

# **Audit of Local Authority Service Delivery Controls for Incidents and Alerts**

Kent County Council  
17-18 September 2015



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## **1.0 Introduction**

- 1.1 This is a report on the outcomes of the Food Standards Agency's (FSA's) audit of Kent County Council, conducted on the 17 and 18 September 2015 at Kent County Council offices at Javelin Way, Henwood Industrial Estate, Ashford, Kent, TN24 8AD. The audit was carried out as part of a programme of audits on Local Authority (LA) controls for incidents and alerts.
- 1.2 The audit was carried out under section 12(4) of the Food Standards Act 1999 and the Agency will produce a summary report covering outcomes from the audits of all local authorities assessed during this programme. This report has been made available on the FSA's website at:

[www.food.gov.uk/enforcement/auditandmonitoring/auditreports](http://www.food.gov.uk/enforcement/auditandmonitoring/auditreports)

Hard copies are available from the FSA's Operations Assurance Division at Foss House, Peasholme Green, York, YO1 7PR. Tel: 01904 232116

- 1.3 Kent County Council is a local authority with responsibility for food standards and feed official control for a County with a population of 1.49 million divided between 12 District Councils. The port of Dover lies within the County.
- 1.4 Food standards and feed hygiene service delivery were the responsibility of the Trading Standards team. The team had recently completed a major re-structure which had come into being on 1 September 2015, reducing the number of heads of service and merging two sets of generic area-based teams into four theme-orientated County-wide teams. There was also a new lead food officer in post, based in one of the four teams. All four teams had responsibility for varying proportions of food and feed work. Normal working hours were Monday to Friday from 08:00 to 18:00.
- 1.5 The lead food officer was one of four Operations Managers who reported to the Head of Trading Standards. Trading Standards was located within the Public Protection Division.

## **2.0 Scope of the Audit**

- 2.1 The audit focused on controls that the LA had in place to deal with incidents and alerts with reference to the Framework Agreement and the Food/Feed Law Codes of Practice (F/FLCoP). This included organisation and management, resources, development and implementation of appropriate control procedures, receipt of and response to alerts, reporting of incidents, advice to businesses, enforcement, sampling, premises database, training and authorisation

of officers, liaison and internal monitoring. In addition, views on current arrangements for incidents and alerts were sought to inform FSA policy development.

### **3.0 Objectives**

3.1 The objectives of the audit were to gain assurance that:

- The Authority had adequate capability and effective controls in place to deal with incidents and alerts with reference to the requirements of the Standard in the Framework Agreement, the F/FLCoP and centrally issued guidance.
- The interface between the FSA and LAs with regard to the handling of incidents and alerts was appropriate and effective.

3.2 The audit also sought to;

- Identify any significant weaknesses and potential improvements in the overall arrangements for the handling of incidents and alerts.
- Identify and disseminate good practice for incidents and alerts controls

### **4.0 Executive Summary**

4.1 The interface between the FSA and the Authority was for most part effective in the management and reporting of incidents and the response to food and feed alerts. However the Authority needed to make improvements to fully meet the requirements of the Framework Agreement and the Food and Feed Law Codes of Practice (F/FLCoP) and to put in place a system capable of responding to alerts outside normal office hours. A number of potential improvements in the overall arrangements and controls for incidents and alerts were identified. The key areas for improvement for the LA are set out below.

#### **4.2 Key areas for LA improvement:**

##### **Incidents and Alerts**

4.2.1 A number of procedures had not been set up and documented, including procedures for the management of incoming alerts and of food/feed incidents.

4.2.2 No out of hours food/feed alert and incident response arrangements had been established.

### **Organisation and Management**

- 4.2.3 Within the Service Plan, the resources required for service areas including Incidents & Alerts had not been estimated and compared with those available. No service performance review had been carried out, documented and presented to the relevant Member or delegated senior officer in the last year, contrary to the Standard in the Framework Agreement. It is essential that Members are kept informed of performance in service delivery.
- 4.2.4 The service's enforcement policy had not been approved by the relevant Member forum or delegated senior officer.

### **Database**

- 4.2.5 The accuracy of the food establishments database was limited due to inspection resource being focused on high risk premises only, incomplete notification of new establishments and some closed establishments remaining on the database.

