

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

Doncaster Metropolitan Borough Council
6-7 November 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 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 and feed 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 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 the 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 Doncaster Metropolitan Borough 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 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 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 Doncaster Metropolitan Borough 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 including in the Food Standards Agency's programme of audits of local authority food law enforcement services as it had not been audited in the past five years by the Agency 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 Doncaster Metropolitan Borough Council's arrangements for the management of the food premises database, 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 establishment 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 The Council House, Floor 3, College Road, Doncaster on 6-7 November 2012.

Background

- 1.7 Doncaster is a Metropolitan Borough of South Yorkshire which includes the towns of Mexborough, Conisbrough, Thorne and Finningley. The Borough has a population of 302,400.
- 1.8 The area has a history of mining, horseracing and heavy engineering for the railways. There has been considerable investment in regeneration of Doncaster in recent years. Transport and connectivity continue to play an important role with the opening of the international Robin Hood Airport and the proposed development of the Doncaster International Railport with a link road connecting to the M18.
- 1.9 Food hygiene law enforcement was the responsibility of the Food Team, which was part of the Food and Animal Health Team in the Environmental Protection Service of the Regeneration and Environment Directorate of the Council.
- 1.10 The Food Team was also responsible for delivering enforcement of health and safety and food standards legislation in food premises.

1.11 The Authority reported the profile of Doncaster Metropolitan Borough Council's food businesses at 31 March 2012 as follows:

Type of Food Premises	Number
Primary Producers	168
Manufacturers/Packers	64
Importers/Exporters	0
Distributors/Transporters	42
Retailers	812
Restaurant/Caterers	2,371
Total Number of Food Premises	3,457

2.0 Executive Summary

- 2.1 Auditors acknowledged that there had been a recent restructure of the Service. A further restructure was being undertaken and officers were also preparing for an imminent office move to a new location.
- 2.2 The Authority had developed a draft Service Plan which was broadly in line with the Service Planning Guidance contained in the Framework Agreement. The Service Plan would benefit from highlighting staff and financial resources actually available compared with those required to provide the Food Service. The review section would benefit from being updated.
- 2.3 A document control procedure had recently been developed and authorised. A number of the documented policies and procedures had been developed within the South Yorkshire Food Liaison Group. The Authority acknowledged that not all procedures accurately reflected activities carried out in practice, and that they should be reviewed and implemented to provide consistency and guidance for staff.
- 2.4 A detailed procedure had been developed for training and competency of food officers and this was supplemented, when appropriate, with the use of a food induction exercise for officers new to food enforcement. Auditors identified this as good practice. The Authority would benefit from expanding the procedure to outline the authorisation process.
- 2.5 In all cases examined, officers were appropriately qualified and competent for their level of authorisation and had undertaken a minimum of 10 hours continuing professional development (CPD) in accordance with the Food Law Code of Practice (FLCoP). However, auditors noted that additional up to date training, particularly in hazard analysis and critical control point (HACCP) evaluation and inspection of establishments for approval would be of benefit to officers and the team as a whole.
- 2.6 A premises database procedure had been developed and recently reviewed. A number of checks carried out prior to and during the audit confirmed that the database was operated in such a way as to enable accurate monitoring returns to be made to the Agency on the Local Authority Enforcement Monitoring System (LAEMS). Recent data cleansing had taken place and generally the database was accurate and up to date.
- 2.7 While there was no evidence that officers were not routinely carrying out their duties in accordance with legal requirements, it was not possible to confirm or assess that appropriate inspections and interventions were being carried out in all cases due to lack of sufficiently detailed records maintained by the officers in their notebooks and/or on the database.

- 2.8 Officers appeared to be recording findings by 'exception' in their reports rather than database records being updated with sufficient detail to confirm if the whole of the business activities (including details of HACCP evaluation, compliance with the Agency's E.coli O157 Control of Cross-Contamination guidance, general hygiene requirements etc.) had been assessed. It was not always clear what follow up actions were undertaken by the officers.
- 2.9 The Authority would benefit from producing appropriate aides-memoire to assist officers in their recordings of findings during inspections and to ensure a full business compliance history was recorded.
- 2.10 The issues of record keeping were reflected during the reality visit carried out with one of the officers at a butcher's establishment. However, the auditor noted that the officer had a good understanding and familiarity with the activities being carried out at the business, and had established a good professional working relationship with the FBO.
- 2.11 Generally, the frequency of high risk premises inspections was in accordance with those required by the FLCoP, however, auditors noted that risk rating scores did not always reflect the findings recorded in both general and approved establishments.
- 2.12 The approach to tackling the backlog of unrated and overdue inspections was discussed. It was clear that resources were being focused on the inspection of higher risk premises, and most of the overdue premises were lower risk. Unrated, potentially high risk, food premises were allocated to officers by the lead officer, however auditors advised this procedure should be formalised and undertaken more frequently to address the outstanding unrated premises.
- 2.13 The Authority acknowledged that the enforcement policy would benefit from a review. Associated documented procedures for formal follow up actions had been developed but auditors also discussed the benefit of including references where appropriate to ensure consistent implementation of the recent Agency's E.coli O157 Control of Cross-Contamination guidance and revising the prosecution documentation.
- 2.14 File checks confirmed that a wide range of formal enforcement actions had been carried out by the Authority. These were appropriate and effective in ensuring improved business compliance but the process for serving hygiene improvement notices (HINs) should adhere more closely with the Food Law Practice Guidance.
- 2.15 Comprehensive procedures for the investigation of food complaints had been developed. All records examined of complaints about food and food premises confirmed that an appropriate investigation had been carried out, appropriate actions had been taken on findings, and complainants were informed of the results of the investigations.

