

<b>Report To:</b>	<b>Education &amp; Communities Committee</b>	<b>Date:</b>	<b>10 September 2013</b>
<b>Report By:</b>	<b>Corporate Director Education, Communities &amp; OD</b>	<b>Report No:</b>	<b>EDUCOM/69/13/MM</b>
<b>Contact Officer:</b>	<b>Martin McNab</b>	<b>Contact No:</b>	<b>714246</b>
<b>Subject:</b>	<b>Official Food and Feed Controls Service Plan 2013-14</b>		

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## **1.0 PURPOSE**

- 1.1 The purpose of this report is to advise the Committee of the Official Feed and Food Service Plan for 2013/14 and to report on the achievements of the service in 2012/13.

## **2.0 SUMMARY**

- 2.1 Councils are required under the Framework Agreement on Official Feed and Food Controls by Local Authorities to publish an annual Service Plan documenting how they will deliver the service.
- 2.1 Authorities were formerly required to seek committee approval for the plan but in recent years there has been flexibility in this requirement as reports were often for noting rather than requiring any actual committee decision.
- 2.2 As 2012-13 was the first year of the Service's implementation of the FSA's cross contamination guidance resulting in a significant change in the inspection programme, there was an undertaking to update committee on progress.

## **3.0 RECOMMENDATIONS**

It is recommended that the Committee

1. Approves the Official Food and Feed Service Plan for 2013/14
2. Notes the delivery against the 2012/13 Plan

**Albert Henderson**  
**Corporate Director Education, Communities & Organisational Development**

## **4.0 BACKGROUND INFORMATION**

- 4.1 The Official Feed and Food Controls Service Plan is a requirement of the Framework Agreement on Official Feed and Food Controls by Local Authorities. The Framework Agreement sets out what the Food Standards Agency expects from local authorities in their delivery of official controls on feed and food law. In addition to covering service planning the Framework Agreement also sets out delivery requirements and the monitoring and audit arrangements.
- 4.2 The Food Standards Agency is the UK's Central Competent Authority for Feed and Food Controls; however the bulk of delivery of controls is carried out by local authorities. The Framework Agreement therefore provides a basis for monitoring and audit of local authorities' delivery of these controls by the FSA.
- 4.3 The Service Plan addresses various aspects of service delivery under a number of headings specified by the Food Standards Agency.
- 4.4 Key aspects of the plan include
- \* Service Aims and Objectives
  - \* Background
  - \* Service Delivery
  - \* Resources
  - \* Quality Assessment
  - \* Review
- 4.5 This report details some of these key aspects together with a review of performance against the 2012/13 plan.

## **5.0 THE 2013/14 SERVICE PLAN**

- 5.1 The 2013/14 Service Plan projects a total of 433 food hygiene inspections to be completed under the programme to introduce the cross-contamination guidance. This estimate is based upon experience from the first year of implementation 2012/13. As in 2012/13 the programme of inspections for food standards is largely suspended but we will continue to react to issues of national and local importance as was the case with the horsemeat incident in early 2013.
- 5.2 The service plan remains, for the time being, a combined food and feed service plan. It is hoped however to develop a more meaningful plan for animal feed in the course of the year.

## **6.0 Performance Against The 2012/13 Service Plan**

- 6.1 The 2012/13 Service Plan projected a total of 359 food hygiene inspections. In the event a total of 375 visits were carried out. There was however significant variance between the original inspection profile and that delivered. The main reasons for this were:
- The initial programme assumed a start date of the cross contamination visits in early June. In the event due to some issues about the interpretation of parts of the FSA guidance the programme did not commence until well into July 2012.

- How well food businesses would engage with the guidance was unknown at the outset. The initial programme assumed a clear process of engagement – revisit – enforcement. In the event officers found that for the bulk of premises a more educative approach was helpful in securing compliance. Most businesses made significant progress and continuing with this approach was more helpful than progressing to service of notices at an early stage. That having been said, officers are now more confident that a consistent approach has been found and a number of remedial action notices are now being served where progress is not being made.

