



FOOD
STANDARDS
AGENCY

SCOTLAND

Buidheann
Inbhe-Bidhe
an Alba

**FRAMEWORK AGREEMENT
ON
LOCAL AUTHORITY
FOOD LAW ENFORCEMENT**

**Food Law Enforcement
Audit Branch Scotland**

End of Year 3 Report

JULY 2004

CONTENTS

INTRODUCTION	2
Background	2
Audit Approach	3
Publication of Audit Reports	5
Feedback from Local Authorities on the Audit Process	5
Actions on Audit Outcomes	5
YEAR 3 AUDIT FINDINGS	7
Organisation and Management (3)	7
Review and Updating of Documented Policies and Procedures (4)	8
Facilities and Equipment (6)	8
Food and Feeding stuffs Premises Inspections (7) – Feeding stuffs	9
Feeding stuffs Complaints (8)	9
Home Authority Principle (9)	9
Advice to Business (10)	10
Food and Feeding stuffs Inspection and Sampling (12) – Feeding stuffs	10
Control and Investigation of Outbreaks and Food Related Infectious Disease (13)	10
Food Safety Incidents (14)	10
Enforcement (15)	11
Records and Inspection Reports (16)	11
Complaints about the Service (17)	11
Liaison with other Organisations (18)	12
Internal Monitoring (19)	12
Third Party or Peer Review (20)	12
Food and Feeding stuffs Safety and Standards Promotion (21)	12
AUDIT ON THE CONTROLS OF FOOD NOT OF ANIMAL ORIGIN	14
CONCLUSION	15
FUTURE AUDIT PROGRAMME	16
ANNEX 1 – Audit Advisory Committee Questionnaire	16
ANNEX 2 – Sections of The Standard - Year 3	23
ANNEX 3 – Summary of Non Conformances Raised	25

INTRODUCTION

1.1 This report summarises the findings of the Food Standards Agency Scotland's third year programme of Local Authority Food Law Enforcement audits. Audits against The Standard¹ were carried out on all 32 Scottish Local Authorities during the period April 2003 – March 2004. Once again Local Authority co-operation with the Food Standards Agency and the audit process has been greatly appreciated.

BACKGROUND

1.2 The Food Standards Agency has the power to audit Local Authorities under the Food Standards Act 1999. Such audits are a key mechanism by which the Agency can contribute to the improvement of national food safety standards by improving the effectiveness of Local Authority performance.

1.3 Local Authority performance is audited against The Standard, which forms part of the Framework Agreement on Local Authority Food Law Enforcement. The full audit examines the Local Authority's food law enforcement service and includes an assessment of the local arrangements in place for inspections of food businesses and foodstuffs; sampling and analysis; internal management; food safety promotion and educational activities.

1.4 Local needs and priorities result in considerable diversity in the way and manner in which Local Authorities provide their food enforcement services. This is recognised by the Agency and taken into account in the audit process.

¹ The *Standard* is detailed in the Framework Agreement on Local Authority Food Law Enforcement available on the FSA website at <http://www.food.gov.uk>.

AUDIT APPROACH

- 1.5 The Food Standards Agency Scotland, Food Law Enforcement Audit Branch, manages the audit activity in Scotland and ensures effective linkages between that activity and the audit activity of Local Authority Enforcement Division of the Food Standards Agency Headquarters as well as our Northern Ireland and Wales offices.
- 1.6 The Branch has responsibility for the analysis of audit information, assessment of its implications for policy decisions, and the public presentation of enforcement performance information.
- 1.7 The Audit Branch in Scotland was established in April 2001 and a timescale for the production of audit procedures was agreed. Protocols and checklists, which are subject to continual review, were approved by the Food Standards Agency Scotland Management Team. A three-year audit commenced in June 2001.
- 1.8 The programme for Year 3 of the audit process commenced in April 2003. The aim was to audit all 32 Local Authorities in Scotland against specific areas of The Standard by March 2004. This timescale was met. A list of the Authorities and the areas of The Standard against which they were audited is appended (Annex 2).
- 1.9 The Audit Branch was responsible for drawing up an annual plan of the Local Authorities to be audited during the above period. The programme was announced on a quarterly basis, 3 months in advance of the proposed audit dates, and the relevant Local Authorities and appropriate bodies notified.
- 1.10 All Local Authorities received prior notice of the audit. The Chief Executive of the Local Authority and the Chief Officer with food safety responsibility, were notified, by letter at least three months in advance of the audit date. This letter provided background information on the arrangements and nature of the audit. Accompanying the notification was a Pre-Visit Questionnaire (PVQ).

