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Report on the Food Law Enforcement Service

Pembrokeshire County Council

20 – 23 January 2004

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 the responsibility of unitary authorities. These local authority regulatory functions are principally delivered through their Environmental Health and Trading Standards Services.

The attached audit report examines the local authority's Food Law Enforcement Service. The assessment includes the local arrangements in place for 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 authorities may provide their food enforcement services reflecting local needs and priorities.

Agency audits assess 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 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 contains some statistical data, for example on the number of food premises inspections carried out. The Agency's website contains enforcement activity data for all UK local authorities.

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 Pembrokeshire County Council was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme.

Scope of the Audit

- 1.3 The Authority was audited as part of the Food Standards Agency Wales programme of full audits of all 22 Welsh local authorities
- 1.4 The audit covered Pembrokeshire's food hygiene, food standards and animal feedingstuffs law enforcement service. The on-site element of the audit took place at the Authority's offices at Haverfordwest, between 20 - 23 January 2004.
- 1.5 The audit assessed the Authority'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, (amended March 2002, and June 2003), 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 Pembrokehire County Council is a Welsh Unitary Authority, centred on the County Town of Haverfordwest in south west Wales. It covers an area of 165,000 hectares and has a base population of approximately 116,000, which increases to around 200,000 during summer months when the area plays host to a significant number of tourists. The County Council is the largest employer in the area, having around 6,000 staff.
- 1.7 The area is predominantly rural in character, with livestock farming and the cultivation of potatoes forming important sectors of the local economy. The main centres of population include Milford Haven, Pembroke, Fishguard, St. Davids, Tenby, and Haverfordwest.
- 1.8 Tourism has been a major source of employment and income in Pembrokehire's coastal resorts for the last 150 years or so, supplemented more recently by visitors to the Pembrokehire Coast National Park and surrounding areas. Amongst others such as manufacturing wholesale/retail trade and catering, significant employment is centred on maritime industries such as shipping, fishing, and the ferry routes between West Wales and the Irish Republic.
- 1.9 The Authority's Public Protection Division of the Transportation and Environment Directorate, located at County Hall, Haverfordwest, had responsibility for food and feedingstuffs law enforcement, and for the investigation and control of cases and outbreaks of food poisoning and communicable disease.
- 1.10 At the time of audit the Division was finalising the transfer of food standards and some feedingstuffs enforcement from the Trading Standards Team to the Food, Safety and Port Health Section. Members of the Trading Standards Service's Animal Health Team also carried out enforcement of feedingstuffs legislation.
- 1.11 The Authority's Offices were open to the public from 09.00hrs until 17.00hrs, Monday to Friday, although officers worked flexible hours between 08.00hrs and 18.00hrs, and conducted inspections outside these hours when necessary. A review of out-of-hours working arrangements was underway at the time of audit, although the Authority reported that emergency cover was provided.

- 1.12 The Authority reported the following data in 2002 –2003 relating to its food hygiene, food standards and feedingstuffs inspection and sampling programmes:

Inspection Programme	No. of Premises
Food Hygiene Enforcement	1924
Food Standards Enforcement	1687
Feedingstuffs Enforcement	243

Proactive Enforcement Activity	No. of Actions
Food hygiene inspections	728
Other food hygiene visits	3418
Formal microbiological food samples	65
Food standards inspections	601
Other food standards visits	60
Informal food standards samples	82
Formal food standards samples	99
Feedingstuffs inspections	13
Other feedingstuffs visits	0
Informal feedingstuffs samples	16
Formal feedingstuffs samples	1

2 Executive Summary

- 2.1 The food and feedingstuffs law enforcement service provided by the Authority at the time of the audit was generally satisfactory and there was evidence that an extensive service improvement programme was underway. The auditors were encouraged by evidence of the recent appointments of Senior Officers who had responsibility for managing the service.

The Authority was actively promoting the food safety and standards service and was also providing a range of information to food and feedingstuffs premises in its area.

- 2.2 The management of a modern, effective, and efficient food and feedingstuffs enforcement service is dependent on an accurate and up to date data management and information system. Although the Authority's system appeared to be essentially sound and robust and capable of performing effectively, some deficiencies in data quality and accuracy were identified at the time of audit.

2.3 The Authority's Strengths

Food Manufacturing and Approved and Registered Feedingstuffs Premises Records

File records and inspection reports for Approved feedingstuffs establishments, and for manufacturing premises in relation to food standards, were comprehensive, detailed, and well maintained, enabling officers to determine the appropriate scope and depth of subsequent inspections and other enforcement activity.

Food Safety and Standards Promotion

A wide range of food promotional activity had been undertaken, which demonstrated the Authority's commitment to a proactive programme of advisory and educational activities that complemented its statutory duties.

Advice to Business

The Authority was actively working with businesses to help them comply with food hygiene, food standards and feedingstuffs legislation. This included the provision of advice, distribution of literature and membership of a local business partnership.

2.4 The Authority's Key Areas for Improvement

Database Accuracy

The audit revealed some deficiencies in the quality and accuracy of historical data in the Food Team's data management and information system. This affected the Authority's ability to accurately plan its inspection programme and report precise performance and monitoring data.

Inspection Frequency

The Authority was not conducting food hygiene and food standards inspections at the minimum frequency required by Food Safety Act Codes of Practice Nos. 8 and 9.

Audit Findings

3 Organisation and Management

3.1 The Authority operated a Cabinet style of local government with a Constitution that set out the Authority's decision-making arrangements. Under the Constitution, decisions on certain specific matters had been delegated to officers.

3.2 Delivery of the food hygiene, food standards and feedingstuffs enforcement service was the responsibility of the Public Protection Division of the Authority's Transportation and Environment Directorate.

3.3 The Authority's corporate planning framework included the Corporate and Improvement Plan, which it produced and reviewed each year as part of the Wales Programme for Improvement.

