

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

Craven District Council
4-5 December 2012



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 Environmental Health and Trading Standards Services.

The attached audit report examines the 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's offices in all the devolved countries comprising the UK.

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 all UK local authorities and can be found at: www.food.gov.uk/enforcement/auditandmonitoring.

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

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1.0 Introduction

- 1.1 This report records the results of an audit at Craven District Council with regard to food hygiene enforcement, under relevant headings of the Food Standards Agency Food Law Enforcement Standard. The audit focused on the Authority's arrangements for the management of the food premises database, food premises interventions, and internal monitoring. The report has been made available on the Agency's website at:

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

Hard copies are available from the Food Standards Agency's Local Authority Audit and Liaison Division at Aviation House, 125 Kingsway, London WC2B 6NH, Tel: 020 7276 8428.

Reason for the Audit

- 1.2 The power to set standards, monitor and audit local authority food law enforcement services was conferred on the Food Standards Agency by the Food Standards Act 1999 and the Official Feed and Food Controls (England) Regulations 2009. This audit of Craven District Council 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 selected for inclusion in the Food Standards Agency's programme of audits of local authority food law enforcement services because it had not been audited by the Agency in the past five years, and was representative of a geographical mix of 12 local authorities selected across England.

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 Craven District Council'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 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 offices at 1 Belle Vue Square, Broughton Road, Skipton on 4-5 December 2012.

Background

- 1.7 Craven District Council is located in North Yorkshire and comprises a mix of rural and urban areas. The largest town in Craven is Skipton and other major population centres in the region include High Bentham, Settle and Grassington. A large part of the District's area lies within the Yorkshire Dales National Park. The tourist season in the area is almost all year round with a drop off in visitors between January and March. There is a relatively small total resident population of approximately 54,000 spread over 73 parishes in a large total area of about 118,000 hectares.
- 1.8 With more than 5 million visitors to the Authority's area every year, the tourist economy has the largest number of businesses with a significant proportion being catering establishments including numerous pubs, restaurants and hotels. Craven is also known for its historical markets, where traditional and speciality foods are sold by local producers. With regard to local employment, the banking, finance and insurance sector has experienced significant growth in the area. Agriculture and land-based industries also form a significant part of the District's economy, particularly within the more remote areas.
- 1.9 Food hygiene law enforcement was the responsibility of the Environmental Health Team, which was also responsible for the enforcement of health and safety legislation, infectious disease

control, animal welfare, caravan site licensing and the control of private water supplies.

- 1.10 The Environmental Health Team was not responsible for food standards and feeding stuffs law enforcement, which was carried out by the Trading Standards Service at North Yorkshire County Council.
- 1.11 The Authority reported the profile of Craven District Council's food businesses as of 31 March 2012 as follows:

Type of Food Premises	Number
Primary Producers	2
Manufacturers/Packers	43
Importers/Exporters	1
Distributors/Transporters	30
Retailers	155
Restaurant/Caterers	709
Total Number of Food Premises	940

2.0 Executive Summary

- 2.1 The Authority had not developed a Food Service Plan for 2012/13. A Food Service Plan for 2011/12 had been approved by the Authority and was generally in line with the Service Planning Guidance in the Framework Agreement. However, it did not include a comparison of the staff resources required to deliver the food law enforcement service against the staff resources available to the Authority. The absence of such information and a current Service Plan makes it difficult to substantiate and quantify any resource shortfalls to senior management and Members.
- 2.2 Auditors were advised that a recent management review resulted in changes to the management structure of environmental health including the food law enforcement service. It was therefore essential that the Authority fully clarified the roles and responsibilities of all managers and officers involved in food service delivery. This, together with a realistic assessment of the resources required to deliver all areas of the food service, would enable the Authority to both plan and deliver a well managed, sustainable and effective risk-based food law enforcement service within the new departmental structure. The impact on service delivery of the reorganised structure should form part of the review process in the next year's service planning arrangements.
- 2.3 Following the implementation of a new organisational structure, the delegated powers for officer authorisation required review to ensure that they could not be subject to legal challenge. In practice, an authorisation matrix and a supporting assessment of criteria for authorisation of officers were in place. This process effectively ensured that officers' qualifications, experience and competence were assessed and it was clear that the lead officer for food and the other officers involved in food enforcement work were appropriately authorised. However, auditors were advised that currently all Environmental Health Officers (EHO) employed by the Authority had been issued with generic authorisations and officers not involved in food law enforcement were inappropriately authorised to enforce food related legislation.
- 2.4 The Authority was operating a database capable of providing monitoring returns to the Agency. However, auditors discussed a number of significant anomalies in relation to the accuracy of last year's Local Authority Enforcement Monitoring System (LAEMS) returns. These related mainly to inaccuracies in the reporting of the number of food businesses and food complaints. Auditors also discussed other minor database anomalies that appeared to be caused by the configuration of the database software system.
- 2.5 In the absence of a Food Service Plan for 2012/13, the priorities for the inspection programme for the current year had not been documented, although it was evident that the Service was targeting the highest risk

premises and was prioritising inspections on a risk basis. There were however, a significant number of overdue interventions of both higher and lower risk food businesses and a large number of premises that either required an initial inspection or had been erroneously reclassified as unrated following the launch of the Food Hygiene Rating Scheme. It was also clear from the LAEMS returns made by the Authority that a number of interventions across all risk categories had reduced significantly in 2011 compared to previous years, despite a slight increase in the overall number of food businesses in the District. The implementation of effective internal monitoring would ensure that the intervention programme is carried out with unrated premises being inspected and risk rated and revisits carried out where necessary.

