



Food Standards Agency in Northern Ireland

Report on the Audit of Food Standards Food Law Enforcement Controls Delivered by Local Authorities in Northern Ireland

Foreword

Audits of local authorities' food law enforcement services are part of the Food Standards Agency's (FSA) 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 (LA) regulatory functions are principally delivered through their Environmental Health Services.

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

FSA 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. The Framework Agreement and the audit protocols are available on the Agency's website at:

<http://www.food.gov.uk/enforcement/auditandmonitoring/>

The main aim of the audit scheme is to improve and maintain 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 information to inform Agency policy on food safety.

The report contains some statistical data on food law enforcement activities undertaken by the authority. The FSA's website contains enforcement activity data for all UK local authorities and can be found at: <http://www.food.gov.uk/enforcement/auditandmonitoring/>

The report also contains an action plan, prepared by the Authority, to address the audit findings.

A glossary of technical terms used within the audit report can be found at Annexe C.

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1.0 INTRODUCTION

1.1 Reason for the Audit

1.1.1 The primary purpose of FSA audits of Enforcement Authorities is to provide assurance that local delivery of official controls for feed and food is compliant with EU and UK legal requirements and official guidance. The detailed guidelines for the conduct of audits of competent authorities are set out in an EC Decision of September 2006¹.

1.1.2 In Northern Ireland, the power to set standards, monitor and audit Enforcement Authorities' food law enforcement services was conferred on the FSA by The Food Standards Act 1999² and The Official Feed and Food Controls (Northern Ireland) Regulations 2009³. The audit will be undertaken under section 12 of the Act and regulation 7 of the Regulations.

1.1.3 The Framework Agreement on Local Authority (LA) Food Law Enforcement⁴ sets out the arrangements through which the FSA audits LA enforcement activities to help ensure that LAs are providing an effective service to protect public health.

1.1.4 The overarching aims of the audit scheme are to:

- Help to protect public health by promoting effective local enforcement of food law
- Maintain and improve consumer confidence
- Assist in the identification and dissemination of good practice to aid consistency
- Provide information to aid the formulation of FSA policy
- Promote conformance with the '*Food Law Enforcement – Standard*' and any relevant central guidance or Codes of Practice
- Provide a means to identify underperformance in LA food law enforcement
- Promote self-regulation and peer review
- Identify continuous improvement

1.1.5 The Food Standards Agency in Northern Ireland (FSA in NI) has provided support and resources specifically targeting the food standards activities carried out by councils in Northern Ireland. This programme of focused

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

² [Food Standards Act 1999 c.28](#)

³ [SR 2009/427 - The Official Feed and Food Controls Regulations \(Northern Ireland\) 2009](#)

⁴ [Chapter 5 of the Framework Agreement on Local Authority Food Law Enforcement: 'Audit Scheme'](#)

audits has been developed to assess the impact of providing this additional support and resource to LAs in Northern Ireland.

- 1.1.6 Strabane District Council (Strabane DC) was included in the FSA's programme of audits of local authority food law enforcement services; because of the length of time since it had last been audited by the Agency.

1.2 Scope and objectives of the audit

- 1.2.1 The audit examined Strabane DC's arrangements for food standards controls.
- 1.2.2 The audit scope included the assessment of local arrangements for service planning, delivery and review, provision and adequacy of officer training and authorisations, implementation and effectiveness of food standards activities, including inspection, sampling, and enforcement. Maintenance and management of appropriate records in relation to food standards activity in the council's area and internal service monitoring arrangements were also covered.
- 1.2.3 The on-site element of the audit took place at the Council's office at 47 Derry Road, Strabane, BT82 8DY on 29 and 30 November 2012. The audit included a reality check to assess the effectiveness of official controls implemented by the Council at Food Business Operators (FBOs) in the Council's area and, more specifically, the checks carried out by the Council's officers to verify compliance with food standards law requirements.