3.4 The Plan for 2003 - 2004 identified the Authority's five key priorities, which had been developed under its Community Planning and Partnership Initiative to promote the economic, environmental and social well-being of Pembrokeshire and its people. The five priorities for 2003 - 2004 were:

- Developing vibrant communities;
- Improving Pembrokeshire's communication links;
- Delivering economic growth based on local need;
- Encouraging people to reach their potential;
- Promoting a clean, healthy and valued environment.

The fifth of these covered the Authority's food and feedingstuffs law enforcement service.

3.5 The Corporate and Improvement Plan included details of the Authority's performance in previous years, and set performance indicators and targets for 2003 - 2004. The performance indicators used for food and feedingstuffs were:

- Percentage of food premises inspections that should have been carried out, that were carried out for:
 - a) high risk premises;
 - b) other premises;
- Percentage of premises licensed within 28 working days of completed application, including butchers;
- Score against checklists of enforcement best practice for environmental health and for trading standards.

3.6 Of the premises due for inspection in 2002 - 2003 the Authority reported that it carried out 65% of food hygiene inspections of high-risk premises and 50% of inspections of other premises. The Authority's 2003 - 2004 Corporate and Improvement Plan had identified food hygiene inspection performance as an area that needed to improve. It said, "for the previous

2 years, we have inspected every high risk food premises, whereas the Welsh average is 88% for high risk and 67% for other premises. This was excellent performance on a consistent basis. However, last year our performance dropped considerably to 65% and 50% respectively. This was due to a national shortage of qualified officers and the non-availability of suitable contractors. There is currently only one vacant post and this is expected to be filled by August of this year.”

- 3.7 The Authority had drawn up a Food Law Enforcement Service Plan for 2003 - 2004 that generally met the requirements of the Service Planning Guidance in the Framework Agreement on Local Authority Food Law Enforcement. The Service Plan covered food hygiene, food standards, and feedingstuffs enforcement, and had been approved by the Authority’s Cabinet on 23 June 2003.
- 3.8 Staff were aware of the Service Plan and the performance targets that were included in it.
- 3.9 It was noted, however, that due to an arithmetical error the numbers of inspections due to be carried out during the year had been incorrectly calculated. Whilst the Service Delivery Plan indicated that the Authority’s policy on the pre-licensing inspection of butchers’ shops was to inspect in accordance with the risk rating of the premises it was confirmed that this policy had been amended following receipt of centrally issued guidance.
- 3.10 The Authority had not carried out and documented an annual performance review based on its Service Plan for 2002 - 2003, and had not therefore submitted a review for appropriate Member approval, as required by The Standard.
- 3.11 One purpose of the performance review is to highlight areas of the Service Plan that have not been achieved during the year, to bring these to the attention of Members, and to ensure they are addressed in the subsequent year’s service arrangements. If a performance review is not conducted, documented, and brought to the attention of Members, service deficiencies may remain unresolved.
- 3.12 The Public Protection Division’s staffing level for food and feedingstuffs law enforcement activities as detailed in the Authority’s Food Law Enforcement Service Plan for 2003 - 2004 was 11 Full Time Equivalent officers.
- 3.13 At the time of audit, the Authority reported having the equivalent of 10.2 full time officers in post, a shortfall of 0.8 on the establishment.
- 3.14 The Service Plan indicated that the transfer of responsibility for food standards enforcement from the Trading Standards Team to the Food, Safety and Port Health Section had resource implications that the Authority would need to address during 2004 - 2005.

- 3.15 The net financial budget of the food safety enforcement service for 2003 -2004 was £371,000, a net decrease of £9,000 (5.4%) on the budget for the previous year.
- 3.16 The net financial budget of the food standards enforcement service for 2003 - 2004 was £67,000, a net increase of £16,000 (28%) on the budget for the previous year.
- 3.17 The net financial budget of the feedingstuffs enforcement service was not stated.
- 3.18 The Food Safety Enforcement Service was subject to a Best Value Inspectorate report during 1998 - 1999, and was designated a good service. An Improvement Plan had been produced.

Recommendations

- 3.19 The Authority should:
- (i) Conduct and document an annual performance review based on the Service Plan, and submit the review for appropriate Member approval. [The Standard – 3.2]
 - (ii) Address any variances identified by the performance review in the service arrangements for the subsequent year. [The Standard – 3.3]

4 Review and Updating of Documented Policies and Procedure

- 4.1 The Authority had documented its policies and procedures for most of the enforcement activities covered by the Standard however, it had not ensured that they had all been regularly reviewed at appropriate intervals, as specified in its documented procedure. The Authority reported that some delay in reviewing procedures had been necessary to enable the Authority to focus its efforts on introducing new management procedures in areas that had not been previously been required.
- 4.2 The Authority had set up a comprehensive control system for all documentation relating to its enforcement activities to ensure that:
- Up to date copies of appropriate documentation including legislation and guidance were available at all locations and to all relevant staff;
 - Changes or amendments were covered by the correct authorisation and were carried out without undue delay; and
 - Superseded documents were removed from use.
- 4.3 An audit check revealed that officers had access to current versions of legislation, centrally issued guidance, and other appropriate documentation.
- 4.4 The Authority was preparing for a formal Quality Assurance system, and its documented quality management system was nearing completion at the time of audit.

