
Report on the Food Law Enforcement Service

Isle of Anglesey Council

3 - 5 June 2003

Foreword

Audits of local authority food law enforcement services are part of the Food Standards Agency Wales arrangements to improve consumer protection and confidence in relation to food. These arrangements recognise that the enforcement of food law relating to food safety, hygiene, composition, labelling, imported food and feedingstuffs is largely the responsibility of unitary authorities. These 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 inspections of food businesses and foodstuffs, sampling and analysis, internal management, food safety promotion and educational activities. It should be acknowledged that there will be considerable diversity in the way and manner in which unitary authorities may provide their food enforcement services reflecting local needs and priorities.

Agency audits assess a local authority's conformance against the Food Law Enforcement Standard "The Standard", which was published by the Agency as part of the Framework Agreement on Local Authority Food Law Enforcement and is available on the Agency's website.

The main aim of the audit scheme is to maintain and improve consumer protection and confidence by ensuring that local authorities are providing an effective food law enforcement service. The scheme also provides the opportunity to identify and disseminate good practice and provide information to inform Agency policy on food safety.

The report also contains an action plan, prepared by the Authority, to address the audit findings.

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

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1. Introduction

- 1.1 This report records the results of the audit under the headings of the Food Standards Agency Food Law Enforcement Standard and has been made publicly available on the Agency's website. Hard copies are available from the Food Standards Agency Library at Aviation House, 125 Kingsway, London WC2B 6NH, Tel: 020 7276 8181. These are subject to a reproduction and handling fee of £7.50 plus £1.50 postage and packing.

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. The audit of the food service at Isle of Anglesey County Council was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme.
- 1.3 The Authority was audited as part of the Food Standards Agency Wales programme of full audits of all 22 Welsh local authorities.

Scope of the Audit

- 1.4 The audit covered Isle of Anglesey County Council's food hygiene food standards and feedingstuffs law enforcement service. The on-site element of the audit took place at the Council's office at Llangefni Anglesey on 3 – 5 June 2003.
- 1.5 The audit assessed the Council's conformance against the Standard, using audit protocols FSA/AP3/1 – FSA/AP21/1. The Standard was adopted by the Food Standards Agency Board on 21 September 2000 and forms part of the Agency's Framework Agreement with local authorities. The Framework Agreement and the audit protocols can be found on the Agency's website.

Background

- 1.6 The Authority is situated in the North West of Wales on the Isle of Anglesey and covers an area of 71,511 hectares. It has 201 Km of coastline most of which is rural in character. Along with agriculture, tourism is the major industry on the island. The population of Anglesey is 65,400 which is estimated to double during the holiday season through day visitors and longer term stays. The port of Holyhead in the north of the island provides important links to Ireland and the shores around the island play host to a number of commercial shellfish beds.
- 1.7 Food law enforcement was carried out by officers in the Environmental Health and Trading standards sections of the Environmental Services Division situated within the Planning and Environmental Services Directorate.
- 1.8 The Council Offices were open from 08:45 – 17:00 Monday to Friday. The Authority did not have a formal out of hours service.
- 1.9 In addition to food law enforcement, the Environmental Health and Trading Standards teams were also responsible for the delivery of a range of services including occupational health and safety, pollution, private sector housing, port health, product safety, metrology, fair trading, licensing, markets and fairs and animal health enforcement work.
- 1.10 Environmental Services Team staffing level for food law enforcement detailed in the Authority's Food Service Plan 2003/2004 is shown below:

Resource available	FTE*
Enforcement Officers Food Hygiene	3.0
Enforcement Officers Food Standards & Feedingstuffs	2.5
TOTAL	5.5

*Full Time Equivalent

- 1.11 The food hygiene enforcement service consisted of 2 FTE staff undertaking inspections and a sampling officer. The Principal Officer in the food safety section was responsible for managing health and safety enforcement and carrying out port health duties in addition to food enforcement work. Their time allocated to food hygiene enforcement work was not detailed in the Food Service Plan and is therefore not included in the table above. The Authority had identified a shortfall in resource of 1 food hygiene enforcement officer and at the time of the

audit advertisements had been placed but no appointment had been made.

- 1.12 The food hygiene service financial costs were estimated for 2003/2004 to be £118,570. The costs for the food standards and feedingstuffs service were contained within the total financial resource to the trading standards service of £381,700. The Authority was unable to provide a detailed breakdown of individual areas of the service within this total.
- 1.13 The Authority's monitoring returns made to the Agency for the four quarters making up the financial year 2001/2002 indicated that the Environmental Services Division was responsible for enforcing food legislation in 1210 premises. Programmed inspection activity during this period was badly affected by the outbreak of foot and mouth disease which necessitated re-allocation of resources. The food businesses which were inspected were predominantly within the catering and retail sectors. The returns indicated that the Authority had carried out:

Enforcement activity	No.
Food hygiene inspections	446
Other food hygiene visits	442
Food standards inspections	41
Other food standards visits	44
Feedingstuffs inspections	0
Other feedingstuffs visits	0
Informal samples	2
Formal samples	390

2. Executive Summary

2.1 The Authority was maintaining a level of activity across the range of responsibilities covered by the service. However, resource issues had meant that historically the service had not been as active as might be expected, particularly in relation to its food standards inspection programme. It was noted that the Authority had not undertaken any formal enforcement action in the 2 years preceding the audit.

