

**Report on the Food Law Enforcement
Service**

**Copeland Borough Council
22nd - 24th May 2001**

Foreword

Audits of local authorities' 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 feeding stuffs is largely the responsibility of local authorities. These local authority regulatory functions are principally delivered through their Environmental Health and Trading Standards Services.

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

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

www.foodstandards.gov.uk/pdf_files/fsa_framework.pdf.

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

The report contains some statistical data, for example on the number of food premises inspections carried out. The Authority's activity data for 2000 has also been reproduced at Annex A. The Agency's website contains enforcement activity data for all UK local authorities and can be found at:

www.foodstandards.gov.uk/lalist/authindex.htm.

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

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

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1. Introduction

Reason for the Audit

- 1.1 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 Copeland Borough Council was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme.
- 1.2 Copeland Borough Council was selected for audit because of 1999 monitoring information provided to the Agency under section 13 of the Food Standards Act 1999, which indicated that the Authority had undertaken a reasonably high level of food hygiene inspection activity. Further details of monitoring statistics can be found at:
www.foodstandards.gov.uk/lalist/authindex.htm.
- 1.3 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 at www.foodstandards.gov.uk/industry/report_foodlaw1stpg.htm. Hard copies are available from the Food Standards Agency Library at Aviation House, 125 Kingsway, London WC2B 6NH, Tel: 020 7276 8181. This is subject to a reproduction and handling fee of £7.50 plus £1.50 postage and packing.

Scope of the Audit

- 1.4 The audit covered Copeland Borough Council's food hygiene law enforcement service. Food standards and feeding stuffs law enforcement is the responsibility of the County Council and was therefore not included within the scope of this audit. The on-site element of the audit took place at the Authority's office at Catherine Street, Whitehaven, Cumbria on 22-24 May 2001.
- 1.5 The audit assessed the Authority's conformance against the Standard, using the audit protocol FSA/AP3/1 - FSA/AP21/1. The Standard was adopted by the Food Standards Agency Board on 21 September 2000 and forms part of the Agency's Framework Agreement with local authorities. The Framework Agreement and the audit protocols can be found on the Agency's website at:
www.foodstandards.gov.uk/pdf_files/frs_framework.pdf and
www.foodstandards.gov.uk/industry/la_enforce/frame_agree_audit.htm
respectively.

Background

- 1.6 The Authority serves a population of 71,500, covers an area of 284 square miles, and the main towns are Whitehaven, Cleator Moor, Egremont and Millom. Two-thirds of the Borough lies within the Lake District National Park and although tourism and the service sector provide a source of employment, by far the predominant employer within the district is the nuclear industry which employs over 10,000 people at its Sellafield site and accounts for around 40% of employment in the Borough. Unemployment is well above the national average. On deprivation indicators four of the worst electoral wards in the North West are in Copeland. The Authority advised that “regeneration and housing are major local objectives and food safety is also important for public health reasons and because of the jobs potential of food manufacturing”.
- 1.7 Food hygiene enforcement was carried out by officers of the Environmental Health (Commercial) Services Section; part of the Development and Environment Business Unit located at the Catherine Street offices in Whitehaven. The Council also operated an out of hours service on an emergency only basis for aspects of environmental health, with a contact number available for members of the public.
- 1.8 In addition to food hygiene enforcement, Environmental Health (Commercial) Services Section officers were also responsible for the delivery of a range of services including occupational health and safety, water quality, health promotion and pest and animal control services.
- 1.9 The Development and Environment Unit Business Plan for 2001/2002, agreed by the Policy Forum on the 18 April 2001 and endorsed by Full Council on the 26 April 2001, detailed staffing levels for the Environmental Health (Commercial) Services team as 12 officers. Of these 12 officers, 4 were employed in dog and pest control duties, 2 were clerical, and 2 were technical assistants who undertook no formal food duties. The remaining 4 officer posts had food enforcement duties, although 1 of the posts, the Principal Environmental Health Officer (PEHO), did not carry out day to day food safety enforcement, and 1 officer was not due to complete formal training until December 2001.
- 1.10 The Authority had not produced a Food Service Plan for 2001/2002 and therefore the actual staffing resources needed to deliver the food safety service in terms of full time equivalents was not available. However, the Unit’s 2001/2002 Business Plan indicated that only 45% of commercial staff time would be spent on food related work with the remaining 55% of time spent on other commercial work including licensing inspections, occupational health and safety, pest control and administration.

- 1.11 The approved budget cost for the Development and Environment Unit for 2001/2002 detailed in the 2001/2002 Business Plan was £836,647. The Food Safety Service financial costs for the same period, including Infectious Diseases, were £105,857.
- 1.12 The Authority's Official Control of Foodstuffs Directive (OCD) returns for 2000 indicated that the Environmental Health (Commercial) Services Team was responsible for enforcing food hygiene legislation in 1,142 premises. These food businesses were predominantly within the catering and retail sectors. The returns indicated that the Authority carried out:

Enforcement activity	No.
Food hygiene inspections	331
Other food hygiene visits	149
Informal samples	103
Formal samples	0

2.	Executive Summary
2.1	The audit highlighted a number of serious deficiencies of both an operational and procedural nature in the service. Key shortcomings were found in relation to internal management arrangements, enforcement actions and database and record keeping. There was also particular concern about the qualification, training and experience of authorised officers. These shortcomings were compromising local enforcement actions which are taken to protect the consumer.
2.2	Investigations of food complaints and informal food surveillance activities were dealt with in a sound and responsible way. The Authority was also proactively engaged in food safety promotional work and providing business advice.