6.2 The performance of the food service is measured by two KPIs which are reported to the FSA. The first of these is the percentage of premises “Broadly Compliant” with food law. In Inverclyde this was 87% in 2012/13, broadly comparable with 86.4% in 2011/12. It would not have been unexpected should this have dropped as a result of the implementation of the cross contamination guidance so the fact that it has been maintained at this level is very welcome.

6.3 The second KPI is the percentage of food hygiene interventions due at 1 April achieved. Guidance was sought from the Food Standards Agency as to how this should be reported for 2012-13. Two approaches were open to us, firstly to report against the original risk based programme; this would result in a significant drop from previous years as the implementation of the cross contamination programme resulted in a significant number of inspections being suspended with the agreement of FSA. The percentage of inspections achieved under this measure was 72%. The second option was to report the more meaningful figure of the percentage of inspections achieved taking account of the revised programme. This would have given us a figure of 99.8%. Guidance from the FSA was to report the former although internally the latter figure is a more useful measure of the achievement of the Service against the Service Plan in 2012-13.

## **7.0 IMPLICATIONS**

### 7.1 Finance

There are no financial implications arising from this report.

### 7.2 Personnel

There are no personnel implications arising from this report.

### 7.3 Legal

There are no legal implications arising from this report.

### 7.4 Equalities

none

## **8.0 Background Papers**

### 8.1 1. Official Food and Feed Controls Service Plan – Inverclyde 2013/14

## Inverclyde Council Official Feed and Food Controls Service Plan 2012/13

### 1. Service Aims and Objectives

<p>1.1 Aims and Objectives</p>	<p>The aims of the Inverclyde Council's Safer &amp; Inclusive Communities Service in relation to Food and Feed Control are</p> <ul style="list-style-type: none"><li>• To carry out a risk based inspection programme for higher risk premises and to continue the roll out of the FSA's cross contamination guidance to all affected food businesses commenced in 2012/13.</li><li>• To work with local businesses in as open and transparent a manner as possible in order to help them where necessary, improve the safety of food and level of compliance with relevant legislation.</li><li>• To respond efficiently to complaints about food quality, food premises, food labelling or food composition, originating from premises or purchases made within Inverclyde.</li><li>• To play a full role in the West of Scotland Food Liaison Group and to co-operate in full with the Scottish Food Enforcement Liaison Committee, the Food Standards Agency Scotland and The Royal Environmental Health Institute of Scotland to improve consistency and best practice in the role of food enforcement among Scottish local authorities.</li><li>• To continue to provide advice and guidance on all food safety matters to the businesses of Inverclyde.</li><li>• To ensure the safety and compliance of feeding stuffs in Inverclyde in line with the Code of Practice to reduce the risk arising to animal and human health.</li></ul>
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<p>1.2 Links to corporate objectives and plans</p>	<p>In carrying out the above effectively the service will contribute to the following wellbeing outcomes for Inverclyde's Citizens from the Inverclyde Alliance's Single Outcome Agreement 2012-17</p> <p><b>Safe</b>            Protected from abuse, neglect or harm and supported when at risk. Enabled to understand and take responsibility for actions and choices. Having access to a safe environment to live and learn in.</p> <p><b>Healthy</b>        Achieve high standards of physical and mental health and equality of access to suitable health care and protection, while being supported and encouraged to make healthy and safe choices.</p>
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## 2. Background