- 2.6 Audit record checks for both general food premises and approved establishments confirmed that in the main, detailed effective inspections were being carried out. However, there were some inconsistencies noted in the level of detail recorded by officers on their inspection findings. Although there was some variation in approach, it was evident that following more recent inspections, officers were, in general, adopting a graduated and proportionate approach to enforcement where the food business operator (FBO) failed to satisfactorily address contraventions. More extensive internal monitoring would assist in promoting greater consistency between officers.
- 2.7 Records of food and food premises complaint investigations examined generally confirmed that complaints were effectively and appropriately investigated. However, there was evidence of variations of approach between officers, including in the methods of maintaining records.
- 2.8 The Service had not developed a sampling programme for 2012/13. Where samples had been taken by officers on an ad hoc basis or on the suggestion of the Health Protection Agency (HPA) record checks confirmed that effective and appropriate follow-up actions had been taken in cases of unsatisfactory sample results.
- 2.9 An Enforcement Policy had been developed, implemented and approved by the appropriate Member forum and procedures on specific formal enforcement options provided useful guidance to officers. Audit checks on file records for a range of formal enforcement activities confirmed the actions taken to be proportionate and appropriate although some drafting and procedural improvements were discussed.
- 2.10 It was evident that regular quantitative monitoring was undertaken in relation to key performance targets and reported to senior management and Members. However, the Service had recognised that consistent qualitative internal monitoring across all areas of food law enforcement activities needed to be implemented to assist in ensuring a consistent approach by all officers.

3.0 Audit Findings

3.1 Organisations and Management

Strategic Framework, Policy and Service Planning

- 3.1.1 The aim of the Authority's food service, as stated in the 2011/12 Environmental Health Food Service Plan 'is to ensure that food produced, transported, stored, marketed or consumed in Craven is safe to eat.' The work of the Service aimed:
- To achieve high levels of compliance with food law.
 - To assist businesses understand and meet their legal obligations.
 - To celebrate businesses that set high standards through the Good Hygiene Award.
 - To target resources at those businesses most in need.
 - To seek and respond to customer feedback.
 - To minimise the risk of food poisoning and control outbreaks should they occur.
- 3.1.2 In September 2011, the Council's Policy Committee considered a report from the Deputy Chief Executive in relation to the proposed introduction of the Food Hygiene Rating Scheme (FHRS) in Craven District Council. The Committee resolved that FHRS be introduced in the Authority's area from 1 April 2012.
- 3.1.3 The Food Service Plan 2011/12, approved in November 2011 by the Corporate Leadership Team, was generally in line with the Service Planning Guidance in the Framework Agreement. However, it did not include a comparison of the staff resources required to deliver the food law enforcement service against the staff resources available to the Authority. At that time the food law enforcement service was the responsibility of the Food and Workplace Safety and Private Sector Housing Team under the Strategic Neighbourhoods manager. A Food Service Plan for 2012/13 had not been developed and there was no documented review available of the 2011/12 Plan. The absence of comprehensive and current service planning information made it difficult for the Service to assess whether the staffing levels were adequate and therefore to substantiate any potential resource shortfalls.
- 3.1.4 In 2011 the Environmental Health Service had been subject to a major re-structuring exercise resulting in the reduction of both management levels and operational staff available to undertake food law enforcement. Under the new flatter management structure one of the Senior Environmental Health Officers in the existing Food and Workplace Safety Team had recently been given the role of lead food

officer reporting directly to the interim Environmental Health Manager who in turn reported to the Deputy Chief Executive. At the time of the audit the working arrangements under the new structure were still being embedded and in the absence of a current Food Service Plan, the day to day specialist and managerial responsibilities for the food law enforcement service were unclear. It was therefore essential that the Authority fully clarified the roles and responsibilities of all managers and officers involved in food service delivery.

Recommendations

3.1.5 The Authority should:

- (i) Draw up, document and implement a service delivery plan in accordance with the Service Planning Guidance in the Framework Agreement and ensure that this includes a clear comparison of the resources required to carry out the full range of statutory food law enforcement activities against the resources available to the Service. [The Standard – 3.1]
- (ii) Carry out a documented performance review at least once a year based on the Food Service Plan, which is submitted to either the relevant Member forum or senior officer where responsibility for approval is delegated to them. Any variance in meeting the Plan should be addressed in the following year's Plan. [The Standard - 3.2 and 3.3]
- (iii) Ensure that the Service has a sufficient number of suitably qualified, experienced and competent officers to carry out the work set out in the Food Service Plan. [The Standard – 5.3]

Documented Policies and Procedures

3.1.6 The Service had adopted a formal quality management system as part of the North Yorkshire Food Liaison Group. The accredited procedures established the basis for participating authorities' own operational procedures.