2.3 **The Authority's Strengths:**

- *Food Complaints* – Food complaints received thorough investigation with full details recorded on file. Appropriate liaison with food businesses' Home Authorities took place and both complainants and businesses were consistently notified of the outcome of investigations.
- *Sampling* – The Authority had a good sampling programme and procedures. Although the Authority did no formal sampling, informal surveillance and monitoring took place with unsatisfactory sample results consistently followed up in all instances.
- *Promotional Activity and Advice to Business* – The Authority demonstrated a positive approach to working with business. The Authority was actively engaged in promoting food safety and provided a wide range of information sheets and advice.

2.4 **Key Areas for Improvement**

- *Authorised Officers* – There was concern on the part of the auditors in relation to the level of experience and training of authorised officers in certain aspects of food law enforcement work which could seriously undermine the effectiveness and quality of the service provided and invalidate enforcement action taken by the officers. Also, the Authority's Scheme of Delegation was out of date and authorisations made under it did not reflect officer's qualifications and experience.

- *Enforcement* – The evidence examined in relation to enforcement actions highlighted problems in administration, officer training and internal monitoring of enforcement work. This was particularly evident in relation to the drafting of improvement notices. Officers were unaware of, and not following centrally issued guidance.
- *Database/Computer Software System* – The Authority’s database of food premises was inaccurate and incomplete. The software system utilised by the Authority was not capable of recording sufficient information to enable the Authority to make its returns to the Food Standards Agency on its enforcement activity. A complete and accurate database is essential to support and effectively manage the Authority’s inspection programme and enable the Authority to monitor compliance with its own performance indicators.
- *Internal monitoring* - With the exception of some limited quantitative performance monitoring there were no monitoring procedures or evidence in practice of management monitoring of food law enforcement activity other than at junior management level. Monitoring of enforcement work, by officers experienced in enforcement procedures and knowledge of centrally issued guidance, will help ensure an effective and consistent approach to enforcement within the Authority. More attention in particular needs to be given to enforcement notices and prosecution work.
- *Record keeping* - The records held by the Authority lacked detail in regard to the assessment of compliance made by officers during inspection and generic details of the business itself, such as the size and nature of the undertaking. File records need to provide sufficient detail so that the appropriateness of any action taken can be assessed, and for the history of events to be clearly documented. The Authority will need to know the history of a business to assess the most appropriate form of enforcement action to take if required and to enable effective internal monitoring of their activities.

3 Audit Findings

3.1 Organisation and Management

3.1.1 The Council operated under a cabinet structure, with the Cabinet making recommendations to a Policy Forum on operational issues in all service areas. Food safety fell under the terms of reference of the Cabinet Member for Development and Environment.

3.1.2 The departmental structure of the Council comprised 9 Business Units reporting to a Senior Management Team of a General Manager and 2 Service Directors. The Environmental Health (Commercial) Service was part of the Development and Environment Unit - one of 3 Business Units reporting to the Community Regeneration Director.

3.1.3 The corporate planning framework included the Best Value Performance Plan (BVPP); the 2001/2002 plan was published in March 2001. The BVPP contained information about the food safety service, detailed performance in the previous year, and set out key objectives and performance indicators for the forthcoming year. The performance indicators used for food safety for the years 1999/2000 and 2000/2001 were:

- The percentage of planned inspections of high risk food premises actually carried out.
- The percentage of planned inspections of other food premises actually carried out.
- The percentage of food hygiene complaints responded to within five working days.
- The percentage of food premises found to be unsatisfactory on routine inspection.

3.1.4 The 2001/2002 BVPP stated that in 1999/2000, the Authority carried out 92% of its planned high risk inspections and 94.4% of its planned inspections of other premises. It responded to 80% of food hygiene complaints within 5 working days and 70% of food premises were found to be unsatisfactory on routine inspection. The Authority estimated in its BVPP that it would have undertaken 75% and 37% of its planned inspection programme for high risk and other premises respectively in 2000/2001. Of those inspections, the Authority was anticipating that 25% would be found to be unsatisfactory. The Authority had also estimated that it would have met its 5 working day performance target for responding to food complaints in 95% of cases.

- 3.1.5 The whole of the Environmental Health Service, including the Food Service element, is scheduled for Best Value service review beginning in 2002 (Year 3 of the Council's 5 year service review plan).
- 3.1.6 A corporate style business plan was produced each year by the Development and Environment Business Unit. Whilst the detail in the Business Plan included information on staffing, finances, and performance monitoring, the majority of matters detailed in the Food Service Planning Guidance given in Chapter 1 of the Framework Agreement were omitted, for example: an indication of the demands on the service; information on food premises inspections; statements on enforcement policies; and details on the number of full time equivalent staffing levels.
- 3.1.7 In March 2001 the Authority had produced and published a document entitled "Standard For Meeting The Borough Council's Obligations Regarding Enforcement Of Food Law". This document set out the standard at which Copeland's food law enforcement service operated and contained detailed information on a range of matters under headings similar to those found in the Standard within the Framework Agreement.

Recommendation

- 3.1.8 The Authority should:

Draw up, document and implement a Service Plan in accordance with the Service Planning Guidance given in Chapter 1 of the Framework Agreement. Alternatively, adapt the corporate business plan ensuring that the information requirements in the guidance are included and identifiable within the business planning document. Ensure that the Food Service Plan, or other business planning document, is submitted to the relevant Member forum for approval. [The Standard – 3.1]

3.2 Review and Updating of Documented Policies and Procedures

- 3.2.1 The Authority had a documented policy which stated that “each of its policies and their implemented procedures are reviewed on an annual basis, or when legislation/guidance changes”. The review would normally take place to coincide with the production of the Annual Service Plan (between late January-March each year).
- 3.2.2 The Authority had produced a number of policies and procedures in relation to its food service; examples included an enforcement policy, a sampling procedure and a food complaints policy. However, there was no evidence of a planned system for controlling the review and updating of such documentation. Review and update was on an ad-hoc basis and the absence of issue numbers or dates on many of its documents may hinder effective control.
- 3.2.3 Officers had access to up to date copies of Food Safety Act Codes of Practice, legislation, published Food Industry Guides and the internet. There was however one instance where officers also had access to a superseded document in the form of an out of date copy of a supplement to Food Safety Act Code of Practice No. 16: Enforcement of the Food Safety Act 1990 in relation to the Food Hazard Warning System. A current copy of the same code was later seen to be present in hard copy in a commercial food law encyclopaedia maintained on site.