- 2.16 The Authority was implementing a proactive approach to food sampling and had been in receipt of grants to enable funding of sampling from a food manufacturer who was supplying the Olympics, and for imported foods. A dedicated officer implemented and coordinated the sampling programme. Where unsatisfactory sample results had been obtained, appropriate follow-up actions with the food business operator had been taken.
- 2.17 A comprehensive internal monitoring procedure had been developed but should be reviewed to better reflect the monitoring being undertaken in practice. This should be risk based and proportionate covering all areas of food law enforcement activities. The concerns relating to record keeping should be identified by effective monitoring.
- 2.18 The Service had a system of measuring and reporting quantitative figures of activities undertaken to senior management.
- 2.19 It was noted that no peer review had been undertaken in the last two years and none was planned for the forthcoming year. However, the Authority was actively involved in the South Yorkshire Food Liaison Group. The Food and Animal Health Manager was a facilitator on the Local Government Association's Knowledge Hub. The Authority had also developed website social network pages to provide information and advice for stakeholders.

3.0 Audit Findings

3.1 Organisations and Management

Strategic Framework, Policy and Service Planning

- 3.1.1 A restructure of the Service had recently taken place and at the time of the audit, a further review and restructure was being undertaken.
- 3.1.2 The Authority had developed a draft Doncaster Food Plan 2012/13 which was broadly in line with the Service Planning Guidance contained in the Framework Agreement. The Plan was supplemented by a document of 'Additional Information'.
- 3.1.3 The Plan linked directly to key issues for the Borough including Mayoral aims, in particular issues concerning health, education, skills and supporting economic growth.
- 3.1.4 Auditors were advised that a number of food service activities were corporately monitored monthly and quarterly, however, the Food Plan would benefit from an updated annual review to highlight improvements made within the Service and address variances in meeting targets. This should include consideration of the impact of the implementation of the Food Hygiene Rating Scheme (FHRS), and database cleansing and management.
- 3.1.5 The cost of delivering the Food Service was not contained in the Plan but was provided to auditors at the time of the visit. As well as including a breakdown of financial resources, the Plan would benefit from being further developed to clarify the number of full time equivalent (FTE) staff in post against those needed for providing all aspects of the service.
- 3.1.6 Due to the recent constitutional changes the drafted Plan had not been formally approved and it was not clear whether this would be by the Portfolio Holder or senior officers.
- 3.1.7 The Authority was delivering the Food Hygiene Rating Scheme (FHRS), which had been introduced in April 2012 and had received a grant from the Agency to assist with their data cleansing in preparation for the implementation of the scheme.

Recommendations

3.1.8 The Authority should:

- (i) Ensure that future Food Service Plans are in full accordance with the Service Planning Guidance in the Framework Agreement to include a review of the delivery of the Plan and an accurate estimate of the financial and staffing resources required to deliver the food law enforcement service. [The Standard – 3.1 and 3.2]
- (ii) Submit the Plan for approval to the relevant member forum or relevant senior officers. [The Standard – 3.2]
- (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

3.1.9 The Authority had recently developed a document control procedure which had been authorised by the Head of Service and applied to all staff involved in producing and issuing procedures and staff using the controlled documents.

3.1.10 Documents were held in a 'read only' folder on the computer, and master copies were held with restricted system access so amendments could only be made by the Document Controller and authorised personnel. Documents were readily available to authorised officers who could access them when working remotely if necessary.

3.1.11 A number of the documented policies and procedures had been developed within the South Yorkshire Food Liaison Group. The Authority acknowledged that not all procedures, for example the inspection and enforcement procedures, accurately reflected activities carried out in practice. Where necessary, these procedures should be reviewed and implemented to provide guidance for staff and ensure consistency in service delivery.

Recommendation

3.1.12 The Authority should:

Review and revise the documented food law enforcement procedures having regard to the Food Law Code of Practice and centrally issued guidance, to ensure they reflect operational procedures carried out in practice in relation to all interventions and enforcement activities carried out.

