



FOOD
STANDARDS
AGENCY

WALES

ASiantaeth
Safonau
Bwyd

CYMRU

Report on the Food Law Enforcement Service

The City and County of Swansea

25 - 29 October 2004

Foreword

Audits of local authority food law enforcement services are part of the Food Standards Agency's arrangements to improve consumer protection and confidence in relation to food. These arrangements recognise that the enforcement of UK food law relating to food safety, hygiene, composition, labelling, imported food and feedingstuffs is largely the responsibility of local authorities. These local authority regulatory functions are principally delivered through their Environmental Health and Trading Standards Services.

The full audit 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 is acknowledged that there will be considerable diversity in the way and manner in which local authorities may provide their food enforcement services reflecting local needs and priorities.

Agency audits assess local authorities' conformance against "The 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 service for food law enforcement. 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 in the Annex.

CONTENTS

		Page
1	Introduction	4
	Reason for the Audit	4
	Scope of the Audit	4
	Background	4
2	Executive Summary	7
	Audit Findings	
3	Organisation and Management	9
4	Review and Updating of Documented Policies and Procedures	11
5	Authorised Officers	12
6	Facilities and Equipment	15
7	Food and Feedingstuffs Premises Inspections	16
8	Food, Feedingstuffs and Food Premises Complaints	20
9	Home Authority Principle	22
10	Advice to Business	23
11	Food and Feedingstuffs Premises Database	24
12	Food and Feedingstuffs Inspection and Sampling	26
13	Control and Investigation of Outbreaks and Food Related Infectious Disease	29
14	Food Safety Incidents	31
15	Enforcement	33
16	Records and Inspection Reports	35
17	Complaints About the Service	37
18	Liaison with Other Organisations	38
19	Internal Monitoring	39
20	Third Party or Peer Review	40
21	Food and Feedingstuffs Safety and Standards Promotion	41
	Annex	43
	Glossary	

1 Introduction

- 1.1 This report records the results of the audit under the headings of the Food Standards Agency Food Law Enforcement Standard. It 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 The City and County of Swansea 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 Swansea'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 The Guildhall, Swansea between the 25-29 October 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 July 2004), and forms part of the Agency's Framework Agreement with local authorities.
- 1.6 The Framework Agreement and the audit protocols can be found on the Agency's website.

Background

- 1.7 The City and County of Swansea is a Unitary Authority in south west Wales covering an area of approximately 37.809 hectares including the city of Swansea itself and the surrounding area. The resident population is around 223,000.

- 1.8 The Council Offices are open from 8:30am–5:00pm Monday to Thursday and 8:30am–4:30pm on Friday. The Council operates an informal emergency out of hours service at all other times on a goodwill basis.
- 1.9 Over 2000 food businesses, and 350 feedingstuffs businesses, principally on-farm mixers, are registered with the Authority. Food businesses include retail, manufacturing, catering and processing. Sixteen food businesses are Approved establishments under product-specific food hygiene regulations.
- 1.10 The gathering, processing and packing of shellfish, particularly cockles and mussels, is also a valuable part of the local economy.
- 1.11 Food hygiene law enforcement is the responsibility of the Food and Safety Division, food standards and feedingstuffs law enforcement is the responsibility of the Trading Standards Division, and promotional activities are the responsibility of the Health Promotion Division. All three Divisions are part of the Authority’s Environment Department.
- 1.12 Swansea’s coastal location and city status make it a major centre for tourism, leisure, entertainment, sport and shopping. The extensive coastline forms more than two thirds of the Authority’s boundary, which includes the Gower Peninsula, the UK’s first Area of Outstanding Natural Beauty.
- 1.13 The Authority reported in its Food Service Plan that the profile and inspection programme of food hygiene premises was as follows:

Category	No of premises	Inspections planned 2004 –2005 *
A	14	28
B	130	130
C	1031	712
D	281	167
E	310	41
F	170	20
Unrated/other	49	49
Total	2085	1147

*Inspections planned in accordance with Code of Practice No.9.

- 1.14 The Authority reported in its Food Service Plan that the profile and inspection programme of food standards and feedingstuffs premises was as follows:

Category	No of premises	Inspections planned 2004 –2005
High	20	20
Medium	700	365
Low	Not stated	150
Farms	Not stated	350
Total		885

Resources

- 1.15 The 2004–2005 Service Plan stated that the Authority had the equivalent of 10.65 full time equivalent (FTE) staff involved in food law enforcement, which included Environmental Health and Trading Standards staff. The number of staff involved in feedingstuffs law enforcement was not given. However, information provided by the Authority for the audit listed only 10.2 FTE staff including feedingstuffs, a shortfall, including feedingstuffs, of 0.45 FTE. The Authority had advertised two positions in the Food Safety Team and the recruitment process was underway at the time of the audit.
- 1.16 The Service Plan stated that the Authority had a net budget £739,500 for Trading Standards division, approximately £20,000 of this budget to be spent on the sampling and analysis of food. A net budget of £585,000 had been similarly identified for the Food and Safety division, approximately £4,500 of this being for the sampling and analysis of food.

2 Executive Summary

- 2.1 The Authority was providing a food law enforcement service that worked closely with businesses, to aid their compliance with food safety legislation. Advice had been given during inspections and other visits and through the distribution of a wide range of relevant material. The importance of providing training had been recognised for feed and enforcement officers and they had attended numerous courses on a variety of subjects. The Authority also demonstrated a commitment to food safety promotion and had engaged in a wide array of related activities.
- 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, significant deficiencies in data quality and accuracy were identified at the time of audit. It was recognised that the Authority had already begun to address a number of the problems associated with the operation of the database. The Authority was not carrying out food standards inspections at the minimum frequency required by Food Safety Act Code of Practice No. 8 and there was little evidence that it was carrying out its feedingstuffs responsibilities effectively.

