

Action Plan for Gwynedd Council – Fersiwn Medi 2017 - September 2017 version**Audit Date: 22nd – 26th February 2016**

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.20 (i) Ensure future Service Plans for food hygiene and food standards are developed in accordance with the Service Planning Guidance in the Framework Agreement. In particular, an estimate of the resources required to deliver the services against those available should be provided and an explanation provided for any variances identified in the service review. [The Standard – 3.1]	Completed	Ensure that the annual plan conforms with the service planning advice and framework agreement.	<p>The 2017/18 Service Plan includes;</p> <p>An assessment of the resources available to the service and an estimate of the resource required to meet the framework agreement.</p> <p>Comment relating to areas of performance which did not meet the required standards and a comparison with the previous year's performance.</p> <p>A record that the Senior Public Protection Manager has accepted the plan.</p>
3.20 (ii) Ensure the performance review based on the previous year's Service Plan is submitted for approval to the	Completed		A procedure for directing a draft plan to the Senior Manager has been

relevant member forum or senior officer. [The Standard – 3.2]			adopted together with a method of evidencing the approval of the plan.
5.10 (i) Review and amend its authorisations to ensure officers are appropriately authorised under all relevant legislation and ensure officer competency assessments are documented. [The Standard – 5.1]	Completed		The officers authorisations have been subject to review. A new template is in use which allows for greater clarity in terms of what the individual is authorised to enforce.
TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
5.10 (ii) Ensure officers with specialist knowledge are appointed to have lead responsibility for food hygiene and food standards legislation. [The Standard – 5.2]	1/2/17 1/1/18	Formalise a programme for establishing competency for the lead officer based on specialist training , training within the authority and field experience. The training which is required has been identified and the officer will attend courses as and when they become available.	The officer who has been appointed as the lead officer for the Service has received a wide range of specialist food safety training. The officer has and continues to attend / undertake interventions , under supervision where required, to demonstrably build his competency.

<p>5.10 (iii) Ensure an appropriate number of authorised officers are appointed to deliver food hygiene and food standards official controls in accordance with the Food Law Code of Practice. [The Standard – 5.3]</p>	<p>1/4/17</p>	<p>As part of an ongoing programme of cuts Gwynedd Council removed one Environmental Health officer post (food safety) and one Health and safety officer post from the Welfare Unit structure during 2016/17. The Council is not prepared to increase the current staffing budget in the short to medium term.</p>	<p>The Council has invested heavily in maintaining and expanding the food safety staff's qualifications to allow them to undertake all food safety work which is required of the Authority. This continues.</p>
<p>5.10 (iv) Ensure all authorised officers meet the training requirements set out in the Food Law Code of Practice; including training in HACCP. [The Standard – 5.4]</p>	<p>Subject to the availability of relevant training opportunities</p>	<p>Although the Authority does not agree with the Agency's position the three officers who are subject to the recommendation will receive HACCP enforcement training , as and when such training becomes available.</p>	<p>The majority of officers have received HACCP level 3 training incorporating enforcement action. The lead officer and two other officers have received RSPH level 3 HACCP training which did not include enforcement.</p> <p>Up to September 2017 no relevant training has been identified.</p>
<p>5.10 (v) Maintain records of relevant academic or other qualifications for authorised food hygiene officers. [The Standard – 5.5]</p>	<p>Completed</p>		<p>Certificates of qualifications are available for each officer bar one.</p> <p>We have received</p>

			confirmation of the individual's qualifications but the actual certificates have been lost.
7.26 (i) Ensure that food hygiene interventions/inspections are carried out at the minimum frequency specified by the Food Law Code of Practice. [The Standard -7.1]	1/1/19	<p>In an attempt to meet the minimum inspection frequencies the Unit has adopted a new method of working – undertaking inspections which incorporate both an assessment of food hygiene and food standards compliance.</p> <p>Also, the Unit will trial the use of tablets to record work out in the field. It is hoped that through this more efficient ways of working will be developed.</p>	<p>The new inspection regime is in place. The mobile working trial has yet to start but preparations are ongoing.</p> <p>Following the departure of an experienced officer the Authority is training a newly appointed officer to become a fully qualified public protection officer. The officer in question is currently inspecting low risk premises, under supervision. This work will contribute towards dealing with the inspections backlog.</p>
TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
7.26 (ii) Carry out food hygiene interventions/inspections in accordance with the Food Law Code of Practice, centrally issued guidance, and its procedures [The Standard – 7.2]	1/9/17	Following the departure of an officer a new member of staff has been appointed and will achieve full competency to undertake food safety work in due course. However, the	A training programme for staff is in place to ensure that they are competent to undertake more than one type of intervention in a food business

