

**Report on the audit of Official Controls on Feed  
of Non-Animal Origin (FNAO) and Feed  
Establishments  
Including Primary Producers**

London Borough of Bexley  
10-11 August 2016



## Foreword

The audit of local authority feed and food law enforcement services forms part of the Food Standards Agency's arrangements to improve consumer protection and confidence in relation to food and feed. These arrangements recognise that the enforcement of UK food and feed law relating to food safety, hygiene, composition, labelling, imported food and feeding stuffs is largely the responsibility of local authorities (LAs). The LA regulatory functions for animal feed controls are principally delivered through their Trading Standards Services.

Agency audits assess local authorities' conformance against the Feed and Food Law Enforcement Standard 'the Standard', which was published by the Agency as part of the Framework Agreement on Official Feed and Food Controls by Local Authorities (amended April 2010), a Feed Law Code of Practice (England) (published May 2014) and a Feed Law Practice Guidance (England) (updated June 2014).

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. Local authority audit schemes are also implemented by the Agency's offices in Wales and Northern Ireland.

Following a review of the delivery of official controls for feed law enforcement the FSA introduced a new feed delivery model (NFDM)<sup>1</sup> in April 2014 to promote consistency, efficiency and value for money in the delivery of feed official controls. This delivery model has been implemented in association with the National Trading Standards (NTS) and it promotes a regional approach to delivery, coordinated by NTS.

An innovation of the NFDM was the introduction of a system of 'earned recognition' whereby Feed Business Operators (FeBOs) who demonstrably maintained high standards of feed safety by taking appropriate steps to comply with the law, may have these standards recognised by LAs when determining the frequency of their official controls.

This programme of focused audits is being undertaken to provide assurance to the FSA that the new feed delivery model has been effectively implemented by local authorities and that official controls, as laid down in the Agency's Feed Law Enforcement Code of Practice, Practice Guidance and Framework Agreement, in

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[https://khub.net/documents/portlet\\_file\\_entry/5524476/New+Feed+Delivery+Model+06.07.2016.pdf/2e8585ff-3e92-4362-928a-5d1b6da2f594?download=true](https://khub.net/documents/portlet_file_entry/5524476/New+Feed+Delivery+Model+06.07.2016.pdf/2e8585ff-3e92-4362-928a-5d1b6da2f594?download=true)

regard to FNAO are being carried out by LAs, in order to safeguard animal and public health.

This audit forms part of the programme of audits across a number of animal feed authorities and the findings will be incorporated into a summary report on the outcomes of the overall focused animal feed audit programme.

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

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## **1.0 Introduction**

- 1.1 This report records the results of an audit at London Borough of Bexley with regard to feed law enforcement. The audit was undertaken as part of the Agency's focused audit programme on feed controls in England. This report has been made publicly 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 Regulatory Delivery Division, please email [LAAudit@foodstandards.gsi.gov.uk](mailto:LAAudit@foodstandards.gsi.gov.uk) or phone 01904 232116.

### **Reason for the Audit**

- 1.2 The power to set standards, monitor and audit local authority feed and food law enforcement services was conferred on the Food Standards Agency by the Food Standards Act 1999 and the Official Feed and Food Controls (England) Regulations 2009. This audit of London Borough of Bexley was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme. The Agency has taken account of the European Commission guidance<sup>2</sup> on how such audits should be conducted.
- 1.3 Regulation (EC) No. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law, includes a requirement for competent authorities to carry out internal audits or to have external audits carried out. The purpose of these focused audits is to provide assurance to the FSA that the new feed delivery model has been effectively implemented by local authorities. The Agency has taken account of the European Commission guidance on how such audits should be conducted.
- 1.4 London Borough of Bexley was included in the Food Standards Agency's programme of audits of local authority feed law enforcement services, having not been audited for feed service delivery by the Agency in the past five years and was representative of a geographical mix of 11 local authorities selected across England.