<p>2.1 Profile of the Local Authority</p>	<p>Inverclyde covers an area of 61 square miles stretching along the south bank of the estuary of the River Clyde. Inverclyde is one of the smaller local authorities in Scotland. The main towns of Greenock, Port Glasgow and Gourock sit on the Firth of Clyde. The towns provide a marked contrast to the coastal settlements of Inverkip and Wemyss Bay, which lie to the south west of the area, and the villages of Kilmacolm and Quarrier's Village which are located further inland.</p> <p>Demographic trends have shown a marked decrease in population in recent years with the majority of those leaving being young. Overall this is likely to result in a far higher proportion of over 60s in the population in the future. Inverclyde also has substantial areas of deprivation.</p> <p>In the 2012 Scottish Index of Multiple Deprivation 14 (12.7%) of Inverclyde's 110 datazones were in the 5% most deprived datazones in Scotland.</p>
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<p>2.2 Organisational Structure</p>	<p>The food &amp; feed service is part of the Food &amp; Health Team with responsibilities as follows:</p> <div style="text-align: center;"> <div data-bbox="569 261 1715 334" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;">Corporate Director Education &amp; Communities – Albert Henderson</div> <div style="text-align: center;">↓</div> <div data-bbox="569 380 1715 453" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;">Head of Safer &amp; Inclusive Communities – John Arthur (Head of Food Service)</div> <div style="text-align: center;">↓</div> <div data-bbox="569 524 1715 597" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;">Health Protection Manager – Martin McNab (Lead Officer Food Safety &amp; Standards)</div> <div style="text-align: center;">↓</div> <div data-bbox="569 643 1715 716" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;">Food &amp; Health Team Leader – Michael Lapsley</div> <div style="text-align: center;">↓</div> <div data-bbox="569 761 1715 834" style="border: 1px solid black; padding: 5px;">Roisin Dillon Senior TSO (Lead Officer Feed)</div> </div> <p>As can be seen from the above Safer &amp; Inclusive Communities is part of the Education &amp; Communities Directorate reporting to the Education &amp; Communities Committee.</p>
<p>2.3 Scope of the Feed and Food Service</p>	<p>The Food and Health Team within Safer Communities is responsible for delivering all aspects of Food Safety and Standards enforcement within Inverclyde. The team also has responsibility for Trading Standards (including Animal Feed), Port Health, Infectious Disease Control, Animal Health and Private Water Supplies.</p> <p>The Food &amp; Health Team consists of a Team Leader, two Environmental Health Officers (both also working with the Environment &amp; Safety Team), a Food Safety Officer, a Senior Trading Standards Officer and a Trading Standards Officer.</p> <p>With the exception of the Trading Standards staff all are involved in Food Safety and Standards enforcement. The TSOs are involved in feed enforcement. Two further EHOs from other teams in the service contribute to food enforcement.</p>

<p>2.4 Demands on the Feed and Food Service</p>	<p>Within Inverclyde at 1st April 2013 there were 678 food premises of various types and sizes over which it has enforcement responsibility.</p> <p>This includes 2 premises approved under product specific legislation giving each of these businesses a unique Approval Number. Both are involved in meat products production with one producing meat preparations.</p> <p>Of the 678 premises by classification on 1 April 2013 there are 3 primary producers, 16 manufacturers/packers, 9 distributors, 166 retailers, 168 restaurants &amp; caterers, 99 caring establishments, 13 hotels/guest-houses, 24 mobile food units, 82 pubs/clubs, 64 take-aways and 33 schools/colleges.</p> <p>The food service is delivered from 40 West Stewart Street in Greenock and operates during normal working hours Monday to Friday. In the event of a food related emergency senior members of Safer Communities' staff are contactable out of hours. Contact numbers are available to both the FSAS and Greater Glasgow &amp; Clyde Health Board.</p> <p>There are no significant additional external factors impacting on the service. The percentage of business owners whose first language is not English is no greater than average. The number of manufacturers is small and, although Greenock has a busy port, at present no food or feed is imported.</p> <p>Possibly the most significant factor which could affect the authority's ability to deliver its food and feed control programme is the relatively small size of the service. This means that a large outbreak or event could have a disproportionate effect on the service. There is an agreement between the authorities constituting the Strathclyde Emergency Co-ordinating Group (SECG) to provide mutual aid however which should mitigate the effects of any such event.</p>
<p>2.5 Regulation Policy</p>	<p>The Food Service currently operates in line with a Food Safety Enforcement Policy to ensure that compliance with food law is achieved in a proportionate, transparent and consistent manner. The Enforcement Policy was revised in 2012 to take into account the new enforcement powers available to the service (Remedial Action Notices) and the impact of the agreement between the Scottish Food Enforcement Liaison Committee (SFELC) and the Food Standards Agency Scotland (FSAS) on cross contamination.</p>