[The Standard – 7.4 and 15.2]

Officer Authorisations

- 3.1.13 Auditors were advised that the Head of Service had delegated powers to authorise officers. There was no formal procedure for authorisation of officers, although in practice this was carried out through a recommendation by the Food and Animal Health Manager to the Head of Service based on officers' qualifications, training and competency.
- 3.1.14 A detailed procedure had been developed for training and competency of food officers and an authorisation matrix contained the formal list of delegated powers. However, this procedure did not reflect the training and assessment of competency of officers carried out in practice.
- 3.1.15 Schedules of authorisations were generally detailed and up to date although auditors advised that appropriate officers also required specific authorisation for Regulation 27 of the Food Hygiene (England) Regulations 2006 and the Authority was advised to review other minor anomalies. Warrant cards contained out of date legislative references. Auditors suggested seeking advice on the legislative references required on the warrant card from the Authority's legal department.
- 3.1.16 Qualifications, training and experience matched the authorisation and powers exercised in practice, and in all records examined, authorised officers' qualifications and training certificates had been maintained by the Authority as required by the FLCoP.
- 3.1.17 Individual training needs were determined through an annual performance development review supplemented by six monthly reviews. 'Training needs development' forms were completed by officers and collated by the Authority to identify gaps in training.

- 3.1.18 All officers had completed at least 10 hours of continuing professional development (CPD) training per year in accordance with FLCoP requirements.
- 3.1.19 Auditors advised that officers would benefit in particular from training in the inspection of establishments for approval under Regulation (EC) No. 853/2004, in addition to HACCP principles, and auditing of HACCP based food safety management systems, as these areas of training had not been maintained. This was reflected in inspection records examined.
- 3.1.20 The process for assessing competency of officers was ad hoc although auditors were advised of the Authority's use of the LBRO 'Guidance for Regulators Information Point' tool introducing common regulatory competence standards for the professionals undertaking local regulation.

Recommendations

3.1.21 The Authority should:

- (i) Develop, maintain and implement a documented procedure for the authorisation of officers based on their competence. [The Standard – 5.1]
- (ii) Officers should have adequate and up to date training, in particular in HACCP evaluation, and also the necessary specialist knowledge for their specific responsibilities, for example, approved establishments. [The Standard – 5.2]

Good Practice – Assessment of officer competency

The Authority had developed an induction exercise for officers new to food enforcement activities comprising detailed questions and model answers to assist in the assessment of competency.

3.2 Food Premises Database

- 3.2.1 The Authority had developed a procedure for ensuring the accuracy of the premises database, and the service benefitted from assistance by a Business and Administration Support Team including a dedicated officer.
- 3.2.2 The Service operated a computer database system that was capable of providing the returns required for the Local Authority Enforcement Monitoring System (LAEMS).
- 3.2.3 The Authority recognised the importance of database accuracy to carry out their food law enforcement activities, to formulate their interventions strategy, address the unrated premises, provide consistency and transparency for their FHS implementation, and provide accurate monitoring returns to the Agency.
- 3.2.4 The Authority had undertaken a recent proactive review and data cleanse of the premises held on the database. They had received funding for database cleansing prior to their FHS implementation and carried out some intelligence led approaches to updating their records for example 'walking the streets' and making telephone calls to businesses. The database had also been merged with the corporate gazetteer.
- 3.2.5 Various database checks performed prior to, and during the audit confirmed that, with the exception of some minor anomalies, the database was up to date and accurate.
- 3.2.6 The following reports requested by the auditors were provided during the visit:
- Food premises by type and risk category.
 - Food premises which were broadly compliant.
 - Food premises in risk category A.
 - Food premises where interventions were overdue.
 - Food premises with no risk assessment rating.
 - Food premises with 'no inspectable risk'.
- 3.2.7 Officers within the team worked remotely and were responsible for entering records of enforcement activity, including inspection details, actions undertaken and risk ratings on to the system. Systems were in place for back up and security of the electronic database.
- 3.2.8 In spite of the recent data cleansing undertaken, internal monitoring of database entries was ad hoc and auditors discussed the benefits of undertaking more regular formal checks to ensure maintenance of database accuracy.

3.3 Food Premises Interventions

3.3.1 The Authority's draft Food Service Plan 2012/13 identified a total of 3,289 food businesses in the District, and the following breakdown into risk categories at 1 April 2012:

Premises Risk Category	Number of Premises
A	8
B	151
C	949
D	564
E	1,020
Unrated	243
Outside programme	354
*TOTAL	3,289

*Primary producers have not been included in these figures.

- 3.3.2 The approach to tackling the backlog of unrated and overdue inspections was discussed. It was clear that resources were being targeted towards the inspection of higher risk premises, and most of the overdue premises were lower risk. The alternative enforcement strategy flexibility allowed by the FLCoP was discussed.
- 3.3.3 Unrated, potentially high risk, food premises were allocated to officers by the lead officer. Auditors discussed the benefit of this procedure being formalised and undertaken more frequently to address the outstanding unrated premises.
- 3.3.4 It was not possible to confirm or assess that appropriate inspections and interventions were being carried out in all cases due to lack of sufficiently detailed records maintained by the officers in their notebooks and/or on the database.
- 3.3.5 Officers appeared to be recording findings by exception rather than the whole of the business activities so there was an absence of basic information about each business such as:
- Documents examined during the visit.
 - Food activities assessed.
 - Size of the business.
 - Sufficient detail of evaluation of food safety management systems.
 - Implementation of the E.coli O157 Cross-Contamination guidance.

