

Annex 2

Action Plan for Carmarthenshire County Council

Audit Date: 21st – 25th November 2016,
1st follow up Visit: 23rd – 24th October 2019.

Audit Visit Date: 25th – 26th June 2024

Status Key

Blue	Completed
Green	Good Progress
Amber	Limited Progress
Red	No Progress

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>3.23 (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. [The Standard – 3.1]</p>	Blue	<p>2019 update: 5 specific actions listed to be included in current year SDP prior to submission</p>	<p>The Service Plan for 2024/25 included the missing information highlighted on the full audit.</p>	<p>Completed</p>
<p>3.23 (ii) Ensure the annual performance review includes all information on the previous year's performance against the food hygiene and food standards Service Plans and any specified performance targets, standards and outcomes. Ensure this review is submitted for approval to either the relevant member forum or appropriately delegated senior officer. [The Standard – 3.2]</p>	Green	<p>2019 update: 2019/20 performance to be reflected in 20/21 SDP to include required criteria</p>	<p>The review of performance against the previous year's targets, included within the Service Plan, contained some of the required information.</p>	<p>Ensure that the annual performance review within the Service Plan includes all information on the previous years' performance against the service plan and any specified performance targets, standards and outcomes including:</p> <ul style="list-style-type: none"> - an explanation for variances on service requests. - a statement relating to planned improvements for each area of variance including service requests and food sampling programmes.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
				Ensure that the performance review in the Service Plan is approved at the appropriate level in accordance with the Standard.
4.6 (i) Ensure that the adopted enforcement policy is updated with current information and references and is reviewed at regular intervals in accordance with document control procedures. [The Standard – 4.1 & 4.2]	Blue			Completed
5.9 (i) Review and amend its authorisations to ensure officers are appropriately authorised under all relevant legislation; and ensure authorisation documents for food hygiene officers are signed by a person delegated with the power to do so in accordance with the Constitution and the authority's procedure. [The Standard – 5.1]	Green	2019 update: Scheme of Delegation to be updated. Matter drawn to the attention of HoS / Legal.	Clarification around those with delegated powers provided.	Ensure that functions relating to all relevant legislation are delegated to ensure that officers are duly authorised by those with delegated powers.
5.9 (ii) Ensure the level of authorisation of all food hygiene and food standards officers is consistent with their	Blue			Completed

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
qualifications and training. [The Standard – 5.3]				
5.9 (iii) Ensure all authorised food hygiene officers meet the training requirements set out in the Food Law Code of Practice; including training in HACCP. [The Standard – 5.4]	Blue			Completed
5.9 (iv) Maintain records of all relevant academic or other qualifications for authorised food hygiene and food standards officers. [The Standard – 5.5]	Blue			Completed
6.7 (i) Amend the documented procedure for the calibration of thermometers to ensure specified tolerances are in accordance with centrally issued guidance and set-up documented procedures for the maintenance of equipment used by food hygiene and food standards services. [The Standard - 6.2]	Blue			Completed
7.26 (i) Ensure that food hygiene interventions/inspections are carried out at the minimum frequency specified by the Food	Amber	2019 update: Approval to be sought to occupy all vacant posts to	Plan in place is currently insufficient to re-align with the code.	Ensure all business establishments receive an appropriate intervention at the correct frequency.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
Law Code of Practice. [The Standard -7.1]		help target compliance with recommendation. Recruitment process started. Fully intend on occupying all vacant posts		
7.26 (ii) Carry out food hygiene interventions / inspections and approve and register establishments in accordance with the Food Law Code of Practice, centrally issued guidance and its procedures. In particular, ensure that, where applicable, intervention risk rating and follow up are undertaken consistently in accordance with the Food Law Code of Practice, centrally issued guidance, and local procedures. [The Standard – 7.2]	Blue			Completed
7.26 (iii) Fully assess the compliance of establishments in	Green	2019 update: Review inspection	Assessment processes for food hygiene	Ensure that assessments of ID marks, imported food and withdrawal and