Recommendation

- 3.2.4 The Authority should:

Set up a control system for all documentation relating to its enforcement activities ensuring that superseded documents are removed from use throughout the Authority. [The Standard - 4.2]

3.3 Authorised Officers

- 3.3.1 Under the Council's draft Scheme of Delegation 2001/2002 the Chief Legal Officer was the officer designated to issue authorisations to officers. The Head of Development and Environment had been given delegated powers to take action under the Food Safety Act and associated legislation relating to food safety and food premises. The delegated powers covered the issuing of licences in respect of a variety of matters including "milk, dairies and ice cream". Butchers licences issued by the Authority had been authorised by the Head of Development and Environment although the issue of such licences did not appear to be covered in the Scheme of Delegation.
- 3.3.2 The Authority had a documented policy and a procedure for the authorisation of its officers. The procedure for the authorisation of officers covered new appointments, update training and qualifications, together with the appointment of a lead officer for food safety, authorisation of officers for food hygiene enforcement and review of authorisations. The procedure included documentation for recording the assessment, training and review of officer authorisations in regard to food hygiene enforcement work in accordance with Food Safety Act Code of Practice No. 19: Qualifications and Experience of Authorised Officers.
- 3.3.3 The Authority's authorisation procedure stated that "The Lead Officer for Food Hygiene and Safety will normally be the Senior Environmental Health Officer (Commercial). This officer shall be appointed by the Head of Development and Environment after undertaking an assessment of their specialist knowledge". The audit found no evidence that any formal appointment or assessment had occurred, although the Authority had notified the details of its lead officer to the Food Standards Agency.
- 3.3.4 There were major concerns about the qualification, training and experience of authorised officers. The Authority had issued blanket authorisations across the Department with 7 officers authorised to carry out food related enforcement work. Only 3 of these officer posts were environmental health officer (EHO) posts involved in day to day food law enforcement and had undergone the assessment required to be authorised in accordance with the Authority's own procedure. One of the officers was authorised to undertake inspection of lower risk food premises (category C-F) and food sampling, although the officer had no formal qualification as required under Food Safety Act Code of Practice No. 19.

- 3.3.5 One officer was authorised to undertake inspections of all risk premises and serve improvement notices although the Authority's own assessment of officer competency indicated that the officer had not demonstrated their competency in key enforcement areas. One officer was authorised to carry out all food related enforcement duties including service of emergency prohibition and improvement notices following self-assessment against the Authority's assessment procedure. In addition, the PEHO had blanket authorisation despite that person confirming that they were neither actively engaged in day to day food work nor comfortable in assessing the requirements of current food legislation.
- 3.3.6 Senior officers who may have been called upon to carry out food enforcement duties in emergencies, including those officers who could be contacted on an emergency basis, were not subject to the Authority's own assessment procedures on competency in relation to food hygiene enforcement matters and the requirements of the Food Safety Act Code of Practice No. 19: Qualifications and Experience of Authorised Officers.
- 3.3.7 The Authority had attained the Investors in People award and maintained a corporate approach to the training of its officers. It had a documented corporate training programme with individual training needs identified during annual appraisals. Departmental training needs were included in an annual training plan. There was no specific training budget for individual departments; these were centrally controlled.
- 3.3.8 Based on the results of officer interviews and evidence obtained during the audit (see paragraph 3.13.2) the audit team had significant concerns whether the Authority's officers authorised to carry out food enforcement work possessed suitable qualifications, training and experience consistent with their authorisations and duties and in accordance with the relevant Food Safety Act Code of Practice.
- 3.3.9 Records of relevant academic and other qualifications, training and experience of some of the Authority's officers were being maintained by the Authority. However, records kept did not cover all authorised officers and details of the content, objectives, duration and assessment of some in-house training courses were not being maintained on file.

Recommendations

3.3.10 The Authority should:

- (i) Review its scheme of delegation and authorisation to ensure that all officers involved in food law enforcement are properly authorised, qualified and experienced to carry out their duties in accordance with the Food Safety Act and Food Safety Act Code of Practice No. 19: Qualifications and Experience of Authorised Officers. [The Standard - 5.1]
- (ii) Ensure that all officers involved in food law enforcement are trained in all technical and administrative aspects of the work in which they are involved and that where training is given in-house details of the content and duration of that training are maintained on file. [The Standard - 5.4]
- (iii) Ensure that records of relevant academic and other qualifications of training and experience are kept for all its authorised officers, including those authorised officers who may not be directly involved in day to day food law enforcement. [The Standard - 5.5]

3.4 Facilities and Equipment

- 3.4.1 The Authority had made available the facilities and equipment necessary to permit all activities associated with the service to be carried out.
- 3.4.2 The Authority had established and implemented a documented procedure to ensure that equipment was properly maintained and calibrated, and removed from service when found to be defective. The calibration procedure did not provide for calibration of officers' thermometers and probes (as a combined system) nor did it cover officers checking the accuracy of measuring equipment before and after taking any enforcement action in accordance with Food Safety Act Code of Practice No. 10: Enforcement of the Temperature Control Requirements of the Food Hygiene Regulations. The Authority could not be certain therefore that accurate temperature monitoring was being carried out by its officers.
- 3.4.3 Calibration of thermometers and other equipment used by the food section was undertaken every three months. All relevant information regarding the identification, calibration status and results of service checks was being recorded.
- 3.4.4 The amount, storage, format and type of information held by the Authority's computer software package was limited by the basic and outdated configuration of the package. It was not capable of providing all information reasonably requested by the Food Standards Agency without resorting to the manual back-up system.
- 3.4.5 The Authority had corporate arrangements through its information technology section which ensured that appropriate back-up systems were implemented to minimise the risk of corruption or loss of information held on the database.

