

Food Hygiene Inspection Procedure

*Model Procedure developed by the
London Food Co-ordinating Group
(Revised January 2007)*



London Food Co-ordinating Group

Model Food Hygiene Inspection Procedure

1. Purpose of procedure

- 1.1 The purpose of this procedure is to provide a framework for enforcement officers to follow in order to achieve a consistent approach to the inspection of food premises including the principles of Hazard Analysis Critical Control Points (HACCP).
- 1.2 The purpose and objectives of a food hygiene inspection are defined in Paragraph 4.2.2: 'Inspections – General', of the Food Safety Act 1990 Code of Practice.

2. Scope

- 2.1 This procedure relates to all food premises within the London Borough of (*Insert Name of LA*), where food is prepared or handled for consumption by the public.
- 2.2 'Primary' and 'Secondary' inspections are defined in paragraphs 4.1.2 and 4.1.3 of the Code.
- 2.3 The inspection programme is based on the Food Hygiene Inspection Rating Scheme referred to in paragraph 4.1.5: 'Inspection Ratings' and described in Annexe 5 of the Code.
- 2.4 Inspections of food premises may also take place outside of the Inspection Programme, such as following a complaint.

3. Responsibility

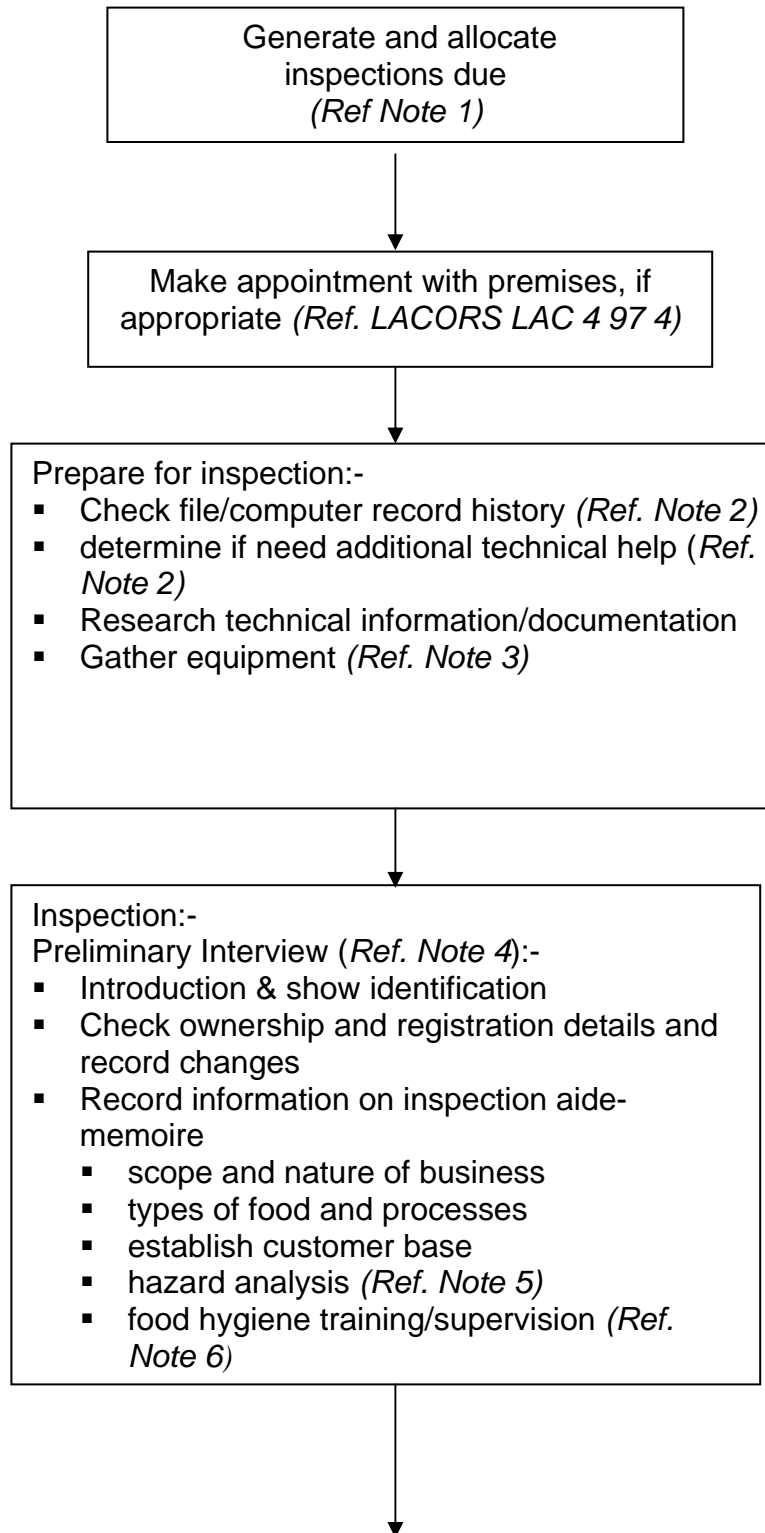
- 3.1 The Lead Officer for Food Hygiene (*or insert title of the responsible person*) is responsible for the operation of the procedure and ensuring that it is followed. All authorised officers¹ are responsible for undertaking inspections in accordance with this procedure.