3.1.7 The Authority had also developed comprehensive local documented procedures across most areas of food law enforcement. These however, had not been reviewed in recent years and contained out of date legislative and operational references and instructions. The

auditors were advised that the Service was intending to carry out a comprehensive review of all procedures with the aim of developing a local customised procedure. The aim was to provide effective up to date guidance to officers, while still conforming to the accredited North Yorkshire standard.

Recommendation

3.1.8 The Authority should:

Ensure that all documented food service policies, procedures and working practices are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance. [The Standard – 4.1]

Officer Authorisations

- 3.1.9 The Authority had developed a documented Authorisation of Food Safety Enforcement Officers and Support Staff procedure which required further development and updating as it did not reflect the current organisational structure. Following the recent restructuring of the Service, the delegated powers for the authorisation of officers required review by the Authority's legal department to ensure that they could not be subject to legal challenge. In practice, an authorisation matrix and a supporting assessment of criteria for authorisation of officers were in place. This process effectively ensured that officers' qualifications, experience and competence were assessed and it was clear that the lead officer for food and the other officers involved in food enforcement work were appropriately authorised. However, auditors were advised that currently all Environmental Health Officers had been issued with generic authorisations and officers not involved in food law enforcement were therefore inappropriately authorised to enforce food related legislation.
- 3.1.10 Checks made on individual officer authorisation documents confirmed that these contained out of date and incorrect legislative references. These documents required review to ensure that officers were appropriately authorised under all relevant legislation including those relating to imported food controls. The Service also needed to review which officers were nominated for authorisation under the Food and Environment Protection Act 1985 and inform the Agency accordingly, as the information currently held centrally was out-dated.

- 3.1.11 The Authority had in place a system of annual Performance Development reviews and the auditors were advised that training needs were discussed as part of the review of officers' performance. Team training requirements were also discussed at food team meetings.
- 3.1.12 Officer qualification and training records were maintained by the Authority and from audit checks it was evident that adequate training was available to officers who were receiving a minimum of 10 hours of relevant training per annum in accordance with the specified levels of Continuing Professional Development (CPD) training requirements in the Food Law Code of Practice.

Recommendations

3.1.13 The Authority should:

- (i) Expand and fully implement the Service's documented procedure on the authorisation of officers to detail the competency assessment process by which authorisations are conferred, based on an officer's individual qualifications, training and experience. [The Standard – 5.1]
- (ii) Review and update individual current officer authorisations as necessary to ensure that all officers are appropriately authorised under relevant current legislation in accordance with their individual level of qualification, experience and competency. [The Standard – 5.1 and 5.3]

3.2 Food Premises Database

3.2.1 The Service operated a computer database system that was capable of providing the returns required for the Local Authority Enforcement Monitoring System (LAEMS). The operation of the system was overseen on an ad hoc basis by an administrator who was responsible for entering new premises, updating the records in relation to closed premises and for producing LAEMS monitoring returns.

3.2.2 Audit checks of the LAEMS returns for 2011/12 and discussions during the audit confirmed that there were a number of significant anomalies in relation to the data reported, namely:

- The Service had reported that zero food complaints had been received during 2011/12 and also for the preceding two years. Audit checks confirmed that this was incorrect as approximately 10 food complaints were received by the Authority each year, as confirmed in the Food Service Plan.
- The Service had reported a significant increase in the number of unrated premises, namely a total of 266 compared to 28 reported in the previous year's returns. This corresponded with a significant decrease in the number of businesses across risk rating categories B, C, D and E. Audit discussions confirmed, however, that the majority of businesses reported as unrated, at least 200 premises, were actually those that had not returned a Food Hygiene Rating Scheme business questionnaire following the launch of the scheme in the Authority's area. The risk scores for all these businesses had been removed so that their risk score had been reported as zero despite them having been previously inspected and risk assessed. Database checks confirmed that the majority of these businesses incorrectly marked as unrated were in fact overdue for inspection.
- Audit checks also identified other minor database anomalies that appeared to be caused by the configuration of the database software system.

3.2.3 There was currently no documented procedure in place to ensure that the food premises database was accurate and up to date. However, auditors were advised that weekly checks of local newspapers were carried out with the aim of identifying any new food businesses opening in the district. In addition, officers made visual checks during their visits in the Authority's area to identify any new or closed businesses and also any that may have changed ownership.

- 3.2.4 Checks on premises in the area identified by Internet searches confirmed that the majority were on the database and included within the Authority's intervention programme.

Recommendations

3.2.5 The Authority should:

- (i) Ensure that the electronic food premises database is configured, managed and operated in such a way to provide accurate and complete monitoring returns to the Agency. [The Standard – 6.3]
- (ii) Set up maintain and implement a documented procedure to ensure that its food 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]

3.3 Food Premises Interventions

3.3.1 As the Authority had not developed a Food Service Plan for the current year, the priorities for the inspection programme for 2012/13 were not documented. However, the Service's LAEMS returns for 2011/12 confirmed the following food premises profile for the Authority as of 31 March 2012.