Recommendations

3.4.6 The Authority should:

- (i) Review the documented calibration procedure to include reference to ensuring calibration of the combined thermometer systems including probes and that checks on the accuracy of the measuring equipment before and after enforcement action being taken is carried out. [The Standard – 6.2]
- (ii) Ensure that the computer software package or other method of record administration is capable of providing any information reasonably requested by the Food Standards Agency. [The Standard – 6.4]

3.5 Food Premises Inspections

- 3.5.1 According to the Authority's BVPP 2001 and the unit's Business Plan for 2001/2002 there were approximately 1,100 food premises in the Borough. Further, the Business Plan stated that there were 819 registered food premises in the Borough. A breakdown of food premises by risk category and by premises type, requested as part of the audit process resulted in two further figures being produced by the Authority for the total number of food premises in its area. Total numbers of food premises by risk category was "estimated" to be around 810 and by premises type 767. The Authority was aware of these discrepancies arising from the computer software. However, these shortcomings made it difficult to determine whether all premises were being inspected in accordance with the relevant legislation, Food Safety Act Codes of Practice and centrally issued guidance.
- 3.5.2 The inspection histories of 10 premises were examined. All 10 premises had been inspected during the preceding 2 years at the correct inspection frequency in regard to the risk classification allocated by the Authority, in line with the inspection rating system set out in the Food Safety Act Code of Practice No. 9: Food Hygiene Inspections.
- 3.5.3 File records in relation to the risk rating allocated to premises by the Authority for the 10 selected premises demonstrated 6 out of 10 premises to have been correctly risk rated. However, indications of over-rating or inconsistent rating were found in the other 4 premises.
- 3.5.4 Assessment of 7 Approved Premises file records found that in all cases the most recent inspections had been carried out at the required frequency and all premises had been allocated a risk category A rating.
- 3.5.5 Ten licensed butchers premises files were examined and generally actions were found to accord with centrally issued guidance. However, assessments made by the Authority in determining licence applications did not contain a description of operations at the premises or whether the premises was assessed as falling within the scope of the licensing regulations. In the case of 3 'mixed business premises' there was no indication in the assessment that the licence conditions only applied to certain parts of the premises.
- 3.5.6 The Authority had recently made use of the Local Authorities Co-ordinating Body on Food and Trading Standards (LACOTS) inspection proformas for recording information on its Approved Premises. The Authority's files lacked information on some minor approval matters and, in relation to the approval documents themselves, there was little or no information in regard to the activities,

products and quantities of product for which the premises was being approved. In respect of Approved Premises the Authority may wish to consider reviewing and reissuing approval documents.

- 3.5.7 The Authority had recently implemented the use of the LACOTS standardised "Premises General Information for File" form as a means by which background information and basic assessments of legal compliance could be collected during inspection visits. Two of 10 premises files examined contained completed forms. Of the other 8 files examined, (where the LACOTS form had not been used) information regarding the size and scale of the business, the type of food activity, hygiene training and an assessment of the business's Hazard Analysis was not being recorded. (As such, a proper internal monitoring assessment of the compliance of these premises and systems with legally prescribed standards was not taking place).
- 3.5.8 The Authority made use of a standard report format and a report was issued after every visit. Where a premises was found to be satisfactory on inspection, a standardised summary report letter of the inspection was sent out. If a report was required, officers were expected to provide the more detailed inspection report together with a schedule of works required.
- 3.5.9 The Authority had produced a documented inspection procedure but it did not cover the full range of inspections carried out. For example, Approved Premises and butchers licensed premises were not covered by the procedure.
- 3.5.10 Information gained during auditor interviews with officers indicated that not all observations made and/or data obtained in the course of an inspection was recorded and thereby retrievable by the Authority. Officers were issued with Police and Criminal Evidence Act notebooks however, they also used their own systems to record information. The Authority had introduced a file note system to help ensure all relevant information was being kept on file.

Recommendations

3.5.11 The Authority should:

- (i) Ensure that the legal compliance of food premises is assessed in accordance with the legally prescribed standards. Use by the Authority of centrally produced inspection forms and information collection sheets will aid this process. [The Standard – 7.4]
- (ii) Extend the range of its documented inspection procedures to include Approved Premises and licensed butchers premises. [The Standard – 7.5]
- (iii) Ensure that all observations made and/or data obtained during the course of inspections is recorded and stored in such a way that it is retrievable. [The Standard - 7.6]

3.6 Food Complaints

- 3.6.1 The Authority had a documented policy on dealing with food complaints in which it stated that it had adopted the LACOTS Guidance on Food Complaints – Second Edition November 1998, as its documented procedure.
- 3.6.2 A complaint file was made up for each separate food complaint. Eight complaint files were examined; in all cases where required there was evidence of liaison having taken place between the Authority and other Home or Originating Authorities.
- 3.6.3 In all cases examined the action taken was in line with the Authority's policy and procedures.

3.7 Home Authority Principle

- 3.7.1 The Authority had not entered into any Home Authority arrangements and the auditors were informed that no requests to do so had been made by food businesses in the Authority's area. There was significant evidence in relation to the investigation of food complaints to demonstrate that officers had had regard to advice received from other authorities and/or had provided information back to those authorities where necessary.

3.8 Advice to Business

- 3.8.1 The Authority had produced a document stating its policy in relation to working with businesses to help them comply with the law. Over and above advice given during inspections and in response to enquiries, the Authority had produced and made available to businesses a range of information leaflets and advice booklets. These included a Food Hazard Analysis Advice booklet to caterers and a Temperature Log Book to aid effective temperature control. The Authority had also produced an advice sheet “What to expect when an environmental health officer calls” which it provided to all businesses at the time of inspection.

