

Report on the Audit of Food Law Service Delivery and Food Business Compliance

**City of London Corporation
30 November– 2 December 2015**



Foreword

Audits of local authorities' feed and food law enforcement services are 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. These local authority regulatory functions are principally delivered through their Environmental Health and Trading Standards Services.

The attached audit report examines the Local Authority's Food Law Enforcement Service. The assessment includes the local arrangements in place for database management, inspections of food businesses and internal monitoring. 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.

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 Official Feed and Food Controls by Local Authorities and is available on the Agency's website at:
www.food.gov.uk/enforcement/auditandmonitoring.

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 in Wales and Northern Ireland .

The report contains some statistical data, for example on the number of food premises inspections carried out annually. The Agency's website contains enforcement activity data for local authorities and can be found at:
www.food.gov.uk/enforcement/auditandmonitoring.

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 the City of London Corporation 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 the food premises database, food premises interventions, and internal monitoring. The report has been made publicly available on the Agency's website at:

www.food.gov.uk/enforcement/auditandmonitoring/auditreports.

Hard copies are available from the Food Standards Agency's Operations Assurance 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 the City of London Corporation was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme.
- 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 audits is to verify whether official controls relating to feed and food law are effectively implemented. To fulfil this requirement, the Food Standards Agency, as the central competent authority for feed and food law in the UK has established external audit arrangements. In developing these, the Agency has taken account of the European Commission guidance on how such audits should be conducted.¹
- 1.4 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.

¹ 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 the City of London Corporation's arrangements for food premises database management, food premises interventions and internal monitoring, with regard to food hygiene law enforcement. 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.
- 1.6 Assurance was sought that key authority 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 Walbrook Wharf, 79 – 83 Upper Thames Street, London, EC4R 3TD on 30th November – 2nd December 2015.

Background

- 1.7 The City of London Corporation delivers official food controls in a unique area. The area is often referred to as the Square Mile as it is 1.12 square miles in area. The Port Health and Public Protection Department are located at offices in Walbrook Wharf which are also shared by the City's Police Force. The City of London is a major financial centre and there are approximately 392,400 people employed in the area, largely in the 251 international banks that are located there.
- 1.8 The Authority had a varied range of establishments within its area including Smithfield Market which has a typical throughput of 100, 000 tonnes of meat and allied products each year. Approximately 86% of the 1839 food businesses on the Authority's food premises database in 2015 were classified as restaurants and caterers including takeaways. The Authority did not have any food manufacturing businesses requiring approval under Regulation (EC) No. 853/2004 and those located at Smithfield fell to enforcement by the FSA with regard to food hygiene.
- 1.9 At the time of the audit the authority had just reorganised the teams delivering official food controls following an Authority-wide Service-Based Review, and two Commercial Teams had been created, responsible for enforcing legal requirements relating to food safety (standards and hygiene), occupational health & safety, statutory nuisances (other than noise) and the investigation infectious diseases arising from commercial activities. The Commercial Teams were also responsible for delivering

food standards and health & safety interventions at Smithfield Market and ensuring food hygiene is maintained in vehicles transporting product from the market. The teams also oversaw the processing and disposal of animal by-products produced on the market to prevent them from re-entering the human food chain. Prior to this change a Food Safety Team and a Smithfield Enforcement Team had been responsible for official food controls; it was this former structure that was outlined in the Food Service Plan for 2015-16. The Feedstuffs enforcement function in the City was carried out by the Trading Standards Team.

- 1.10 The profile of The City of London Corporation’s food businesses as at 31st March 2015 was as follows:

Type of Food Premises	Number
Primary Producers	0
Manufacturers/Packers (food standards)	45
Importers/Exporters	0
Distributors/Transporters	8
Retailers	201
Restaurant/Caterers	1585
Total Number of Food Premises	1839

2.0 Executive Summary

2.1 The Authority was selected for audit as it had not previously been audited by the Agency. The Authority was found to be delivering a range of food law enforcement activities in accordance with the statutory obligations placed on the Authority as a competent food authority. These were generally delivered according to prescribed timescales by experienced professional staff. However, some improvements were identified to enable the Service to attain the required level of protection to consumers and in order to meet the statutory requirements of the Framework Agreement and the Food Law Code of Practice (FLCoP). A summary of the main findings and key improvements necessary is set out below.

2.2 **Strengths:** The Authority demonstrated consistent high performance with regard to meeting planned inspection targets of food businesses due an intervention.