- 1.11 The PVQ was designed to obtain information about the Authority's Service Plan, reviews, policies, procedures, enforcement staff and other service information that would facilitate the audit. Local Authorities were required to complete and return the PVQ enclosing copies of supporting documentation 30 working days prior to the audit.
- 1.12 The onsite audits were carried out by two qualified Auditors and audit protocols and associated checklists provided the detailed framework for the on site audit.
- 1.13 Information provided is reviewed against the audit protocols and a draft on site programme is drawn up. Checklists were completed during the course of the audit, noting any non-conformance against The Standard, Food Safety Act 1990 Codes of Practice and other centrally issued guidance. Auditors ensured that the Audit Liaison Officer was regularly briefed on any non-conformance found.
- 1.14 At the end of the audit visit, the Auditors held a closing meeting with the Head of the Food Service and any other interested parties invited by the Authority to provide a summary of their initial findings. This closing meeting also provided an opportunity to clarify any points of misunderstanding. In this way the Auditors were able to help ensure that the Local Authority had confidence in the audit findings. A written executive summary was left with the Authority at the close of the on site audit.
- 1.15 The Auditors then produced a draft audit report, which was cleared by the Agency's Assistant Director Science and Enforcement, and sent to the Chief Officer of the Local Authority within 20 working days. This timescale was part of the performance measurement for the Audit Branch.

1.16 The Local Authority then had 20 working days to identify any factual errors and to return the report to the Agency with a draft action plan to address any non-conformances. Action plans and timescales for addressing the non-conformances were agreed and the final report was sent to the Chief Executive of the Local Authority within 10 working days.

PUBLICATION OF AUDIT REPORTS

1.17 Audit reports and agreed action plans were placed on the Agency's website.

FEEDBACK FROM LOCAL AUTHORITIES ON THE AUDIT PROCESS

1.18 The Audit Advisory Committee Scotland² carried out an independent survey of the Agency's, year 2 and 3 audit process in Scotland. All 32 Scottish Local Authorities were issued with a questionnaire (Annex 1) asking for feedback on the various aspects of the audit process. The Committee will collate and publish the results of this survey in Autumn of this year.

1.19 The Agency has received a number of positive comments from Local Authorities about the conduct of the Auditors and the way the audits were carried out.

ACTIONS ON AUDIT OUTCOMES

1.20 Audit non-conformances are addressed through individual Local Authority action plans, which are monitored by the Agency to ensure implementation. On site verification is also carried out to determine progress or to formally close the audit file, usually during the Authority's next programmed audit.

² The Audit Advisory Committee Scotland was established as an independent group to advise the Agency on matters relating to the audit process and the Framework Agreement.

1.21 Follow-up contact to ascertain how the Authorities are progressing with their action plans for year 3 has indicated good progress and to date 21 of the 32 action plans have been completed and the related year 3 audit files formally closed.

1.22 Auditors actively seek feedback from the Authority's staff during the audit, on any issues the Authority wishes to bring to the attention of the Agency, either for action or future consideration.

YEAR 3 AUDIT FINDINGS

2.1 The findings from the 32 year 3 audits carried out in the period April 2003 – March 2004 have been collated and are summarised below under the specific headings of The Framework Agreement on Local Authority Food Law Enforcement. (A breakdown of the numbers of non-conformances identified against each area of The Standard is shown in Annex 3).

Organisation and Management (The Standard 3)

2.2 Service Delivery Plans were examined in all Authorities this year. The Standard requires a performance review to be carried out at least once a year based on the Service Delivery Plan and submitted for approval by the appropriate body. Any variance in meeting the Service Delivery Plan should be addressed in the subsequent years service arrangements.

2.3 Most Plans were generally in line with the service planning guidance contained within the Framework Agreement on Local Authority Food Law Enforcement. However, 11 Authorities received a non-conformance under this section of The Standard. Some non-conformances were because performance reviews had not been conducted, or had been conducted but not submitted for approval. Others were because Service Plans did not fully reflect the service planning guidance.

2.4 In some cases Local Authorities that had satisfactory Service Plans at previous audits received a non-conformance because their Service Plans no longer reflected the service planning guidance.