### **4.2.6 Liaison – Point of Entry**

The Authority had no liaison arrangements in place with Dover Port Health Authority, despite occasional imports of low risk feed.

### **Internal Monitoring**

- 4.2.7 There was no evidence of any internal monitoring with the exception of business satisfaction questionnaires.

## **5.0 Audit Findings and Recommendations**

### **5.1 Organisation and Management**

- 5.1.1 The Authority had developed a documented Feed & Food Service Plan for 2015-16. Some additional delivery points and principles were contained within a referenced set of Service Priority Delivery Plan documents.
- 5.1.2 Auditors were also presented with the Business Plan for the Directorate within which Trading Standards was placed. This plan outlined the contribution of the service to the Authority's Strategic Statement together with broad strategic objectives and directorate-wide performance indicators.
- 5.1.3 The Service Plan generally followed the structure of the service planning guidance in the Framework Agreement but did not identify the resources required to deliver the service and compare them with the resources available to identify any shortcoming. This included the number of FTEs for food and feed as well as the resource required to deliver an incidents and alerts response.

- 5.1.4 As required by the Framework Agreement the Service Plan included a specific section for feed/food safety alerts and incidents which made reference to appropriate FSA guidance, the receipt of alerts and liaison with district council environmental health services. However this did not set out the provision of an out of hours service for this aspect of service delivery.
- 5.1.5 No performance review based on the service plan had been carried out, documented and presented to the relevant member forum or delegated senior officer in the last year, contrary to the Standard. It is essential that members are kept informed of performance in service delivery.

### **Recommendations**

5.1.6 The Authority should:

- (i) Draw up, document and implement the next service delivery plan in accordance with the Service Planning Guidance in the Framework Agreement. Include in this plan an identification of the resources required to deliver the handling of incidents and alerts and compare them with the resources available to identify any shortcoming. The Plan should also outline the extent of the out of hours arrangements for the team. [The Standard - 3.1]
- (ii) Carry out and document a performance review of the last year based on the Service Delivery Plan and submit it for approval to the relevant member forum or, where appropriately delegated, the relevant senior officer. [The Standard - 3.2]

## **5.2 Incidents and Alerts**

### Incidents & Alerts Procedures

- 5.2.1 The Authority had developed a documented flowchart as part of its "Trading Standards Duty Intelligence Workflow" for responding to work inputs including food/Feed alerts. This outlined the criterion for daily response and tasking in the event of a Food/Feed Alert for Action. However there was no alert procedure describing the Authority's internal receipt and dissemination of alerts, responsibilities, product withdrawals, recall notices, liaison arrangements with external authorities and agencies and out of hours service provision including the provision of access to adequate equipment, database, e-mail and storage facilities.

- 5.2.2 There was no procedure in place for responding to food and feed safety incidents, although the Food Feed & Fertilizer Inspection Procedure made reference to the duty to report an incident to the FSA, outlined procedures for the seizure, detention and voluntary surrender of food and feed and cited the F/FLCoP as reference documents. An incident procedure should include reference to liaison arrangements with external authorities and agencies and out of hours service provision including the provision of access to adequate equipment, database, e-mail and storage facilities.
- 5.2.3 In practice, the authority maintained a computer system capable of receiving feed and food alerts by e-mail and had a nominated team to monitor and pass alerts to the lead food officer via an office diary, who would then monitor and distribute to officers accordingly. Alert responses were recorded under a single service request allowing for efficient monitoring. No procedure specified the lead officer for incidents and alerts nor the requirement for officers to document their responses to alerts.
- 5.2.4 The Authority advised auditors that it routinely submitted intelligence reports to the Agency but was unable to provide evidence to demonstrate this.

#### Out of Hours Arrangements

- 5.2.5 Despite the provision of a telephone contact centre for Kent residents which operated 24 hours a day, 7 days a week, there was no established system in place for the receipt and management of food alerts outside normal office hours, including liaison arrangements with District Councils and organisations outside the Authority. Auditors were advised by the lead food officer that alerts received outside office hours would be assessed and responded to the next working day at the earliest.