2.3 **Key area for improvement:**

Food premises interventions: Interventions/inspections needed to be recorded in sufficient and consistent detail to demonstrate establishments have been fully assessed to the legally prescribed standards.

Internal Monitoring: Discussions indicated that whilst some qualitative monitoring checks were being carried out it was recognised there is a need to further develop these across the full range of food related activities undertaken. In addition complete records of internal monitoring activities should be maintained.

3.0 Audit Findings

3.1 Organisation and Management

Strategic Framework, Policy and Service Planning

- 3.1.1 At the City of London Corporation, official food controls were delivered by two Commercial Teams and the Port Health Service acting as the London Port Health Authority (LPHA). All were part of the Port Health & Public Protection Service (PH&PP) which was part of the Department of Markets & Consumer Protection (M&CP). The audit focused primarily on the work of the former Food Safety Team.
- 3.1.2 The Authority had developed a documented Food Service Plan for 2015-2016 which had been given Elected Member approval. The Plan was linked to corporate objectives in the Business Plan for the Port Health and Public Protection Team 2015-2018. The aims and objectives for the team were to:
- *protect public health from risks which may arise in connection with the consumption of food, including risks caused by the way in which it is produced or supplied and otherwise;*
 - *protect the interests of consumers in relation to food so that all food sold is as described and is labelled correctly*
- 3.1.3 The Plan highlighted key achievements and projected work streams. Performance against targets was demonstrated in the overall Business Plan. The service plan was supplemented by comprehensive performance reviews at least three times a year which included challenges to the service, overriding issues and updates of performance indicators.
- 3.1.4 The Plan was generally well structured and broadly followed the Service Planning Guidance in the Framework Agreement. It clearly set out the financial resource available for the service and the staffing resources, expressed in terms of hours, required to meet all the statutory demands on the service.
- 3.1.5 The Service Plan for 2015-2016 indicated that there were 7.7 full time equivalent staff dedicated to the delivery of official food controls. Analysis of Local Authority Enforcement Monitoring System (LAEMS) data showed that there had been an approximate 6.5% reduction in staff engaged in food hygiene between 2013-2014 and 2014-2015 due to restructure of the service.
- 3.1.6 At the time of the audit some roles and responsibilities were still being refined following the main service review. As part of a previous review in 2013-14, the Food Safety Team had also acquired additional interventions

formerly dealt with by The Port Health Service, which resulted in the transfer of some 125 additional premises (primarily river-based tourists vessels), to the planned inspection programme.

Documented Policies and Procedures

- 3.1.7 The Authority had developed a range of documented procedures and work instructions for its food law enforcement service; these were reviewed by the Lead Food Officer.
- 3.1.8 The inclusion of document version numbers provided an element of document control, but there was no comprehensive review process to ensure that policies and procedures are up to date and accurately reflect changes in legislation and guidance. The review provisions should indicate who is responsible for carrying out the review and at what frequency.

Recommendation(s)

3.1.9 The Authority should:

Set up, maintain and implement a control system for all documentation relating to its enforcement activities. [The Standard – 4.2]

Officer Authorisations

- 3.1.10 The Authority had developed a documented procedure for the authorisation of officers. The procedure had been proactively reviewed against the latest version of the Food Law Code of Practice (FLCoP), issued on the 7th April 2015 although some areas needed further detail.
- 3.1.11 Authorisation and training records for four officers engaged in delivering official controls were checked including the Lead Food Officer. Officers were all authorised generically and whilst authorisation documents did reference the majority of legislation, key references were absent including; Official Food and Feed Control Regulations 2009, Food Safety and Hygiene (England) Regulations 2013 and the Trade in Animal Related Products Regulations 2011. Auditors advised that the LA should authorise specifically under these Regulations as they contain direct enforcement powers. Furthermore specific authorisation could then be tailored as appropriate in the event that an officer did not meet the competencies required to undertake all official controls or enforcement sanctions.

- 3.1.12 Auditors were advised that officer competence was assessed and monitored through the Authority's formal performance and development appraisal system and mapping against the Regulators Development Needs Assessment Tool (RDNA). Summary evidence was provided for one officer that showed completion of the process and training needs identified as a result.
- 3.1.13 Qualification and training records for four officers were examined and these demonstrated that officers were receiving the minimum 10 hours relevant training per annum based on the principles of continuing professional development. Some evidence was provided of formal enforcement and specialist technical training.

