

## Regulating our Future – Standards and Assurance Workstream

### Report on Pilot Study - Sharing of Industry Audit Data to Inform Local Authority Interventions

#### 1. Executive Summary

1.1 A pilot project was carried out between September and December 2016, with the aim of exploring in principle whether data from industry second party assurance audits could be used to inform local authority (LA) interventions and Food hygiene rating Scheme (FHRS) ratings. The Food Standards Agency worked with Tesco, their Primary Authority (PA) and their audit service provider to deliver the project.

1.2 The pilot required the mapping of second party audit data against the Primary Authority inspection plan<sup>1</sup> for Tesco, which enforcement officers are required to follow during their interventions. Then the second party audit findings relevant to the inspection plan were extracted for 6 stores, and provided with background information to volunteer enforcement officers at selected English LAs.

1.3 Participating enforcement officers were provided with a link to a questionnaire seeking views on the data provided and an FHRS rating exercise, where the officers' estimated FHRS rating based solely on the audit data was compared with the actual FHRS rating allocated on inspection.

1.4 To accommodate the limited duration of the project, some limitations to the pilot were imposed along with areas defined as out of scope. These included data being restricted only to the food safety elements of the second party audits; an assumption that the qualifications and competency of the second party auditors was satisfactory; and that the stores and participating officers were restricted to England only.

1.5 In general the industry data provided was felt to be sufficient by the enforcing officers to enable some assessment of the compliance of the store and decide on an FHRS rating, based solely on the information as provided. Only around 1% of the responses indicated that it was not possible to provide a food hygiene rating under the Food Hygiene Rating Scheme (FHRS) Brand Standard<sup>2</sup>.

1.6 Officers were invited to make comments on the data and provide suggestions for improvement. These included suggestions for additional information on the non-compliances identified by the auditors, and clarification of audit criteria and terminology, which may assist in determining the FHRS rating. These suggestions could be further explored and they have already provided useful insight into how the business data could be improved to better share information with local authorities.

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<sup>1</sup> For further information on inspection plans see Section 1.3 of the Primary Authority Handbook at <https://primaryauthorityregister.info/par/images/documents/handbook.pdf>

<sup>2</sup> The Food Hygiene Rating Scheme: Guidance for local authorities on implementation and operation - the 'Brand Standard'  
<https://www.food.gov.uk/sites/default/files/multimedia/pdfs/enforcement/fhrsguidance.pdf>

1.7 There was also feedback from officers indicating that the inspection data and the PA inspection plan could be usefully reviewed to ensure full alignment with the Food Law Code of Practice<sup>3</sup> and FHRS Brand Standard.

1.8 The pilot has raised some areas for further consideration which were beyond the scope of this pilot:

- Exploration of the potential for the development of required standards for the qualifications, experience and competence of auditors undertaking second and third party audits across the food industry.
- Standardisation and understanding of specific terminology used in business data (e.g. what satisfactory, major and minor non-compliance actually means in practice), and whether there is consistency in the usage of key terms between different businesses and inspection service providers.
- Wider exploration of the potential use of data from other businesses in different sectors e.g. catering or manufacture.

## **2. Introduction**

### **Aims and Key Stakeholders**

2.1 Tesco Stores Ltd is the UK's largest retailer with over 3500 stores, 23 depots, and over 310,000 employees selling 17 million goods per week.

2.2 The FSA, in their Board meeting of 18<sup>th</sup> May 2016, outlined the "Regulating our Future" collaborative strategy to work closely with all businesses to develop a "new approach to regulating food businesses".

2.3 The principles that underpin the future regulatory model are:

1. Businesses are responsible for producing food that is safe and what it says it is, and should be able to demonstrate that they do so. Consumers have a right to information to help them make informed choices about the food they buy – businesses have a responsibility to be transparent and honest in their provision of that information.
2. FSA and regulatory partners' decisions should be tailored, proportionate and based on a clear picture of UK food businesses.
3. Regulators should take into account all available sources of information.
4. Businesses doing the right thing for consumers should be recognised; action should be taken against those that do not.
5. Businesses should meet the costs of regulation, which should be no more than they need to be.

2.4 The FSA invited representatives from 'Big Business' which included Tesco, to a 'Hot House' event to examine the issues surrounding the current regulatory model from the

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3 Food Law Code of Practice April 2015 <https://www.food.gov.uk/enforcement/codes-of-practice/food-law-code-of-practice-2015>

perspective of industry and regulators. The aim was to identify and focus on opportunities to pilot new approaches to regulating food businesses based on the principles above.

2.5 A pilot emerged from the Hot House which aimed to establish if local authorities could assess the compliance of stores and assign a food hygiene rating under the FHRS scheme using only shared data on the outcome from Tesco's Safe and Legal audits. These are carried out on the company's behalf by a second party inspection service provider. This would contribute to work on developing ROF principles, in particular the first principle, relating to businesses demonstrating they produce food that is safe, and the third principle that regulators should take all available information sources into account.

2.6 Outputs from the Hot House were drawn up into a 'canvas', which has been reproduced where relevant throughout this report.

### **What were the main identified pain points?**

2.7 A number of 'pain points' were identified through the hot house process, those listed below were selected to be investigated through this pilot.

- There are many tiers of audit; Local Authorities inspecting Food Businesses and Food Business Owners inspecting their own operations.

Tesco offered to trial a project focused on proactive sharing of their own 'second party' store inspection data. Tesco employs the services of an independent audit service provider to carry out a number of audits in their stores on their behalf. Tesco set the questions and frequency for these audits but the store visit is carried out unannounced and scored independently. The outcomes of these audits serve to verify for Tesco whether the stores are operating the correct procedures across a number of store operations, and to identify any areas for improvement.

- There should be more openness between businesses and regulators.

Tesco are keen to work more openly with regulators and to ensure that their data is in a format which is more suitable to share and be understood. This pilot will support future improvements to Tesco's method of inspections and reporting their data.

- There is a perceived lack of trust between business and regulators.

This pilot is an example of where trust can be improved through working together in a 'safe space' with a joint ambition.

- Local Authorities don't take account of businesses' own data or systems.

This pilot aims to encourage the use of available data by Local Authorities and to demonstrate that businesses can share data in a proactive way to demonstrate compliance.

### **3. Description and Approach**

3.1 Tesco's Primary Authority (PA) has issued an inspection plan for food safety and hygiene which aims to deliver improved and consistent local regulation. The inspection plan focuses on the specific areas with regard to the current Food Law Code of Practice (Chapter 5.6 on Food Establishment Intervention Rating Schemes), the implementation of FHRS and its application to food retail premises.

3.2 Additionally the PA has reviewed Tesco systems in relation to pest control, HACCP and food safety training as well as the second party audits. Therefore enforcing authorities should not review the adequacy of the policies, procedures and training materials during the course of inspections to stores and should focus on the following areas only:

- Food hygiene – structural requirements
- Food hygiene and safety procedures
- Food hygiene – confidence in management

3.3 Building on this principle, Tesco worked with a data analyst from their audit service provider to extract relevant data from the food safety sections of the Tesco store audits carried out by the second party auditors. The data was collated, mapped and reported against the Primary Authority food safety inspection plan framework by the Tesco inspection service provider, under the guidance of the Tesco food safety team (see appendix 2).

3.4 This data from 6 stores was anonymised and provided to the FSA along with some supporting information for use in the pilot. This included:

- An information document from Tesco that provides some background to how the data had been collected (appendix 3).
- The assured advice on store audits issued by the Primary Authority.
- The PA inspection plan document.

3.5 An online survey was developed by the FSA, and this, along with the data and supporting information was tested with officers at one LA before being finalised and issued to the rest of the volunteer LA officers for their review and response.