The recent work carried out to implement the full range of requirements of the Standard together with proposed increases in staffing levels should ensure that the Authority provides a more comprehensive and effective service.

2.2 The Authority's Key Area for Improvement

Inspection Frequency

Food standards inspections were not being carried out at the minimum frequencies required by the Food Safety Act Codes of Practice No.8: Food Standards Inspections. Inspections carried out within the minimum frequencies ensure that risks associated with the operation of food businesses are identified in a timely manner.

Audit Findings

3. Organisation and Management

- 3.1 The Authority operated under the “Cabinet style” of local government with an Executive comprising of a Leader and Deputy Leader together with 7 other members each with their own portfolio. The member with portfolio for Healthy and Safe Communities covered most of the area of responsibility of the food enforcement service.
- 3.2 The Authority had 5 Directorates, and delivery of the food safety service was the joint responsibility of the Environmental Health and Trading Standards Sections of the Environmental Services Division, within the Planning and Environmental Services Directorate.
- 3.3 The corporate planning framework included the Best Value Performance Plan (BVPP) for 2002 -2003. The timetable for the review of corporate services had been severely affected by the food and mouth outbreak, and had been put on hold until a “whole authority analysis” had been completed. The Authority had 5 Corporate objectives.
- To ensure the economic prosperity of the Island and provide educational and training opportunities to people of the Island;
 - To deliver services of the highest quality to meet the aspiration of the people of the Island;
 - To promote and protect a sustainable and safe environment;
 - To promote the Island’s heritage and Welsh language;
 - To promote the social welfare of the Island’s communities.
- 3.4 The BVPP contained information about the service, details of performance in previous years, and set out key actions and performance indicators for the forthcoming year. The performance indicator used for food safety was:
The percentage of food premises inspections that should have been carried out, that were carried out for
(a) high risk premises, (target 100%)
(b) other premises. (target 90%)
- 3.5 In 2001/2002, the Authority reported having carried out 89.6% of high risk inspections and 91.5% of inspections of other premises, while in 2002/2003 it was reported that the actual performance was 100% in both categories.

- 3.6 The Authority had drawn up a comprehensive draft Food Service Plan for 2003/2004, which was in line with the Service Planning Guidance in the Framework Agreement on Local Authority Food Law Enforcement. The Service Plan was fully approved by the relevant Member forum on 27th May 2003.
- 3.7 A review of the 2002/2003 BVPP had been undertaken prior to the audit. A performance review of the Food Service Plan 2002/2003 had been carried out which was approved by members on 27th May 2003 it included identification of variation from the previous years plan and highlighted areas of service improvement required for the forthcoming year.

4 **Review and Updating of Documented Policies and Procedures**

4.1 The Authority had drawn up a number of documented procedures for many areas of its food law enforcement activity. It had recently drawn up a document control procedure to cover documents related to food hygiene enforcement. Annual review of relevant documentation was included as part of the document control procedure. However the procedure did not cover food standards or feedingstuffs enforcement.

4.2 Staff had access to updated electronic commercial food law encyclopaedias and hard copies of all documentation necessary for carrying out enforcement activities, including appropriate legislation and guidance. A small number of superseded hard copies of approved guidance were present in the department's library resource.

Recommendations

4.3 The Authority should:

- (i) Further develop and implement the control system to ensure that all documented policies and procedures relating to food law enforcement are reviewed at regular intervals, and whenever there are changes to legislation or centrally issued guidance. [The Standard – 4.1]
- (ii) Ensure that all documentation relating to its enforcement activity is included within the control system and that any changes to documentation are appropriately authorised and any superseded documents removed from use or are clearly identified as superseded. [The Standard – 4.2]

5 **Authorised Officers**

- 5.1 The Authority had appointed 2 lead officers with the necessary specialist knowledge; one for food hygiene enforcement and the second for food standards and feedingstuffs enforcement.
- 5.2 The Authority had produced a scheme of delegation which authorised individual officers to exercise specific powers. However senior managers had been authorised to undertake food enforcement duties without appropriate update training and maintenance of relevant experience. In practice all officers were carrying out duties in accordance with their qualifications training and experience.
- 5.3 The Authority does not operate a formal out of hours service. If serious issues relating to food enforcement arose outside normal working hours the auditors were informed that contact would be made with a suitably authorised officer at the earliest opportunity, though this arrangement relied on “goodwill”.
- 5.4 The Department had Investors in People status with an appraisal scheme in place and an annual staff development review. An action plan was produced as part of each staff appraisal which detailed individual officers training needs. These were drawn together to produce an annual training programme for the service.
- 5.5 The Authority had a documented procedure for the authorisation of officers.
- 5.6 The Authority was not maintaining complete records of officer’s relevant academic or other qualifications and training. In addition where records of training were available, they required expanding to include details of course content, objectives, duration, and assessment of the training.
- 5.7 No breakdown of the budget available for training provision within the Food enforcement service was available at the time of the audit. However, it was apparent from the quantity and relevance of courses undertaken, that the Authority was committed to providing its staff with appropriate training.