Recommendation(s)

3.1.14 The Authority should:

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]

3.2 Food Premises Database

- 3.2.1 The Authority was operating a database capable of providing accurate monitoring returns to the agency. During the onsite phase of the audit and at short notice the LA was asked to provide auditors with a range of reports. These were found to be consistent with LAEMS data previously supplied.
- 3.2.2 The Authority had the benefit of dedicated systems support. The Operational Support Team Manager and his team had exclusive access rights to update premises records in terms of opening and closure of business premises. Individual officer access was password controlled.
- 3.2.3 Auditors were informed that to ensure that the database was reflective of the premises in the district it was regularly updated based upon information received during the Licensing, Planning and Building Regulation process. Evidence showed that the Food Safety Team were a consultee as part of the application process for licensing and appropriate planning applications. The LA also relied on the local knowledge of

officers to identify new food premises coupled with the consultation process above.

- 3.2.4 Prior to the on-site phase auditors had been advised by the Food Hygiene Ratings Team that there were some potential anomalies and inaccuracies in data that the authority had uploaded to the Food Hygiene Rating Scheme (FHRS), Portal. A report on the areas for attention had been provided to the Authority for further investigation. It was noted that some of these anomalies arose through character limitations in certain fields (Trader Name) of the LA's database and largely caused by the size of some City buildings across multiple street addresses.
- 3.2.5 Evidence from the audit did confirm that the database appeared to be consistent with LAEMS data supplied and moreover showed continued high performance with regard to meeting inspection targets.

3.3 Food Premises Interventions

- 3.3.1 The LA had a reviewed intervention and inspection procedure that broadly followed the guidance within the FLCoP. File checks demonstrated that inspections were generally carried out at appropriate intervals.
- 3.3.2 Auditors examined five general premises files and the records relating to the most recent and preceding inspections. The premises files were selected across a range of risk category A – D premises and included interventions carried out by a range of authorised officers.
- 3.3.3 The LA had adopted a comprehensive aide memoire which officers were required to complete after each inspection. In all files examined, however, there was insufficient level of detail recorded about the size, scale and nature of the business and the type of food operations carried out.
- 3.3.4 In four out of the five files there was not enough information recorded to justify how compliance was assessed overall or how the risk scores were allocated based upon compliance as well as non-compliance. Auditors discussed the need to maintain accurate and detailed inspection records. These would provide officers with an enforcement history and would enable them to undertake a consistent and appropriate graduated enforcement approach. They would also inform and support the risk rating given to a food premises.
- 3.3.5 Following a scheduled food hygiene inspection written findings were always provided to the Food Business Operator (FBO). This correspondence contained detailed advice for food businesses, clearly

differentiating between contraventions and recommendations of good practice with appropriate timescales for compliance.

- 3.3.6 There was evidence of appropriate revisits being carried out in most cases to check business compliance. However auditors discussed the need to generally record more detail in relation to revisit finding outcomes as the LA was not able to provide in all cases evidence of when an officer had secured compliance with regard to significant areas of concern.

Recommendation(s)

3.3.7 The Authority should:

Ensure that inspections/interventions are recorded in sufficient detail to demonstrate establishments have been fully assessed to the legally prescribed standards, the Food Law Code of Practice and centrally issued guidance. [The Standard - 7.2 and 7.3]

Verification visit to a Food Premises

- 3.3.8 During the audit, a verification visit was undertaken to a restaurant / take away 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.
- 3.3.9 During the visit the officer was able to demonstrate familiarity with the premises and a good and effective working relationship with the FBO. The officer had effectively identified the structural issues and key operations at the businesses and the advice given at the last inspection had resulted in valuable improvements being made.

3.4 Enforcement

- 3.4.1 The Authority had developed a documented Food Safety Enforcement and Prosecution Policy which was dated September 2014. The policy had been developed in accordance with centrally issued guidance and had been endorsed by elected members. Good use of flow charts was noted in enforcement procedures that gave officers clear unambiguous instruction in an easy to follow format.
- 3.4.2 File record checks were carried out in regard to food hygiene improvement notices, hygiene emergency prohibition notices, voluntary

closure and certification of food under regulation 29. The LA had not undertaken any prosecutions in the 2 years prior to the audit.

- 3.4.3 All enforcement actions were found to be appropriate to the circumstances found and in general followed due legal process. Good evidence was found of the use of photographs to support enforcement action taken. However auditors were unable to find sufficient information in all cases to show outcomes of formal enforcement monitoring visits. Also in relation to the destruction of food after the service of regulation 29 notices there were no records to indicate whether food was disfigured to prevent it re-entering the food chain prior to disposal by the FBO.