1.3 Background

- 1.3.1 Strabane DC area covered some 862 square kilometres and has a resident population of 40, 100(2010 census). This made Strabane district the 4th largest council by area but ranked 21st of 26 in population density. The council was located in County Tyrone, on the western edge of Northern Ireland.
- 1.3.2 The main council offices were located in the town of Strabane. Apart from Strabane the other smaller towns in the area include Plumbridge, Newtownstewart, Donemana, Sion Mills, and Castlederg. Also included in the Strabane District Council area were the rural areas of Glenmornan, Evish, Glebe, Artigarvan, and Ballymagorry
- 1.3.3 There were 415 registered food businesses within the Strabane DC area including hotels, restaurants, takeaways, schools meals kitchens, residential homes, home caterers and hot food vans. There were four EC

Approved establishments within the District, three of them being food manufacturing establishment and the other being a standalone cold store.

- 1.3.4 Following local government reorganisation in Northern Ireland in 1973 a statutory grouping system was set up to support district councils. This system consisted of four regional groups covering the 25 smaller district councils in Northern Ireland. Belfast City Council due to its size was not included in the statutory grouping system.
- 1.3.5 Strabane DC was a constituent council of Western Group Environmental Health Service (WGEHS) which provided co-ordination, monitoring, and support to its constituent councils, Derry City Council, Fermanagh District Council, Limavady Borough Council, Omagh District Council, and Strabane District Council.

2.0 EXECUTIVE SUMMARY

- 2.1** Strabane DC had developed a Service Plan for Food Law Enforcement for 2012/13, approved by relevant members in September 2012. The Plan detailed the scope of the service and included reference to its food standards responsibilities. The plan had been drawn up in line with Service Planning Guidance in the Framework Agreement.
- 2.2** The Council ensured officers were appropriately authorised to carry out enforcement activities and had a specific list of legislation which was maintained by Western Group Environmental Health Committee. File checks showed officers had more than the required 10 hours continuing professional development training and appropriate training.
- 2.3** In general, food standards controls including interventions such as inspections and sampling were carried out appropriately. However one high risk establishment had not been inspected at the appropriate frequency.
- 2.4** Strabane DC had developed and implemented policies and procedures covering all areas within the scope of the audit. The Council had well maintained records in relation to the majority of food standards controls which were detailed and easily retrievable.
- 2.5** In the majority of cases procedures provided instructions and guidance regarding food standards interventions and sampling. However a number of procedures needed to be reviewed to fully comply with centrally issued guidance and relevant codes of practice.
- 2.6** The Council had implemented internal monitoring of its food standards activities; however the auditors could not verify through record checks the full range of internal monitoring activities.

3.0 AUDIT FINDINGS

3.1 Organisation and Management

Strategic Framework, Policy and Service Planning

- 3.1.1 The Council had developed a documented Service Plan for Food Law Enforcement 2012/13. The service plan made specific reference to the arrangements regarding food standards activities. The service plan for food law enforcement 2012/2013 had been approved by the Council on 17 September 2012.
- 3.1.2 The Plan followed the service planning guidance in the Framework Agreement and contained information on the scope of the service. The scope specifically mentioned food standards controls under the following functions:
- Aims and objectives
 - Scope of the food service
 - Demands on the Food Service
 - Inspections of Food Premises
 - Food Sampling Programmes
- 3.1.3 The Plan set out the financial allocation for the delivery of the Council's food service. The financial allocation included the cost of samples, training, and the provision of legal services.
- 3.1.4 The service plan indicated a total staffing allocation of 3.0 Full Time Equivalent (FTE) authorised officers for food safety work (including management and strategic functions). This included additional resource through a Service Level Agreement with WGEHS. The Service Level Agreement was based on a financial split between the five constituent councils.
- 3.1.5 Strabane DC had carried out a review against performance of its Service Plan for 2011/2012. This included the identification of any variances in service delivery and consequent areas for improvement in 2012/2013.

Documented Policies and Procedures

- 3.1.6 The Council had developed and implemented a range of relevant policies and procedures as part of a documented quality management system. Controlled reference copies of the documents were available to relevant staff and to the auditors.