2.3 The Authority's Strengths

Training

Officers were provided with numerous opportunities to participate in training events and it was evident that those who were conducting food hygiene enforcement were meeting the continuing development requirements of Food Safety Act Code of Practice No.19.

Advice to Business

The Authority was actively working with businesses to help them comply with food hygiene and standards legislation. This included distribution of business information in a variety of ways including during routine inspections and thorough targeted campaigns.

Food Safety Promotion

The Authority had demonstrated a commitment to food safety promotion by engaging in a variety of different activities and working closely with local schools.

2.4 **The Authority's Key Areas for Improvement**

Database

The accuracy of the database was a concern of the auditors. Inaccuracies affect the ability of the service to plan an effective work programme, produce comprehensive performance monitoring data and restrict the ability to supply reliable statistics to central government.

Food Standards Inspection Frequency

The Authority was not carrying out its food standards inspections at the minimum frequency required by Code of Practice No.8. Inspections carried out at the minimum frequencies ensure that risks associated with the operation of food businesses are identified in a timely manner.

Feedingstuffs Enforcement

There was little evidence that the Authority was undertaking appropriate feedingstuffs enforcement activity.

Frequency of Premises Inspections

The Authority was not carrying out its premises inspections at the minimum frequencies required by Codes of Practice No.8 and No.9. Inspections carried out at 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 had a Food Law Enforcement Service Plan for 2004 – 2005 covering food hygiene, food standards and feedingstuffs enforcement. The Service Plan identified appropriate links to the Authority's other Plans and Corporate Objectives.
- 3.2 The 2004 – 2005 Food Law Enforcement Service Plan referred to The Council's Corporate Plan for 2004 – 2008 "Better Service – Better Performance" that was approved on the 18th March 2004, and established the Strategic direction and the most important priorities for the Council as a whole.
- 3.3 The Corporate Plan set out the Council's mission, overriding aims and corporate priorities. These were the focus for the Cabinet and Corporate Management Team supported by contributions from the Service Units. The Director of Environment was a member of the Corporate Management Team. The Environment Department was made up of four service delivery units:
- Environmental Health Services (including all food law enforcement);
 - Environmental Management & Protection;
 - Planning Services;
 - Transportation & Engineering.
- 3.4 The 2004 – 2005 Food Law Enforcement Service Plan had been drawn-up broadly in accordance with the Service Planning Guidance in the Framework Agreement, and included premises profiles and details of the inspection programmes for food hygiene, food standards and feedingstuffs.
- 3.5 Areas of the Service Plan that did not meet the requirements of the Framework Agreement included the financial allocation to the service, details of which were incomplete. Whilst the staff resource available was detailed there was no estimate of that necessary to deliver the service.
- 3.6 The full Council had originally approved the 2004 – 2005 Service Plan on 2 October 2003, and the Cabinet Member for Environment had signed-off a review on 23 August 2004 in accordance with the Authority's Constitution.

- 3.7 The review itself had not been documented, and there was no evidence that variances such as the substantial number of overdue food standards inspections had been identified or addressed in the following year's service arrangements.

Recommendations

- 3.8 The Authority should:
- (i) Ensure that the Service Delivery Plan is in full accordance with the Service Planning Guidance in Chapter 1 of the Framework Agreement. [The Standard – 3.1]
 - (ii) Ensure that its performance review is documented. [The Standard – 3.2]
 - (iii) Ensure that all variances in meeting the Service Delivery Plan are addressed in the subsequent year's service arrangements. [The Standard – 3.3]

4 Review and Updating of Documented Policies and Procedures

- 4.1 The Authority had a procedure for controlling documentation, and a quality management system for the Environment and Health Department, which was designed to ensure that documented policies and procedures for enforcement activities covered by The Standard were reviewed and updated as necessary.
- 4.2 The quality management system was externally accredited, and was being reviewed at the time of the audit to meet the requirements of ISO 9002.
- 4.3 As part of the quality management system there was a documented procedure, issued in July 1999, for the control of externally issued documentation.
- 4.4 Documented policies and procedures had been produced for a range of food hygiene, food standards and feedingstuffs enforcement activities covered by The Standard. Some of these were in need of review and updating.
- 4.5 Controlled copies of corporate documents were available to all officers on the corporate Intranet.
- 4.6 Officers had online access to up to date copies of relevant documents, including legislation, Food Safety Act Codes of Practice, Industry Guides, and other appropriate documentation, and also to the LACORS website.

