

Report on the Audit of Local Authority Inland Imported Food Control Arrangements

Bradford Metropolitan District Council
7-8 December 2010



Foreword

Audits of local authorities' feed and food law enforcement services are part of the Food Standards Agency's arrangements to improve consumer protection and confidence in relation to food. These arrangements recognise that the enforcement of UK food 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 Agency's website contains enforcement activity data for all UK local authorities and can be found at:

www.food.gov.uk/enforcement/auditandmonitoring.

The attached audit report examines the Local Authority's Feed and Food Law Enforcement Service. The audit scope includes the assessment of local arrangements in place for service planning, delivery and review, provision and adequacy of officer training on imports and authorisations, and implementation and effectiveness of imported food controls (including inspection, sampling and enforcement). Maintenance and management of appropriate records in relation to imported food activities and food businesses that handle imported food, as well as internal service monitoring arrangements, will also be examined.

This programme of focused audits has been specifically developed to address one of the main priorities identified in the Food Standard Agency's Strategy for 2010-2015 in meeting the outcomes that imported food is safe to eat and that regulation is effective, risk-based and proportionate. The strategic priority is to ensure risk-based, targeted checks at ports and local authority monitoring of imports throughout the food chain.

The audits examined Port Health Authority (PHA) and Local Authority (LA) systems and procedures for control of imported food and where relevant imported feed, at ports of entry (sea and air) and at inland authorities, in 15 geographically representative PHAs and LAs in England. The audits of PHAs were confined to food not of animal origin (FNAO), where relevant imported feed. However the audits of inland authorities covered products of animal origin (POAO) and FNAO. As part of the programme, other LAs with ports are also being contacted to establish whether liaison with ports and appropriate checks on imports are being undertaken.

Agency audits assess local authorities' conformance against the Feed and 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 (amended April 2010) and is available on the Agency's website at: www.food.gov.uk/enforcement/auditandmonitoring.

It should be acknowledged that there will be considerable diversity in the way and manner in which local authorities may provide their feed and food enforcement services reflecting local needs and priorities.

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 feed and 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.

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

CONTENTS

	Page
1.0 Introduction	5
<i>Reason for the Audit</i>	5
<i>Scope of the Audit</i>	5
<i>Background</i>	6
2.0 Executive Summary	8
3.0 Audit Findings	10
3.1 <i>Organisation and Management</i>	10
- <i>Strategic Framework, Policy and Service Planning</i>	10
- <i>Documented Policies and Procedures</i>	11
- <i>Authorised Officers</i>	11
- <i>Food Premises Database</i>	12
- <i>Liaison with Other Organisations</i>	13
3.2 <i>Imported Food Control Activities</i>	14
- <i>Food Premises Inspections</i>	14
- <i>Verification Visit to a Food Premises</i>	15
- <i>Food Inspection and Sampling</i>	16
- <i>Enforcement</i>	16
- <i>Food Complaints, Referrals, Primary Authority Scheme and Home Authority Principle</i>	17
- <i>Food Safety Incidents</i>	17
- <i>Advice to Business</i>	18
3.3 <i>Internal Monitoring and Third Party or Peer Review</i>	19
- <i>Internal Monitoring</i>	19
- <i>Third Party or Peer Review</i>	19
Annexe A - Action Plan for Bradford Metropolitan District Council	21
Annexe B – Audit Approach/Methodology	23
Annexe C – Glossary	24

1. Introduction

- 1.1 This report records the results of an audit at Bradford Metropolitan District Council with regard to food law enforcement, under relevant headings of the Food Standards Agency Feed and Food Law Enforcement Standard. The audit focused on the Authority's arrangements for imported food controls. The audit was undertaken as part of the Agency's focused audit programme on imported food and, where appropriate, feed controls. The report has been made publicly available on the Agency's website at:

www.food.gov.uk/enforcement/auditandmonitoring/auditreports.

Hard copies are available from the Food Standards Agency's Local Authority Audit and Liaison 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 feed and 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 Bradford Metropolitan District Council was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme. 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
- 1.3 Bradford Metropolitan District Council was included in the Food Standards Agency's programme of audits of local authority food and feed law enforcement services, because the Authority is home to a diverse community and therefore is likely to be an area where many local food businesses handle imported food. In addition the Authority was selected to be representative of a geographical mix of 15 PHAs and LAs selected across England.