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<sup>2</sup> Commission Decision of 29 September 2006 setting out the guidelines laying down criteria for the conduct of audits under Regulation (EC) No. 882/2004 of the European Parliament and of the Council on official controls to verify compliance with feed and food law, animal health and animal welfare rules (2006/677/EC)

## **Scope of the Audit**

- 1.5 The audit examined London Borough of Bexley systems and procedures for the control of feed of non- animal origin (FNAO).
- 1.6 The audit scope included an assessment of local arrangements for implementing the NFDM and included:
- Feed service planning, delivery and review
  - Competence of officers
  - Implementation and effectiveness of feed control activities
  - Maintenance and management of appropriate feed premises database and records in relation to official controls at feed business premises
  - The Lead Officer role for feed
  - The Regional Lead role for feed
  - Accuracy and delivery of official reports to the Agency
- 1.7 The on-site element of the audit took place at the Authority's office at Civic Offices, 2 Watling St, Bexleyheath, DA6 7AT from 10-11 August 2016.

## **Background**

- 1.8 London Borough of Bexley is a London borough in south-east London. It has common borders with a number of London Borough Councils and is within the Thames Gateway, an area designated as a national priority for urban regeneration. The borough has a population of 232,000 and covers an area of 23.38 square miles. .
- 1.9 The Authority had 25 registered feed businesses, consisting mainly of food businesses such as supermarkets, which divert surplus products or co-products to animal feed. There were no approved establishments.
- 1.10 The Trading Standards Service was responsible for the delivery of feed hygiene within the borough, and was based within the Public Protection Service. The Principal Trading Standards Officer appointed as the Lead Feed Officer (LFO) carried out feed delivery work as part of a broader spectrum of trading standards duties. These included activities such as underage sales, doorstep crime, and Primary Authority responsibilities. It was estimated time allocated to feed delivery work equated to 0.05 of a full time equivalent officer.
- 1.11 The Authority had faced financial pressures during the last few years which had resulted in reductions in tiers of management and front line

staff with the loss of 3 FTE Trading Standards Officers. We were advised further savings were required which could impact further on the Service.

- 1.12 The profile of London Borough of Bexley feed businesses as at 31 March 2015 according to their submitted enforcement return was as follows:

<b>Type of Feed Premises</b>	<b>Number</b>
Manufacturers and packers	5
Distributors/Transporters	0
Retailers	26
Co-products/surplus food	26
Stores	0
Arable farms	1
Livestock farms	1
Importers	0
<b>Total Number of Feed Premises</b>	<b>59</b>

## 2.0 Executive Summary

2.1 The Authority was generally delivering risk-based inspection planning and performing its lead officer role satisfactorily in terms of liaison and good communication with the Regional Coordinator for the Association of London Environmental Health Managers (Alehm). Alehm acted as the regional coordinating body for the delivery of feed official controls on behalf of the London Boroughs. However the Authority needed to make improvements to fully meet the requirements of the New Feed Delivery Model, Framework Agreement and the Feed Law Code of Practice (FELCP). A number of potential improvements in the overall arrangements and controls for feed service delivery were identified. The key strengths and areas for improvement for the LA are set out below.

### 2.2 Strength:

#### **Lead Feed Officer Roles – Liaison & Communication**

2.2.1 Despite the delivery of feed work being a low priority for the Authority the Lead Feed Officer had liaised effectively with the Regional Coordinator to ensure a programme of inspections was prioritised and undertaken at feed premises within the borough.

### 2.3 Key areas for improvement:

#### **Service Planning & Delivery**

2.3.1 The Authority had not developed a Service Plan for 2016/17 that detailed how it would deliver feed official controls within its area and the resources required. The Plan should include reference to the arrangements for the delivery of feed controls in accordance with the Feed Law Code of Practice and the New Feed Delivery Model, including reference to the Agency's National Enforcement Priorities.