Recommendation

- 4.7 The Authority should:
- Ensure that all documented policies and procedures for each of the enforcement activities covered by The Standard are reviewed.
[The Standard – 4.1]

5 Authorised Officers

- 5.1 Under the Food Safety Act, food authorities may authorise officers to exercise specific functions or to act generally. Under the Authority's delegated powers, senior officers were authorised to exercise specific functions.
- 5.2 The names of officers who had been permitted to exercise powers of entry to premises and to authorise notices, including the inspection seizure and detention of food and the procurement of samples, had been recorded in accordance with the delegated powers.
- 5.3 However, there was no documented procedure for the authorisation of officers under the Food Safety Act, and there was no documented assessment of compliance with the pre-requisites for authorisation set out in the Food Safety Act Code of Practice prior to authorisation being granted.
- 5.4 Officers who were conducting food hygiene inspections had qualifications that were appropriate to the scope of their authorisations, although one officer had carried out food hygiene inspections beyond the scope of their authorisation.
- 5.5 Most officers who were conducting food standards inspections had appropriate qualifications. However, the Authority had not sought confirmation from the Agency as to the equivalence of the food standards qualification of one officer, as required by the Food Safety Act Code of Practice No.19. According to computer records one low risk food standards inspection was carried out by an inappropriately qualified officer.
- 5.6 Officers who were not working in the Food and Safety and Trading Standards Divisions and who did not routinely enforce the Food Safety Act had been authorised under the Act in accordance with departmental policy. There was no evidence that these officers had maintained the minimum 10 hours per year continuing development training required by the Food Safety Act Code of Practice No.19.
- 5.7 The delegated powers did not include the specific authorisation of officers to enforce regulations made under the European Communities Act or the Food and Environment Protection Act, or the power to grant, refuse, or suspend butchers shop licences.
- 5.8 The Authority had appointed appropriate lead officers with responsibility for food safety and feedingstuffs law enforcement. However, there was

no evidence that the lead officer for food standards had received additional training in respect of the audit of quality assurance systems.

- 5.9 The Authority's training scheme had achieved Investors In People accreditation.
- 5.10 An annual Staff Training and Development Plan listing general and specific training and continuing development targets for each officer was drawn up at the beginning of each year. Officers were encouraged to identify training and development opportunities and to undertake continuing development activities in order to meet their targets as set out in the Training Plan.
- 5.11 Personal appraisal, development and training records were generally comprehensive and well maintained, although there was no training programme that ensured officers' training needs, identified through the personal development and appraisal process and set out in the training plan, were fully met.
- 5.12 However, it was evident that officers had been afforded numerous opportunities to satisfy their training needs by attending a wide variety of courses that included requirements and procedures of PACE, CPIA and RIPA, HACCP, illegal slaughter, meat products, dairy and fishery products as well as lead assessor.
- 5.13 Continuing development requirements of officers who were enforcing food law were being met.
- 5.14 Officers who had responsibility for the approval and inspection of establishments under product-specific food hygiene legislation and the inspection and licensing of butchers' shops had received training in HACCP principles and practice.
- 5.15 Most officers who were authorised to conduct inspections of food businesses with a "high" risk-rating for food standards, and food businesses with documented quality assurance systems, had been trained to quality assurance lead assessor level.

Recommendations

5.16 The Authority should:

- (i) Set up, maintain and implement a documented procedure for the authorisation of officers based on their competence and in accordance with the relevant Food Safety Act Code of Practice and any centrally issued guidance. [The Standard – 5.1]
- (ii) Appoint a lead officer for food standards legislation with appropriate specialist knowledge. [The Standard – 5.2]
- (iii) Ensure that the officers it has authorised under the Food Safety Act have suitable qualifications, training and experience consistent with their authorisation and duties and in accordance with the relevant Food Safety Act Code of Practice. [The Standard – 5.3]
- (iv) Set up, maintain and implement a documented training programme to ensure that all authorised officers and appropriate support staff are trained in the technical and administrative aspects of the work in which they are involved. Where training is provided, details of the content and objectives of the course, the duration and any assessment made of that training should be maintained on file. [The Standard – 5.4]
- (v) Maintain records of relevant academic or other qualifications, training and experience of each authorised officer and appropriate support staff in accordance with the relevant Food Safety Act Code of Practice. [The Standard – 5.5].

6 Facilities and Equipment

- 6.1 The Authority had made available the necessary facilities and equipment to permit activities associated with the service to be carried out.
- 6.2 The Calibration Control System Guidelines, updated in October 2003, set out the procedures for maintaining and calibrating equipment, including temperature monitoring and measuring equipment, and removing it from service when found to be defective. However, the frequency of checks, the method(s) of calibration, and acceptable tolerances were not specified.
- 6.3 Items of temperature monitoring equipment that were used for enforcement purposes were identified by unique identification numbers and recorded. Records indicated that calibration checks were being carried out at regular intervals in accordance with the documented procedure.
- 6.4 The Authority's computer software system that was used to record information relating to food and feedingstuffs law enforcement activity was capable of providing information required by the Food Standards Agency.
- 6.5 Security and backup systems were in place to minimise the risk of corruption or loss of information held on the database.

Recommendation

- 6.6 The Authority should:
Ensure that its documented procedure for the maintenance and calibration of equipment includes details of the frequency of checks, the methods of calibration and acceptable tolerances.
[The Standard – 6.2]

7 Food and Feedingstuffs Premises Inspections

- 7.1 The Food Law Enforcement Service Plan for 2004 – 2005 stated that the Authority's food hygiene and food standards planned inspection programmes were to be carried out in accordance with the relevant Food Safety Act Code of Practice.

