

**Report on the Audit of Local Authority Food Law
Service Assessment of Food Businesses'
Food Safety Management System (FSMS)**

London Borough of Hackney
15-16 June 2010



Foreword

Audits of local authorities' 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 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 Food Law Enforcement Service. The assessment includes the local arrangements in place for officer authorisation and training, inspections of food businesses and internal monitoring. The audit scope was developed specifically to address Recommendations 9 and 15 of the Public Inquiry Report¹ into the 2005 E. coli outbreak at Bridgend, Wales. The programme focused on the local authority's training provision to ensure that all officers who check Hazard Analysis and Critical Control Point (HACCP) and HACCP based plans, including those responsible for overseeing the work of those officers, have the necessary knowledge and skills. Also, that existing inspection arrangements and processes to assess and enforce HACCP related food safety requirements in food businesses are adequate, risk based, and able to effect any changes necessary to secure improvements.

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 Local Authority Food Law Enforcement 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 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 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 the devolved countries comprising the UK.

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

¹ <http://wales.gov.uk/ecolidocs/3008707/reporten.pdf?skip=1&lang=en>

CONTENTS

	Page
1.0 Introduction	4
<i>Reason for the Audit</i>	4
<i>Scope of the Audit</i>	4
<i>Background</i>	5
2.0 Executive Summary	6
3.0 Audit Findings	8
3.1 Organisation and Management	8
- <i>Strategic Framework, Policy and Service Planning</i>	8
- <i>Documented Policies and Procedures</i>	10
- <i>Officer Authorisations</i>	10
3.2 Food Premises Inspections	12
- <i>Verification Visit to a Food Premises</i>	15
3.3 Enforcement	16
3.4 Internal Monitoring and Third Party or Peer Review	18
- <i>Internal Monitoring</i>	18
- <i>Food and Food Premises Complaints</i>	18
- <i>Food Sampling</i>	19
- <i>Third Party or Peer Review</i>	19
Annexe A - Action Plan for the London Borough of Hackney	21
Annexe B - Audit Approach/Methodology	31
Annexe C – Glossary	33

1. Introduction

- 1.1 This report records the results of an audit at the London Borough of Hackney 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 food premises inspections, enforcement activities 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 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 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 London Borough of Hackney was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme.
- 1.3 The Authority was included in the Food Standards Agency's programme of audits of local authority food law enforcement services, because it had not been audited in the past by the Agency and was representative of a geographical mix of 25 Councils selected across England. The Authority had also reported a low level of local food business compliance with food law, and a low number of full time equivalent food service officers in their 2008/2009 Local Authority Enforcement Monitoring System (LAEMS) Return to the Agency.

Scope of the Audit

- 1.4 The audit examined the London Borough of Hackney's arrangements for food premises inspections and internal monitoring with regard to food hygiene law enforcement, with particular emphasis on officer competencies in assessing food safety management systems based on HACCP principles. 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 other related food hygiene law enforcement activities.

- 1.5 Assurance was sought that key 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 office at the Environmental Health and Consumer Protection offices, 81 Downham Road, London on 15-16 June 2010.

Background

- 1.6 The London Borough of Hackney is a densely occupied inner London authority. The Authority's Food Service Plan 2009/2010 advises that the borough has a population of approximately 207,000 and a high degree of deprivation (all wards are within the bottom 10% of deprivation in the United Kingdom).
- 1.7 The Authority has a diverse community with approximately half of all residents being from ethnic minorities. There is a large Jewish community in the north of the Borough, large Turkish and Kurdish communities in Dalston and Stoke Newington, a Vietnamese community in the central/south area and an African community in central Hackney.
- 1.8 There are mainly small businesses in Hackney and previous survey work indicated a 55% change in occupancy per annum for food businesses. A large number of Hackney's businesses are micro, with five or less employees.
- 1.9 The food safety service was part of the Environmental Health Unit, in the Safer Neighbourhoods Division, and was responsible for enforcing food hygiene and food standards legislation in the Borough. The Unit was also responsible for health and safety enforcement and public health work including the investigation of infectious diseases and foodborne infectious diseases.
- 1.10 The profile of London Borough of Hackney's food businesses as of 31 March 2009 was reported as follows:

Type of food premises	Number
Primary Producers	5
Manufacturers/Packers	69
Importers/Exporters	49
Distributors/Transporters	21
Retailers	1,026
Restaurants/Caterers	1,805
Total number of food premises	2,975

2. Executive Summary

- 2.1 The newly appointed Environmental Health Manager had developed risk based food law enforcement priorities for 2010/2011 together with action plans to address identified shortfalls in the Service. This review and findings were consistent with the Agency's audit findings.
- 2.2 The Authority had developed a Food Service Plan for 2009/2010 that was generally in line with the Service Planning Guidance in the Framework Agreement. However, the plan did not include a comparison of the staff resources required to deliver the food law enforcement service against the staff resources available to the Authority. The absence of staffing resource information made it difficult for the Service to substantiate and quantify any resource shortfalls.
- 2.3 A significant number of key service activities did not have procedures, for example for formal enforcement activities and food hygiene general premises inspection and this was likely to be a contributory factor where instances of inconsistency had been identified.
- 2.4 The Authority had developed and implemented a documented procedure for officer authorisation, which detailed the measures in place to assess and link officer competency to the level of authorisation conferred. The authorisations required updating to incorporate some more up to date legal references. All officers had received recent training in the evaluation of food safety management systems. Although sufficient training records were not available to confirm that all officers had received the required 10 hours of relevant Continuing Professional Development, it was recognised that the Environmental Health Manager was in the process of developing a training plan.
- 2.5 The Authority's limited procedures and the associated documentation for general premises inspections and approved establishments did not provide adequate guidance for officers. Due to the absence of adequate records, it was not possible to confirm whether appropriate inspections, interventions and effective follow-up actions were being carried out, or whether premises risk ratings were accurate. The key reason for the lack of essential information was because officers did not use inspection forms to record food business information and their inspection assessments. In practice, officers were using their own notebooks and recording minimal details on the shared files and electronic databases.
- 2.6 Consequently, there was no single source or completed record of businesses' compliance histories. Full business compliance histories are essential to inform subsequent interventions and a graduated approach to enforcement, and to enable effective monitoring. The