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
its area to the legally prescribed standards. [The Standard - 7.3]		proforma for inclusion Include criteria within Monitoring forms for completeness.	interventions included a thorough assessment of HACCP and food handler training.	recall procedures are consistently made and recorded. For approved premises ensure that discussions with food handlers, incoming ID / health marks and product recall / withdrawal arrangements are consistently assessed.
7.26 (iv) Ensure that the documented procedures for interventions are reviewed to include reference to the local arrangements for red flagging, timescales for revisits and a direction to officers as to whether to take samples. Additionally, amend the documented procedure for approved establishments to include localised arrangements for undertaking interventions and the process of approval. With respect to the Alternative Enforcement Strategy Procedure, amend to include details as to the information that would trigger a	Blue			Completed

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
visit by the authority. [The Standard – 7.4]				
7.26 (v) Ensure that observations made and/or data obtained in the course of a food hygiene intervention/inspection are recorded in a timely manner to prevent the loss of relevant information. [The Standard – 7.5]	Blue	2019 update: Consider application to monitoring / review of specified data capture areas if necessary.	Observations in relation to the size, scale and scope of businesses were being recorded on the aide memoire.	Completed
7.42 (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]	Amber	2019 update: 2020/21 will strive to complete stand-alone high & medium risk visits within respective frequencies. Standards inspections now aligned with Hygiene.	Plan in place is currently insufficient to re-align with the code.	Ensure all business establishments receive an appropriate intervention at the correct frequency.
7.42 (ii) Carry out food standards interventions/inspections in accordance with the Food Law Code of Practice and centrally issued guidance to include using	Blue			Completed

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
an appropriate risk rating system. [The Standard - 7.2]				
7.42 (iii) Assess the compliance of establishments in its area to the legally prescribed standards [The Standard – 7.3]	Blue		Inspection aide memoirs included thorough assessments of presentation and labelling, quality management systems, recall and traceability and composition	Completed
7.42 (iv) Amend its interventions procedures to provide guidance on which establishments are eligible for inclusion in an alternative enforcement strategy and the process to follow should a decision be made to use this type of intervention. [The Standard 7.4]	Blue		Eligibility for AES is set out within the procedure and includes information on when an inspection should be triggered.	Completed
7.42 (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	Blue	Ref 7.26 (v)	Observations in relation to the size, scale and scope of a business's activities are being recorded.	Completed

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
prevent the loss of relevant information. [The Standard – 7.5]				
8.8 (i) Amend the food hygiene complaints procedure to include local arrangements for dealing with complaints regarding the condition of premises. [The Standard - 8.1]	Blue			Completed
8.8 (ii) Ensure that food hygiene and food standards complaints or service requests are actioned in accordance with the requirements set out in local procedures [The Standard 8.2]	Blue			Completed
11.5 (i) Ensure food hygiene and risk rating data and due inspection dates are correctly entered and accurately maintained on the authority's database. Also, ensure that only those establishments that have received a food standards inspection are recorded and rated as such on the database. [The Standard – 11.1]	Amber	2019 update: Ongoing Continue with peer review / monitoring role.	A number of data errors were identified.	Ensure checks on database continue to address remaining risk rating and due date errors.
12.10(i) Amend and implement its sampling policy for the	Blue			Completed

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>microbiological examination and chemical analysis of food in accordance with the Food Law Code of Practice and centrally issued guidance. In particular, in respect of both services, further details in respect of out of hours sampling should be included. The food standards sampling policy should include information on the notification of results to the Primary Authority and Home/Originating Authority and the policy with regards to the verification monitoring of food, special investigations and imported food. [The Standard – 12.4]</p>				
<p>12.10(ii) Amend and implement its sampling programme for the microbiological examination of food to include specific details of the number of foods to be sampled. [The Standard – 12.4]</p>	Blue			Completed
<p>12.10 (iii) Amend and implement its documented procedure for microbiological sampling of foods to include information on the specific equipment required to</p>	Blue			Completed