#### **Registration & Database Accuracy**

2.3.2 The database of feed businesses lacked detail concerning the level of compliance score, total risk scores, next intervention date, earned recognition and membership of assured schemes. This needed to be reviewed in order to maintain database accuracy, identify premises with earned recognition, and ensure the effective use of limited official control resources for feed law enforcement.



### **Competency assessment and officer authorisation**

- 2.3.3 A documented procedure for the authorisation of officers based on their competency and qualifications was not in place. The extent and limitations of officers were not effectively defined in their authorisations.

### **Earned Recognition and AES Implementation**

- 2.3.4 Earned recognition and alternative enforcement strategies as defined by the Feed Law Code of Practice had not yet been implemented by the Authority, either in terms of procedure, strategy or reduced scheduled inspection frequency.

### **Internal Monitoring**

- 2.3.5 A documented internal monitoring procedure for the feed service to verify its conformance with the Standard, relevant legislation, Code of Practice, New Feed Delivery Model and other centrally issued guidance was not in place.

## **3.0 Audit Findings**

### **3.1 Feed service planning, delivery and review**

#### **Implementation of the Agency's National Feed Priorities document**

- 3.1.1 The Authority had not developed a Service Plan for 2016/17 that detailed how it would deliver feed official controls within its area and the resources required. Auditor's discussed the benefit of a Service Plan developed in accordance with the Service Planning Guidance in the Framework Agreement, including detailed information on the demands on the Service and to include a comparison of FTE available to the Service against what was needed to deliver official controls for feed.
- 3.1.2 The Plan should include reference to the arrangements for the delivery of feed controls in accordance with the Feed Law Code of Practice (FELCP) and the New Feed Delivery Model (NFDM), including reference to the Agency's National Enforcement Priorities (NEPs), with specific detail how these are to be integrated into the work of the Service.
- 3.1.3 Auditors were advised due to other demands placed on the Service the delivery of the NFDM was a low priority for the Authority. However the Service was able to demonstrate participation in the regional coordination of the NFDM through the Association of London Environmental Health Managers (Alehm) which coordinated feed activity on behalf of the 33 London Boroughs. The LA had invited the Regional Lead Feed Officer (RLFO) who had recently been appointed by Alehm to undertake the responsibilities set out in the NFDM, to participate in the audit discussions.
- 3.1.4 The RLFO advised Alehm had recently drafted an Animal Feed Protocol for consideration by the LAs in the region. This document set out the aims of Alehm, the feed work planned and division of responsibilities with LAs in the London region. This was currently being considered by the LA and if in agreement the LA would adopt and implement the Protocol. Auditors advised the Agency would be willing to review the document and provide comments where necessary.
- 3.1.5 Auditors were informed by the LFO that no consideration of the NEPs had been undertaken by the LA and the RLFO advised that further development work in this respect was needed by Alehm. Auditors discussed the benefits of including consideration of NEPs in the Protocol and how the stated priorities would influence the delivery of the Services' annual programme of official controls and more widely across the region.

- 3.1.6 In accordance with the regional organisation of feed delivery through Alehm, the LA supplied a list of their registered feed businesses for consideration for inclusion in the inspection programme as part of the desktop model survey. Alehm in consultation with the LA selected the most appropriate to be included in the annual intervention programme. The LA was then supported in the delivery of the feed official control inspections by contractors engaged by Alehm.
- 3.1.7 The Authority had not undertaken any sampling during the previous two years. Auditors indicated that the Service Plan would benefit from an outline of the LAs approach to sampling as part of the NFDM and against any specific part of the NEP's. The RLFO advised Alehm had produced a regional sampling programme for 2016/17.
- 3.1.8 The Authority showed a willingness to take part in regional and nationally organised projects and had participated in a national pilot project regarding the disposal of surplus food and feed arrangements with relevant businesses such as supermarkets.

**Recommendation 1 - Service planning**

[The Standard 3.1]

[The Feed Law Code of Practice 5.1}

[The National Feed Enforcement Priorities 2016/17]

Draw up, document and implement a feed service delivery plan in accordance with the Service Planning Guidance in the Framework Agreement and the Feed Law Code of Practice.