Premises Risk Category	Number of Premises
A	1
B	15
C	270
D	115
E	218
Unrated	266
Outside programme	55
TOTAL	940

3.3.2 It was evident from audit checks that the Service was targeting the highest risk premises and was prioritising inspections on a risk basis. In the LAEMS returns for both 2010/11 and 2011/12 the Service reported no overdue interventions in relation to both risk category A and B premises. However, from examining the last three years of LAEMS returns made by the Authority it appeared that the total number of interventions achieved across all risk categories had reduced significantly in 2011/12 compared to previous years, despite a slight increase in the overall number of food businesses.

Risk Rating	Interventions Achieved		
	2009/10	2010/11	2011/12
Risk Category A	17	8	2
Risk Category B	107	85	37
Risk Category C	490	401	287
Risk Category D	67	119	37
Risk Category E	81	113	57
Unrated	13	8	44
Outside programme	0	0	0
Total interventions achieved	775	734	464
Total number of food businesses	911	920	940

3.3.3 An up to date report produced during the audit confirmed that there were three category B premises overdue an inspection by up to five months. There were also a significant number of overdue interventions of risk category C, D and E premises. From the LAEMS returns for the preceding three years and from a report produced by the Service during the audit it was evident that the number of overdue

interventions of both higher and lower risk food businesses had significantly increased since 2009/10.

- 3.3.4 Auditors were advised that when a new food business registration form was received, the premises were entered on the database and a target inspection date 28 days after registration was allocated. However, the auditors were further advised that inspections of unrated businesses would be prioritised according to the perceived nature, size and scale of the business operation. An analysis of the premises database, which was provided to the auditors prior to the audit, confirmed that 283 premises were unrated. However, the auditors were advised that of these approximately 200 businesses had been reclassified by the Service as unrated after not returning questionnaires sent out as part of the launch of the Food Hygiene Rating Scheme (FHRS) in 2012. The questionnaires were aimed at ensuring that business operations had not significantly changed since the premises were last inspected, in order to ensure that the food hygiene rating given to the business and therefore made public following the launch of the scheme was accurate. Auditors were advised that all businesses only received an initial rating under the FHRS if a completed questionnaire was returned or following the next inspection. However, where questionnaires were not returned, the Service erroneously changed the businesses' risk ratings to unrated on the database, even when inspections had previously been carried out and a risk rating allocated.
- 3.3.5 Auditors were advised that questionnaires to risk category E businesses due for inspection used to be sent out every month as part of the Service's alternative enforcement strategy. Since the launch of FHRS officers reviewed all their allocated risk category premises on their quarterly inspection lists, and identified those premises that required an inspection rather than a questionnaire, with the aim of giving them an initial rating under FHRS.

Recommendation

3.3.6 The Authority should:

Ensure that food hygiene interventions at food premises in their area are carried out at a frequency which is not less than that determined under the intervention rating scheme set out in the Food Law Code of Practice with priority given to the inspection of higher risk establishments in the Authority's area. [The Standard – 7.1]

- 3.3.7 The Authority had developed local documented procedures on general and approved establishment inspections and had also adopted procedures and aides-memoire that were part of the North Yorkshire accredited management system. The auditors were advised that in practice officers used a range of documents from both systems. It was acknowledged by the Authority that the current documentation required review and consolidation to ensure that there was clear, consistent guidance and documentation for use by officers.
- 3.3.8 In response to the publication of the Agency's guidance on E.coli O157 and Control of Cross-Contamination, the Authority had developed two additional aides-memoire for butchers and high risk catering establishments designed to ensure that officers addressed the specific requirements of the guidance during inspections.
- 3.3.9 Audit file record checks were undertaken in relation to five general food premises and overall it was evident that detailed, effective inspections had been carried out. However, there were some inconsistencies noted in the level of detail recorded by officers on their inspection findings, particularly in relation to compliance with the cross contamination guidance. There was not always sufficient information contained in the inspection records to evidence whether follow-up action taken was appropriate and effective. However, the recent implementation of the additional aides-memoire together with the proposed review of inspection procedures should assist with the comprehensive recording of inspection details.
- 3.3.10 Auditors were advised that until recently appointments were being made for some programmed inspections. Although there was some variation in approach, officers were, in general, adopting a graduated and proportionate approach to enforcement where the FBO had failed to satisfactorily address contraventions and auditors advised that more follow up action was being taken since all inspections had become unannounced. However, revisits were not always being carried out where timescales had been given for the FBO to carry out works and where the inspection records indicated a follow-up visit to be appropriate.
- 3.3.11 Inspection report forms were consistently provided to the FBO following each intervention, which confirmed the key points found on inspection but did not consistently confirm what follow-up action would be taken by the Authority.
- 3.3.12 The Authority had approved six establishments under Regulation (EC) No. 853/2004 and had carried out a review following the requirement in January 2012 to re-assess for approval all establishments that have changed FBO since 1 January 2006.

3.3.13 Auditors checked records for three approved establishment files. The premises had been approved in accordance with legislative requirements and official guidance. In general, the inspections carried out were thorough, and recorded on appropriate product specific aides-memoire. However, the inspection records did not always contain sufficient detail of inspection findings and the assessment undertaken, especially in relation to the assessment of HACCP. It was also unclear from the records available for one meat products premises, whether this establishment should also have been approved for meat preparations. The approved establishment files did not contain all the information as listed in Annexe 10 of the Food Law Practice Guidance and the Service acknowledged that approved establishment files would benefit from being more structured to assist with record retrieval.