#### Incident Notifications

- 5.2.6 Records for four incident notifications to the FSA were checked. The FSA was appropriately notified on all but one occasion. In one instance relating to an aflatoxin failure from an informal sample there was a delay in notification to the FSA of approximately 3 months until a formal sample had been taken. It was also noted that one notification required "quarantine" following assessment by the FSA incidents team. Auditors could not however find evidence to show subsequent visits or enforcement action at the affected premises. In all instances there was good evidence to show appropriate liaison with home and originating authorities.

## Food Alerts

- 5.2.7 Records for two food alerts for action were examined. Both alerts had been recorded on the LA database and given a unique reference and details had been cascaded to officers. Auditors were advised that there was an arrangement in place to liaise with Kent EH departments through the Kent FTG and for EH departments to take the lead in responding to alerts in most cases. Both alerts checked were passed to the district councils for action the next working day. Auditors noted that where possible, alerts should be passed to the Districts as soon as possible on the same day.
- 5.2.8 Auditors were unable to confirm if this partnership approach with the Districts actually resulted in visits to premises for the two alerts examined. This liaison arrangement would benefit from a documented clarification of the division of responsibilities.

### **Recommendations**

- 5.2.9 The Authority should:
- i) Set up, maintain and implement a documented procedure for initiating and responding to food and feed alerts, in accordance with the relevant Codes of Practice including reference to the lead food officer, liaison arrangements with external authorities and agencies and out of hours service provision including the provision of access to adequate equipment, database, e-mail and storage facilities and the requirement to document the response to and outcome of each alert. [The Standard - 14.1]
  - ii) Set up, maintain and implement a documented procedure for responding to food and feed incidents which includes reference to the lead food officer, liaison arrangements with external authorities and agencies and out of hours service provision including the provision of access to adequate equipment, database, e-mail and storage facilities. [The Standard - 14.4]
  - iii) Notify the FSA of food hazards/incidents promptly and carry out associated food law enforcement in accordance with the relevant Codes of Practice and centrally issued guidance. [The Standard – 14.5 & 15.3]



### **5.3 Advice to Business**

- 5.3.1 The authority displayed food and feed alerts together with other product alerts on the authority's website, links to FSA pages, a link to contact information for the authority and an e-mail alerts registration service. The webpages were comprehensive. Auditors observed that pages would benefit from the inclusion of a call to action to prompt the public to report any product found where subject to a FAFA.
- 5.3.2 The authority's website also had a page displaying product withdrawals, however the link to this page was not working at the time of audit.
- 5.3.3 The authority was able to provide evidence of proactive liaison with business it had carried out following a food Alert relating to DNP. A number of businesses had been contacted and some followed up with a visit, and there had been liaison with District Councils through the Kent Food Technical Group to agree a coordinated response.

### **5.4 Food Inspection and Sampling**

- 5.4.1 The team had developed a combined documented food & feed sampling policy and procedure which was appropriate. The procedure included a reminder to report incidents to the FSA where relevant and made reference to the procurement and storage of food and feed samples.
- 5.4.2 Auditors examined three sampling records. In two out of the three checked there was evidence to demonstrate notification of a food hazard to the FSA following detection of undeclared ingredients and presence of contaminants. The third was correctly risk assessed and did not require an incident notification to the agency. In all instances there was good evidence to show liaison with other Authorities when appropriate.

### **5.5 Enforcement**

- 5.5.1 The Authority had developed a documented Trading Standards Enforcement Policy which took into account the Regulators' Code and was generally in line with official guidance. The policy identified most enforcement options available to the Authority and the circumstances under which they should be used.
- 5.5.2 The policy had been published on the authority's website but it had not been approved by the relevant member forum or relevant senior officer with delegated authority.
- 5.5.3 The authority had outlined procedures for the detention, seizure and voluntary surrender of food and feed which were generally in

accordance with the relevant codes of practice and official guidance. However they would benefit from the inclusion of some work instruction on the method of safe disposal of surrendered and condemned food and feed and/or liaison with district councils in this regard, with the emphasis on removing unsafe food and feed from the market as quickly as possible. There were also no procedures outlining how the Authority dealt with illegally imported food or feed found inland.

