

Stirling Council – Capacity and Capability Audit

Food Law Enforcement Services

June – July 2021

Final Report issued 03 August 2021



Foreword

Audits of Local Authorities food law enforcement services are part of Food Standards Scotland arrangements to improve consumer protection and confidence in relation to food and feed. These arrangements recognise that the enforcement of UK food law relating to food safety, hygiene, composition, labelling, imported food and feeding stuffs is largely the responsibility of Local Authorities. These Local Authority regulatory functions are principally delivered through Environmental Health and Trading Standards Services.

The audit scope is detailed in the audit brief and plan issued to all Local Authorities under reference FSS/ENF/16/014 on 12 October 2016. The main aim of the audit scheme is to maintain and improve consumer protection and confidence by ensuring that Local Authorities are providing an effective food law enforcement service. This audit was developed to assess Local Authority capacity and capability to deliver the food service.

The Audit scheme also provides the opportunity to identify and disseminate good practice and provide information to inform Food Standards Scotland policy on food safety, standards and feeding stuffs.

Specifically, this audit aimed to establish:

- evaluate the organisational, management and information systems in place to ensure they are effective and suitable to achieve the objectives of the relevant food law.
- assess the capacity and capability of the Local Authority to deliver the food service.
- provide a means to identify under performance in Local Authority food law enforcement systems.
- assist in the identification and dissemination of good practice to aid consistency.
- provide information to aid the formulation of Food Standards Scotland policy.

Food Standards Scotland audits assess Local Authorities' conformance against Regulation (2017/625) on official controls performed to ensure the verification of compliance with feed or food law and the Food Law Code of Practice (Scotland) 2019: <https://www.legislation.gov.uk/eur/2017/625/contents>
Food Law Code of Practice (Scotland) | Food Standards Scotland | Food Standards Scotland

It should be acknowledged that there will be considerable diversity in the way and manner in which Local Authorities may provide their food enforcement services

reflecting local needs and priorities.

Following the audit, it is expected that for any recommended points for action the Local Authority will prepare and implement an action plan which will incorporate a root cause analysis of any non-compliance.

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1.0 Introduction

- 1.1 This report records the results of the audit of Stirling Council with regard to their capacity and capability to deliver food enforcement, under relevant sections of Retained Regulation (EU) 2017/625 on official controls performed to ensure the verification of compliance with feed or food law. The audit focused on the Authority's arrangements for meeting certain operational criteria, particularly on staffing related issues, registration and approval of food business operators, enforcement actions, interventions, procedures for carrying out official controls and transparency about their enforcement activities.
- 1.2 The final report will be made available on the Food Standards Scotland website at: www.foodstandards.gov.scot/food-safety-standards/regulation-and-enforcement-food-laws-scotland/audit-and-monitoring#la

Reason for the Audit

- 1.3 The power to set standards, monitor and audit the performance of enforcement authorities was conferred on Food Standards Scotland by Sections 3 and 25 of the Food (Scotland) Act 2015 and Regulation 7 of The Official Feed and Food Controls (Scotland) Regulations 2009.
- 1.4 In addition, Article 6(1) of Retained Regulation (EU) No 2017/625 on official controls performed to ensure the verification of compliance with feed or food law includes a requirement for competent authorities to carry out internal audits or to have external audits carried out.
- 1.5 To fulfil this requirement Food Standards Scotland has established external audit arrangements in respect of competent authorities. These arrangements are intended to ensure competent authorities are providing an effective and consistent service for the delivery of official controls and are meeting the general criteria laid out in Retained Regulation (EU) No 2017/625.
- 1.6 This audit was carried out under these arrangements following concerns being identified over the Authority's delivery of the required official controls on food law; and the request of the Authority for assistance as a result of their significant resource challenges.

Scope of the Audit

- 1.7 The audit examined Stirling Council's arrangements for official controls in relation to Retained Regulation (EU) 2017/625 on the verification of compliance with feed and food law.
- 1.8 The audit took place entirely remotely with no on-site activity.