## Methodology

### 3.6 The pilot involved a number of stages:

| STAGE                       | OBJECTIVE   | METHODOLOGY  |
|-----------------------------|---|--|
| <b>Mapping</b>              | <ul style="list-style-type: none"> <li>To provide the basis for the review of audit information by officers.</li> <li>To confirm that there were no gaps in what the second party auditors and enforcement officers look at on interventions and audits.</li> </ul> | <p>Relevant data extracted from the food safety sections of the Tesco store audits carried out by second party auditors. Data collated, mapped and reported against the PA food safety inspection plan framework.</p>  |
| <b>Store selection</b>      | <p>To provide a range of data encompassing different store formats and FHRs ratings for the LA FHRs rating exercise.</p>  | <p>3 large format (Extra) and 3 small format (Express/convenience) stores were selected to provide a range of food hygiene ratings from a list of 50 stores which had the smallest number of days between the date of the latest LA inspection and that of the Tesco second party audit in their last full round of audits (March to July 2016).</p> <p>In order to reduce the burden on LA resources, six stores were selected to provide a sufficient range of data for enforcement officers to review and complete the questionnaire within a two hour timeframe.</p> |
| <b>Questionnaire design</b> | <p>To provide enforcement officers with the background information required to carry out a review of the inspection information from the six stores to complete an FHRs exercise in a consistent format, and provide comments on the data.</p>                      | <p>Background information drafted by Tesco.</p> <p>Online questionnaire designed by FSA which required participating officers to:</p> <ul style="list-style-type: none"> <li>Provide and justify an FHRs rating, or if unable to do so to state why.</li> <li>Provide a breakdown of the three scores contributing to the rating and justify the score.</li> <li>Suggest if any other information would be helpful in providing more confidence in the audit information.</li> </ul>   |

| STAGE                            | OBJECTIVE  | METHODOLOGY  |
|----------------------------------|--|--|
| <b>Local Authority selection</b> | To provide a pool of around 50 officers to complete the review of the inspection data and complete an online questionnaire.  | Local authorities were selected on the basis of previous interest expressed by an officer in participating in a RoF pilot and also by Food Liaison Group (FLG). It was considered at an early stage that there may be benefit in FLG's discussing the exercise, but this wasn't subsequently pursued as part of the pilot. Emails were sent to lead officers at the LA requesting their team's involvement, who responded with details of volunteers.  |
| <b>Questionnaire Pilot</b>       | To test the questionnaire and review the background information, inspection data and instructions prior to wider distribution.   | Four officers completed the questionnaire and provided valuable feedback which was taken into account in finalising the information pack sent out to LAs. The final questionnaire can be found at appendix 4.  |
| <b>LA survey</b>                 | To obtain feedback on the second party audit data provided on the 6 stores and compare the LA FHRs ratings against those formally provided by an enforcement officer on an intervention. | <p>Background information, audit data and a link to the questionnaire was shared with individual officers who had agreed to participate, requesting a response by a set date. 65 officers from 22 LAs were invited to participate in order to provide the basis for statistically valid analysis.</p> <p>Officers' scoring to be based only on the information provided and assessed in the context of the additional information on the retailers' food safety systems as detailed in their Primary Authority food safety document and inspection plan, which was also provided as part of the trial data. Opportunity provided for officers to input free text comments and suggestions on the survey.</p> |

## Scope

3.7 During the Hot House event the following areas were deemed to be either in or out of scope for the pilot:

| Scope  |  |
|--|--|
| <p><b>In scope</b></p> <ul style="list-style-type: none"> <li>• Proactive sharing of info for earned autonomy</li> <li>• If LA have low risk assessment would we be able to use this / audit less?</li> <li>• Agree an audit process that fits with LA</li> <li>• Link inspection plan to the results of own audit and intervention</li> <li>• Understand the LA assessment of specific premises (stores)</li> <li>• Rely on Tesco audits for assurance</li> <li>• Sharing some audit data</li> <li>• Code of practice risk rating</li> <li>• “second party” audit info on specific stores which haven’t been inspected some time</li> <li>• Primary authority inspection plan data</li> <li>• Sharing relevant data</li> <li>• Food safety only including hygiene and standards</li> <li>• It’s extracting data from different sources</li> <li>• It’s sharing both data ways</li> <li>• With regular and primary authority</li> <li>• England only</li> <li>• Needs to include an understanding of what we did about it</li> <li>• Do we pick one store and try? Number of stores / geography TBC?               <ul style="list-style-type: none"> <li>• In a nutshell:</li> <li>• Not collusion</li> <li>• Building on existing processes</li> <li>• Sharing for benefit of both</li> <li>• Jointly seeing solution</li> <li>• Building trust through data sharing</li> <li>• Robust system of control for benefit of consumers</li> </ul> </li> </ul> | <p><b>Out of scope</b></p> <ul style="list-style-type: none"> <li>• Not other data eg fire safety</li> <li>• Scotland out of scope</li> <li>• Not complaint data</li> <li>• Not including food sampling</li> </ul> |

3.8 Out of Scope Data:

- Health and Safety
- Fire Safety
- Licensing
- Trading Standards data.

3.9 The information relevant to food safety and hygiene needed to be identified and manually extracted from the full audit data and a new report was created showing only the food safety and hygiene information. As some of the relevant details captured by the Tesco second party audit is in free text format, and included Health and Safety information and details of Tesco operating practices, the new report was created manually for the pilot stores and excluded data that was out of scope. In some cases the terminology used by Tesco was amended to be more easily understood by the reviewer.

3.10 Due to the short timescales the store data and local authorities were restricted to England only.

3.11 Tesco has set down minimum requirements for the qualifications and experience of auditors in their stores and this includes monitoring and KPIs on consistency. Officers reviewing the audit data were asked to accept the assumption that the audit service

providers were appropriately qualified and trained to be considered competent for the methods of scoring and delivery of the second party audits required by Tesco.

### Approach to store selection

3.12 The food hygiene rating for 50 stores with the least number of days between inspection and audit was gathered:

| FHRS | Number of stores |
|------|------------------|
| 5    | 46               |
| 4    | 2                |
| 3    | 1 (Conv)         |
| 1    | 1 (Conv)         |

3.13 In order to provide a range of stores and ratings, the lower scoring stores were selected (both Convenience format) and one other Convenience format store with a score of 5 (with the least number of days between inspections and comparable in size of store).

3.14 The Large stores were selected on a similar basis, being comparable in size and departments (e.g. delicatessen counters) and with different ratings (1 rated 5 and 1 rated 4).

| Store  | Tesco Audit date | Date of LA Inspection | FHRS Score | Compliance Hygiene (Score) | Compliance Structural (Score) | Confidence in Management (Score) |
|--------|------------------|-----------------------|------------|----------------------------|-------------------------------|----------------------------------|
| Conv1  | 14/03/2016       | 03/03/2016            | 1          | 15                         | 20                            | 10                               |
| Conv2  | 07/07/2016       | 06/07/2016            | 5          | 0                          | 0                             | 0                                |
| Conv3  | 11/04/2016       | 31/03/2016            | 3          | 10                         | 5                             | 10                               |
| Large1 | 09/03/2016       | 17/03/2016            | 5          | 5                          | 5                             | 0                                |
| Large2 | 04/05/2016       | 16/05/2016            | 5          | 5                          | 5                             | 5                                |
| Large3 | 28/07/2016       | 02/08/2016            | 4          | 5                          | 10                            | 5                                |

3.15 Every question in the Primary Authority inspection plan was mapped to at least one question in the inspections delivered by Tesco's 2nd party audit provider. In some cases it was necessary to map multiple responses from the retailers inspection to the PA inspection plan (for example, where the same question was asked in multiple areas of the store). For the purposes of this exercise, the retailer marked the response in the shared data as 'satisfactory' only where all mapped responses were scored as 'compliant' in their own inspection. The response was marked as 'not satisfactory' where the auditor identified any 'non-compliant' responses. Where this occurred, the reason for the 'non-compliant' response was provided in the shared data.

3.16 Example of Data Extract (see appendix 5 for an example of a complete data set for one store).

| Food Hygiene and Safety Procedures  |  |  |                         |  |                  |
|---|--|--|-------------------------|--|------------------|
| Section   | Question   | Answer   | Question Answer Type    | Next Step  | Time to complete |
| Backdoor and Warehouse  | Has the Backdoor - Delivery Temperature Safe & Legal Record been completed correctly for the current week and previous week?   | Daily/Weekly/Periodic Manager Reviews not been carried out correctly | Non-Satisfactory: Major | Establish why the book had not been completed properly. If necessary retrain colleagues using Managing Safe & Legal Records Workbook | Within 7 days    |
| Backdoor and Warehouse  | Does the Backdoor - Delivery Temperature Safe & Legal Record accurately reflect the standards observed during the audit today? | Yes  | Satisfactory            |  |                  |
| Backdoor and Warehouse  | Is there a working, calibrated probe thermometer?  | No - no test cap or incorrect test cap in Backdoor and Warehouse     | Non-Satisfactory: Minor | Stores to order new test cap on C20, Item Code: 905006418  | Within 7 days    |
| Backdoor and Warehouse  | Is the whole area clean and tidy?  | Yes  | Satisfactory            |  |                  |
| Click & Collect Pod (Grocery home shopping click & collect area)          | Is the whole area clean and tidy?  | Yes  | Satisfactory            |  |                  |
| Counters  | Is the whole area clean and tidy?  | Yes  | Satisfactory            |  |                  |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Are all colleagues wearing the correct uniform which is clean, including hats coats/jackets, aprons where required?            | Yes  | Satisfactory            |  |                  |