- 5.5.4 Auditors were advised that in practice, any detention or seizure enforcement required was negotiated with the District Councils through the Food Technical Group, with those authorities usually taking on the enforcement role.
- 5.5.5 The authority reported no detention, seizure and voluntary surrender of food or feed in the last two years.

### **Recommendation**

5.5.6 The Authority should:

- (i) Submit the Enforcement Policy for approval to the relevant Member forum or, where approval and management of service delivery plans has been delegated to senior officers, to the relevant senior officer. [The Standard – 15.1]
- (ii) Amend the enforcement procedures to reflect existing enforcement, follow up and liaison actions in accordance with the relevant Codes of Practice and official guidance, to include the safe disposal of surrendered and condemned food and feed and enforcement regarding illegally imported food or feed found inland. [The Standard – 15.2]

## **5.6 Authorised Officers**

- 5.6.1 The Authority had developed a documented procedure for the authorisation of officers. The procedure was based on an assessment of competence indicating the post/s responsible for assessing competence at the authority, but did not specify the correct qualification requirements necessary for food standards officers as prescribed by the F/FLCoP. The procedure was limited to officers of the “Compliance-Food Chain” team and did not make reference to the F/FLCoP induction requirements for newly appointed officers and officers returning to food work after a period

of absence. Further, the Lead food officer confirmed that there was no formal induction procedure which was aligned to the FLCoP in place for officers new to food.

- 5.6.2 The authority had appointed a lead officer for food standards and feed control. The officer had the necessary specialist knowledge to perform this role.
- 5.6.3 Records for five Authorised Officers were checked. All officers were found to be suitably qualified for the level of authorisation. Authorisations however did not reference all relevant food and feed legislation e.g. Official Feed and Food Control Regulations 2009. Authorisations should be reviewed to ensure that officers carrying out official food and feed controls are adequately authorised.
- 5.6.4 Training records were examined and these demonstrated that all officers were receiving the minimum 10 hours relevant training per annum based on the principles of continuing professional development in the period 2014 – 2015. No evidence could be found of subject specific training in Incidents and Alerts for any of the officers.
- 5.6.5 The authority maintained records of training on the Oracle database. However some officers could not produce original documentation to support CPD claims.
- 5.6.6 Training needs were assessed through a combination of corporate appraisals and one-to-one interviews. Auditors were advised that training aligned with strategic priorities took priority.

### **Recommendations**

5.6.7 The Authority should:

- (i) Review and amend its authorisation procedure to apply to all officers with food and feed duties, newly appointed food and feed officers and to include reference to the necessary qualifications in accordance with the F/FLCoP. [The Standard – 5.1]
- (ii) Appoint a sufficient number of authorised officers to carry out the work set out in the service delivery plan, including work relating to imported food and feed. [The Standard – 5.3]
- (iii) Maintain records of relevant training of each authorised officer in accordance with the F/FLCoP. [The Standard – 5.5]

## **5.7 Reviewing and Updating Documented Policies and Procedures**

- 5.7.1 The Authority reviewed procedures reactively but had no formal proactive system for review at regular intervals.
- 5.7.2 Procedures were held on the Authority's "K" drive, however there was no document control system in place. The Authority should put a system in place which includes regular review, version control and removal of superseded documents from the authority.

### **Recommendation**

5.7.3 The Authority should:

- (i) Develop, maintain and implement a control system for all procedures relating to its food and feed standards enforcement activities to ensure that all are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance and that superseded documents are removed from use throughout the Authority. [The Standard – 4.1 & 4.2]

## **5.8 Facilities and Equipment**

- 5.8.1 The authority had in place a reliable computerised software package which was capable of providing information required by the FSA and specifically with regard to incidents and alerts.
- 5.8.2 The database, together with other electronic documents used in connection with food and feed law enforcement services was subject to end of day back-up to prevent the loss of data.
- 5.8.3 Officers had been provided with individual passwords and access for entering new premises data had been restricted.

## **5.9 Food Premises Database**

- 5.9.1 The Authority maintained a database of food and registered feed establishments.
- 5.9.2 The team had no documented procedure to ensure the accuracy and reliability of its database, other than a procedure describing the process for visit entry. There was a limited procedure for feed; the feed procedure simply outlined the manner of entry of new feed

registrations. Auditors were advised that a feed data cleansing exercise had been carried out and completed within the last year.