3.5 Internal Monitoring

- 3.5.1 The Authority needed to develop and implement a documented internal monitoring procedure that covered all areas of the service in particular the enforcement decisions and follow up actions relating to poor performing businesses, the allocation of risk scores and associated food hygiene ratings. This documentation process should also include details of corrective actions taken as a result of monitoring.
- 3.5.2 Evidence was obtained for documented monitoring only when officers served hygiene improvement notices. This took the form of a notice check sheet that ensured that formal enforcement notices were peer reviewed for inaccuracies and adherence with the Enforcement Policy. Auditors agreed that this was an example of effective monitoring.
- 3.5.3 Quantitative monitoring was carried out in relation to response times and inspection targets. This was facilitated through the use of the LA database system reporting process. The type of database system used did allow officers and the Lead Food Officer to easily analyse when and if an inspection had been completed, what interventions were overdue or had outstanding actions associated with them.
- 3.5.4 Auditors were informed that accompanied inspections with officers and desktop reviews of performance were carried out, however records were not maintained. Auditors were also advised by the Lead Food Officer that qualitative monitoring was carried out during one to ones and staff appraisals. Whilst individual officer interventions may have been discussed during these meetings there was no evidence available to determine what was discussed and more importantly occasions when the Lead Food Officer had implemented a corrective action or identified a training or development need.

Recommendation(s)

3.5.5 The Authority should:

- (i) Further develop and implement its documented internal monitoring procedures in accordance with Article 8 of Regulation (EC) No. 882/2004, the Food Law Code of Practice and centrally issued guidance to include reviews of inspection records and risk scoring and follow up enforcement actions. [The Standard-19.1]
- (ii) Verify its conformance with the standard, relevant legislation the relevant Codes of Practice, centrally issued guidance and the Authority's own documented policies and procedures. [The Standard-19.2]
- (iii) Keep a record of all internal monitoring in particular record deviations and corrective actions. Records should be kept for at least 2 years. [The Standard-19.3]

Food and Food Premises Complaints

- 3.5.6 The LA had developed a documented food complaints policy and procedure. This included a helpful flow chart that gave advice to the investigating officer on steps to be observed such as advising the FSA of a possible incident.
- 3.5.7 Audit checks on five file records of food and food premises complaint investigations found that generally appropriate investigations and follow up actions had been carried out.
- 3.5.8 Officers had responded expediently to the type of complaint and carried out initial visits in good time where appropriate.

Food Inspection and Sampling

- 3.5.9 The Authority had developed a policy statement that set out the intended sampling plan for 2014/15. The authority participated in FSA and PHE sampling programmes and also frequently used sampling as a tool to inform and support enforcement and/or interventions. Sampling was further directed by participation in the London Food Coordinating Group.

- 3.5.10 Evidence was provided to demonstrate that the FBO was informed of sampling results as appropriate.
- 3.5.11 Auditors did discuss with the LA improvements to the level of detail recorded when carrying out interventions following sampling. Whilst basic details of visit dates were recorded auditors could not find information in all instances as to why sampling had been carried out, what checks had been made on non-compliances that may have caused the unsatisfactory sample result or the advice that had been given to the FBO in such circumstances.

Records

- 3.5.13 Records were maintained in electronic and hard copy format. Records were retrievable and found to be mostly well organised.

Third Party or Peer Review

- 3.5.15 The Authority had not participated in an inter authority audit or peer review process in the two years prior to the audit.
- 3.5.16 A report to the Port Health & Environmental Services Committee in July 2015 included benchmarking evidence on a variety of Environmental Health functions, including Food Safety. This was collected from neighbouring London Local Authorities and was used to inform the subsequent Service-Based Review

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Food Standards Agency
Operations Assurance Division