- 3.3.6 There was also little information recorded on the compliance of business with general hygiene requirements such as records of assessment of the adequacy of the structure, facilities or equipment.
- 3.3.7 The absence of information and variations in the content of the records made it difficult to confirm that an effective assessment of compliance of legislative requirements had been made or to determine the basis for the allocation of premises risk ratings. It was therefore also very difficult for an inspecting officer new to a business to establish its full compliance history and to inform an assessment to a graduated approach to enforcement.
- 3.3.8 The Authority would benefit from producing appropriate aides-memoire to assist officers in their recordings of findings during inspections and to ensure a full business compliance history has been recorded. This would assist in informing:
- subsequent inspections
 - justification for the FHS rating
 - a graduated and consistent approach to enforcement
 - effective internal monitoring
- 3.3.9 Records of food hygiene interventions were not in all cases easily retrievable, and officers did not maintain a consistent approach to record keeping and recording their findings appropriately. A 'red flagging' tab was available on the database for alerts but this was not being used to its full potential by all officers.
- 3.3.10 Reports of inspection/letters were sent to the food business operator (FBO) after each inspection and generally contained all the details required by the FLCoP. There was good consistent recording of the current name and address of the FBO, all contraventions were clearly worded, and the measures needed to secure compliance were listed. There was also a clear distinction between legal requirements and recommendations of good practice made in letters to the FBO.
- 3.3.11 Auditors advised that officers should also include an indication of timescales for achieving compliance for the FBO. It was not always clear that revisits were timely, and there appeared to be an inconsistent approach to revisits.
- 3.3.12 The Authority had responsibility for enforcement in ten establishments which required approval under Regulation (EC) No. 853/2004.
- 3.3.13 Three approved establishments' files were examined. In all cases, there was sufficient evidence that the establishments required approval, approval notification documentation was available, and approvals had been granted without delay. However relevant

inspection/intervention forms had not been used for officers to record details of their assessments of business compliance.

- 3.3.14 One of the approved establishments had been inspected in accordance with the frequencies determined by the FLCoP, appeared to have been correctly risk rated and the file was well structured in accordance with Annexe 10 of the Code of Practice Guidance. A useful template detailing the information required to be held on file for approved food establishments had been provided for officers.
- 3.3.15 In the other two files examined, auditors identified insufficient up to date information regarding the scope of the interventions and it was difficult to assess the effectiveness of the interventions carried out. As in the general food establishment's records, the files would benefit from more supportive detailed records. In one of the files, the risk rating scores allocated did not appear to be consistent with the ongoing issues identified.
- 3.3.16 Significant risk was also identified concerning potential cross contamination at one of the establishments and auditors discussed the service of remedial action notice(s) when such risk exists. This may have been more appropriate than the hygiene improvement notices which were served.
- 3.3.17 Auditors noted in one of the files an establishment which had initially been conditionally approved and was then granted a full approval, in spite of deficiencies in the HACCP documentation. Although the approval was historic (2006), this appeared to undermine the subsequent officers' approach to formal enforcement to correct this contravention. This had only recently been rectified by an officer serving hygiene improvement notices for compliance. However, as there was still no evidence of the HACCP plan or documentation on file, auditors were still unable to assess the officers HACCP evaluation. This and the other points noted above may reflect the need for up-to-date training for officers in approved establishments and HACCP.
- 3.3.18 The Authority had developed procedures which had recently been revised for:
- The inspection of food premises.
 - The approval of food establishments.
 - The inspection of imported foodstuffs at Robin Hood Airport.
 - The food hygiene rating scheme.
- 3.3.19 The documented inspection of food premises procedure, and the procedure for the approval of food establishments would benefit from being further developed to include more guidance for officers on:

- HACCP assessment
- E.coli O157 Cross-Contamination guidance and implementation, Pennington recommendations eg 'red flagging' high risk matters of concern and supply to vulnerable groups.
- Completion of standardised aides-memoire in both general and approved food establishments to ensure that all aspects of official controls are considered and recorded in appropriate detail.

3.3.20 There was evidence that the Authority was proactive in providing advice and support to food businesses on complying with current legislation and relevant guidance. Examples included the provision of website social network pages developed to provide information and advice for stakeholders and the distribution of the E.coli O157 Cross-Contamination guidance and DVD to butchers shops.

Verification Visit to a Food Premises

3.3.21 During the audit, a verification visit was undertaken to a butcher's shop 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.

3.3.22 The officer demonstrated good familiarity with the premises and an appropriate understanding of the food safety risks associated with the activities at the premises. However, the issues of exception reporting noted above were reflected in the officer's records of the food hygiene inspection which did not fully detail the extent and scope of the inspection. For example, at the previous inspection, the officer had accepted a verbal undertaking from the FBO not to use the vacuum packing machine for both raw and ready-to-eat foods. This had not been documented in the informal letter sent as a follow up, or on the database. There was no indication of the range of activities being carried out, for example, if pies were being manufactured on site, no evidence of training undertaken by food handlers, no record of suppliers, and the hygiene compliance score applied was not consistent with the FLCoP guidance in Annexe 5 on food establishment hygiene intervention rating scheme.