- 5.9.3 Whilst some District Councils reported new business registrations to the County Council, this was not the case for all. Auditors were advised that no database comparisons for food and feed businesses were carried out with other KCC departments.
- 5.9.4 The authority also reported that as a consequence of focusing its inspection resource on high risk establishments only there was a large number of medium/low risk food establishments it had never visited. Additionally the service delivery plan acknowledged that businesses that have ceased trading may still appear on the food establishments database. These shortcomings serve to undermine the reliability of the database.
- 5.9.5 The authority would benefit from documenting its existing arrangements for new business entry in a procedure and increasing the scope of its database validation to proactively ensure the accuracy and reliability of its database for food and feed.
- 5.9.6 Auditors had prior to the audit randomly selected five food establishments located in the Authority's area from the internet. Of those located in the Authorities area four out of five found were found to be correctly listed on the database and subject to the inspection programme.

#### **Recommendation**

5.9.7 The Authority should:

- (i) Set up/review as appropriate, maintain and implement a documented procedure/s to ensure the food and feed premises database is accurate, reliable and up to date.  
[The Standard – 11.2]

#### **5.10 Liaison with other Organisations**

- 5.10.1 The Authority had liaison arrangements in place for food and feed with officers attending the Regional Groups including:
- Trading Standards South East Food Focus Group
  - Trading Standards South East Feed Focus Group
  - Kent Food Technical Group

- 5.10.2 Auditors noted that the Kent FTG had only been attended and briefed once in 2015. It is important to maintain good liaison arrangements with the District Councils to facilitate efficient effective and consistent enforcement and reduce the burden on business, through issues such as database accuracy, division of enforcement responsibilities and provision of advice to business.
- 5.10.3 Proactive liaison also took place with other agencies from time to time, including the UK Border Agency (UKBA), Medicines and Healthcare Regulatory Agency (MHRA), Association of Port Health Authorities (APHA) and a number of External Temporary Storage Facilities (ETSFs).
- 5.10.4 The Authority reported no Primary Authority relationships in place with food businesses in Kent. Auditors were advised that no food or high risk feed was imported through the port and that there were established liaison arrangements in place with the UK Border Agency which provided ongoing intelligence in the event of any feed imports, allowing the Authority to respond accordingly. However there were no established liaison arrangements with Dover Port Health Authority

### **Recommendations**

5.10.5 The Authority should:

- i) Put in place liaison arrangements with Dover port health Authority to facilitate clear division of responsibility and efficient, effective and consistent scrutiny and enforcement at the point of entry in accordance with the relevant Codes of Practice and centrally issued guidance. Where it is the responsibility of the County Council, set up, maintain and implement documented procedures for food and feed interventions at the Port. [The Standard – 7.4 & 18.1]

## **5.11 Internal Monitoring**

- 5.11.1 The authority had included a general policy statement outlining the approach to internal monitoring of officers work against procedures in the Service Development Plan. This included carrying out business satisfaction surveys, for which the Authority provided evidence. In addition, the “authorisation and internal audit” procedure included reference to the assessment of ongoing work at regular 1-2-1 meetings, as well as during mid and year end

appraisals. Auditors were advised that such assessments involved the Operational Manager reviewing a number of case files with the officer, however no records of the monitoring review and feedback were kept.

- 5.11.2 There were no documented procedures for this monitoring or qualitative internal monitoring of other service delivery areas covered by the Framework Agreement.
- 5.11.3 The authority had no documented procedure for quantitative internal monitoring but advised auditors that due high risk food interventions, due feed interventions, contracted feed inspections and food and feed sampling undertaken was monitored monthly.
- 5.11.4 Quantitative monitoring did not include due medium and low risk food establishments.
- 5.11.5 It is essential that internal monitoring procedures are designed to ensure consistent communication and management of food and feed alerts and incidents between all four teams and with external agencies.