Scope of the Audit

- 1.4 The audit examined Bradford Metropolitan District Council's arrangements for imported food controls in respect of both imported

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)

food not of animal origin (FNAO) and products of animal origin (POAO).

- 1.5 The audit scope included the assessment of local arrangements for service planning, delivery and review, provision and adequacy of officer training on imports and authorisations, implementation and effectiveness of imported food control activities, including inspection, sampling and enforcement. Maintenance and management of appropriate records in relation to imported food activities and food businesses that handle imported food, as well as internal service monitoring arrangements, were also examined.
- 1.6 The on-site element of the audit took place at the Authority's office at Jacobs Well, Bradford on 7-8 December 2010. The audit included a reality check to assess the effectiveness of official controls implemented by the Authority at a food business premises and, more specifically, the checks carried out by the Authority's officers to verify compliance with imported food law requirements.
- 1.7 The audit also afforded the opportunity for discussion with officers involved in imported food law enforcement with the aim of exploring key issues and gaining opinions to inform Agency policy. A set of structured questions were used as the basis for discussions which sought views and information on areas related to imported food controls such as:
 - Service planning and the strategic framework of controls
 - Training and support
 - Criteria used to determine the level of checks
 - Issues affecting the imported food control programme
 - Sampling, surveillance and enforcement approaches.
- 1.8 The information gained during interviews will be incorporated into a summary report on the imported food and feed inspection and control activities audit programme.

Background

- 1.9 The City of Bradford is located in West Yorkshire and is the fourth largest metropolitan district in the country, covering 141 square miles and home to a diverse multicultural population exceeding 493,000 people. Ethnic minorities account for approximately 24% of the population with 85% being of Pakistani, Bangladeshi or Indian origin.
- 1.10 In the 2010/2011 Health Protection Food Safety Service Plan, the Authority confirmed there were 4,193 registered food premises within their district, including 7 importers/exporters and 26 establishments that manufacture or process products of animal origin and 8 rural on-farm dairies, requiring approval under Regulation (EC) No. 853/2004.

- 1.11 The majority of food establishments within the Authority's district were either registered as food retailers or restaurant/catering businesses, with 1,216 food retailers and 2,790 premises registered as a restaurant or catering establishment. The Authority had identified there was a large turnover of food businesses and proprietors within the restaurant and catering sector which placed a strain on the team in terms of the resource required to undertake premises inspections.
- 1.12 Within the Service Plan for 2010/2011 the Authority had made reference to the inclusion of imported food checks as part of their routine food hygiene inspections, confirming the activity formed part of the overall inspection process. West Yorkshire Trading Standards Service (WYTSS) was responsible for the enforcement of food standards legislation specific to imported food controls.
- 1.13 The profile of Bradford Metropolitan District Council's food businesses, for 2009/2010 was as follows:

Type of Food Premises	Number
Primary producers	2
Manufacturers/Packers	144
Importers/Exporters	7
Distributors/Transporters	71
Retailers	1,216
Restaurants/Caterers	2,790
Total Number of Food Premises	4,230

2. Executive Summary

- 2.1 The Authority had developed a detailed Service Plan for Food Safety Enforcement which was broadly in line with the Service Planning Guidance in the Framework Agreement. The Plan made some reference to the Authority's imported food responsibilities in relation to food hygiene matters but required expansion to include the control and liaison arrangements in place with West Yorkshire Trading Standards Service (WYTSS) for all other areas of imported food legislation.
- 2.2 The Service had also identified a failure to meet certain targets due to high demands placed upon the Service, however a comparison between the demands on the Service and available resources had not been included within the Food Safety Service Plan and it was not clear as to how identified variances were to be addressed. There was evidence however that the Service had adopted a risk based approach to its hygiene intervention programme using the resources available.
- 2.3 The Authority had developed and implemented a documented procedure for the authorisation of officers involved in food safety work which detailed the method of determining authorisation in accordance with officer qualifications, experience and competency. Audit checks confirmed that officers were appropriately authorised, however authorisations required review to include all current relevant legislation.
- 2.4 Audit checks confirmed that officers had undertaken a minimum of 10 hours relevant training based upon the principles of continuing professional development in the last year, including some relevant training on imported food controls. Auditors discussed the benefit of officers completing refresher training to increase awareness of the latest official controls relating to high risk foods not of animal origin.
- 2.5 Although procedural guidance for officers made reference to imported food controls, a further review of procedures was required to confirm the extent of officer's responsibilities with regard to imported food controls and to provide details of any relevant liaison arrangements in place with WYTSS.
- 2.6 Audit checks confirmed that detailed records relating to hygiene controls were being maintained by officers following food safety inspections at food importers. The inspection aide-memoire however required further review to remind officers of the need to consider imported food controls at appropriate establishments and to document any relevant issues that might need referring to WYTSS.
- 2.7 It was clear that the Service was proactive in providing advice to all food businesses on imported food controls. This included periodic distribution of information leaflets to every registered food business within the district.