Environmental Health Manager had already identified this issue and it was a key item in her action plan.

- 2.7 The Authority was focusing on higher risk premises in its intervention programme, although the audit confirmed that some higher risk premises were not being inspected at the required frequencies. Although the overall number of unrated premises had recently been reduced, there were still a significant number of premises that were due their first inspection.
- 2.8 Due to the lack of records, auditors were unable to determine the extent of assessments made during approved establishments inspections. As a result it was not possible to establish the basis for officer's decisions regarding business compliance standards. In a number of cases examined, businesses were being allowed to trade under conditional approval that greatly exceeded the permitted statutory period of six months and where officers had identified significant issues with their food safety management systems. The need for an urgent review of all approved establishments had been discussed with the Environmental Health Manager.
- 2.9 It could not be confirmed from all the food samples and food and food premises complaint records examined that appropriate and timely investigations were being carried out. It did not appear that complainants were informed of the outcomes in all cases where appropriate. In some cases where unsatisfactory food sample test results had been received, it was not clear that appropriate follow-up action was taken where there was a potential risk to public health.
- 2.10 The Authority had developed a generic enforcement policy which was generally in accordance with centrally issued guidance. It was noted that the Environmental Health Manager had been planning to produce additional enforcement guidance specific to food together with documented procedures for the enforcement options.
- 2.11 Although it was clear that officers were prepared to take the full range of formal enforcement actions to secure compliance at the highest risk premises, the records of actions were inconsistent and incomplete. Auditors were unable to confirm, in most cases, that follow-up actions and appropriately graduated approaches to enforcement had been taken, and what the outcomes were in terms of securing compliance.
- 2.12 The Environmental Health Manager had identified the importance and need for internal monitoring, but in practice little was being undertaken. Many of the concerns raised by this audit would have been identified by an effective internal monitoring system.

3. Audit Findings

3.1 Organisation and Management

Strategic Framework, Policy and Service Planning

- 3.1.1 The Authority had developed a Food Service Plan for 2009/2010 which was generally in accordance with the Service Planning Guidance in the Framework Agreement. Whilst the Plan contained details of most of the service delivery demands, it did not include estimates of the resources, such as the staffing levels required to deliver the food law enforcement service against the resources available to the Authority. A full establishments' profile, an estimate of any revisits, and the financial allocation, were also needed. No documentary evidence was available to confirm the approval of the 2009/2010 Plan, however auditors were advised that the Plan for 2010/2011 would be submitted to an appropriate Member forum for approval and would include a review of the previous year together with any variances and identified areas for improvement.

Recommendation

- 3.1.2 The Authority should:

Draw up, document and implement a Food Service Plan 2010/2011 in accordance with the Service Planning Guidance. The Plan should include a comparison of the resources required to deliver the food law enforcement service against the resources available to the Authority, based upon the full range of demands placed upon it, including all its statutory duties. The Authority should also undertake a documented review of the Food Service Plan for 2009/2010, and any variance in meeting the plan, and areas for improvement should be included in the 2010/2011 Plan, which should be approved by the relevant member forum or delegated senior officer.

[The Standard – 3.1, 3.2 and 3.3]

- 3.1.3 The Service Plan 2009/2010 set out the Authority's food service aims:

- *Prevent food poisoning and ill health associated with food, ensure that foods are labelled and represented correctly to consumers, and promote good nutritional standards locally.*
- *Minimise the transmission of communicable and infectious diseases.*

- *Enforce food safety/food hygiene, health and safety at work and public health law, to protect and promote public health.*
- *Deliver a cost effective, efficient and fair enforcement service in these areas.*
- *Improve the accessibility to our service, and increase information available and contacts made via Hackney's website etc.*
- *Put the consumer first, be open and trusted.*

3.1.4 The newly appointed Environmental Health Manager (EHM) had undertaken a general review of the food service prior to the audit and had drawn up a draft risk based Food Safety Service 2010/2011 priorities document, which identified what the Service proposed to do in key service areas and an action plan. It was intended that these would be incorporated into the Service Plan 2010/2011. The Agency had identified the Authority as having low levels of broad compliance within food businesses from the 2008/2009 Local Authority Enforcement Monitoring System (LAEMS) return, with a level of 60.7% broad compliance reported. The EHM had identified this service area as a priority and action was planned on all not broadly compliant premises, with the intention that such premises would *'receive enforcement action to drive up improvements and bring to broad compliance'*.

3.1.5 A planned work programme for 2010/2011 had also been drawn up which included 2,072 food hygiene inspections and participation in some food safety projects including work on *Safer food, better business*.