### 3. Service Delivery

<p>3.1 Interventions at Food and Feeding stuffs establishments</p>	<p>The programme of food hygiene inspections for 2013-15 is attached below. The plan should be read in conjunction with Section 6.1 Review Against the Service plan which gives context by detailing performance in 2012-13. The full reasons for the programme and which premises will be exempt from inspection for this period are detailed in Appendix 1 to the Council's Food Law Enforcement Policy.</p> <p>As was the case in 2012-13 the figures below are very provisional and it is expected that there will be significant variance. The projection of the programme into 2014-15 is done to indicate that, at current rate of progress, we should complete in the course of 2014-15 and be able to resume a modified risk based programme fully in 2015-16.</p> <p>Food Standards</p> <p>For the period covered by the revised inspection plan it is assumed that food hygiene inspections will be very much focussed on cross contamination issues, with the exception of inspections of category A and B food premises where the guidance does not apply. In Inverclyde food standards inspections are frequently carried out in concert with food hygiene inspections. In order to remain consistent in respect of risk, any Category A and B food standards inspections will be carried out. Category C food standards inspections will not be carried out for the duration of this policy. Complaints and investigations will be carried out as normal however and any food standards issues which come to light which have particular importance in relation to risk to consumers, e.g. unlabelled allergens likely to provoke a serious adverse reaction, will be dealt with appropriately.</p>
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**Proposed Inspection Programme 2013-15**

	<i>2013-14</i>	<i>2014-15</i>
<i>Programmed A&amp; B &amp; Vulnerable C</i>	<i>132</i>	<i>132</i>
<i>Projected secondary visits</i>	<i>30</i>	<i>10</i>
<i>Projected Enforcement Visits</i>	<i>10</i>	
<i>High Risk C Visits</i>	<i>12</i>	
<i>Projected Secondary</i>	<i>20</i>	
<i>Projected Enforcement Visits</i>	<i>5</i>	
<i>Medium Risk C</i>	<i>39</i>	
<i>Projected Secondary)</i>	<i>30</i>	
<i>Projected Enforcement Visits</i>	<i>5</i>	
<i>Low Risk C</i>	<i>25</i>	<i>62</i>
<i>Projected Secondary</i>	<i>10</i>	<i>40</i>
<i>Projected Enforcement</i>	<i>N/A</i>	<i>15</i>
<i>Inspections of Unrated/New</i>	<i>30</i>	<i>30</i>
<i>Revisits</i>	<i>25</i>	<i>25</i>
<i>Other visits (advice, surveillance)</i>	<i>60</i>	<i>60</i>
<i>Total Inspections</i>	<i>433</i>	<i>374</i>
<i>Total Officer Visits)</i>	<i>568</i>	<i>464</i>

<p>3.2 Feed and Food Complaints</p>	<p>The food service deals with a varying number and type of food complaints from both members of the public about locally purchased food and from other enforcement authorities regarding locally produced food.</p> <p>All complaints are handled in line with our documented policy and are thoroughly investigated. The majority of complaints do not result in formal action; however they maybe referred to the procurator fiscal in accordance with the Enforcement Policy.</p> <p>Last year the service dealt with 41 complaints of which 24 related to the hygiene of food premises.</p>
<p>3.3 Home Authority Principle and Primary Authority Scheme</p>	<p>At present Inverclyde Council has formal Home Authority agreements with two businesses based in the area. Informal arrangements however exist with a number of other businesses and we would always seek to respond to all enforcing authority questions on food produced and labelled within Inverclyde in accordance with our enforcement policy.</p>
<p>3.4 Advice to Business</p>	<p>The food service is proactive in advising businesses in the course of normal contacts. It is also happy to visit sites of proposed businesses on request to advise on layout and structural finishes. The service operates an open door policy and is happy to advise on any food related matters including labelling.</p> <p>Initial focussed inspections for cross contamination will be largely based on advice to businesses with formal enforcement only introduced where this has not been taken on board.</p>
<p>3.5 Feed and Food Sampling</p>	<p>Inverclyde participates in sampling programmes instituted by a number of bodies, such as the West of Scotland Food Liaison Group.</p> <p>All of the analysis is carried out by Glasgow Scientific Services which is a NAMAS accredited laboratory.</p> <p>Inverclyde has a documented policy for sampling. An annual sampling programme is produced as part of the policy.</p> <p>The chemical samples included food samples, food complaints and radiation samples. Sampling is carried out to monitor food poisoning incidents, complaints, manufacturing processes and general hygiene trends. It is strongly based on locally produced foods.</p>

