	Local procedures to highlight the approach to handling and recording food and feed alerts including detailing responses on Civica APP.	Complete	The Imported Food Team use the RIAMS system to outline any action that was taken following the publication of a food alert. A hyperlink to the alerton the FSA website is also provided. Completed The Food Health and Safety/Port Health Team use Civica (Flare) Service requests to record incidents and outline action taken.

5.2.20 (iii) Complete the written incidents procedure to reflect local arrangements for responding to feed and food safety incidents. [The Standard – 14.4].	1 st December 2015	Review Food/ feed alert procedures.	Complete	Completed. FP6E and FP7E
5.2.20 (iv) Review the qualifications and competence of the officer on the out of hours rota who is not a member of the Food Health and Safety/Port Health Team. Make any necessary changes to ensure these are consistent with their level of authorisation and duties and the F/FLCoP. [The Standard - 5.3]	1 st January 2015	Officer authorisation is restricted. Food incident and alerts reported out of hours will be deferred to another named food competent inspector from the out of hours rota.	Complete	Competency is considered and officer authorisation is restricted as is necessary. Food incident and alerts outside the competency of an out of hours officer will be reported to another named food competent inspector from the out of hours rota. Food related matters may be discussed with IFO (Imported Food Office) at weekends 9 - 3 core hours, no later that 8pm on contact telephone number 01895 558180.
5.2.20 (v) Notify local farms and raw milk purchasers of OTF status loss notifications in accordance with the Food Law Code of Practice Guidance and put in place a documented procedure to guide this process. [The Standard – 7.2 & 7.4]	1 st December 2015	Put in place documented procedure to guide notification of local farms of OTF Status loss. and overdue test reports.	Complete	OTF Letter completed and circulated. Completed documented Procedure. Examples of letters and corresponding APHA notifications provided to FSA.

5.4.9 (i) Set up, maintain and implement documented procedures for the Food Health and Safety/Port Health team for the procurement or purchase of samples, continuity of evidence and the prevention of deterioration or damage to samples whilst under its control in accordance with the FLCoP and centrally issued guidance. [The Standard – 12.5]	31 st January 2016	Review existing sampling procedures in the Food Health and Safety/Port Health team. Control of Evidence Procedure subject to Review	Complete	Completed documented procedure on procurement of samples Completed continuity of evidence procedure
5.5.8 (i) Amend the Enforcement Policy to make reference to the Regulator's Code at the next review. [The Standard – 15.1]	28 th February 2015	Briefing to go to Director and Cabinet member. Amend Enforcement Policy to include a reference to the Regulators Code at next review.	Committed to complete by March 2017	Remains Pending. The Enforcement Policy is being reviewed as part of a groupwide project.
5.5.8 (ii) Amend the procedure of the Food Health and Safety/Port Health team to include guidance for the detention and/or seizure of illegally imported food & feed inland through the use of TARP or OFFC powers. [The Standard – 15.2]	31 st January 2016	Review and amend the Food Health and Safety/Port Health Detention/Seizure procedure outlining arrangements for dealing with illegally imported food & feed inland through the use of TARP or OFFC powers.	Complete	Completed the following procedures • Detention and seizure of food (FP8E) • Completed (FP47E) Inland Imported Food Inspection Procedure (Regulation 19 TARP and Regulation 32 OFFC Regulations.)
				Completed amendment of Infectious Disease Policy

5.6.5 (i) Amend or append as appropriate the local documented outbreak procedure or MoU to include guidance on reporting incidents to the FSA and up to date emergency (including out of hours) contact details for nearby local authorities with responsibility for managing an outbreak. [The Standard – 13.1]	31 st March 2016	Review documented outbreak procedure and MoU and consider arrangements for reporting incidents to the FSA as well as liaising with nearby local authorities.	Complete	Completed amendment of Infectious Disease Policy
5.7.9 (i) Ensure that the Lead Feed Officer is given the specialist knowledge to have lead responsibility for this legislation and that all authorised officers receive the training hours prescribed by the F/FLCoP. Alternatively appoint an officer with the specialist knowledge to have lead responsibility for that legislation. [The Standard – 5.2 & 5.4]	30 th May 2016	Review of options for managing responsibilities including regional arrangements.	Complete	ALEHM act as regional feed lead
5.7.9 (ii) Maintain records of relevant qualifications and training of each authorised officer in accordance with the FLCoP. [The Standard – 5.5]	immediate	Review all records of qualifications ensuring they are up to date.	Complete	Completed Consolidation of all records of CPD and hours accrued. Completed Port Health Team spreadsheet record is up-to-date.

5.8.5 (i) Develop, maintain and implement a control system for all procedures relating to its Food Health and Safety/Port Health team enforcement activities to ensure that all are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance and that superseded documents are removed from use throughout the Authority. [The Standard – 4.1 & 4.2]	June 30 th 2016	Develop a document management system in the Food Health and Safety/Port Health team to ensure that all procedures are reviewed at regular intervals, The management system is to include a mechanism to remove superseded documents.	Complete	Document Management Policy Completed – DRAFT TEXT SUBMITTED BY HILLINGDON TBC
5.10.10 (i) Set up/review as appropriate, maintain and implement a documented procedure/s to ensure the food premises and trader databases of the Food Health and Safety/Port Health Team and Imported Food Team are accurate, reliable and up to date, within the limit of their statutory powers and responsibilities. [The Standard – 11.2]	30 th May 2016 1 st November 2015	Produce and implement a procedure to ensure that the food premises data base in the Food Health and Safety/Port Health Team is accurate and reliable and up to date. Introduce mechanisms for ensuring that clearing agent details are accurate and up-to-date.	Complete	Completed. The Imported Food Team has adjusted its procedure file to introduce mechanisms for ensuring clearing agent details are accurate and up-to-date. An officer has been delegated responsibility for contacting clearing agents at regular intervals to verify the accuracy of their details. The Team Manager and Principal EHO are responsible for updating internal systems with this information. Completed procedure FHS PR01 'Accuracy of food premises database' with standard reports table

5.12.11 (i) Review, finalise and implement its internal monitoring procedure for the Food Health and Safety/Port Health team to include the monitoring of alerts and reporting of incidents in relation to food and feed and existing internal monitoring arrangements for complaints and food sampling. [The Standard – 19.1 & 19.2]	31 st January 2016	Review, finalise and implement internal monitoring procedure for the Food Health and Safety/Port Health team to include the monitoring of alerts and reporting of food and feed incidents	Complete	Completed Procedure for Internal Monitoring arrangements for Inland Food and Feed Safety enforcement
5.12.11 (ii) Amend and implement its Imported Food Team internal monitoring procedure to include the monitoring of incoming RASFF alerts and the notification of incidents to the FSA. [The Standard – 19.1 & 19.2]	1 st November 2015	Review and implement Imported Food Team internal monitoring procedure to include the monitoring of incoming RASFF alerts and the notification of incidents to the FSA	Complete	The Imported Food Team internal monitoring document has been updated to include its process for dealing with food alerts, incidents and notifications, including contacting the FSA and inland Local Authorities.