3.1.6 Information provided as part of the 2008/2009 LAEMS return had indicated that there were a total of 2.5 full time equivalent (FTEs) professional and administrative posts in the food service. The Service Plan 2009/2010 had identified approximately 5 FTE staff allocated to the food service, whereas information supplied at the time of the audit indicated that there was currently approximately 8.9 FTE staff engaged in food safety work. However, demands on staff resources, including those for the implementation of priorities, action plans and the Service Plan needed to be estimated to ascertain if actual staff provision was sufficient for the effective delivery of the service. One Principal Officer post was vacant and auditors were advised that re-structuring was being considered at the time of the audit.

3.1.7 The Service had recently responded to the findings of the Pennington Inquiry into the 2005 outbreak of E. coli in south Wales by developing an action plan in which specific Pennington issues had been identified for consideration and work allocated to specific officers within set timescales. A project focusing on butchers' shop premises had been

carried out and was to be reviewed by the EHM. Officers had also attended a relevant locally organised training course.

Documented Policies and Procedures

- 3.1.8 The Authority had developed only a few documented procedures covering some food law enforcement issues. The EHM had identified the general lack of key procedures and the need to address this, within the summary of planned action following the service review. Specific procedures were needed on, for example: interventions, formal enforcement actions, investigation of food and food premises complaints, food sampling and internal monitoring. There was no control system for the documentation relating to the Authority's enforcement activities.

Recommendation

3.1.9 The Authority should:

Ensure that documented procedures are developed and implemented for all enforcement activities and that these are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance. Set up, maintain and implement a control system for all documentation relating to its enforcement activities. [The Standard – 4.1 and 4.2]

Officer Authorisations

- 3.1.10 The Authority had a draft procedure on induction and training for authorisation of food law enforcement. This took account of individual officers' qualifications, training, experience and competency. A competency assessment had been carried out for all relevant officers including contractors, and each had been individually authorised. The procedure needed to be reviewed to ensure that it included references to all relevant and up to date legislation and the 'level 2' authorisation for higher certificate holders needed to exclude reference to prohibition procedures. Food and Environment Protection (FEPA) Act 1985 authorisation needed to be excluded as this is undertaken by the Agency and not by the local authority.

Recommendation

3.1.11 The Authority should:

Review the documented authorisation procedure to ensure that it includes references to all relevant and up to date legislation, with appropriate limitations and authorisations. [The Standard - 5.1]

3.1.12 Auditors were advised that an annual performance review system for officers was in place where training needs were discussed. All authorised officers had achieved recent training on the evaluation of food safety management systems. Although sufficient training records were not available to confirm that all officers had received the required minimum 10 hours relevant training, based on the principles of continuing professional development, it was recognised that the EHM was in the process of developing a Team training plan and had identified the need for formal enforcement training. Auditors were advised that training would be reviewed at 1:1 supervisory meetings and at the six monthly reviews, as well as annually.

3.1.13 Audit checks confirmed that evidence of officers' qualifications was available and that copies of relevant qualification certificates had been retained by the Authority.

Recommendation

3.1.14 The Authority should:

Ensure that complete records of training undertaken by officers are maintained and that officers receive the training that they need to maintain competency as identified in the training plan. [The Standard – 5.5]

3.2 Food Premises Inspections

- 3.2.1 The Authority had provided details of the current food hygiene inspection programme which was to be incorporated into the Food Service Plan 2010/2011. This had been broken down by risk category and stated that 2,072 businesses were due for inspection; this included 299 unrated premises and an estimated 300 new/unrated premises that would open during the year. High risk and those establishments assessed as not broadly compliant, together with new and unrated establishments had been prioritised for inspection.
- 3.2.2 The Authority's limited procedures and associated documentation on inspection did not provide adequate guidance for officers. A food premises inspection proforma for catering/retail, a food importers inspection form, and an inspection checklist and template report for manufacturing and wholesale food establishments had been developed. Procedures for approval of food business establishments and enforcement against food business establishments subject to approval required review, in particular to include officer assessment and recording of food business compliance with HACCP requirements. However sufficiently detailed documented procedures for the full range of interventions/inspections carried out by the Authority had not been developed.

Recommendation

3.2.3 The Authority should:

Set up, maintain and implement documented procedures for the range of interventions/inspections it carries out and review the procedure on enforcement against food business establishments subject to approval.

[The Standard – 7.4]

- 3.2.4 File and database record checks confirmed that the Authority was generally implementing a risk based food premises inspection programme. However some inspections of general and approved establishments were not always being carried out within the time frames specified in the Food Law Code of Practice. Database checks highlighted a substantial number of overdue and unrated food businesses including three category A, five category B and 292 category C premises overdue for inspection.

Recommendation

3.2.5 The Authority should:

Ensure that food hygiene inspections of premises in their area are undertaken at a frequency which is not less than that determined under the food establishment intervention rating scheme set out in the Food Law Code of Practice. [The Standard – 7.1]

3.2.6 Record checks on general food hygiene premises confirmed that detailed records of inspections were not generally available. Due to the absence of adequate records it was not possible to confirm whether appropriate inspections, interventions and effective follow-up actions were being carried out, or whether intervention ratings were accurate. The main reason for the lack of essential information was because officers were not using the inspection forms to record food business information and inspection assessments. In practice, officers were using their own notebooks and recording minimal details on the shared files and electronic databases.