ANNEX A - Action Plan for City of London Corporation

Audit date: 30 November– 2 December 2015

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.9 Set up, maintain and implement a control system for all documentation relating to its enforcement activities. [The Standard – 4.2]	30/09/2016	<ul style="list-style-type: none"> ▪ Further consider the existing systems for document control including the storage and referencing of procedures and other documentation; following structural changes in service delivery that are due to commence fully on 1st April 2016, this will need to be considered across the 'Commercial board'. 	<ul style="list-style-type: none"> ▪ Individual Food procedures had already been reviewed in preparation for the structural changes and to reflect the current Food Law Code
3.1.14 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]	30/04/2016	<ul style="list-style-type: none"> ▪ Review the current procedure in light of the Auditors comments, enhance and sign off the requisite procedure for authorising Authorised Officers. ▪ Ensure that line managers with responsibility for Authorised Officers meet the necessary competency requirements of the code (in their capacity as lead officers) following structural changes in service delivery that are due to commence fully on 1st April 2016. ▪ Ensure that the Authority's existing Performance and Development Framework (that already utilises the RDNA) includes the necessary assessment and development of competences required in the Food Law Code and that this is signed off appropriately. This will be completed within the Authority's 2016-17 appraisal cycle and in time for the Code revision on competency (effective April 2016). ▪ Add the key enforcement references (3.1.11 of the audit report) in Officers' authorisations. 	<ul style="list-style-type: none"> ▪ The existing procedure for authorising Authorised Officers had been reviewed prior to the audit to reflect changes in the Food Law Code; this procedure is now being further developed to reflect the information in the Practice Guidance (published sometime after the code), any comments made by the Auditors in relation to the competency framework and the more general work nationally. ▪ Discussions have also taken place in SE London local authorities in an effort to introduce a more standardised system for competency assessment and endorsement. ▪ The existing Lead Officer Food has attended the FSA Lead Officer course on Competency and Authorisation requirements.

<p>3.3.7 Ensure that inspections/interventions are recorded in sufficient detail to demonstrate establishments have been fully assessed to the legally prescribed standards, the Food Law Code of Practice and centrally issued guidance. [The Standard - 7.2 and 7.3]</p>	<p>ALL DONE (except Mobile Working which is scheduled for 2017/2018)</p>	<ul style="list-style-type: none"> ▪ The existing Inspection Record Form enables the full assessment of an inspection intervention to be appropriately recorded (evidenced). ▪ An initial briefing will be held with officers to report on the Audit findings generally. ▪ One-to-one meetings will reinforce recording requirements following interventions ▪ Further work will be built into a planned longer term mobile working solution for the Service to enhance inspection reporting and the efficient and effective gathering of data / intelligence whilst limiting duplication. 	<ul style="list-style-type: none"> ▪ An officer briefing on the Audit findings was completed on 18th January. This included reference to 'Making every inspection count' and the appropriate completion of pages 2 & 3 of our existing Inspection Record Form. ▪ Officers currently on contract (to year end 2015/2016) have been apprised of the findings separately on an individual basis. ▪ The Enforcement Notice Checklist has been enhanced to confirm and record proof of service.
<p>3.5.5 (i) Further develop and implement its documented internal monitoring procedures in accordance with Article 8 of Regulation (EC) No. 882/2004, the Food Law Code of Practice and centrally issued guidance to include reviews of inspection records and risk scoring and follow up enforcement actions. [The Standard-19.1]</p>	<p>30/04/2016</p>	<ul style="list-style-type: none"> ▪ The Authority's existing Performance and Development Appraisal process includes a system for formal one-to-one meetings to review Objectives and Learning & Development targets set at annual appraisals and which already include service standards. ▪ We will further review our process for monitoring inspections and follow up enforcement action including how this data is recorded. ▪ Weekly Team Briefing Sessions (established as part of the new Commercial structure) will be used to discuss the completion of intervention records. ▪ Develop the use of Northgate M3 to enable certain key enforcement decisions, discussions on inspections and risk scoring and concomitant monitoring activities to be logged more fully. 	<ul style="list-style-type: none"> ▪ The internal monitoring processes have been reviewed, principally to include record keeping procedures for recording planned and reactive qualitative management; this includes documenting monitoring done following one-to-one meetings ▪ We have also introduced a more general system for recording 'key decisions' relating to the management of inspection and enforcement activity and much of this can be logged as an action / activity on our Northgate M3 database.
<p>3.5.5 (ii) Verify its conformance with the standard, relevant legislation the relevant Codes of Practice, centrally issued guidance and the Authority's own documented policies and procedures. [The Standard-19.2]</p>	<p>ON-GOING</p>	<ul style="list-style-type: none"> ▪ See 3.5.5 (i): The arrangements for internal monitoring will be enhanced and better recorded. This will be necessary following changes in the management structure within the Service. 	<p>See above</p>

3.5.5 (iii) Keep a record of all internal monitoring in particular record deviations and corrective actions. Records should be kept for at least 2 years. [The Standard-19.3]	ON-GOING		See above
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ANNEX B - 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 relevant LA policies, procedures and linked documents were examined before and during the audit:

Food Service Plan
Officer authorisation, training and qualification records
Enforcement Policy
A range of food hygiene law enforcement procedures
Minutes of meetings and reports to members

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

General food premises inspection records
Training records
Food and food premises complaint records
Food sample records
Formal enforcement records.