Review and Updating of Documented Policies and Procedures (The Standard 4)

- 2.5 16 Authorities were audited against this area of The Standard, of which 3 received a non-conformance.
- 2.6 All Authorities had set up a system for controlling documentation in use at the Authority. Failings in this area were generally due to these procedures not being fully implemented.
- 2.7 In some cases out of date documentation was still in use and/or amendments to documentation had not been carried out in accordance with the Authority's procedures.
- 2.8 All Authorities audited had made available appropriate legislation and guidance to all relevant staff.

Facilities and Equipment (The Standard 6)

- 2.9 All 16 Authorities audited against this area of The Standard had made available the necessary equipment to permit all activities associated with the Service to be carried out. 15 Authorities audited had a documented procedure for ensuring that all relevant equipment is properly maintained and calibrated.
- 2.10 However, 11 of these Authorities received a non-conformance in relation to this section. The reasons included the procedure not being fully implemented, not including all equipment currently in use by the Authority, and not detailing the procedure for removing equipment from service when found to be defective. In some cases calibration records were incomplete.
- 2.11 Although section 11 of the Standard (Food and Feeding stuffs Premises Database) was not part of the Year 3 programme, the year 3 audit did include an examination of data from Local Authority databases and data in Service Delivery Plans. In some cases inaccuracies were identified that could have affected the reliability of information required by the Agency.

Food and Feeding stuffs Premises Inspections (The Standard 7) – Feeding stuffs

2.12 24 Authorities were audited in relation to feeding stuffs enforcement. However as the Food Standards Agency has yet to issue comprehensive guidance on feeding stuffs enforcement, this area was approached informally on the basis of identifying what progress Authorities had made.

2.13 In most cases Local Authorities had risk-based feeding stuffs inspection programmes in place and appeared to be addressing their feeding stuffs enforcement responsibilities.

Feeding stuffs Complaints (The Standard 8)

2.14 24 Authorities were audited against this area of the Standard. All had documented procedures that covered feeding stuffs complaints. In the few cases where feeding stuffs complaints had been received, appropriate action had been taken.

Home Authority Principle (The Standard 9)

2.15 8 Authorities were audited against this area of The Standard. While most did not have any formal written Home Authority agreements in place in relation to food safety or standards, they nonetheless acted as Home or Originating Authority to appropriate businesses in their area.

2.16 From records examined, most Authorities appeared to implement the Home Authority Principle to a reasonable degree. Many had also registered a number of businesses for which they acted as Home Authority or Originating Authority on the Local Authority Co-ordinators of Regulatory Services (LACORS) Home Authority database.

Advice to Business (The Standard 10)

2.17 All of the 8 Authorities audited against this area of The Standard were particularly active in providing local businesses with advice and guidance on compliance with legislation, making recommendations of good practice, undertaking promotional activities or actively encouraging or participating in the training of food handlers.

Food and Feeding stuffs Inspection and Sampling (*The Standard 12*) – Feeding stuffs

2.18 The Authorities that had feeding stuffs sampling programmes in place generally took samples in the winter months when feeding stuffs were in use. The extent of feeding stuffs sampling activity generally reflected the nature of the Local Authority with predominantly rural Authorities generally having more extensive programmes than more urban Authorities.

Control and Investigation of Outbreaks and Food Related Infectious Disease (The Standard 13)

2.19 All 8 Authorities audited against this area of The Standard had appropriate procedures in place for dealing with the control of outbreaks of food related infectious disease and the investigation of notifications of food related infectious disease.

2.20 5 Authorities received a non-conformance against this area generally due to Outbreak Control Plans, which were produced in conjunction with other relevant organisations, not being updated within relevant timescales.

Food Safety Incidents (The Standard 14)

2.21 All 8 Authorities audited had a documented procedure to ensure that food hazard warnings are dealt with in line with Code of Practice No. 16 (Revised): Enforcement of the Food Safety Act 1990 in relation to the Food Hazard Warning

System (Revised August 1997). All Authorities had notified the Food Standards Agency of their out of hours contact arrangements.

2.22 Failings in this area included not documenting responses and/or outcomes of all Food Hazard Warnings issued by the Food Standards Agency.