Recommendations

3.3.14 The Authority should:

- (i) Take appropriate and timely action including revisits on any non-compliance found in accordance with the Authority's enforcement policy and documented procedures. [The Standard –7.3]
- (ii) Maintain up to date, accurate and comprehensive records for all establishments, including those approved under Regulation (EC) No. 853/2004. The records should detail the determination of compliance with legal requirements and comprehensive reports of all inspections, visits and where relevant the basis for approval, in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard –16.1]

Verification Visit to a Food Premises

3.3.15 During the audit, a verification visit was undertaken to a local butchers with an experienced officer of the Authority, who had carried out the last food hygiene inspection of the premises. The main objective of the visit was to assess the effectiveness of the Authority's assessment of food business compliance with food law requirements. The specific assessments included the conduct of the preliminary interview of the FBO by the officer, the general hygiene checks to verify compliance with the structure and hygiene practice requirements and checks carried out by the officer to verify compliance with HACCP based procedures.

3.3.16 During the visit, the officer was able to demonstrate familiarity with the premises, and the operations carried out. The officer had completed a thorough inspection, appropriately 'red flagged' issues of ongoing significance and in general had effectively assessed the business' compliance with legal requirements.

3.4 Enforcement

- 3.4.1 The Authority had developed an Environmental Enforcement Policy in 2008 which covered the activities of the Environmental Health Service and had been approved by the appropriate Member forum. In addition, an Inspection and Enforcement Policy Statement had been produced which was made available to businesses. A further Food Safety Enforcement Policy was developed in 2009 as part of the Quality Management System. The auditors were advised that the Service intended to amalgamate the two policies with the food specific document being an annexe to the main policy.
- 3.4.2 The Service had also developed procedures on specific food law enforcement options and these provided useful guidance to officers although some updating was required to fully accord with official guidance. The auditors were advised that these procedures would be reviewed as part of the wider review and consolidation of procedures and policies.
- 3.4.3 Records of three hygiene improvement notices (HIN) were examined and these were signed by correctly authorised officers who had witnessed the contravention. Service of the notices was found from the premises records and inspection history to be the appropriate course of action. Confirmation that the notices had been properly served was available for two of the notices examined. In the case of two notices where the Authority had granted a time extension for compliance the correct process had not been followed, in that no written application from the FBO had been received and the original notice in both cases had not been withdrawn and re-issued with a revised compliance date. There was no clear evidence of any internal monitoring being undertaken in relation to HINs.
- 3.4.4 Records for a voluntary closure procedure were examined. The agreement had been confirmed in writing by the FBO and the officer and it was evident that routine checks were made to confirm the premises remained closed. There was no evidence of any internal monitoring of the closure procedures.
- 3.4.5 Available records for two prosecutions were examined. From the premises records, it was evident that these actions were found to be appropriate however, there was no documented evidence that the requirements of the Enforcement Policy had been properly considered as part of prosecution proceedings.

Recommendations

3.4.6 The Authority should:

- (i) Carry out food law enforcement activities in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard –15.3]
- (ii) Records in relation to prosecutions should clearly demonstrate that decisions have been made following consideration of the requirements of the Authority's enforcement policy. [The Standard –15.4]

3.5 Internal Monitoring, Third Party or Peer Review

Internal Monitoring

- 3.5.1 The Authority had developed a documented Food Safety Activity Monitoring procedure which described the criteria for the qualitative monitoring of inspections, food complaints and food sampling. There were also some references to internal monitoring in the Service's operational documented procedures. The auditors were advised that the procedure was due to be reviewed.
- 3.5.2 Although some internal monitoring in the form of accompanied inspections was being carried out, the Service had recognised that the existing internal monitoring procedures required review. Also structured internal monitoring across all areas of food law enforcement activities needed to be implemented and maintained to ensure that the intervention programme is carried out, unrated premises are inspected and risk rated and revisits are carried out where necessary. Effective internal monitoring would also assist in ensuring there is a consistency in approach by all officers.
- 3.5.3 There was evidence that regular quantitative monitoring was undertaken in relation to key performance targets and that this was reported to senior management and Members.

Recommendations

3.5.4 The Authority should:

- (i) Routinely verify its conformance with the Standard, relevant legislation, the Food Law Code of Practice, centrally issued guidance and the Authority's own documented policies and procedure across all the Authority's food law enforcement activities. [The Standard – 19.2]
- (ii) Ensure that records of monitoring activities are maintained. [The Standard – 19.3]

Food and Food Premises Complaints

- 3.5.5 The Food Service Plan 2011/12 confirmed that it was the Council's policy to respond to all complaints within three days, and a Food Complaint Fact Sheet was given to each complainant, explaining the

follow-up actions the Service could take, depending on the outcome of the investigation. The Authority had also developed a documented procedure on the investigation of food and food premises complaints and service requests and acknowledged that this would benefit from being reviewed and updated as part of the general document review.

