

Report on the Audit of Local Authority Food Law Service Delivery and Food Business Compliance

Bedford Borough Council
30 September - 1 October 2014



Foreword

Audits of local authorities' feed and food law enforcement services are part of the Food Standards Agency's (FSA) arrangements to improve consumer protection and confidence in relation to food and feed. These arrangements recognise that the enforcement of UK food and feed law relating to food safety, hygiene, composition, labelling, imported food and feeding stuffs is largely the responsibility of local authorities. These local authority regulatory functions are principally delivered through their Environmental Health and Trading Standards Services.

The attached audit report examines the Local Authority's Food Law Enforcement Service. The assessment includes the local arrangements in place for database management, inspections of food businesses and internal monitoring. It should be acknowledged that there will be considerable diversity in the way and manner in which local authorities may provide their food enforcement services reflecting local needs and priorities.

Agency audits assess local authorities' conformance against the Food Law Enforcement Standard ("The Standard"), which was published by the Agency as part of the Framework Agreement on Official Feed and Food Controls by Local Authorities and is available on the Agency's website at:
www.food.gov.uk/enforcement/auditandmonitoring.

The main aim of the audit scheme is to maintain and improve consumer protection and confidence by ensuring that local authorities are providing an effective food law enforcement service. The scheme also provides the opportunity to identify and disseminate good practice and provide information to inform Agency policy on food safety, standards and feeding stuffs. Parallel local authority audit schemes are implemented by the Agency's offices in all devolved countries comprising the UK.

The report contains some statistical data, for example on the number of food premises inspections carried out annually. The Agency's website contains enforcement activity data for all UK local authorities and can be found at:
www.food.gov.uk/enforcement/auditandmonitoring.

For assistance, a glossary of technical terms used within the audit report can be found at Annex C.

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1.0 Introduction

- 1.1 This report records the results of an audit at Bedford Borough Council with regard to food hygiene enforcement, under relevant headings of the Food Standards Agency Food Law Enforcement Standard. The audit focused on the Authority's arrangements for the management of the food premises database, food premises interventions, and internal monitoring. The report has been made available on the Agency's website at: www.food.gov.uk/enforcement/auditandmonitoring/auditreports. Hard copies are available from the Food Standards Agency's Operations Assurance Division at Aviation House, 125 Kingsway, London WC2B 6NH, Tel: 020 7276 8428.

Reason for the Audit

- 1.2 The power to set standards, monitor and audit local authority food law enforcement services was conferred on the Food Standards Agency by the Food Standards Act 1999 and the Official Feed and Food Controls (England) Regulations 2009. This audit of Bedford Borough Council was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme.
- 1.3 Regulation (EC) No. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law includes a requirement for competent authorities to carry out internal audits or to have external audits carried out. The purpose of these audits is to verify whether official controls relating to feed and food law are effectively implemented. To fulfil this requirement, the Food Standards Agency, as the central competent authority for feed and food law in the UK has established external audit arrangements. In developing these, the Agency has taken account of the European Commission guidance on how such audits should be conducted.¹
- 1.4 The Authority was selected for inclusion in the Food Standards Agency's programme of audits of local authority food law enforcement services because the food hygiene service had not been subject to a core, service compliance audit in the last five years.

¹ Commission Decision of 29 September 2006 setting out the guidelines laying down criteria for the conduct of audits under Regulation (EC) No. 882/2004 of the European Parliament and of the Council on official controls to verify compliance with feed and food law, animal health and animal welfare rules (2006/677/EC).

Scope of the Audit

- 1.5 The audit examined Bedford Borough Council's arrangements for food premises database management, food premises interventions and internal monitoring, with regard to food hygiene law enforcement. This included a reality check at a food business to assess the effectiveness of official controls implemented by the Authority at the food business premises and, more specifically, the checks carried out by the Authority's officers to verify food business operator (FBO) compliance with legislative requirements. The scope of the audit also included an assessment of the Authority's overall organisation and management, and the internal monitoring of food hygiene law enforcement activities.
- 1.6 Assurance was sought that key Authority food hygiene law enforcement systems and arrangements were effective in supporting business compliance, and that local enforcement was managed and delivered effectively. The on-site element of the audit took place at the Authority's offices at the Borough Hall, Cauldwell Street, Bedford. MK42 1AP on 30 September – 1 October 2014.