- 2.8 It was evident that there was liaison with WYTSS regarding imported food, referrals received by the Authority were investigated and appropriate follow-up action had been undertaken.
- 2.9 The Service maintained detailed food sampling procedures which provided officers with clear guidance for informal and official sampling activities. In conjunction with WYTSS, the Authority had developed and participated in a recent sampling project involving a range of imported foods on sale in the district. It was clear from the records examined during the audit that in all cases appropriate action had been taken following the receipt of sampling results.
- 2.10 The Authority had developed a detailed procedure for internal monitoring of officers' work which included a method for comment and feedback on each assessment undertaken. There was evidence of qualitative monitoring through officer peer review and regular quantitative monitoring through monthly reporting of business performance indicators.

3. Audit Findings

3.1 Organisation and Management

Strategic Framework, Policy and Service Planning

- 3.1.1 The Authority had developed a documented Food Safety Service Plan for 2010/2011 which was awaiting formal approval. The format of the Plan reflected the requirements of the Service Planning Guidance in the Framework Agreement. The Plan linked directly to the Council's "2020 Vision" which guided the work of the Council, "The Big Plan 2008-2011" document and the Corporate Plan 2007-2010.
- 3.1.2 The Food Safety Service Plan set out the Service's aims and objectives, which included an objective *'to ensure that all food produced, prepared and sold in Bradford is safe to eat.'* The Plan confirmed the requirement for *"local authorities to include inspection of imported food during routine food hygiene inspections."*
- 3.1.3 The Service Plan confirmed that the total staffing allocation for 2010/2011 was 12.5 Full Time Equivalent officers (FTE) for food safety work. The Service had identified that *"due to the high demands on the Service we are unable to meet all targets set for the Service by the FSA."* Noting that, *"In particular we are unable to inspect all categories of food premises due to limited resource."*
- 3.1.4 Although the Service had recognised that it was unable to meet some specified targets and that there had been a reduction in the number of FTE available to the Service from the previous year, the Authority had not quantified the full extent of the suggested shortfall. The Food Safety Service Plan would benefit from an analysis of the staff resources required to deliver all aspects of the food law enforcement service in comparison to the staff resource presently available to the Authority.
- 3.1.5 Performance was monitored on a monthly basis by the Authority's Health Protection Programme Management Group (PMG) who also undertook a six monthly review of the Food Safety Service Plan. Information was then made available to the Senior Management Team and the Strategic Director. In addition, a monthly review against planned work was undertaken during the Environmental Health Managers' one-to-one meetings.
- 3.1.6 Although performance reviews had identified some variances between the Authority's planned performance compared to that achieved, clear details of the measures required to improve and address the variances had not been included with the 2010/2011 Food Safety Service Plan.

Recommendation

3.1.7 The Authority should:

Expand the Service Plan covering the food law enforcement service in line with service planning guidance, to include:

- Clear reference to the arrangements in place with West Yorkshire Trading Standards Service regarding the enforcement of official controls relating to imported food.
- A clear and reasoned estimation of all demands placed upon the Service and the resources required to deliver the Service effectively.
- Details of any variances in meeting the Service Plan identified during review and to include the improvements identified as necessary to address variances in the subsequent Service Plan.

[The Standard - 3.1 and 3.3]

Documented Policies and Procedures

3.1.8 The Authority had developed a range of relevant policies and procedural documents that were held electronically on a shared drive to which all officers had access. A nominated officer maintained responsibility for updating and amending procedural guidance and related policies.

3.1.9 Procedures which were examined during the audit were all found to be appropriately controlled with each document being referenced and annotated with an issue date and a planned date for review.