- 3.5.6 Checks made on records for five food and food premises complaints confirmed that complaints were generally effectively and appropriately investigated. However, there was evidence of variations of approach between officers, including in the methods of maintaining records. It was also not always clear whether the results of any investigation were confirmed to the complainant.

Recommendation

3.5.7 The Authority should:

Investigate complaints received in accordance with the Food Law Code of Practice, centrally issued guidance and the Authority's own policies and procedures.
[The Standard – 8.1]

Food Inspection and Sampling

- 3.5.8 The Service had developed a documented food sampling procedure and had drawn up a sampling policy which formed part of the 2010/11 sampling programme. A sampling programme for 2012/13 had not been developed, although some samples had been taken on the suggestion of the Health Protection Agency and other samples had been taken by officers on an ad hoc basis during inspections.
- 3.5.9 Checks were made on records for five recent samples. These confirmed that effective and appropriate follow-up actions had been taken in cases of unsatisfactory sample results.

Recommendations

3.5.10 The Authority should:

- (i) Set up, maintain and implement a documented sampling programme that shall accord with any centrally issued or relevant guidance and the Food Law Code of Practice and shall include reference to its approach to any relevant national or regional sampling programmes. [The Standard – 12.4]
- (ii) Carry out sampling in accordance with its documented sampling policy, procedures and programme. [The Standard – 2.6]

Records

- 3.5.11 In general, records across the range of food law enforcement activities were easily retrievable and comprehensive, although the Service acknowledged the benefit of expanding the level of detailed recorded by officers following inspection and in relation to approved establishments.

Recommendation

3.5.12 The Authority should:

Ensure that adequate, up to date and accurate records in retrievable form are maintained on interventions at general and approved establishments in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 16.1]

Third Party or Peer Review

- 3.5.13 The Authority was subject to regular inter authority audits by officers within the North Yorkshire Food Liaison Group as part of the North Yorkshire quality management system audit scheme, aimed at the 'provision of a standardised food regulation service throughout North Yorkshire'.
- 3.5.14 After the completion of the onsite audits audit summaries were produced by the auditors which included details of each identified non conformance. The Service responded in writing to the auditors using

corrective action templates and detailing what remedial actions had been taken in relation to each issue.

Auditors: Christina Walder
Alun Barnes
Robert Hutchinson

Food Standards Agency
Local Authority Audit and Liaison Division

ANNEXE A Action Plan for Craven District Council

Audit date: 4-5 December 2012

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.5(i) Draw up document and implement a service delivery plan in accordance with the Service Planning Guidance in the Framework Agreement and ensure that this includes a clear comparison of the resources required to carry out the full range of statutory food law enforcement activities against the resources available to the Service. [The Standard – 3.1]	30/04/13	Food Service Plan 2013/14 has been drawn up by Lead Food Officer and Environmental Health Manager. To be approved by 09/04/13.	Food Service Plan 2013/14 drawn up, documented and to be implemented 1 April 2013. Includes a clear comparison of resources required to deliver food service against the resources available. Requires approval by Corporate Leadership Team (CLT). To be submitted to CLT on 09/04/13.
3.1.5(ii) Carry out a documented performance review at least once a year based on the Food Service Plan, which is submitted to either the relevant Member forum or senior officer where responsibility for approval is delegated to them. Any variance in meeting the Plan should be addressed in the following year's Plan. [The Standard - 3.2 and 3.3]	30/11/13	Six monthly review of performance against the Service Plan to be carried out, documented and submitted to Director of Services.	Discussed with the Environmental Health Manager and agreed. Once the Food Service Plan has been approved by CLT, the first review will be undertaken on 30/11/13.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.1.5(iii) Ensure that the Service has a sufficient number of suitably qualified, experienced and competent officers to carry out the work set out in the Food Service Plan. [The Standard – 5.3]</p>	<p>31/08/13</p>	<p>Train/develop additional EHO from within Environmental Health to undertake low risk food inspections (D's & E's) to help clear the backlog and assist with initial inspections of new businesses (1 1/2 days per week) Increase 0.4 Senior EHO to FTE food safety. Train/develop Environment Technician to investigate infectious diseases such as Campylobacter, Salmonella and Cryptosporidium.</p>	<p>The current establishment is 3.0 FTE. The staffing required to fulfil the required duties is estimated to be 3.2 FTE.</p> <p>Additional resources from within Environmental Health to be used. Training on going and documented.</p>
<p>3.1.8 Ensure that all documented food service policies; procedures and working practices are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance. [The Standard – 4.1]</p>	<p>30/04/13</p>	<p>All documented food service policies, procedures and working practices (local procedures) to be updated. Following which these documents will be reviewed on a six monthly basis or whenever there are changes to legislation/guidance. The first review will be undertaken on 31/10/13. Individual local procedures will be worked through at each food team meeting to refresh knowledge and ensure consistency between officers.</p>	