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
sample, the authority's storage and transport arrangements, information relating to the authority's arrangements for hot/cold, solid/frozen and liquid bulk foodstuff sampling and the authority's arrangements relating to continuity of evidence in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 12.5]				
12.10 (iv) Document and implement its procedure for the chemical analysis sampling of foods in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 12.5]	Blue			Completed
12.10 (v) Take all appropriate action in accordance with its Enforcement Policy where sample results are not considered to be satisfactory. [The Standard – 12.7]	OPEN		Remains untested as no unsatisfactory samples were available during the relevant time period for this follow up audit.	Take appropriate action where food standards samples are unsatisfactory.
13.10 (i) Amend its Outbreak Plan to include local contacts and details of neighbouring	Blue			Completed

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
authorities and other agencies that have a role in the control of outbreaks. [The Standard -13.1]				
13.10 (ii) Amend the procedure for investigation of sporadic cases of food related infectious disease to ensure that all notifications, including Campylobacter, are investigated in accordance with centrally issued guidance. Ensure that the procedure is fully implemented to include investigation of and follow-up of all notifications. [The Standard - 13.2]	Red	2019 update: Introduce a second follow up letter for completeness.	Outstanding actions from previous follow up audit remain the same.	Further amend the procedure to ensure that where a postal questionnaire is used and either not returned or partially returned, that an attempt is made to complete the investigation.
15.28 (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 ensure it is approved by the appropriate	Red	2019 update: Food Enforcement Policy to be included as appendix at next Enforcement Group.	Outstanding actions from previous follow up audit remain the same.	Ensure the food safety enforcement policy includes details of its arrangements for ensuring compliance with food hygiene and food standards requirements in establishments where it is the food business operator and ensure is also approved.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
member forum. [The Standard – 15.1]				
15.28 (ii) Include in its enforcement procedures for Remedial Action Notices, Hygiene Improvement Notices, Hygiene Emergency Prohibition Notices, voluntary closures and detention of food, details of local arrangements, specifically; method and record of service, checks on compliance, and the use of approved templates. It should also include in its Seizure and Detention procedure details of local arrangements, specifically; the use and requirement of associated notices and documents and the local arrangements for bringing foods before a justice of the peace and the destruction and disposal of food. [The Standard - 15.2]	Blue			Completed
15.28 (iii) Set up documented enforcement procedure for follow up and enforcement actions for imported food in accordance with the Food Law Code of Practice	Blue			Completed

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
and official guidance. [The Standard -15.2]				
15.28 (iv) Ensure that food law enforcement is carried out in accordance with its procedures, the Food Law Code of Practice, official guidance and centrally issued guidance. [The Standard – 15.2 & 15.3]	Green	<p>2019 update: Templates amended. Address included on IN. Proof of service forms re-circulated.</p> <p>Consideration to enhance enforcement procedure</p>	<p>There was some improvement to enforcement processes.</p> <p>Elements of this recommendation remains untested as there were, no certifications of food and no prosecutions or Simple Cautions undertaken during the relevant time period for this follow up audit.</p>	<p>Ensure that signed copies of Hygiene Improvement Notices are available, and that proof of service is recorded.</p> <p>For Voluntary Surrender, ensure that there is a record of the destruction, signed by the Officer.</p> <p>For Certification, ensure that records relating to how the food was dealt with and the outcome are retained.</p> <p>For prosecution and Simple Caution files, ensure that files are fully worked up including witness statements and that details are provided for the roles of investigating officer, officer in charge, disclosure officer and prosecuting officer (which must accord with the Scheme of Delegation of Powers).</p>
15.28 (v) Ensure its Enforcement Policy is implemented and all decisions on enforcement action are documented and are made following consideration of the	Green	2019 update: Prosecution template caters for inclusion of	Enforcement decisions related to escalating enforcement from unsatisfactory	Ensure that decisions on Simple Cautions and prosecutions are made in accordance with the Policy.