3.9 Food Premises Database

- 3.9.1 The Authority had set up and maintained a database of the food premises in its area.
- 3.9.2 In light of the recognised difficulties with the computer software system, the Authority had recently initiated a manual accuracy check of all its database records. The Authority had drawn up a documented procedure for updating the database which they were in the process of implementing to ensure the database was accurate and up to date.
- 3.9.3 A check of the accuracy of the database found that details of 10 food premises randomly selected from a local business directory were present on the Authority's database.

Recommendation

3.9.4 The Authority should:

Continue its manual check of its food premises database and ensure that it is accurate and up to date. [The Standard - 11.1]

3.10 Food Inspection and Sampling

- 3.10.1 The Authority reported taking a total of 103 food samples during the year 2000, all of which were taken informally.
- 3.10.2 The Authority had both a documented policy and programme which accorded with centrally issued and relevant guidance and included reference to the Authority's participation in LACOTS and Public Health Laboratory voluntary co-ordinated sampling programmes.
- 3.10.3 The Authority's sampling programme provided for sampling in high risk premises, Approved Premises and included water sampling where water was used as a food ingredient. The Authority's sampling programme for 2001 provided for a total of 206 informal samples to be taken. This figure did not include samples taken as part of externally co-ordinated programmes such as the LACOTS/Public Health Laboratory Service (PHLS) programme. Sampling costs were budgeted into the overall food service budget.
- 3.10.4 The Authority had a documented procedure for the procurement and purchase of food samples and the Authority was sampling in line with its sampling policy and procedures.
- 3.10.5 The file records of a number of sample results were examined. Seven records related to unsatisfactory sample results were examined. In all cases appropriate follow-up action had been taken by the Authority, information/advice had been given and re-sampling carried out.
- 3.10.6 The Authority had formally appointed the County Analyst of Lancashire County Council as its Public Analyst in relation to food matters. All laboratories used by the Authority were fully accredited and on the list of official laboratories detailed on the Food Standards Agency website.

3.11 Control and Investigation of Outbreaks and Food Related Infectious Disease

- 3.11.1 The Authority had adopted the “Major Outbreak Plan” of the North Cumbria Health Authority. The document detailed a multi-agency approach to controlling outbreaks of communicable diseases in the Health Authority’s area and was last revised in March 2001. There had been no food poisoning outbreaks during 2000/2001 so it was not possible to audit compliance with the procedure.
- 3.11.2 The Authority also had a documented policy and procedure developed in association with all relevant organisations for the investigation of notifications of food related infectious diseases.
- 3.11.3 The files of 6 infectious disease notifications made to the Authority were examined and in all cases the file records indicated appropriate follow-up action.

3.12 Food Safety Incidents

- 3.12.1 The Authority had set up and implemented a documented procedure for responding to food hazard warnings (FHWs) received from the Food Standards Agency. The Authority was capable of receiving FHWs electronically.
- 3.12.2 The Authority documented the responses and the outcomes for all FHWs it had received. The Authority's response to a sample of 6 FHWs issued by the Agency since January 2001 was examined. A documented record of receipt and the Authority's response was evident in 5 of the 6 warnings checked. There was no record of the remaining FHW having been received by the Authority.
- 3.12.3 The Authority had set up and implemented a documented procedure in relation to food safety incidents. The procedure included clear and easy to follow standard forms on which officers could record responses and/or notify the Agency of appropriate food safety incidents.

Recommendation

- 3.12.4 The Authority should:

Ensure that it has a copy of, and documents its response to, all FHWs issued by the Agency. [The Standard -14.3]

3.13 Enforcement

- 3.13.1 The Authority had set up and implemented a documented Enforcement Policy. The policy document was based on the Government's Cabinet Office Enforcement Concordat and was supported by a Food Safety Enforcement Procedure. The policy document had been approved by the relevant Local Authority Member forum in August 2000. There was no evidence that the Enforcement Policy or an accurate summary was readily available to the public or food businesses in the Authority's area.
- 3.13.2 In the 2 years preceding the audit, the Authority had undertaken 3 formal cautions, issued 1 voluntary surrender certificate for food and served enforcement improvement notices on 7 premises. Based on an examination of relevant file records the Authority was not carrying out food law enforcement in line with the relevant Food Safety Act Codes of Practice and there were significant shortcomings found in this area.
- 3.13.3 In the cases of formal cautions issued there was no evidence in the files to indicate that relevant investigations had had regard to The Criminal Procedures Investigations Act 1996.
- 3.13.4 The Authority's own enforcement procedures in relation to formal cautions stated the appropriate circumstances for issuing cautions including the safeguarding of the suspected offender's interests. In 1 case file records showed that a formal caution was issued 2 days before witness statements appeared to have been collected. Further, the caution appeared to have been agreed and signed by the offender before seeing the evidence. At the time the caution was given, the Authority did not appear to have sufficient evidence on record to consider taking a prosecution.
- 3.13.5 On all 3 cautions the Authority had failed to state correctly the details of the legislation breached. For example, one caution referred to a 'Regulation' when it was a 'Section' of the Food Safety Act which had been breached.
- 3.13.6 With regard to voluntary surrender action the surrender certificate had not been signed as required by Food Safety Act Code of Practice No. 4: Inspection, Detention and Seizure of Suspect Food.
- 3.13.7 Fifteen improvement notices relating to 4 food premises were examined. The format of the notices was generally in accordance with Food Safety Act Code of Practice No 5: The Use of Improvement Notices. Relevant background information in respect of appeals, timings and works of equivalent effect were appropriately stated. However, the drafting of 14 of the 15 notices served was poor. Details of the

regulations contravened, the officers reasons why the requirements of the legislation were not being met and the works required were not clear or readily understandable.