Recommendation

3.2.7 The Authority should:

Ensure that observations and data obtained during interventions/inspections are recorded to prevent loss of relevant information, is legible and stored in such a way that it is easily retrievable. Up to date, accurate and comprehensive records should be maintained for all food establishments in its area and for all food law enforcement activities in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.5 and 16.1]

3.2.8 In addition, the Authority's records did not contain basic information on the business, such as the size and scale of the business, type of food activity, food suppliers and other businesses to which food was supplied.

3.2.9 Consequently, there was no single source of complete records of businesses' compliance histories or key premises information. Full business compliance histories are essential to inform subsequent interventions and a graduated approach to enforcement, and to enable effective internal monitoring. The inspection forms would also benefit from review and further development to allow officers to demonstrate that businesses were being inspected against all

relevant food hygiene legislation, including a more detailed assessment of business compliance and progress with HACCP. The EHM had already identified these issues and they were key items in her action plan.

Recommendation

3.2.10 The Authority should:

Review and develop its inspection aides-memoire to allow officers to clearly demonstrate that on every occasion, they fully assess the compliance of all establishments and their systems against legally prescribed standards and centrally issued guidance, including where appropriate a detailed assessment of business compliance with HACCP based food safety management system requirements. [The Standard – 7.3 and 16.1]

3.2.11 File record checks confirmed that reports of inspection or letters outlining inspection findings were not always provided to the food business operator (FBO). Hand written reports were not always clearly legible. Correspondence did not generally include a timescale for achieving compliance, contraventions were not always clearly identified or worded, together with the measures needed to secure compliance outlined, and the contact details for the senior officer were not included. It did not appear from the records that timely revisits had been undertaken where necessary.

Recommendation

3.2.12 The Authority should:

Assess the compliance of all food premises, including approved establishments to legally prescribed standards, including where appropriate a detailed assessment of business compliance with HACCP based food safety management system requirements, taking appropriate action on any non-compliance found in accordance with the Authority's enforcement policy. [The Standard – 7.3]

3.2.13 Files for three approved establishments in the Authority's area were examined during the audit. Due to the lack of records, auditors were unable to determine the extent of assessments made during approved establishment inspections. As a result it was not possible to establish the basis for officers' decisions regarding business compliance standards. In a number of cases examined, businesses were being

allowed to trade under conditional approval for time periods that greatly exceeded the permitted statutory six months and where officers had identified significant issues with their food safety management systems. In a further case it appeared that the establishment had not been re-approved under current hygiene legislation. The need for an urgent review of all approved establishments was discussed with the EHM. Approved establishment files also required review as they did not provide all the information required by Annexe 12 of the Food Law Practice Guidance.

Recommendation

3.2.14 The Authority should:

Carry out an urgent review of approved establishments, taking appropriate action on non-compliance, in accordance with the Authority's enforcement policy. Undertake interventions/inspections and formally approve establishments in its area in accordance with relevant legislation, the Food Law Code of Practice and other centrally issued guidance. Maintain up to date, accurate and comprehensive records for all approved establishments subject to Regulation (EC) No. 853/2004 in accordance with Annexe 12 of the Food Law Practice Guidance.
[The Standard – 16.1, 7.2 and 7.3]

Verification Visit to a Food Premises

- 3.2.15 During the audit, a verification visit was undertaken to a local baker's shop with an officer from the Authority, who had carried out the last food hygiene inspection of the premises. 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 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.
- 3.2.16 The audit visit confirmed that the checks carried out by the officer were thorough and covered relevant food law requirements. The officer demonstrated a detailed knowledge of the food safety management system in place at the business and it was evident that the officer had developed a supportive working relationship with the proprietor who was clearly making improvements in response to the advice provided by the officer.

3.3 Enforcement

- 3.3.1 The Authority had adopted a Safer Neighbourhoods Joint Enforcement Policy which had been approved by Members in June 2009. The policy confirmed the Authority's fundamental aim to promote and achieve sustained compliance with the law and the policy introduced a Council-wide risk-based framework for enforcement. Auditors were advised that the EHM planned to address and clarify the food safety enforcement policy, including a graduated approach to enforcement, by reviewing and updating the Commercial Standards Service Unit enforcement policy guidance.
- 3.3.2 The Authority had developed documented procedures on specific enforcement options, such as remedial action and detention notices and withdrawal of approval, however it was acknowledged that procedures should be developed on the full range of available enforcement options including prosecutions and simple cautions, hygiene emergency prohibitions and hygiene improvement notices and seizure/detention and surrender of food.

Recommendation

3.3.3 The Authority should:

Set up, maintain and implement documented procedures for follow up and enforcement actions in accordance with the Food Law Code of Practice and official guidance and provide further guidance on food safety enforcement policy.
[The Standard – 15.1 and 15.2]

- 3.3.4 There was evidence that officers were providing support and guidance to businesses. Although it was clear that officers were prepared to take the full range of formal enforcement actions to secure compliance at the highest risk premises, the records relating to these actions were inconsistent and incomplete. Auditors were therefore unable to confirm, in most cases, that follow-up actions and appropriately graduated approaches to enforcement had been taken, and what the outcomes were in terms of securing compliance.
- 3.3.5 Records for three hygiene improvement notices were examined during the audit. It was not always clear that a notice was the appropriate course of action due to a lack of inspection and premises records. Wording of notices were generally clear and easily understood. However signed true copies of notices were not routinely available and it was not always clear on expiry of the notice that a timely check or appropriate follow-up had been undertaken where

needed. The Authority was unable to provide copies of letters sent to FBOs to confirm compliance with the notices.

