

Report on the Audit of Local Authority Food Law Service Delivery and Food Business Compliance

Waverley Borough Council
25-27 June 2013



Foreword

Audits of local authorities feed and food law enforcement services are part of the Food Standards Agency's arrangements to improve consumer protection and confidence in relation to food and feed. These arrangements recognise that the enforcement of UK food and feed 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 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 database management, inspections of food businesses and internal monitoring. 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 Official Feed and Food Controls by Local Authorities and is available on the Agency's website at: www.food.gov.uk/enforcement/auditandmonitoring.

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, standards and feeding stuffs. Parallel local authority audit schemes are implemented by the Agency's offices in all the devolved countries comprising the UK.

The report contains some statistical data, for example on the number of food premises inspections carried out annually. The Agency's website contains enforcement activity data for all UK local authorities and can be found at: www.food.gov.uk/enforcement/auditandmonitoring.

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

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1.0 Introduction

- 1.1 This report records the results of an audit at Waverley Borough Council with regard to food hygiene enforcement, under relevant headings of the Food Standards Agency Food Law Enforcement Standard. The audit focused on the Authority's arrangements for the management of the food premises database, food premises interventions, and internal monitoring. The report has been made available on the Agency's website at: www.food.gov.uk/enforcement/auditandmonitoring/auditreports. Hard copies are available from the Food Standards Agency's Operations Assurance Division at Aviation House, 125 Kingsway, London WC2B 6NH, Tel: 020 7276 8428.

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 and the Official Feed and Food Controls (England) Regulations 2009. This audit of Waverley Borough Council was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme.
- 1.3 Regulation (EC) No. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law includes a requirement for competent authorities to carry out internal audits or to have external audits carried out. The purpose of these audits is to verify whether official controls relating to feed and food law are effectively implemented. To fulfil this requirement, the Food Standards Agency, as the central competent authority for feed and food law in the UK has established external audit arrangements. In developing these, the Agency has taken account of the European Commission guidance on how such audits should be conducted.¹
- 1.4 The Authority was selected for inclusion in the Food Standards Agency's programme of audits of local authority food law enforcement services because it had not been audited in the past five years by the Agency, and was representative of a geographical mix of five local authorities selected across England.

¹ Commission Decision of 29 September 2006 setting out the guidelines laying down criteria for the conduct of audits under Regulation (EC) No. 882/2004 of the European Parliament and of the Council on official controls to verify compliance with feed and food law, animal health and animal welfare rules (2006/677/EC).

Scope of the Audit

- 1.5 The audit examined Waverley Borough Council's arrangements for food premises database management, food premises interventions and internal monitoring, with regard to food hygiene law enforcement. This included a reality check at a food business to assess the effectiveness of official controls implemented by the Authority at the food business premises and, more specifically, the checks carried out by the Authority's officers, to verify food business operator (FBO) compliance with legislative requirements. The scope of the audit also included an assessment of the Authority's overall organisation and management, and the internal monitoring of food hygiene law enforcement activities.
- 1.6 Assurance was sought that key Authority food hygiene law enforcement systems and arrangements were effective in supporting business compliance, and that local enforcement was managed and delivered effectively. The on-site element of the audit took place at the Authority's Civic Offices, The Burys, Godalming, Surrey on 25-27 June 2013.

Background

- 1.7 Waverley Borough Council is located in South West Surrey bordering Hampshire and West Sussex covering 34,517 hectares. The Borough has a population of approximately 121,600 which is primarily based in Godalming, Farnham, Haslemere and Cranleigh. The Borough is a key commuter area for London and outer London.
- 1.8 The population enjoys a relatively good level of health with higher than average life expectancy than in England as a whole. In a recent survey people in the Borough were found to enjoy the best overall quality of life in the country.
- 1.9 Food hygiene law enforcement was the responsibility of the Food, Health and Safety Team of the Environmental Health Team within Environmental Services. The Service reported to elected members via the Community Overview and Scrutiny Committee. Specialist services for food examination were provided by Public Health England Food, Water and Microbiological Services and also Wiltshire and Hampshire Scientific Services. The Environmental Health Manager held specialist responsibility for food safety.

1.10 The Authority reported the profile of Waverley Borough Council's food businesses at 31 March 2013 as follows:

Type of Food Premises	Number
Primary Producers	1
Manufacturers/Packers	16
Importers/Exporters	2
Distributors/Transporters	12
Retailers	194
Restaurant/Caterers	876
Total Number of Food Premises	1,101

2.0 Executive Summary

2.1 Waverley Borough Council was selected for audit as it had not been previously audited by the Agency in the past five years. The Authority was generally able to demonstrate that it had a risk-based approach to its interventions programme, supported food business compliance and was found to be in broad conformance with the Standard in the Framework Agreement in the areas subject to audit.