Recommendation

- 4.5 The Authority should:

Ensure that all documented policies and procedures for the enforcement activities covered by The Standard are regularly reviewed at appropriate intervals, as specified in the documented procedure.
[The Standard – 4.1]

5 Authorised Officers

- 5.1 Section 5 of the Food Safety Act 1990 and Section 67 of the Agriculture Act 1970 require the Authority to appoint sufficient numbers of authorised officers and inspectors respectively. The duty to appoint authorised officers and inspectors falls upon the Authority itself, although it may arrange for its responsibility to be delegated under Section 101 of the Local Government Act 1972.
- 5.2 Section 5 of the Authority's Constitution dated May 2002 included a general delegation to the Authority's Directors to act on behalf of the Authority in relation to any matter that is within the Director's functional portfolio, if the matter had not been reserved to another body.
- 5.3 The Authority had a documented procedure that applied to the authorisation of officers and contractors under the Food Safety Act 1990 and the Agriculture Act 1970. The documented procedure came into effect on 1 December 2003 and was linked to criteria for authorisation to undertake food hygiene, food standards, and feedingstuffs enforcement.
- 5.4 Lead officers had been appointed who had responsibility for the enforcement of food hygiene, food standards and feedingstuffs legislation, and it was verified at audit that these officers had the necessary knowledge, training and qualifications required for such appointment.
- 5.5 Authorisations that had been issued confirmed that officers had been appointed in accordance with their qualifications and experience.
- 5.6 An audit of inspection and other records showed that officers had generally acted in accordance with their authorisations, although an officer who was not authorised had conducted one food standards inspection.
- 5.7 Authorised officers had been issued with letters of appointment in the format specified in the documented procedure which clearly defined the extent of each officer's authorisation to act. It was noted that officers were authorised under the European Communities Act 1972.
- 5.8 The Authority had identified the need for a review of the number of authorised officers that it needed to carry out the work set out in its Service Plan, and was planning to address this during 2004 - 2005.
- 5.9 The Authority had a Corporate Performance Review and Development Scheme that applied to all staff, and a Divisional Training Prioritisation System that formally came into effect on 1 October 2003, although there was evidence that its principles had been in operation for some time. Taken together, the corporate scheme and the divisional system provided for the identification and recording of training needs and training that had been undertaken, including continuing development.

- 5.10 Records of training that had been undertaken were generally well maintained, although it was noted that they did not generally include the course content and objectives, or the duration and assessment of training that had been undertaken.
- 5.11 Records demonstrated the Authority's commitment to training and its positive approach to personal and professional development. The continuing development requirements of Food Safety Act Codes of Practice Nos. 8, 9 and 19 were being met.
- 5.12 The Authority maintained copies of relevant academic and other qualifications and records of training and experience, and was therefore able to demonstrate that the officers the Authority had appointed as authorised officers under the Food Safety Act, including contractors, were appropriately qualified and experienced.

Recommendation

- 5.13 The Authority should:

Ensure that details of the contents, objectives and duration of all training provided to authorised officers is maintained on file together with a record of any assessment made in relation to the training. [The Standard – 5.4]

6 Facilities and Equipment

- 6.1 The Authority had made available the necessary facilities and equipment to permit all activities associated with the service to be carried out.
- 6.2 An Equipment Maintenance and Calibration Procedure had been implemented to ensure that equipment was properly maintained and calibrated, and removed from service when found to be defective.
- 6.3 Equipment had been calibrated in accordance with the procedure, and appropriate records had been kept.
- 6.4 The premises database was considered capable of providing the information required by the Food Standards Agency.
- 6.5 However, the database had not historically been operated in such a way that it was able to generate reliable and accurate information.
- 6.6 System administrators had received training in the use of the integral database reporting facility, and were able to export data for analysis. The Authority received additional support from the software supplier to produce management and performance reports and analyses as required.
- 6.7 Daily backup tapes of the database were taken by the IT Operator, and copies were stored in appropriate off-site facilities.

Recommendation

- 6.8 The Authority should:

Ensure that the database is operated in such a way as to provide information required by the Agency. [The Standard – 6.4]

7 Food and Feedingstuffs Premises Inspections

Food Hygiene

7.1 The Authority's Food Law Enforcement Service Plan for 2003 - 2004 reported that 1941 food businesses in its area were subject to food hygiene inspections. The risk-rating profile and inspection programme included in the Service Plan showed:

Risk Category	Frequency of Inspection	No of Premises	% of Total	Inspections due	Outstanding from previous years	Total no of inspections due 2003-04
A	6 months	41	2	56	22	78
B	12 months	172	9	151	45	196
C	18 months	931	48	465	157	622
D	24 months	201	10	96	43	139
E	36 months	361	19	112	53	165
F	60 months	195	10	52	25	77
Unrated		40	2	33	25	45
Totals		1941		972	357	1322

7.2 . There were some arithmetic errors in the inspection total reported in the service delivery plan

7.3 The Authority had a documented procedure that set out the arrangements for scheduling, planning and conducting programmed food hygiene inspections, and for determining appropriate post-inspection action. The procedure indicated that the Authority would risk rate all premises in accordance with Food Safety Act Code of Practice No. 9, which would be used to determine the frequency of inspection. The Service Plan indicated that, the Authority planned to inspect 100% of high risk premises, 33% of the medium risk and un-rated premises and none of the low risk premises due/outstanding for inspection that year

7.4 A report produced during the audit revealed, however, that food hygiene inspections of 390 food businesses were overdue, of which 185 were in risk categories A to C. Premises identified as operating on a seasonal basis accounted for around 10% of the overdue inspection total.

7.5 A second report produced during the audit showed that 70 businesses without a risk rating had been registered and assigned a next inspection date.

7.6 An examination of 17 inspection histories of food businesses revealed that 5 general premises and 4 Approved Premises had not been inspected at the correct frequency.

7.7 The documented food hygiene inspection procedure included a standard inspection report form, a critical control point assessment, and a risk

assessment sheet that were used by inspectors to record general food hygiene inspections. A standard inspection report form was left with the proprietor at the conclusion of an inspection. These forms included all the information required by Food Safety Act Code of Practice No.9.

- 7.8 The documented procedure did not include specific procedures for the inspection and licensing of butchers' shops or the inspection and approval of premises subject to product-specific food hygiene regulations.
- 7.9 A draft butchers shop licensing procedure and inspection record form was produced at the time of audit, which accorded with centrally issued guidance.
- 7.10 An examination of 9 files relating to licensed butchers' shops revealed that although records were generally comprehensive and well-maintained, and letters detailing minor contraventions of the general food hygiene regulations had been sent out with licences in a number of cases. However, copies of licences were not on file in 2 cases,
- 7.11 A list of butchers' shops that was provided by the Authority indicated that at the time the list was generated from the database, 8 premises had not been inspected at the correct frequency.
- 7.12 Inspections had been conducted by officers in accordance with their levels of authorisation.
- 7.13 Inspection notes and other inspection data that had been recorded by officers at the time of inspection were generally legible and retrievable.