Recommendations

5.8 The Authority should:

- (i) Ensure that all staff authorised to carry out food enforcement duties receive appropriate training and are suitably experienced. [The Standard - 5.3]
- (ii) Record the content, objectives, duration and any assessment made of training courses attended by food enforcement staff. [The Standard - 5.4]
- (iii) Record the relevant academic or other qualifications and training of food enforcement staff. [The Standard - 5.5]

6 Facilities and Equipment

- 6.1 The Authority had made available all the equipment and facilities necessary to permit all activities associated with the service to be carried out.
- 6.2 The Authority had a documented procedure for the calibration of thermometers used by officers. In addition forms had been produced to record the calibration checks on thermometers and temperature checks on refrigeration equipment used to store food items under investigation. The procedure did not however include details of the acceptable tolerances for the equipment, frequencies of checks action to be taken where results are outside tolerances and routine checks made by officers between the manufacturer's calibration checks.
- 6.3 The computer software operated by the Authority was capable of providing statistical information requested by the Food Standards Agency. The Authority had a corporate procedure to ensure that appropriate back up systems were implemented to minimise the risk of corruption or loss of information held on the databases.

Recommendation

- 6.4 The Authority should:

Review and implement the documented procedure for calibration to ensure that all temperature measuring instruments are calibrated and checked in full accordance with Food Safety Act Code of Practice No 10: Enforcement of the Temperature Control Requirements of Food Hygiene Regulations. [The Standard – 6.2]

7 Food and Feedingstuffs Premises Inspections

Food Hygiene

7.1 In its Service plan for 2003/2004 the Authority reported a total of food premises:

Risk Category	No.	%*
A	0	0
B	52	6
C	484	56
D	129	15
E	157	18
F	40	5
Unrated	0	0
TOTAL	862	

* Figures rounded

7.2 The Authority identified 23 premises as licensed under the Food Safety (General Food Hygiene) (Butchers' Shops) (Amendment) (Wales) Regulations 2000, and 13 premises approved under product specific legislation (Approved Premises).

7.3 The inspection histories of 10 general premises and 6 Approved Premises were examined. In 4 cases inspections had not been carried out at the minimum frequencies required by Food Safety Act Code of Practice No 9: Food Hygiene Inspections. In addition a check of the computer records indicated the Authority had 4 premises overdue for inspection that had previously been inspected, and 25 new premises awaiting their first inspection.

7.4 The Authority had implemented a documented inspection procedure, which covered general premises, and made limited reference to those premises approved under product specific regulations although it did not include butchers premises requiring licensing. Standardised inspection reports and inspection forms were used to record inspection findings together with business details.

7.5 Officers with the appropriate levels of authorisation carried out thorough inspections of general premises and provided accurate risk ratings, in accordance with official guidance. Appropriate follow up action had been taken in all instances where instances of non compliance had been identified including revisits within the appropriate time.

7.6 Reports had been sent to proprietors following inspections of general premises. Reports were clear and legal requirements were

distinguished from recommendations. The works required following inspections were clearly identified, took into account Industry Guides and were consistent with centrally issued guidance. However in 5 of the reports incorrect or incomplete legislative references had been quoted.

7.7 There was a limited history of enforcement with all Approved Premises. In 5 of the 6 Approved Premises files examined no approval document was present and in the case of the 1 approval document that was present it did not list the products approved.

7.8 Ten hard copy files relating to butchers premises which required a licence, were examined and shown to contain comprehensive details of the operation of the business, including officer's assessments. Standard application and inspection forms had been used and applications had all been determined within 28 days.

Recommendations

7.9 The Authority should:

- (i) Ensure that food hygiene inspections are carried out at the minimum frequencies required by Food Safety Act Code of Practice No. 9: Food Hygiene Inspections. [The Standard – 7.1]
- (ii) Ensure that the approval process and Approved Premises inspections are carried out in full accordance with the relevant legislation and official guidance. This should include a review of existing approvals. [The Standard – 7.2]
- (iii) Revise the existing documented inspection procedure to make more specific reference to Approved Premises and include butchers licensing inspections. [The Standard – 7.5]

Food Standards and Feedingstuffs

7.10 In the Service Plan for 2003/2004 the Authority reported that there were 975 premises subject to food standards inspections and 170 premises subject to feedingstuffs inspections.