2.23 New Food Hazard Warnings are sequentially numbered, regardless of category and it is therefore obvious to the Authority if one has been missed. However it was noted during audit that there is no way of knowing if an update to a previous Food Hazard Warning has been missed as the numbering refers to the original Food Hazard Warning which may have been issued the previous year. This issue has been referred to the Food Law Enforcement Branch of the Agency in Scotland for action.

Enforcement (The Standard 15)

2.24 All 32 Authorities had a documented Enforcement Policy in place.

Records and Inspection Reports (The Standard 16)

2.25 8 Authorities were audited against this area of the Standard. In general records were maintained in accordance with the Authorities procedures.

Complaints About the Service (The Standard 17)

2.26 All 24 Authorities audited in this area had corporate complaints procedures in place for dealing with complaints made against their Service.

2.27 In general very few complaints had been made against food and feeding stuffs enforcement services and those few that had been made had been investigated in line with the Authorities complaints procedure and appropriate records maintained.

Liaison with Other Organisations (The Standard 18)

2.28 All 32 Authorities audited had arrangements in place with appropriate bodies, e.g. local food liaison groups, aimed at facilitating consistent enforcement.

Internal Monitoring (The Standard 19)

2.29 8 Authorities were audited against this area of The Standard. While all had documented monitoring procedures in place, 5 had not been fully implemented. This lack of effective internal monitoring could have had an impact on whether other activities were carried out in accordance with Codes of Practice and centrally issued guidance.

2.30 Many of the non-conformances that were revealed during the course of the audits could have been avoided by the proper implementation of these internal monitoring procedures.

Third Party or Peer Review (The Standard 20)

2.30 While Scottish Authorities do not take part in any peer review process against the Standard many Authorities are part of benchmarking groups which cover a range of subjects which includes food law enforcement. Some Authorities have also been subject to audit by their external accreditation bodies.

2.31 Scottish Local Authorities are all subject to audit by Audit Scotland who set performance indicators for the number of establishments in each of three risk categories requiring food hygiene inspections during the year, and the percentage of inspections which were undertaken within the prescribed period.

Food and Feeding stuffs Safety and Standards Promotion (The Standard 21)

2.32 All 8 Authorities audited against this area of The Standard actively participated in promotional activities. This included participation in national food safety week, production of information leaflets and newsletters and the placing of information on their websites.

AUDIT ON THE CONTROLS OF FOOD NOT OF ANIMAL ORIGIN

- 3.1 Year three of the audit programme also included an additional focussed audit on the controls of food not of animal origin was carried out at one Scottish Local Authority (Renfrewshire Council incorporating Glasgow Airport). While it appeared that a very small amount of relatively low risk products not of animal origin were imported through the airport, the Authority had in place the basic infrastructure for imported food control. This included, adequate staff training arrangements, Officers dedicated to airport work, established working relationships with key airport personnel and liaison arrangements with other enforcing Authorities commensurate with current import throughput.
- 3.2 This audit was carried out as part of a UK programme and forms part of the Agency's commitment to improving the co-ordination and delivery of this area of work as part of the 'Step Change' programme as outlined below.
- 3.3 Following concern about the UK controls on food imports, and whether these controls are sufficient to ensure the safety of imported food, a Cabinet Office report 'The Organisation of the Government's Controls of Imports of Animals, Fish, Plants and their products' (November 2002) (www.cabinetoffice.gov.uk) recommended a 'Step Change' in the co-ordination and delivery of Local Authority inspection of imported foodstuffs within 1 year (by 31 March 2004).
- 3.4 Work to improve these Local Authority controls is being taken forward by the Food Standards Agency. A new Imported Foods Division has been established with a work plan that addresses the areas of change identified by the Cabinet Office report. The work includes agreed Agency recommendations to improve the effectiveness of imported food controls ('10 Point Plan').

CONCLUSION

- 4.1 The current three-year audit programme in Scotland commenced in June 2001 with all Authorities being audited each year against specific areas of The Standard.
- 4.2 The third year of the audit process has focussed on the areas of The Standard that were not covered during the first and second years. At the end of the three-year programme each Authority has been audited against all areas of the Standard.
- 4.3 The audit programme has played a part in assisting many Authorities to make significant improvements and also in acknowledging the service delivery strengths of each Authority.
- 4.4 All Authorities have either addressed or are addressing the non-conformances that were raised during the first and second years of audits.