Recommendations

- 7.14 The Authority should:
- (i) Ensure that food hygiene inspections are undertaken at the relevant frequency, as determined by the appropriate risk rating.
[The Standard – 7.1]
 - (ii) Review and implement the policy and procedure relating to butchers' shops to ensure that premises are licensed in accordance with Food Safety Act Codes of Practice and centrally issued guidance.
[The Standard – 7.2]
 - (iii) Set up, maintain and implement a documented inspection procedure for establishments subject to product-specific food hygiene legislation.
[The Standard – 7.4]

Food Standards

- 7.15 The Authority's Food Law Enforcement Service Plan for 2003 - 2004 reported that 1596 food businesses in its area were subject to food standards inspections. The risk-rating profile and inspection programme included in the Service Plan showed:

Risk Category	Frequency of Inspection	No of Premises	No. of Inspections	Outstanding from previous years	Total No of Inspections due 2003/04
High	12 months	14	14	0	14
Medium	24 months	1017	391	126	517
Low	60 months	565	43	305	348
Total premises		1596	448	431	879

- 7.16 The Authority had a documented procedure that set out the arrangements for scheduling, planning and carrying out programmed food standards inspections, and for determining appropriate post-inspection action. The procedure indicated that the Authority would risk rate all premises in accordance with Food Safety Act Code of Practice No. 8 which would be used to determine the frequency of inspection. The service Plan indicated that, the Authority planned to inspect 100% of high and medium risk premises no low risk premises were to be targeted for inspection that year
- 7.17 A report produced during the audit revealed, however, that food standards inspections of 345 food businesses were overdue, of which 1 had been categorised as high risk and 125 medium risk.

- 7.18 An examination of 10 inspection histories of food businesses revealed that 5 premises had been inspected at the correct frequency. In the case of 2 of the businesses there was insufficient data recorded to determine whether inspections had been conducted at the correct frequency and 3 of the premises were not inspected at the correct frequency.
- 7.19 The documented food standards inspection procedure included food standards audit form that contained all the information required by Food Safety Act Code of Practice No.8.
- 7.20 Inspection notes and other inspection data that had been recorded by officers at the time of inspection were generally legible and retrievable.

Recommendation

- 7.21 The Authority should:
Ensure that food standards inspections are undertaken at the relevant frequency, as determined by the appropriate risk rating.
[The Standard – 7.1]

Feedingstuffs

- 7.22 The Service Plan for 2003 - 2004 indicated that 296 premises in the Authority's area were subject to programmed feedingstuffs inspections and that 71 were programmed for inspection during the year.
- 7.23 The Authority had approved 9 establishments and registered 287 premises under the Feedingstuffs (Establishments and Intermediaries) Regulations 1999.
- 7.24 The Authority had a documented procedure that set out the arrangements for scheduling, planning and conducting programmed inspections of feedingstuffs premises, and for determining appropriate post-inspection action. The procedure indicated that inspections of feedingstuffs premises would be carried out at a frequency relative to risk, with registered mixers being inspected every 5 years, and Approved establishments and other premises every 2 years.
- 7.25 A report produced during the audit revealed, however, that 40 inspections of feedingstuffs premises were overdue, having regard to the Authority's feedingstuffs premises inspection frequency criteria.
- 7.26 The documented feedingstuffs premises inspection procedure included a feedingstuffs inspection form that covered all the information necessary to determine compliance with appropriate approval or registration conditions of the Regulations and Directive 95/69/EC.

8 Food, Feedingstuffs and Food Premises Complaints

- 8.1 The Authority had set up two documented policies and procedures that applied to food hygiene complaints, food standards and feedingstuffs complaints. Complaints about food premises were included in a separate generic policy and procedure relating to service requests.
- 8.2 The documented procedures relating to food hygiene complaints and service requests had not been reviewed or updated since October 2001 and did not completely reflect current practice at the time of audit.
- 8.3 The records of 5 food hygiene complaints, 5 food standards complaints, and 2 complaints about food premises were examined. Records generally indicated that thorough investigations had been undertaken and appropriate action taken in accordance with the enforcement policy and within relevant time scales, although the relevant documented procedure had not been completely followed in 2 cases.
- 8.4 There had been no recent complaints relating to feedingstuffs at the time of audit.

Recommendations

- 8.5 The Authority should:
- (i) Review and update the documented policies and procedures for dealing with food hygiene complaints and service requests. [The Standard – 8.1]
 - (ii) Ensure that documented procedures are fully implemented and followed by all officers when conducting investigations into food complaints and complaints about food premises. [The Standard – 8.2]

9 Home Authority Principle

- 9.1 The Food Law Enforcement Service Plan recorded the Authority's support for and, adoption of, the Home Authority Principle. A number of documented policies and procedures confirmed that contact with home and originating authorities was an integral part of the Authority's enforcement process.
- 9.2 The Authority's Public Protection Committee had formally endorsed the Authority's support for the Home Authority Principle at its meeting on 25 April 1996, and had also clearly set out the extent of the assistance that the Authority would provide to other home, enforcing and originating authorities.
- 9.3 The Food Law Enforcement Service Plan stated that Authority acted as home or originating authority for 42 businesses that operated within its area, and it was ascertained at audit that these home authority relationships were primarily for food standards matters. The Authority did not have any formal home authority agreements.
- 9.4 A report provided at the time of audit listed 33 businesses for which the Authority acted as Home/Originating Authority. 18 of these premises had been registered on the LACORS home authority database although it was noted that some of the information was in need of review.
- 9.5 Officers had Internet access to the LACORS Home Authority database, and had worked through the online tutorial in its use to enable correct identification of relevant Home and Originating Authorities and local authority contacts.
- 9.6 Records that were examined at audit demonstrated that the Authority generally implemented the Home Authority Principle effectively, and responded appropriately to requests for information from other authorities.
- 9.7 It was noted, however, that on one occasion Home or Originating Authorities were not always made aware of unsatisfactory food hygiene sample results relating to businesses for which they had responsibilities under the Home Authority Principle.