Food Standards Inspections

Risk Category	No.	%*
High	27	3
Medium	356	37
Low	592	60
TOTAL (Rated premises)	975	

* Figures rounded

Feedingstuffs Inspections

Risk Category	No.	%*
High	5	3
Medium	105	62
Low	60	35
TOTAL	170	

* Figures rounded

- 7.11 The inspection histories of 10 food standards premises were examined. In 8 cases inspections had been carried out at the minimum frequencies required by Food Safety Act Code of Practice No 8: Food Standards Inspections. However, a check of the computer records indicated the Authority had 431 premises overdue for inspection.
- 7.12 Inspection reports had been issued in the case of all 10 premises files examined. Information on non manufacturing premises was limited and generally there was insufficient information on file to assess whether the inspections had been carried out in accordance with the relevant legislation or if compliance with legally prescribed standards had been assessed. File information on manufacturing premises was more comprehensive.
- 7.13 The Authority had documented inspection procedures for food standards and feedingstuffs which formed part of their enforcement procedural documents.
- 7.14 The inspection histories of 8 feedingstuffs premises files were examined. Inspection dates were recorded on the database but otherwise information on the premises was limited making an assessment of whether inspections had been carried out in accordance with the relevant legislation and legally prescribed standards difficult.

Recommendation

7.15 The Authority should:

Ensure that food standards inspections are carried out at the minimum frequencies required by Food Safety Act Code of Practice No. 8: Food Standards Inspections.

[The Standard – 7.1]

8 Food, Feedingstuffs and Food Premises Complaints

- 8.1 The Authority had documented policies and procedures relating to food hygiene, food standards and feedingstuffs complaints. This included standard forms for recording the complaint, submission of the complaint to the public analyst or food examiner and a number of standard letters used to correspond with the complainant, retailer/manufacturer and home/originating authority.
- 8.2 Records relating to 10 food hygiene and food premises complaints were examined. Files showed that generally complete data had been recorded about the complaint and appropriate investigations had been carried out. In 4 files there was no evidence to show that all the parties involved had been kept informed of the progress of the complaint as required by the Authority's procedure.
- 8.3 Records relating to 8 food standards complaints were examined. Files showed that generally complete data had been recorded about the complaint and that appropriate investigations had been carried out. However, in 2 cases the records related to issues other than complaints, indicating inappropriate identification of the type of activity on the computer database.
- 8.4 The Authority had received no complaints relating to feedingstuffs.

Recommendation

- 8.5 The Authority should:

Ensure appropriate action is taken on complaints received in accordance with the centrally issued guidance and the Authority's own procedures. [The Standard – 8.2]

9 Home Authority Principle

- 9.1 The Service Plan 2003/2004 stated that the Authority fully supported the Home Authority Principle. The records showed that the Authority acted as Home Authority for 10 local businesses on food standards issues, and acted in on informal basis for a number of premises for food hygiene. It had not updated details of the home authority premises or contact officers, held by the Local Authorities Co-ordinators of Regulatory Services (LACORS).
- 9.2 The Authority had produced and implemented a procedure relating to the adoption of a home authority agreement with a particular business. This included model forms of agreement and contact details of both parties, together with criteria with which the business was required to comply before the agreement could be confirmed.
- 9.3 Officers had access to the LACORS website to identify listed Home Authorities. There was evidence on files examined that due regard was given to information received following liaison with Home Authorities during the course of investigations. Evidence was also found that advice was provided to enforcing authorities contacting the Service regarding Home Authority issues.

10 Advice to Business

10.1 In addition to the advice given during the course of inspections, the Service was able to demonstrate other approaches used to help businesses comply with the law. These included the following:

- A range of official and internally produced advice leaflets for caterers and food handlers covering both food hygiene and food standards issues.
- The issue of a document entitled “Guidance Notes for the Food Industry, Food Safety Hazard Analysis” to food businesses as a guide to implementing an effective food management system.
- In addition to the above mentioned document aimed at general premises the Authority had also produce similar guidance specifically aimed at nursing and residential care homes, and nurseries and crèches.
- A programme of visits targeting local butchers to assist them in fully implementing the requirements of the beef labelling rules.
- A seminar for organic farmers and manufacturers on the issues of weights and measures and food labelling.

10.2 The was no evidence to suggest that the Authority was providing advice to businesses in relation to feedingstuffs.

10.3 *Recommendation*

The Authority should:

Expand its advice to businesses to include feedingstuffs.
[TheStandard – 10.1]

11 Food and Feedingstuffs Premises Database

- 11.1 The Authority had a computer database of the food premises and feedingstuffs premises in its area.
- 11.2 The Authority had set up and implemented a documented procedure to ensure that the database was accurate and up to date. Officers had password protected access to the databases, and were restricted from creating or deleting records.
- 11.3 The database was examined for 12 food premises that had been randomly identified from a current edition of a business directory. All of the premises were present on the Authority's database and were included within the inspection programme.

12 Food and Feedingstuffs Inspection and Sampling

- 12.1 The laboratories used by the Authority were properly accredited.
- 12.2 The Authority had a documented sampling policy contained within the Food Service Plan covering food and feedingstuffs which indicated the purpose of food sampling the basis on which the sampling programme would be produced and the types of samples to be taken. The Authority had also produced a policy document for food and water sampling which reiterated these issues.
- 12.3 The Service plan estimated the 2004/2004 sampling costs for food standards as £8,500 and for feedingstuffs as £3232. The cost of microbiological sample analysis being met by the Public Health Laboratory Service.
- 12.4 Estimated sampling levels for 2003/2004 were as follows:
- Microbiological sampling 392 per annum,
 - Food Standards sampling 163 per annum,
 - Feedingstuffs sampling 20 per annum.
- 12.5 The Authority had produced programmes for food standards and microbiological sampling, although these did not identify specific premises.
- 12.6 The Authority had sampling procedures covering microbiological, food standards and feedingstuffs sampling. These were in accordance with the relevant Food Safety Act Code of Practice and centrally issued guidance.
- 12.7 The file records of 10 unsatisfactory microbiological samples and 10 unsatisfactory food standards samples were examined. All appeared to have been obtained in accordance with sampling policies, programmes and procedures. All results were recorded on the appropriate files with notification to proprietors. However, in the case of 6 microbiological samples there was no evidence of any appropriate follow up action with the premises concerned.