#### **Recommendation**

5.11.6 The Authority should:

- (i) Set up, implement and maintain documented internal monitoring procedures in accordance with Article 8 of Regulation (EC) 882/2004, the relevant Codes of Practice and centrally issued guidance to verify its conformance with all elements of the Standard in the Framework Agreement, relevant legislation and the relevant codes of practice including areas relating to incidents and alerts processes, sampling and complaints. [The Standard – 19.1 & 19.2]
- (ii) Keep a record of all internal monitoring. This should be kept for at least 2 years. [The Standard –19.3]

## **5.12 Local Authority Views on Arrangements for Incidents and Alerts**

- 5.12.1 At the conclusion of the audit the Authority was asked to provide some feedback on the arrangements in place for incidents and alerts at the FSA. The Authority was also asked for feedback on associated statutory guidance. The following is a summary;

- Relevant centrally held intelligence relating to alerts and incidents is not always conveyed to local authorities as quickly as it needs to be.
- The speed of the FSA risk assessment process has generally improved.

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**ANNEX A - Action Plan for Kent County Council**

**Audit date: 17-18 September 2015**

<b>TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)</b>	<b>BY (DATE)</b>	<b>PLANNED IMPROVEMENTS</b>	<b>ACTION TAKEN TO DATE</b>
<p>5.1.6 (i) Draw up, document and implement the next service delivery plan in accordance with the Service Planning Guidance in the Framework Agreement. Include in this plan an identification of the resources required to deliver the handling of incidents and alerts and compare them with the resources available to identify any shortcoming. The Plan should also outline the extent of the out of hours arrangements for the team. [The Standard - 3.1]</p>	<p>12/3/16</p>	<p>Prepare plan detailing resource available for year 16/17 for food, feed, etc. enforcement. This will detail our out of hour's contingency, following a current review of out of hour's arrangements.</p>	
<p>5.1.6 (ii) Carry out and document a performance review of the last year based on the Service Delivery Plan and submit it for approval to the relevant member forum or, where appropriately delegated, the relevant senior officer. [The Standard - 3.2]</p>	<p>30/4/16</p>	<p>Prepare review of performance for year 15/16. Review report for year 14/15 now superfluous as service has been substantially restructured and achievements / failures would be less relevant within that context.</p>	

<p>5.2.9 (i) Set up, maintain and implement a documented procedure for initiating and responding to food and feed alerts, in accordance with the relevant Codes of Practice including reference to the lead food officer, liaison arrangements with external authorities and agencies and out of hours service provision including the provision of access to adequate equipment, database, e-mail and storage facilities and the requirement to document the response to and outcome of each alert. [The Standard - 14.1]</p>	<p>31/12/15</p>	<p>Prepare work instruction for dealing with food and feed alerts, citing responsible posts, methodology and time constraints. This instruction will detail those alerts we will respond to, how we will record details of our response, etc.</p>	
<p>5.2.9 (ii) Set up, maintain and implement a documented procedure for responding to food and feed incidents which includes reference to the lead food officer, liaison arrangements with external authorities and agencies and out of hours service provision including the provision of access to adequate equipment, database, e-mail and storage facilities. [The Standard - 14.4]</p>	<p>31/12/15</p>	<p>See item 5.2.9(i) above – work instruction to cover these aspects as well</p>	
<p>5.2.9 (iii) Notify the FSA of food hazards/incidents promptly and carry out associated food law enforcement in accordance with the relevant Codes of Practice and centrally issued guidance. [The Standard – 14.5 &amp; 15.3]</p>	<p>31/12/15</p>	<p>See above – currently our practice is largely sufficient, but we need to record our instruction rather than simply rely on officer good practice, also ensuring it is then audited.</p>	