Food Hygiene

- 7.2 The documented guideline procedure for food hygiene inspections, updated in August 2004, covered general food hygiene inspections, but not the inspection and licensing of butchers' shops or the inspection and approval of premises subject to product-specific food hygiene regulations.
- 7.3 Records relating to ten premises inspected under general hygiene regulations, ten approved and inspected under product-specific food hygiene regulations, and ten licensed butchers' shops were checked. These indicated that inspections of these businesses had been conducted at the correct frequency, as determined by the relevant Food Safety Act Code of Practice food hygiene risk rating.
- 7.4 A report produced from the database during the audit showed that 44 food hygiene inspections from the 2004 - 2005 programme were overdue, including 40 in risk categories A–C. Food hygiene inspections of some premises were therefore not being conducted at the minimum frequency determined by the food hygiene risk rating.
- 7.5 Standard forms had been used to record general food hygiene inspections and risk-rating assessments, helping to ensure that inspections were conducted and recorded systematically, and in accordance with relevant legislation, the Food Safety Act Code of Practice No.9 and other centrally issued guidance. Records in relation to these inspections contained detailed information.
- 7.6 However, since the standard form had been withdrawn from use records of recent food hygiene inspections were found to contain insufficient information to demonstrate that all aspects of an inspection had been considered.
- 7.7 New businesses that had been reported to the authority on registration forms were allocated a notional risk score to ensure that an inspection was carried out. However, of the 58 premises in this category at the time of the audit, a number that had been registered for some considerable period had not been inspected.

- 7.8 Records relating to the ten licensed butchers' shops indicated that two did not meet the HACCP requirements for licensing at the time they were assessed, although the licences were still issued. In another case there was no butchers shop licensing record form on file. Records of the remaining seven contained evidence that an assessment of compliance with the Food Safety (General Food Hygiene) Regulations and the Food Safety (General Food Hygiene) (Butchers' Shops) (Amendment) (Wales) Regulations 2000 had been undertaken and that the decision to grant a licence had been based on an assessment of all relevant criteria.
- 7.9 Records relating to ten establishments approved under product specific regulations generally contained a synopsis, details on HACCP, hygiene training, pest control and cleaning programme. Two of the files did not contain pre-approval inspection reports. All had been inspected under the correct legislation.

Recommendations

- 7.10 The Authority should:
- (i) Ensure that food hygiene inspections are carried out at a frequency that is not less than that determined under the inspection rating system set out in the Food Safety Act Code of Practice No.9 and centrally issued guidance. [The Standard – 7.1]
 - (ii) Licence butchers' shops in accordance with the relevant legislation, Food Safety Act Code of Practice and centrally issued guidance. [The Standard – 7.2]
 - (iii) Set up, maintain and implement documented inspection procedures for the licensing of butchers' shops and approval of product specific premises. [The Standard – 7.4]

Food Standards

- 7.11 The Authority had a documented procedure relating to Trading Standards visits, last updated in July 1999, which included food standards inspections. This required a post inspection report form to be completed for all inspections, and inspection details to be recorded on the database.

- 7.12 The standard post inspection report form was used to summarise the outcome of Trading Standards inspections, including food standards. A copy was left with the trader at the conclusion of the inspection.
- 7.13 Records relating to eleven food standards inspections that had been conducted during the twelve months prior to the audit were examined. These indicated that only seven had been inspected at the minimum frequency as determined by Food Safety Act Code of Practice No.8.
- 7.14 Summary information on food standards inspection activity was available on the database and in files, although more detailed information was recorded in individual officer notebooks. However, this could not easily be accessed by other officers, and was not readily available when planning subsequent inspections.
- 7.15 A report produced from the database during the audit showed that approximately 500 food standards inspections were overdue, including one in the high risk category and 86 medium risk. Food standards inspections of premises were therefore not being conducted at the minimum frequency determined by Food Safety Act Code of Practice No.8 though it was noted that priority was given to high risk premises.
- 7.16 Of the 402 low risk businesses that were overdue for inspection the database report showed that over half had been due for inspection between 1993-1999. Twenty one premises shown on the report as being overdue had not been allocated an inspection date.
- 7.17 The auditors were advised that the Authority was in the process of introducing the new LACORS risk assessment scheme and that the inspection programme was being reviewed. Preparations had been made for an alternative enforcement strategy for low risk businesses in anticipation of the new Food Safety Act Code of Practice.

Recommendations

- 7.18 The Authority should:
- (i) Ensure that, food standards inspections are carried out at a frequency that is not less than that determined under the inspection rating system set out in the Food Safety Act Code of Practice No.8 and centrally issued guidance. [The Standard – 7.1]
 - (ii) Maintain and implement its documented inspection procedure for food standards inspections. [The Standard – 7.4]

Feedingstuffs

- 7.19 There was no documented inspection procedure for feedingstuffs premises inspections.
- 7.20 Although around 350 businesses, mainly on-farm mixers, were on the Authority's register of establishments or intermediaries under the Feeding Stuffs (Establishments and Intermediaries) Regulations 1999, there was no record that any had been inspected.
- 7.21 It was not evident that the Authority was addressing its responsibilities for enforcing feedingstuffs legislation effectively.

Recommendations

- 7.22 The Authority should:
- (i) Ensure that feedingstuffs inspections are carried out at a frequency that is not less than that determined in centrally issued guidance. [The Standard – 7.1]
 - (ii) Assess the compliance of Approved and registered feedingstuffs premises in its area to legally prescribed standards. [The Standard – 7.3]
 - (iii) Set up, maintain and implement a documented inspection procedure for feedingstuff inspections. [The Standard – 7.4]

8 Food, Feedingstuffs and Food Premises Complaints

- 8.1 The Authority's documented policy on food and feedingstuffs complaints was set out in the 2004 – 2005 Service Delivery Plan.
- 8.2 The Authority had a documented procedure, last updated in December 2002, covering the investigation of food safety complaints. The procedure for the investigation of food standards complaints was set out in the Food Standards Enforcement Good Practice Guide. There was no documented procedure relating to the investigation of complaints about the hygiene of food premises, or complaints about feedingstuffs.
- 8.3 There was also information on the Authority's website about how members of the public could make a complaint about food and giving constructive guidance on precautions to be taken so as not to prejudice any subsequent investigation.