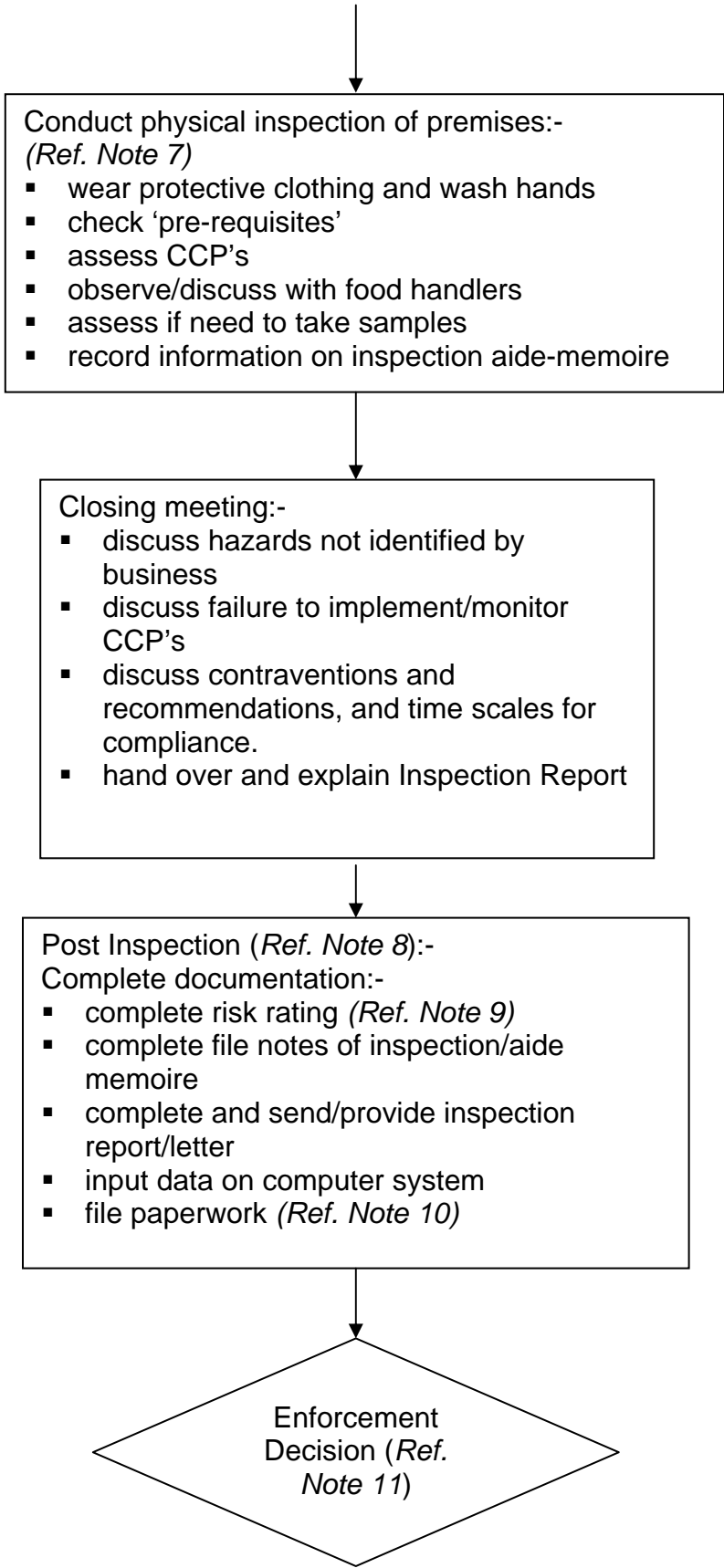
¹ Officers are only to undertake inspections of categories of food premises in accordance with their level of authorisation as described under 1.2.2: General Qualification and Experience Requirements of the Code.