#### 4. Outcome measures/KPIs

4.1 The Outcomes and Measures (KPIs) from the Hot House canvas are reproduced here alongside achievement against them:

| Outcomes   | Measures (KPIs)   | Achievement   |
|--|---|---|
| Improved visibility on standards in local area (to LA)                             | Stats around no. of stores, how many audits<br>Timeliness | The trial provided an opportunity to gain insight into how inspection outcomes and reports can be shared and more closely aligned with regulators requirements. <ul style="list-style-type: none"> <li>Data from second party audits aligned with the primary authority inspection plan.</li> <li>Relevant data from second party store audits was successfully shared with participating LAs.</li> </ul> |
| Non-compliance info could drive a better strategy<br>Food safety compliance metric | Do we have a reliable food safety measure?                | <ul style="list-style-type: none"> <li>The majority of officers were able to use the data provided to provide an indicative FHRs rating.</li> </ul>   |
| We look at the same things   | Low effort questionnaire                                  | <ul style="list-style-type: none"> <li>Mapping of second party audit data onto PA inspection plan.</li> <li>Questionnaire sent to 22 participating LAs with responses received from over 50 officers</li> <li>Better correlation noted in ratings relating to large format rather than convenience stores.</li> </ul>   |
| Increased trust  | Some kind of satisfaction score / would this work?        | <ul style="list-style-type: none"> <li>A specific measure of trust was not included within the pilot framework, however officers were asked to suggest what improvements would provide more confidence in the audit information.</li> <li>Officers provided some suggestions for improvement to the data provided from the audits.</li> </ul>   |
| Confidence Tesco would get less inspections  | No. of stores that decided not to inspect                 | <ul style="list-style-type: none"> <li>This was not directly explored as part of the pilot.</li> <li>There is the potential to build on the results from the survey to contribute to further work in this area.</li> </ul>  |
| Reduced risk rating<br>Desktop rescore   | Improved Annex 5 Risk rating                              | <ul style="list-style-type: none"> <li>A reduced rating was not directly explored as part of the pilot, but the LA exercise was structured to enable a comparison of FHRs scores assigned by officers.</li> <li>There was a range of FHRs scores for the 6 stores, with some exhibiting a wider range than others.</li> </ul>   |

## 5. Outputs and Results

### Food Hygiene Ratings

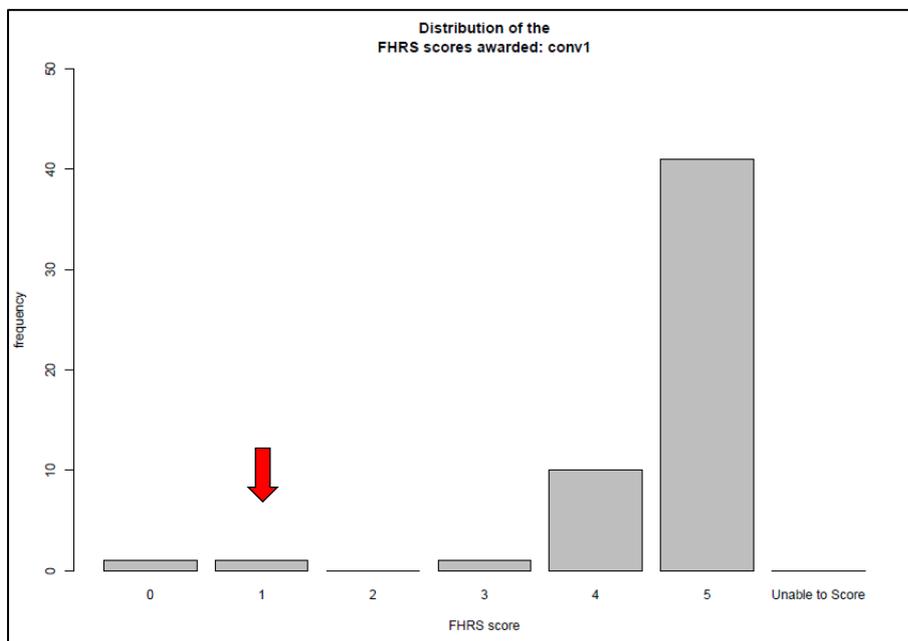
5.1 Only 1% of the responses were unable to provide an FHRs rating from the data provided. For 4 of the 6 stores, at least 75% of the FHRs scores awarded were the same as, or one away from the actual score.

| Store  | Actual Rating | FHRs Score (most respondents) |
|--------|---------------|-------------------------------|
| Conv1  | 1             | 5                             |
| Conv2  | 5             | 5                             |
| Conv3  | 3             | 5                             |
| Large1 | 5             | 4                             |
| Large2 | 5             | 4                             |
| Large3 | 4             | 5                             |