Food Hygiene

- 8.4 Records of ten food hygiene complaints and records of ten complaints concerning premises were examined and appropriate information was available in all cases.
- 8.5 Records demonstrated that complaints had received appropriate investigation, including submission of complaint specimens for laboratory examination, liaison with Home and Originating Authorities, and the inspection of food business premises. It was not always apparent, however, whether the investigation outcome had been communicated to the complainant.

Food Standards and Feedingstuffs

- 8.6 Records of 10 food standards complaints were examined. However one was found to be a service request for advice that had been wrongly coded. Records were sufficient to determine that an appropriate investigation had been carried out in five of the nine remaining cases examined. In the other four cases, records were incomplete. There was insufficient evidence to demonstrate that Home and Originating Authority contact had taken place when required.
- 8.7 There had been no complaints about feedingstuffs in the two years prior to the audit.

Recommendations

- 8.8 The Authority should:
- (i) Expand its documented procedures to include feedingstuffs complaints and complaints regarding food premises. [The Standard – 8.1]
 - (ii) Investigate food standards complaints received in accordance with the relevant Food Safety Act Code of Practice, centrally issued guidance and the Authority's policies and procedures. [The Standard – 8.2]

9 Home Authority Principle

- 9.1 The Food Law Enforcement Service Plan 2004 – 2005 stated that the Authority observed the LACORS Home Authority Principle.
- 9.2 There were no formal Home Authority agreements, but informal arrangements were in place with local manufacturers and other food businesses. There had also been recent contact with companies with a view to setting up more formal food standards Home Authority arrangements.
- 9.3 The Authority had identified nine food businesses for which it acted as Home Authority for food standards matters in the Service Plan.
- 9.4 Ten businesses for which the Authority acted as Home Authority were registered on the LACORS Internet website, all of which listed a contact for food standards matters, although two appeared not to be food businesses. The entries had been updated in April 2004.
- 9.5 Documented procedures confirmed that contact with Home and Originating Authorities, where appropriate, was built into the Authority's enforcement procedures and processes.
- 9.6 Officers had Internet access to the LACORS Home Authority database and could therefore identify relevant Home and Originating Authorities and local authority contacts.
- 9.7 Records that were examined during the audit demonstrated that the Home Authority Principle was being implemented, and that requests for information from other enforcing authorities were generally actioned appropriately, although a significant gap in proactive Home Authority activity between 2002 and summer 2004 was noted.

10 Advice to Business

10.1 The Authority demonstrated a proactive approach to helping local businesses comply with food law, exemplified by a number of initiatives that had been, or were being undertaken. These included:

- Food hygiene training courses in a number of ethnic languages;
- Guidance on the use of food colourings;
- Advice on food composition and labelling;
- HACCP awareness seminars;
- Food safety information packs;
- Using the Authority's Internet website to make information available to businesses;
- Advice on starting a new food business.

10.2 The Authority had also targeted specific business sectors including:

- Butchers' shops - meat products guidance and butchers licensing;
- Swansea market - food hygiene advice;
- Licensed premises - seminars for new licensees.

10.3 There was evidence that advice was provided on request and during the course of inspections.

10.4 There was no evidence of any advice to feedingstuffs businesses.

Recommendation

10.5 The Authority should:

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

11 Food and Feedingstuffs Premises Database

- 11.1 The Authority had a database of premises that were subject to food and feedingstuffs law enforcement in its area.
- 11.2 The Authority did not have a documented procedure to ensure that its food and feedingstuffs premises database was accurate and up to date, although the system administrators did run some checks to identify and correct inaccuracies and other problems.
- 11.3 The auditors randomly selected ten food businesses and one feedingstuffs business from categories in a local business directory. Nine of the ten food businesses had been recorded on the database, as had the feedingstuffs business.
- 11.4 All nine of the food businesses that were on the database had been included in the planned food hygiene inspection programme. However, only three had been included in the planned food standards inspection programme, and only these three businesses had any food standards enforcement history. The authority had no record of any food standards activity in the remaining six businesses.
- 11.5 Database reports that were produced during the audit indicated that 2142 food businesses were included in the food hygiene inspection programme but only 1380 in the food standards inspection programme, a difference of more than 750 premises. Both reports indicated that a number of food premises had not been risk rated, or risk rated as zero, for food hygiene and / or food standards.
- 11.6 The auditors were concerned to find significant errors in the database that affected the accuracy of the data recorded, and it was evident that inspection, risk rating and other action details were not always recorded on the database accurately.
- 11.7 Errors included incorrect inspection frequencies, missing next inspection dates, activities not being entered, and inconsistent coding. Some activities had not been coded correctly and others had been duplicated. This resulted in gaps and inaccuracies in business histories and errors in the food and feedingstuffs law enforcement activity data required by the Food Standards Agency.
- 11.8 However, it was recognised by the auditors that the Authority had made progress in addressing a number of the problems with the database that were highlighted during the audit.

11.9 Measures introduced to ensure the accuracy of premises details included checking against service requests with other council departments, press advertisements and undertaking surveys.