AUDIT PROGRAMME 2004 - 2007

- 5.1 The aim of the next round of audits is continuous improvement, ensuring that recently developed or updated policies and procedures are effectively implemented.
- 5.2 The audit programme in Scotland takes account of the UK audit framework. Over the last three years the Scottish programme has looked at all 32 Authorities covering all areas of The Standard (each Authority being audited once per year for three years). However, due to the clearly defined scope of the three audits we now consider that the next phase of the programme should be developed to take a cross sectional view of services aimed at getting a fuller appreciation of the integration of service delivery and management systems.
- 5.3 The programme for 2004-2007 incorporates a plan for audits of a wider scope of enforcement activity to address the identified weakness of the current programme and provide better comparability of audits across the UK. This programme does not involve any changes to the underlying service standards, which are agreed under the Framework Agreement on Local Authority Food Law Enforcement. The programme will therefore build on the strengths of Authorities and on the improvements that have already been made.
- 5.4 The programme includes a plan of focussed audits. Audits of this type have been suggested by various Scottish stakeholders as a means of achieving improvements in service areas where a need has been identified either for improvement or for better intelligence. The development of a programme of focussed audits is also in line with the structure of the audit programmes across the UK.
- 5.5 The new programme of core audits will take account changes in legislation as they occur.

5.5 The audit programme for the period until 31 March 2007 is as follows:

- A programme of audits covering 100% of Authorities over 3 years. These audits are intended to assess a wide range of each Authority's core enforcement activities. The term "core audit" is suggested for this type of audit. The purpose will be to assess the Authority's core activity and the associated management arrangements. Management arrangements in particular can be assessed across all activities rather than only in relation to a subset of activities.
- A programme of focussed audits over the same 3-year period. It is proposed that each focussed audit be initially programmed to cover a sample of Local Authorities. A review of the findings of each programme will determine the necessity to extend the coverage. Development of focussed audit programmes will be staggered to allow the overall audit programme to respond more flexibly to emerging issues. Individual audits will be conducted and audit reports produced in accordance with existing agreed protocols.

ANNEX 1

**SCOTTISH AUDIT ADVISORY COMMITTEE
POST AUDIT QUESTIONNAIRE
FOR SECOND AND THIRD YEAR AUDITS**

1. Were you satisfied with contact arrangements and was sufficient time given to complete and submit your pre-visit questionnaire (PVQ)?

Yes No (If no, please comment further.)

2. Was the information requested by the PVQ:

- Clearly identifiable? Yes No
- Relevant? Yes No
- Reasonable? Yes No
- Understood by the auditors? Yes No

If you have answered no to any of the above please comment further:

3. In the opening meeting was:

- The scope of the audit made clear? Yes No
- The objectives of the audit made clear? Yes No

If you have answered no to any of the above please comment further:

4. Do you feel that the auditors understood your Service?

Yes No (If no, please comment further.)

5. Do you feel that the auditors were knowledgeable about your Service?

Yes No (If no, please comment further.)

6. Were you dissatisfied with any aspect of the audit visit?

Yes (If yes, please comment further.) No

7. Was there an adequate opportunity to discuss the audit findings at the end of the audit?

Yes (If yes, did you find this useful?) No (If no, please comment further.)

8. Were you generally in agreement with the findings?

Yes No (If no, please comment further.)

9. Was it clear from the draft audit report what your authority required to do to rectify the non-conformances raised?

Yes No (If no, please comment further.)

10. Was the draft audit report consistent with the findings discussed at the end of the audit?

Yes No (If no, how did it differ?)

11. Was the final report balanced in terms of what your authority did well in addition to non-conformances?

Yes No (If no, please comment further.)

12. Did you set a realistic timescale to address non-conformances and work within it?

Yes No (If no, please comment further.)

13. Do you feel the audit was of benefit to your Local Authority? (Please tick one.)

Very Beneficial Beneficial Not Very Beneficial

Please comment:

14. Do you feel that the audit process has helped your authority make improvements in:

- The quality of food law/feeding stuffs enforcement? Yes No
- The consistency of food law/feeding stuffs enforcement? Yes No

If you have answered no to any of the above please comment further:

15. Overall, were you happy with the conduct of your auditors?

Yes No (If no, please comment further.)

16. Do you feel that after 3 years the partial audit approach is the best way of achieving the objectives of the legislation?

Yes No (If no, please comment further.)