<p>5.5.6 (i) Submit the Enforcement Policy for approval to the relevant Member forum or, where approval and management of service delivery plans has been delegated to senior officers, to the relevant senior officer. [The Standard – 15.1]</p>	<p>31/3/16</p>	<p>Enforcement policy has previously been approved at member forum. When it is next changed we will resubmit it to appropriate members/ senior officer. Restructures across many services and levels unfortunately means finding this evidence is proving problematic. In any event the policy as is will feature in our next round of service planning which will be submitted to senior officers for approval.</p>	
<p>5.5.6 (ii) Amend the enforcement procedures to reflect existing enforcement, follow up and liaison actions in accordance with the relevant Codes of Practice and official guidance, to include the safe disposal of surrendered and condemned food and feed and enforcement regarding illegally imported food or feed found inland. [The Standard – 15.2]</p>		<p>In instances where this has been necessary local EH departments have undertaken this work. Ensure liaison procedures with districts cover these arrangements as necessary and are documented.</p>	
<p>5.6.7 (i) Review and amend its authorisation procedure to apply to all officers with food and feed duties, newly appointed food and feed officers and to include reference to the necessary qualifications in accordance with the F/FLCoP. [The Standard – 5.1]</p>		<p>See 5.6.7(iii) below.</p>	
<p>5.6.7 (ii) Appoint a sufficient number of authorised officers to carry out the work set out in the service delivery plan, including work relating to imported food and feed. [The Standard – 5.3]</p>	<p>31/3/16</p>	<p>The authorisation of officers as a whole is currently being reviewed, to ensure all officers are individually and appropriately authorised for UK or European derived legislation appropriately. This will incorporate appropriate authorisation under individual legislation as necessary, avoiding ‘blanket’ authorisations under, for example ‘European Communities Act’.</p>	

5.6.7 (iii) Maintain records of relevant training of each authorised officer in accordance with the F/FLCoP. [The Standard – 5.5]	1/4/16	Records are maintained centrally in terms of courses attended and a base time record. Officers will be instructed to keep all CPD certificates from here on and consideration will be given to maintaining a central register. A work instruction regarding appointment and CPD will be prepared.	
5.7.3 (i) Develop, maintain and implement a control system for all procedures relating to its food and feed standards enforcement activities to ensure that all are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance and that superseded documents are removed from use throughout the Authority. [The Standard – 4.1 & 4.2]	1/1/16	Work instructions / procedures will be dated and when signed off by the OM (Food Agriculture AH) will be saved on a central server as a PDF. It will be the OM's responsibility to ensure latest versions are available, with programmed, regular reviews.	
5.9.7 (i) Set up/review as appropriate, maintain and implement a documented procedure/s to ensure the food and feed premises database is accurate, reliable and up to date. [The Standard – 11.2]	1/12/15	A work instruction will be prepared to deal with maintaining the food and feed premises database, the allocation of any relevant registration numbers and so on. Liaison with Districts has already improved such that all districts now supply registration forms electronically, and a group has already met and proposed a system for the registration of feed premises. Improvements are also being made to our database to allow the storage of data about third party accreditation.	

<p>5.10.5 (i) Put in place liaison arrangements with Dover port health Authority to facilitate clear division of responsibility and efficient, effective and consistent scrutiny and enforcement at the point of entry in accordance with the relevant Codes of Practice and centrally issued guidance. Where it is the responsibility of the County Council, set up, maintain and implement documented procedures for food and feed interventions at the Port. [The Standard – 7.4 &amp; 18.1]</p>	<p>31/3/16</p>	<p>Investigate need for such arrangements. Feed importation through Dover is not a standard occurrence, whilst we have excellent liaison arrangements in place with UKBF already. Discuss with Dover DC and UKBF and put in place appropriate monitoring / liaison arrangements with them and other enforcement agencies attending the ports.</p>	
<p>5.11.6 (i) Set up, implement and maintain documented internal monitoring procedures in accordance with Article 8 of Regulation (EC) 882/2004, the relevant Codes of Practice and centrally issued guidance to verify its conformance with all elements of the Standard in the Framework Agreement, relevant legislation and the relevant codes of practice including areas relating to incidents and alerts processes, sampling and complaints. [The Standard – 19.1 &amp; 19.2]</p>	<p>1/1/16</p>	<p>Prepare a work instruction detailing a routine program of internal monitoring to maintain conformance with elements of the Code Of Practice, our work instructions, etc.</p>	
<p>5.11.6 (ii) Keep a record of all internal monitoring. This should be kept for at least 2 years. [The Standard –19.3]</p>	<p>1/4/16</p>	<p>See 5.11.6(i) above. Precise system yet to be devised with lead officer attending training on 1/2/16.</p>	