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.13(i) Expand and fully implement the Service's documented procedure on the authorisation of officers to detail the competency assessment process by which authorisations are conferred, based on an officer's individual qualifications, training and experience. [The Standard – 5.1]	30/04/13	Expand and implement documented procedure on the authorisation of officers. Following the recent restructure the delegated powers for the authorisation of officers requires review by the Authority's legal department to ensure that they are not subject to legal challenge.	Referred to Environmental Health Manager who is addressing the issue in consultation with Legal Manager.
3.1.13(ii) Review and update individual current officer authorisations as necessary to ensure that all officers are appropriately authorised under relevant current legislation in accordance with their individual level of qualification, experience and competency. [The Standard – 5.1 and 5.3]	30/04/13	Review and update all individual officer authorisations to include: Legislation updated on authorisations. Include Imported Food controls for officers authorised to enforce food related legislation. Nominate officers for authorisation under the Food and Environment Protection Act 1985 and inform FSA. All generic authorisations for officers not involved in food law enforcement to be removed.	Referred to Environmental Health Manager who is addressing the issue in consultation with Legal Manager.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.2.5(i) Ensure that the electronic food premises database is configured managed and operated in such a way to provide accurate and complete monitoring returns to the Agency. [The Standard – 6.3]	30/04/13	A documented procedure to be developed and implemented to improve database accuracy. Improved liaison with Business rates – monthly spreadsheet to be sent showing new and closed businesses. The LAEMS report is to be checked by Environmental Health Manager before submission.	Negotiating to assign some costs to internal IT department. Some accuracy issues have been identified as part of the audit and action has been taken to address these.
3.2.5(ii) Set up maintain and implement a documented procedure to ensure that its food 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]	30/04/13	A documented procedure to be developed and implemented to improve database accuracy. Improved liaison with Business rates – monthly spreadsheet to be sent showing new and closed businesses. FSA documents 'Making Every Inspection Count' and 'Accurate Reporting Through LAEMS' to be used as guidance.	An officer has responsibility for ensuring the database is kept up to date. Administrators Authorisations restricted. Officers informed of need to ensure correct inputting of food complaints and inspections via Food team meeting.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.3.6 Ensure that food hygiene interventions at food premises in their area are carried out at a frequency which is not less than that determined under the intervention rating scheme set out in the Food Law Code of Practice with priority given to the inspection of higher risk establishments in the Authority's area. [The Standard – 7.1]</p>	<p>31/08/13</p>	<p>Additional resources from within Environmental Health to be spent on food hygiene interventions. Increase 0.4 Senior EHO to FTE food safety. Monthly quantitative monitoring of the inspection programme to be undertaken.</p>	<p>Food Service Plan to be submitted to CLT on 09/04/13. <u>EHO training</u> Training ongoing of additional EHO from within Environmental Health to undertake low risk food hygiene interventions (D's & E's) to help clear the backlog and assist with initial inspections of new businesses (1½ days per week). EHO's informed that inspection of high risk establishments is a priority via Food team meeting. Determined that until all establishments have received a Food Hygiene Rating Score that alternative flexibilities for broadly compliant C rated premises, D and E risk rated premises in line with Food Law Code of Practice (England) April 2012 would not be possible. Alternative enforcement strategy in form of questionnaires used for E rated establishments outside the scope of the FHRS – low risk questionnaires sent out to these establishments on a quarterly basis.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.3.14(i) Take appropriate and timely action including revisits on any non-compliance found in accordance with the Authority's enforcement policy and documented procedures. [The Standard –7.3]</p>	<p>30/04/13</p>	<p>Enforcement policy and documented procedures to be updated and circulated to Officers.</p> <p>Officers to be reminded of requirement to undertake revisits within five working days of due date and that a record of inspection form must be left at establishment at next food team meeting – all details documented.</p> <p>Individual local procedures will be worked through at each food team meeting to refresh knowledge and ensure consistency between officers.</p>	

