

# Audit of Local Authority Service Delivery Controls for Incidents and Alerts

Hart District Council  
29-30 September 2015



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## **1.0 Introduction**

- 1.1 This is a report on the outcomes of the Food Standards Agency's (FSA's) audit of Hart District Council conducted on the 29-30 September 2015 at the Civic Centre, Harlington Way, Fleet, Hampshire GU51 4AE. The audit was carried out as part of a programme of audits on local authority (LA) controls for incidents and alerts. The report has been made available on the Agency's website at:

[www.food.gov.uk/enforcement/auditandmonitoring/auditreports](http://www.food.gov.uk/enforcement/auditandmonitoring/auditreports)

Hard copies are available from the FSA's Operations Assurance Division at Foss House, Peasholme Green, York, YO1 7PR. Tel: 01904 232116.

- 1.2 The audit was carried out under section 12(4) of the Food Standards Act 1999 and the Agency will produce a summary report covering outcomes from the audits of all local authorities assessed during this programme.

## **2.0 Scope of the Audit**

- 2.1 The audit focused on controls that the LA had in place to deal with incidents and alerts with reference to the Framework Agreement and the Food Law Code of Practice (FLCoP). This included organisation and management, resources, development and implementation of appropriate control procedures, receipt of and response to alerts, reporting of incidents, advice enforcement and sampling, premises database, training and authorisation of officers, liaison and internal monitoring. Views on current arrangements for incidents and alerts were also sought to inform FSA policy development.

## **3.0 Objectives**

- 3.1 The objectives of the audit were to gain assurance that:

- LAs have adequate capability and effective controls in place to deal with incidents and alerts with reference to the requirements of the Standard in the Framework Agreement, the FLCoP and centrally issued guidance.
- The interface between the FSA and LAs with regard to the handling of incidents and alerts is appropriate and effective.

The audit also sought to;

- Identify any significant weaknesses and potential improvements in the overall arrangements for the handling of incidents and alerts.

- Identify and disseminate good practice for incidents and alerts controls.

## **4.0 Executive Summary**

4.1 The Authority was delivering a range of incidents and alerts controls in accordance with the statutory obligations placed on the Authority and the interface between the FSA and the Authority was for most parts effective. However the Authority needed to make improvements to fully meet the requirements of the Framework Agreement and the Food Law Code of Practice (FLCoP). A number of potential improvements in the overall arrangements and controls for incidents and alerts were also identified. The key areas for improvement are set out below.

### **4.2 Key areas for LA improvement:**

#### **Incidents and Alerts**

4.2.1 The documented incidents and alert procedure required review to include all the details required by the FLCoP. The Authority had not recorded receipt, response and outcomes for four food alerts for action examined. The Authority needed to ensure that it documented responses and outcomes to all alerts. Records for one notification relating to an approved establishment were difficult to retrieve so auditors were unable to accurately identify when the risk assessment was carried out that prompted the notification.

#### **Organisation and Management**

4.2.2 The Authority needed to ensure that the Service Plan included details of the Authority's policy on dealing with food alerts and incidents and provided clearer details of the impact of any shortfall in resources on the delivery of its food law enforcement service.

4.2.3 Whilst outside of the specific scope of this audit, auditors were concerned about the low full time equivalent (FTE) officer resource currently available to deliver official controls given the wide range of service duties and statutory responsibilities placed upon it. Auditors were given assurance by the Head of Regulatory Services that additional officer support was to be made available and that the food premises intervention programme was still being delivered in accordance with Food Law Code of Practice (FLCoP).

## **Enforcement**

4.2.4 There were examples where the Authority's officers had carried out enforcement action in a manner that was not in accordance with the requirements of the FLCoP. In carrying out enforcement action in relation to the service of enforcement notices and the detention, voluntary surrender and withdrawal of food from the market the Authority needed to ensure such actions were in accordance with the FLCoP and guidance.

## **Authorisation**

4.2.5 The level of authorisation and duties of officers should be consistent with their qualifications, training, experience and the FLCoP requirements.

## **5.0 Audit Findings and Recommendations**

### **5.1 Organisation and Management**

5.1.1 The Authority had developed a documented Food Service Plan for 2015/16 which had been approved by elected Members. The Plan was well structured and broadly followed the Service Planning Guidance in the Framework Agreement.