17. The main aim of the audits is to maintain and improve consumer protection and confidence and ensure that an effective food law enforcement service is provided. What views do you have on whether this is achieved through the audit process?

Please comment:

18. Any final comments?

THANK YOU FOR YOUR TIME AND COOPERATION

Person completing the questionnaire:

Position:

Council:

Date:

PLEASE RETURN THIS QUESTIONNAIRE TO MRS WILMA ODELL, CHAIRPERSON, AUDIT
ADVISORY COMMITTEE SCOTLAND, IN THE ENVELOPE PROVIDED.

Annex 2

SECTIONS OF THE STANDARD - YEAR 3

April –June 2003

Organisation and Management Facilities and Equipment Food and Feeding stuffs Premises Inspections – Feeding stuffs Food, Feeding stuffs and Food Premises Complaints Home Authority Principle Food and Feeding stuffs Inspection and Sampling - Feeding stuffs Enforcement Records and Inspection Reports Complaints about the Service Liaison with Other Organisations Third Party or Peer Review	South Lanarkshire Dundee City Comhairle nan Eilean Siar Argyll and Bute Scottish Borders Highland Fife Angus
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July – October 2003

Organisation and Management Review and Updating of Documented Policies and Procedures Food, Feeding stuffs and Food Premises Complaints Home Authority Principle Advice to Business Control and Investigation of Outbreaks and Food Related infectious Disease Complaints About the Service Liaison with Other Organisations Third Party or Peer Review Food and Feeding stuffs Safety and Standards Promotion	East Renfrewshire Moray Perth and Kinross Falkirk Shetland Stirling City of Edinburgh South Ayrshire
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October 2003–January 2004

Organisation and Management Facilities and Equipment Food and Feeding stuffs Premises Inspections – Feeding stuffs Food, Feeding stuffs and Food Premises Complaints Liaison with Other Organisations Third Party or Peer Review	Orkney Islands Glasgow City West Dunbartonshire Clackmannanshire Dumfries and Galloway Inverclyde Aberdeen City East Lothian
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January – March 2004

Organisation and Management Review and Updating of Documented Policies and Procedures Food and Feeding stuffs Premises Inspections – Feeding stuffs Food Safety Incidents Complaints About the Service Liaison with Other Organisations Internal Monitoring Third Party or Peer Review	East Dunbartonshire North Lanarkshire Aberdeenshire East Ayrshire Renfrewshire West Lothian North Ayrshrie Midlothian
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ANNEX 3

SUMMARY OF NON-CONFORMANCES RAISED

ORGANISATION AND MANAGEMENT (3)

Authorities audited against this section: 32
Authorities that received a non-conformance(s) under section 3.1: 6
Authorities that received a non-conformance(s) under section 3.2: 5

REVIEW AND UPDATING OF DOCUMENTED POLICIES AND PROCEDURES (4)

Authorities audited against this section: 8
Authorities that received a non-conformance(s) under section 4.1: 1
Authorities that received a non-conformance(s) under section 4.2: 2

FACILITIES AND EQUIPMENT (6)

Authorities audited against this section: 16
Authorities that received a non-conformance(s) under section 6.2: 10
Authorities that received a non-conformance(s) under section 6.3: 1

FOOD AND FEEDING STUFFS PREMISES INSPECTIONS (7) - FEEDING STUFFS

Authorities audited against this section: 24
Authorities that received a non-conformance(s) under section 7.2: 1
Authorities that received a non-conformance(s) under section 7.4: 2

FOOD, FEEDING STUFFS AND FOOD PREMISES COMPLAINTS (8)

Authorities audited against this section: 24
Authorities that received a non-conformance(s) under section 8.1: 3
Authorities that received a non-conformance(s) under section 8.2: 3

CONTROL AND INVESTIGATION OF OUTBREAKS OF FOOD RELATED INFECTIOUS DISEASE (13)

Authorities audited against this section: 8
Authorities that received a non-conformance(s) under section 13.1: 4
Authorities that received a non-conformance(s) under section 13.2: 1

FOOD SAFETY INCIDENTS (14)

Authorities audited against this section: 8
Authorities that received a non-conformance(s) under section 14.1: 1
Authorities that received a non-conformance(s) under section 14.3: 1

INTERNAL MONITORING (19)

Authorities audited against this section: 8
Authorities that received a non-conformance(s) under section 19.1: 5