Authorised Officers

3.1.10 The Authority had developed and implemented a detailed procedure for the authorisation of officers undertaking food hygiene and safety official controls. The procedure set out a clearly defined process by which officers were authorised based on their individual qualifications, experience and competency. The power to authorise officers was delegated down, through the Constitution of the Council, to the Strategic Director of Environment and Neighbourhoods and subsequently to the Head of Service (Environmental Health) and Principal Environmental Health Manager (Health Protection).

- 3.1.11 Audit checks confirmed that officers were appropriately authorised in line with their qualifications, experience and competency and were acting within their individual conferred levels of authorisation. Officers had been authorised under a range of current relevant imported food legislation in accordance with the Food Law Code of Practice, however legal reference relating to The Official Feed and Food Control (England) Regulations required updating.

Recommendation

3.1.12 The Authority should:

Review their procedure and schedule of officer authorisations and update as necessary to ensure it includes all current relevant legislation.
[The Standard - 5.1]

- 3.1.13 Officers' individual training and development needs were identified as part of an annual performance review process. Audit checks confirmed that officers had achieved a minimum of 10 hours relevant training based on the principles of continuing professional development.
- 3.1.14 Although officers had also attended some relevant training on imported food controls, auditors discussed the benefit of officers undertaking further refresher training to provide an awareness of current European Union (EU) legislation relating to imported food controls.

Recommendation

3.1.15 The Authority should:

Ensure that all relevant authorised officers receive further structured training regarding imported food controls to fully support their level of authorisation and role delivering imported food legislation. [The Standard - 5.4]

Food Premises Database

- 3.1.16 The Authority had in place a computer software system capable of providing accurate food law enforcement monitoring data to the Agency. The Service had included third country imported food sampling results within their Local Authority Enforcement Monitoring System (LAEMS) return for 2009/2010.

Liaison with Other Organisations

- 3.1.17 The Authority had effective liaison arrangements with neighbouring authorities through the West Yorkshire Principal Food Officers Group. The group included West Yorkshire Trading Standards Service (WYTSS) who maintained responsibility for the enforcement of food standards issues relating to imported food for the five authorities in the West Yorkshire Group.

3.2 Imported Food Control Activities

Food Premises Inspections

- 3.2.1 The Authority's Food Safety Service Plan 2010/2011 provided the following details of the Authority's food hygiene intervention programme.

Premises Risk Category	Number of Planned Food Premises Inspections
A	19
B	134
C	812
D	850
E	191
Unrated	175
TOTAL	2,181

- 3.2.2 Due to demands on the Service it was evident that the Authority was targeting resource to the inspection of food premises categorised as high risk. The Authority had implemented an alternative enforcement strategy (AES) at low risk food retail premises, including some known food importers, involving the post of a six monthly newsletter to all food businesses.
- 3.2.3 To help justify the Authority's use of AES as a suitable form of intervention at some lower risk food establishments, auditors discussed the benefit of further developing the AES to regularly provide the Authority with sufficient information to confirm that food handling activities carried out at these establishments remained unchanged.
- 3.2.4 The Authority had developed a detailed and comprehensive procedure relating to food hygiene inspections which included reference to imported food and a requirement for officers to check for any third country food imports and to determine legality through documentary checks. The procedure however did not make clear the extent to which officers were to be involved with imported food controls or give regard to the liaison arrangements in place with WYTSS.

Recommendation

- 3.2.5 The Authority should:

Review their inspection procedure to ensure that it accurately reflects the extent of officer responsibilities in relation to imported food controls and outlines any relevant liaison arrangements in place with West Yorkshire Trading Standards Service. [The Standard – 7.4]

- 3.2.6 The Authority was able to identify and classify food businesses within their district which were likely to import food from third countries. Although the inspection procedure required officers to consider imported food as part of their routine food safety inspections, it was not always possible to verify from record checks that this was standard practice.
- 3.2.7 Although audit file checks of potential food importers confirmed that detailed records were generally being maintained by officers during routine food safety inspections, the inspection aide-memoire in use was not sufficient to prompt officers to consider and record any relevant information regarding their assessment of imported food controls.
- 3.2.8 Auditors discussed the benefit of expanding the existing inspection aide-memoire, incorporating a prompt for officers to record any potential concerns relating to imported food that might require referral to WYTSS.