Recommendation

11.10 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. [The Standard – 11.2]

12 Food and Feedingstuffs Inspection and Sampling

Food Hygiene

- 12.1 The Authority's approach to food hygiene sampling was set out in the 2004 – 2005 Service Plan and in the draft quality management system guidelines dated December 2003.
- 12.2 There was a documented food hygiene sampling programme for 2004 – 2005 that included locally produced food and participation in co-ordinated surveys and the Authority had also established a comprehensive sampling programme to monitor the safety and quality of locally produced shellfish and laverbread.
- 12.3 Records of ten food hygiene samples were examined. These demonstrated that sampling had been targeted at a variety of local produce and that samples had been obtained in accordance with the planned food hygiene sampling programme.
- 12.4 Sample results were available in all cases, and records generally demonstrated that results had been recorded correctly and appropriate action taken to follow-up those that had been reported as unsatisfactory. Follow-up action included taking further samples, premises visits and inspections, and liaison with Home and Originating Authorities.
- 12.5 In a small number of cases, however, errors in the recording of results and follow-up activity on the database had resulted in the Authority under-reporting its food hygiene sampling work to the Food Standards Agency.
- 12.6 The Authority had a documented procedure relating to the detention, seizure and voluntary surrender of suspect food that was updated in October 2004.
- 12.7 Records relating to six voluntary surrenders of food for destruction that the Authority had dealt with in the two years prior to the audit were examined. Voluntary surrender certificates stated that the foods in question had been voluntarily surrendered to the officer who signed the certificate, but there was no record showing how, where or when the food had been disposed of in four of the six cases.
- 12.8 There had been no formal seizures or detentions of food in relation to food hygiene matters in the two years prior to the audit.

Food Standards and Feedingstuffs

- 12.9 The Authority had a documented sampling policy and procedure for food standards sampling and a risk based food standards sampling programme.
- 12.10 Food standards sampling was being undertaken, targeted at a variety of locally manufactured and produced products, with participation in co-ordinated surveys in accordance with the sampling programme. Sampling activity was also evident in relation to food complaints.
- 12.11 Records of ten food standards samples were examined. Sample results were available in all cases, and appropriate action had generally been taken to follow-up those that had been reported as unsatisfactory.
- 12.12 The Authority reported that it had undertaken some voluntary surrender activities in relation to out of date foods though the details had not been recorded.
- 12.13 The Authority also had a documented sampling policy and procedure for feedingstuffs samples.
- 12.14 Three informal feedingstuffs samples had been taken in the six months prior to the audit, and records showed that these had been taken in accordance with the planned programme. All three samples had been reported as satisfactory.
- 12.15 Documentation relating to the Authority's Public and Agricultural Analyst appointments appeared to be inconsistent with requirements to appoint individuals to these positions who met specified appointment criteria.

Recommendations

12.16 The Authority should:

- (i) Ensure that the voluntary surrender of food is undertaken in full accordance with relevant legislation, Food Safety Act Codes of Practice and centrally issued guidance. [The Standard – 12.1]
- (ii) Expand and implement the documented food hygiene sampling policy statement contained in the draft guideline on sampling. [The Standard – 12.4]
- (iii) Implement the documented food hygiene procedure for the procurement or purchase of samples, continuity of evidence and the prevention of deterioration or damage to samples as contained in the draft guideline on sampling. [The Standard – 12.5]
- (iv) Review and update its Public and Agricultural Analyst appointments taking account of all relevant legal requirements of the Food Safety Act 1990, associated Food Safety Act Codes of Practice and the Agriculture Act 1970. [The Standard – 12.8]

13 Control and Investigation of Outbreaks and Food Related Infectious Disease

- 13.1 The Authority had set up a documented policy and procedure relating to the control of outbreaks of food related infectious disease. The procedure had been developed jointly by the Authority and other relevant organisations in accordance with centrally issued guidance, and had recently been reviewed and updated.
- 13.2 There was no evidence that the Authority had formally adopted or endorsed the Outbreak Control Plan as its official policy and procedure.
- 13.3 Two incidents that satisfied the definition of a food poisoning outbreak were examined. Both had been investigated, appropriate samples and specimens had been taken where necessary, and information obtained through case and contact interviews had been followed-up.
- 13.4 However, there was no evidence to demonstrate that the exclusion of cases or contacts had been considered, and it was not possible to confirm that the investigations had been fully in accordance with the Outbreak Control Plan.
- 13.5 In addition to the Outbreak Control Plan, there was also a recently drafted documented procedure for the investigation of sporadic cases of foodborne infection. The auditors were advised that the procedure would be incorporated into the quality management system in due course.
- 13.6 The Authority had also introduced standard letters and a number of guidance documents giving information on specific infections.
- 13.7 Notifications relating to all eight sporadic cases of food related infectious diseases were examined. Notification and investigation records were available in all eight cases, although it was not evident that cases had been investigated in accordance with the documented procedure.
- 13.8 The records for the sporadic cases contained insufficient information to determine whether an appropriate investigation had taken place.
- 13.9 Records had been retained for a period of six years.

Recommendations

13.10 The Authority should:

- (i) Ensure that its documented procedure in relation to control of outbreaks of food related infectious disease is fully implemented.
[The Standard – 13.1]
- (ii) Ensure that its documented procedure for the investigation of notifications of food related infectious disease is fully implemented.
[The Standard – 13.2]

14 Food Safety Incidents

- 14.1 The Authority had a computer system that was capable of receiving Food Hazard Warnings. These were received by the Food and Trading Standards Team Leaders and their deputies and forwarded to other team members by e-mail.
- 14.2 There was a documented policy and procedure, updated in August 2004, for handling Food Hazard Warnings, although out of hours contact arrangements were not included, and arrangements for notifying the Food Standards Agency of incidents that occurred locally did not include the necessary detail.
- 14.3 Records of a sample of Food Hazard Warnings that were issued by the Food Standards Agency in the 6 months prior to the audit were examined. A number of these Food Hazard Warnings required the Authority to take action.
- 14.4 Records of all the Food Hazard Warnings checked were available in electronic format, although the action taken and outcomes had not been fully recorded in all cases.
- 14.5 When action had been necessary in response to a Food Hazard Warning, records showed that it was generally based on local knowledge and was appropriate. Local press releases had been issued and information placed on the Authority's Internet website when it was deemed appropriate to do so.
- 14.6 There had been no local incidents in the two years prior to the audit that required notification to the Food Standards Agency.