2.2 Strengths:

Organisation and management: Officers reported on performance to the Corporate Management Team and Portfolio Holder through monthly and quarterly performance reports. Environmental Health weekly risk reports detailing cases and issues of interest were reported to the Corporate Management Team and incorporated a helpful risk-based traffic lights monitoring system.

Third party and peer review: The Authority had participated in a robust inter-authority audit exercise in June 2011 which focused on certain paragraphs of the Standard in the Framework Agreement. An action plan which highlighted areas for improvement had been fully implemented by the Authority.

Reactive work: Record checks on food and food premises complaint investigations and follow-up on unsatisfactory sample results confirmed that appropriate follow-up action had been taken in all cases examined and comprehensive records of investigations had been maintained.

2.3 Key areas for improvement:

Officer authorisations: A procedure for the authorisation and competency of officers provided that authorisations were assigned on the basis of qualifications, experience and competence. Authorisations however required review to ensure officers are appropriately authorised under current legislation.

3.0 Audit Findings

3.1 Organisations and Management

Strategic Framework, Policy and Service Planning

3.1.1 The Authority had developed and implemented a comprehensive Food Safety Service Plan for 2013/14 which had been appropriately approved by the Corporate Management Team. The Plan was well structured and based on the Service Planning Guidance in the Framework Agreement. The Plan set out the staffing resources allocated to the Service, however it did not include a clear assessment of staffing levels required to meet all the demands on the Service. It was agreed that this would be addressed when developing the 2014/15 Food Enforcement Service Plan.

3.1.2 The Service Plan set out the links to the Corporate Vision and priorities focussed on VALUE:

- Value for money
- Affordable Housing
- Leisure and Lives
- Understanding residents needs
- Environment.

Recommendation

3.1.3 The Authority should:

Ensure that future Food Service Plans include an accurate and clear comparison of the resources required to carry out the full range of statutory food law enforcement activities against a reasoned estimate of the resources available to the Service. [The Standard – 3.1]

Documented Policies and Procedures

3.1.4 The Authority subscribed to an internet based regulatory information and management system which included the provision of a range of standard procedures with appropriate updates. These were supplemented by a number of local procedures which had been developed and implemented by the Authority.

- 3.1.5 Documented policies were available for all the areas covered by the Standard in the Framework Agreement. The procedures covered almost all food law enforcement activities and reflected current legislation and centrally issued guidance.

Officer Authorisations

- 3.1.6 The Authority had recently developed a procedure for the authorisation of officers within the Environmental Health Team which included a competency framework. The procedure confirmed that officers were to be authorised in accordance with their job title/role and competencies. The Authority had recently carried out documented assessments of officer competency which took account of qualifications, training and experience.
- 3.1.7 Officer authorisation documents generally contained references to relevant food hygiene legislation in accordance with the Food Law Code of Practice (FLCoP), but required further review in regard to the General Food Regulations 2004, the Official Feed and Food Controls (England) Regulations 2009 and the Trade in Animal Related Products Regulations 2011. A number of officers previously approved by the Agency for enforcement of the Food and Environment Protection Act 1985 had now left the employment of the Authority. The Service needed to contact the Agency to update these authorisations.
- 3.1.8 Checks on a selection of officers' qualification and training records confirmed that officers were appropriately qualified and were provided with a range of training to ensure they were receiving the minimum 10 hours relevant training per annum based on the principles of continuing professional development. Training for some officers on imported foods was planned for later in the year to meet an identified training need.

Recommendation

3.1.9 The Authority should:

Review and update authorisations to ensure that all officers are appropriately authorised under current relevant legislation in accordance with their levels of qualification, experience and competency. [The Standard – 5.3]

3.2 Food Premises Database

- 3.2.1 The Service operated a computer database system that was capable of providing the returns required for the Agency's Local Authority Enforcement Monitoring System (LAEMS). Systems were in place for backing up and maintaining the security of the electronic database.
- 3.2.2 A documented procedure for the maintenance of the food database detailed a number of actions to ensure the database was updated and accurate. These included:
- Reviewing planning application lists
 - Random checks utilising commercial directory listings
 - Officers knowledge of their area
 - Routine data entry checks by the Systems Administrator.
- 3.2.3 The Service demonstrated its ability to provide a range of detailed and useful reports from its database required for the effective management of its intervention programme.
- 3.2.4 Pre audit checks on six local businesses found that all were appropriately listed on the Authority's database and included within the Authority's interventions programme. Further reports and checks carried out during the audit, including internet searches, also confirmed that the data held was generally accurate.
- 3.2.5 One report produced for the audit on unrated premises confirmed that a small number of these premises actually had been allocated a risk rating. It was unclear as to the reasons for the incorrect risk ratings. A review of unrated premises would assist the Authority in improving the accuracy of the database and LAEMS returns.