- 3.3.6 Records for one voluntary closure and two hygiene emergency prohibition notices were examined and confirmed that these were appropriate courses of action. However due to the difficulty in retrieving records it was not possible to ascertain if monitoring visits were undertaken or what happened during and following their closure.
- 3.3.7 Records for two prosecutions and three simple cautions were examined. It appeared that prosecution or simple caution was generally the appropriate course of action, however there were gaps in record keeping and where available, prosecution decision forms had not been signed by the appropriate authorised officers.

Recommendation

3.3.8 The Authority should:

Ensure that all food law enforcement is undertaken in accordance with the Food Law Code of Practice and official guidance. Decisions following consideration of the Authority's Enforcement Policy, including any reasons for departure from the criteria set out in the policy should be documented. [The Standard - 15.3 and 15.4]

3.4 Internal Monitoring and Third Party or Peer Review

Internal Monitoring

- 3.4.1 The EHM had identified the importance and need for internal monitoring but in practice little had yet been undertaken and the Authority had not developed internal monitoring procedures for all areas of the food law enforcement service. Some quantitative monitoring of complaints and the inspection programme was being carried out and an arrangement for the qualitative monitoring of authorised officers was set out in the draft procedure on induction and training for authorisation of food law enforcement. Evidence of completed checklists for drafting of hygiene improvement notices was available and food law enforcement issues were discussed at regular team meetings. Many of the concerns raised by this audit would have been identified by an effective internal monitoring system.
- 3.4.2 An internal review had recently been undertaken by the newly appointed EHM and her findings were consistent with the findings of this audit. An action plan to address identified shortfalls in the service had been developed by the EHM and there was evidence that the implementation of the plan had commenced.

Recommendation

3.4.3 The Authority should:

Set up, maintain and implement documented qualitative and quantitative procedures on internal monitoring for all areas of the food law enforcement service. Verify its conformance with the Standard, relevant legislation, the Food Law Code of Practice, relevant centrally issued guidance and the Authority's own policies and procedures and maintain records of all internal monitoring undertaken.
[The Standard - 19.1, 19.2 and 19.3]

Food and Food Premises Complaints

- 3.4.4 The Authority had developed and implemented a documented policy on complaints about food and food premises which was detailed in the Food Service Plan 2009/2010. Some information for complainants had been developed but the Authority did not have documented procedures for investigating complaints about food and food premises. The records for five food and food premises complaint investigations were examined. It was not clear in three of the records that appropriate follow-up action had been taken to fully investigate complaints relating to hygiene in food premises; it could not be

confirmed from the records whether the complainant had been advised of the results or that investigations were always undertaken in a timely manner.

Recommendation

3.4.5 The Authority should:

Set up, maintain and implement a documented procedure dealing with food and food premises complaints. Ensure that complaints are investigated in accordance with the Food Law Code of Practice, centrally issued guidance and the Authority's own policy on investigation of food and food premise complaints. [The Standard – 8.1 and 8.2]

Food Sampling

3.4.6 The Authority had developed a food safety sampling policy and a sampling programme for 2010/2011 which took account of national and local priorities, however a food sampling procedure had not been developed. Audit checks on five unsatisfactory food samples could not confirm that appropriate and timely investigations were carried out. In some cases it was not clear from the records that appropriate follow-up action had been taken where there was a potential risk to public health. It was confirmed by the Authority that follow-up action had not been taken in these cases.

Recommendation

3.4.7 The Authority should:

Set up, maintain and implement documented procedures for the inspection of food and food sampling. Ensure that appropriate action is taken in accordance with its enforcement policy where sample results are not considered to be satisfactory.
[The Standard – 12.3, 12.5 and 12.7]

Third Party or Peer Review

3.4.8 Auditors were advised that the Authority had participated in some benchmarking exercises relating to premises compliance with other London boroughs. This had confirmed Hackney's low level of

business compliance with food hygiene law and the high number of unrated premises. The Authority planned to address these issues through implementation of a key priorities programme for 2010/2011 through which the Authority intended to target all non-broadly compliant premises *'to receive enforcement action to drive up improvements and bring to broad compliance.'*

