

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

South Norfolk Council
9-10 March 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>

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1. Introduction

- 1.1 This report records the results of an audit at South Norfolk Council with regard to food hygiene enforcement, under relevant headings of the Food Standards Agency Food Law Enforcement Standard. The audit focused on the Authority's arrangements for the management of 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 South Norfolk Council 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.

Scope of the Audit

- 1.4 The audit examined South Norfolk Council'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 Civic Centre, Swan Lane, Long Stratton, on 9 - 10 March 2010.

Background

- 1.6 South Norfolk is a mainly rural area in East Anglia with a population of 115,300, of which approximately 40,000 reside in rural locations, whilst the remainder live in market towns or on the outskirts of Norwich. The district's economy is influenced by the proximity of Norwich, which is the regional centre. The majority of businesses are small, with only 5% employing more than 25 people.
- 1.7 There are approximately 1,137 food establishments in the district. The majority of food businesses are retail or catering businesses. There are a small number of specialist food manufacturers including micro – breweries. There were 15 establishments in the Authority's area which required approval under Regulation (EC) No. 853/2004.
- 1.8 The Food and Health and Safety Team were responsible for enforcing food hygiene legislation in the District. The team was also responsible for health and safety enforcement, infectious disease investigations and animal health licensing.
- 1.9 The profile of South Norfolk Council's food businesses as of 31 March 2009 was:

Type of food premises	Number
Primary Producers	5
Distributors/Transporters	28
Manufacturers/Packers	31
Retailers	224
Restaurant/Caterers	849
Total number of food premises	1,137

2. Executive Summary

- 2.1 The Authority had implemented a Food Service Plan for 2009/2010 that was in line with the Service Planning Guidance in the Framework Agreement. Since the plan had been drafted officers had been allocated various additional non-food enforcement duties which had resulted in a significant decrease in the full time equivalent officers (FTE) available to carry out food law enforcement activities. Future Service Plans should provide a clear comparison of the staff resources required to deliver the food enforcement service against the staff resources available to the Authority.
- 2.2 The Authority had developed and implemented policies and procedures covering all areas within the scope of the audit. An effective system for the review of these policies and procedures was in place and a number of these had been recently updated.
- 2.3 The Authority had a procedure for the authorisation of officers, which took account of officer qualifications, experience and competency. There was potential to expand the authorisations of officers to reflect their current experience and competence, as not all officers were authorised across the full range of their operational duties.
- 2.4 Officer training and qualifications records confirmed that the Authority had provided adequate training for officers commensurate with their tasks and in accordance with the specified levels of continuing professional development (CPD) training requirements in the Food Law Code of Practice. Officers had recently received update training on HACCP evaluations.
- 2.5 Audit checks on records of food hygiene inspections and other actions confirmed that file records were well organised and easily retrievable. The inspection aide-memoire on the files had undergone review in response to the recommendations of the Pennington Public Inquiry report.
- 2.6 Record checks confirmed that officers were carrying out comprehensive inspections and providing detailed records of findings, in particular recording the progress of the business in complying with procedures based on HACCP. A letter was provided to the food business operator in all cases, and appropriate follow-up action was being taken, such as the service of hygiene improvement notices (HIN).
- 2.7 The files for approved establishment files were examined as part of the audit. There was insufficient information on the files particularly in relation to the evaluation of HACCP systems. The use of appropriate inspection aides-memoire specific to the approval activity would prompt

officers to capture further information on the operation of these establishments. In addition the files required review to ensure they contain the information required by Annexe 12 of the Food Law Code of Practice Guidance.

- 2.8 Records of food and food establishment complaints made to the Authority were examined and it was evident that all complaints had been thoroughly investigated.
- 2.9 The Authority had a documented sampling policy and procedure in addition to a sampling programme. File checks showed that appropriate follow-up actions had been taken in all cases of unsatisfactory samples and food business operators had been informed of outcomes.
- 2.10 The Authority was in the process of reviewing and updating their Enforcement Policy. It was clear that the Authority had adopted a graduated approach to enforcement and was using appropriate and effective enforcement powers, including the use of hygiene improvement notices, simple cautions and prosecution.
- 2.11 The Authority had developed an internal monitoring procedure which related to interventions. In practice, monitoring was undertaken across the range of food law enforcement activities and the procedure would benefit from amendment to reflect this. In addition it was suggested that the quantity of monitoring carried out could be rationalised to reflect the competence and experience of individual officers.
- 2.12 An interview with an officer and a reality check visit to a food business were undertaken during the audit. The officers concerned could demonstrate a clear understanding of the key aspects of carrying out an inspection and the assessment of the adequacy of a food safety management system (FSMS).