Recommendation

- 9.8 The Authority should:

Ensure that unsatisfactory sample results are communicated to Home and Originating Authorities. [The Standard - 9.5]

10 Advice to Business

10.1 The Authority demonstrated an active and positive approach to helping local businesses comply with the law, demonstrated by a number of initiatives that had been, or were being undertaken. These included:

- Promoting food hygiene training through the Training Co-ordinator's membership of the Pembrokeshire Hygiene Training Forum;
- Providing advice on feedingstuffs approvals and registrations;
- Running a range of food hygiene training courses including CIEH Level 1, Level 3 and Level 1 Update courses;
- Providing business advice leaflets on food labelling and quality standards;
- Membership of the Local Business Partnership;
- Provision of Essential HACCP Practice training courses;
- Provision of advice to new businesses.

10.2 There was evidence that advice was routinely given on request and during the course of inspections.

11 Food and Feedingstuffs Premises Database

- 11.1 The Authority had set up an electronic data management and Information system for the Public Protection Division that held details of food premises and the feedingstuffs premises in its area.
- 11.2 At the time of audit the Authority had not set up a documented procedure to ensure that its food and feedingstuffs premises database was accurate and up to date and that reasonable security measures were in place to prevent access and corruption by unauthorised persons. It was reported, however, that a documented procedure was in the early stages of preparation at the time of audit.
- 11.3 The system administrator had produced a series of user-friendly and very informative database instruction notes covering various aspects of the system including creating, closing and merging premises records, changing ownership, checking food premises registrations, and producing visit lists. Standard data input sheets had also been developed for premises details and service requests, and were in the process of development for other parts of the system.
- 11.4 However, during the audit, some inaccuracies in the operation of the database and in the recording of data were identified.
- 11.5 The auditors recognised that the Authority had begun to address the challenge of rectifying historical problems with the operation of the database at the time of audit and had made considerable progress. However, the absence of a documented procedure, and the inaccuracies that still remained, cast doubt on the ability of the database to provide accurate monitoring or performance data to the Authority or to the Food Standards Agency, or to produce accurate inspection programmes.
- 11.6 The System Administrator had responsibility for creating database user accounts and passwords, and setting users' security levels, and these systems were in place.
- 11.7 During the course of the audit, 10 food premises in the Authority's area were selected at random from a local business directory. All had been entered onto the database and included in the inspection programme.

Recommendation

- 11.8 The Authority should:

Set up, maintain, and implement a documented procedure to ensure that its food and feedingstuffs premises database is accurate and up to date and that reasonable security measures are in place to prevent access and amendment by unauthorised persons.

[The Standard – 11.2]

Food and Feedingstuffs Inspection and Sampling

- 12.1 The Authority had a documented procedure for the voluntary surrender of food, although this was in need of amendment to ensure compliance with Food Safety Act Code of Practice No.4.
- 12.2 The Authority had a documented sampling policy and procedure for food hygiene, food standards and feedingstuffs sampling, and an annual programme for each. The Authority also had programmes to monitor locally harvested shellfish for algal toxins, and for classifying shellfish beds for commercial harvesting.
- 12.3 There was evidence of a range of sampling activity targeted at a variety of locally produced and manufactured products and active participation in co-ordinated regional and national surveys.
- 12.4 A report produced by the Authority as part of the pre-audit documentation listed a total of 239 food safety and standards samples that had been taken in the first six months of 2003 - 2004.
- 12.5 Laboratories used by the Authority for the examination and analysis of food and feedingstuffs samples had been properly accredited and were on the list of Official Laboratories that the UK had notified to the European Commission.
- 12.6 The Authority's Public Protection Committee had resolved to appoint its Public and Agricultural Analysts in January 1996. The appointments were updated in November 1996 and March 2002.

Food Hygiene

- 12.7 The Service Plan indicated that the Authority planned to undertake three microbiological food safety surveys during 2003 - 2004. These were:
- Establishments subject to product-specific hygiene regulations (116 samples);
 - Welsh Shopping Basket Survey (312 samples);
 - NPHS/FSA Welsh Chicken Survey (40 samples).
- 12.8 The number of samples taken was on target, and those that had been taken generally correlated with the planned food safety sampling programme.
- 12.9 The documented food sampling procedure was dated October 2001 and was overdue for review and update.
- 12.10 Records of nine food hygiene samples were examined, all of which had been taken by officers with appropriate authorisation. The results of all nine samples had been recorded as "unsatisfactory".

12.11 It was not always possible to determine, from the information on the property file, whether appropriate action in accordance with the Authority's documented procedure had been taken to follow-up the unsatisfactory results.

Food Standards

12.12 The Service Plan indicated that the Authority planned to undertake six food standards surveys during 2003 - 2004. These were:

- Spirit drinks from hotels and restaurants (50 samples);
- Products from local manufacturers etc. (121 samples);
- Fish roe for heavy metal contamination (4 samples);
- Products described as "gluten free (6 samples);
- Liqueur chocolates to check liqueur content (5 samples);
- Minced meat to determine species and fat content (8 samples).

12.13 At the time of the audit the number of samples was on target, and those that had been taken generally correlated with the planned food standards sampling programme.

12.14 Records of three food standards samples were examined. The results of two samples had been recorded as "unsatisfactory".

12.15 In some cases it was not possible to determine, from the information on file, whether appropriate action in accordance with the Authority's documented procedure had been taken to follow-up the unsatisfactory results.