Recommendation

3.2.6 The Authority should:

Review the procedure for the maintenance of the database to ensure that all unrated premises and risk ratings are accurate. [The Standard – 11.2]

3.3 Food Premises Interventions

3.3.1 The Authority provided a breakdown of food businesses in the area in the following risk categories:

Premises Risk Category	Number of Premises
A	2
B	43
C	377
D	188
E	417
Unrated	74
Outside programme	0
TOTAL	1,101

3.3.2 The Authority's Food Service Plan set out the food hygiene inspection programme for 2013/14 as follows:

Premises Risk Category	Number of Inspections Due
A	2
B	33
C	200
D	80
E	128
Total	443

3.3.3 The Plan also set out the priorities for the inspection programme. Category A, B and non compliant C premises would receive a full food hygiene inspection and compliant C, D and E rated establishments would be subject to a mix of inspections and alternate interventions in line with the flexibilities provided within the FLCoP. Examination of the database found that the Authority was generally carrying out interventions at the minimum intervals required by the Code and newly registered businesses were integrated into the interventions programme. A report ran at the time of the audit confirmed there were nineteen overdue premises inspections and these included seven category C premises, one category D and 10 category E rated. There were no overdue category A or B premises inspections.

3.3.4 Documented procedures were in place for general and approved establishment inspections. Records of inspections carried out by different officers at food businesses were checked during the audit. There was evidence that officers were assessing businesses against all relevant legislation, including an assessment of HACCP requirements at each inspection. The Authority had also taken specific action to implement E.coli O157 cross-contamination

guidance including a specific project to assess compliance by retail butchers and also subsidised Retail Butchers Training encompassing the new guidance. Risk ratings had been allocated in accordance with centrally issued guidance and were generally appropriate given the inspection findings. Database records were up to date and accurate.

- 3.3.5 Checks on aides-memoire and records demonstrated that detailed inspections and interventions were being carried out with clear recording of actions and contraventions. Officers clearly identified any breaches of relevant legislation and appropriate revisits and follow-up action was generally undertaken. Auditors discussed the benefits of expanding the general premises aide-memoire in line with the updated butchers aide-memoire to facilitate detailed and consistent officer recording of compliance such as with HACCP requirements.

Good Practice – Prompt Boxes

Aides-memoire for inspection included 'prompt boxes' for officers to record information such as activities in progress at the time of the inspection, changes/improvements since the last visit, follow-up action required and priorities for next programmed inspection.

- 3.3.6 The Authority had two establishments approved under Regulation (EC) No. 853/2004. The files contained the information required to assess whether the premises required approval and checks on one file confirmed that the establishment had been approved under the relevant legislation. However auditors discussed reissuing the approval document for one establishment to ensure all approved activities were included in the approval document together with the approval number. Auditors discussed the development of a file synopsis sheet to summarise the activities at the establishment.

Verification Visit to a Food Premises

- 3.3.7 A verification visit was undertaken to a public house with the officer who had carried out the last food hygiene inspection of the premises. The main objective of the visit was to assess the effectiveness of the Authority's assessment of food business compliance with food law requirements.
- 3.3.8 On the visit the officer was able to demonstrate good familiarity with the premises and had a good understanding of the key operations carried out at the business and had appropriately assessed compliance of the business with legal requirements. Issues that had been previously identified by the officer were being followed up with the FBO.

3.4 Enforcement

- 3.4.1 An Environmental Health Service Enforcement Policy had been approved by the Council in 2012. The policy generally reflected a graduated approach to enforcement and contained guidance on enforcement actions in accordance with the FLCoP. A range of documented enforcement procedures were also available to provide guidance for officers. Whilst there was some prosecution documentation, this should be further expanded into a procedure to provide comprehensive operational guidance for officers on taking prosecutions.
- 3.4.2 File checks were carried out on records of five hygiene improvement notices, a voluntary closure and a voluntary surrender. These enforcement actions were all found to be appropriate for the circumstances and were generally in line with the requirements of the FLCoP.
- 3.4.3 Records for one prosecution were examined. Detailed records and evidence had been retained on file and confirmed that actions had been taken in accordance with the Authority's Enforcement Policy and in line with centrally issued guidance.