		service will struggle to meet the requirements in full due to a lack of resource.	The Authority has also ensured that all members of the Welfare team have received recognised training in food standards.
7.26 (iii) Fully assess the compliance of establishments in its area to the legally prescribed standards. [The Standard - 7.3]	Ongoing	Reference the previous response, the Authority has and will take steps to ensure that officers can undertake a range of interventions in different fields whilst undertaking an inspection of a business.	The unit has adopted inspection forms and working arrangements which allow officers to assess business compliance in a thorough manner. The unit's performance in this respect is regularly monitored to assess the effectiveness of the current arrangements.
7.26 (iv) Ensure that the documented procedures are reviewed and amended in relation to local procedures for AES and specific database instructions for recording approved establishments. [The Standard -7.4]	Completed		Procedures have been developed and adopted.
7.26 (v) Ensure that observations made and data obtained in the course of a food hygiene inspection are recorded in a timely manner to prevent loss of relevant information. [The Standard – 7.5]	Completed	Regular review of arrangements to ensure their effectiveness and ease of use.	New inspection forms and recording arrangements in place. Regular reviews of logged work to ensure conformance with the requirement.

7.46 (i) Ensure that food standards interventions/inspections are carried out at the minimum frequency specified by the Food Law Code of Practice. [The Standard -7.1]	1/1/18	A lack of resources is impeding our ability to meet the requirements. It is expected that the expert training staff have received will allow them to undertake the work more effectively.	New method of undertaking programmed inspections in place. Also new recording and reporting arrangements incorporated within the service procedures. The number of inspections undertaken is monitored as is the content of completed inspections forms and reports to food business operators.
TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
7.46 (ii) Carry out food standards interventions / inspections including alternative enforcement strategies and registration of establishments in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard - 7.2]	Completed + Ongoing		Service review undertaken. New procedures in place. Regular review to ensure that procedures are followed.
7.46 (iii) Assess the compliance of establishments in its area to the legally prescribed standards. [The Standard – 7.3]	Completed		New procedures in place. Performance monitoring undertaken.
7.46 (iv) Amend the AES procedures to	Completed		

provide guidance on who should undertake and review information collected during an alternative enforcement strategy [The Standard 7.4].		When the revised arrangements are followed we will be in a position to assess their effectiveness and identify any improvements required.	Procedures have been amended. No alternative enforcement has occurred since the amendments.
7.46 (v) Ensure that observations made and / or data obtained in the course of a food standards intervention/inspection are recorded in a timely manner to prevent the loss of relevant information. [The Standard – 7.5]	Completed		New recording arrangements in place. Monitored to ensure that information recorded is accurate and reflects a thorough intervention.
TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
8.8 (i) Amend its complaints procedure to include information on target response times that have been agreed for food standards complaints. [The Standard - 8.1]	Completed		The procedure has been amended. Target response times included.
8.8 (ii) Ensure that complaints received are investigated in accordance with local procedures to include target response times, taking of appropriate action and informing complainant of the outcome of completed investigations. [The Standard – 8.2]	Completed + ongoing	Further Monitoring – arrange any training deemed necessary as a result of the monitoring.	Procedure in place and monitored. Officers have been reminded of the need to keep complainants informed; again, monitoring in place to ensure compliance.
9.6 (i) Ensure it liaises with the Primary,	Completed		

Home or Originating authorities in relation to offences identified during interventions and unsatisfactory samples. [The Standard – 9.1, 9.4 & 9.6]		Further training as required – New Primary Authority arrangements are being discussed.	The requirement has been highlighted in relevant procedures. Officers of the unit have received a day of training in relation to primary authorities and the home authority principal.
11.4 (i) Ensure food hygiene and risk rating data and due inspection dates for food hygiene and food standards are correctly entered and accurately maintained on the authority's database. [The Standard – 11.1]	1/5/17	Formal reporting arrangements required	Monitoring arrangements have been trialled and are in place
TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
12.10 (i) Amend and implement its documented sampling policy to include out of hours sampling and shellfish bed sampling arrangements and ensure its sampling programme includes details in relation to shellfish bed sampling. [The Standard – 12.4]	1/5/17	Need to establish access to offices out of hours	Sampling policy amended. Three new procedures relating to shellfish sampling and processing adopted
12.10 (ii) Amend its procedures to include the procurement or purchase of	1/5/17	Establish bulk food sampling and storage arrangements	Microbiological examination and reporting of results - Shellfish