**Effectiveness of the implementation and monitoring of earned recognition for feed establishments**

- 3.1.9 The Authority advised auditors that no feed premises had yet become due an intervention under earned recognition (ER). Auditors were informed that Alehm on behalf of the LAs in the region were mainly undertaking initial inspections in order to determine the compliance level of feed businesses and were in the process of implementing Type 1 and Type 2 ER where appropriate. The LA's spreadsheet for feed premises maintained by the LFO did not reflect the risk rating or the next inspection date so it was not possible to assess this aspect during the audit. Auditors were informed this information was held centrally by Alehm. In order to improve the records held by the LA, auditors discussed the benefit of incorporating additional information such as the level of

compliance (LOC) score, total risk scores, next intervention date, ER and membership of assured schemes on the LA's spreadsheet.

- 3.1.10 Auditors were advised the system of removing ER on receipt of notifications from FSA and assured schemes was undertaken centrally by Alehm. The LA did not have access to Red Tractor or Agriculture Industries Confederation (AIC) websites and was not aware if Alehm had access. The LFO was not familiar with the requirement to notify the FSA of exception reports of those feed businesses with LOC scores less than satisfactory and that were also members of an approved assurance schemes. However the RFLO was able to confirm awareness of this process and that no such reporting had been necessary to date.

**Recommendation 2 – Earned recognition & database management**

[Feed law Code of Practice, Chapter 5.3]  
[The Standard, paragraph 11.2]

Review the database spreadsheet of feed businesses to incorporate additional information such as the LOC score, total risk scores, next intervention date, ER and membership of assured schemes, with a view to recognising earned recognition, maintaining database accuracy and ensuring the efficiency of use of limited feed official control resources.

**Promotion of the importance of feed hygiene**

- 3.1.11 Auditors were informed that due to the demands on the Service no specific promotional work had been undertaken and the LA had not planned any promotional events for feed in 2016/17.

**3.2 Competence of officers**

- 3.2.1 There was no evidence of a process of assessment of competency in accordance with the FELCP for the LFO and the contractor engaged by the Authority. Auditors were advised that the Authority had not implemented the LAs annual staff appraisal system for Trading Standards Officers and the LFO self-managed his training needs. This involved completion of a personal learning and development plan administered by the Chartered Trading Standard Institute (CTSI). This process enabled individual officer training needs to be identified and monitored, including those specific to feed law enforcement.

- 3.2.2 File checks also showed that the LFO had been sufficiently and appropriately trained for feed law enforcement in accordance with their level of authorisation. Based on the principles of continuous professional development (CPD) the LFO and the contractor had received 10 hours annual CPD in accordance with the FELCP. Officer training records had been maintained by the officer but a copy of the qualification was not available at the time of the audit .It was noted update HACCP training had been programmed in for 2016/17. It was not possible to assess the qualification of the contractor used by the LA to carry out inspections as the auditors were advised this was held by Alehm.
- 3.2.3 The LFO had been authorised by the Authority based on their experience, qualifications and competence. However auditors noted that officer authorisations were generic and included reference to old or superseded legislation and some legislation relevant to feed official controls was not included. Auditors advised the Service to review the legislation to ensure it is up to date and complete to enable implementation of feed law enforcement powers. It was noted that specific authorisation detailing the extent and limitations of officers' powers in relation to their feed duties under the Animal Feed (Hygiene, Sampling and Enforcement) Regulations 2015, had not been carried out, contrary to advice from the Food Standards Agency and the Standard in the Local Authority Framework Agreement on Feed and Food.
- 3.2.4 Auditors were informed the contractor engaged by Alehm to assist the LA with inspections had not been authorised by the LA and was accompanied by the LFO on the inspections.
- 3.2.5 Auditors were advised there were no authorisation procedures and discussed the need to set up, maintain and implement a documented procedure for the authorisation of officers, including contractors, based on their competence and in accordance with the FELCP.