Background

- 1.7 The town of Bedford is situated in the east of England, in the county of Bedfordshire. Bedford Borough covers an area of 476 sq. km and is home to approximately 161,400 people (mid 2013). Almost two-thirds of the population (64.2%) live in the large urban areas of Bedford and Kempston, with 35.8% living in the surrounding rural area which is made up of 45 small parishes.
- 1.8 In 2009, the county council was abolished and Bedford Borough Council was created as a unitary authority. Bedford Borough is one of the most ethnically diverse authorities in the East of England, with up to 100 different ethnic groups living within its boundaries.
- 1.9 The area contains a wide mix of food business establishments, including a small number of manufacturers, some of which require approval under Regulation (EC) No. 853/2004.
- 1.10 Food hygiene law enforcement was the responsibility of the Commercial Regulation Team, within Regulatory Services which formed part of the Environment and Sustainable Communities Directorate. Other key activities carried out by the team include inspection of health and safety at commercial premises, investigations of infectious disease notifications, accidents and licensing. Trading Standards enforcement also fell under the remit of the Service.

1.11 The Authority reported the profile of Bedford Borough Council's food businesses as of 31 March 2014 as follows:

Type of Food Premises	Number
Primary Producers	21
Manufacturers/Packers	21
Importers/Exporters	1
Distributors/Transporters	25
Retailers	284
Restaurant/Caterers	1,077
Total Number of Food Premises	1,429

2.0 Executive Summary

2.1 The Authority was selected for audit as it had not received a core, service compliance audit of its food hygiene service in the previous five years, although the Authority had participated in a one day visit on its implementation of the FSA's E- coli O157 guidance in 2012.

2.2 The Authority had been through a number of changes in recent years, with the newly formed unitary authority taking effect from 2009 and the merging of services which followed. In addition, the Authority had introduced a new system of mobile working which had been rolled out with some success over the past 18 months.

2.3 Strengths:

Officer training and competency: From audit evidence obtained and discussion with officers it was clear that officers carrying out interventions were competent, experienced and knowledgeable. Officers had generally received a good range of training necessary for their role.

Mobile working: The Authority had rolled out a system of mobile working across the whole of Regulatory Services. This appeared to be working well with positive feedback from officers and managers. Although still in its infancy, the Authority reported that the benefits of the new system are already being felt with more time available to focus on the delivery of the core food service.

2.4 Key areas for improvement:

Service Plan: Whilst the Food Service Plan outlined the staff numbers in FTE terms, allocated to the food safety, food standards and feed enforcement functions it would benefit from a clear comparison of the resource required to carry out the full range of statutory food law enforcement activities against the resources available to the Service. In addition, it is important to also capture how any shortfall will be addressed, where relevant each year.

Authorisation of Officers: Officer authorisations needed review to ensure that they reflected the full range of officer qualifications and competencies.

Internal Monitoring: The current system of qualitative and quantitative internal monitoring should be reviewed and expanded to ensure that approved establishments, inspection records and correspondence was in full compliance with the Authority's own documented policies and procedures.

3.0 Audit Findings

3.1 Organisation and Management

Strategic Framework, Policy and Service Planning

- 3.1.1 The Authority had developed a Regulatory Services Food and Feed Service Plan for 2014/15. The Plan helpfully set out the Service aims and objectives which had been set as part of the 2013/16 Business Plan and included focus on the Food Hygiene Rating Scheme (FHRS) and partnership working and initiatives to help improve hygiene standards in food businesses.
- 3.1.2 The Plan contained a detailed review of the previous year's work which included particular successes achieved by the Service, a summary of enforcement action taken, food hygiene interventions achieved and food safety projects undertaken. Where necessary, variances were also highlighted.
- 3.1.3 Although the structure of the Service Plan was generally in line with the format of the Service Planning Guidance in the Framework Agreement, it would benefit from the inclusion of a comparison of the staff resources required to deliver the Food Law Enforcement Service against the staff resource available. In addition, the Plan should detail any budgetary pressures that may realistically threaten delivery of the Service in accordance with the Food Law Code of Practice (FLCoP). Future service delivery should also be highlighted.
- 3.1.4 A summary of the Service Plan was submitted to the relevant Assistant Director for Environment, Regulatory and Recreational Services for approval each year. In turn, the Plan was agreed by the Relevant Portfolio Holder. This summary document would also benefit from the inclusion of key information previously mentioned.