	<p>Although Inverclyde has a major port in the Greenock Ocean Terminal, at the time of writing there is no food imported to the UK through the port. Were this to change a significant amount of our sampling effort would be redirected to address this.</p> <p>In 2012/13 approx 34 food samples were taken for bacteriological quality and 116 for composition.</p> <p>Annual sampling for feed is carried out in accordance with a planned programme devised jointly by the authorities in the West of Scotland.</p>
<p><b>3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease</b></p>	<p>The Food Section liaises with Greater Glasgow &amp; Clyde Health Board through the Consultant in Public Health Medicine in the investigation of food poisoning incidents within Inverclyde. A protocol is in place dealing with the investigation of isolates. In case of a major outbreak an outbreak control plan is in place.</p> <p>A major outbreak of food poisoning would inevitably have a long term impact on the day to day work of the section given the relatively low staff numbers. Mutual aid agreements with other authorities in SECG should mitigate the effects of this.</p>
<p><b>3.7 Feed/Food Safety Incidents</b></p>	<p>Inverclyde is part of an electronic alert system operated by Food Standards Agency Scotland. Contact can be made with the Head of Service or Service Managers on a 24 hour basis. The Food Section is committed to fully implement the Code of Practice with regard to food safety incidents. Incoming Food Alerts are automatically cascaded to all members of the team.</p>

<p>3.8 Liaison with Other Organisations</p>	<p>To ensure that enforcement action taken by Inverclyde's Food Section is consistent with those of neighbouring authorities, the Food Section is involved with the following organisations; the West of Scotland Food Liaison Group which represents 14 of Scotland's 32 authorities and includes representatives from Glasgow Scientific Services; through the liaison group with the Scottish Food Enforcement Liaison Committee (SFELC) and the Food Standards Agency. Direct liaison between the section and the FSA takes place as required.</p> <p>The Trading Standards section liaises with other authorities through participation in SCOTSS (Society of Chief Officers of Trading Standards in Scotland) and its appropriate sub-groups.</p> <p>There is close Liaison with Greater Glasgow &amp; Clyde Health Board and the other authorities in its area at the Public Health (Health Protection) Liaison Working Group. This group include representatives from Animal Health, SEPA, Scottish water and Health Protection Scotland.</p>
<p>3.9 Feed and Food Safety and Standards promotional work, and other non-official controls interventions</p>	<p>The ongoing implementation of the FSA cross contamination guidance in 2013/14 means that there will be very little resource available for additional promotional work or non-official interventions. Obviously should there be a perceived need it will be considered on its merits within these constraints.</p>

#### 4. Resources

<p>4.1 Financial Allocation</p>	<p>Staffing Costs for 2013/14 - £130,000 (including approx £7,000 for admin support)</p> <p>Travel &amp; Subsistence - £800 (estimated)</p> <p>IT – There was substantial investment in a new back office system in 2008/09 (approx £80,000 of which the food safety element would have been approx £25,000) subsequently Food &amp; Feed enforcement's share of annual licence fees is estimated at £2,000 per annum.</p> <p>Sampling – Overall the Service spent approx £78,000 on sampling in 2012/13 of which approximately 56% or £44,000 was spent on food &amp; feed sampling. Spend in 2013/14 is projected to be similar.</p> <p>Other costs including property costs, printing etc. estimated at £10,000.</p>
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	No growth is expected in 2013/14 beyond any incremental increase in salary costs so the estimated cost of the service in 2013/14 is approximately £186,000.
4.2 Staffing Allocation	<p>At the time of writing there are a total of 2.6 qualified FTEs working in the Food &amp; Feed. These are made up of a proportion of the working time of 8 staff in total. Of those 8, 4 are authorised at the highest level (to serve EPN/HEPN, RAN etc) and 3 at a medium level (service of IN/HIN etc). One is fully authorised as the lead officer for feed.</p> <p>A further 0.2 FTEs contribute to the service as support staff.</p>
4.3 Staff Development Plan	All staff members attend external events for CPD as far as availability allows. Being a relatively small service, staff CPD in food & feed enforcement can largely be gained through a combination of FSA low cost training events and internal staff development e.g. consistency exercises. Full records are kept of staff training and these are reviewed regularly to ensure that staff with a need to attend particular courses (e.g. FSA HACCP auditing etc.) are identified and given preference when places become available.