- 3.13.8 'Minded to' notices which had been appropriately served in all cases prior to the improvement notices did not state the minimum 7 or 14 day period in which the recipient of the notice could make oral or written representations to the Authority.
- 3.13.9 None of the 14 notices examined reflected guidance given in the relevant Food Safety Act Code of Practice or LACOTS guidance on the drafting of improvement notices. It was evident during officer interviews that officers were neither aware of the LACOTS guidance nor did the Authority have copies to hand.
- 3.13.10 The Authority reported that it had identified shortcomings in the area of enforcement administration. Auditors were shown recently purchased "procedural enforcement packs" which the Authority was in the process of introducing into its enforcement work.

Recommendations

- 3.13.11 The Authority should:
- (i) Ensure that its documented enforcement procedures are being observed by officers carrying out enforcement activity. [The Standard – 15.1]
 - (ii) Ensure that enforcement actions are carried out in accordance with the relevant Food Safety Act Code of Practice. [The Standard – 15.2]
 - (iii) Ensure that the Enforcement Policy, or a summary of it, is readily available to the public and food businesses. [The Standard –15.3]

3.14 Records and Inspection Reports

- 3.14.1 Records of all inspections undertaken by the Authority were contained in premises files and the database. However, the amount of background information recorded on the database was very sparse as a result of limitations in the software system. In line with the Authority's procedures, a copy of the inspection report following each visit was held on file although, for the 10 premises inspection reports examined the detail of information contained in individual reports was very variable. Where the Authority had issued a 'standard summary report' following an inspection, some of the reports were not fully completed.
- 3.14.2 Records for licensed butchers premises and Approved Premises lacked information on the size and scale of the businesses, the types of activities undertaken and the approval documents themselves. The recent introduction in to the Authority's procedures of LACOTS and other standard information recording sheets should aid future information gathering and record keeping.
- 3.14.3 The Authority was keeping records covering the last 2 years in line with the Standard.

Recommendation

- 3.14.4 The Authority should:

Ensure that adequate inspection details and other information required under the relevant Food Safety Act Codes of Practice are recorded following inspections. [The Standard - 16.1]

3.15 Complaints about the Service

- 3.15.1 The Authority had a documented procedure relating to complaints against the Council. A leaflet had been produced and was available to the public and local businesses.
- 3.15.2 The auditors were informed that the Authority had no recorded complaints made against the Food Enforcement Service or its officers.

3.16 Liaison with Other Organisations

- 3.16.1 The Authority had liaison arrangements in place with officers from the food enforcement section regularly attending liaison group meetings of the Cumbria Food Liaison Group, The Northwest Shellfish Liaison Group and meetings with the Public Health Laboratory Service and local EHO's. Minutes of all the groups' recent meetings were kept on file and available to staff.

3.17 Internal Monitoring

- 3.17.1 The Authority had not set up a documented internal monitoring procedure to verify its conformance with the Standard nor in practice were monitoring procedures in place to check qualitative aspects of the service.
- 3.17.2 The BVPP and the Development and Environment Business Units Annual Reports included information on performance monitoring in relation to the Authority's performance indicators. Quantitative information regarding the numbers of food inspections carried out, enforcement actions and infectious disease numbers were produced as a departmental management quarterly report subsequently formulated into the annual performance reports. None of the monitoring or reporting formats included qualitative aspects of performance.
- 3.17.3 Monitoring other aspects of the Standard for example, record keeping or enforcement actions was done on an ad-hoc basis at the Senior Environmental Health Officer level although this was restricted to checking letters and notices. This monitoring was not effective and monitoring officers were not aware of the standards against which to check the Authority's enforcement work.

Recommendation

- 3.17.4 The Authority should:

Set up and implement documented monitoring procedures to verify its conformance with the Standard, relevant legislation and Food Safety Codes of Practice and the Authority's own documented policies and procedures. [The Standard – 19.1]

3.18 Third Party or Peer Review

3.18.1 The Authority had not been involved in any inter-authority audits or other third party reviews.

3.19 Food Safety Promotion

3.19.1 The Authority was active in this area and engaged in a wide range of activities aimed at promoting food safety. Records of its promotional activities include the following examples:

- Promotion of the Heartbeat Award Scheme, with 6 awards having been granted since July 2000.
- Participation in the North Cumbria Breathing Space Forum in conjunction with other local authorities and various health bodies. The forum included the promotion of smoke free eating areas in food premises.
- The Authority has been an active participant in the National Food Safety Week since its inception. Activities carried out included displays and exhibitions, competitions and talks to local schools.
- The Authority participated in a National Hand Washing Week, an initiative aimed at highlighting correct hand washing practices in schools and food businesses.

Auditors: Peter Burke
John Questier

Food Standards Agency
Local Authority Enforcement (Policy) Division

Action Plan for Copeland Borough Council

Audit date: 22-24 May 2001

Improvements planned	By (date)	To address (recommendation including Standard Paragraph)	Comments
Service plan April 2001 – March 2002 to be reported to Council's Executive on 18 th September 2001 and endorsed by the Full Council on 16 th October 2001	October 2001	3.1.8 Draw up, document and implement a Service Plan in accordance with the Service Planning Guidance given in Chapter 1 of the Framework Agreement. Ensure it is submitted to the relevant member forum for approval. [The Standard – 3.1]	Production of Service Plan commenced in July 2001.
Establish a procedure which will incorporate a review mechanism and cross reference with internal monitoring – see linkage to address recommendation 3.14.4.	October 2001	3.2.4 Set up a control system for all documentation relating to its enforcement activities ensuring that superseded documents are removed from use throughout the Authority. [The Standard – 4.2]	Report to go the Health Wealth and Safety Policy Development Group (PDG) 25.9.01
Review Scheme of Delegation and incorporate Council's Authorisation scheme	Sept 2001	3.3.10 (i) Review its scheme of delegation and authorisation to ensure that all officers involved in food law enforcement are properly authorised, qualified and experienced to carry out their duties under the FSA COP 19: Qualifications and Experience of Authorised Officers. [The Standard – 5.1]	Liaise with Legal Services in order that amendments are incorporated into Scheme of Delegation for review and reported by Legal Services to the Executive on 18.9.01