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 2009/2010 which had been drawn up broadly in line with the Service Planning Guidance in the Framework Agreement. The Plan had been agreed by Members in July 2009. It included the risk profiles of food establishments within the Authority's area but did not include details of the proposed intervention programme for the year. Any improvements identified in the Service Plan were integrated into the Food Team and Directorate Plans. The Team Plan contained targets against National Indicator 184 of 'Broadly Compliant'.
- 3.1.2 The strategic aim of the Service was 'committed to ensuring that food that is produced, sold and consumed in South Norfolk is safe and without risk to health'. The Food Service Plan set out aims and objectives for key elements of the Service:
- Food Hygiene –to ensure traders comply with legal standards for hygiene in food premises, supported by the objective 'Food in South Norfolk is safe to eat'
 - Health Improvement –to improve health and welfare of South Norfolk's residents supported by the objective 'To protect public health by judicious regulatory activity'.
- 3.1.3 The Food Law Enforcement Plan also had direct links into the objectives of the Corporate Plan 2009/2010:
- Be businesslike and efficient providing services people value the most
 - Make South Norfolk a culturally and economically richer place to live
 - Improve the health and wellbeing of everyone who lives or works in South Norfolk.
- 3.1.4 The Authority had completed a review against the 2008/2009 Service Plan. They had set a nominal base target of 80% of establishments that were broadly compliant against National Indicator (NI) 184. The estimated performance had exceeded 95%.
- 3.1.5 The Food Law Enforcement Plan for 2009/2010 declared that there were 5.0 full time equivalent officer posts (FTE) allocated to food law enforcement. However there had been significant changes since the Plan had been published which had impacted on the officer resources available to carry out food law enforcement duties. Of the four officers currently within the team:

- one had been seconded to another unit for a proportion of the week
- another had taken on the responsibility of carrying out all animal health licensing inspections
- the manager of the unit was due to commence responsibility for management of the Authority's health and safety function, playground and amenity inspections, commons officer management, in addition to car parks and on street parking within the Authority and an adjoining local authority.

Recommendation

3.1.6 The Authority should:

Ensure that future Food Law Enforcement Plans are in line with the Service Planning Guidance in the Framework Agreement, and include details of the inspection programme for the year and the staffing resources required to provide the food law enforcement service, compared with the staffing resources available to the Authority. [The Standard – 3.1]

Documented Policies and Procedures

3.1.7 The Authority had recently reviewed some of their procedures which covered the range of food law enforcement activities. All procedures were incorporated into a Food Team Protocol Manual, which was available electronically and in hard copy. Auditors were advised that individual officers within the Food Team had responsibility for the development or review of procedures as required, which was usually as a result of changes to guidance. The recently reviewed documents had been dated to improve version control.

Officer Authorisations

3.1.8 The Authority had reviewed their procedure on the authorisation of officers in 2010. The procedure stated that Directors were each authorised within the Authority's policy framework. The Director was able to delegate this authority to other officers within the Authority. The Food Team Manager was responsible for maintaining the authorisation of officers in line with their competency, qualifications and training. Each officer was assessed by the Team Manager and an authorisation was produced which was signed by the Director. It was apparent that there was potential to expand the level of authorisation to officers in line with their current procedure, to enable them to carry out a greater range of enforcement work.

- 3.1.9 Auditors were advised that an annual performance review system for officers was in place where training needs were discussed. This process also fed into the assessment of competence and subsequently the level of officer authorisations. There was evidence that when officers had attended external training courses the training was cascaded back into the team during team meetings.
- 3.1.10 It was clear that the Authority was proactive in providing training opportunities for officers as well as secondments to increase their experience. All authorised officers had achieved the required minimum 10 hours relevant training, based on the principles of continuing professional development. In terms of specific training on HACCP issues, it was noted that officers had attended training in 2009 and 2010 on a number of courses provided by external organisations.
- 3.1.11 Audit checks confirmed that evidence of all officers' qualifications was available and that copies of relevant qualification certificates had been retained by the Authority and were current.

3.2 Food Premises Inspections

- 3.2.1 The Authority's Food Enforcement Service Plan did not provide details of the number of establishments that would be subject to interventions for 2009/2010.
- 3.2.2 The Authority had developed and implemented an aide-memoire used for interventions at food establishments. This had undergone review in response to the recommendations arising from the Pennington Report. The form detailed the assessment officers would make when evaluating FSMS.