3.5 Internal Monitoring, Third Party or Peer Review

Internal Monitoring

- 3.5.1 The Authority set out a range of mechanisms for internal monitoring across all areas of food law enforcement activities in the Food Safety Service Plan. A new documented procedure had been recently introduced and there was evidence of regular quantitative and qualitative internal monitoring through one to one and team meetings, cascade training for consistency, and a range of checks incorporated into procedures such as checks on the content and service of notices and monitoring of interventions and reactive work. Accompanied intervention monitoring was also being introduced. The Service produced monthly and quarterly performance reports for the Corporate Management Team and Portfolio Holder and also Environmental Health Weekly Risk Reports detailing cases and issues of interest which utilised a traffic lights monitoring system. These included matters such as Primary Authority, food hygiene training courses, and food inspections.

Good Practice – Weekly Risk Reports

Each week the Corporate Management Team received Environmental Health Weekly Risk Reports which incorporated a traffic lights monitoring system. These included matters such as Primary Authority, food hygiene training courses, and food inspections.

Food and Food Premises Complaints

- 3.5.2 The Authority had a Food and Food Premises Complaints policy which set out the purpose, scope, resources, criteria, timescales, and process for the investigation of complaints. The Service also had a documented procedure for the investigation of food premises and food hygiene complaints.
- 3.5.3 Checks made on five records for food and food premises complaints confirmed that officers had carried out timely and appropriate investigations. Comprehensive records of investigations had been maintained and all interested parties were informed of progress of the investigation.

Food Inspection and Sampling

3.5.4 The Authority had developed a sampling policy, which included its overall approach and also its specific approach to sampling at businesses with Primary Authority agreements with other local authorities, nationally co-ordinated sampling programmes, complaints, inspections and special investigations. A food sampling programme was being implemented which included Surrey Food Liaison Group and other co-ordinated food sampling work. File checks confirmed that samples had been taken in accordance with the Authority's sampling policy. The samples had been taken by a trained authorised officer and appropriate follow-up action had been taken in all cases based on the results.

Records

3.5.5 Most records of food law enforcement activities were stored on a paperless computerised management system. Records across the range of food law enforcement activities were generally easily retrievable and comprehensive.

Third Party or Peer Review

3.5.6 The Authority had participated in a Surrey Environmental Health Managers' Group food safety third party inter-authority audit exercise in June 2011. The Authority was subject to a one day partial audit covering certain paragraphs of the Standard in the Framework Agreement.

3.5.7 The inter-authority audit identified a number of recommendations for the Authority to address. An Authority action plan dated October 2011 highlighted areas for improvement and the Authority had completed all actions.

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ANNEX A Action Plan for Waverley Borough Council

Audit date: 25-27 June 2013

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.1.3 Ensure that future Food Service Plans include an accurate and clear comparison of the resources required to carry out the full range of statutory food law enforcement activities against a reasoned estimate of the resources available to the Service. [The Standard – 3.1]</p>	<p>31/03/14</p>	<p>To include an accurate and clear comparison of the resources required to carry out the full range of statutory food law enforcement activities against a reasoned estimate of the resources available to the Service in the Service Plan for 2014/15.</p>	<p>Details to be included in Service Plan 2014/15 being considered.</p>
<p>3.1.9 Review and update authorisations to ensure that all officers are appropriately authorised under current relevant legislation in accordance with their levels of qualification, experience and competency. [The Standard – 5.3]</p>	<p>31/03/14</p>	<p>Review to be undertaken with regard to the General Food Regulations 2004, the Official Feed and Food Controls (England) Regulations 2009 and the Trade in Animal Related Products Regulations 2011.</p> <p>Request to be made to update the authorisations for Food and Environment Protection Act 1985 to the Food Standards Agency.</p>	<p>Request made for Best Practice guidance from the Food Standards Agency.</p> <p>Request made to update the authorisations for Food and Environment Protection Act 1985 to the Food Standards Agency.</p>
<p>3.2.6 Review the procedure for the maintenance of the database to ensure that all unrated premises and risk ratings are accurate. [The Standard – 11.2]</p>	<p>31/12/13</p>	<p>Undertake a review of the procedure for the maintenance of the database to ensure that all unrated premises and risk ratings are accurate.</p>	<p>Database reports being run and checks being carried out. Review of procedure being undertaken.</p>

ANNEX B Audit Approach/Methodology

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

(1) Examination of LA policies and procedures.