Authorised Officers

- 3.1.7 The Council's Scheme of Delegation had been revised in July 2000. The Scheme of Delegation authorised the Chief Executive and the Chief

Environmental Health Officer to discharge its functions relating to the authorisation of staff in, or acting on behalf of the Environmental Health Department.

- 3.1.8 Strabane DC had developed and implemented a documented policy and procedure for the authorisation of enforcement officers with respect to food safety.
- 3.1.9 The policy and procedure set out the means by which officers were authorised based on their qualifications, experience, and competency. Audit checks on officers carrying out food standards official controls confirmed that authorisations had been conferred generally under the European Communities Act 1972, and specifically under the Regulations relating to food made under that Act. However the Council's list of legislation used to specifically authorise officers contained references to revoked legislation.

Recommendation

- (i) The Council should review the list of specific legislation used by Strabane DC. The Council should also consider including the specific list of food standards legislation contained in 3.4.4 of the Food Law Practice Guidance (Northern Ireland) October 2012 (FLPG).

The Authority shall set up, maintain and implement a documented procedure for the authorisation of officers based on their competence and in accordance with the relevant Codes of Practice and any centrally issued guidance.

[The Standard – 5.1]

- 3.1.10 Officer training and development opportunities were identified initially through each officer's personal development plan with external input from WGEHS.
- 3.1.11 Audit checks confirmed that officer qualification and training records were comprehensive and well maintained. In all cases examined, officers had received significantly more than the required 10 hours training to maintain their professional competency and had received training on food controls. The record keeping arrangements in relation to officer qualifications and training were accurate, complete, and readily retrievable.
- 3.1.12 The Council took part in the out of hours on call service for the investigation of food and water borne infectious disease emergencies. The service was co-ordinated by WGEHS and was provided by the five constituent councils.

Facilities and Equipment

- 3.1.13 Strabane DC had in place a computer software system capable of providing accurate food law enforcement monitoring data to the Agency. The auditors confirmed this through an examination of the food establishment database.
- 3.1.14 The Council had documented procedures for accessing the food establishment database and secure storage of the database. However the auditors noted that there was no process in place to verify the information held on the food establishment database.

Recommendation

- (ii) The Council should implement a process to verify the information held on its food database that ensures the information is accurate, reliable, and up to date. The process should be proportionate to the amount of users and the number of entries made and also identifies who has specific responsibility for ensuring the integrity of the food establishment database.

The Authority shall set up, maintain and implement a documented procedure to ensure that its food and feed premises database is accurate, reliable and up to date, as the accuracy of such databases is fundamental to service delivery and monitoring.

[The Standard – 11.2]

Liaison with other organisations

- 3.1.15 Strabane DC had liaison arrangements with central government, other enforcement bodies, and professional organisations. This was achieved in part through the Council's participation as a constituent council in WGEHS.

3.2 Food Standards Control Activities

Food Establishments Interventions and Inspections

- 3.2.1 The Council's Food Service Plan for 2012/13 provided the following details of the Council's planned food standards inspections.

RISK CATEGORY AND NO. OF PREMISES	INSPECTION FREQUENCY	NUMBER OF INSPECTIONS	NUMBER OF HOURS PER INSPECTION	TOTAL HRS
A (8)	12 months	8	4	32
B (45)	24 months	23	3	69
C (340)	**			
		31		101

***Premises in Category C for food standards don't have to be included in a planned inspection programme but should be subject to an alternative enforcement strategy at least once every five years.*

3.2.2 The Council had a documented procedure for carrying out food standards inspections. The FLPG details a number of different aspects of interventions and in particular inspections which councils should consider when preparing a procedure on interventions at food businesses. The auditors noted the food standards inspection procedure did not contain a reference to how the council deals with:

- New establishment inspections (FLPG - 4.1.4)
- Announced / unannounced inspections (FLPG - 4.2.2)
- Use of experts (FLPG – 4.2.3)

Recommendation

(iii) The Council should review its food standards procedure to ensure it contains a reference to how it deals with:

- New establishment inspections (FLPG - 4.1.4)
- Announced / unannounced inspections (FLPG - 4.2.2)
- Use of experts (FLPG – 4.2.3)

The Authority shall set up, maintain and implement documented procedures for the range of interventions/inspections/it carries out.