Good Practice – Inspection Records

The Authority had reviewed and trialled an aide-memoire form to capture information relating to FSMS based on HACCP principles. Although the form had only recently been finalised, it would enable officers to record comprehensive detail in relation to the evaluation of HACCP.

- 3.2.3 File and database record checks confirmed that the Authority was implementing an effective risk based food premises inspection programme, and premises were being inspected at the frequency set out in the Food Law Code of Practice.
- 3.2.4 Letters were sent to all food business operators (FBOs) following an intervention, which in general contained the details required by the Food Law Code of Practice and differentiated between legal requirements and recommendations of good practice. Auditors discussed the potential use of Record of Inspection forms to reduce the burden on the amount of correspondence officers had to undertake at the outcome of an intervention. This was especially pertinent due to the high percentage of establishments that were risk rated as Category 'E'. The Authority was considering the introduction of an Alternate Enforcement Strategy in respect of these establishments.
- 3.2.5 Where contraventions were identified, letters indicated that a revisit would take place to ensure that they had been adequately addressed by the FBO. These included those establishments with an absence of an FSMS. It was evident that timely revisits had been undertaken to establishments where necessary. Records of revisits also indicated that where the FBO had failed to address contraventions, there had been consideration of a more formal enforcement approach to secure compliance.

- 3.2.6 Files for three approved establishments in the Authority's area were examined during the audit. The approval documents for all establishments were found within the files. The inspection findings had not routinely been recorded on prescribed aides-memoire specific to the type of establishment and it was not therefore always clear that the establishment had been inspected to ensure compliance with the specific requirements of Regulation (EC) No. 853/2004, or the basis of the officer's assessment of compliance, in particular, whether the business had implemented an effective FSMS based on HACCP.

Recommendation

- 3.2.7 The Authority should:

Use an appropriate product based aide-memoire to capture information in establishments subject to approval under Regulation (EC) No. 853/2004, including the assessment of the compliance of premises and systems, particularly in relation to HACCP based food safety management systems. [The Standard – 7.2, 7.3 and 7.4]

- 3.2.8 The approved establishment files did not contain the relevant business and operations information as recommended in Annexe 12 of the Food Law Practice Guidance. In addition they did not contain in all cases detailed information to advise subsequent interventions on the operation of the establishment, e.g. a synopsis, up-to-date HACCP plans, and insufficient information on emergency withdrawal/recall procedures, which would be important in the event of a food safety incident.

Verification Visit to a Food Premises

- 3.2.9 During the audit, a verification visit was undertaken to a local restaurant 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.
- 3.2.10 During the visit it was noted that the FBO had allowed the FSMS records to lapse and the new kitchen assistant was unaware of any

FSMS in place. The FBO appeared to rely upon the chef to complete FSMS documents. The issues found indicated a poor overall understanding of the principles of a FSMS. Previous interventions recorded in the file clearly showed progressive action taken by the Authority and there was clear evidence of the actions the officer had taken in an attempt to ensure compliance at the last visit.

3.3 Enforcement

- 3.3.1 The Authority had developed an enforcement policy which was generally in accordance with centrally issued guidance. The Service confirmed that they were in the process of reviewing the Policy which was being undertaken by the Food and Safety Manager.
- 3.3.2 There were examples of formal enforcement actions being taken by officers in relation to failures by the FBO in providing an adequate FSMS. The records for three relevant HINs were examined during the audit. The wording of the notices provided a clear indication of the reasons for the contravention and the full extent of the remedial works required.

Good Practice – Enforcement

The Authority had created an Investigation and Enforcement Action Report form which the investigating officer had to complete. This gave a summary of the investigation, whether the officer had considered the lines of defence and mitigation as well as final consideration against the Enforcement Policy.

In addition the Authority had developed an Enforcement Risk Assessment form which the investigating officer completed to guide them through to an enforcement action decision.

- 3.3.3 The Authority had also taken a prosecution against a business in relation to the absence of a FSMS and other food safety issues. The action taken was found to be appropriate and followed due legal process. The prosecution file contained a substantial amount of appropriate evidence to support the contraventions.

3.4 Internal Monitoring and Third Party or Peer Review

Internal Monitoring

- 3.4.1 The Service had recently reviewed their internal monitoring procedure, however it did not include that the Authority were in practice monitoring a number of elements of their enforcement activity through their database system. All interventions carried out by officers were monitored and the auditors discussed the potential to reduce the quantity of the monitoring where justified.