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
<p>enforcement policy. Document the reasons for any departure from the criteria set-out in the Enforcement Policy. [The Standard – 15.1 & 15.4]</p>		<p>stipulated requirements</p>	<p>samples, hygiene improvement notices and remedial action notices were in accordance with Policy.</p> <p>Elements of this recommendation remains untested as there were no prosecutions or simple cautions taken place in the relevant time period for this follow up audit.</p>	
<p>16.8 (i) Maintain up to date accurate records of all food establishments in its area in accordance with the Food Law</p>	<p>Red</p>	<p>2019 update: Will amend process if necessary.</p>	<p>Outstanding actions from previous follow up audit remain the same.</p>	<p>Ensure that food registration forms are available and that they are either date-stamped or otherwise recorded on the database.</p>

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
Code of Practice and centrally issued guidance. These records shall include reports of all interventions / inspections in accordance with Annex 6, details of infectious disease investigations and relevant registration information. The authority should also record, with reasons, any deviations from set procedure. [The Standard – 16.1]		Red file enclosures refer and require inclusion.		Ensure layout plans, location plans for equipment, water distribution plans, drainage plans and pest controls plans are consistently available on approved establishments files, along with product recall procedures.
16.13 (i) Ensure that businesses are provided with reports following an intervention and that food standards inspection report forms provided following interventions/inspections contain all of the information required by Annex 6 of the Food Law Code of Practice. [The Standard – 16.1]	Blue			Completed
19.11 (i) Revise its documented internal monitoring procedure for food hygiene to include checks on the accuracy of the database,	Blue	2019 update: Procedure to be further developed	The documented internal monitoring procedure and associated template	Completed

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
checks on officer authorisations and checks on records of investigations into infectious disease notifications. Fully implement food hygiene and food standards procedures to ensure other service delivery activities in addition to inspection file records are also subject to internal monitoring. [The Standard – 19.1]		Role to be administered by senior position currently unoccupied.	forms have been revised to include minimum frequency of checks such as inspections and service requests and a pro-forma has been developed to be completed during accompanied visits. Officer feedback has been included and is recorded on internal monitoring forms.	
19.11 (ii) 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 for food hygiene and food standards. [The Standard – 19.2]	Blue			Completed
19.11 (iii) Ensure records are made of all food standards internal monitoring, including the nature	Blue	Ref 19.11 (i)	Officer feedback is being recorded and	Completed

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
and extent of the monitoring activity and that these are kept for at least two years. [The Standard – 19.3]			delivered following internal monitoring.	
20.7 (i) Implement effective remedial actions to address all non-conformances raised from the 2014 Shellfish Traceability and Authenticity Exercise and 2014 audit of official hygiene controls at dairy establishments. [The Standard – 20.2]	Blue			Completed
Food Hygiene Rating Scheme audit actions relating to service planning.	Blue		Service plan contains relevant information relating to FHRS interventions.	Completed
Food Hygiene Rating Scheme audit actions relating to database calculations.	Amber		A number of data errors were identified.	Ensure intervention due dates are calculated correctly and that confidence in management and significant risk scores are consistent. Ensure that inspections due are completed in accordance with the Code of Practice.
Food Hygiene Rating Scheme audit actions relating to procedures.	Blue		Procedures relating to FHRS audit have been amended.	Completed

RECOMMENDATION	STATUS	PLANNED IMPROVEMENTS	PROGRESS TO DATE	OUTSTANDING
Food Hygiene Rating Scheme audit actions relating to intervention reports.	Blue		Reports issued with safeguards information.	Completed
Food Hygiene Rating Scheme audit actions relating to internal monitoring.	Blue		Internal monitoring checks relating to safeguards are carried out.	Completed

Summary

Total Recommendations	44
Completed	31
Good Progress	5
Limited Progress	4
No Progress	3
Untested	1
Total Outstanding	13