Auditors: **Sally Hayden**
John Questier
Christina Walder

Observer: Abimbola Adeyemi

Food Standards Agency

Local Authority Audit and Liaison Division

Action Plan for London Borough of Hackney

Audit date: 15-16 June 2010

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.2 Draw up, document and implement a Food Service Plan 2010/2011 in accordance with the Service Planning Guidance. The Plan should include a comparison of the resources required to deliver the food law enforcement service against the resources available to the Authority, based upon the full range of demands placed upon it, including all its statutory duties. The Authority should also undertake a documented review of the Food Service Plan for 2009/2010, and any variance in meeting the plan, and areas for improvement should be included in the 2010/2011 Plan, which should be approved by the relevant member forum or delegated senior officer. [The Standard – 3.1, 3.2 and 3.3]	30/09/10 Completed Completed 18/10/10	To develop Food Law Enforcement Service Plan 2010/2011 in accordance with Service Planning Guidance in the framework Agreement on Food Law Enforcement. To include review of performance against Plan for 2009/2010. To identify resources requirements and risk based priorities. To submit to appropriate member forum.	Draft completed. Awaiting comments and feedback before finalising.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.1.9 Ensure that documented procedures are developed and implemented for all enforcement activities and that these are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance. Set up, maintain and implement a control system for all documentation relating to its enforcement activities. [The Standard – 4.1 and 4.2]</p>	<p>31/03/11</p> <p>30/09/10</p>	<p>To develop and review documented procedures and include timely review periods. All procedures to include relevant enforcement pathways.</p> <p>To ensure briefings/training on the use of new procedures.</p> <p>Food Hygiene Inspections, Food Standards Inspections, Food Establishment Approval procedures and associated documents prioritised for production July/August 2010.</p> <p>To review and amend procedure for approval of food establishments to include enforcement framework in respect of food establishments subject to approval.</p>	<p>Action plan drawn up to programme the development of documented procedures. Completed</p> <p>1) Food Standards procedure draft completed. Sign-off by 30/09/10</p> <p>2) Food Hygiene procedure draft completed. Sign-off by 30/09/10</p> <p>Associated warning letter completed and in use. Documents templates held on Council Document Management (CDM) system.</p> <p>3) Approved Establishment procedure draft completed and reviewed waiting for amendment.</p>
<p>3.1.11 Review the documented authorisation procedure to ensure that it includes references to all relevant and up to date legislation, with appropriate limitations and authorisations. [The Standard - 5.1]</p>	<p>Completed</p> <p>Completed</p>	<p>To review Induction and Training for Authorising Enforcement Officers procedure (ITA) to ensure that it includes the up to date legislation, relevant references.</p> <p>To ensure appropriate authorisations and restrictions/limitations are put in place.</p>	<p>Completed. Includes relevant amendments and up dated schedule of legislation.</p> <p>Authorisation sign off by Corporate Director by 07/09/10.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.1.14 Ensure that complete records of training undertaken by officers are maintained and that officers receive the training that they need to maintain competency as identified in the training plan. [The Standard – 5.5]</p>	<p>Completed</p> <p>Completed</p> <p>13/09/10</p>	<p>All records of qualifications and training to be retained and maintained.</p> <p>To use information provided from Annual Appraisals/1:1's to develop training plan for officers/team in order to maintain competencies and ensure briefings and where required training on the use of new and amended legislation, guidance and procedures. Details of briefings and training will be documented and in accordance with the Induction and Training for Authorising Enforcement Officers procedure (ITA) and evaluated/monitored during monthly 1:1's/supervision meetings and case load reviews with staff.</p>	<p>Process in place for the retention and maintenance of records in accordance with Authorisation, Induction and Training procedure.</p> <p>Details of all qualifications and training held on Council Document Management (CDM) system.</p> <p>Officers training plan completed as part of the appraisals process.</p> <p>Team training plan to be circulated.</p>
<p>3.2.3 Set up, maintain and implement documented procedures for the range of interventions/inspections it carries out and review the procedure on enforcement against food business establishments subject to approval. [The Standard – 7.4]</p>	<p>30/09/10</p>	<p>Develop Food Safety Enforcement Policy in respect of the range of interventions activities and inspections undertaken by the Service. To include enforcement framework in respect of food establishments subject to approval in Food Safety Enforcement Policy.</p>	<p>Draft Food Safety Enforcement Policy completed. Internal consultation completed.</p> <p>Awaiting sign off Deputy Director of Safer Neighbourhoods.</p> <p>Also see 3.1.9 (above)</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.2.5 Ensure that food hygiene inspections of premises in their area are undertaken at a frequency which is not less than that determined under the food establishment intervention rating scheme set out in the Food Law Code of Practice. [The Standard – 7.1]	30/09/10	Service planning to include risk based priorities for 2010/2011 to ensure those premises posing the greatest risk receive an intervention as a priority and to ensure interventions/inspections to be carried out within 28 days of due date.	Priorities laid out in Food Law Enforcement Service Plan. Specifically Category A and B premises inspected within 28 days of due date. Ongoing from July 2010.
	Completed	To generate report from the database to provide spreadsheet of due interventions/inspections for allocation on a quarterly basis and develop a programme for those premises awaiting an intervention.	Reports generated on a quarterly basis. Quarterly allocations to officers of all due inspections and ongoing weekly & monthly monitoring. Quarterly – ongoing from July 2010.
	Completed	To develop and implement monitoring and validation protocols for interventions/inspections.	Weekly, monthly, quarterly quantitative monitoring implemented. Ongoing from July 2010.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.2.7 Ensure that observations and data obtained during interventions/inspections are recorded to prevent loss of relevant information, is legible and stored in such a way that it is easily retrievable. Up to date, accurate and comprehensive records should be maintained for all food establishments in its area and for all food law enforcement activities in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 7.5 and 16.1]</p>	30/09/10	<p>To develop aide-memoire as a record of observations arising from an intervention/inspection.</p>	<p>Draft template document held on Council Document Management (CDM) system.</p> <p>See 3.2.10 (below)</p>
	31/03/11	<p>Development of procedure on Food Hygiene and Food Standards inspects, including development of template 'warning letter'</p>	<p>Initial visit by IT consultant 27/07/10.</p>
	31/03/11	<p>To carry out audit of database and review report from IT consultant, identify gaps and additional work, and implement recommendations.</p>	<p>Report received 25/08/10</p>
	31/03/11	<p>To develop action plan to build capacity and integrity of database.</p> <p>To carry out the following:</p> <ol style="list-style-type: none"> 1) Database data cleansing 2) Data cleansing and identify external resources 3) Review of codes; 4) Develop the use of mandatory fields 5) Limit permissions for use for creation/deletion of premises records 6) Develop document templates for mail merge 7) Develop process templates 8) Training/updating staff via 1:1/ coaching <p>To develop procedure manual for staff covering all aspects of the database and service activities.</p>	<p>As above and ongoing from 2010</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
As above	31/03/11	<p>To Audit of Council Data Management system (CDM)</p> <p>To carry out the following:</p> <ol style="list-style-type: none"> 1) Identify internal/external service resources 2) Review of file paths and develop an agreed file path for document storage; 3) Liaise with CDM team to audit system and develop procedure for controlling creation /deletion and amendments to premises records premises; 4) Develop monitoring process to ensure integrity of files; 5) Training/updating staff via 1:1/ coaching; 6) Development of procedure manual as a guide to staff in respect of service activities. 	<p>Audit of naming convention within CDM files carried out.</p> <p>Initial meeting with CDM consultant/administrator on 27/07/10. Ongoing from July 2010.</p> <p>Support from CDM team on-going</p>