Recommendation

- 3.4.2 The Authority should:

Expand its internal monitoring procedure to include the monitoring of all areas of food law enforcement activity that are currently been undertaken by the Authority.
[The Standard – 19.1 and 19.2]

- 3.4.3 In practice internal monitoring of the quantity of interventions was undertaken. Quarterly reports were raised from the database and any outstanding interventions were discussed with officers and allocated or re-programmed. The local targets and results against National Indicator 184 of broadly compliant establishments were monitored by the manager of the Food Team.

Food and Food Premises Complaints

- 3.4.4 The Authority had developed and implemented a policy and procedure for the investigation of food and food premises complaints. The records for five complaint investigations relating to potential FSMS issues were examined. These confirmed that in all cases, complaints were appropriately investigated and follow-up action taken as necessary. Complaint records were found to be complete and accurate. The Authority provided guidance for consumers on their website on how to report food complaints to the Authority.

Food Sampling

- 3.4.5 The Authority had developed and implemented a policy and procedure for food sampling. The Authority was participating in local and national food sampling programmes.

- 3.4.6 Audit checks of two unsatisfactory sample results were carried out. These confirmed that in all cases, samples were appropriately investigated and follow-up action taken as necessary. Sample records were found to be complete and accurate.

Third Party or Peer Review

- 3.4.7 Auditors were informed that no recent formal inter-authority audits had taken place in the area. Officers had participated in some consistency exercises organised by the Norfolk Food Group.

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ANNEXE A

Action Plan for South Norfolk Council

Audit date: 9-10 March 2010

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.1.6 Ensure that future Food Law Enforcement Plans are in line with the Service Planning Guidance in the Framework Agreement, and include details of the inspection programme for the year and the staffing resources required to provide the food law enforcement service, compared with the staffing resources available to the Authority. [The Standard – 3.1]</p>	<p>31/07/10</p>	<p>Review the Council’s Food Law Enforcement plan and include details of the food premises inspection plan for the year 2010/2011.</p> <p>Submit the Council’s Food Law Enforcement Plan on the Council’s website.</p> <p>Publicise the Food Law Enforcement Plan on the Council’s website.</p>	
<p>3.2.7 Use an appropriate product based aide-memoire to capture information in establishments subject to approval under Regulation (EC) No. 853/2004, including the assessment of the compliance of premises and systems, particularly in relation to HACCP based food safety management systems. [The Standard – 7.2, 7.3 and 7.4]</p>	<p>30/06/10</p>	<p>Adapt product specific inspection forms that are used for approved establishments, so as to incorporate an aide-memoire within the one form.</p>	
<p>3.4.2 Expand its internal monitoring procedure to include the monitoring of all areas of food law enforcement activity that are currently been undertaken by the Authority. [The Standard – 19.1 and 19.2]</p>	<p>31/05/10</p>	<p>Produce and implement a documented procedure for the internal monitoring of all aspects of food safety enforcement.</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 Law Enforcement Plan 2009/2010
- Team Plan 2009/2010
- Food Team Protocol Manual
- Authorisation of Officers Procedure
- Food Team Protocol for the Inspection of Food Businesses
- Food Safety Enforcement Policy and associated enforcement Procedures
- Food Premises Inspection/Intervention procedure and aide-memoire
- Food Complaints Procedure
- Internal Monitoring Procedure
- Food Sampling Procedure.

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

- General food premises inspection records
- Approved establishment files
- Food complaint records
- Food sampling records
- Formal enforcement records.

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

- Audit Liaison Officer
- 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 an officer to a local food business. The purpose of the visit was to verify the outcome of the last inspection carried out by the Local Authority and to assess the extent to which enforcement activities and decisions met the requirements of relevant legislation, the Food Law Code of Practice and official guidance, having particular 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 and Critical Control Point – a food safety management system used within food businesses to identify points in the production process where it is critical for food safety that the control measure is carried out correctly, thereby eliminating or reducing the hazard to a safe level.
LAEMS		Local Authority Enforcement Monitoring System is an electronic system used by local authorities to report their food law enforcement activities to the Food Standards Agency.
Member forum		A local authority forum at which Council Members discuss and make decisions on food law enforcement services.
Metropolitan Authority		A local authority normally associated with a large urban conurbation in which the County and District Council functions are combined.
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.