5.1.2 As required by the Framework Agreement, the Service Plan did not include a specific section for feed/food safety incidents and would benefit from the provision of additional information concerning the Services policy on the arrangements for the receipt of alerts and product recalls from the FSA and out of hours arrangements.

5.1.3 The Plan highlighted that due to a current staffing vacancy only the Head of Regulatory Services (HRS) was authorised to carry out the full range of food safety interventions. Auditors discussed the impact a lack of suitably qualified, experienced and competent food officers could have on the operational delivery of official controls when responding to food alerts, for example the possible need to seize and detain foods. (The wider implications of the current lack of operational resource is also referred to in the section headed Issues Outside the Scope of the Audit). The HRS advised the Service had recently appointed an officer who was undergoing a period of revision training and competency assessment in accordance with the Food Law Code of Practice (FLCoP) which once completed would enable the officer to be fully authorised and appointed as lead food officer in place of the HRS.

5.1.4 Auditors were informed the Service had an informal arrangement with a neighboring LA, which subject to their officers meeting the FLCoP requirements allowed the Authority to authorise them to provide additional support to carry out food law enforcement if needed. Auditors

were advised this included responding to food alerts and incidents out of normal working hours. Auditors discussed the benefits of providing a more formal procedure including a potential memorandum of understanding to cover the current working arrangement with the neighboring LA to ensure appropriate qualified and competent food officers were available to support food law enforcement activities when required, including the arrangements for out of hours alerts and incidents.

- 5.1.5 Whilst the Plan set out the staffing resources allocated to the Service this did not relate to the actual full time equivalent (FTE) and it did not include a clear assessment of staffing levels required to meet all the statutory demands on the service. The absence of such information makes it difficult to quantify any resource shortfalls and the impact this may have on service delivery to senior managers and to Members. It was agreed that this would be addressed when developing the 2016/17 Food Enforcement Service Plan.

### **Recommendations**

5.1.6 The Authority should:

- (i) Ensure that Service Plans include a clear comparison of the resources required to carry out the full range of statutory food law enforcement activities against the resources available to the Service. [The Standard - 3.1]
- (ii) Ensure that Service Plans include a statement in relation to the Authority's policy on handling food alerts to confirm it complies with the Food Law Code of Practice [The Standard -3.1]
- (iii) Ensure that the Service has a sufficient number of suitably qualified, experienced and competent officers to carry out the work set out in the Food Service Plan. [The Standard – 5.3]

## **5.2 Incidents and Alerts**

5.2.1 The Authority had developed a documented procedure revised in March 2015 for responding to food alerts and food safety incidents in regard to food hygiene.

5.2.2 Auditors advised that the procedure would benefit from further review to contain those details required in accordance with the FLCoP. This included more specific details of any out of hour's arrangements, liaison arrangements with other relevant bodies, emergency contact details for relevant staff and practical arrangements for access to buildings and the Authority's food premises database and equipment.

### Out of Hours Arrangements

5.2.3 The Service operated a rota system with named food officers for the provision of an out of hours request service, including any alerts and incidents. Auditors discussed the need to ensure the on call arrangements included the availability of officers fully authorised to carry out the full range of food law enforcement if required.

5.2.4 Officers had access to the Authority's premises, sampling equipment and remote access to computerised records if needed. The Service was able to arrange out of hours submission of products for testing and storage as required. Arrangements had been made to provide storage facilities for foodstuffs seized or detained if needed.

### Food Alerts

5.2.5 Food alerts were received by email into the Authority's mailbox and forwarded to relevant officers by a Business Support Officer. Officers also directly subscribed to the FSA alerting service. Once received, alerts were triaged by the HRS and/or an authorised officer and next actions were then determined based on an assessment of the information provided. Records for four alerts for action were examined. Auditors were unable to confirm any action taken by the LA as a result of the alerts as there was no mechanism in place for recording the receipt of the alert onto the Authorities database and any subsequent actions taken. Auditors were advised that in future receipt of alerts will be coded on the database under service requests and visits to commercial premises will be coded to record any actions taken.