## 5. Quality Assessment

5.1 Quality assessment and internal monitoring	<p>The Food Section currently has a system for monitoring the quality of food hygiene inspection. These are reviewed on a regular basis to take account of any changes in external factors, e.g. Code of Practice requirements.</p> <p>As a small authority, the use of a formal quality system is considered to require a disproportionate amount of officer time and expense to achieve any benefit.</p>
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## 6. Review

<p>6.1 Review against the Service Plan</p>	<p>Details of performance against this plan will be included in the plan for 2014-15. Performance against the 2012-13 plan is detailed below.</p> <p>Performance against the programme 2012/13:</p> <p>The agreement between SFELC and FSAS allows local authorities in Scotland to change their enforcement priorities and programmes for a period of three years to allow the FSA's Cross Contamination Guidance to be introduced. The first year of this programme in Inverclyde was 2012-13. An initial 3 year inspection programme was included in the 2012-13 Service Plan. This programme was based on officers' knowledge of the premises in Inverclyde and contained a number of assumptions around likely revisit rates and estimates of the number of premises likely to significantly change risk rating following the implementation of the programme. The original 2012-13 programme is shown below together with the actual inspections carried out. The original programme contained a number of assumptions which were reflected in the estimates of visits to be made in the year, in the event there were significant variances in how the inspection programme was structured and carried out but relatively little variance in overall burden of visits. The main reasons for the variances were:</p> <ul style="list-style-type: none"><li>• The initial programme assumed a start date of the cross contamination visits in early June. In the event due to some issues about the interpretation of parts of the FSA guidance the programme did not commence until well in to July 2012</li><li>• How well food businesses would engage with the guidance was unknown at the outset. The initial programme assumed a clear process of engagement – revisit – enforcement. In the event officers found that for the bulk of premises a more educative approach was helpful in securing compliance, most businesses made significant progress and continuing with this approach was more helpful than progressing to service of notices at an early stage. That having been said officers are now more confident that a consistent approach has been found and a number of remedial action notices are now being served.</li></ul>
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	<i>June 2012 – Mar 2013 Programme</i> *All figures are estimates	<i>Actual Inspections April – July 2012 (pre Programme)</i>	<i>Actual July – March 2012-13</i>
<i>1. Programmed A&amp; B Inspections</i>	130	26	55
<i>2. Secondary visits</i>	91	N/A	44
<i>3. Enforcement Visits</i>	46	N/A	N/A
<i>4. High Risk C Visits</i>	50		95
<i>5. Secondary</i>	30		87
<i>6. Enforcement Visits</i>	12		N/A
<i>7. Programmed Inspections C</i>		1	5
<i>8. Inspections of Unrated/New businesses</i>		16	31
<i>Revisits</i>		16	10
<i>Other visits (e.g. advice, surveillance etc. )</i>		18	48
<i>Total Inspections</i>	359	77	375
<i>Total Officer Visits (Secondary &amp; Enforcement requiring 2)</i>	538	77	500 (approx)

As detailed in the food standards programme for 2012-13 the focus in the year was very much on cross contamination visits. Food standards visits in the year were largely carried out in response to national

	issues and intelligence rather than as a result of the risk based inspection programme. Obviously the most notable such incident in 2012-13 was the horse meat contamination of meat products. A number of visits were made resulting from this but there were no issues found in Inverclyde.
6.2 Identification of any Variation from the Service Plan	The Team Leader Food and Health will identify any variance from the plan and identify the reasons e.g. large food poisoning outbreak or national food crisis.
6.3 Areas of Improvement	Where a review of the service plan highlights an area for improvement this will be incorporated in the plan for the following year.