Recommendations

3.3.23 The Authority should:

- (i) Ensure that food premises interventions and inspections are carried out at a frequency specified by the Food Law Code of Practice, with a priority given to higher risk establishments in the Authority's area. [The Standard -7.1]
- (ii) Establish and implement a procedure for the approach to management of overdue and unrated premises, giving a priority to interventions in higher risk premises in accordance with the Food Law Code of Practice. [The Standard – 7.1 and 7.4]
- (iii) Inspect and approve food establishments in accordance with relevant legislation, the Food Law Code of Practice and Practice Guidance, including the use of appropriate aides-memoire at food premises. [The Standard -7.2]
- (iv) Assess the compliance of food premises to legally prescribed standards to confirm compliance with current legislation, the Food Law Code of Practice and centrally issued guidance. Take appropriate action on any non-compliances found in accordance with the Authority's enforcement policy. [The Standard -7.3]
- (v) Ensure that records of inspection and key details of business operations are stored in such a way that they are retrievable and provide complete records of HACCP evaluations and business compliance histories. [The Standard -7.5]
- (vi) Maintain up to date, accurate and comprehensive records for all establishments including those approved under Regulation (EC) No. 853/2004 in accordance with Annexe 10 of the Food Law Practice Guidance. [The Standard -16.1]

3.4 Enforcement

- 3.4.1 The 'South Yorkshire Food Safety Law Enforcement Protocol' was developed by the South Yorkshire Food Liaison Group, however, the Authority acknowledged that this did not align sufficiently to their own service.
- 3.4.2 Some comprehensive enforcement procedures had also been developed, agreed and recently reviewed within the South Yorkshire Food Liaison Group. Auditors discussed the benefit of including references to the Agency's E.coli O157 Cross-Contamination guidance and also primary authority partnerships within the procedures where applicable. A procedure needed to be developed for the serving of remedial action notices.
- 3.4.3 Although template documentation had been developed for completion by officers undertaking formal legal proceedings, this would benefit from being revised to include for example, how the decision to prosecute should be made with reference to the enforcement policy, and also to make clear the process for the authorisation of prosecutions.
- 3.4.4 The Authority reported that there had been no food seizures or detentions, voluntary surrenders or simple cautions in the two years preceding the audit.
- 3.4.5 Records of three hygiene improvement notices (HINs) were examined. These were all found to be the appropriate course of action and were signed by a correctly authorised officer who had witnessed the contravention. In general, the notices were appropriately drafted in accordance with centrally issued guidance, and timely checks on compliance had been made.
- 3.4.6 Auditors noted that officers did not routinely confirm compliance with HINs in writing to the FBO and the method of recording evidence of proper service was not always identified. There was no evidence of internal monitoring of service of HINs.
- 3.4.7 Records of three voluntary closures were examined. In all cases, this had been an appropriate course of action agreed in writing with the FBO and the officer. File checks confirmed that appropriate follow up visits and actions had been taken and there had been no breaches of voluntary closure agreements. Evidence of internal monitoring was noted in the records examined.
- 3.4.8 Records of four prosecution files were examined. Prosecutions were progressed in a timely manner with detailed database records maintained relating to the progress of the prosecutions and reasons for

any delays. In all cases prosecution was the appropriate course of action and there was good evidence of internal monitoring.

Recommendations

3.4.9 The Authority should:

- (i) Review and revise the enforcement policy to reflect the food enforcement service and activities. Maintain and implement the policy in accordance with the Food Law Code of Practice and other official guidance. [The Standard - 15.1]
- (ii) Develop a documented procedure for the serving and enforcement of remedial action notices. Review and revise other enforcement procedures, where applicable in line with the Food Law Code of Practice and centrally issued guidance. Ensure the documented procedures are implemented for all follow-up and enforcement actions in accordance with the Food Law Code of Practice. [The Standard - 15.2]