Recommendation

3.1.5 The Authority should:

Ensure that future service plans include a clear comparison of the resource required to carry out the full range of statutory food law enforcement activities against the resources available to the Service. Details of how any shortfall will be addressed should also be provided.

[The Standard – 3.1 and 3.2]

Documented Policies and Procedures

- 3.1.6 The Authority had developed policies and procedures covering most areas within the scope of the audit. Most were reviewed annually or when legislation or centrally issued guidance changed.
- 3.1.7 The Service ensured that all policies and procedures were subject to version and document control. Procedures were stored on an electronic shared drive for officers' to use as necessary.

Officer Authorisations

- 3.1.8 The Authority had developed a suitable method of authorising officers. The Assistant Director for Environment, Regulatory and Recreational Services, had been delegated to authorise food enforcement officers through the Council constitution.
- 3.1.9 Checks on authorisation records confirmed that officers were acting within the limits of their authorisation.
- 3.1.10 Officers appeared to be specifically authorised for some key enforcement activities. For example, the authorisation documents stated that Environmental Health Officers (EHOs) could issue Hygiene Improvement Notices (HINs) and Hygiene Emergency Prohibition Notices (HEPNs). Auditors recommended expanding this list to include all other types of enforcement action that may also be relevant such as Remedial Action Notices (RANs). It was also unclear from the authorisation documents which officers could inspect and take action where necessary at approved establishments, however from discussions, officers appeared to be aware of the limitations of their authorisation.
- 3.1.11 Some key pieces of legislation mentioned in the authorisation documents required updating including the Official Feed and Food Controls (England) Regulations 2006 (now, the Official Feed and Food Control Regulations 2009 (as amended) and the Products of Animal Origin (Third Country Imports) Regulations 2006, which have been repealed and replaced by the Trade in Animals and Related Products Regulations 2011.
- 3.1.12 Officer training needs were identified in a number of ways including annual appraisals and team meetings. Officers recorded their training on a centrally held spreadsheet and maintained records individually.
- 3.1.13 Checks on training records confirmed that officers were generally meeting the Food Law Code of Practice (FLCoP) minimum 10 hours relevant training per annum based on the principles of continuing

professional development. Training records were generally comprehensive and retrievable. Officers had undertaken training in a wide range of relevant topic areas and a number had participated in specialised food courses including sous vide and vacuum packing, egg packing and inspection, E.coli guidance, specialist cheese making and approved establishments. A number of officers were also booked to attend future courses including on HACCP and imported food controls.

- 3.1.14 The Authority had appointed a Lead Officer in line with the FLCoP, who could demonstrate that they had the necessary experience and qualifications for that role. Although this officer had attended some specialist food courses in the past, auditors recommended the officer attend appropriate courses in the future to help act as a refresher and to reflect the multidisciplinary role they carried out.

Recommendation

3.1.15 The Authority should:

- (i) Review and amend current officer authorisation documents to ensure they reflect officer qualifications and competencies and officers are suitably authorised under all relevant food hygiene legislation including the Official Feed and Food Control Regulations 2009 (as amended) and Trade in Animals and Related Products Regulations 2011. [The Standard - 5.1]
- (ii) Ensure that authorisation documents reflect the full scope and range of powers exercised by all officers, including service of Remedial Action Notices (RANs), inspection of approved and specialist premises and prosecutions. [The Standard - 5.1]
- (iii) Review the system of identifying officer competencies and associated training needs and ensure that all officers, including the lead officer, have regular update training on relevant food safety matters. [The Standard - 5.2 and 5.4]

3.2 Food Premises Database

- 3.2.1 Some procedural documentation for officer guidance had been developed by the Service and officers were able to demonstrate the simple checks that were run on the database currently to verify its accuracy. A good system of internal monitoring was also in place to ensure that correct codes and other data was inputted correctly by officers.
- 3.2.2 Checks on the database spreadsheet provided prior to the audit confirmed its accuracy and that it was capable of providing the returns required for the Local Authority Enforcement Monitoring System (LAEMS).
- 3.2.3 The database records contained only a few minor anomalies which were discussed with officers on the day.
- 3.2.4 A small number of overdue interventions were identified however the vast majority of these were compliant, lower risk premises and some had already been inspected by officers but had not yet been inputted into the database.
- 3.2.5 Officers had responsibility for entering records of enforcement activity, including inspection details and risk ratings on to the system. From the file checks undertaken, these ratings generally appeared to be appropriate and well considered with detailed reasoning for banding changes.