Recommendation

12.8 The Authority should:

Take appropriate action in accordance with the enforcement policy when sample results are considered not to be satisfactory.
[The Standard – 12.6]

13 Control and Investigation of Outbreaks and Food Related Infectious Disease

- 13.1 The Authority had a documented procedure in relation to the control of outbreaks of food related infectious disease, which had been drawn up in conjunction with the Health Authority, the Public Health Laboratory Service and other relevant organisations including neighbouring North Wales Authorities. The Auditors were informed that there had been no recent outbreaks of food related infectious disease in the Authority's area. The plan had not been reviewed or tested.
- 13.2 A procedure detailing the investigation of sporadic cases of food related infectious disease had been prepared by the Authority which included a comprehensive set of advice notes, questionnaires and standard letters.
- 13.3 The file records of 6 individual notifications of food related infectious disease were examined. The records of 2 cases were insufficiently detailed to determine if an appropriate investigation had been carried out and in the remaining cases file records were incomplete with incomplete investigation forms, lack of evidence of standard letters being sent and in one case, confusion over what was the causative organism.

Recommendations

- 13.4 The Authority should:
- (i) Ensure that the procedure for the control of outbreaks of food related infectious disease is reviewed in association with the Health Authority and any other relevant organisations and is tested as specified.
[The Standard – 13.1]
 - (ii) Carry out investigations of sporadic cases in full accordance with the documented procedure for the investigation of notifications of food related infectious disease.
[The Standard – 13.2]

14 Food Safety Incidents

- 14.1 The Authority had set up and implemented documented procedures for dealing with Food Hazard Warnings (FHWs) received from the Food Standards Agency which included informal out of hours contact arrangements.
- 14.2 The Authority's computer system was capable of receiving food hazard warnings and copies of all FHWs issued in the last year were available. The Authority's responses to FHWs were appropriate and were being recorded.
- 14.3 The auditors were advised that no serious localised incidents or wider food safety problem had occurred in the last two years which would have required notification to the Food Standards Agency in accordance with Food Safety Act Code of Practice No. 16: Enforcement of the Food Safety Act 1990 in relation to the Food Hazard Warning System.

15 Enforcement

- 15.1 The Authority had adopted the local authority Enforcement Concordat
- 15.2 The Authority had developed an enforcement policy for the Environmental Services division which had formally been approved by members in April 2003. A hard copy of the document was available and it had also been posted on the Authority's website.
- 15.3 The Authority had undertaken 3 voluntary surrenders and 1 formal caution as the only enforcement activity in the 2 years preceding the audit. The former were undertaken as part of food hygiene enforcement and the latter as part of food standards enforcement.
- 15.4 The 3 files relating to voluntary surrenders were examined and all were found to have been undertaken in accordance with centrally issued guidance.
- 15.5 The formal caution was processed in full accordance with the Authority's enforcement policy and relevant Food Safety Act Codes of Practice and official guidance.
- 15.6 The Authority had a number of shellfish beds within its area for which movement documents were normally required to allow commercial harvesting. The lack of any such documents over the previous 12 months despite continued use of the beds indicated that the Authority was not fully enforcing the relevant legislation.

Recommendation

- 15.7 The Authority should:

Ensure that it carries out enforcement activities associated with the shellfish beds in accordance with the relevant legislation and centrally issued guidance.
[The Standard – 15.2]

16 Records and Inspection Reports

Food Hygiene

- 16.1 Paper and database records of food premises were retrievable and had been kept for the 6 years required by the Standard.
- 16.2 Records for 10 general premises where food hygiene inspections had been carried out were examined. The records included details of the size and scale of the business, the type of food activity, information on hygiene training and an assessment of the business's hazard analysis compliance. However, in 5 cases the regulations quoted were incorrect or incomplete.
- 16.3 The records for 5 Approved Premises were also examined. A synopsis of premises and activities had been recorded on 4 files. However, details such as the laboratories used by the company, product withdrawal plans pest control arrangements, hygiene training, assessment of HACCP own checks and details of the cleaning programme and chemicals used were regularly missing.
- 16.4 Ten files relating to the licensing of butchers shop premises were examined. File records were comprehensive in nature with a description of the operations at the premises, and details of compliance with training and HACCP requirements.
- 16.5 Either a report of inspection or a follow up letter was issued following each food hygiene inspection, which clearly set out the reason for any works and actions required, indicated appropriate time-scales for action and distinguished between legal requirements and advice.
- 16.6 File records for complaints and infectious diseases were generally not sufficiently comprehensive to serve as an informative record for other enforcement officers.