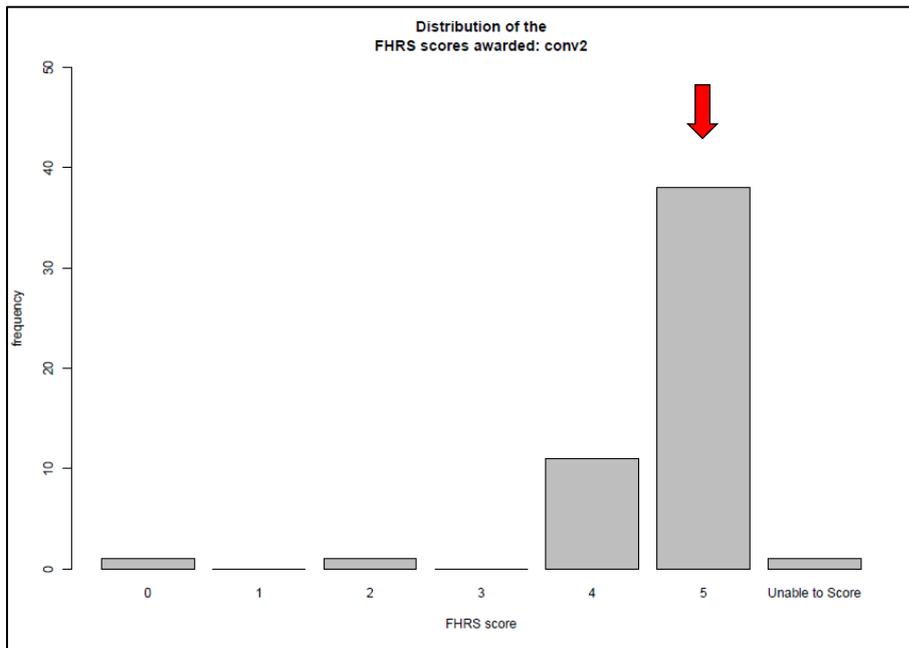
### Distribution of Scores

5.2 Actual FHRs rating indicated by arrow.

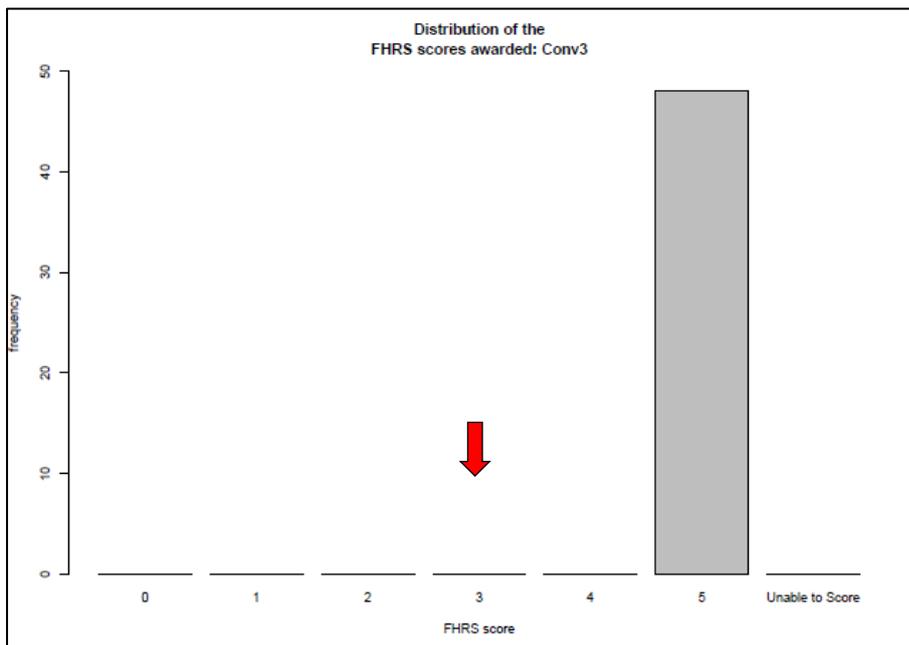
#### Convenience 1



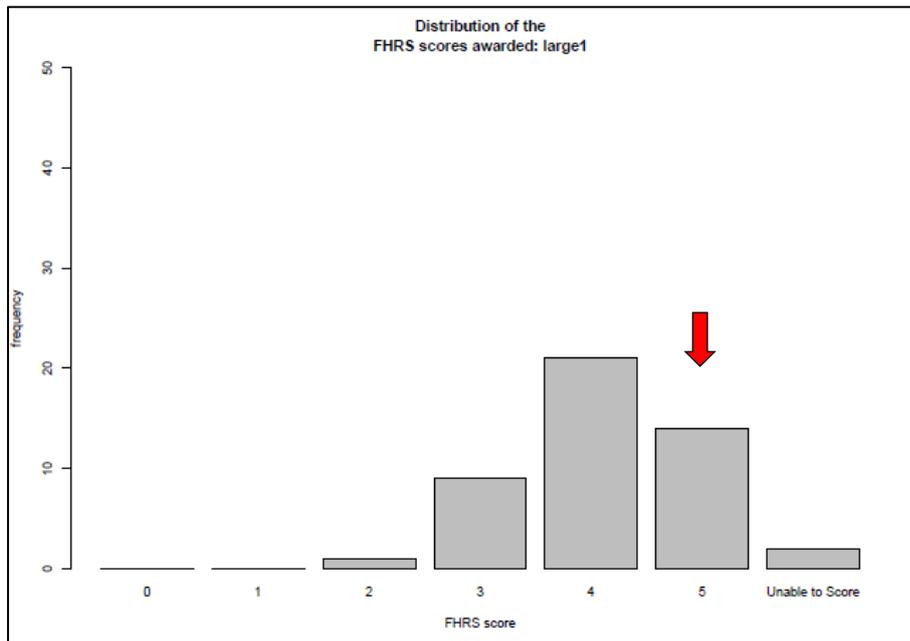
## Convenience 2



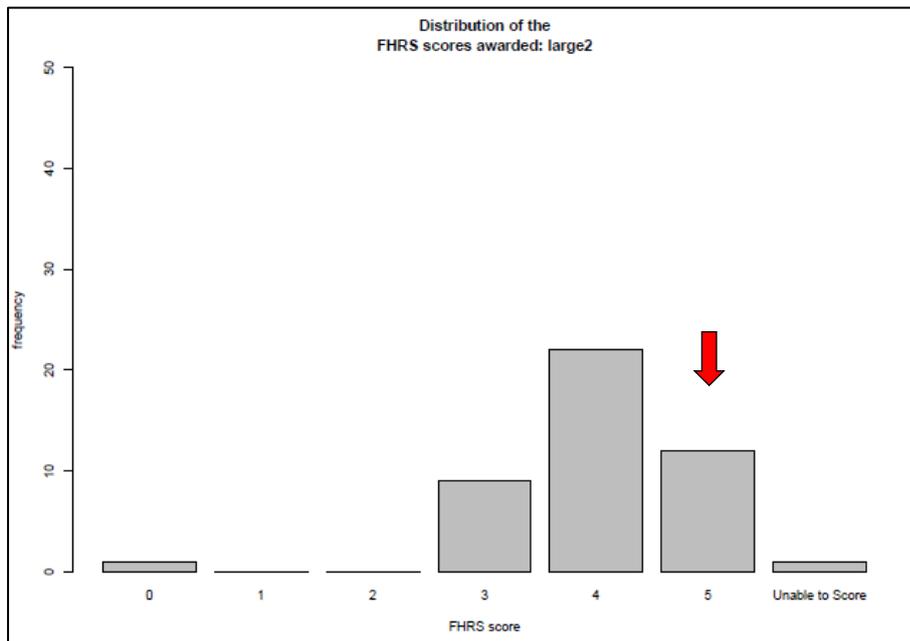
## Convenience 3



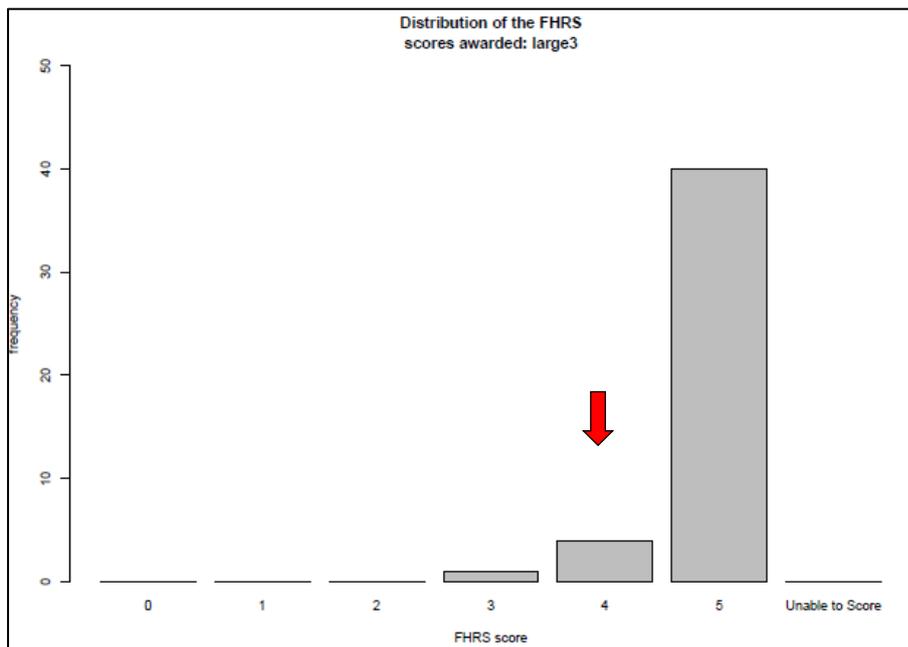
## Large 1



## Large 2



## Large 3



## 6. Discussion and Recommendations

### 6.1 LA Survey findings:

1. The number of responses from officers who felt able to submit a score based on Tesco second party audit data alone was good (99%). This would indicate that there is merit in further exploration of the potential for industry data to be shared with LAs to inform their interventions and FHR ratings.
2. Officers' comments were generally well considered, focused on the findings from the extracted audit data, and took into account the background PA information provided on the systems in place, and the PA inspection plan.
3. Officers were asked to rate the store solely on the audit data provided and the responses from officers showed a significant amount of variation dependent on the store being assessed.
4. It appears that the stores with a greater number of non-compliances tended to show a higher variance in the scores. In general the correlation to the actual food hygiene rating was better for the large stores than convenience stores. Officers rated 2 out of the 3 convenience stores with a higher FHR than the rating awarded to the store on the day of official inspection by the LA. It should be noted that the Tesco inspections in these two lower rated stores were after the date of the local authority inspections and it is possible that some immediate improvement had been made in the interim, for example there was no major non-compliance found in the audit of the store that 11 days previously had been given an FHR of 1.
5. Whilst there were some comments from officers relating to cleaning issues and management records being inappropriately categorised, there appeared to be no significant difference in the officers' ability to provide a score for the three

individual compliance measures that inform the FHRs rating (food hygiene & safety, structural requirements, and confidence in management).

## 6.2 Common themes in the suggested improvements from enforcing officers completing the survey:

1. More detail was wanted in the inspection responses rather than the standard phrases used, and some additional details such as quantifying how many records were incomplete or what certain terms mean, e.g 'red checks' (52 responses). One officer stated that they would like to see:

*"More description of what is meant by untidy and what areas/articles are not clean, as some areas would have no bearing on food safety [whereas] others would be significant."*

**Discussion and recommendations:** It is clear with a desktop assessment such as this that officers will not be able to benefit from first hand observation of non-compliances and the reasons behind them, unlike the second party auditors. Some additional narrative would be helpful if possible to provide more context to the comments.

2. Officers commented that photos of the store during the visit would help to assess the degree of severity of the non-compliance (39 comments)

**Discussion and recommendations** - The objective of this particular data sharing exercise was for officers to rely on the assessment carried out by the second party auditors who were assumed to be sufficiently qualified and competent to make informed judgements on compliance. There is potential that sharing of photographs may result in the participating officers making a separate assessment of the issue leading to potential inconsistency.

However, out of the context of this limited pilot, the sharing of contemporaneous photos taken by a second or third party auditor could be useful in providing additional evidence to demonstrate the severity of non-conformances. This is something that could be explored in future pilots or pathfinder projects.

3. More detail about the definitions of the compliance categories was wanted. e.g. what minor/major/satisfactory means in practice (11 comments). Comments from officers included:

*"... I assume that the auditor was working on Tesco's criteria for the inspection and the terminology is as required by Tesco's. This would mean that a number of issues noted as major non-compliance is something that ... an EHO on an inspection would or could possibly view as minor compliances"*

*"What does 'major' mean in the context of cleaning?"*

*"I would assume that ... all the different supermarket chains and other large food chains would have different criteria and ways of producing reports that could become very difficult for an officer to assess. One solution ...could be that the*

*Primary Authority officers who would have a better understanding of Tesco's procedures and criteria could do the scoring for all the Tesco's across the country".*

**Discussion and recommendations** - Standardisation of the criteria of scoring as well as improved/aligned terminology would be useful to both businesses and enforcing authorities when sharing data. This is something that could be explored further by the RoF programme, taking into account different business and assurance providers' criteria and terminology. The FSA will be exploring the development of PA National Inspection Strategies as part of the RoF programme.