**Recommendation 3 – Competency Assessment and Authorisation of Officers**

[The Standard, paragraph 5.1 and 5.3]

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 level of authorisation and duties of officers should be consistent with their qualifications, training, experience and the relevant Code of Practice.

- 3.2.6 Auditors discussed with the LFO the benefit of registering with and engaging on the Agriculture Community Knowledge Hub forum to assist with keeping their feed knowledge up to date

### **3.3 Implementation and effectiveness of feed control activities**

#### **Inspection**

- 3.3.1 The Service had been utilising model template inspection forms developed by the FSA for carrying out inspections and was using the FSA risk rating scheme. File checks on a sample of inspections carried out showed that apart from one exception, feed premises had been effectively and consistently risk rated.
- 3.3.2 An audit check of five premises files found that registration activity codes had been correctly determined and that generally compliance had been fully assessed against the regulations. Sufficiently detailed observations on inspection had been made and inspection records were retrievable. Auditors noted some of the legislation referenced was out of date and the reports did not include all the information as set out in 2.3 of the Feed Law Practice Guidance (England). In all cases a record of intervention was left with the feed business operator and copied to the relevant Primary Authority where appropriate.
- 3.3.3 Generally the inspections checked were first inspections so auditors were unable to assess the frequency of inspection. As previously referenced in this report due to the lack of LOC score recorded on the database it was not possible to determine the next due inspection date.
- 3.3.4 Generally the inspections were carried out by the contractor who acted as an advisor and was accompanied by the LFO. File checks showed that on one occasion the contractor had carried out an inspection alone despite not being appropriately authorised. Auditors discussed the need to ensure that inspections are only carried out by an appropriately authorised officer. The LFO advised all reports were checked to ensure they were completed and risk rated by the contractor before scanning onto the database. Auditors were informed if further enforcement action was required this would be carried out by the LFO under advice where appropriate from Alehm.
- 3.3.5 The Service had no system in place to identify all feed establishments in the borough, but the LFO advised liaison was taking place with the Regional Coordinator concerning some additional potential co-product manufacturing premises they had identified within the borough. Auditors discussed the benefits of having a documented procedure to ensure that

the database is complete and accurate for all relevant feed premises in the borough.

### **Sampling**

- 3.3.6 The Service had adopted a Feed Sampling Policy from a neighbouring LA but there was no documented sampling procedure or programme in place. As already stated in this report, no sampling had been undertaken in the previous two years and the sampling programmed for 2016/17 had been produced for the region by Alehm. Auditors acknowledged due to the limited number of premises there was a limited number of suitable products to sample in line with the NEP's.

### **Alternative enforcement**

- 3.3.7 The LA had not developed a formal detailed alternative enforcement strategy (AES) to explain or describe its approach to AES in accordance with FELCP. As previously referenced Type 1 and Type 2 ER had not yet been fully implemented by the Authority as most of the inspections carried out in the region had been first inspections and therefore there had not been a need for the full implementation of AES. Consequently it was not yet possible to determine if Tier 1 or Tier 2 AES was appropriate. Auditors were advised Alehm had identified this as an area for further development in the draft Animal Feed Protocol.

#### **Recommendation 4 – Alternative enforcement**

[The Feed Law Code of Practice, paragraph 5.4 & 5.6]

[The Standard, paragraph 7.2]

[The New Feed Delivery Model]

Develop, document and implement an alternative enforcement strategy and procedure to control how official controls will be conducted at premises where the use of AES is prescribed by Annex 2 of the Feed Law Code of Practice.

### **Enforcement**

- 3.3.8 The Authority had a satisfactory Enforcement Policy in place. No feed law enforcement activities had been carried out within the previous two years.

## **Imports and 3rd Country Representatives**

- 3.3.9 The Authority was aware of the requirements surrounding imports and 3<sup>rd</sup> Country Representatives. The Authority had no points of entry or third country representatives or feed establishments dealing with feed specific to feed control measures operating in the area.