Recommendation

3.2.9 The Authority should:

Expand their inspection aide-memoire to incorporate a prompt for officers to record, where applicable, an assessment of food businesses imported food controls, including any matters requiring referral to WYTSS. [The Standard – 7.5]

Verification visit to a Food Premises

- 3.2.10 During the audit a verification visit was carried out at a local food importer with an officer from the Authority, who had carried out the last food hygiene inspection. The purpose of the visit was to determine the effectiveness of the Authority's assessment and application of imported food controls in relation to third country imports.
- 3.2.11 Although the officers' responsibilities generally involved the enforcement of general food hygiene regulations, the officer was able to demonstrate some awareness of the wider control arrangements associated with imported foods. The officer clearly understood the significance of maintaining an awareness of relevant imported food legislation to permit identification of potential issues, including relevant food standards issues, which may require referral to WYTSS.

Food Inspection and Sampling

- 3.2.12 The Authority maintained a food sampling policy which made specific reference to imported food sampling. The sampling activities of the Service were to *“pro-actively undertake food sampling at businesses which have been identified as either importing food directly or displaying for sale food which has been imported”*.
- 3.2.13 Comprehensive and practical procedural guidance had been developed and implemented for informal and official food sampling. The detailed procedures included guidance to officers on the procurement or purchase of samples, continuity of evidence and measures on prevention of deterioration or damage to food samples. Audit checks confirmed that the official laboratories used by the Authority for food sampling activities were properly accredited.
- 3.2.14 The Authority maintained a documented food sampling programme which included a commitment to use 10% of their credit allocation to sampling food products from third countries. In liaison with WYTSS a recent project had been completed where food importers, wholesalers and potential retailers of imported food had been identified and a specific programme of imported food sampling undertaken.
- 3.2.15 Audit checks carried out on imported food sample records confirmed that in all files examined imported food samples had been taken by an appropriately authorised officer and results recorded. In every case food business operators had been correctly notified of the examination results.

Good Practice –Sampling procedures

The Authority's food sampling procedures provided officers with comprehensive guidance for sampling activities, including methods, sample submission and the actions to be considered following the interpretation of microbiological results.

Good Practice –Sampling project

The Authority takes part in local imported food sampling projects in conjunction with WYTSS, to identify any microbiological or food standards issues related to imported foods.

Enforcement

- 3.2.16 The Authority had developed a Food Safety Enforcement and Prosecution Policy which was originally adopted by the Council in September 1994. The policy provided officers with guidance on the

range of enforcement options available and also made some reference to imported food. The policy reinforced the Authority's commitment that enforcement action taken in relation to food safety matters was reasonable, proportionate and consistent.

- 3.2.17 The Service had developed some documented procedures relating to enforcement actions, including the seizure and detention of food, with a specific procedure to assist officers in deciding whether to prosecute or issue a formal caution.
- 3.2.18 Auditors were advised that the enforcement of official controls for food standards issues relating to imported foods was undertaken by WYTSS. The Authority had not carried out any enforcement activity which specifically related to imported food controls.

Food Complaints, Referrals, Primary Authority Scheme and Home Authority Principle

- 3.2.19 The Authority had developed and implemented a specific procedure for officers on the investigation of food complaints, which although not specifically referencing imported foods, did contain an appendix detailing the liaison arrangements between WYTSS and other West Yorkshire local authorities.
- 3.2.20 The procedure contained a prioritisation process termed 'limited response', which although requiring review, provided officers with step by step guidance on the actions to consider when undertaking a variety of different complaint investigations.
- 3.2.21 Audit checks were carried out in relation to two referrals relating to imported food. In both cases it was evident that a thorough investigation had been undertaken by the Authority. Records confirmed that appropriate follow-up action had been carried out and the Service had notified the originating Authority with the results of their investigations.
- 3.2.22 The Authority confirmed its commitment to the Primary Authority Scheme and Home Authority Principle in the Food Safety Service Plan. Auditors were advised that formal Home Authority partnerships were in place with three local businesses.

Food Safety Incidents

- 3.2.23 The Authority had developed documented procedures to initiate and respond to food alerts. Audit checks confirmed that alerts for action had been effectively followed up with appropriate records maintained.

Advice to Business

- 3.2.24 The Authority was proactive in providing advice to food businesses, a variety of activities had been undertaken, including issuing food safety advice leaflets specifically related to imported food and traceability requirements and the distribution of information newsletters every six months to all food businesses within the district.