### Notifications

5.2.6 In addition to the four alerts examined, records for three notifications to the FSA were checked. The Authority had carried out an appropriate assessment of the food hazard and effective liaison between the Authority and the FSA was noted in each case. However in all three instances the notifications were not followed up by the completion of the model form as required by the FLCoP Annex 3.

5.2.7 Records for one notification relating to an approved establishment were difficult to retrieve so auditors were unable to accurately identify when the risk assessment was carried out that prompted the notification. In all instances there was good evidence to show appropriate liaison with home authorities and neighboring LAs.

5.2.8 Auditors reviewed three sampling records and two food hygiene complaints to assess if hazards should have been reported to the FSA. In one out of the three samples checked there was evidence of notification to the FSA following detection of pathogenic organisms. The remaining samples were correctly risk assessed and did not require a notification to the FSA at the time they were reported. One was linked to a premise that had been subject to a remedial action notice and a previous incident notification and the third sample did not require notification based upon the Public Analysts report. In all instances there was good evidence to show liaison with other Authorities when appropriate. Auditors examined two food hygiene complaints and both cases did not require notification as a serious localised or non-localised food hazard.

### **Recommendations**

5.2.9 The Authority should:

- (i) Document its response to and the outcome of each food alert [The Standard -14.3]
- (ii) Review the documented procedure for food alerts and incidents to ensure it contains the details required by the Food Law Code of Practice. [The Standard 14.1 & 14.4]
- (iii) Maintain up to date accurate records in retrievable form on all food establishments in its area in accordance with the Food Law Code of Practice. [The Standard 16.1]

## **5.3 Advice to Business**

5.3.1 Whilst the Authority website did not provide specific advice material in regard to alerts and incidents it did link to the FSA website providing a source of further information.

5.3.2 The Authority stated that advice regarding alerts and incidents would be available to business via service requests or where business had requested information during visits/interventions.



## **5.4 Food Inspection and Sampling**

- 5.4.1 The Authority is a member of the Hampshire, Isle of Wight and Surrey Sampling Liaison Group and had developed a terms of reference document dated April 2015-16. The document set out the aims of the group which included participation in national and local surveys.
- 5.4.2 A sampling policy and procedure had also been developed by the LA which had review dates of 2005. Both contained out of date references and auditors discussed the need to review these documents. The sampling policy and procedure would benefit from further development to ensure that they contained links to the alerts and incidents procedure and provided suitable work instructions and guidance for officers on the range of follow up actions to be considered, including up to date references of the circumstances requiring contact with the FSA.

### **Recommendation**

5.4.3 The Authority should:

Review and develop its Sampling Policy and Procedure to include suitable links to its alerts and incidents procedure.[The Standard 12.3]

## **5.5 Enforcement**

- 5.5.1 The Authority had developed a documented Regulatory Enforcement Policy approved by Members. The Policy identified enforcement options available and circumstances under which they should be used, and took into account the Code for Crown Prosecutors, the Regulator's Code and an Appeals mechanism.
- 5.5.2 The Authority had developed a procedure last reviewed in October 2013 for various enforcement options including the seizure, detention and surrender of food.
- 5.5.3 The Authority had carried out a range of enforcement actions in relation to the three food incidents reported to the Agency and included visits to two approved establishments. This included two remedial action notices, a seizure and detention notice and a voluntary surrender of foodstuffs. Whilst generally the Authority were able to demonstrate that prompt actions had been taken to investigate the incidents, auditors were not able to determine that in each case the Authority had carried out the actions appropriately in accordance with the FLCoP due to difficulties in retrieving information from the establishment files. Auditors advised that the approved establishment files examined should be reviewed to ensure records of interventions relating to official

controls were easily retrievable and in accordance with the FLCoP. Auditors noted a remedial action notice had been served by an unauthorised officer and in one case the voluntary surrender of food was not documented and the food disposal had not been correctly supervised by the LA in accordance with the FLCoP. Auditors discussed the need to review the enforcement procedure with officers to ensure enforcement actions were implemented in accordance with the FLCoP requirements.