[The Standard – 7.4]

3.2.3 The auditors examined the establishment file records in relation to food standards official control activities for three establishments and in the majority of cases records were easily found and retrieved.

3.2.4 In all cases examined food establishment inspections were recorded on detailed inspection aide memoirs which provided adequate information on the areas examined during each inspection. In the majority of cases the council had carried out food standards inspections to the frequency required by the FLCoP. However one category A establishment had not had a food standards inspection to the frequency required by the FLCoP.

Recommendation

(iv) The Council should ensure interventions at high risk food business establishments are carried out at appropriate intervals in accordance with the prescribed frequencies specified in Annex 5 of the Food Law Code of Practice (Northern Ireland) April 2012 (FLCoP).

The Authority shall carry out interventions/inspections (as required by the relevant Code of Practice) at all food hygiene, food standards and feedingstuffs establishments in their area, at a frequency which is not less

than that determined under the intervention rating schemes set out in the relevant legislation, Codes of Practice or other centrally issued guidance. [The Standard – 7.1]

- 3.2.5 However, at the time of audit the auditors could not find two examples of food business establishment / food premises interventions report (Annex 6 reports) which were used to report in writing to the food business operator either at the conclusion of the official control or as soon as practicable thereafter, even if the outcome was satisfactory. The two Annex 6 reports were subsequently provided to the auditors after the on site visit to the Council.

Recommendation

- (v) The Council should ensure records of food business establishment / food premises interventions report (Annex 6 reports) are easily retrievable.

The Authority shall maintain up to date accurate records in retrievable form on all food and feed establishments in its area, and for all relevant checks on imported food and feed, in accordance with Codes of Practice and centrally issued guidance. These records shall include reports of all interventions / inspections, the determination of compliance with legal requirements made by the authorised officer, details of action taken where non-compliance was identified, details of any enforcement action taken, results of any sampling, details of any complaints and any action taken, and also relevant food and/or feed registration and approval information. The authority should also record, with reasons, any deviations from set procedures.

[The Standard – 16.1]

- 3.2.6 The auditors also noted the risk rating following a food standards inspection in 2012 had led to a change in the food standards intervention rating category from A to B. However, the reasons for revising the rating had not been recorded on the establishment file. This was required by point 4.1.5.1.5 of the FLCoP.
- 3.2.7 Also, Strabane DC's internal monitoring of food enforcement activities procedure required the Senior EHO to authorise the new rating. However, the procedure covered food hygiene inspection rating changes and not ratings that changed following food standards inspections.

Recommendation

- (vi) The Council should include in its procedures a process for recording and reviewing the reason for revising a rating following a food standards inspection, similar to the requirement the council has in place for revising a rating following a food hygiene inspection. The council should also ensure the reasons for revising the rating are recorded on the establishment file, as required under 4.1.5.1.5 of the FLCoP.

The Authority shall maintain up to date accurate records in retrievable form on all food and feed establishments in its area, and for all relevant checks on imported food and feed, in accordance with Codes of Practice and centrally issued guidance. These records shall include reports of all interventions / inspections, the determination of compliance with legal requirements made by the authorised officer, details of action taken where non-compliance was identified, details of any enforcement action taken, results of any sampling, details of any complaints and any action taken, and also relevant food and/or feed registration and approval information. The authority should also record, with reasons, any deviations from set procedures.

[The Standard – 16.1]

- 3.2.8 Where appropriate the Council had corresponded by letter with FBOs. In all cases examined the letters had detailed contraventions and recommendations and made a clear distinction between legal requirements and recommendations of good practice as stated in 4.2 of the FLCoP.