12.16 The Service Plan indicated that the Authority planned to take 24 feedingstuffs samples in 2003 - 2004, and some samples had been taken.

Recommendations

12.17 The Authority should:

- (i) Ensure that appropriate action is taken on any non-compliance found in relation to food in accordance with the enforcement policy.
[The Standard – 12.2]
- (ii) Review and implement the food sampling procedure.
[The Standard – 12.4]

13 Control and Investigation of Outbreaks and Food Related Infectious Disease

- 13.1 In September 1999 the Authority, in association with other relevant bodies, had jointly agreed a documented plan for Handling Outbreaks of Food Poisoning and Other Related Diseases (the OCP) that was based on a model drawn up by a joint working group in 1999. The working group comprised the Directors of Public Protection Wales, the all-Wales Consultants in Communicable Disease Control Group, the Public Health Laboratory Service Wales, and other relevant organisations.
- 13.2 The OCP noted that it was a requirement of Welsh Health Circular WHC(90)64 for such plans to be reviewed annually and amended if necessary. The last documented amendments to the OCP were dated January 2000, although it had been reprinted in June 2003. The OCP contained information that had been out-of-date for some time at the time of the audit and necessary amendments had not been made.
- 13.3 It was noted that the Authority was awaiting a revised model plan for Wales that was being drafted by the Communicable Disease Technical Panel before it proceeded with the revision of its OCP.
- 13.4 The Authority had also established a protocol for dealing with outbreaks of viral gastro-enteritis, and used the procedure for the investigation and control of incidents involving Cryptosporidium in water supplies in Wales that was developed by the Cryptosporidium Working Group.
- 13.5 There had been one outbreak of food related infection in the 2 years prior to the audit. Although no outbreak control team was convened, there was nonetheless evidence of close liaison between investigating officers and the Authority's Proper Officer, and that a comprehensive investigation had been conducted, broadly in accordance with the OCP.
- 13.6 An outbreak control team had been convened in April 2003 to deal with an outbreak of non-food-related Cryptosporidiosis. Records showed that an extensive investigation had taken place, with close co-operation with a neighbouring authority and other relevant bodies.
- 13.7 In October 2001 the Authority had set up a documented procedure for dealing with sporadic cases of infectious disease that included standard forms for recording information during the course of an investigation. Standard letters and questionnaires for cases and contacts were the same as those in the OCP.
- 13.8 Officers were not consistently implementing the documented procedure for the investigation of sporadic cases of food-related infection.
- 13.9 Records of 12 notifications of sporadic cases were examined. As a result of recording inaccuracies in 9 cases it was not possible to ascertain

whether an appropriate investigation had taken place in accordance with the Authority's documented procedure.

13.10 Notifications were received predominantly by telephone whilst local difficulties with the COSURV network were being addressed.

13.11 Records were being retained for 6 years.

Recommendations

13.12 The Authority should:

- (i) Ensure that the OCP is reviewed annually in association with the other stakeholders. [The Standard – 13.1]
- (ii) Ensure that the procedure for dealing with sporadic cases of food-related infections is fully implemented by officers when conducting investigations. [The Standard – 13.2]

14 Food Safety Incidents

- 14.1 The Authority had a documented procedure for Food Incidents and Hazard Warnings that included arrangements for responding to Food Hazard Warnings issued by the Food Standards Agency.
- 14.2 The procedure met the requirements of Food Safety Act Code of Practice No. 16 in relation to the Food Hazard Warning System. It included arrangements for dealing with incidents that occurred outside the Department's normal working hours, and for alerting the Agency where an actual or potential food hazard was identified locally.
- 14.3 The Authority had a computer system that was capable of receiving Food Hazard Warnings, and Food Hazard Warnings were e-mailed direct to all relevant officers to ensure they were received and acted upon without delay. The Principal and Senior Officers had also received to the Agency's text messaging service to ensure out of hours cover.
- 14.4 An examination of the Authority's records of Food Hazard Warnings issued in the 18 months prior to the audit revealed that in general, all had been promptly and appropriately actioned in accordance with Food Standards Agency advice. Responses had been documented and included press notices, mail shots and visits to premises.

15 Enforcement

- 15.1 The Authority had adopted the principles of the enforcement concordat and set up documented enforcement policies relating to food safety, and food quality and agricultural standards that were based on the guiding principles of consistency, fairness, proportionality, transparency and openness.
- 15.2 The Authority's Public Protection Committee had approved revised and updated versions of the enforcement policies in April 2001. A generic summary was available in leaflet format from civic buildings and on the Authority's website.

Food Hygiene and Standards

General

- 15.3 The Authority reported that it had undertaken the following enforcement action in the 2 years preceding the audit:
- 1 Prosecution;
 - 2 Formal Cautions;
 - 1 Emergency Prohibition Notice;
 - 27 Improvement Notices relating to 20 premises;
 - 5 Voluntary Surrenders of food.

Food Hygiene

- 15.4 Records relating to 1 Prosecution, 2 Formal Cautions, 1 Emergency Prohibition Notice, 8 Improvement Notices and 5 Voluntary Surrenders of food, were examined and checked against official guidance, the enforcement policy, and relevant procedures.
- 15.5 It was apparent that a wide range of enforcement options were routinely used within the Authority and that enforcement decisions had generally been taken in accordance with the enforcement policy and official guidance, and that appropriate action had been taken where contraventions had been identified.
- 15.6 Some departures from the Authority's enforcement policy and its documented procedures that formed part of the policy were identified, the reasons for which had not been documented.
- 15.7 The audit also revealed that 3 of the 8 Improvement Notices that the Authority had recorded as having been served had not in fact been served, that there was no evidence of proper service in one case, and that there was no timely check on compliance in one other case.
- 15.8 Records of the prosecution that had recently been undertaken at the time of audit by the Senior Trading Standards Officer were extremely

comprehensive and well prepared. They demonstrated that the evidential and public interest tests had been considered, that PACE and PACE Code requirements had been met, and that RIPA procedures had been followed and documented.