4. Closer alignment of the audit checks (and potentially the PA Inspection Plan) with the Food Law Code of Practice and FHRs Brand Standard (23 comments).

There were comments generally around issues being categorised differently than in the Code of Practice and Brand Standard, in particular comments related to cleaning issues inappropriately categorised as food hygiene & safety non-compliances, and management records in both structural / hygiene & safety requirements rather than in confidence in management.

**Discussion and recommendations** - A review of the PA inspection plan and better alignment of the businesses own inspection structure will result in the data share being more effective in this respect. The pilot has already provided Tesco with the opportunity to scrutinise their database and generate some key learnings and ideas around how data could be more easily extracted in the future, and be presented in a more suitable, accurate and ready to use format. These ideas are now being actively progressed.

5. Knowledge of the store's responses to issues would be helpful (7 comments). Officers were keen to have more information on the reasons for the non-compliance and would welcome the opportunity to find out the response, e.g. by a follow-up telephone interview.

**Discussion and recommendations** - Ensuring that business respond to their own inspection results is an important part of a continuous improvement compliance model. This data can be difficult to gather in a central database but the pilot had led to consideration of future improvement in the way that data on the close out of non-compliances can be captured. This will mean that it can be more easily accessed and shared in the future.

### 6.3 Other areas for consideration

Work on the pilot also raised some issues that were out of scope of this project but may merit discussion/ development as part of the RoF programme:

1. Industry sets the requirements for the qualifications, experience and competence of those undertaking second and third party audits but this is not co-ordinated and may vary across businesses and sectors. There is potential benefit in exploring standardising or accrediting audit bodies. Consistent standards across the food industry are key to ensuring an effective industry assurance regime, for building

trust, and providing confidence to enforcement officers that the outcome of second and third party audits can be relied upon.

2. Different terminology is used by LA enforcement officers and industry inspection providers, and between different providers. For effective engagement and sharing data, the terminology will need to be consistently interpreted and understood by all parties. This may require exploration of the standardisation of specific terminology used in business data e.g. what satisfactory, major and minor non-compliance actually means in practice.
3. Second and third party audits could potentially inform LA intervention programmes and FHRS assessments. The potential resource impact of the incorporation of industry audit data into the FHRS regime could be further considered – both for industry and LAs.
4. This pilot was limited to exploration of the use of data from one major retailer. It would be of value to consider exploration of the potential use of similar data from other retail businesses and those in different sectors e.g. catering or manufacture.
5. The role and engagement of PAs in data sharing has potential for further development, for example in the progression of National Inspection Strategies and the analysis and feedback on inspection plans.

## 7. Acknowledgements

**The Food Standards Agency is grateful for the time, resources and input into this pilot by:**

- Tesco and their Inspection Service Providers.
- Dacorum BC who were the Primary Authority for Food Safety and Hygiene at the time of the pilot.
- The officers from the following local authorities who agreed to participate in the pilot:

Swindon – who piloted the exercise for us.

Carlisle

Cheltenham

Coventry

Gloucester

Hammersmith & Fulham

Kingston-Upon-Thames

Leeds

Manchester

Merton

New Forest

North Dorset

Richmond

Ryedale

South Gloucestershire

South Somerset

Stroud

Sutton

Tewkesbury

Waveney

West Dorset

Weymouth & Portland

## **8. Appendices**

1. Glossary
2. Mapping of the inspection data against the PA Inspection Plan
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## Appendix 1: Glossary

|                                   |   |
|-----------------------------------|---|
| Local Authority                   | The term local authority in this report refers to the local government department responsible for the range of services including Environmental Health (food hygiene law enforcement).  |
| Enforcement officer               | Authorised officers of Competent Authorities who carry out official controls and interventions to verify compliance with food law.  |
| Food Hygiene Rating Scheme (FHRS) | <p>Scheme run by the Food Standards Agency in partnership with local authorities in England, Wales and Northern Ireland.</p> <p>Local authorities are responsible for carrying out inspections of food businesses to check that they meet the requirements of food hygiene law. They give businesses food hygiene ratings based on the findings of inspections and then publish this information on the Food Standards Agency website and can be accessed by consumers.</p> |
| First Party Audits                | Internal audits where companies audit themselves. First party audits are used to confirm the effectiveness of internal systems of control and are carried out by the companies own employees, hired consultants or contractors. These audits are not independent.   |
| Second Party Audits               | External audits usually performed by customers of a company or by others on the customers behalf - they are not totally independent. Audits carried out by bodies having a business association with a company would also be 2nd party audits   |
| Third Party Audits                | External, independent audits performed by organisations such as certification bodies who are usually paid a fee and formally certify the company against a widely recognised private standard (e.g. ISO 9001; BRC Global Standard)  |
| Tesco Convenience Store Format    | Tesco stores are grouped into Formats. In this pilot 'Convenience' stores are Tesco Express stores, without any fresh food offers but may have a small bake off area for preparation of baked morning goods and sweet bakery items.   |
| Tesco Large Store Format          | Tesco stores are grouped into Formats. In this pilot 'Large' stores are Tesco Extra stores, the largest of the formats with multiple fresh food areas including meat counter, cooked meat delicatessen counter, hot chicken counter, customer café and colleague restaurant.  |
| Tesco Audit Round                 | Tesco audits their stores at least twice per year in 2 rounds over each half year.  |

## Appendix 2: Mapping of the Inspection Data against the PA Inspection Plan

|   | Convenience Format - PA Inspection Plan  | Safe & Legal Audit - Equivalent Question   |
|---|--|--|
| <b>Structural requirements</b>            | Are all open food areas covered by correctly located working electric fly killing unit(s)?   | Are all open food areas covered by correctly located working electric fly killer units?  |
|   | Are all doors/exits to external areas free from gaps underneath which are less than 6mm and kept closed when not in use?   | Are all doors/exits to external areas free from gaps underneath which are less than 6mm and kept closed when not in use?   |
|   | Is there a clearly designated area for waste food and is all waste food stored correctly in it?  | Is there a clearly designated area for waste food and is all waste food stored correctly in it?  |
|   | Are all back-up walk-in chillers/freezers working correctly, in a clean and tidy condition with no excessive ice build-up and are the doors kept closed when not in use? | Are all back-up, walk-in chillers/freezers working correctly, in a clean and tidy condition with no excessive ice build up?  |
|   | Are all back-up walk-in chillers/freezers working correctly, in a clean and tidy condition with no excessive ice build-up and are the doors kept closed when not in use? | Are doors and energy doors/curtains to back-up, walk-in chillers/freezers kept closed when not in use?   |
|   | Ask the Duty Manager to log on to 'PestNet Online' and show you any recommendations for the store and how they are being actioned.                                       | Can all Duty Managers log on to 'MyRentokil' and demonstrate all Next Steps are being progressed?  |
| <b>Food Hygiene and Safety Procedures</b> | Are all colleagues wearing the correct uniform which is clean, including hats coats/jackets, aprons and safety shoes where required?                                     | Are all colleagues wearing the correct uniform which is clean, including hats coats/jackets, aprons, and safety shoes where required?                                  |
|   | Are all wash hand basins accessible and clean, have the correct Ecolab soap and a working hand dryer?  | Are all wash hand basins accessible and clean, and have the correct soap, working hand dryer and disposable hand towels to turn off hand operated taps where in place? |
|   | Can all colleagues explain the temperature indicators process and how to deal with a chiller escalation call?  | Are the department/duty manager explain the temperature indicators process and how to deal with a chiller escalation call?   |
|   | Is Aseptopol and all other required cleaning chemicals available for use and used correctly?   | Is Aseptopol and all other required cleaning chemicals available for use, and used correctly?  |
|   | Is the cleaning document and relevant chemical usage cards available?  | Is the cleaning document and relevant chemical usage cards,  |

|                          | Convenience Format - PA Inspection Plan   | Safe & Legal Audit - Equivalent Question   |
|--------------------------|---|--|
|                          |   | available?   |
|                          | Are temperatures being undertaken on cold-chain deliveries?   | Has the Backdoor - Delivery Temperature Safe & Legal Record been completed correctly for the current week and previous week? For petrol filling stations which receive deliveries, is there a working, calibrated probe thermometer available? |
|                          | Are all serving utensils in a clean condition?  | Are all serving or preparation utensils in a clean and undamaged condition?  |
| Confidence in Management | Check records for 2 New Starters (open food handlers) - have they completed Silver Know Your Stuff for Food Safety and Hygiene (Previously Level 2), within 2 weeks and have they had 4 week and 12 week reviews? | Have all legal training courses been completed for all colleagues for each department, and have the training record cards been validated and signed?   |
|                          | Have all staff received Food Safety and Hygiene refresher training in the last 15 months?   | Covered above  |
|                          | Check the training records and ensure at least one manager has completed the Gold/Level 4 Food Safety and Hygiene Training Course?  | Covered above  |
|                          | Are colleagues aware of the 48 hour sickness policy operated at the store?  | Not asked in Safe & Legal Audit  |
|                          | Are the Safe and Legal records being checked and signed by the appropriate manager?   | Checklist: Has the Express Admin & Compliance - Backdoor & Shop Floor Safe & Legal Record been completed correctly for the current week and previous week?   |