3.3 Food Premises Interventions

- 3.3.1 The Service Plan set out the proposed interventions programme for the year. This aimed to raise food business compliance in high risk premises and those with low food hygiene rating scheme (FHRS) scores that posed the highest risk.
- 3.3.2 The Plan also outlined inspection priorities which included the inspection of all high risk premises including those categorised as A, B or non-broadly compliant C. In practice however auditors found that all A to E category premises were in fact being inspected. The only exception to this rule was if the premise fell outside the scope of the FHRS and therefore did not require an intervention. Auditors were advised that a significant number of extra inspections would be undertaken by officers to address any backlog of inspections. Officers were able to demonstrate that this was being well managed and monitored.
- 3.3.3 The Service had developed detailed procedures for the inspection of food premises and approved establishments. These were up to date and made reference to relevant key pieces of legislation and guidance. The documents were also used as training aides for new officers joining the team.
- 3.3.4 The Service had a strategy in place for dealing with unrated and newly registered premises and inspection due dates were monitored by the Team Leader.
- 3.3.5 File checks were carried out on a number of files from registered general food establishments as part of the audit. Auditors found that interventions were generally carried out at the correct inspection frequency as required by the FLCoP. Files generally contained all relevant business details and inspection histories. Auditors noted that detailed and comprehensive inspection records were kept on files which allowed officers to demonstrate that business compliance with relevant hygiene legislation was assessed during each inspection. The Authority had developed a detailed inspection aide memoire for its routine premises inspections. This provided useful prompts for officers to record their assessments of business compliance. In addition, auditors saw examples of comprehensive letters to businesses following inspections advising them of any legal contraventions and timescales for compliance as well as offering useful advice. However auditors did note that some correspondence with a business contained references to out of date and repealed legislation.

- 3.3.6 A range of risk-based and proportionate follow-up actions were noted to achieve timely business compliance. Auditors did however recommend that officers record more details of their choice of follow-up action and timescales for compliance at higher risk establishments where other possible actions may have been available.
- 3.3.7 Record checks on a number of approved establishment files found that generally each file was well structured and contained all of the necessary information required by Annex 10 of the Food Law Code of Practice. Auditors found that in two of the files checked, officers had used a general food aide memoire for the inspection of these specialist processes where the more detailed and specific approved premises inspection form would have been more beneficial.

Records

- 3.3.8 All records of food law enforcement activities were maintained electronically on the food premises database system, with paper files being retained for prosecution and simple cautions as well as approved establishments. These were comprehensive and well organised and easily retrieveable.

Verification Visit to a Food Premises

- 3.3.9 During the audit, a verification visit was undertaken to a local catering establishment with the officer who had carried out the last revisit. The main objective of the visit was to assess the effectiveness of the Authority's assessment of food business compliance with food law requirements. The specific assessments included the conduct of the preliminary interview of the food business operator (FBO) by the officer, the general hygiene checks to verify compliance with the structure and hygiene practice requirements, and checks carried out by the officer to verify compliance with HACCP based procedures.
- 3.3.10 It was evident that the officer was familiar with the premises, had a good working relationship with the FBO, had very thoroughly assessed the business' compliance with legal requirements, and was providing helpful advice and guidance to the FBO.
- 3.3.11 Auditors discussed the benefit of undertaking periodic traceability checks on higher risk foods items such as meat or fish (shellfish) to ensure that traceability could be fully demonstrated by the FBO.