<p>3.2 Following reviews of authorisations identify training needs and establish training plan.</p> <p>Ensure detailed information maintained on courses attended by officers including content and duration.</p>	<p>October 2001</p> <p>July 2001</p>	<p>3.3.10 (ii) Ensure all officers involved in food law enforcement are trained in all technical and administrative aspects of the work in which they are involved and that where training is given in-house details of the content and duration of that training are maintained on file. [The Standard – 5.4]</p>	<p>Training plan should tie in with Staff Development Interviews as part of IIP.</p> <p>Action implemented.</p>
<p>Ensure copies of all authorised officers qualifications and training records are maintained.</p>	<p>August 2001</p>	<p>3.3.10 (iii) Ensure that records of relevant academic and other qualifications of training and experience are kept for all its authorised officers including those authorised officers who may not be directly involved in day to day food law enforcement. [The Standard – 5.5]</p>	
<p>In respect of equipment calibration improve the procedure to include acceptable tolerances and action to be taken when tolerances exceeded; and the need to ensure calibration before and after enforcement action.</p>	<p>August 2001</p>	<p>3.4.6 (i) Review the documented calibration procedure to include reference to ensuring calibration of the combined thermometer systems including probes and that checks on the accuracy of the measuring equipment before and after enforcement action being taken is carried out. [The Standard – 6.2]</p>	<p>Action implemented</p>

<p>Installation of software system capable of delivering information required for statutory returns, service management and planning. Until new system operational maintain manual data collection regime.</p>	<p>April 2002</p>	<p>3.4.6 (ii) Ensure that the computer software package or other method of record administration is capable of providing any information reasonably requested by the FSA. [The Standard – 6.4]</p> <p>3.9.4 Continue its manual check of its food premises database and ensure that it is accurate and up to date. [The Standard – 11.1]</p>	<p>Preparation of funding bid already in Departmental Business Plan as a key objective.</p> <p>Submission of proposal to the Executive in August 2001 so that system can be included in 2001/2002 budget.</p>
<p>Officers will be instructed in the use of centrally produced inspection forms. Use of the forms will be incorporated in the inspection procedure and linked to internal monitoring procedures.</p>	<p>July 2001</p>	<p>3.5.11(i) Ensure that the legal compliance of food premises is assessed in accordance with the legally prescribed standards. Use of centrally produced inspection forms and information collection sheets will aid this process. [The Standard – 7.4]</p>	<p>Implemented.</p>
<p>Development of procedures in respect of the process and inspection of premises approved under product specific legislation and butchers licensing.</p>	<p>Dec 2002</p>	<p>3.5.11 (ii) Extend the range of documented inspection procedures to include approved premises and licensed butchers premises amongst others. [The Standard – 7.5]</p>	<p>Procedures to be considered by Cumbria Food Liaison Group, and then incorporated by the Council into it's service delivery.</p>
<p>Review inspection techniques with authorised officers.</p>	<p>Dec 2002</p>	<p>3.5.11 (iii) Ensure that all observations made and/or data obtained during the course of inspections is recorded and stored in such a way that it is retrievable. [The Standard – 7.6]</p>	

Review the response to Food Hazard Warnings with all authorised officers.	June 2001	3.12.4. Ensure that it has a copy of, and documents its response to, all FHW's issued by the Agency. [The Standard – 14.3]	Action completed
Include as part of internal monitoring procedure consistency amongst officers of enforcement in line with Council procedures.	March 2001	3.13.11 (i) Ensure that its documented enforcement procedures are being observed by officers carrying out enforcement activity. [The Standard – 15.1]	Findings of the audit discussed with officers.
10. Provide update training for all authorised officers on the drafting and service of Improvement Notices, issue of formal cautions and other enforcement; linked with internal monitoring.	July 2001	3.13.11(ii) Ensure enforcement actions are carried out in accordance with the relevant Food Safety Act Code of Practice. [The Standard – 15.2]	Action implemented on drafting of notices. Pending on issue of formal cautions and other enforcement duties.
Provide a summary of the Enforcement Policy at every inspection; publish in Copeland Matters magazine and ensure available on the Council website.	August 2001	3.3.11 (iii) Ensure that the Enforcement Policy or a summary of it is readily available to the public and food businesses. [The Standard – 15.3]	Already available on the web; issue of Copeland Matters, corporate magazine pending.
Inspection procedures to include details required to be kept on file records; staff training on procedures; linked to internal monitoring.	June 2002	3.14.4 Ensure that adequate inspection details and other information required under the relevant Food Safety Act Code of Practice are recorded following inspections. [The Standard – 16.1]	To be used at the next programmed inspection which will result in full details being on file for high risk premises by June 2002

<p>Develop and implement quality monitoring procedures to cover all aspects of the food service.</p>	<p>April 2002</p>	<p>3.17.4 Set up and implement documented monitoring procedures to verify its conformance with the Standard, relevant legislation and Food Safety Act Codes of Practice and the Authority's own documented policies and procedures. [The Standard – 19.1]</p>	<p>To be considered by the Cumbria Food Liaison Group and implemented by the Council when available.</p>
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ANNEX A

COPELAND BOROUGH COUNCIL ENFORCEMENT ACTIVITY OFFICIAL RETURN 2000

The UK enforcement data is reported to the European Commission on a calendar year basis. Therefore the information in this Annex, and on the Agency website at www.foodstandards.gov.uk/lalist/authindex.htm, will not match the data in the main body of the report which is based on the local authority reporting year (1 April-31 March).