- 15.9 An audit of the two Formal Cautions that had been issued also demonstrated that they had generally been undertaken in accordance with the Authority's procedure and were extremely well prepared, documented, and actioned. However, in relation to the second formal caution the file records did not indicate an explanation for an apparent time lapse of some 10 months between commission of the offence and reference of the matter to the Authority's legal department, nor the legal advice concerning the parties by whom the caution should be signed.
- 15.10 Five voluntary surrenders of food that had been reported by the Authority were audited. One was described on file as a "voluntary detention" and involved product from an establishment in the Authority's area that had been sampled and the result suggested potentially pathogenic contamination. The procedure that had been followed was effective, but did not appear to feature anywhere in the Authority's documented procedures, nor in any centrally issued guidance. A similar "voluntary detention" procedure had been adopted in another voluntary surrender case before the food in question was formally surrendered to the Authority for destruction.
- 15.11 Voluntary surrender certificates were in the format specified by the Authority's documented procedure, although three did not show the place, time or method of destruction, or that the Authority's costs had been calculated and recovered from the owner of the food, as specified in the documented procedure.
- 15.12 The Emergency Prohibition Notice that had been served was complied with before the application for an Emergency Prohibition Order could be heard. The Authority followed the correct procedure and was granted a declaration by the Magistrates' that the notice had been served correctly. Records relating to service of the notice, application to the Court, and subsequent withdrawal of the notice were comprehensive and well prepared and presented. The documented procedure did not encompass this particular scenario and the Authority may therefore find it useful to include it at the next document review.

Feedingstuffs

- 15.13 There had been no formal enforcement actions in relation to feedingstuffs law enforcement in the 2 years preceding the audit.

Recommendations

15.14 The Authority should:

- (i) Ensure that food law enforcement is carried out in full accordance with the relevant Food Safety Act Codes of Practice and centrally issued guidance. [The Standard – 15.2]
- (ii) Ensure that all decisions on enforcement action are made following consideration of the enforcement policy and the documented procedures that are part of the policy and that any departures from it are identified and the reasons documented. [The Standard – 15.3]

16 Records and Inspection Reports

- 16.1 Records of premises where the Authority had food and feedingstuffs law enforcement responsibilities were maintained in the Public Protection Division's computerised data management and information system. Property address records were created within the Division and were not linked to a BS7666 compliant land and property gazetteer. It was therefore not possible to verify whether they were accurate.
- 16.2 Records of inspections were maintained in hard copy files that were kept in the Authority's off-site storage facility and in summary format in the divisional data management and information system.
- 16.3 Records relating to premises that had been used as food or feedingstuffs businesses for at least 6 years had generally been kept for that period.

Food Hygiene

- 16.4 Food hygiene inspection records of premises that were subject to the general food hygiene regulations, including licensed butchers, were comprehensive and well maintained, and copies of inspection reports, application forms, and butcher shop licences were on file.
- 16.5 Premises records included a business profile, a description of the activities undertaken, inspection and visit dates and outcomes, risk ratings, critical control point assessments, assessments of compliance with legal requirements, enforcement action, complaints against the business, and copies of correspondence.
- 16.6 Letters generally reflected the requirements of Food Safety Act Codes of Practice and centrally issued guidance, and had been sent in a timely manner in accordance with the Authority's procedure.
- 16.7 Records of premises that were subject to product-specific food hygiene regulations were less well maintained, and there were significant gaps in the information that had been recorded in some cases. The following were missing from one or more premises records:
- Pre-approval inspection report;
 - Approval document;
 - Risk-rating;
 - Post-inspection report;
 - HACCP compliance assessment.
- 16.8 The auditors did note that significant improvements were being made in the quality and quantity of information that the Authority held on approved establishments. This included the use of inspection aide-memoires, and a content checklist in each file to ensure that missing information was gathered and recorded at the next inspection.

- 16.9 A small number of sample records that were examined were incomplete, and failed to demonstrate that the Authority had communicated with businesses sufficiently, or followed-up sample results adequately.

Food Standards

- 16.10 Food standards inspection records of manufacturing premises were recorded on Food Standards Audit Forms, which met the requirements of Food Safety Act Code of Practice No.8. These records were comprehensive and well maintained.
- 16.11 Records included the business profile, a description of the activities undertaken, inspection and visit dates and outcomes, an assessment of compliance with legal requirements, complaints against the business, sample details and results, and copies of correspondence.
- 16.12 Food standards inspection records of non-manufacturers were less well maintained. Food Standards Audit Forms had not generally been completed for inspections of non-manufacturers, and gaps in the information that had been recorded resulted in a failure to meet the requirements of Food Safety Act Code of Practice No.8.

Feedingstuffs

- 16.13 Records relating to establishments that had been approved under feedingstuffs regulations were comprehensive and well maintained. Inspections had been recorded on a standard inspection form that included all the information required to determine compliance with the relevant requirements of the regulations and Directive 95/69/EC.
- 16.14 Records relating to premises that had been registered under feedingstuffs regulations were generally less comprehensive and less well maintained.

Recommendations

16.15 The Authority should:

- (i) Ensure that premises records are accurate and up to date.
[The Standard – 16.1]
- (ii) Ensure that premises records include reports of all inspections and visits, assessments of compliance with legal requirements, risk-rating assessments, results of samples and details of follow-up, details of complaints, informal and formal action, copies of applications and decisions relating to registration, approval and licensing, and copies of all notices, certificates and correspondence. [The Standard – 16.1]

17 Complaints about the Service

- 17.1 The Standard requires the Authority to “set up, maintain, implement and make readily available to the public and the food and feedingstuffs businesses in its area, a documented complaints procedure regarding complaints about the service”.
- 17.2 The Authority had set up and implemented a Corporate Complaints Procedure that included the Authority’s definition of “complaint”, which in turn defined its scope. The definition excluded “a disagreement with the Council’s policies or application of enforcement regulations”, and these were therefore outside the scope of the corporate complaints procedure.
- 17.3 A summary of the corporate procedure, entitled “Complaints, Compliments and Suggestions” had been published and was available from Civic Buildings in hard copy format and on the Authority’s Internet web site. A full copy of the procedure was available on the web site.
- 17.4 There had been one complaint against the food enforcement service in the 2 years prior to the audit, but as it had concerned a disagreement about the application of enforcement regulations, it was outside the scope of the corporate procedure. It had, nonetheless, received an appropriate investigation and response in line with the corporate procedure.