4. References

- Food Safety Act 1990 Code of Practice (Issued March 2006)
- LACORS Circular LAC 4 97 4 (status: part current)
- LACORS Hazard Analysis guidance document (July 1997) (status: part current)
- LACORS Food Hygiene Risk Assessment - Guidance to Local Authorities on the application of risk assessment principles to food hygiene inspections (July 1995) (status: part current)
- Advice for Home Authorities on the Assessment of Food Safety Management Systems in Multi-Outlet Businesses 18/07/2006
- Company-wide Hygiene Arrangements in Multi-site Food Businesses. – Advice on Communication between Authorities with Reference to the Home Authority Principle. 25/07/2006
- LACORS Home Authority Principle – Standards (27/08/2002)
- Guidelines for Home Authorities - Detailed guidance for authorities acting as a Home Authority (01/03/1997)
- LACORS Guidance on the Training/Instruction/Supervision of Food Handlers (December 2001) (Status: being updated)
- London Food Co-ordinating Group and Association of London Environmental Health Managers – Food Hygiene Inspection Rating Guidance (December 2006)

5. Inspection Procedure – Process Flowchart





5.1 Inspection Procedure - Notes:

Note 1 - Allocation of Inspections

(LA to insert their own arrangements of the allocation of inspections to officers)

The Food Standards Agency may require the authority to take urgent action to reschedule the inspection programme in response to situations that occur from time to time. In such cases inspections will be allocated accordingly. Refer to paragraph 4.1.7: 'Need to Re-schedule Primary Inspections' of the Code.

Note 2 - Preparation for the inspection & checking file/computer record history

This should include examining the following:

- Last inspection report/correspondence
- Previous inspection outcome
- Revisit correspondence/outcome
- Previous risk rating
- Food premises Registration form
- Complaints received since the last inspection and their outcomes
- Any formal action taken (e.g. notices service, prosecutions etc.)
- Results of any samples taken
- Technical documents, Codes of Practice, Industry Guides to Good Hygiene Practice and other Industry guides

Officers should determine whether they need any additional technical help and make this available. This may, for example, involve the Public Analyst, HPA laboratory service or food technology specialists. Officers may also wish to consider combining the food inspection with another type, such as health and safety or trading standards so as to minimise the disruption to the business.

Officers must, where expected use an inspection form which covers all the elements of an inspection as described within the Code (refer to 4.1.2: 'Primary Inspections – General' and Annexe 6). It will also be appropriate for officers to use any LACORS aide-memoires produced for the inspection of premises requiring approval under Regulation (EC) No. 853/2004.

Note 3 - Equipment

Officers should ensure that they are equipped with all the necessary equipment for the inspection. This would include: -

- Authorisation
- Clean white/lightly coloured coat, headgear and hairnet (or integral headgear with hairnet)
- A calibrated thermometer with air, between-pack and probe attachments and disinfectant wipes, and/or an infra red thermometer²
- PACE Notebook and pen
- Torch
- Inspection report forms
- Inspection aide-memoire
- Business cards
- Information pack/leaflets

Officers may need to take supplementary equipment such as sampling containers, bags, tags, camera etc.