## **ANNEX B - Audit Approach/Methodology**

The audit was conducted using a variety of approaches and methodologies as follows:

- (1) Examination of LA plans, policies and procedures.
- (2) A range of LA file records were reviewed.
- (3) Review of Database records
- (4) Officer interviews

## **ANNEX C - Glossary**

Authorised officer	A suitably qualified officer who is authorised by the local Authority to act on its behalf in, for example, the enforcement of legislation.
Border Inspection Post (BIP)	A border inspection post approved under Commission Decision 2009/821/EC.
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.
Common Entry Document (CED)	A notification document which must be sent to the Designated Point of Entry in advance of an import of certain feed and food of non-animal origin from certain non-EU countries that are considered to be 'high-risk'.
Common Veterinary Entry Document (CVED)	The Common Veterinary Entry Document (CVED) is a document that the importer uses as pre-notification of an import of food of animal origin and that the BIP uses to show the outcome of the checks. The CVED is established in Commission Regulation 136/2004.
District Council	A local Authority of a smaller geographical area and situated within a County Council whose responsibilities include food hygiene enforcement.
Designated Point of Entry	A port or airport approved to carry out official controls on „high risk“ food not of animal origin detailed within Annex 1 of Regulation (EC) No 669/2009 (as amended).
Environmental Health Officer (EHO)	Officer employed by the local Authority to enforce food safety legislation.
External Temporary Storage Facility	An External Temporary Storage Facility - ETSF (formerly known as Enhanced Remote Transit Sheds – ERTS) is 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.

Feeding stuffs	Term used in legislation on feed mixes for farm animals and pet food.
Food Alert	A “Food Alert for Action” (FAFA) is a communication from the FSA to a Competent Authority concerning a food hazard or other food incident. The FSA might also issue information to Competent Authorities on product recalls or withdrawals via its Product Recall/Withdrawal Information Notices. Allergy Alerts are also issued by the FSA to quickly communicate allergen risks directly to the consumer. Competent Authorities receive copies of these Allergy Alerts for information purposes only.
Food hygiene	The legal requirements covering the safety and wholesomeness of food.
Food/Feed Incident	A “food/feed incident” is defined as any event where, based on the information available, there are concerns about actual or suspected threats to the safety or quality of food/feed and that might require intervention to protect consumers' interests.
Food standards	The legal requirements covering the quality, composition, labelling, presentation and advertising of food, and materials in contact with food.
Framework Agreement	<p>The Framework Agreement consists of:</p> <ul style="list-style-type: none"> <li>• Food and Feed Law Enforcement Standard</li> <li>• Service Planning Guidance</li> <li>• Monitoring Scheme</li> <li>• Audit Scheme</li> </ul> <p>The <b>Standard</b> and the <b>Service Planning Guidance</b> set out the Agency’s expectations on the planning and delivery of food and feed law enforcement.</p> <p>The <b>Monitoring Scheme</b> requires local authorities to submit yearly returns via LAEMS to the Agency on their food enforcement activities i.e. numbers of inspections, samples and prosecutions.</p> <p>Under the <b>Audit Scheme</b> the Food Standards Agency will be conducting audits of the food and feed law enforcement services of local authorities against the criteria set out in the Standard.</p>



Full Time Equivalents (FTE)	A figure which represents that part of an individual officer's time available to a particular role or set of duties. It reflects the fact that individuals may work part-time, or may have other responsibilities within the organisation not related to food and feed enforcement.
Internal Temporary Storage Facilities (ITSFs)	An Internal Temporary Storage Facility - ITSF (formerly known as Enhanced Remote Transit Sheds – ERTS) is 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.
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.
Rapid Alerts System for Food and Feed (RASFF)	An electronic alert system allowing information on unsafe food or feed to be shared rapidly between EU member countries. iRASFF is the electronic system allowing UK ports to share alerts of their own with the FSA.
Service Plan	A document produced by a local Authority setting out their plans on providing and delivering a food service to the local community.
Trade Control and Expert Systems (TRACES)	An online system that makes it easier for importers and exporters to provide health certification and track consignments of animals or animal products. EU official control officers at ports have access to this system for monitoring purposes.
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.