| Area                                      | Large Format - PA Inspection Plan  | Safe & Legal Audit - Equivalent Question<br>(audited in multiple areas of store)   |
|---|--|--|
| <b>Structural requirements</b>            | Are all open food areas covered by correctly located working electric fly killing unit(s)?   | Are all open food areas covered by correctly located working electric fly killer units?  |
|   | Are all doors/exits to external areas free from gaps underneath which are less than 6mm and kept closed when not in use?   | Are all doors/exits to external areas free from gaps underneath which are less than 6mm and kept closed when not in use?   |
|   | Is there a clearly designated area for waste food and is all waste food stored correctly in it?  | Is there a clearly designated area for waste food and is all waste food stored correctly in it?  |
|   | In the bakery, is the cleaning equipment shadow board clean, unobstructed and contains the correct tools which are also clean?   | Is the cleaning equipment shadow board clean, unobstructed and contains the correct tools which are also clean?  |
|   | Are all back-up walk-in chillers/freezers working correctly, in a clean and tidy condition with no excessive ice build-up and are the doors kept closed when not in use? | Are all back-up, walk-in chillers/freezers working correctly, in a clean and tidy condition with no excessive ice build up?  |
|   | Are all back-up walk-in chillers/freezers working correctly, in a clean and tidy condition with no excessive ice build-up and are the doors kept closed when not in use? | Are doors and energy doors/curtains to back-up, walk-in chillers/freezers kept closed when not in use?   |
|   | Ask the Duty Manager to log on to 'PestNet Online' and show you any recommendations for the store and how they are being actioned.                                       | Can all Duty Managers log on to 'MyRentokil' and demonstrate all Next Steps are being progressed?  |
| <b>Food Hygiene and Safety Procedures</b> | Are there designated separate storage areas (pegs) for uniforms of colleagues who work in ready-to-eat and raw open food areas?  | Are uniforms of colleagues who work in ready-to-eat and raw open food areas stored separately?   |
|   | Are all colleagues wearing the correct uniform which is clean, including hats coats/jackets, aprons and safety shoes where required?                                     | Are all colleagues wearing the correct uniform which is clean, including hats coats/jackets, aprons, and safety shoes where required?                                  |
|   | Are all wash hand basins accessible and clean, have the correct Ecolab soap and a working hand dryer?  | Are all wash hand basins accessible and clean, and have the correct soap, working hand dryer and disposable hand towels to turn off hand operated taps where in place? |

| Area                            | Large Format - PA Inspection Plan  | Safe & Legal Audit - Equivalent Question<br>(audited in multiple areas of store)  |
|---------------------------------|--|---|
|                                 | Do all colleagues use non-touch techniques when handling ready-to-eat products?  | Do all colleagues use non-touch techniques when handling ready-to-eat products?   |
|                                 | Can all colleagues explain the temperature indicators process and how to deal with a chiller escalation call?  | Can the department/duty manager explain the temperature indicators process and how to deal with a chiller escalation call?  |
|                                 | Are the correct colour-coded serving and preparation utensils in use?  | Are the correct colour-coded serving and preparation utensils in use?   |
|                                 | Are the correct cloths available to clean preparation surfaces and equipment?  | Are the correct cloths available to clean preparation surfaces and equipment?   |
|                                 | Is Aseptopol and all other required cleaning chemicals available for use and used correctly?   | Is Aseptopol and all other required cleaning chemicals available for use, and used correctly?   |
|                                 | Is the cleaning document and relevant chemical usage cards available?  | Is the cleaning document and relevant chemical usage cards, available?  |
|                                 | Is there a clean, working, calibrated probe thermometer and the Ecobac wipes to sanitise it available, and is it used correctly?                                     | Is there a clean, working, calibrated probe thermometer and the correct wipes to sanitise it available, and is it used correctly?   |
|                                 | Has the Hot Deli Temperature Safe and Legal Record been completed, recording details of product temperature checks?  | Has the Hot Food Daily Checks and Temperature Record Safe & Legal Record been completed correctly for the current week and previous week?   |
|                                 |  | Has the Hot food Temperature checks in the Store Management Safe & Legal Handover book been completed correctly for the current week and previous week?   |
|                                 |  | Has the Backdoor - Delivery Temperature Safe & Legal Record been completed correctly for the current week and previous week?  |
| <b>Confidence in Management</b> | Check records for 2 New Starters (open food handlers) - have they completed Silver Know Your Stuff for Food Safety and Hygiene (Previously Level 2), within 2 weeks? | Are all serving or preparation utensils in a clean and undamaged condition?<br><br>Have all new colleagues who joined within the last six months completed the relevant training within the required timeframe, and have the training record cards been validated |

| Area | Large Format - PA Inspection Plan  | Safe & Legal Audit - Equivalent Question<br>(audited in multiple areas of store)                 |
|------|--|--|
|      |  | and signed?  |
|      | Have all staff received Food Safety and Hygiene refresher training in the last 15 months?                                    | Covered above  |
|      | Check the training records of 2 team managers. Have they completed the Gold/Level 4 Food Safety and Hygiene Training Course? | Covered above  |
|      | Are colleagues aware of the 48 hour sickness policy operated at the store?   | Not asked in Safe & Legal Audit (covered in food safety and hygiene training)                    |
|      | Are the Safe and Legal records being checked and signed by the appropriate manager?  | Has the XXX Safe & Legal Record been completed correctly for the current week and previous week? |

## **Appendix 3 – Background information for LAs on the inspection data**

### **Background for Local Authorities**

The Food Standards Agency has a strategic goal of 'Food We Can Trust' and believes that a fundamental redesign of the FSA's regulatory role and of the way in which regulation is delivered for the benefit of consumers, is necessary. For more information about 'Regulating our Future' see <https://www.food.gov.uk/about-us/about-the-fsa/regulating-our-future>

The FSA recognises that many 'big businesses' have robust auditing regimes in place to ensure the food they provide to consumers is safe and what it says it is. Tesco were approached by the Food Standards Agency as part of their 'Regulating our Future' project and through a joint working group (Hothouse Event), Tesco offered to pilot a share of their own store inspection data.

The purpose of this exercise is to assist and inform the FSA in their approach on how this valuable resource of 'big business' data could be used in any future regulatory model.

### **The Data**

The data shared with you in this exercise is extracted from genuine store inspections carried out by the retailers appointed second party inspection body. The retailer has collated the responses from the store 2016 audit and reported them against the relevant questions in their Primary Authority Inspection plan. The Inspection Plan focuses on the following areas and has regard to revisions of the Food Law Code of Practice (Chapter 5.6 on Food Establishment Intervention Rating Schemes), the implementation of the Food Hygiene Rating Scheme (FHRS) and its application to food retail premises:

- Food hygiene – structural requirements
- Food hygiene and safety procedures
- Food hygiene – confidence in management

**You are being asked to review the data with a view to rating the premises under the FHRS scheme. This rating must be based on the data as provided for each 'dummy' store and should be assessed in the context of the additional information on the Retailers' food safety systems as detailed in their Primary Authority Food Safety document and Inspection Plan.**

**Before reviewing the data, you should be familiar with the following documents attached to support you:**

1. Retailer Primary Authority Food Safety document
2. Retailer Primary Authority inspection plan
3. The food Hygiene scoring System in the Food Law Code of Practice (5.6.1)
4. The Food Hygiene Rating Scheme: Guidance for local authorities on implementation and operation - the 'Brand Standard'

## Understanding the Data

Every question in the PA inspection plan is mapped to at least one question in the retailers' audit. In some cases it may be mapped to more than one question or the question may be asked in multiple areas of the store.

For the purposes of this exercise, the retailer has marked the response as 'satisfactory' only where all mapped responses have been marked as 'compliant' in their own audit. The response will be marked as 'not satisfactory' where any 'non-compliant' responses were identified by the auditor. Where this occurs the reason for the 'non-compliant' response has been provided.

## Retailer Store Record Books

There are a number of 'Safe and Legal Record Books' used across all departments and manager roles in the store. The auditor will check all record books in detail and record a 'minor' non-compliance where there is a small number of minor checks not completed or part of the information is missing. The auditor will record a 'major' non-compliance where the missing check is a compliance matter or where there are multiple missing checks in multiple books.