18 Liaison with Other Organisations

- 18.1 The Authority had effective liaison arrangements in place with neighbouring authorities and other appropriate bodies aimed at facilitating consistent enforcement. These included active participation in the following:
- South West Wales Food Safety Task Group;
 - South West Wales Food Safety Technical Panel;
 - Food and Agriculture Standards Group for Wales
 - South West Wales Communicable Disease Technical Panel;
 - South West Wales Communicable Disease Task Group;
 - West Wales Food and Agriculture Panel;
 - West Wales Food Standards Sampling Co-ordinating Group;
 - Port Health Technical Panel;
 - Association of Port Health Authorities;
 - Food Standards Agency Waste Food Task Force;
 - Food Standards Agency/Local Authority Working Group;
 - Local Shellfish Liaison Committee.
- 18.2 Minutes of liaison group meetings were available and confirmed regular attendance by appropriate Service representatives.
- 18.3 The Authority also had active liaison arrangements with:
- Pembrokeshire Food Safety Trainers' Forum;
 - Pembrokeshire Food and Health Group;
 - Other departments within the Authority;
 - The Health Authority and successor bodies;
 - Local colleges and other training providers;
 - LACORS;
 - DEFRA;
 - CEFAS.
- 18.4 The Authority's commitment to sharing expertise and supporting Food Standards Agency initiatives, demonstrated by the nomination of one of its officers to serve on the Agency's Waste Food Task Force, was particularly noteworthy.

19 Internal Monitoring

- 19.1 The Authority had set up a documented internal monitoring procedure in accordance with relevant Food Safety Act Codes of Practice and centrally issued guidance. Although the procedure was introduced in March 2003, implementation was delayed until September 2003.
- 19.2 The procedure applied to inspections, complaints, statutory notifications and service requests dealt with by the Food, Safety and Port Health Section, and applied equally to employees and contractors. It covered:
- Quarterly performance assessment;
 - Computer record review;
 - Document review;
 - Accompanied visits;
 - Team meetings.
- 19.3 The Authority also held Investors' in People accreditation and had developed a corporate performance and appraisal system that applied to all staff employed by the Authority. The corporate system included a training-needs assessment.
- 19.4 One quarterly performance assessment was conducted under the corporate system and the remainder under the divisional system.
- 19.5 Evidence was provided that the corporate system had been implemented, and records showed that performance reviews and personal appraisals had been undertaken and documented, and training needs identified and considered.
- 19.6 Evidence was also provided that implementation of the divisional system was underway and that the first round of performance assessments and document reviews had been completed at the time of audit.
- 19.7 Accompanied visits had also started, and were normally undertaken as and when the opportunity arose, such as during the evening or at weekends when officers worked in pairs for personal safety reasons.
- 19.8 Team meetings took place every 4 - 8 weeks, and minutes showed that staff were briefed on corporate and divisional information and performance, and had the opportunity to discuss monitoring information and other relevant issues.
- 19.9 It was reported that as part of the division's proposed formal Quality Assurance system, the Directorate's Business Unit would have responsibility for auditing the implementation of divisional policies and procedures. It was also reported that documented procedures that had been developed as part of the proposed quality system had been nominated as best practice to the Authority's Best Practice Working Group.

20 Third Party or Peer Review

- 20.1 The Authority had participated in the all-Wales food hygiene inter-authority document review and compliance audit in November 1999.
- 20.2 A Food Safety Enforcement Service Best Value Review also took place during 1999. An Improvement Plan was subsequently developed to address the findings of the Best Value Review. Substantial progress was reported to have been made at the time of audit with the remaining items either in the process of implementation or scheduled for action in the project management framework.
- 20.3 The Authority had also participated in a European Commission Food and Veterinary Office Mission to the UK that looked at the UK Government's implementation of Community controls on fish and shellfish and their practical operation in the field.
- 20.4 The Authority was planning to participate in an inter-authority audit of food poisoning and communicable disease procedures that was due to take place later in 2004.

21 Food and Feedingstuffs Safety and Standards Promotion

- 21.1 The Authority demonstrated a positive commitment to food safety and standards promotion.
- 21.2 The Public Protection Division had initiated or participated in a wide range of promotional activities and had plans for further work in this area. Activities included:
- School Health Week;
 - National Food Safety Week;
 - Crucial Crew;
 - Womens' Health Day;
 - Heartbeat Wales Award for Schools;
 - Welsh Food Hygiene Award Scheme;
 - School Breakfast Clubs and Fruit Tuck Shops;
 - Spade to Fork event;
 - Food handler food hygiene training.
- 21.3 The Division also had an active policy of issuing regular press releases on a wide range of food safety and nutrition issues that had been taken-up and published by the local and regional press.

Recommendation

- 21.4 The Authority should:
- Expand its promotional activity to include feedingstuffs.
[The Standard – 21.1]

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ANNEX A

Glossary

Agricultural Analyst	A person holding the prescribed qualifications, who is formally appointed by a local authority to analyse feedingstuffs 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.
Port Health Authority	A local authority within whose boundaries there is a point of entry into the UK for imported foods.
Public Analyst	An officer, holding the prescribed qualifications, who is formally appointed by the local authority to carry out chemical analysis of food samples.
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 feedingstuffs legislation.

Trading Standards
Officer (TSO)

Officer employed by the local authority who, amongst other responsibilities, may enforce food standards and feedingstuffs 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 feedingstuffs enforcement.