Good Practice –Advice to business

The Authority was proactively involved in providing food safety advice to all registered food businesses within their district. Information included within their six monthly newsletter, sent to all food businesses, had previously included legislative requirements concerning imported food.

3.3 Internal Monitoring and Third Party or Peer Review

Internal Monitoring

- 3.3.1 The Authority had recently reviewed their system for internal monitoring of the quality of officers food law enforcement work. A peer review procedure and related documentation, including detailed premises file checklists for accompanied inspections had been introduced. The monitoring process provided a summary of the inspection and provided a system for comment and feedback on each assessment undertaken. In addition, the Authority had previously undertaken a number of audits of officers' food sampling work and maintained comprehensive notes of audit findings.

Good Practice –Internal monitoring arrangements

The Authority had developed a detailed procedure and associated documentation for monitoring the quality of officers' food hygiene inspection work, which included a process for feedback and comment on monitoring findings.

- 3.3.2 Other relevant service review and monitoring arrangements undertaken by the Authority included:

- Officer performance reviews
- Regular documented team meetings including discussion of consistency issues and work planning
- Monthly monitoring of business performance indicators, including proactive inspection and associated actions
- Regular senior management team meetings to discuss performance.

Third Party or Peer Review

- 3.3.3 Auditors were informed that there had been no recent peer review activities undertaken by the Service in relation to imported food law enforcement work.

Auditors: Andrew Clarke
Andrew Gangakhedkar

Food Standards Agency

Local Authority Audit and Liaison Division

Action Plan for Bradford Metropolitan District Council

Audit date: 7-8 December 2010

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.1.7 Expand the Service Plan covering the food law enforcement service in line with service planning guidance, to include:</p> <ul style="list-style-type: none"> • Clear reference to the arrangements in place with West Yorkshire Trading Standards Service regarding the enforcement of official controls relating to imported food. • A clear and reasoned estimation of all demands placed upon the Service and the resources required to deliver the Service effectively. • Details of any variances in meeting the Service Plan identified during review and to include the improvements identified as necessary to address variances in the subsequent Service Plan. <p>[The Standard - 3.1 and 3.3]</p>	<p>30/04/11</p> <p>30/04/11</p> <p>30/04/11</p>	<p>Review current Service Plan to clearly show the division of enforcement between Bradford MDC and WYTSS with regard to imported food controls.</p> <p>Review current Service Plan to include an estimation of demands and resources.</p> <p>Review current Service Plan, identify variances and log any necessary improvements.</p>	
<p>3.1.12 Review their procedure and schedule of officer authorisations and update as necessary to ensure it includes all current relevant legislation.</p> <p>[The Standard - 5.1]</p>	<p>30/04/11</p>	<p>Amend procedures to cover PNOAO and to include regular reviews of authorisations in line with changes to legislation. Amend officer authorisation to reflect current relevant legislation.</p>	<p>Changes required already identified.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.15 Ensure that all relevant authorised officers receive further structured training regarding imported food controls to fully support their level of authorisation and role delivering imported food legislation. [The Standard - 5.4]		Identify appropriate imported food training and ensure officers receive training to a level which supports their role in enforcement of imported food legislation.	Appropriate on-line training identified through FSA online training portal. Arrangements to be made for all officers to undertake training.
3.2.5 Review their inspection procedure to ensure that it accurately reflects the extent of officer responsibilities in relation to imported food controls and outlines any relevant liaison arrangements in place with West Yorkshire Trading Standards Service. [The Standard – 7.4]	30/04/11	Review procedure.	
3.2.9 Expand their inspection aide-memoire to incorporate a prompt for officers to record, where applicable, an assessment of food businesses imported food controls, including any matters requiring referral to WYTSS and ensure that all documented observations are legible. [The Standard – 7.5]	30/04/11	Amend aide-memoire in line with audit recommendations.	Work commenced on updating aide-memoire. Amendments identified.

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

- Food Safety Service Plan 2010/2011
- West Yorkshire Trading Standards Food Service Plan 2010/2011
- Procedure for Monitoring the Quality of Food Hygiene Inspections
- Food Safety Enforcement and Prosecution Policy
- Range of formal enforcement procedures.
- Procedure for Undertaking Food Hygiene Inspections
- Procedures for Informal and Official Food Sampling
- Procedure for Dealing With Food Complaints
- Procedure for Food Alerts received from the Food Standards Agency
- Procedure for Initiating a Food Alert for a Food Hazard Originating in the Bradford Metropolitan District
- Procedure for Monitoring the Quality of Food Hygiene Inspections.