#### **Recommendation**

5.5.4 The Authority should:

Review and implement its documented enforcement procedures in accordance with the FLCoP and official guidance. [The Standard- 15.2& 15.3]

### **5.6 Control and Investigation of Outbreaks and Food Related Disease**

- 5.6.1 Auditors reviewed the Communicable Disease Outbreak Plan for Hampshire and Isle of Wight Local Health Resilience Partnership. The Control Plan had been developed in association with all relevant organisations. This provided a framework within which officers could operate and was currently being reviewed.
- 5.6.2 Two records of outbreaks were checked and had resulted in an incident being appropriately reported to the FSA in respect of pasteurised egg infected with salmonella. A second outbreak was limited to a local restaurant and it was determined it was not a serious localised or non localised food hazard which required notification to the FSA.

### **5.7 Authorised Officers**

- 5.7.1 The Authority had developed a documented procedure reviewed August 2015 for the authorisation of food safety officers carrying out food hygiene duties. The HRS was responsible for the assessment of officer's qualifications, training needs and competence before authorisation.
- 5.7.2 The Authority had a corporate appraisal and performance system in place whereby officer development and training needs were assessed on an annual basis and reviewed at 6 month intervals and also during one to one meetings.
- 5.7.3 Qualifications and training records for relevant officers were examined and these demonstrated that officers were receiving the minimum 10

hours relevant training per annum based on the principles of continuing professional development. Auditors noted one officer had received specific training in regard to alerts and incidents.

- 5.7.4 The procedure included a matrix detailing the legislation officers were authorised under to restrict officers' powers. Subsequent file checks identified officers had been inappropriately authorised for some food law enforcement in excess of their current level of qualification, experience and competency in both the matrix and individual written authorisation certification. As referenced earlier an officer had served an enforcement notice as part of an incident investigation which exceeded their level of authorisation and was not in accordance with the applicable FLCoP at the time the action was taken. Auditors noted this had not been identified as part of the Services internal monitoring checks of enforcement action taken. Auditors discussed the need to review the authorisation procedure matrix and officer's individual written authorisation certification to ensure the level of authorisation and duties of officers was consistent with the Authority's assessment of officer's qualifications, experience and competency in accordance with the FLCoP.

#### **Recommendation**

5.7.5 The Authority should:

Review the authorisation of food officers to ensure they are appropriately authorised under all relevant current legislation in accordance with their individual level of qualification, experience and competency.

[The Standard – 5.3]

### **5.8 Reviewing and Updating Documented Policies and Procedures**

- 5.8.1 The Authority had developed a range of documented policies, procedures and work instructions which were directly and indirectly related to incidents and alerts food law enforcement activities.
- 5.8.2 Auditors found that the majority of the documented procedures in place had been recently reviewed but some were overdue and contained out of date legal and guidance references. These have been referenced in the report.

## **5.9 Facilities and Equipment**

5.9.1 The authority's computerised software package which was capable of providing information that may be generally required by the FSA and specifically in regard to incidents and alerts.

5.9.2 The officers' local knowledge of the district database, together with other electronic documents used in connection with food and feed law enforcement services, was subject to end of day back-up to prevent the loss of data.

## **5.10 Food Premises Database**

5.10.1 The Authority had developed a documented procedure for the registration of food premises and updating the premises database. The Authority's prime mechanisms for maintaining the accuracy of the database were;

- Cross checking information supplied from business rates to identify new businesses
- Officers' local knowledge of the district
- Officers identifying new businesses or change of ownership during inspections and when carrying out other enforcement duties.

5.10.2 Information entered on the database was also controlled by restricted access for deleting premises.

5.10.3 Auditors were advised the Authority were in the process of scanning relevant documents onto the premises database but these had not always appropriately linked to individual premises. An action plan had been produced in conjunction with the service provider to address this issue. The Service was able to demonstrate officers still had access to hard copy files to help inform decisions for future interventions in the meantime.

5.10.4 Auditors had prior to the audit randomly selected 6 food establishments located in the authority's area from the Internet. One of the food establishments included was outside the district but the remainder were on the food establishments database and included in the intervention programme. The premises hard copy files detailing the interventions were retrievable.

## **5.11 Liaison with other Organisations**

5.11.1 The Authority had good liaison arrangements in place with officers attending regional food and sampling groups and regional environmental health managers groups which included representatives from other relevant bodies.