Food Sampling

- 3.2.9 Strabane DC had a food sampling policy specifically for food standards controls. The auditors noted the food sampling policy took into account the home/originating authority principle, food complaints, national or regional surveys and special investigations. It should also be noted that the Council's sampling programme for 2012 did refer to the possible impact of complaint samples and province wide Northern Ireland Food Liaison Group (NIFLG) surveys on the programme.
- 3.2.10 The Council also had documented procedures which provided guidance on routine chemical sampling. The procedures also covered bacteriological sampling.
- 3.2.11 The auditors examined the records and results for four chemical samples and noted all had been taken by appropriately authorised officers. The official laboratory appointed by the Council for food standards sampling activities were properly accredited in accordance with relevant centrally issued guidance.

- 3.2.12 The Council had developed a Food Sampling Programme for 2012. The programme was specific with regard to specific FBOs and the nature of the products to be sampled.
- 3.2.13 The records of four samples were examined. All samples had been taken by authorised officers and in all cases the FBO was informed of the sample results.

Enforcement

- 3.2.14 The Council Environmental Health Department had a specific food standards enforcement policy which was based on guidance contained in Codes of Practice and other guidance notes. Its stated aim was to 'ensure that foods and food packaging meet relevant standards for quality, composition and labelling, presentation and advertising and that reputable food businesses are not prejudiced by unfair competition'.
- 3.2.15 Strabane DC had carried out some enforcement activity which related to food standards controls in the last two years. Specifically in relation to one voluntary surrender. The auditors also noted the Council had one prosecution pending in relation to food standards.

Food Complaints, Primary Authority Scheme, and Home Authority Principle

- 3.2.16 Strabane DC had developed a procedure for food complaints. While the auditors did not review specific food complaints we did review the council's food complaints procedure. The procedure detailed how the Council carried out investigations into food complaints. However it did not cover complaints against establishments and also needed to state how the Agency was notified when a complaint became a serious, localised hazard as required by 2.4.2 of the FLCoP.

Recommendation

- (vii) The Council should ensure its food complaints procedure addresses complaints against establishments and notifying the Agency.

The Authority shall set up, maintain and implement a documented policy and procedure(s) in relation to complaints about food and feed that originate within the UK, and those foods and feed originating from other EU member states, or from third countries and in relation to complaints against feed and food establishments. Procedures should cover any referral arrangements to inland authorities and/or authorities with responsibility for imported food and feed controls at the UK point of entry.

[The Standard – 8.1]

3.2.17 The Council's Service Plan confirmed support for the Home Authority Principle. The Council had identified eight establishments to which they would provide support. The Council had not entered into formal Home Authority partnerships with these establishments.

Verification Visit to a Food Establishment

3.2.18 During the audit a verification visit was carried out at a local food establishment with the authorised officer who had carried out a previous food standards inspection at the establishment. The purpose of the visit was to determine the effectiveness of the Council's assessment of food standards including risk assessment, composition and labelling and traceability.

3.2.19 During the visit, the officer demonstrated an adequate understanding of the food standards controls required for the establishment and conducted an adequate review of the establishment including the types of products, activities carried out, storage areas, production areas, receipt, and dispatch.

3.3 Internal Monitoring

3.3.1 The Council had developed and implemented a documented procedure for the internal monitoring of the food enforcement activities within the Environmental Health Department. The procedure detailed the qualitative and quantitative areas which the Senior Environmental Health Officer (SEHO) was responsible for monitoring.

3.3.2 However the auditors were not able to verify those monitoring checks which were carried out on electronic records for example written correspondence, food complaints, IT reports.

Recommendation

(viii) The Council should ensure its internal monitoring process ensures a record of monitoring is maintained for all internal monitoring activities including monitoring checks carried out on records maintained electronically.

A record shall be made of all internal monitoring. This should be kept for at least 2 years.