3.4 Enforcement

- 3.4.1 The Authority had developed a corporate Environment and Sustainable Communities Enforcement policy in November 2011. This was due to be reviewed later in the year. It helpfully contained information about the Authority's approach to enforcement with particular emphasis being placed on proportionality and the need for a graduated approach. A helpful review of the previous year's food enforcement action taken by the Service was documented in the 2014/15 Service Plan.
- 3.4.2 The Service had also developed more detailed and specific procedures on enforcement topics such as prosecutions, simple cautions, service of food notice and voluntary surrender.
- 3.4.3 It was evident that the Authority was using the full range of enforcement powers available as part of a robust graduated approach to enforcement. Files were examined for a wide range of enforcement actions including HINs, a voluntary surrender, simple caution and prosecution. From the file checks carried out, auditors noted that generally these enforcement actions had been an appropriate course of action and in line with the Authority's own policies and procedures. All files were easily retrievable and well organised. Auditors did find however that there was insufficient evidence of documented internal monitoring of HINs and in one case a notice had been issued which made reference to repealed legislation.
- 3.4.4 Where the most serious of enforcement actions was taken such as a simple caution and prosecution, there was clear evidence of consideration for the Authority's enforcement policy and involvement of senior management and the Legal Department. This included, in each case, a detailed file note which evidenced decision making and additional officer points to consider. Auditors discussed the benefits of ensuring that such files are accompanied by an outcome summary, for example the result of the court case.

3.5 Internal Monitoring, Third Party or Peer Review

Internal Monitoring

- 3.5.1 A system for internal monitoring had been developed by the Authority. Up to 5% of case files, including those relating to food complaints and food inspections were checked by the Service Manager (Commercial Regulation). Files from other aspects of the non-food service were also reviewed as part of this.
- 3.5.2 Auditors checked internal monitoring records and it was evident that follow up action was being taken with staff where errors or issues had been identified.
- 3.5.3 Other forms of internal monitoring included bi-monthly team meetings and quarterly divisional meeting in addition to officer consistency exercises and cascade training. Minutes of these meetings were documented. Quantitative checks such as interventions against the programme and number of overdue and unrated premises was also undertaken but these checks were not always documented.

Recommendation

3.5.4 The Authority should:

- (i) Review and expand where necessary, current internal monitoring arrangements including those relating to the service of notices, approved establishments, inspection records and correspondence to ensure full compliance with the Authority's own documented policies and procedures as well as centrally issued guidance. [The Standard – 19.1 and 19.2]
- (ii) Maintain records of internal monitoring for at least two years. [The Standard – 19.3]

Food and Food Premises Complaints

- 3.5.5 The Service had incorporated the complaints policy within the Service Plan and a separate complaints procedure had been implemented which included the investigation of food and food premises complaints.

- 3.5.6 Checks were made on records for a number of food and food premises complaints received by the Authority in the last six months. Comprehensive records of progress and follow up of investigations confirmed that generally they were appropriately and thoroughly investigated.

Food Sampling

- 3.5.7 The Authority had devised a sampling policy and procedure as well as a sampling programme.
- 3.5.8 The sampling programme had been developed to reflect local needs but was also influenced by nationally set priorities. Funding for the sampling programme was mainly provided locally or through the Public Health England (PHE) credit allocation. A range of samples had been collected during the 2013/14 and 2014/15 periods including from approved premises within the borough, from soda water guns and food contact surfaces as well as other ad-hoc samples as required.
- 3.5.9 EHOs and other food enforcement officers were responsible for taking samples for microbiological analysis whilst Trading Standards Officers (TSOs) were responsible for all other types of food sampling. Two officers within the Commercial Regulation team were responsible for overseeing the delivery of the sampling programme.
- 3.5.10 Records of a number of food samples were examined, including a mix of those taken informally and formally. In general these had been well investigated, with unsatisfactory results being followed up and retesting taking place where necessary. In one particular case involving an approved establishment in the district, auditors saw evidence of effective liaison with laboratories and other local authorities.

Third Party or Peer Review

- 3.5.11 There had been no relevant regional food liaison group inter-authority audit (IAA) initiatives in the past two years though the Authority advised they were proactively pursuing a potential IAA exercise within the Herts and Beds food group. Auditors acknowledged and discussed the benefits of participating in any relevant IAA schemes.