Food Standards and Feedingstuffs

- 16.7 Paper and database records of food and feedingstuffs premises were retrievable and in general had been kept for the 6 years required by the Standard.
- 16.8 Post Inspection forms were left on the premises following a food standards inspection, and the records of recent inspections examined were generally comprehensive in nature.

16.9 File records relating to feedingstuffs premises were limited with little information recording the activities carried on in the premises. In addition the hard copy records did not match computer records in several instances.

Recommendation

16.10 The Authority should:

Ensure that the detail of records kept on Approved Premises, complaints, infectious disease investigations and feedingstuffs inspections is sufficient to ensure that action taken together with the history of compliance and investigation can be ascertained.

[The Standard – 16.1]

17 Complaints about the Service

- 17.1 The Authority had a corporate complaints procedure that was in full compliance with the requirements of the Standard.
- 17.2 Information about the procedure was available in the reception areas and a leaflet outlining the procedure was available to the public.
- 17.3 The auditors were informed that no complaints had been recorded against the service during the 2 years preceding the audit.

18 Liaison with Other Organisations

18.1 The Authority had liaison arrangements in place with neighbouring authorities and other appropriate bodies aimed at facilitating consistent enforcement. This included active participation in:

- North Wales Food Group.
- Society of Directors of Public Protection Wales Food Safety Technical Panel.
- Welsh Food Microbiological Forum
- North Wales Metrology and Quality Standards Panel.

The minutes of these meetings were retained and confirmed regular attendance by a representative of the Service.

19 Internal Monitoring

- 19.1 The Authority had recently produced a documented internal monitoring procedure covering the food hygiene enforcement service which covered both qualitative and quantitative aspects. The Food and Agricultural Standards Enforcement Policy and Procedures made reference to internal monitoring with regard to food standards and feedingstuffs enforcement. Full implementation of the procedures should ensure elimination of the issues raised during the audit particularly in relation to records.
- 19.2 There was evidence of informal quantitative and qualitative monitoring including the following:
- Monitoring performance through internal and committee reports
 - Team meetings to discuss issues of interpretation
 - Review of correspondence
- 19.3 The Authority had also made use of questionnaires sent to service users asking for their views on the quality of service provided. Evidence was provided of 2 surveys, the first relating to food hygiene and the second to the Trading Standards department which included food standards enforcement. The surveys indicated a generally high level of satisfaction amongst the business community for the food enforcement service provided by the Authority.

19.4 *Recommendation*

The Authority should:

Fully implement its internal monitoring procedures to ensure effective and consistent enforcement and to verify its conformance with all areas of the Standard, legislation and The Authority's own documented policies and procedures.

[The Standard 19.1]

20 Third Party or Peer Review

- 20.1 The Authority had taken part in the Society of Directors of Public Protection Wales Food Safety Technical Panel All Wales inter-Authority audit scheme in 2000. An action plan had been produced by the Authority addressing the issues raised during the audit.

21 Food and Feedingstuffs Safety and Standards Promotion

21.1 Evidence of food safety promotional work being carried out by the Authority included:

- Participation in the Foodlink National Food Safety Week with displays in 4 local supermarkets during 2002.
- Participation in the Welsh Food Hygiene Award Scheme
- A series of presentations on food safety awareness at the local college.

Recommendation

21.2 The Authority should:

Ensure that it expands its promotional activities to include food standards and feedingstuffs. [The Standard – 21.1]

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Food Standards Agency Wales

Glossary

Agricultural Analyst	A person, holding the prescribed qualifications, who is formally appointed by a local authority to analyse feeding stuffs samples.
Approved premises	Food manufacturing premises that has been approved by the local authority, within the context of specific legislation, and issued a unique identification code relevant in national and/or international trade.
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.
Best Value	<p>A Government policy which seeks to improve local government performance in the delivery of services to local communities – from education and care for the elderly through to environmental health and road maintenance. Best Value aims to ensure that the cost and quality of these services are of a level acceptable to local people by:</p> <ul style="list-style-type: none">• increasing the role of local people in deciding the priorities for local government services• improving the way authorities manage and review their business• building on the experience and expertise of staff. <p>* In Wales this has recently been replaced by the Wales Programme for Improvement</p>
Border Inspection Post	Point of entry into the UK from non-EU countries for products of animal origin.
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.
Enforcement Concordat	Government guidance setting out principles and procedures of good enforcement which local authorities may adopt. Developed in consultation with businesses, local and central government,