[The Standard – 19.3]

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Annexe A – Action Plan

Audit Date: 29-30 November 2012

RECOMMENDATION	PLANNED IMPROVEMENTS	DUE DATE
<p>(i) The Council should review the list of specific legislation used by Strabane DC. The Council should also consider including the specific list of food standards legislation contained in 3.4.4 of the Food Law Practice Guidance (Northern Ireland) October 2012 (FLPG).</p> <p>The Authority shall set up, maintain and implement a documented procedure for the authorisation of officers based on their competence and in accordance with the relevant Codes of Practice and any centrally issued guidance.</p> <p>[The Standard – 5.1]</p>	<p>Western Group Environmental Health Service has reviewed the list of food legislation. This is now available on the Western Group Intranet site which can be accessed by the Constituent Councils within Western Group.</p> <p>The list will be updated on a quarterly basis.</p>	<p>Completed</p>
<p>(ii) The Council should implement a process to verify the information held on its food database that ensures the information is accurate, reliable, and up to date. The process should be proportionate to the amount of users and the number of entries made and also identifies who has specific responsibility for ensuring the integrity of the food establishment database.</p> <p>The Authority shall set up, maintain and implement</p>	<p>The Council has drawn up a procedure to verify that the information held on its food database is accurate, reliable, and up to date.</p> <p>This will entail the Senior EHO carrying out a number of specific checks on a 6 monthly basis to verify the accuracy of information held on the database. Checks to include internet searches, checking local newspapers/magazines for business adverts,</p>	<p>Completed</p>

RECOMMENDATION	PLANNED IMPROVEMENTS	DUE DATE
<p>a documented procedure to ensure that its food and feed premises database is accurate, reliable and up to date, as the accuracy of such databases is fundamental to service delivery and monitoring.</p> <p>[The Standard – 11.2]</p>	<p>planning lists, entertainment licence applications etc.</p> <p>There will continue to be ongoing surveillance by Officers while out on the District as to premises opening/closing, local information etc.</p>	
<p>(iii) The Council should review its food standards procedure to ensure it contains a reference to how it deals with:</p> <ul style="list-style-type: none"> – New establishment inspections (FLPG - 4.1.4) – Announced / unannounced inspections (FLPG - 4.2.2) – Use of experts (FLPG – 4.2.3) <p>The Authority shall set up, maintain and implement documented procedures for the range of interventions/inspections/it carries out</p> <p>[The Standard – 7.4]</p>	<p>The Council has reviewed its Food Standards Inspection Procedure so that Officers will have due regard to Sections 4.1.4, 4.2.2, and 4.2.3 of the FLPG before carrying out food standards inspections.</p>	Completed
<p>(iv) The Council should ensure interventions at high risk food business establishments are carried out at appropriate intervals in accordance with the prescribed frequencies specified in Annex 5 of the Food Law Code of Practice (Northern Ireland) April 2012 (FLCoP).</p> <p>The Authority shall carry out</p>	<p>The Council will ensure that interventions at high risk food establishments are carried out at appropriate intervals by having the Admin staff print out a list of all outstanding food standards inspections on the first working day of the month in addition to the list of planned inspections for that particular month.</p> <p>These lists are given to the Senior EHO on the first working day every month.</p>	Completed

RECOMMENDATION	PLANNED IMPROVEMENTS	DUE DATE
<p>interventions/inspections (as required by the relevant Code of Practice) at all food hygiene, food standards and feedingstuffs establishments in their area, at a frequency which is not less than that determined under the intervention rating schemes set out in the relevant legislation, Codes of Practice or other centrally issued guidance.</p> <p>[The Standard – 7.1]</p>		
<p>(v) The Council should ensure records of food business establishment / food premises interventions report (Annex 6 reports) are easily retrievable.</p> <p>The Authority shall maintain up to date accurate records in retrievable form on all food and feed establishments in its area, and for all relevant checks on imported food and feed, in accordance with Codes of Practice and centrally issued guidance. These records shall include reports of all interventions / inspections, the determination of compliance with legal requirements made by the authorised officer, details of action taken where non-compliance was identified, details of any enforcement action taken, results of any sampling, details of any complaints and any action taken, and also relevant food and/or feed registration and approval information. The authority should also</p>	<p>The Council will ensure that Annex 6 Report forms are easily retrievable. This will be achieved by Officers being reminded that a copy of the Annex 6 Report form is to be filed in the particular premises file following each planned inspection/intervention.</p>	<p>Completed</p>