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ANNEX A - Action Plan for Bedford Borough Council

Audit date: 30 September – 1 October 2014

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.5 Ensure that future service plans include a clear comparison of the resource required to carry out the full range of statutory food law enforcement activities against the resources available to the Service. Details of how any shortfall will be addressed should also be provided. [The Standard – 3.1 and 3.2]	31/03/2015	Review of resource provision to be included within the Food & Feed Service Plan 2015/16, documented and submitted for Member approval.	Target date takes into account the Forward Plan of Key Decisions and the meeting of the Executive Committee and Full Council.
3.1.15(i) Review and amend current officer authorisation documents to ensure they reflect officer qualifications and competencies and officers are suitably authorised under all relevant food hygiene legislation including the Official Feed and Food Control Regulations 2009 (as amended) and Trade in Animals and Related Products Regulations 2011. [The Standard - 5.1]	31/12/2014	Review of the officer authorisation documentation to reflect all relevant food hygiene legislation including the Official Feed and Food Control Regulations 2009 (as amended) and Trade in Animals and Related Products Regulations 2011.	All relevant legislation has been reviewed and the revised documents will be updated and re-issued by the target date.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.15(ii) Ensure that authorisation documents reflect the full scope and range of powers exercised by all officers, including service of Remedial Action Notices (RANs), inspection of approved and specialist premises and prosecutions. [The Standard - 5.1]	31/12/2014	Review of the officer authorisation documentation to reflect the officers specific qualifications and competencies in relation to the full range of formal enforcement powers that can be exercised by officers, including approved premises.	All relevant authorisations with specific qualifications and competencies have been reviewed and the revised documents will be updated and re-issued by the target date.
3.1.15(iii) Review the system of identifying officer competencies and associated training needs and ensure that all officers, including the lead officer, have regular update training on relevant food safety matters. [The Standard - 5.2 and 5.4]	31/03/2015	Continue to formally raise with officers at annual PDR and 6 monthly review meetings, identifying individual training needs as necessary. An officer training and competency matrix will be established and reviewed on an annual basis to ensure the needs of all officers, including the lead officer, are identified and met in order to deliver an effective food service.	Existing officer training has been mapped and will be incorporated into a training and competency matrix that will be reviewed on an annual basis.
3.5.5(i) Review and expand where necessary, current internal monitoring arrangements including those relating to the service of notices, approved establishments, inspection records and correspondence to ensure full compliance with the Authority's own documented policies and procedures as well as centrally issued guidance. [The Standard – 19.1 and 19.2]	Completed	All approved premises are subject to inclusion for the internal verification/ monitoring system used for food inspections and food complaints. Documented internal monitoring procedures will be extended to include service of notice and correspondence with businesses.	Incorporated into the quarterly internal monitoring reviews.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.5.5(ii) Maintain records of internal monitoring for at least two years. [The Standard – 19.3]	Completed	Internal monitoring reviews are carried out on a quarterly basis and records will be kept for at least two years.	Carried out on a quarterly basis with records kept

ANNEX B Audit Approach/Methodology

The audit was conducted using a variety of approaches and methodologies as follows:

(1) Examination of LA policies and procedures.

The following relevant LA policies, procedures and linked documents were examined before and during the audit:

- Food Safety Service Plan for 2014/15
- Service policies and procedures
- Food premises inspection procedure and aide memoire
- Officer authorisation, training and qualification records
- Examples of recent team and food liaison group meeting minutes

(2) File reviews – the following LA file records were reviewed during the audit:

- General food premises inspections
- Approved establishments
- Food and food premises complaints
- Food sampling
- Formal enforcement activities
- Training and authorisation records

(3) Review of database records:

- To review and assess the completeness of database records of food hygiene inspections, food and food premises complaint investigations, samples taken by the authority, formal enforcement and other activities and to verify consistency with file records
- To assess the completeness and accuracy of the food premises database
- To assess the capability of the system to generate food law enforcement activity reports and the monitoring information required by the Food Standards Agency.

(4) Discussions with Officers

- Head of Regulatory Services
- Service Manager (Commercial Regulation)
- Team Leader, Commercial Regulation
- Environmental Health Officer
- Enforcement Officer

(5) On-site verification check:

A verification visit was made with the Authority's officer to a local food business. The purpose of the visit was to verify the outcome of the last inspection carried out by the Local Authority and to assess the extent to which enforcement activities and decisions met the requirements of relevant legislation, the Food Law Code of Practice and official guidance, having particular regard to LA checks on FBO compliance with HACCP based food management systems.