	consumer groups and other interested parties. It sets out what businesses and others being regulated can expect from enforcement officers.
Environmental Health Officer (EHO)	Officer employed by the local authority to enforce food safety legislation.
Feedingstuffs	Term used in legislation to describe feed mixes for farm animals and pet food.
Food Examiner	A person holding the prescribed qualifications who undertakes microbiological analysis on behalf of the local authority.
Food Hazard Warnings	This is a system operated by the Food Standards Agency to alert the public and local authorities to national or regional problems concerning the safety of food.
Food hygiene	The legal requirements covering the safety and wholesomeness of food.
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"> • Food Law Enforcement Standard • Service Planning Guidance • Monitoring Scheme • Audit Scheme <p>The Standard and the Service Planning Guidance set out the Agency's expectations on the planning and delivery of food law enforcement.</p> <p>The Monitoring Scheme requires local authorities to submit quarterly returns to the Agency on their food enforcement activities i.e. numbers of inspections, samples and prosecutions.</p> <p>Under the Audit Scheme the Food Standards Agency will be conducting audits of the food law enforcement services of local authorities against the criteria set out in the Standard.</p>
Full Time Equivalent (FTE)	A figure which represents that part of an individual officer's time available to a particular role or set of

duties. It reflects the fact that individuals may work part-time, or may have other responsibilities within the organisation not related to food enforcement.

HACCP	Hazard Analysis 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.
Home Authority	An authority where the relevant decision making base of an enterprise is located and which has taken on the responsibility of advising that business on food safety/food standards issues. Acts as the central contact point for other enforcing authorities' enquiries with regard to that company's food related policies and procedures.
Improvement notice	A notice served by an Authorised Officer of the local authority under Section 10 of the Food Safety Act 1990, requiring the proprietor of a food business to carry out suitable works to ensure that the business complies with the requirements of food hygiene or food processing legislation.
Inter Authority Auditing	A system whereby local authorities might audit each others' food law enforcement services against an agreed quality standard.
Member forum	A local authority forum at which Council Members discuss and make decisions on food law enforcement services.
OCD returns	Returns on local food law enforcement activities required to be made to the European Union under the Official Control of Foodstuffs Directive.
Originating Authority	An authority in whose area a business produces or packages goods or services and for which the Authority acts as a central contact point for other enforcing authorities' enquiries in relation to the those products
Risk rating	A system that rates food premises according to risk and determines how frequently those premises

should be inspected. For example, high risk hygiene premises should be inspected at least every 6 months.

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 all the functions are combined, examples being Welsh Authorities and London Boroughs. A Unitary Authority's responsibilities will include food hygiene, food standards and feeding stuffs enforcement.

Action Plan for: Isle of Anglesey County Council

Audit date: 3rd - 5th June 2003

IMPROVEMENTS PLANNED	BY (DATE)	TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	COMMENTS
<p>Food Service Plan to be submitted for Member approval</p> <p>Annual Performance Review to be submitted for Member approval</p>	<p>Completed</p> <p>Completed</p>	<p>3.8 The Authority should:</p> <p>(i) Submit the Service Plan for Member approval [The Standard – 3.1]</p> <p>(ii) Conduct and document an annual performance review based on each year's Service Plan, report the review to the appropriate member forum and address any shortcomings in the service arrangements for the following year. [The Standard – 3.2]</p>	<p>Food Service Plan approved by Executive Members on 27 May 2003</p> <p>Next annual performance review to be carried out by 30 April 2006</p>
<p>Trading Standards Document Control and Review Procedure to be implemented</p> <p>Document Control Systems will be reviewed to ensure that superseded</p>	<p>Completed</p> <p>31/12/05</p>	<p>4.3 The Authority should:</p> <p>(i) Further develop and implement the control system to ensure that all documented policies and procedures relating to food law enforcement are reviewed at regular intervals and whenever there are changes to legislation or centrally issued guidance. [The Standard – 4.1]</p> <p>(ii) Ensure that all documentation relating to its enforcement activity is included within the control system and that any changes to</p>	<p>Trading Standards Document Control System in place since 1 April 2004 and reviewed at regular intervals.</p>

documents are removed from use or clearly marked as superseded.		documentation are appropriately authorised and any superseded documents removed from use or are clearly identified as superseded [The Standard – 4.2]	
<p>Training needs of all staff authorised to carry out food enforcement duties to be reviewed</p> <p>Records of training courses held on corporate HR computerised Personnel Manager system to be reviewed and updated.</p> <p>Records of staff qualifications and training held on corporate HR computerised Personnel Manager system to be reviewed and updated.</p>	<p>31/01/06</p> <p>31/03/06</p> <p>31/03/06</p>	<p>5.8 The Authority should:</p> <p>(i) Ensure that all staff authorised to carry out food enforcement duties receive appropriate training and are suitably experienced. [The Standard – 5.3]</p> <p>(ii) Record the content, objectives, duration and any assessment made of training courses attended by food enforcement staff. [The Standard – 5.4]</p> <p>(iii) Record the relevant academic or other qualifications and training of food enforcement staff. [The Standard – 5.5]</p>	<p>Training Plans, submitted annually to the corporate Human Resources Department, identify the training needs of all staff, including staff authorised to carry out food law enforcement .</p> <p>Training records are held by corporate Human Resources Department on computerised Personnel Manager system. Departments currently being granted access to live system for inputting data and reporting purposes.</p>
Documented procedure for calibration to be reviewed and implemented, in accordance with Code of Practice.	30/09/05	<p>6.4 The Authority should:</p> <p>Review and implement the documented procedure for calibration to ensure that all temperature measuring instruments are calibrated and checked in full accordance with Food Safety Act Code of Practice No</p>	Revised procedure to include details of the acceptable tolerances for the equipment, frequencies of checks, action to be taken where results are outside tolerances and routine checks