RECOMMENDATION	PLANNED IMPROVEMENTS	DUE DATE
<p>record, with reasons, any deviations from set procedures.</p> <p>[The Standard – 16.1]</p>		
<p>(vi) The Council should include in its procedures a process for recording and reviewing the reason for revising a rating following a food standards inspection, similar to the requirement the council has in place for revising a rating following a food hygiene inspection. The council should also ensure the reasons for revising the rating are recorded on the establishment file, as required under 4.1.5.1.5 of the FLCoP.</p> <p>The Authority shall maintain up to date accurate records in retrievable form on all food and feed establishments in its area, and for all relevant checks on imported food and feed, in accordance with Codes of Practice and centrally issued guidance. These records shall include reports of all interventions / inspections, the determination of compliance with legal requirements made by the authorised officer, details of action taken where non-compliance was identified, details of any enforcement action taken, results of any sampling, details of any complaints and any action taken, and also relevant food and/or feed registration and</p>	<p>The existing Internal Monitoring procedure relating to the revision of a rating following a food hygiene inspection has been amended to include food standards category A and B establishments.</p> <p>The Senior EHO will ensure that the reasons for revising the rating are recorded on the premises file by the Officer who carried out the inspection. These will be signed off by the Senior EHO in authorising the downgrade if deemed appropriate.</p>	<p>Completed</p>

RECOMMENDATION	PLANNED IMPROVEMENTS	DUE DATE
<p>approval information. The authority should also record, with reasons, any deviations from set procedures.</p> <p>[The Standard – 16.1]</p>		
<p>(vii) The Council should ensure its food complaints procedure addresses complaints against establishments and notifying the Agency.</p> <p>The Authority shall set up, maintain and implement a documented policy and procedure(s) in relation to complaints about food and feed that originate within the UK, and those foods and feed originating from other EU member states, or from third countries and in relation to complaints against feed and food establishments. Procedures should cover any referral arrangements to inland authorities and/or authorities with responsibility for imported food and feed controls at the UK point of entry.</p> <p>[The Standard – 8.1]</p>	<p>A report will be taken to the June 2013 Council Committee meeting recommending that Council adopt the new NIFLG Food Complaints Procedure The new procedure addresses the issues of complaints against establishments and notifying FSANI when required, which weren't included in the previous NIFLG Food Complaints Procedure.</p>	<p>June 2013</p>
<p>(viii) The Council should ensure its internal monitoring process ensures a record of monitoring is maintained for all internal monitoring activities.</p> <p>A record shall be made of all internal monitoring.</p>	<p>Records that were maintained electronically i.e.: written correspondence following inspections/interventions, will now be kept as hard copies and, as per the existing internal monitoring procedure, 10% of these will be checked and signed off by the Senior EHO.</p>	<p>Completed</p>

RECOMMENDATION	PLANNED IMPROVEMENTS	DUE DATE
This should be kept for at least 2 years. [The Standard – 19.3]	All other monitoring checks will continue to be maintained in hard copy format.	

Annexe B - Audit Approach / Methodology

(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 2012-2013
- Minutes of the Corporate & Regulatory Services Committee 17 September 2012
- Strabane DC Food Standards Enforcement Policy
- Authorisation Procedure including scheme of delegation
- Access to and secure storage of premises database
- Food complaints investigation procedure
- Food sampling policy – food standards
- Routine chemical and bacteriological sampling procedure
- Chemical sampling programme for 2012
- Food standards enforcement policy
- Council internal monitoring of food enforcement activities procedure
- Recent food team meeting minutes

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

- Authorisations
- Qualifications and training files
- Food standards inspection records
- Sampling records
- Internal monitoring records

(3) Interviews – the following officers were interviewed:

- Audit Liaison Officer – Senior EHO
- WGEHS PEHO

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 one of the Council's officers to a food establishment within Strabane DC's area. The purpose of the visit was to verify that appropriate risk based, proportionate food standards official controls were carried out.