	31/03/11	Training/updating staff via 1:1/coaching.	Training needs identified and coaching/training to commence from 30/09/10.
	Completed	To maintain paper files /hard copies as archive only with the exception of premises subject to the approval process.	<p>Process in place for maintenance and storage of records in respect to premises subject to approval implemented.</p> <p>Current inspection and case documents scanned to CDM.</p>
	Completed	To set up paper files for all premises subject to approval.	File records completed in accordance with Annexe 12.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.2.10 Review and develop its inspection aide-memoire to allow officers to clearly demonstrate that on every occasion, they fully assess the compliance of all establishments and their systems against legally prescribed standards and centrally issued guidance, including where appropriate a detailed assessment of business compliance with HACCP based food safety management system requirements. [The Standard – 7.3 and 16.1]</p>	<p>30/09/10</p>	<p>To develop inspection aide-memoire for food hygiene and food standards, and food premises approvals to ensure appropriate assessment of businesses compliance with HACCP based food safety management system requirements are undertaken.</p>	<p>Draft Food Hygiene and Standards inspection aide-memoire completed.</p> <p>Draft aide-memoire for Manufacturers & Distributors completed. Additional addendums for:</p> <p>Dairy products – completed Egg Products – completed Mince meat, Meat Preparations & Mechanically Separated Meat – completed Meat Products – completed Fish Products – initiated</p>
<p>3.2.12 Assess the compliance of all food premises, including approved establishments to legally prescribed standards, including where appropriate a detailed assessment of business compliance with HACCP based food safety management system requirements, taking appropriate action on any non-compliance found in accordance with the Authority's enforcement policy. [The Standard – 7.3]</p>	<p>31/03/11</p> <p>30/09/10</p> <p>17/09/10</p>	<p>Assessment of compliance with HACCP based food safety management system requirements of all approved establishments to be recorded on aide-memoire to evidence of enforcement decision making process in respect of non-compliance.</p> <p>To develop an aide-memoire to ensure recording of assessments of compliance with HACCP based food safety management system requirements, to evidence of enforcement decision making process in respect of non-compliance.</p> <p>To undertake internal monitoring to validate officer's assessment. Monitoring of approval process included in the internal monitoring procedure.</p>	<p>As above in 3.2.10.</p> <p>Assessment & decision making process included in aides-memoire for Food Hygiene, Food Standards & Approval Procedures and Food Safety Enforcement Policy.</p> <p>As above in 3.2.10.</p> <p>Template in draft.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.2.14 Carry out an urgent review of approved establishments, taking appropriate action on non-compliance, in accordance with the Authority's enforcement policy. Undertake interventions/inspections and formally approve establishments in its area in accordance with relevant legislation, the Food Law Code of Practice and other centrally issued guidance. Maintain up to date, accurate and comprehensive records for all approved establishments subject to Regulation (EC) No. 853/2004 in accordance with Annexe 12 of the Food Law Practice Guidance. [The Standard – 16.1, 7.2 and 7.3]</p>	<p>30/09/10</p> <p>Completed</p>	<p>Immediate review of all approved establishments to assess compliance/non-compliance including benchmarking with neighbouring LA.</p> <p>Decision and action following non-compliance to be identified and documented using aide-memoire.</p>	<p>Benchmarking undertaken with a neighbouring Council</p> <p>Programme for re-assessment of all approved establishments completed.</p> <p>X2 conditional approvals refused.</p> <p>X3 full approval paper work to be submitted for sign off by 10/09/10. Completed</p> <p>X1 awaiting re-inspection/check for granting full approval by 23/09/10 and sign off by 30/09/10.</p> <p>X1 awaiting post re-inspection/check decision for full approval and sign off by 30/09/10</p> <p>X1 awaiting decision on granting full approval subject to HIN compliance 20/10/10.</p> <p>X1 new approval enquiry</p> <p>All cases to be reviewed at monthly 1:1's/supervision meetings.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
	Completed	Develop process for maintenance of up to date, accurate and full records relating to establishments subject to ensure records comply with Food Law COP.	<p>Proforma developed as an index /checklist in accordance with Annexe 12.</p> <p>All case files reviewed for compliance with Annexe12.</p> <p>All new case files to be reviewed by line manager and at sign off.</p>
<p>3.3.3 Set up, maintain and implement documented procedures for follow- up and enforcement actions in accordance with the Food Law Code of Practice and official guidance and provide further guidance on food safety enforcement policy. [The Standard – 15.1 and 15.2]</p>	31/10/10	Follow-up actions and enforcement actions for food safety enforcement activities to be incorporated into the Food Safety Enforcement Policy and respective procedures based on the Food Law COP and current centrally-issued guidance.	<p>Draft Food Safety Enforcement Policy completed. See 3.2.3.</p> <p>Template provided to officers to record food safety enforcement activities and to provide weekly/monthly returns on follow-up and enforcement actions.</p> <p>All follow-up actions and enforcement actions on cases to be reviewed at monthly 1:1's/supervision meetings.</p>
<p>3.3.8 Ensure that all food law enforcement is undertaken in accordance with the Food Law Code of Practice and official guidance. Decisions following consideration of the Authority's Enforcement Policy, including any reasons for departure from the criteria set out in the policy should be documented. [The Standard - 15.3 and 15.4]</p>	Completed	Decisions to be made in accordance with respective procedure and Food Safety Enforcement Policy and departures from procedures and the Policy to be documented as stated therein.	<p>Reference made in draft Food Safety Enforcement Policy. Each procedure for food safety activities includes reference to decision-making and departure from procedure.</p> <p>Decision sheet produced as part of Food Hygiene, Food Standards inspection and approved premises aide-memoire. Implementation ongoing.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.4.3 Set up, maintain and implement documented qualitative and quantitative procedures on internal monitoring for all areas of the food law enforcement service. Verify its conformance with the Standard, relevant legislation, the Food Law Code of Practice, relevant centrally issued guidance and the Authority's own policies and procedures and maintain records of all internal monitoring undertaken. [The Standard - 19.1, 19.2 and 19.3]</p>	<p>Completed</p> <p>31/03/11</p>	<p>Review, set up and implement documented procedure for internal monitoring of Inspection documentations, letters and notices and approvals documentations</p> <p>Review, set up and implement documented procedure for internal monitoring of activities of food sampling</p> <p>Review and set up documented procedure for internal monitoring of activities and extend to include infectious disease notifications, emergency prohibition proceedings, seizure/detention and voluntary surrender actions, food complaints, service requests, prosecutions.</p>	<p>Procedure completed</p> <p>Internal monitoring of Hygiene Improvement Notices, Food Complaints, Warning Letters, Approved Premises and documentation arising from food premises inspections.</p>
<p>3.4.5 Set up, maintain and implement a documented procedure dealing with food and food premises complaints. Ensure that complaints are investigated in accordance with the Food Law Code of Practice, centrally issued guidance and the Authority's own policy on investigation of food and food premise complaints. [The Standard – 8.1 and 8.2]</p>	<p>30/09/10</p>	<p>To develop procedure for food and food premises complaints to ensure complaints are investigated in accordance with Food Law COP and centrally issued guidance. Procedure to include appropriate enforcement action</p> <p>To review Policy document.</p>	<p>Included in the action plan for development of procedures.</p> <p>Enforcement action in respect of food complaints incorporated into the Food Safety Enforcement Policy.</p>
<p>3.4.7 Set up, maintain and implement documented procedures for the inspection of food and food sampling. Ensure that appropriate action is taken in accordance with its enforcement policy where sample results are not considered to be satisfactory. [The Standard – 12.3, 12.5 and 12.7]</p>	<p>31/10/10</p>	<p>To develop procedure for food sampling to ensure food samples are taken in accordance with Food Law COP and relevant legislation. Procedure to include appropriate enforcement action.</p>	<p>Included in the action plan for development of procedures.</p> <p>Enforcement action in respect of food sampling incorporated into the Food Safety Enforcement Policy.</p>