		10: Enforcement of the Temperature Control Requirements of Food Hygiene Regulations. [The Standard – 6.2}	made by officers between the manufacturer's calibration checks.
<p>Food Hygiene inspection programme to be reviewed in order to ensure compliance with minimum frequencies in Code of Practice.</p> <p>Procedures in respect of Approved Premises to be reviewed.</p> <p>The Food Hygiene Inspection Procedure to be reviewed and required amendments implemented.</p>	<p>Completed</p> <p>31/03/06</p> <p>31/03/06</p>	<p>7.9 The Authority should:</p> <p>(i) Ensure that food hygiene inspections are carried out at the minimum frequencies required by Food Safety Code of Practice No 9: Food Hygiene Inspections. [The Standard – 7.1]</p> <p>(ii) Ensure that the approval process and Approved Premises inspections are carried out in full accordance with the relevant legislation and official guidance. This should include a review of existing approvals. [The Standard – 7.2]</p> <p>(iii) Revise the existing documented inspection procedure to make more specific reference to Approved Premises and include butchers licensing inspections. [The Standard – 7.5]</p>	<p>Inspection programme achieved 100% of Category ABC inspections due during 2004/05.</p> <p>Planning additional visits to approved premises, as directed by Code of Practice.</p> <p>New Code of Practice issued since Audit.</p> <p>Butchers licensing may be stopped around January 2006. Documentation needs revision to highlight new legislation due in January.</p>
Revenue bid for additional staffing resources to be submitted as part of 2006-07 revenue budget setting	01/12/05	<p>7.15 The Authority should:</p> <p>Ensure that food standards inspections are carried out at the minimum frequencies required by Food Safety Code of Practice</p>	Revenue bids for additional Trading Standards staffing resources in order to improve food standards inspection levels were submitted during the 2004-

round.		No 8: Food Standards Inspections. [The Standard – 7.1]	05 and 2005-06 annual revenue budget setting rounds but were unsuccessful.
Environmental Health Food Complaints Procedure to be amended and improvements implemented.	Completed	8.5The Authority should: Ensure appropriate action is taken on complaints received in accordance with the centrally issued guidance and the Authority's own procedures. [The Standard – 8.2]	Letter sent to complainant on completion of investigation, to advise of action taken and outcome of investigation. Food Complaint form amended to include completion date and details of contact with complainant.
Advice to Businesses to be expanded to include feedingstuffs.	Completed	10.3The Authority should: Expand its advice to businesses to include feedingstuffs. [The Standard – 10.1]	Business Advice packages completed 1 April 2004 and now include advice to sellers of feedingstuffs.
Environmental Health documented Sampling Policy and Procedure to be amended.	Completed	12.8The Authority should: Take appropriate action in accordance with the enforcement policy when sample results are considered not to be satisfactory. [The Standard – 12.6]	Revised Sampling Policy and Procedure clarifies follow-up action to be taken, including resampling and investigation visits to sampled premises.
Documented procedure to be reviewed, in liaison with local Health Authority.	31/12/05	13.4The Authority should: (i) Ensure that the procedure for the control of outbreaks of food related infectious disease is reviewed in association with the Health Authority and any other relevant organisations and is tested as specified. [The Standard – 13.1]	Health Authority has just issued new guidelines on procedure for gastrointestinal infections.

Documented procedure to be fully implemented.	Completed	(ii) Carry out investigations of sporadic cases in full accordance with the documented procedure for the investigation of notifications of food related infectious disease. [The Standard – 13.2]	Case records now provide full details of all actions taken in the investigation, as per documented procedure.
Enforcement Activities in connection with shellfish beds to be reviewed.	31/03/06	15.7The Authority should: (ii) Ensure that it carries out enforcement activities associated with the shellfish beds in accordance with the relevant legislation and centrally issued guidance. [The Standard – 15.2]	Continuing issues regarding the current legislation relating to shellfish beds and the level of staff resources required to enforce adequately.
Details of Records kept on Approved Premises, complaints, infectious disease investigations and feeding stuffs inspections to be reviewed.	Completed	16.10The Authority should: Ensure that the detail of records kept on Approved Premises, complaints, infectious disease investigations and feeding stuffs inspections is sufficient to ensure that action taken together with the history of compliance and investigation can be ascertained. [The Standard – 16.1]	
Internal Monitoring Procedures to be fully implemented.	Completed	19.4The Authority should: Fully implement its internal monitoring procedures to ensure effective and consistent enforcement and to verify its conformance with all areas of the Standard, legislation and The Authority's own	

		documented policies and procedures [The Standard – 19.1]	
Food Safety promotional activities to be expanded to include food standards and feedingstuffs	Completed	21.2 The Authority should: Ensure that it expands its promotional activities to include food standards and feeding stuffs. [The Standard – 21.1]	Promotional activities expanded on 1 April 2004 to include food standards and feedingstuffs.