3.5 Internal Monitoring, Third Party or Peer Review

Internal Monitoring

- 3.5.1 A comprehensive internal monitoring procedure had been developed within South Yorkshire Food Liaison Group and covered all food law enforcement activities. However, the document would benefit from being reviewed to better reflect internal monitoring being carried out in practice.
- 3.5.2 Since the recent restructure of the Service the responsibility for internal monitoring rested with the Food and Animal Health Manager
- 3.5.3 The team was practising an agile, remote system of working and interviews with officers suggested that they appeared to be in close communications with their manager, either by telephone or through face to face meetings when needing to seek advice.
- 3.5.4 File checks across all food law enforcement activities showed limited documentary evidence of qualitative monitoring of the Service's activities. Auditors were informed of the following qualitative monitoring arrangements which were being carried out at the Authority:
- Regular one to one meetings with staff.
 - An annual performance review with six monthly reviews.
 - Six weekly team meetings with comprehensive minutes kept.
 - Officers were occasionally accompanied by the lead officer on inspections when they required a further opinion or advice although this was not always formally recorded.
 - Although officers submitted their report schedules electronically to the lead officer before correspondence was sent to the FBO, there was no documentary evidence of qualitative monitoring checks of records of business compliance being undertaken.
 - Officers occasionally accompanied each other on complex inspections to share knowledge and maintain consistency of inspection approach and risk ratings.
- 3.5.5 Quantitative monitoring aspects of the service monitoring included reporting monthly to the Head of Service and Portfolio Holder on performance such as numbers of inspections carried out, broadly compliant premises, complaints, and enforcement actions taken.
- 3.5.6 Evidence was provided of monitoring individual and team targets against the inspection programme. This was a standing item on the team meeting agenda.

3.5.7 The Authority would benefit from developing a detailed, documented internal monitoring procedure, which was proportionate and risk based to better reflect internal monitoring in practice. Particular regard should be made to monitoring of interventions and inspections to ensure accurate and detailed records are maintained, and all activities are recorded and retrievable on the shared database to ensure consistency, a graduated approach to enforcement and improved business compliance.

Recommendations

3.5.8 The Authority should:

- (i) Review, revise and fully implement the internal monitoring procedure to include risk based and proportionate documented internal monitoring in accordance with Article 8 of Regulation (EC) No. 882/2004, the Food Law Code of Practice and centrally issued guidance. [The Standard - 19.1]
- (ii) Verify the conformance of the Service with the Standard in the Framework Agreement, the Food Law Code of Practice, relevant centrally issued guidance and the Authority's own documented policies and procedures. [The Standard - 19.2]
- (iii) Ensure records of internal monitoring activities are maintained. [The Standard - 19.3]

Food and Food Premises Complaints

3.5.9 Comprehensive documented procedures for the investigation of food complaints had been developed. The procedures would benefit from being revised to include the investigation of complaints relating to food premises and also when the complaint relates to businesses where a primary authority partnership has been established.

3.5.10 Records for a range of complaints investigated by the Authority were examined. Appropriate follow up actions had been taken in all cases, investigations all complied with the timing set out in the Authority's procedures, and results of the complaints had been confirmed with the complainant. Evidence of internal monitoring was noted on records maintained.

Recommendation

3.5.11 The Authority should:

Revise the documented procedures to include complaints about food establishments including any Primary Authority and referral arrangements. [The Standard - 8.1]

Food Inspection and Sampling

- 3.5.12 The Authority had developed a procedure for food sampling and a detailed sampling plan was contained in the Service Plan's 'Additional Information' document. This stated 'the extensive routine sampling programme carried out by the team has provided an invaluable source for monitoring of food prepared and sold from premises within Doncaster. The sampling programme compliments and adds value to the inspections undertaken by the team, and the results will assist in identifying target areas for next year's inspection programme'.
- 3.5.13 An officer in the team was dedicated to overseeing and implementing the sampling programme and had been in receipt of grants for sampling initiatives including a regional bid to the Agency to sample and analyse imported food and also to the Olympic fund to sample food from a supplying manufacturer.
- 3.5.14 The sampling programme confirmed that the Authority had undertaken sampling as part of national LACORS/HPA studies and also regional and local initiatives. The Authority advised that no food was currently imported through Robin Hood Airport.
- 3.5.15 Records of three unsatisfactory sample results were examined. Checks showed that in all cases appropriate follow-up actions had been taken and FBOs had been informed of results. There was evidence of internal monitoring relating to one of the records examined.

Third Party or Peer Review

- 3.5.16 Auditors were advised that the Authority had not recently participated in any inter-authority audit or peer review initiative and none was planned for the forthcoming year. The Authority was however, an active participant in the South Yorkshire Food Liaison Group.

3.5.17 The Food and Animal Health Manager was a facilitator for the Food Hygiene Forum of the Local Government Association's Knowledge Hub.