The following relevant LA policies, procedures and linked documents were examined before and during the audit:

- Food Safety Enforcement Plan 2013/14
- Environmental Health Service Enforcement Policy 2012
- Food Sampling Policy
- Complaints Policy
- Team Meeting Agendas and Minutes
- Council Minutes
- Authorisation of Officers Procedure
- Approved Premises Interventions Procedure
- Premises Interventions & Revisits Procedure
- Investigations of Complaints Procedure
- Internal Monitoring Procedure
- Maintenance of Food Database Procedure
- Food Sampling Procedure
- Environmental Hygiene Sampling Procedure
- Service of Notices Procedure
- Simple Cautions Procedure
- Food Premises Inspection procedure and aide-memoire
- Inter-Authority Audit Report 2011
- Officer authorisation, training and qualification records.

(2) File reviews – the following LA file records were reviewed during the audit:

- General food premises inspection records
- Approved establishment records
- Food complaint records
- Food sampling records
- Formal enforcement records.

(3) Review of database records:

- To review and assess the completeness of database records of food hygiene inspections, food and food premises complaint investigations, samples taken by the authority, formal enforcement and other activities and to verify consistency with file records.
- To assess the completeness and accuracy of the food premises database.

- To assess the capability of the system to generate food law enforcement activity reports and the monitoring information required by the Food Standards Agency.

(4) Officer interviews – the following officers were interviewed:

- Environmental Health Manager
- Environmental Health Officer.

Opinions and views raised during officer interviews remain confidential and are not referred to directly within the report.

(5) On-site verification check:

A verification visit was made with the Authority's officers to a local food business. The purpose of the visit was to verify the outcome of the last inspection carried out by the Local Authority and to assess the extent to which enforcement activities and decisions met the requirements of relevant legislation, the Food Law Code of Practice and official guidance, having particular regard to LA checks on FBO compliance with HACCP based food management systems.

ANNEX C Glossary

Authorised officer	A suitably qualified officer who is authorised by the local authority to act on its behalf in, for example, the enforcement of legislation.
Broadly Compliant	An outcome measure which the Food Standard Agency has developed with local authorities to monitor the effectiveness of the regulatory service relating to food law. It is based on the risk rating scheme in the Food Law Code of Practice which is currently used by food law enforcement officers to assess premises which pose the greatest risk to consumers failing to comply with food law.
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 geographical area and situated within a County Council whose responsibilities include food hygiene enforcement.
E.coli O157	E.coli O157 belongs to the group of verotoxigenic E.coli (VTEC) bacteria which are a toxin-producing strain of Escherichia coli that occur naturally in the gastrointestinal tract of animals such as cattle and sheep, and are pathogenic to humans. E.coli O157 is the VTEC strain that has been most commonly implicated in human infection in the UK.
Enhanced Remote Transit Shed	A warehouse designated by HM Revenue and Customs (HMRC), where goods are temporarily stored pending clearance by HMRC, and prior to release into free circulation.
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 hygiene	The legal requirements covering the safety and wholesomeness of food.

Food Hygiene Rating Scheme (FHRS)	The Food Hygiene Rating Scheme provides information to the public about hygiene standards in catering and retail food establishments. It is run by local authorities in partnership with the Food Standards Agency. Businesses that fall within the scope of the scheme are given a ‘hygiene rating’ which shows how closely the business was meeting the requirements of food hygiene law at the time of inspection. The scheme also encourages businesses to improve hygiene standards.
Food Safety Management System	A written permanent procedure, or procedures, based on HACCP principles. It is structured so that this requirement can be applied flexibly and proportionately according to the size and nature of the food business.
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 and Feed 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 and feed law enforcement.</p> <p>The Monitoring Scheme requires local authorities to submit yearly returns via LAEMS to the Agency on their food enforcement activities i.e. numbers of inspections, samples and prosecutions.</p> <p>Under the Audit Scheme the Food Standards Agency will be conducting audits of the food and feed law enforcement services of local authorities against the criteria set out in the Standard.</p>
Full Time 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 and feed enforcement.

HACCP	Hazard Analysis and 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.
LAEMS	Local Authority Enforcement Monitoring System is an electronic system used by local authorities to report their food law enforcement activities to the Food Standards Agency.
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.
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 six months.
Safer food, better business (SFBB)	A food safety management system, developed by the Food Standards Agency to help small catering and retail businesses put in place food safety management procedures and comply with food hygiene regulations.
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.