The auditor will always review the standards in store against those recorded in the daily checks (as per example below).

Note that some of the checks reviewed will include H&S as well as food safety checks and some checks are against Tesco policy rather than regulatory compliance. The responses will be presented as follows:

| Confidence in Management  |  |  |                         |  |                  |
|---|--|--|-------------------------|--|------------------|
| Section   | Question   | Answer   | Question Answer Type    | Next Step  | Time to complete |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Has the Food Counters Safe & Legal Record been completed correctly for the current week and previous week? | Daily/Weekly/Periodic Manager Reviews not been carried out correctly | Non-Satisfactory: Minor | Establish why the book had not been completed properly. If necessary retrain colleagues using Managing Safe & Legal Records Workbook | Within 7 days    |
| Counters (including Fish, Meat, Deli, Hot Deli)                           | Does the Food Counters Safe & Legal  | Yes  | Satisfactory            |  |                  |

|                            |  |  |  |  |  |
|----------------------------|--|--|--|--|--|
| and Food-To-Go where seen) | Record accurately reflect the standards observed during the audit today? |  |  |  |  |
|----------------------------|--|--|--|--|--|

**Note: Small stores – Convenience/ Express only use 1 record book, so some questions and responses on record books will be marked as Not Applicable (NA).**

## Appendix 4: Local Authority Questionnaire

Questionnaire to be completed based on the data supplied under separate cover.

Please refer to 'Trial Information for Local Authorities' document before completing questionnaire.

**\*1. Store name:**

**\*2. Based on the data supplied, how would you rate the store's compliance with Food Hygiene and Safety Procedures?**

**\*3. Based on the data supplied, how would you rate the store's compliance with Structural Requirements?**

**\*4. Based on the data supplied, how would you rate your confidence in the Management/Control Procedures?**

**\*5. Based on the data supplied, what FHSR score would you award?**

**\*6. Please provide comments to justify the score awarded:**

**7. What, if any, additional information would give you more confidence in the information provided in the report?**

**Appendix 5: Second Party Inspection Dataset from 1 of the 6 anonymised stores (large format store)**

| <b>Confidence in Management</b>   |   |   |                         |  |                  |
|---|---|---|-------------------------|--|------------------|
| Section   | Question  | Answer  | Question Answer Type    | Next Step  | Time to complete |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Has the Food Counters Safe & Legal Record been completed correctly for the current week and previous week?                        | Daily/Weekly/Periodic Manager Reviews not been carried out correctly  | Non-Satisfactory: Minor | Establish why the book had not been completed properly. If necessary retrain colleagues using Managing Safe & Legal Records Workbook | Within 7 days    |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Does the Food Counters Safe & Legal Record accurately reflect the standards observed during the audit today?                      | Yes   | Satisfactory            |  |                  |
| Management Systems - Non-Express  | Has the Compliance Manager's Quarterly Safe & Legal Record been completed correctly for the current quarter and previous quarter? | Daily/Weekly/Periodic Manager Reviews not been carried out correctly  | Non-Satisfactory: Minor | Establish why the book had not been completed properly. If necessary retrain colleagues using Managing Safe & Legal Records Workbook | Within 7 days    |
| Management Systems - Non-Express  | Has the Duty Manager's Safe & Legal Record been completed correctly for the current week and previous week?                       | Daily/Weekly/Periodic Manager Reviews not been carried out correctly and Not all checks completed or signed | Non-Satisfactory: Major | Establish why the book had not been completed properly. If necessary retrain colleagues using Managing Safe & Legal Records Workbook | Within 7 days    |

|                                  |  |   |                         |  |               |
|----------------------------------|--|---|-------------------------|--|---------------|
| Management Systems - Non-Express | Does the Duty Manager Safe & Legal Record accurately reflect the standards observed during the audit today?  | Yes   | Satisfactory            |  |               |
| Management Systems - Non-Express | Has the Store Manager's Quarterly Safe & Legal Record been completed correctly for the current quarter and previous quarter?   | Daily/Weekly/Periodic Manager Reviews not been carried out correctly and Not all checks completed or signed | Non-Satisfactory: Major | Establish why the book had not been completed properly. If necessary retrain colleagues using Managing Safe & Legal Records Workbook | Within 7 days |
| Management Systems - Non-Express | Have all legal training courses been completed for all colleagues for each department, and have the training record cards been validated and signed?                                       | Yes   | Satisfactory            |  |               |
| Management Systems - Non-Express | Have all new colleagues who joined within the last six months completed the relevant training within the required timeframe, and have the training record cards been validated and signed? | NA - no recently new colleagues in store  | NA                      |  |               |
| Scratch Bakery                   | Has the Bakery Safe & Legal Record been completed correctly for the current week and previous week?  | Daily/Weekly/Periodic Manager Reviews not been carried out correctly  | Non-Satisfactory: Minor | Establish why the book had not been completed properly. If necessary retrain colleagues using Managing Safe & Legal Records          | Within 7 days |

|                          |   |     |              |          |  |
|--------------------------|---|-----|--------------|----------|--|
|                          |   |     |              | Workbook |  |
| Scratch Bakery           | Does the Bakery Safe & Legal Record accurately reflect the standards observed during the audit today?                                 | Yes | Satisfactory |          |  |
| Tesco-Run Colleague Room | Has the Catering Safe & Legal Record been completed correctly for the current week and previous week?                                 | Yes | Satisfactory |          |  |
| Tesco-Run Colleague Room | Does the Catering Safe & Legal Record accurately reflect the standards observed during the audit today?                               | Yes | Satisfactory |          |  |
| Tesco-Run Colleague Room | Has the Catering Temperature Staff/Customer Oven Safe & Legal Record been completed correctly for the current week and previous week? | Yes | Satisfactory |          |  |
| Tesco-Run Colleague Room | Does the Catering Temperature Staff/Customer Oven Safe & Legal Record accurately reflect the  | Yes | Satisfactory |          |  |

|                          |  |     |              |  |  |
|--------------------------|--|-----|--------------|--|--|
|                          | standards observed during the audit today?   |     |              |  |  |
| Tesco-Run Colleague Room | Has the Catering Temperature Staff/Customer Servery Safe & Legal Record been completed correctly for the current week and previous week?   | Yes | Satisfactory |  |  |
| Tesco-Run Colleague Room | Does the Catering Temperature Staff/Customer Servery Safe & Legal Record accurately reflect the standards observed during the audit today? | Yes | Satisfactory |  |  |

| <b>Food Hygiene and Safety Procedures</b> |  |  |                         |   |                  |
|---|--|--|-------------------------|---|------------------|
| Section                                   | Question   | Answer   | Question Answer Type    | Next Step   | Time to complete |
| Backdoor and Warehouse                    | Has the Backdoor - Delivery Temperature Safe & Legal Record been completed correctly for the current week and previous week? | Daily/Weekly/Periodic Manager Reviews not been carried out correctly | Non-Satisfactory: Major | Establish why the book had not been completed properly. If necessary retrain colleagues using Managing Safe & Legal Records | Within 7 days    |

|   |  |  |                         |  |               |
|---|--|--|-------------------------|--|---------------|
|   |  |  |                         | Workbook   |               |
| Backdoor and Warehouse  | Does the Backdoor - Delivery Temperature Safe & Legal Record accurately reflect the standards observed during the audit today? | Yes  | Satisfactory            |  |               |
| Backdoor and Warehouse  | Is there a working, calibrated probe thermometer?  | No - no test cap or incorrect test cap in Backdoor and Warehouse | Non-Satisfactory: Minor | Stores to order new test cap on C20, Item Code: 905006418  | Within 7 days |
| Backdoor and Warehouse  | Is the whole area clean and tidy?  | Yes  | Satisfactory            |  |               |
| Click & Collect Pod (Grocery home shopping click & collect area)          | Is the whole area clean and tidy?  | Yes  | Satisfactory            |  |               |
| Counters  | Is the whole area clean and tidy?  | Yes  | Satisfactory            |  |               |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Are all colleagues wearing the correct uniform which is clean, including hats coats/jackets, aprons where required?            | Yes  | Satisfactory            |  |               |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Are all serving or preparation utensils in a clean condition?  | No - minor non-compliance in Fish Counter                        | Non-Satisfactory: Minor | Thoroughly clean all preparation utensils using the appropriate chemicals. All damaged utensils should be disposed of and replaced | Immediate     |