ANNEX C

Glossary

Authorised officer	A suitably qualified officer who is authorised by the local authority to act on its behalf in, for example, the enforcement of legislation.
Broadly Compliant	An outcome measure which the Food Standard Agency has developed with local authorities to monitor the effectiveness of the regulatory service relating to food law. It is based on the risk rating scheme in the Food Law Code of Practice which is currently used by food law enforcement officers to assess premises which pose the greatest risk to consumers failing to comply with food law.
Codes of Practice	Government Codes of Practice issued under Section 40 of the Food Safety Act 1990 as guidance to local authorities on the enforcement of food legislation.
County Council	A local authority whose geographical area corresponds to the county and whose responsibilities include food standards and feeding stuffs enforcement.
District Council	A local authority of a smaller geographical area and situated within a County Council whose responsibilities include food hygiene enforcement.
E.coli O157	E.coli O157 belongs to the group of verotoxigenic E.coli (VTEC) bacteria which are a toxin-producing strain of Escherichia coli that occur naturally in the gastrointestinal tract of animals such as cattle and sheep, and are pathogenic to humans. E.coli O157 is the VTEC strain that has been most commonly implicated in human infection in the UK.
Environmental Health Officer (EHO)	Officer employed by the local authority to enforce food safety legislation.

External Temporary Storage Facility (ETSF)	A warehouse (formerly known as an enhanced remote transit shed or ERTS) designated by HM Revenue and Customs (HMRC), where goods are temporarily stored pending clearance by HMRC, and prior to release into free circulation.
Feeding stuffs	Term used in legislation on feed mixes for farm animals and pet food.
Food hygiene	The legal requirements covering the safety and wholesomeness of food.
Food Hygiene Rating Scheme	The Food Hygiene Rating Scheme provides information to the public about hygiene standards in catering and retail food establishments. It is run by local authorities in partnership with the Food Standards Agency. Businesses that fall within the scope of the scheme are given a 'hygiene rating' which shows how closely the business was meeting the requirements of food hygiene law at the time of inspection. The scheme also encourages businesses to improve hygiene standards.
Food Safety Management System	A written permanent procedure, or procedures, based on HACCP principles. It is structured so that this requirement can be applied flexibly and proportionately according to the size and nature of the food business.
Food standards	The legal requirements covering the quality, composition, labelling, presentation and advertising of food, and materials in contact with food.
Framework Agreement	<p>The Framework Agreement consists of:</p> <ul style="list-style-type: none"> • Food and Feed Law Enforcement Standard • Service Planning Guidance • Monitoring Scheme • Audit Scheme <p>The Standard and the Service Planning Guidance set out the Agency's expectations on the planning and delivery of food and feed law enforcement.</p> <p>The Monitoring Scheme requires local authorities to submit yearly returns via LAEMS to the Agency on their food enforcement activities i.e. numbers of inspections, samples and prosecutions.</p>

Under the **Audit Scheme** the Food Standards Agency will be conducting audits of the food and feed law enforcement services of local authorities against the criteria set out in the Standard.

Full Time Equivalents (FTE)	A figure which represents that part of an individual officer's time available to a particular role or set of duties. It reflects the fact that individuals may work part-time, or may have other responsibilities within the organisation not related to food and feed enforcement.
HACCP	Hazard Analysis and Critical Control Point – a food safety management system used within food businesses to identify points in the production process where it is critical for food safety that the control measure is carried out correctly, thereby eliminating or reducing the hazard to a safe level.
LAEMS	Local Authority Enforcement Monitoring System is an electronic system used by local authorities to report their food law enforcement activities to the Food Standards Agency.
Member forum	A local authority forum at which Council Members discuss and make decisions on food law enforcement services.
Metropolitan Authority	A local authority normally associated with a large urban conurbation in which the County and District Council functions are combined.
Risk rating	A system that rates food premises according to risk and determines how frequently those premises should be inspected. For example, high risk premises should be inspected at least every six months.
Safer food, better business	A food safety management system, developed by the Food Standards Agency to help small catering and retail businesses put in place food safety management procedures and comply with food hygiene regulations.
Service Plan	A document produced by a local authority setting out their plans on providing and delivering a food service to the local community.

Trading Standards	The Department within a local authority which carries out, amongst other responsibilities, the enforcement of food standards and feeding stuffs legislation.
Trading Standards Officer (TSO)	Officer employed by the local authority who, amongst other responsibilities, may enforce food standards and feeding stuffs legislation.
Unitary Authority	A local authority in which the County and District Council functions are combined, examples being Metropolitan District/Borough Councils, and London Boroughs. A Unitary Authority's responsibilities will include food hygiene, food standards and feeding stuffs enforcement.