Annexe C - Glossary

Audit	Audit means a systematic and independent examination to determine whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.
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 (CoP)	Government Codes of Practice issued under Section 40 of the Food Safety (NI) Order 1991 as guidance to local authorities on the enforcement of food legislation.
Environmental Health Officer (EHO)	Officer employed by the local authority to enforce food safety legislation.
Food Business Operator (FBO)	This refers to the natural or legal persons responsible for ensuring that the requirements of food law are met within the food business under their control.
Food hygiene	The legal requirements covering the safety and wholesomeness of food.
Food Law Code of Practice (Northern Ireland) April 2012	Article 39 of the Food Safety (NI) Order 1991 (the Order), Regulation 22 of the Food Hygiene Regulations (NI) 2006 and Regulation 6 of the Official Feed and Food Controls Regulations (NI) 2009, which empower the Department of Health Social Services and Public Safety to issue codes of practice concerning the execution and enforcement of that legislation by district councils. This code is issued as guidance to Local Authorities on the enforcement of food legislation. It relates to Northern Ireland only.
Food standards	The legal requirements covering the quality, composition, labelling, presentation and advertising of food, and materials in contact with food.
Food Standards Agency	The Food Standards Agency is an independent

(FSA)	<p>Government department set up by an Act of Parliament in 2000 to protect the public's health and consumer interests in relation to food.</p> <p>Everything we do reflects our vision of Safe Food and Healthy Eating for all.</p>
Formal samples	<p>Samples taken in accordance with the requirements of the Food Law Code of Practice in accordance with the relevant sampling regulations and submitted to an accredited laboratory on the official list.</p>
Framework Agreement	<p>The Framework Agreement consists of:</p> <p>Chapter One Service Planning Guidance</p> <p>Chapter Two The Standard</p> <p>Chapter Three Monitoring of Local Authorities</p> <p>Chapter Four Audit Scheme for Local Authorities</p> <p>The Standard sets out the Agency's expectations on the planning and delivery of food law enforcement.</p> <p>The Monitoring Scheme requires Local Authorities to submit an annual return 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 law enforcement services of Local Authorities against the criteria set out in The Standard.</p>
Full Time Equivalent (FTE)	<p>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.</p>
Home Authority	<p>An authority where the relevant decision making base of an enterprise is located and which has taken on the responsibility of advising that business on food safety/food standards issues.</p> <p>Acts as the central contact point for other enforcing</p>

	authorities' enquiries with regard to that company's food related policies and procedures.
Informal samples	Samples that have not been taken in accordance with the appropriate sampling regulation (e.g. samples for screening purposes) and/or not sent to an accredited laboratory.
LAEMS	Local Authority Enforcement Monitoring System is an electronic system used by local authorities to report their food law enforcement activities to the Food Standards Agency.
Local Authority (LA)	an organization that is officially responsible for all the public services and facilities in a particular area.
Member forum	A local authority forum at which Council Members discuss and make decisions on food and feed law enforcement services.
Northern Ireland Food Liaison Group (NIFLG)	NIFLG is a sub-group of the Chief Officers Group (CEHOG), acts on behalf of 26 district councils in Northern Ireland as a co-ordinating body for the Food Control function, and consists of food specialist officers from each of the four Group areas in Northern Ireland, Belfast City Council, a district council representative, and a representative from the Food Standards Agency in Northern Ireland.
POAO	Products of animal origin. Animal derived products that fall under the requirements of the veterinary control regime.
Practice Guidance	Guidance issued by the Food Standards Agency to assist district councils with the discharge of their statutory duty to enforce the Food Safety (NI) Order 1991, Regulations made under it, and food law made under the European Communities Act 1972.
Pre-visit Questionnaire (PVQ)	Used by FSA auditors to request information prior to an audit visit , to maximise the effectiveness of the time spent with a local authority.
Primary Authority	An authority that has formed a partnership with a

	business.
Public Analyst	An officer, holding the prescribed qualifications, who is formally appointed by the local authority to carry out chemical analysis of food samples.
RASFF	Rapid alert system for food and feed. The European Union system for alerting port enforcement authorities of food and feed hazards.
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.
Third Country	Countries outside the European Union.