(3) Review of Database records:

To review and assess the completeness of database records of food hygiene inspections, food and food premises complaint investigations, samples taken by the authority, formal enforcement and other activities and to verify consistency with file records

To assess the completeness and accuracy of the food premises database

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

Team Manager/ Lead Food Officer
Senior Environmental Health Officers
Environmental Health Officers

Opinions and views raised during officer interviews remain confidential and are not referred to directly within the report.

(5) On-site verification check:

A verification visit was made with an Officer from the Authority 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 FLCoP and official guidance.

ANNEX C - Glossary

Authorised officer	A suitably qualified officer who is authorised by the local authority to act on its behalf in, for example, the enforcement of legislation.
Broadly Compliant	An outcome measure which the Food Standard Agency has developed with local authorities to monitor the effectiveness of the regulatory service relating to food law. It is based on the risk rating scheme in the Food Law Code of Practice which is currently used by food law enforcement officers to assess premises which pose the greatest risk to consumers failing to comply with food law.
Codes of Practice	Government Codes of Practice issued under Section 40 of the Food Safety Act 1990 as guidance to local authorities on the enforcement of food legislation.
County Council	A local authority whose geographical area corresponds to the county and whose responsibilities include food standards and feeding stuffs enforcement.
District Council	A local authority of a smaller geographical area and situated within a County Council whose responsibilities include food hygiene enforcement.
E. coli O157	E.coli O157 belongs to the group of verotoxigenic E. coli (VTEC) bacteria which are a toxin-producing strain of Escherichia coli that occur naturally in the gastrointestinal tract of animals such as cattle and sheep, and are pathogenic to humans. E.coli O157 is the VTEC strain that has been most commonly implicated in human infection in the UK.
External Temporary Storage Facility (ETSF)	A warehouse (formerly known as an enhanced remote transit shed or ERTS) designated by HM Revenue and Customs (HMRC), where goods are temporarily stored pending clearance by HMRC, and prior to release into free circulation.

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 Hygiene Rating Scheme (FHRS)	The Food Hygiene Rating Scheme provides information to the public about hygiene standards in catering and retail food establishments. It is run by local authorities in partnership with the Food Standards Agency. Businesses that fall within the scope of the scheme are given a 'hygiene rating' which shows how closely the business was meeting the requirements of food hygiene law at the time of inspection. The scheme also encourages businesses to improve hygiene standards.
Food Safety Management System	A written permanent procedure, or procedures, based on HACCP principles. It is structured so that this requirement can be applied flexibly and proportionately according to the size and nature of the food business.
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: Food and Feed Law Enforcement Standard Service Planning Guidance Monitoring Scheme Audit Scheme</p> <p>The Standard and the Service Planning Guidance set out the Agency's expectations on the planning and delivery of food and feed law enforcement.</p> <p>The Monitoring Scheme requires local authorities to submit yearly returns via LAEMS to the Agency on their food enforcement activities i.e. numbers of inspections, samples and prosecutions.</p>

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

Full Time Equivalents (FTE)	A figure which represents that part of an individual officer's time available to a particular role or set of duties. It reflects the fact that individuals may work part-time, or may have other responsibilities within the organisation not related to food and feed enforcement.
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.
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.
Safer food, better business (SFBB)	A food safety management system, developed by the Food Standards Agency to help small catering and retail businesses put in place food safety management procedures and comply with food hygiene regulations.
Service Plan	A document produced by a local authority setting out their plans on providing and delivering a food service to the local community.

Trading Standards	The Department within a local authority which carries out, amongst other responsibilities, the enforcement of food standards and feeding stuffs legislation.
Trading Standards Officer (TSO)	Officer employed by the local authority who, amongst other responsibilities, may enforce food standards and feeding stuffs legislation.
Unitary Authority	A local authority in which the County and District Council functions are combined, examples being Metropolitan District/Borough Councils, and London Boroughs. A Unitary Authority's responsibilities will include food hygiene, food standards and feeding stuffs enforcement.