Auditors: **Jane Tait**
 Christopher Green
 Kate Thompson

Food Standards Agency
Local Authority Audit and Liaison Division

ANNEXE A Action Plan for Doncaster Metropolitan Borough Council

Audit date: 6-7 November 2012

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.8(i) Ensure that future Food Service Plans are in full accordance with the Service Planning Guidance in the Framework Agreement to include a review of the delivery of the Plan and an accurate estimate of the financial and staffing resources required to deliver the food law enforcement service. [The Standard – 3.1 and 3.2]	31/03/13	The Food Plan 2013/2014 will be developed to ensure it reflects the financial and staffing resources required to deliver the service.	Work started to develop draft food plan 2012/13 into a 2013/14 document that can be approved by our appropriate portfolio holder.
3.1.8(ii) Submit the Plan for approval to the relevant member forum or relevant senior officers. [The Standard – 3.2]	31/05/13	Submit to relevant portfolio holder following the local government elections and Mayoral elections in 2013	Work has already started to develop the draft 2012/13 plan into a 2013/14 plan suitable for submission to the portfolio holder.
3.1.8(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]	31/03/13	Undertake budget review and recruit to vacant posts if possible.	Requests have been submitted to senior management to fill vacant posts, the outcome of which is dependent on a number of on-going internal reviews.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.12 Review and revise the documented food law enforcement procedures having regard to the Food Law Code of Practice and centrally issued guidance, to ensure they reflect operational procedures carried out in practice in relation to all interventions and enforcement activities carried out. [The Standard – 7.4 and 15.2]	Completed	A documented procedure has been drawn up for the service and enforcement of RANs. The inspection procedures for 852 and 853 premises have been reviewed to include the inspection proforma sheets which are being completed, scanned and attached to the inspection worksheets for future reference.	A documented procedure has been drawn up for the service and enforcement of RANs. The inspection procedures for 852 and 853 premises have been reviewed to include the inspection proforma sheets which are being completed, scanned and attached to the inspection worksheets for future reference.
3.1.21(i) Develop, maintain and implement a documented procedure for the authorisation of officers based on their competence. [The Standard – 5.1]	31/03/13	Develop a documented procedure which reflects the existing systems for authorisation of officers and monitoring and maintaining their professional competence.	Drafting of procedure based on existing authorisation records.
3.1.21(ii) Officers should have adequate and up to date training, in particular in HACCP evaluation, and also the necessary specialist knowledge for their specific responsibilities, for example, approved establishments. [The Standard – 5.2]	30/09/13	To be confirmed pending FSA training programme for next year.	Continuing to monitor available training opportunities.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.3.23(i) Ensure that food premises interventions and inspections are carried out at a frequency specified by the Food Law Code of Practice, with a priority given to higher risk establishments in the Authority's area. [The Standard -7.1]	30/06/13	To be reviewed 30 June pending recruitment to vacant posts.	A procedure is being developed to allocate premises which should ensure that premises are allocated when due and that unrated premises are included in the process.
3.3.23(ii) Establish and implement a procedure for the approach to management of overdue and unrated premises, giving a priority to interventions in higher risk premises in accordance with the Food Law Code of Practice. [The Standard – 7.1 and 7.4]	31/03/13	Establish procedure by the end of February and implement by the end of March.	A procedure is being developed to allocate premises which should ensure that premises are allocated when due and that unrated premises are included in the process.
3.3.23(iii) Inspect and approve food establishments in accordance with relevant legislation, the Food Law Code of Practice and Practice Guidance, including the use of appropriate aides-memoire at food premises. [The Standard -7.2]	Completed	All approved establishments files have now been brought up to date and all inspections of 852 and 853 premises are being recorded on LGA exemplar inspection proformas. An Internal monitoring procedure has now been adopted to ensure that inspection and approval procedures are being complied with.	All approved establishments files have now been brought up to date and all inspections of 852 and 853 premises are being recorded on LGA exemplar inspection proformas. An Internal monitoring procedure has now been adopted to ensure that inspection and approval procedures are being complied with.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.3.23(iv) Assess the compliance of food premises to legally prescribed standards to confirm compliance with current legislation, the Food Law Code of Practice and centrally issued guidance. Take appropriate action on any non-compliances found in accordance with the Authority's enforcement policy. [The Standard -7.3]</p>	<p>31/03/13</p>	<p>The premises files relating to the 853/2004 premises audited have been reviewed and any missing information is now included. Evidence of appropriate enforcement actions on the approved establishments is now available. An Internal monitoring procedure has now been adopted to ensure that inspection and approval procedures for 852 and 853 premises are being complied with.</p>	<p>The premises files relating to the 853/2004 premises audited have been reviewed and any missing information is now included. Evidence of appropriate enforcement actions on the approved establishments is now available. Inspection proformas have been adopted for 852 and 853 premises. An Internal monitoring procedure has now been adopted to ensure that inspection and approval procedures for 852 and 853 premises are being complied with.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.3.23(v) Ensure that records of inspection and key details of business operations are stored in such a way that they are retrievable and provide complete records of HACCP evaluations and business compliance histories. [The Standard -7.5]</p>	<p>Completed</p>	<p>An inspection proforma based on that developed by Basingstoke and Deane is now in use for all premises inspections and is being attached to all inspection worksheets. An LGA exemplar inspection proforma is also now in use to record inspections of 853 premises. An Internal monitoring procedure has been adopted to ensure that inspection and approval procedures for 852 and 853 premises are being complied with.</p>	<p>An inspection proforma based on that developed by Basingstoke and Deane is now in use for all premises inspections and is being attached to all inspection worksheets. An LGA exemplar inspection proforma is also now in use to record inspections of 853 premises. An Internal monitoring procedure has been adopted to ensure that inspection and approval procedures for 852 and 853 premises are being complied with.</p>