### **3.4 Maintenance and management of appropriate feed premises database and records**

- 3.4.1 As stated earlier in the report the Service feed database consisted of a spreadsheet which was maintained by the LFO but it had not developed a documented procedure to ensure the accuracy and completeness of the database. Improvements to the level of detail recorded on the database are referenced in Recommendation 2 of this report. Access to the database was managed by log-in requirements and auditors were advised the system was backed up corporately

#### **Recommendation 5 – Database review**

[The Standard, paragraph 11.2]

[See also chapter 3.1 of this report]

Set up, implement and maintain a documented procedure to ensure that the feed database is accurate, reliable and up to date, as the accuracy of such databases is fundamental to service delivery, monitoring and accurate reporting of data to the FSA.

### **3.5 The Lead Officer role for feed**

- 3.5.1 Lead officer arrangements were discussed in detail in terms of the responsibilities of the role for:
- feed programme bidding,
  - internal reporting,
  - ensuring staff training and competency,
  - liaison with other feed leads in the regions,
  - consistency, and
  - the dissemination of information to staff.
- 3.5.2 The LFO was aware the New Feed Delivery Model and was in the process of becoming more familiar with the requirements. The LFO was the only officer within the Authority involved with delivering feed official controls and evidence was provided of effective liaison with the Regional



Co-ordinator and newly appointed RFLO for support where appropriate. The LFO attended regional meetings when possible.

- 3.5.3 The Service had no documented procedure for the monitoring of feed law enforcement. As stated earlier in the report when work is undertaken by a contractor the inspection report was checked by the LFO before scanning onto the database. The feed work undertaken by the LFO was currently not monitored within the Authority. Auditors discussed the need for the Authority to consider appropriate contingency and succession planning for the feed work undertaken by the LFO.
- 3.5.4 The LFO had liaised with the Regional Co-ordinator at Alehm concerning the identification and allocation of premises for inclusion in the inspection programme and pilot project. Evidence was provided of good liaison and sharing of information from the Knowledge Hub by the Regional Coordinator concerning the pilot project and in respect of the planned inspection programme. The LFO advised the NFDM desktop model was completed for the LA by Alehm but he checked the premises selected for inspection before the programme started.
- 3.5.5 The LFO reported that no formal consistency exercises, peer review or internal audit had been carried out.

**Recommendation 6 – Internal monitoring**

[The Standard, paragraph 19.1 & 19.2]

Set up, implement and maintain a documented internal monitoring procedure for the feed service to verify conformance with the Standard, relevant legislation, Code of Practice, New Feed Delivery Model and other centrally issued guidance.

This procedure shall include the monitoring of inspection paperwork, including risk rating determination and update, and inspection data entry by feed officers.

**3.6 The Regional Lead role for feed**

- 3.6.1 Arrangements were discussed in detail in terms of the responsibilities of the role for:

Bidding and allocation  
Regional training needs assessment and delivery,  
Regional reporting to the FSA,  
Liaison with other feed leads and regulators in the region and nationally,

Consistency and the dissemination of information from the NAP representative and to other feed leads.

- 3.6.2 As previously mentioned Alehm had newly appointed a RFLO to undertake the duties in the NFDM and he was able to give some insight into how the NFDM was implemented across the region. Auditors discussed their role and plans for the future detailed in the Animal Feed Protocol. Auditors noted the RFLO was engaged as a contractor by Alehm and had had been proactive in supporting the LAs within the region with their expertise. This had for example consisted of reviewing the LFO's risk assessment of R7 supermarkets inspected as part of the pilot project. The RFLO was registered on the Knowledge Hub and was active on this forum.