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

- The Authority's authorisation training and qualification records
- General food premises inspection records
- Food and sampling records
- Internal monitoring records
- Database reports
- Information report on imported food project work and advice to business.

(3) Interviews – the following officers were interviewed:

- Audit Liaison Officer – Environmental Health Manager
- Environmental Health Officer x 2.

Opinions and views raised during officer interviews remain confidential and are not referred to directly within the report.

(4) On-site verification check:

A verification visit was made with the Authority's officers to a local food importer. The purpose of the visit was to determine the effectiveness of the Authority's assessment and application of imported food controls in relation to third country imports.

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.
Border Inspection Post	Point of entry into the UK from non-EU countries for products of animal origin.
CEDs	Common Entry Documents which must accompany certain food products to first destination inland.
CVEDs	Common Veterinary Entry Documents which must accompany 3 rd country imported POAO to first destination inland
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.
Consignment	A unit of cargo that can consist of one or a number of different products.
County Council	A local authority whose geographical area corresponds to the county and whose responsibilities include food standards and feeding stuffs enforcement.
DPE	Designated point of entry. A port that has been designated for the entry of certain high risk feed and food products subject to enhanced checks.
DPI	Designated point of import. A port that has been designated for the entry of certain products subject to safeguard controls due to aflatoxin contamination.
Defra	The Department for Environment, Food and Rural Affairs. The Government Department designated as the central competent authority for products of animal origin in England.
District Council	A local authority of a smaller geographic area and situated within a County Council whose responsibilities include food hygiene enforcement.
ERTS	Enhanced remote transit shed. An HM Revenue and Customs designated warehouse where goods are held in temporary storage pending Customs clearance and release for free circulation.
Environmental Health Officer (EHO)	Officer employed by the local authority to enforce food safety legislation.
FNAO	Food not of animal origin. Non animal food products that fall under the requirements of imported food control regime.
Feeding stuffs	Term used in legislation on feed mixes for farm animals and pet food.

Food Examiner	A person holding the prescribed qualifications who undertakes microbiological analysis on behalf of the local authority.
Food hygiene	The legal requirements covering the safety and wholesomeness of food.
Food standards	The legal requirements covering the quality, composition, labelling, presentation and advertising of food, and materials in contact with food.
Formal samples	Samples taken in accordance with the requirements of the Food Law Code of Practice in accordance with the relevant sampling regulations and submitted to an accredited laboratory on the official list.
Framework Agreement	<p>The Framework Agreement consists of:</p> <ul style="list-style-type: none"> • Service Planning Guidance • Food and Feed Law Enforcement Standard • 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 annual returns to the Food Standards Agency on their food law enforcement activities i.e. numbers of inspections, samples and prosecutions.</p> <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.</p>
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 enforcement.
Home Authority	An authority where the relevant decision making base of an enterprise is located and which has taken on the responsibility of advising that business on food safety/food standards issues. Acts as the central contact point for other enforcing authorities' enquiries with regard to that company's food related policies and procedures.
Informal samples	Samples that have not been taken in accordance with the appropriate sampling regulation (e.g. samples for screening purposes) and/or not sent to an accredited laboratory.
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 and feed 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.
POAO	Products of animal origin. Animal derived products that fall under the requirements of the veterinary control regime.
Port Health Authority	An authority specifically constituted for port health functions including imported food control.
Primary Authority	An authority that has formed a partnership with a business.
Public Analyst	An officer, holding the prescribed qualifications, who is formally appointed by the local authority to carry out chemical analysis of food samples.
RASFF	Rapid alert system for food and feed. The European Union system for alerting port enforcement authorities of food and feed hazards.
Regulators' Compliance Code	Statutory Code to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on businesses.
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.
Service Plan	A document produced by a local authority setting out their plans on providing and delivering a food or feed service to the local community.
Third Country	Countries outside the European Union.
Trading Standards	The Department within a local authority which carries out, amongst other responsibilities, the enforcement of food standards and feed legislation.
Trading Standards Officer (TSO)	Officer employed by the local authority who, amongst other responsibilities, may enforce food standards and feed 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 feed enforcement.