Officers may need to wear the protective clothing provided by the premises being inspected, and must adhere to reasonable food safety precautions that are required by the business. This may include the provision of reasonable information about health status.

Appropriate footwear should be worn (e.g. food grade wellington boots may be required in manufacturing premises).

Note 4 – The preliminary interview

When Officers arrive at the premises they should introduce themselves to the Food Business Operator, manager or whoever is in charge at the premises, and show the person their authority/identification. Officers need to explain the purpose of the inspection and the approach that will be taken. The Officers should then check that the information held on record about the business is up to date (e.g. food premises registration form details)

Officers must then use any inspection aide memoire to ensure that essential information is gathered during the inspection. Notes of information obtained and observations made must be taken in officers PACE notebooks or on the aide memoire.

Officers will need to establish what processes are used (e.g. cook-chill, vacuum packing, pasteurisation etc.) It is important to establish matters such as whether food is prepared for another premises, home deliveries, takeaways etc. For

² Infra red thermometers are not appropriate for enforcement action or under Regulation (EC) No. 853/2004. under Regulation (EC) No. 852/2004

catering premises, the menu should be examined to establish what type of foods are prepared/sold.

Officers also need to establish whether any of the product-specific legislation applies to the activities undertaken at the premises (e.g. by examining invoices to determine the foods sold and whether they are sold to the 'ultimate consumer').
(LA to insert reference to any separate procedure on Approved premises)

The customer base of the business must be identified. This involves obtaining information about the scale and extent of the business (e.g. where products are distributed to), the number and types of customers (particularly establishing if/how many are in vulnerable groups)

Food business operators are required to put in place, implement and maintain a permanent procedure or procedures based on HACCP principles. Any food safety management system in use must be identified. Documents and records must be established (where deemed commensurate with the nature and size of the food business) to demonstrate effective application of the HACCP principles.

Note 5 - Hazard Analysis

If the food safety management system is documented, it may include some of the following:

- Safer Food Better Business or other like system for the safe production of food
- Food safety policy
- Staff food hygiene training policy and records
- Procedures relating to the use of 'approved' suppliers, and procedures of the acceptance of food deliveries
- Temperature control monitoring procedures, and records of temperature monitoring; including arrangements and records for calibration of thermometers
- Cleaning and disinfection policy/schedule and procedures, and records
- Procedure for the maintenance of equipment
- Stock control procedure
- Procedures in relation to staff illness (fitness to work policy/procedure)
- Pest control contract and records of visits
- Refuse collection arrangements
- Procedure for dealing with customer complaints
- Product recall system including product traceability, where appropriate
- Food sampling arrangements and results of sampling, where appropriate

In examining the food safety management system and the hazard analysis element the officer must make an assessment whether the food safety hazards

posed by the business, and the necessary controls and monitoring have been identified. The inspection then should focus on establishing whether the hazard analysis is effectively implemented. The Food Business Operator's/manager's and staff's understanding of the hazards, controls and monitoring should also be determined. The other parts of the food safety management system should be examined to check whether they have been effectively implemented (e.g. that procedures are being followed and records reflect that matters are under control).

Officers must check for the existence of appropriate documentation and examine this to establish whether food safety hazards are under control. Officers should select at least one of the high-risk food items from the menu, and ask the manager/Food Business Operator to discuss, and demonstrate if possible, how and where the food is prepared. This will then be used as the basis for establishing the Manager/Food Business Operator's understanding of the food safety hazards associated with the food and preparation, and whether controls and monitoring have been identified and implemented by the Food Business Operator. Examples of questions that can be used to obtain this information are contained in Annex 4 of the LACORS Hazard Analysis Guidance (July 1997). The officer will then form a judgement as to whether the food safety hazards posed by the business, and the necessary controls and monitoring have been identified and implemented.