## **5.12 Internal Monitoring**

- 5.12.1 The Authority had developed a documented qualitative and quantitative procedure for monitoring of food hygiene law enforcement activities. Regular appropriate risk based internal monitoring is essential to maintain the quality and effectiveness of the Service.
- 5.12.2 Auditors discussed the range of internal monitoring currently being carried out across the Service which included reviews of officer inspection records, enforcement notice checklists and accompanied inspections. It was recommended that current arrangements are expanded to cover all aspects of the Service, including alerts and incidents.
- 5.12.3 Quantitative monitoring of workloads included running quarterly reports to monitor progress with the planned food premises intervention programme and regular one to ones with officers to monitor workloads and progress.
- 5.12.4 Auditors discussed the importance of ensuring that sufficient time and resources were provided to maintain comprehensive risk based internal monitoring across the Service. The resources required to deliver and maintain effective internal monitoring should be included in any service planning arrangements.

## **5.13 Local Authority Views on Arrangements for Incidents and Alerts**

- 5.13.1 At the conclusion of the audit the Authority was asked to provide some feedback on the arrangements in place for incidents and alerts at the Agency and associated statutory guidance. The Authority provided a comprehensive set of responses which will be fed into the summary of the audit programme on alerts and incidents.

## **5.14 Issues Outside the Scope of the Audit**

- 5.14.1 Auditors became concerned about the level of FTE authorised food officer (0.7) currently available to deliver official controls. The officer is restricted from the seizure and detention of foods and auditors discussed the need to maintain sufficient competent resource to deliver the food law enforcement service in accordance with the FLCoP.
- 5.14.2 Auditors were advised the intention was to replace the HRS (who was no longer a practicing food officer and did not currently meet the minimum CPD requirements) as lead food officer with the recently appointed team leader. This was subject to the officer meeting the FLCoP competency requirements following a period of training and acquiring experience. Auditors discussed the officer's return to delivering official controls on an incremental basis subject to the ongoing assessment of competency in accordance with the FLCoP.

- 5.14.3 According to the Service Plan the Authority had 803 food establishments and 395 were due an intervention in 2015/16. Auditors were assured by the HRS that the delivery of official controls would be supported by the use of a contractor during this transitional period and that the planned intervention programme for category A- D risk rated premises was being delivered in accordance with the FLCoP. Auditors discussed the need to include details in the Service Plan of the alternative enforcement strategy for the lower risk rated premises.
- 5.14.4 A copy of the Authority's full database was provided to allow a full assessment to be made of the current intervention programme which confirmed premises were generally being inspected at the required frequency in accordance with the FLCoP with only a very low number of overdue category C-E rated premises.
- 5.14.5 Auditors discussed the need to follow up the unauthorised enforcement notice action taken in one approved establishment in respect of the shelf life of a product and advised contact with policy colleagues in the FSA Hygiene Delivery Branch to discuss the issue of shelf life determination and the required appropriate controls further. More immediate follow up was also advised in respect of another approved establishment to determine the outcome of previous action required of the food business operator concerning the HACCP Plan and microbiological criteria sampling required in accordance with EC Regulation No 2073/2005.

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## ANNEX A - Hart District Council – Action Plan

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
5.1.6 (i) Ensure that Service Plans include a clear comparison of the resources required to carry out the full range of statutory food law enforcement activities against the resources available to the Service. [The Standard - 3.1]	April 2016	To include FTEs dedicated to the Food Service in Service Plan for 2016/17.	Feedback provided to portfolio holder & senior leadership on need to provide more detail in service plan for 16/17
5.1.6 (ii) Ensure that Service Plans include a statement in relation to the Authority's policy on handling food alerts to confirm it complies with the Food Law Code of Practice [The Standard -3.1 ]	April 2016	To include reference to food alerts and incidents in Service Plan for 2016/17.	Feedback provided to portfolio holder & senior leadership on need to provide more detail in service plan for 16/17
5.1.6 (iii) Ensure that the Service has a sufficient number of suitably qualified, experienced and competent officers to carry out the work set out in the Food Service Plan. [The Standard – 5.3]	May 2016	Environmental Health Technical Officer (EHTO) to undertake PPP in order to become registered EHO (Dec 2016). Other EHTO to undertake Higher Certificate Log Book to enable officer to undertake Official Food Controls (May 2016).	Contractor employed to carry out food hygiene inspections until March 2016.  Lead Officer has undertaken extensive refresher training in order to comply with FLCoP.  New EHO is qualified but needs to be trained and mentored Re: competency.
5.2.9 (i) Document its response to and the outcome of each food alert [The Standard -14.3]	Completed	Revision of current procedure whereby food alerts for Action will be raised as a Service Request and actions documented on database as appropriate.	Team Leader will raise Service Request when alerts for action received.