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.3.14(ii) Maintain up to date, accurate and comprehensive records for all establishments, including those approved under Regulation (EC) No. 853/2004. The records should detail the determination of compliance with legal requirements and comprehensive reports of all inspections, visits and where relevant the basis for approval, in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard –16.1]</p>	<p>Completed</p>	<p>The approved meat product establishment will be checked to determine whether it needs to be approved for meat preparations.</p> <p>Approved establishment files would benefit from being more structured to assist with record retrieval and all files will be set up to contain all the information as listed in annexe 10 of the food law practice guidance.</p> <p>The quality of records for interventions in general and approved establishments will form part of routine monitoring activities.</p>	<p>Officers instructed to provide comprehensive and accurate records of interventions in all establishments and complete the appropriate form for the premises – food meeting following Audit.</p> <p>The inspection form for general establishments has been updated to include E.coli O157 bolt on in line with recent guidance and includes more detailed information gathering in relation to private water supplies.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.4.6(i) Carry out food law enforcement activities in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard –15.3]	30/04/13	<p>Update and amalgamate the Food Safety Enforcement Policy with the Environmental Enforcement Policy with the food specific document being an annexe to the main policy.</p> <p>All documented food service policies, procedures and working practices (local procedures) to be updated.</p> <p>Internal monitoring to be extended to include: - Hygiene Improvement Notices (HINs), Voluntary Closure, Emergency Prohibition Notices, Food premises, food complaints and unsatisfactory food samples.</p>	Officers reminded of the correct procedure for granting a time extension for HINs including re-issue of HIN with amended date via food team meeting and email. Letter of compliance with notice required to FBO.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.4.6(ii) Records in relation to prosecutions should clearly demonstrate that decisions have been made following consideration of the requirements of the Authority's enforcement policy. [The Standard –15.4]	30/04/13	Once the documented local procedure has been updated and reviewed officers will be reminded of the correct procedure to follow.	A decision to prosecute record sheet is in use and forms part of the local procedure for Prosecutions. The prosecution record sheet covers the factors in relation to the Enforcement Policy and this is completed prior to the file being passed to the legal department. At the time of the audit one of the prosecution files was ongoing and had not been passed to legal therefore the form would not be completed until a signature was required from the Environmental Health Manager.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.5.4(i) Routinely verify its conformance with the Standard, relevant legislation, the Food Law Code of Practice, centrally issued guidance and the Authority's own documented policies and procedure across all the Authority's food law enforcement activities. [The Standard – 19.2]	30/04/13	<p>Review and update monitoring procedure.</p> <p>Structured internal monitoring across all areas of food law enforcement activities to be implemented, maintained and documented to ensure that the intervention programme is carried out, unrated premises are inspected and risk rates and revisits are carried out where necessary.</p> <p>The FSA document 'Making Every Inspection Count' to be used as guidance.</p>	<p>Monthly food team meeting held.</p> <p>Part of North Yorkshire Food Liaison Group Quality Management System – all framework documents comply with Food Law Code of Practice and are updated regularly.</p>
3.5.4(ii) Ensure that records of monitoring activities are maintained. [The Standard – 19.3]	30/04/13	Records to be maintained for all food law enforcement activities, including any corrective actions.	Accompanied inspection and file monitoring reviews documented.
3.5.7 Investigate complaints received in accordance with the Food Law Code of Practice, centrally issued guidance and the Authority's own policies and procedures. [The Standard – 8.1]	30/04/13	Once the documented local procedures have been updated and reviewed officers will be reminded of the correct procedure to follow at the next food team meeting. To include maintaining records and result of the investigation confirmed to the complainant.	

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.5.10(i) Set up, maintain and implement a documented sampling programme that shall accord with any centrally issued or relevant guidance and the Food Law Code of Practice and shall include reference to its approach to any relevant national or regional sampling programmes. [The Standard – 12.4]	30/04/13	After 1 April 2013 the Food Sampling Programme for 2013/14 will be followed.	Food Sampling Programme for 2013/14 being developed. Not fully completed due to awaiting protocols for cross regional and national surveys from Health Protection Agency. Sampling Programme to include imported foods.
3.5.10(ii) Carry out sampling in accordance with its documented sampling policy, procedures and programme. [The Standard – 2.6]	30/04/13	After 1 April 2013 the Food Sampling Programme for 2013/14 will be followed.	Environment Technician carrying out food sampling two days per week. Taking part in the swabbing project as intervention in compliant premises until 31/03/13.
3.5.12 Ensure that adequate, up to date and accurate records in retrievable form are maintained on interventions at general and approved establishments in accordance with the Food Law Code of Practice and centrally issued guidance. [The Standard – 16.1]	Completed	<p>Approved establishment files would benefit from being more structured to assist with record retrieval and all files will be set up to contain all the information as listed in annexe 10 of the food law practice guidance.</p> <p>The quality of records for interventions in general and approved establishments will form part of routine monitoring activities.</p>	Officers instructed on the requirement for more detailed record keeping in relation to inspections and issues in respect of approved establishment records at the feedback following audit meeting held on 11/12/12.

ANNEXE 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 2011/12
- The Authorisation of Food Safety Enforcement Officers and Support Staff Procedure and associated documentation
- Food Premises Interventions document and Procedure for Food Premises Inspection
- Products of Animal Origin Approval Procedure
- Food inspection documentation including aides-memoire and inspection report forms
- Procedure for Dealing with Food Complaints and associated documentation
- Food Sampling Procedures
- Food Safety Enforcement Policy, Environmental Enforcement Policy and Inspection and Enforcement Policy Statement
- The Service's Formal Enforcement procedures
- Food Safety Activity Monitoring procedure and associated templates
- Minutes of recent North Yorkshire Food Liaison Group meetings and Environmental Health Team Meetings.

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

- General food premises inspection records
- Approved establishment records
- Food complaint records
- Records of food sampling
- Internal monitoring 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
- To assess the capability of the system to generate food law enforcement activity reports and the monitoring information required by the Food Standards Agency.

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

- Interim Environmental Health Manager
- Two Senior Environmental Health Officers

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

(5) On site verification check:

A verification visit was made with the Authority's officers to a local food business. The purpose of the visit was to verify the outcome of the last inspection carried out by the Local Authority and to assess the extent to which enforcement activities and decisions met the requirements of relevant legislation, the Food Law Code of Practice and official guidance, having particular regard to LA checks on FBO compliance with HACCP based food management systems.

ANNEXE 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.
Enhanced Remote Transit Shed	A warehouse 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

The Framework Agreement consists of:

- Food and Feed Law Enforcement Standard
- Service Planning Guidance
- Monitoring Scheme
- Audit Scheme

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

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

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

Full Time 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 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.