### **3.7 Accuracy and delivery of official feed reports to the Agency**

- 3.7.1 The Service does not have any specific documented procedures for assessing the accuracy of official feed reports to the Agency. In practice annual feed returns are completed by the LFO based on the information recorded on the spreadsheet.
- 3.7.2 Alehm had responsibility for the filing of the Desktop Model document on a regional basis and also the quarterly updates. It was not possible to assess the accuracy of this in regard to the Authority as the returns do not divide the information into separate authorities.
- 3.7.3 Auditors discussed some inaccuracies noted on the annual feed return due to double recording of R07 feed premises. The LFO was advised the Agency was aware there was potential for this to happen and was reviewing how the columns are labelled.
- 3.7.4 No UKFSS return had been filed as no sampling had been carried out.

**Auditors:**                    **Chris Green**  
   Robert Hutchinson

**Technical Advisor:** Theo Hawkins

Food Standards Agency  
Regulatory Delivery Division

## ANNEX A - Action Plan for London Borough of Bexley

**Audit date: 10-11 August 2016**

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p><b>Recommendation 1 - Service planning</b>                      [The Standard 3.1]                      [The Feed Law Code of Practice 5.1}                      [The National Feed Enforcement Priorities 2016/17]</p> <p>Draw up, document and implement a feed service delivery plan in accordance with the Service Planning Guidance in the Framework Agreement and the Feed Law Code of Practice.</p>	<p>31st March 2017</p>	<p>We plan to draw up a feed service delivery plan in accordance with Service Planning Guidance in the Framework Agreement and the Feed Law Code of Practice.</p>	<p>No progress to date</p>
<p><b>Recommendation 2 – Earned recognition &amp; database management</b>                      [Feed law Code of Practice, Chapter 5.3]                      [The Standard, paragraph 11.2]</p> <p>Review the database spreadsheet of feed businesses to incorporate additional information such as the LOC score, total risk scores, next intervention date, ER and membership of assured schemes, with a view to recognising earned recognition, maintaining database accuracy and ensuring the efficiency of use of limited feed official control resources.</p>	<p>Completed and on-going.</p>	<p>Add extra columns in to include:</p> <ol style="list-style-type: none"> <li>1. Likelihood of compliance (Loc) score</li> <li>2. Total risk score</li> <li>3. Next visit date</li> <li>4. Earned recognition</li> <li>5. Assured scheme membership</li> </ol>	<p>All completed, database will be populated more fully following future inspections.</p>

<p><b>Recommendation 3 – Competency Assessment and Authorisation of Officers</b> [The Standard, paragraph 5.1 and 5.3]</p> <p>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 level of authorisation and duties of officers should be consistent with their qualifications, training, experience and the relevant Code of Practice.</p>	<p>31st March 2017</p>	<p>We plan to 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>No progress to date</p>
<p><b>Recommendation 4 – Alternative enforcement</b> [The Feed Law Code of Practice, paragraph 5.4 &amp; 5.6] [The Standard, paragraph 7.2] [The New Feed Delivery Model]</p> <p>Develop, document and implement an alternative enforcement strategy and procedure to control how official controls will be conducted at premises where the use of AES is prescribed by Annex 2 of the Feed Law Code of Practice.</p>	<p>31<sup>st</sup> March 2017</p>	<p>We plan to develop, document and implement an alternative enforcement strategy and procedure to control how official controls will be conducted at premises where the use of AES is prescribed by Annex 2 of the Feed Law Code of Practice</p>	<p>No progress to date</p>
<p><b>Recommendation 5 – Database review</b> [The Standard, paragraph 11.2] [See also chapter 3.1 of this report]</p> <p>Set up, implement and maintain a documented procedure to ensure that the feed database is accurate, reliable and up to date, as the accuracy of such databases is fundamental to service delivery, monitoring and accurate reporting of data to the FSA.</p>	<p>31st March 2017</p>	<p>We plan to set up, implement and maintain a documented procedure to ensure that the feed database is accurate, reliable and up to date</p>	<p>No progress to date</p>