If the Food Business Operator has insufficient or no knowledge of hazard analysis, or has knowledge but there are shortcomings, guidance materials such as Safer Food Better Business should be used to discuss hazard analysis or the shortcomings.

Note 6 - Food Hygiene instruction and supervision and/or training

The officer must make an assessment of the effectiveness of supervision and/or training of staff. The names and roles of the food handling staff should be obtained, and if the training certificates are available they should be checked. During the physical inspection, staff should be questioned to assess their understanding of good food hygiene practices. Officers will wish to have regard to LACORS guidance on this matter (December 2001).

Note 7 - Physical Inspection

Following the preliminary interview, a physical inspection of the premises and activities must be undertaken. The purpose of this is detailed in paragraph 4.2.4: 'Food Hygiene Inspections – Scope' of the Code. Officers should conduct a systematic physical inspection of the premises and continue to use the chosen system of recording information.

Officers should:-

- put on their protective clothing and wash their hands properly on entering areas where open food is or is likely to be prepared and at other times during the inspection
- The food handling practices of staff should be observed to identify whether these are satisfactory and discussion undertaken with staff to assess their understanding of food hygiene. In particular staff who are responsible for the monitoring of critical control points should be interviewed to assess their understanding of critical controls, how they monitor CCP's and what action they would take if monitoring identifies that CCP's are not under control
- Officers should ensure that when they are using temperature monitoring equipment that they do not present a risk of cross contamination (i.e. the probe should be disinfected before and after insertion into food).
- Officers should make an assessment as to whether chemical or microbiological food, water or environmental samples should be taken. In this regard, Officers should make reference to the procedure for sampling.

On completion of the inspection, Officers must ensure that:-

- They have made all reasonable efforts to assess the business' operations adequately, and either that they
- Are reasonably confident that the systems in place are capable of ensuring the safety of the food; or
- Have taken action to improve the systems and their management

Note 8 - Post Inspection

The written report of the inspection should confirm all the matters discussed at the closing meeting. It should clearly differentiate between work required to comply with legal requirements and recommendations of good practice.

A record of the inspection findings and outcomes must be made on file or database, which includes the inspection report, detailed file notes, aide memoire or copies of PACE notebook notes of the inspection and other documentation obtained (e.g. menu, copy of written hazard analysis if there was one).

If a letter is sent, it should be drafted in accordance with the guidance issued at 4.5.2: 'Post-inspection Reports', and Annexe 6 of the Code. A copy of any letter should be placed on file.

Note 9 - Risk Rating

Officers must risk rate the premises following the inspection in accordance with the inspection rating scheme at Annex 5 of the Code. Officers should not reduce the inspection rating of premises originally rated as category A or B without consultation with the authority's lead officer with responsibility for food hygiene and food safety matters or agreement from a relevant senior officer. Officers should use the guidance produced by the London Food Co-ordinating Group and Association of London Environmental Health Managers when applying the Inspection Rating Scheme.

Note 10 - File Records

File records (which can also be computer based) must include the details, which are listed in Paragraph 4.5.3: 'Inspection Record Files' of the Code.

Inspection reports must be retained on file for at least 6 years or longer if marked for retention for litigation or Local Government Ombudsman Review

Note 11 - Enforcement decision

Officers must have regard to the authority's Enforcement Policy and the Enforcement Concordat when deciding what action to take as a result of the findings of the inspection/revisit.

The policy regarding revisits is detailed in the Enforcement Policy, but generally revisits are undertaken where there are significant breaches of the legislation.

Where an officer intends to take action or make recommendations that may affect the policies/procedures of a business with outlets outside the Borough, they should consult the relevant Home Authority.

6. Records

The following records are maintained as part of this procedure (where appropriate):

Allocation of Inspections

Notebook

Inspection Report

Aide Memoire

File Notes

Correspondence

Statutory Notices (or other Enforcement action)

Revised Inspection Rating

Authorisation of Senior Officer to reduce Inspection Rating