solid/frozen and liquid/bulk food for both microbiological examination and food standards analysis. With respect to microbiological examination, amend it procedure to include shellfish bed sampling and the formal notification of sampling results. [The Standard – 12.5]			procedure in place.
12.10 (iii) Take appropriate action in accordance with its Enforcement Policy where sample results are not considered to be satisfactory. [The Standard – 12.7]	Completed + ongoing	Ensure that all officers are confident in taking and processing food samples – in house training as necessary/ ongoing.	Tighter monitoring arrangements in place. All failed samples to be reported to manger. All officers have taken and processed a food standards sample over the past year.
TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
13.11 (i) Amend the procedure for investigation of sporadic cases of food related infectious disease to ensure that all notifications are investigated in accordance with centrally issued guidance and ensure that the procedure is fully implemented. [The Standard - 13.2]	Completed + ongoing	Intended to monitor a proportion of cases which fall under the revised arrangements to establish conformance with the requirement	Procedure changed and officers now investigate in accordance with current guidelines.

15.20 (i) Review and amend its enforcement policy to include details of its arrangements for ensuring compliance with food hygiene and food standards requirements in establishments where it is the food business operator and reference to the Primary and Home Authority Schemes. [The Standard – 15.1]	1/5/17	Enforcement policy in the process of being revised. The deficiencies noted will be addressed in the revised policy.	
TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
15.20 (ii) Amend its documented enforcement procedures for improvement notices, remedial action notices and detention and seizure in accordance with the Food Law Code of Practice and official guidance and document its procedure for undertaking simple cautions and prosecutions. [The Standard -15.2]	Completed	Assess the effectiveness of the procedures over time	Formal notices procedure amended in line with recommendations. Prosecution procedure for officers to follow is available
15.20 (iii) Ensure that food hygiene enforcement including Remedial Action Notices and Hygiene Improvement Notices are carried out in accordance	Completed		Revised procedures in place. Officers informed of how to produce and record notices and the need to (where possible)

with the Food Law Code of Practice, centrally issued guidance and local procedures. [The Standard - 15.3]			to forward them to a manager for comment, prior to service.
15.20 (iv) Ensure all decisions on enforcement action are made following consideration of its Enforcement Policy. The reasons for any departure from the criteria set out in the enforcement policy shall be documented. [The Standard - 15.4]	1/5/17	The revised enforcement policy and new prosecution procedure will further highlight the requirement to record the rationale behind taking enforcement action.	The need to log the reasons for taking enforcement action has been highlighted to the unit's staff.
TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
16.8 (i) Ensure that up to date food business registration forms are maintained and retrievable and that the contents of establishment files for approved premises are reviewed to ensure that they contain relevant documentation as required by Annex 10 of the Food Law Code of Practice. [The Standard – 16.1]	1/9/17	<i>Review of Approved Establishment files</i>	<i>Procedure for processing new business operational. The standard of information provided on registration forms monitored. The registration form is copied electronically into the premises record on Civica App and a paper record kept on file.</i>

16.15 (i) Ensure that food business registration forms are maintained and retrievable, that businesses are provided with reports following an intervention / inspection and that food standards reports contain all the information required by Annex 6 of the Food Law Code of Practice. [The Standard – 16.1]	Completed		<p>New procedures and recording arrangements adopted. Staff have received training.</p> <p>The standard of the information provided and that logged on the Council's database is monitored.</p> <p>The standard of reports to food business operators is also monitored.</p>
16.15 (ii) Ensure that records of food standards interventions are kept for at least 6 years. [The Standard – 16.2]	Completed		<p><i>Retention of information policy in place across the service.</i></p> <p><i>Current working arrangements should ensure conformance with this requirement.</i></p>
TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
19.10 (i) Revise and fully implement documented internal monitoring procedures to improve the qualitative assessment of the full range of food hygiene and food standards activities. [The Standard – 19.1]	1/5/17	Angen cynnal rhaglen reolaidd o fonitro bob mis / deufis ar gyfer rhai agweddau sydd ddim yn disgyn islaw mesurau perfformiad yr Uned / Gwasanaeth.	<p>Procedures in place and responsibilities highlighted.</p> <p>Unit Performance reported / scrutinized on a corporate basis every 2</p>

			<p>months rather than quarterly.</p> <p>Information previously obtained through running reports now available 'real time' via dashboard facility within the service work recording system (Civica App)</p>
<p>19.10 (ii) For food hygiene and food standards, verify its conformance with the Standard, relevant legislation, the Food Law Code of Practice, centrally issued guidance and the authority's documented policies and procedures. [The Standard – 19.2]</p>	<p>1/5/17</p>	<p>Further monitoring arrangements , specific to the Units work, not associated with corporate performance measures. To decide upon a timetable for running such reports and assessing compliance.</p>	<p>Bi-monthly formal performance reporting in place. Results scrutinised by senior management and the Council's Chief Executive. Live reports available to assess performance.</p>