<p><b>Recommendation 6 – Internal monitoring</b> [The Standard, paragraph 19.1 &amp; 19.2]</p> <p>Set up, implement and maintain a documented internal monitoring procedure for the feed service to verify conformance with the Standard, relevant legislation, Code of Practice, New Feed Delivery Model and other centrally issued guidance.</p> <p>This procedure shall include the monitoring of inspection paperwork, including risk rating determination and update, and inspection data entry by feed officers.</p>	<p>31st March 2017</p>	<p>We plan to set up, implement and maintain a documented internal monitoring procedure for the feed service to verify conformance with the Standard, relevant legislation, Code of Practice, New Feed Delivery Model and other centrally issued guidance</p>	<p>No progress to date</p>
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## **ANNEX B - Audit Approach/Methodology**

Audit resource was targeted at the key risk areas. We examined any relevant records, instructions, documents, and evaluated procedures and outcomes. We also conducted appropriate audit testing to form an opinion on the controls in place.

The approach consisted of desktop reviews of information requested from the LA in a pre-visit questionnaire, and a 2 day onsite audit consisting of:

- Examination of plans, policies and procedures.
- Examination of file records.
- Review of database records
- Interviews with local authority officers .

## **ANNEX C - Glossary**

Agricultural Analyst	A person, holding the prescribed qualifications, who is formally appointed by a local authority to analyse feed samples.
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 and feed legislation.
County Council	A local authority whose geographical area corresponds to the county and whose responsibilities include food standards and feeding stuffs enforcement.
Defra	The Department for Environment, Food and Rural Affairs. The Government Department designated as the central competent authority for products of animal origin in England.
District Council	A local authority of a smaller 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.
FNAO	Feed not of animal origin. Products that do not fall under the requirements of the veterinary control regime.
FVO	Food and Veterinary Office, part of the European Commission, based within the Directorate General for Health and Consumers.
Feed Law Enforcement Code of Practice	Government Codes of Practice issued under the Official Feed and Food Control Regulations.
Feeding stuffs	Term used in legislation on feed mixes for farm animals and pet food.
Food Examiner	A person holding the prescribed qualifications who undertakes microbiological analysis on behalf of the

	local authority.
Food/feed hygiene	The legal requirements covering the safety and wholesomeness of food/feed.
Food/feed standards	The legal requirements covering the quality, composition, labelling, presentation and advertising of food/feed, and materials in contact with food.
Framework Agreement	<p>The Framework Agreement consists of:</p> <ul style="list-style-type: none"> <li>• Food and Feed Law Enforcement Standard</li> <li>• Service Planning Guidance</li> <li>• Monitoring Scheme</li> <li>• Audit Scheme</li> </ul> <p>The <b>Standard</b> and the <b>Service Planning Guidance</b> set out the Agency's expectations on the planning and delivery of food and feed law enforcement.</p> <p>The <b>Monitoring Scheme</b> 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.</p> <p>Under the <b>Audit Scheme</b> the Food Standards Agency will be conducting audits of the food and feed law enforcement services of local authorities against the criteria set out in the Standard.</p>
Full Time Equivalent (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.
HACCP	Hazard Analysis and Critical Control Point – a food/feed safety management system used within food/feed businesses to identify points in the production process where it is critical for food/feed safety that the control measure is carried out correctly, thereby eliminating or reducing the hazard to a safe level.
Home Authority	An authority where the relevant decision making base of an enterprise is located and which has taken on the responsibility of advising that business on food and feed safety/ standards issues. Acts as the central contact point for other enforcing



	authorities' enquiries with regard to that company's food/feed 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.
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.
Port Health Authority (PHA)	An authority specifically constituted for port health functions including imported food and feed control.
Primary Authority	An authority that has formed a formal partnership with a business in accordance with the Regulatory Enforcement and Sanctions Act 2008.
Public Analyst	An officer, holding the prescribed qualifications, who is formally appointed by the local authority to carry out chemical analysis of food and feed 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/feed premises according to risk and determines how frequently those premises should be inspected.
Service Plan	A document produced by a local authority setting out their plans on providing and delivering a food/feed 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 employed by the local authority who,

Officer (TSO)	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.