Recommendations

14.7 The Authority should:

- (i) Expand its documented procedure for responding to Food Hazard Warnings to include out of hours contact arrangements. [The Standard – 14.1]
- (ii) Document its response to, and the outcome of, all Food Hazard Warnings received. [The Standard – 14.3]
- (iii) Expand, maintain and implement its documented procedure for responding to food safety incidents. [The Standard – 14.4]

15 Enforcement

15.1 The Authority had a documented Regulatory and Enforcement Charter and a Regulatory and Enforcement Policy for the Environment and Health Directorate, both of which had been approved by Members in 1997 and updated and re-approved in 2002. Copies were available on the Authority's website.

15.2 The scope of the policy did not encompass the full range of food law enforcement options, for example, voluntary procedures

Food Hygiene

15.3 The Authority had used written warnings and Improvement Notices to achieve compliance with food hygiene legislation. Forty seven Improvement Notices had been issued in respect of 20 premises in the 2 years preceding the audit.

15.4 Enforcement decisions in relation to food hygiene matters had been in accordance with the Regulatory and Enforcement Charter and Policy, and took account of the particular circumstances of each case. In the cases that the auditors examined, these decisions appeared to have been proportionate and correct.

15.5 Records relating to ten Improvement Notices were examined and checked against centrally issued guidance, the Authority's enforcement policy, and relevant documented procedures.

15.6 Improvement Notices had been served in appropriate circumstances by properly authorised officers. In eight of the ten cases there was evidence that Improvement Notices had been followed-up to ensure compliance.

15.7 However, the address of the local court had not been given in any of the ten cases, and two notices had been addressed to the proprietor using his or her initials rather than their full name. In three cases a request for an extension of time for compliance had been granted, but the request had not been confirmed in writing, and the method of service of the notice had not been recorded in one case.

Food Standards and Feedingstuffs

- 15.8 The Authority had used written warnings, formal cautions and prosecutions to achieve compliance with food standards legislation.
- 15.9 The Authority had issued 3 formal cautions and undertaken 2 prosecutions in the 2 years before the audit. All actions were considered appropriate, had been taken under correct legislation and without any unnecessary delay. However, there was no evidence that the Authority's Regulatory and Enforcement Charter and Policy, PACE and RIPA had been considered.
- 15.10 The Authority did not have any documented procedures for follow up and enforcement actions.
- 15.11 The Authority's delegated powers were unclear as to whether officers who had taken decisions to authorise and initiate a prosecution or administer a formal caution had the delegated power to do so.
- 15.12 Although the Authority had undertaken prosecutions and formal cautions during 2003 - 2004, it was noted that no prosecutions or formal cautions had been reported in its quarterly monitoring returns to the Food Standards Agency for the same period.

Recommendations

- 15.13 The Authority should:
- (i) Expand and implement its Regulatory and Enforcement Policy in accordance with the relevant Food Safety Act Codes of Practice. [The Standard – 15.1]
 - (ii) Set up, maintain and implement documented procedures for all follow up and enforcement actions in accordance with the relevant Food Safety Act Code of Practice and official guidance. [The Standard – 15.2]
 - (iii) Ensure that decisions on enforcement action are made following consideration of the Authority's enforcement policy. The reasons for any departure from the criteria set out in the enforcement policy should be documented. [The Standard – 15.4]

16 Records and Inspection Reports

- 16.1 Inspections under the Food Safety (General Food Hygiene) Regulations had been recorded on a standard inspection report form until approximately 12 months before the audit. They contained detailed information in relation to all aspects of the food hygiene inspection. The discontinued use of these forms had resulted in much less comprehensive information being recorded.
- 16.2 Records and inspection reports of premises approved under product-specific food hygiene Regulations and licensed butchers' shops were generally well maintained.
- 16.3 File and database records included application forms and completed inspection records, and details of the businesses and the operations that were carried out, making it possible to determine that decisions to grant approvals or licence shops were generally based on relevant criteria.
- 16.4 Inconsistencies in the way that food standards inspections had been recorded resulted in there being insufficient information to determine whether a thorough and competent inspection had been carried out. In some cases there was also a lack of information regarding business profiles and descriptions of activities undertaken, and therefore records did not meet all of the requirements of the Food Safety Act Code of Practice No.8.
- 16.5 Records of food hygiene and standards sampling activity demonstrated that sampling had been appropriately targeted, and that unsatisfactory results had generally been followed-up. There were, however, some errors in the recording of food sampling activity on the database.
- 16.6 Details of Improvement Notices that had been recorded demonstrated that the Enforcement Policy had been followed and statutory requirements met, although this was not the case in respect of formal cautions and prosecutions for food standards matters.
- 16.7 Records of premises that had been registered under the Feeding Stuffs (Establishments and Intermediaries) Regulations 1999 lacked detail and had not been reviewed or updated since the Regulations first came into effect.

Recommendation

16.8 The Authority should:

Maintain up to date accurate records in retrievable form for all food and feedingstuffs premises in its area, in accordance with the Food Safety Act Codes of Practice and centrally issued guidance.