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.3.23(vi) Maintain up to date, accurate and comprehensive records for all establishments including those approved under Regulation (EC) No. 853/2004 in accordance with Annexe 10 of the Food Law Practice Guidance. [The Standard -16.1]	Completed	All 853 establishment files have now been reviewed and updated and all future inspections will be recorded on amended LGA exemplar forms 853 premises. An inspection proforma based on that developed by Basingstoke and Deane is now in use for all 852 premises inspections and is being attached to all inspection worksheets. An Internal monitoring procedure has been adopted to ensure that inspection and approval procedures for 852 and 853 premises are being complied with.	All 853 establishment files have now been reviewed and updated and all future inspections will be recorded on amended LGA exemplar forms 853 premises. An inspection proforma based on that developed by Basingstoke and Deane is now in use for all 852 premises inspections and is being attached to all inspection worksheets. An Internal monitoring procedure has been adopted to ensure that inspection and approval procedures for 852 and 853 premises are being complied with.
3.4.9(i) Review and revise the enforcement policy to reflect the food enforcement service and activities. Maintain and implement the policy in accordance with the Food Law Code of Practice and other official guidance. [The Standard - 15.1]	31/03/13	A draft enforcement policy has been drawn up for the whole of Environmental Protection which will include food enforcement. This is to be approved by the management team with a view to being signed off by an appropriate member forum.	A draft enforcement policy has been drawn up for the whole of Environmental Protection which will include food enforcement. This is to be approved by the management team with a view to being signed off by an appropriate member forum.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.4.9(ii) Develop a documented procedure for the serving and enforcement of remedial action notices. Review and revise other enforcement procedures, where applicable in line with the Food Law Code of Practice and centrally issued guidance. Ensure the documented procedures are implemented for all follow-up and enforcement actions in accordance with the Food Law Code of Practice. [The Standard - 15.2]	Completed 31/03/13	A documented procedure has been drawn up for the service and enforcement of RANs. Existing prosecution templates and guidance will be drawn together in a revised prosecution procedure, and all procedures will be reviewed to ensure inclusion of E.coli guidance and primary authority referrals.	A documented procedure has been drawn up for the service and enforcement of RANs. Existing prosecution templates and guidance will be drawn together in a revised prosecution procedure, and all procedures will be reviewed to ensure inclusion of E.coli guidance and primary authority referrals.
3.5.8(i) Review, revise and fully implement the internal monitoring procedure to include risk based and proportionate documented internal monitoring in accordance with Article 8 of Regulation (EC) No. 882/2004, the Food Law Code of Practice and centrally issued guidance. [The Standard - 19.1]	31/03/13	Review, revise and fully implement the internal monitoring procedure to include risk based and proportionate documented internal monitoring.	A review of the internal monitoring procedure is currently underway with the lead Food Officer and the Food & Animal Health Manager.
3.5.8(ii) Verify the conformance of the Service with the Standard in the Framework Agreement, the Food Law Code of Practice, relevant centrally issued guidance and the Authority's own documented policies and procedures. [The Standard - 19.2]	31/03/13	Review, revise and fully implement the internal monitoring procedure to include risk based and proportionate documented internal monitoring.	A review of the internal monitoring procedure is currently underway with the lead Food Officer and the Food & Animal Health Manager.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.5.8(iii) Ensure records of internal monitoring activities are maintained. [The Standard - 19.3]	31/03/13	The internal monitoring procedure is being reviewed and this will include provision of appropriate records.	A draft internal monitoring procedure is being reviewed. This includes provision of appropriate records.
3.5.11 Revise the documented procedures to include complaints about food establishments including any Primary Authority and referral arrangements. [The Standard - 8.1]	Completed	The procedures relating to food complaints have been updated to include complaints about establishments and primary authority referral arrangements.	The procedures relating to food complaints have been updated to include complaints about establishments and primary authority referral arrangements.

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:

- Doncaster Metropolitan Borough Council draft Food Plan 2012/2013 and Additional Information. (Sept 2012)
- Document Control procedure (Oct 2012)
- Training and Competency of Food Officers (Nov 2010)
- Inspection of Food Premises (Oct 2012)
- Food hygiene rating scheme (Nov 2012)
- Procedure for the Approval of Premises (Oct 2012)
- Procedures for the Investigation of Food Complaints (Oct 2012)
- Premises Database Sept 2010
- Procedure for Food Sampling Sept 2010
- South Yorkshire Food Safety Law Enforcement protocol (July 2012)
- Various enforcement procedures (Oct 2012)
- Monitoring Procedure Nov 2010
- Minutes of meetings of South Yorkshire Food Hygiene Liaison Group (various dates 2011)
- Minutes of meetings of Regulation and Enforcement Team (various dates 2012)
- Officer authorisation, training and qualification records

(2) File reviews

The following LA file records were reviewed during the audit:

- General food premises inspection records
- Approved establishment files
- Food and food premises complaint 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:

- Food and Animal Health Manager
- Food Compliance Officer
- 3 Environmental Health Practitioners, including the Food Lead Officer

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 to a local food business. The purpose of the visit was to verify the outcome of the last inspection carried out by the LA 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 safety 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.