

# Annexes

Annexes for Local Authority Shellfish Traceability Audit Summary Report (England) - July 2025

## Annex A : Summary of Recommendations Raised Against The Standard within the Framework Agreement

The number and percentage of LAs in the programme receiving a recommendation for each relevant area of the Standard in the Framework Agreement.

The Standard	Requirement	Total number of services
3.1, 3.2, 3.3 - Organisation, Service Planning and Management	Draw up, document and implement a service delivery plan	1 (13%)
3.1, 3.2, 3.3 - Organisation, Service Planning and Management	LA Service Plans should include an estimate of the staff resources required to deliver all the demands of the service including those needed to deliver controls related to shellfish traceability and compare it to the resources available, establishing any short fall and the plan to address it	7 (88%)
3.1, 3.2, 3.3 - Organisation, Service Planning and Management	A performance review should be carried out by the Authority at least once a year based on the service delivery plan, documented and submitted for approval to either the relevant member forum or, where approval and management of service delivery plans has been delegated to senior officers, to the relevant senior officer.	3 (38%)
5.1, 5.3, 5.5 - Authorised Officers	Records of relevant academic or other qualifications, training and experience of each authorised officer and appropriate support staff shall be maintained by the Authority in accordance with the relevant Codes of Practice.	1 (13%)
5.1, 5.3, 5.5 - Authorised Officers	Authorities should review their competency and training arrangements to ensure that there is a clear link between competency, training, and officer authorisations.	1 (13%)
4.1 & 4.2 - Review and Updating of Documented Policies and Procedures	Ensure that there are documented policies and procedures for each of its enforcement activities are in place.	1 (13%)
4.1 & 4.2 - Review and Updating of Documented Policies and Procedures	The Authority shall set-up, maintain and implement a control system for all documented policies and procedures including for its shellfish related enforcement activities in accordance with the Food Law Code of Practice, the Food Law Practice Guidance.	5 (63%)
7.2 & 7.4 - Food and Feedingstuffs Establishments Interventions and Inspections	Carry out and document appropriate traceability checks at all relevant parts of the food chain, including shellfish harvesters.	2 (25%)
7.2 & 7.4 - Food and Feedingstuffs Establishments Interventions and Inspections	Record sufficient information of the officer's findings to indicate what was examined/inspected, how compliance with food law is achieved at the food business establishment, and any deficiencies identified.	2 (25%)
19.1 & 19.3 - Internal Monitoring	LAs must ensure internal monitoring procedures covering the full scope of the service delivery, are developed and implemented and that a risk-based approach to internal monitoring is applied.	3 (38%)
19.1 & 19.3 - Internal Monitoring	A record shall be made of all internal monitoring. This should be kept for 2 years.	2 (25%)

## Annex B: Observations for the FSA

The Standard	Observation
1. Training	Some of the Authorities audited felt that the FSA should have a greater role in organising, coordinating, and providing formal training courses relative to official controls relating to shellfish traceability and issuing SRDs.
2. Competency Assessment	Authorities raised concerns regarding the complexity and work involved in applying the FSAs Competency Framework.
3. Guidance	<p>Authorities would value further guidance and worked examples on the roles and responsibilities relating to shellfish traceability controls and issuing SRDs and PTAs. The nature of the shellfish industry can sometimes make it difficult to easily identify key responsibilities, especially when some organisations and individuals can have more than one legal entity in the supply chain.</p> <p>Further guidance on expectations regarding the issuing and monitoring of SRDs would be welcome.</p> <p>Some LAs mentioned that they would like to see an inspection template developed specifically for shellfish harvesting, including traceability checks.</p>
4. Internal monitoring	Further guidance on the delivery of effective risk based internal monitoring of service activities may improve the consistency of monitoring by LAs. This in turn should lead to better oversight of higher risk areas of work and more effective controls being delivered in relation to food hygiene.

## Annex C: Participating LAs

The FSA is grateful for the cooperation and assistance provided by the following Services that were audited as part of the programme:

- North Norfolk District Council
- Boston Borough Council
- Dorset Council
- Teignbridge District Council
- Westmorland and Furness Council
- East Suffolk Council
- Torbay Council
- Bournemouth, Christchurch and Poole Council

## Annex D: Audit Methodology

The audits assessed LA implementation of official controls through:

1. Use of structured audit protocols and checklists for checks of Service files and database records relating to routine official controls relating to food establishments audits/inspections in connection with approved establishment, sampling and any resulting follow-up enforcement activities.
2. Meetings and interviews with officers.
3. Document reviews including all relevant food law enforcement service plans, policies and procedures.
4. A review of selected SRDs and associated documentation.
5. Reality visits of selected approved establishments.

## Annex E: Audit Opinion Definitions

### Audit opinion - assessment of assurance

Assurance	Definition
Substantial	The system for delivering official controls demonstrate effective implementation of planned arrangements suitable to achieve the objectives of legal requirements and guidance.

Assurance	Definition
Moderate	The system for delivering official controls requires some improvement to fully demonstrate effective implementation of planned arrangements suitable to achieve the objectives of legal requirements and guidance.
Limited	The system for delivering official controls requires significant improvement to fully demonstrate effective implementation of planned arrangements suitable to achieve the objectives of legal requirements and guidance.
Unsatisfactory	The system for delivering official controls requires substantial improvement to fully demonstrate effective implementation of planned arrangements suitable to achieve the objectives of legal requirements and guidance.

## Annex F: FSA Auditors

The FSA auditors conducting this audit programme were:

- Alison Dugan, Senior Regulatory Auditor
- Jamie McMeeking, Senior Regulatory Auditor
- Allan Riley, Senior Regulatory Auditor
- Andrew Webb, Senior Regulatory Auditor
- Andrew Gangakhedkar, Head of Regulatory Audit

## Annex G: Glossary

Term	Definition
Authorised Officer	A suitably competent officer who is authorised by the local authority to act on its behalf in, for example, the enforcement of legislation.
Codes of Practice (FLCoP)	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.
Environmental Health Officer (EHO)	Officer employed by the local authority to enforce food safety legislation.
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 hygiene	The legal requirements covering the safety and wholesomeness of food.
Full Time Equivalents (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.
Service Plan	A document produced by a local authority setting out their plans on providing and delivering a food service to the local community.
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.