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 Service Plan 2009/2010, 2008/2009 and 2007/2008
- Briefing notes for Members
- Internal review of food law enforcement service and summary of planned action
- Food Safety Service Priorities 2010/2011
- Work programme for 2010/2011
- Action plan relating to implications of Pennington Report into South Wales E. coli outbreak
- Procedure on induction and training for authorisation of food law enforcement
- Completed Competency Assessment Forms for officers
- Documentation for Inspection of Food Premises and aides-memoire
- Approved Establishment Procedures
- Food Sampling Policy
- Food Sampling Programme 2010/2011 and 2009/2010
- Food Complaints Policy and associated documents
- Council Complaints procedure
- Safer Neighbourhoods Joint Enforcement Policy
- Commercial Standards Service Unit enforcement policy
- Team meeting minutes
- Benchmarking exercises

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

- Officer training and competency records
- General food premises inspection records
- Approved establishment files
- Food complaint records
- Food sampling records
- Formal enforcement records
- Internal monitoring records
- Database records

(3) Officer interviews – the following officers were interviewed:

- Audit Liaison Officer
- Senior Environmental Health Officer

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 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 specific regard to LA checks on FBO compliance with HACCP based food management systems.

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.
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 geographic area and situated within a County Council whose responsibilities include food hygiene enforcement.
E. coli	<i>Escherichia coli</i> microorganism, the presence of which is used as an indicator of faecal contamination of food or water. <i>E. coli</i> 0157:H7 is a serious food borne pathogen.
Environmental Health Officer (EHO)	Officer employed by the local authority to enforce food safety legislation.
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 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 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 law enforcement.</p> <p>The Monitoring Scheme requires local authorities to submit quarterly returns to the Agency on their food 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 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.

HACCP		Hazard Analysis 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.
OCD returns		Returns on local food law enforcement activities required to be made to the European Union under the Official Control of Foodstuffs Directive.
Regulators' Code	Compliance	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 6 months.
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 (TSO)	Officer	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.