|   |   |  |                         |  |               |
|---|---|--|-------------------------|--|---------------|
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Are all wash hand basins accessible and clean, have the correct soap, and working hand dryer?   | Yes  | Satisfactory            |  |               |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Are the correct cloths available to clean preparation surfaces and equipment?   | Yes  | Satisfactory            |  |               |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Are the correct colour-coded serving and preparation utensils in use?   | Yes  | Satisfactory            |  |               |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Are uniforms of colleagues who work in ready-to-eat and raw open food areas stored separately?  | Yes  | Satisfactory            |  |               |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Can the department manager explain the temperature indicators process and how to deal with a chiller escalation call?                     | NA - no managers on Counters at time of audit                        | NA                      |  |               |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Do all colleagues use non-touch techniques when handling ready-to-eat products?   | Yes  | Satisfactory            |  |               |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Has the Hot Food Daily Checks and Temperature Record Safe & Legal Record been completed correctly for the current week and previous week? | Daily/Weekly/Periodic Manager Reviews not been carried out correctly | Non-Satisfactory: Major | Establish why the book had not been completed properly. If necessary retrain colleagues using Managing Safe & Legal Records Workbook | Within 7 days |

|   |   |  |                         |  |               |
|---|---|--|-------------------------|--|---------------|
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Does the Hot Food Daily Checks and Temperature Record Safe & Legal Record accurately reflect the standards observed during the audit today? | Yes  | Satisfactory            |  |               |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Is Aseptopol and all other required cleaning chemicals available for use, and used correctly?   | Yes  | Satisfactory            |  |               |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Is the cleaning document (including coloured cleaning diagram) and relevant chemical usage cards, available?                                | Yes  | Satisfactory            |  |               |
| Dot Com (Grocery home shopping marshalling/delivery area)                 | Is the whole area clean and tidy?   | Yes  | Satisfactory            |  |               |
| Scratch Bakery  | Are all colleagues wearing the correct uniform which is clean, including hats coats/jackets, aprons where required?                         | Yes  | Satisfactory            |  |               |
| Scratch Bakery  | Are all serving or preparation utensils in a clean and undamaged condition?   | Yes  | Satisfactory            |  |               |
| Scratch Bakery  | Are all wash hand basins accessible and clean, have the correct soap, and working hand dryer?   | Yes  | Satisfactory            |  |               |
| Scratch Bakery  | Are the correct cloths available to clean preparation surfaces and equipment?   | Yes  | Satisfactory            |  |               |
| Scratch Bakery  | Is Aseptopol and all other required cleaning chemicals available for use, and used correctly?   | Colleague not aware of contact times in Bakery | Non-Satisfactory: Minor | Colleagues should be retrained using the Ecolab training card for cleaning chemicals | Within 7 days |

|                               |  |     |              |  |  |
|-------------------------------|--|-----|--------------|--|--|
| Scratch Bakery                | Is the cleaning document (including coloured cleaning diagram) and relevant chemical usage cards, available?   | Yes | Satisfactory |  |  |
| Scratch Bakery                | Is the whole area clean and tidy?  | Yes | Satisfactory |  |  |
| Store Entrance and Shop Floor | Can the department manager explain the temperature indicators process and how to deal with a chiller escalation call?  | Yes | Satisfactory |  |  |
| Store Entrance and Shop Floor | Is Aseptopol and all other required cleaning chemicals available for use, and used correctly?  | Yes | Satisfactory |  |  |
| Store Entrance and Shop Floor | Is the cleaning document, and relevant chemical usage cards, available?  | Yes | Satisfactory |  |  |
| Store Entrance and Shop Floor | Is the whole area clean and tidy?  | Yes | Satisfactory |  |  |
| Tesco-Run Colleague Room      | Are all colleagues wearing the correct uniform which is clean, including hats coats/jackets, aprons, and safety shoes as appropriate?                                  | Yes | Satisfactory |  |  |
| Tesco-Run Colleague Room      | Are all serving or preparation utensils in a clean condition?  | Yes | Satisfactory |  |  |
| Tesco-Run Colleague Room      | Are all wash hand basins accessible and clean, and have the correct soap, working hand dryer and disposable hand towels to turn off hand operated taps where in place? | Yes | Satisfactory |  |  |

|                          |   |                                      |                         |   |               |
|--------------------------|---|--------------------------------------|-------------------------|---|---------------|
| Tesco-Run Colleague Room | Are the correct cloths available to clean preparation surfaces and equipment?                 | No - non-compliant in Colleague Room | Non-Satisfactory: Minor | Ensure the Tesco approved cleaning cloths are used, in accordance with policy for raw and cooked areas and the Ecolab Cleaning card for this area is being followed | Immediate     |
| Tesco-Run Colleague Room | Are the correct colour-coded serving and preparation utensils in use?                         | Yes                                  | Satisfactory            |   |               |
| Tesco-Run Colleague Room | Is Aseptopol and all other required cleaning chemicals available for use, and used correctly? | Colleague not aware of contact times | Non-Satisfactory: Minor | Colleagues should be retrained using the Ecolab training card for cleaning chemicals  | Within 7 days |
| Tesco-Run Colleague Room | Is the cleaning document, and relevant chemical usage cards, available?                       | Yes                                  | Satisfactory            |   |               |
| Tesco-Run Colleague Room | Is the whole area clean and tidy?   | Yes                                  | Satisfactory            |   |               |

| <b>Structural requirements</b> |   |        |                      |           |                  |
|--------------------------------|---|--------|----------------------|-----------|------------------|
| Section                        | Question  | Answer | Question Answer Type | Next Step | Time to complete |
| Backdoor and Warehouse         | Are all back-up, walk-in chillers/freezers working correctly, in a clean and tidy condition with no excessive ice build up? | Yes    | Satisfactory         |           |                  |

|   |   |                                    |                         |  |           |
|---|---|------------------------------------|-------------------------|--|-----------|
| Backdoor and Warehouse  | Are all doors/exits to external areas free from gaps underneath which are less than 6mm and kept closed when not in use?    | Yes                                | Satisfactory            |  |           |
| Backdoor and Warehouse  | Are doors and energy doors/curtains to back-up, walk-in chillers/freezers kept closed when not in use?                      | Yes                                | Satisfactory            |  |           |
| Backdoor and Warehouse  | Is there a clearly designated area for waste food and is all waste food stored correctly in it?                             | Yes                                | Satisfactory            |  |           |
| Click & Collect Pod (Grocery home shopping click & collect area)          | Are all back-up, walk-in chillers/freezers working correctly, in a clean and tidy condition with no excessive ice build up? | Chiller/freezer not clean and tidy | Non-Satisfactory: Major | Thoroughly clean and tidy the chiller/freezer to minimise any risk of contamination of food  | Immediate |
| Click & Collect Pod (Grocery home shopping click & collect area)          | Are doors and energy doors/curtains to back-up, walk-in chillers/freezers kept closed when not in use?                      | Yes                                | Satisfactory            |  |           |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Are all open food areas covered by correctly located working electric fly killer units?                                     | Yes                                | Satisfactory            |  |           |
| Counters (including Fish, Meat, Deli, Hot Deli and Food-To-Go where seen) | Is there a clearly designated area for waste food and is all waste food stored correctly in it?                             | Yes                                | Satisfactory            |  |           |
| Dot Com (Grocery home shopping marshalling/delivery area)                 | Are all back-up, walk-in chillers/freezers working correctly, in a clean and tidy condition with no excessive ice build up? | Chiller/freezer not clean and tidy | Non-Satisfactory: Major | Thoroughly clean and tidy the chiller/freezer to minimise any risk of contamination of food. | Immediate |

|   |  |  |                         |   |               |
|---|--|--|-------------------------|---|---------------|
| Dot Com (Grocery home shopping marshalling/delivery area) | Are all doors/exits to external areas free from gaps underneath which are less than 6mm and kept closed when not in use? | Yes                                      | Satisfactory            |   |               |
| Dot Com (Grocery home shopping marshalling/delivery area) | Are doors and energy doors/curtains to back-up, walk-in chillers/freezers kept closed when not in use?                   | Yes                                      | Satisfactory            |   |               |
| Dot Com (Grocery home shopping marshalling/delivery area) | Is there a clearly designated area for waste food and is all waste food stored correctly in it?                          | Yes                                      | Satisfactory            |   |               |
| Management Systems - Non-Express                          | Can all Duty Managers log on to 'Pestnetonline/MyRentokil' and demonstrate all Next Steps are being progressed?          | No - Next Steps are not being progressed | Non-Satisfactory: Minor | Duty manager must ensure all next steps are progressed and this is documented on 'Pestnetonline/My Rentokil'. | Within 7 days |
| Scratch Bakery  | Are all open food areas covered by correctly located working electric fly killer units?                                  | Yes                                      | Satisfactory            |   |               |
| Scratch Bakery  | Is the cleaning equipment shadow board clean, unobstructed and contains the correct tools which are also clean?          | No - tools not clean                     | Non-Satisfactory: Minor | Clean Tools on the Shadow Board   | Immediate     |
| Tesco-Run Colleague Room                                  | Are all open food areas covered by correctly located working electric fly killer units?                                  | Yes                                      | Satisfactory            |   |               |