COPELAND BOROUGH COUNCIL – OCD NO 058

	Primary Producers	Manufacturers and Packers	Importers and Exporters	Distributors and Transporters	Retailers	Restaurant and other Caterers	Total
Number of establishments	2	31	0	8	230	871	1,142
Number of establishments inspected	1	62	0	3	92	322	480
Number of inspections	0	24	0	1	62	244	331
Number of establishments committing infringements*	0	13	0	1	17	94	125
Hygiene general (handling procedures, equipment and condition of premises)	0	0	0	0	0	0	0
Hygiene of personnel (in conformity with article 8 of the Control Directive)	0	0	0	0	0	0	0
Composition (including raw materials and additives)	0	0	0	0	0	0	0
Contamination (other than microbiological)	0	0	0	0	0	0	0
Labelling and presentation	0	0	0	0	0	0	0
Others	0	0	0	0	0	0	0

* Only the ones which have led to formal action by the competent authorities

LABORATORY RESULTS

Product	Number of samples#	Samples with infringements*				Total number of samples
		Microbiological contamination	Other contaminants	Composition	Labelling and presentation	
Dairy products	0	0	0	0	0	0
Eggs and egg products	0	0	0	0	0	0
Meat and meat products, game & poultry	0	0	0	0	0	0
Fish, crustacea and molluscs	0	0	0	0	0	0
Fats and oils	0	0	0	0	0	0
Soups, broths and sauces	0	0	0	0	0	0
Cereals and bakery products	0	0	0	0	0	0
Fruit and vegetables	0	0	0	0	0	0
Herbs and spices	0	0	0	0	0	0
Non-alcoholic drinks	0	0	0	0	0	0
Wine	0	0	0	0	0	0
Alcoholic drinks (other than wine)	0	0	0	0	0	0
Ices and desserts	0	0	0	0	0	0
Cocoa and cocoa preparations, coffee & tea	0	0	0	0	0	0
Confectionery	0	0	0	0	0	0
Nuts, nut products and snacks	0	0	0	0	0	0
Prepared dishes	0	0	0	0	0	0
Foodstuffs intended for special nutritional uses	0	0	0	0	0	0
Additives	0	0	0	0	0	0
Materials and articles intended to come into contact with foodstuffs	0	0	0	0	0	0
Others	0	0	0	0	0	0

* Only the ones which have led to formal action by the competent authorities

A few samples had more than one type of infringement on which formal action was taken

Product from which Informal Samples were taken during 2000	Number of Informal Samples which were Unsatisfactory				Total No. of Informal Samples
	Microbiological contamination	Other contamination	Composition	Labelling and Presentation	
Dairy products	20	0	0	0	52
Eggs and egg products	0	0	0	0	0
Meat and meat products, game and poultry	3	0	0	0	3
Fish, crustacea and molluscs	13	0	0	0	16
Fats and oils	0	0	0	0	0
Soups, broths and sauces	0	0	0	0	0
Cereals and bakery products	0	0	0	0	0
Fruit and vegetables	0	0	0	0	0
Herbs and spices	0	0	0	0	0
Non-alcoholic drinks	0	0	0	0	1
Wine	0	0	0	0	0
Alcoholic drinks (other than wine)	0	0	0	0	0
Ices and desserts	2	0	0	0	2
Cocoa and cocoa preparations, coffee and tea	0	0	0	0	0
Confectionery	0	0	0	0	0
Nuts, nut products and snacks	0	0	0	0	0
Prepared dishes	0	0	0	0	2
Foodstuffs intended for special nutritional uses	0	0	0	0	0
Additives	0	0	0	0	0
Materials and articles intended to come into contact with foodstuffs	0	0	0	0	16
Others	1	0	0	0	11

Glossary

Agricultural Analyst	A person, holding the prescribed qualifications, who is formally appointed by a local authority to analyse feeding stuffs samples.
Approved premises	Food manufacturing premises that has been approved by the local authority, within the context of specific legislation, and issued a unique identification code relevant in national and/or international trade.
Authorised officer	A suitably qualified officer who is authorised by the local authority to act on its behalf in, for example, the enforcement of legislation.
Best Value	<p>A Government policy which seeks to improve local government performance in the delivery of services to local communities – from education and care for the elderly through to environmental health and road maintenance. Best Value aims to ensure that the cost and quality of these services are of a level acceptable to local people by:</p> <ul style="list-style-type: none"> • increasing the role of local people in deciding the priorities for local government services • improving the way authorities manage and review their business • building on the experience and expertise of staff.
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.
County Council	A local authority whose geographical area corresponds to the county and whose responsibilities include food standards and feeding stuffs enforcement.
District Council	A local authority of a smaller geographic area and situated within a County Council whose responsibilities include food hygiene enforcement.
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.
Feeding stuffs	Term used in legislation on 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.
Metropolitan Authority	A local authority normally associated with a large urban conurbation in which the County and District Council functions are combined.
Minded to notice	A notice served by an Authorised Officer of the local authority under the Deregulation (Improvement and Enforcement Procedures) (Food Safety Act 1990) Order 1996. This notice is served prior to an 'improvement notice' and gives food business proprietors a specified period to make either a written or oral representation to the enforcement authority about the enforcement action. A repeal to the above Order means that from 10 April 2001 'minded to notices' no longer need to be issued prior to the issue of an 'improvement notice'.
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 premises should be inspected at least every 6 months.
Service Plan	A document produced by a local authority setting out their plans on providing and delivering a food service to the local community.
Trading Standards	The Department within a local authority which carries out, amongst other responsibilities, the enforcement of food standards and feeding stuffs legislation.
Trading Standards Officer (TSO)	Officer employed by the local authority who, amongst other responsibilities, may enforce food standards and feeding stuffs legislation.

Unitary Authority

A local authority in which the County and District Council functions are combined, examples being Metropolitan District/Borough Councils, and London Boroughs. A Unitary Authority's responsibilities will include food hygiene, food standards and feeding stuffs enforcement.