[The Standard – 16.1]

17 Complaints about the Service

- 17.1 The Authority had set up and implemented a Corporate Complaints Procedure.
- 17.2 A summary of the corporate procedure had been published and was available from Civic Buildings and on the Authority's website.
- 17.3 There was also a documented procedure, updated in August 2004, setting out the departmental arrangements for implementing the corporate procedure in respect of complaints about the food and feedingstuffs enforcement service.
- 17.4 One formal complaint against the food and feedingstuffs law enforcement service had been received in the two years prior to the audit. Records confirmed that this had been investigated in accordance with the corporate procedure and appropriately resolved.

18 Liaison with Other Organisations

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

- Welsh Heads of Trading Standards;
- Welsh Heads of Environmental Health Group;
- Directors of Public Protection Wales;
- South West Wales Communicable Disease Task Group;
- South and West Wales Food and Agriculture Standards Group;
- South West Wales Food Safety Task Group;
- Food and Agriculture Standards Group for Wales;
- South West Wales Shellfish Liaison Committee;
- South West Wales Zoonoses Group.

18.2 Minutes of liaison group meetings confirmed there was regular attendance by appropriate representatives of the food and feedingstuffs enforcement services.

18.3 The Authority also had active liaison arrangements with:

- South Wales Sea Fisheries Committee;
- Food Standards Agency Wales;
- The Meat Hygiene Service;
- Local Authorities Co-ordinators of Regulatory Services;
- Department for Environment Food and Rural Affairs;
- The Centre for Environmental Fisheries and Aquaculture Science;
- Other local authorities;
- The Health Authority and successor bodies;
- State Veterinary Service;
- Swansea Bay Port Health Authority;
- Public Analyst;
- Welsh Local Government Association;
- National Public Health Service.

18.4 The Authority's commitment to sharing expertise and supporting Agency initiatives, demonstrated by the nomination of one of its officers to serve on the Illegal Meat Task Force was particularly noteworthy.

19 Internal Monitoring

- 19.1 The Authority did not have a documented internal monitoring procedure for monitoring the quality and consistency of inspections or the progress of its planned inspection programmes in accordance with the relevant Food Safety Act Code of Practice.
- 19.2 There was some evidence of quantitative monitoring against the planned inspection programmes and that priority was given to the inspection of high-risk premises. This included quarterly reporting, monthly analysis of database activity reports and checks against service requests.
- 19.3 The auditors were advised that qualitative monitoring had also taken place. This included checking documentation and correspondence linked to formal enforcement actions, accompanied visits and the induction of new members of staff.
- 19.4 The Director reported regularly on performance monitoring and financial management to senior management colleagues.
- 19.5 There was very little evidence that all the reported internal monitoring activity had been recorded.

Recommendations

- 19.6 The Authority should:
- (i) Set up, maintain and implement documented internal monitoring procedures in accordance with the relevant Food Safety Act Code of Practice and centrally issued guidance. [The Standard – 19.1]
 - (ii) Verify its conformance with all relevant aspects of The Standard, legislation, Food Safety Act Codes of Practice, centrally issued guidance and the Authority's own documented policies and procedures. [The Standard – 19.2]
 - (iii) Maintain records of all internal monitoring for at least 2 years. [The Standard – 19.3]

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 October 1999.
- 20.2 The Authority's commitment to such exercises was evidenced by participation in a forthcoming Health and Safety Inter Authority Audit and a recent pilot review of the Trading Standards Service.
- 20.3 The Authority was accredited to ISO 9002 and was reviewing its quality system in preparation for an application to another accreditation body at the time of the audit. A working group was managing the review project and had prepared a programme of internal compliance audits by officers independent of the service under scrutiny.
- 20.4 The consumer advice service had been awarded a Community Legal Service Quality Mark.

21 Food and Feedingstuffs Safety and Standards Promotion

- 21.1 The Authority demonstrated a commitment to food safety and standards promotion.
- 21.2 The Authority had a Health Promotion section dedicated to increasing awareness of health, safety and healthy lifestyles to maximise the health and well being of residents.
- 21.3 The Health Promotion section co-ordinated the Crucial Crew event in 2004 which was offered to all primary schools in the area. The scheme was aimed at highlighting current issues relating to a safe and healthy lifestyle and was jointly delivered by a multi agency partnership.
- 21.4 The Authority worked closely with schools to promote food safety and standards awareness to children. The 2004 food safety week campaign focussed on hand washing and winning designs from a poster competition were reproduced for wider circulation. Food standards was amongst a wide range of consumer issues included in the Young Consumer of the Year competition.
- 21.5 There was also evidence that the Authority participated in a range of food safety and standards promotional activities, and there were plans for further work in this area. Activities included:
- Food hygiene training;
 - National Consumer Week;
 - Welsh Food Hygiene Awards;
 - No Smoking Dining Guide;
 - Centre for Health and Environment Research and Expertise Food Hygiene Awareness Day;
 - Barbecue Campaign;
 - Distribution of leaflets;
 - Promotion of the service on the website and in the media.
- 21.6 There was no evidence of any promotional activity relating to feedingstuffs.

Recommendation

21.7 The Authority should:

Expand its promotional activity to include feedingstuffs.
[The Standard – 21.1]

Auditors:

Jane Davies

Rob Wilkins
Lindsay Horth
Keith Blake
Tony Wheale

Food Standards Agency Wales
11th Floor Southgate House
Wood Street
Cardiff
CF10 1EW

ANNEX

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.
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 food 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.