5.2.9 (ii) Review the documented procedure for food alerts and incidents to ensure it contains the details required by the Food Law Code of Practice. [The Standard 14.1 & 14.4]	December 2015	Further scrutiny and inter-authority verification of procedure to be carried out.	Procedure reviewed in light of changes to FLCoP 2015.
5.2.9 (iii) Maintain up to date accurate records in retrievable form on all food establishments in its area in accordance with the Food Law Code of Practice. [The Standard 16.1 ]	December 2015	QA system to be reviewed to ensure full compliance.	Staff instructed to link all documents and correspondence to database as standard process.
5.4.3 Review and develop its Sampling Policy and Procedure to include suitable links to its alerts and incidents procedure.[The Standard 12.3]	December 2015	Review of policy and procedure to comply with FLCoP and to include alerts and incidents.	
5.5.4 Review and implement its documented enforcement procedures in accordance with the FLCoP and official guidance. [The Standard- 15.2& 15.3]	March 2016	To review enforcement procedures to ensure full compliance with FLCoP 2015. On-going programme.	All food officers re-briefed on enforcement & authorisation procedures. Any enforcement action ratified by EH Team Leader or HoS in advance.
5.7.5 Review the authorisation of food officers to ensure they are appropriately authorised under all relevant current legislation in accordance with their individual level of qualification, experience and competency. [The Standard – 5.3]	Completed and ongoing	To review qualifications and competency in line with requirements of FLCoP 2015. It is also intended to have a fully implemented policy and procedure by 5 April 2016 which is consistent with all other Hampshire Authorities through liaison with the County Food Advisory Committee.	Authorisations have been reviewed and re-issued in line with FLCoP.



## **ANNEX B - Audit Approach/Methodology**

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

- (1) Examination of LA plans, policies and procedures.
- (2) A range of LA file records were reviewed.
- (3) Review of Database records
- (4) Officer interviews

## **ANNEX C Glossary**

Authorised officer	A suitably qualified officer who is authorised by the local authority to act on its behalf in, for example, the enforcement of legislation.
Codes of Practice	Government Codes of Practice issued under Section 40 of the Food Safety Act 1990 as guidance to local authorities on the enforcement of food legislation.
County Council	A local authority whose geographical area corresponds to the county and whose responsibilities include food standards and feeding stuffs enforcement.
District Council	A local authority of a smaller geographical area and situated within a County Council whose responsibilities include food hygiene enforcement.
Environmental Health Officer (EHO)	Officer employed by the local authority to enforce food safety legislation.
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	The Framework Agreement consists of: <ul style="list-style-type: none"><li>• Food and Feed Law Enforcement Standard</li></ul>

- Service Planning Guidance
- Monitoring Scheme
- Audit Scheme

The **Standard** and the **Service Planning Guidance** set out the Agency's expectations on the planning and delivery of food and feed law enforcement.

The **Monitoring Scheme** requires local authorities to submit yearly returns via LAEMS to the Agency on their food enforcement activities i.e. numbers of inspections, samples and prosecutions.

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

Full Time Equivalents (FTE)	A figure which represents that part of an individual officer's time available to a particular role or set of duties. It reflects the fact that individuals may work part-time, or may have other responsibilities within the organisation not related to food and feed enforcement.
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.
Service Plan	A document produced by a local authority setting out their plans on providing and delivering a food service to the local community.
Trading Standards	The Department within a local authority which carries out, amongst other responsibilities, the enforcement of food standards and feeding stuffs legislation.
Trading Standards Officer (TSO)	Officer employed by the local authority who, amongst other responsibilities, may enforce food standards and feeding stuffs legislation.
Unitary Authority	A local authority in which the County and District

Council functions are combined, examples being Metropolitan District/Borough Councils, and London Boroughs. A Unitary Authority's responsibilities will include food hygiene, food standards and feeding stuffs enforcement.