Local Authority Background

- 1.9 Stirling Council is a unitary Authority which provides all local services for the Stirling Council area. The Local Authority is currently not office based; Officers are working remotely from their homes due to the Covid-19 pandemic.
- 1.10 Regulatory Services is managed at a third tier level through the Regulatory Services Manager as Head of Environmental Health, Trading Standards & Animal Control, Community Safety and Business Support.
- 1.11 The planned structure is designed to have the day to day operational management lead for food safety delegated to the Environmental Health team Leader who is supported by a Senior Environmental Health Officer, three Environmental Health Officer (EHOs), 0.8 of a Food Safety Officer (FSO) and a Graduate EHO. The Lead Food Officer as set out in the Food Law Code of Practice (Scotland) 2019, sits within the Senior EHO position.
- 1.12 At present, the Regulatory Services Manager and the Environmental Health Team Leader positions are being covered temporarily due to long-term absence. The Senior Environmental Health Officer (and Lead Food Officer) position is vacant and has been for a number of months, however the post is expected to be filled permanently on 13 September 2021. There are currently two EHOs within the food team, one newly qualified EHO and another agency EHO contracted for six months. There are also two graduate EHOs within the team.

2.0 Executive Summary

Capacity

- 2.1 The Audit found that the current Environmental Health resource for conducting official controls was insufficient and unable to achieve the requirements of the Food Law Code of Practice (Scotland) 2019 and Retained Regulation (EU) 2017/625 of The European Parliament.
- 2.2 There is currently a significant shortfall in Full Time Equivalent (FTE) resource at Environmental Health Officer level and no substantive Lead Food Officer. As a result of this, and specifically the Covid-19 Pandemic, resources have also been additionally deployed to service other priorities exacerbating the issue.
- 2.3 The Local Authority (LA) has not produced a current Service Plan and therefore cannot demonstrate an ability to deliver on the current FSS guidance with regards to an intervention programme.
- 2.4 The requirement to update enforcement systems to a combined Food Law Rating System that has been mandatory since 2019 has not been met. This impacts seriously on the LA's ability to deliver official controls appropriately and in compliance with Interventions Food Law Code of Practice (FLCoP) requirements.
- 2.5 A database report requested by the auditors as part of the audit was not sufficiently detailed to allow the verification of the profiling of the LA as required by the current FLCoP or the out of date Code of Practice that the LA is continuing to use.
- 2.6 The LA does not have sufficient capacity to complete the LA recovery process as laid out by FSS in ENF/21/002.

Capability

- 2.7 The Policies and Procedures supplied as evidence by the LA were out of date, in some instances going back to 2017 and quoting out of date legislation.
- 2.8 The LA does not have a documented procedure covering authorisations. Officer Authorisation Warrants were generic and not specific to individual competency. There was no reference to Retained Regulation 2017/625 or a detailed listing of powers under the Food Hygiene (Scotland) Regulations 2006.
- 2.9 Officers find that using the Management Information System (MIS) is complicated, inefficient and unreliable. Remote working is especially challenging. As such, the facility and equipment is not considered as being capable of assisting in the efficient and effective delivery of official controls.

- 2.10 Internal monitoring of Officer’s work, both qualitatively and quantitatively, has not taken place for some time due to both staff shortages and the effect of the move to working from home.
- 2.11 Officers do not have appeared to have received, for their area of competence, appropriate training enabling them to undertake their duties competently and to perform official controls and other official activities in a consistent manner.
- 2.12 Approved and high risk establishments are not receiving interventions at the required frequencies.

Level of Assurance

- 2.13 As detailed in the Audit of Enforcement Authorities Policy Document of May 2016 (reference FSS/ENF/16/007) the audit has been assigned as below:
- 2.14 The Recommendations within this report detail the weaknesses in the controls that Stirling Council should address.

<p>Insufficient Assurance</p> <p>Controls are not acceptable and have notable weaknesses.</p>	<p>There are significant weaknesses in the current risk, governance and or control procedures, to the extent that the delivery of objectives is at risk. Exposure to the weaknesses identified is sizeable and requires urgent mitigating action.</p>
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3.0 Audit Findings

3.1 The findings reported below detail both corrective and preventive actions which are not confined to addressing specific technical requirements, but also include system-wide measures. Conclusions address the compliance with the planned arrangements, the effectiveness of their implementation and the suitability of the planned arrangements to achieve the stated objectives as appropriate.

3.2 **Article 4. Designation of competent authorities**

Article	
4. 2	To ensure the consistency and effectiveness of official controls or other official activities the LA should have a current and appropriate Service Delivery Plan which has been suitably approved within the LA. At present this relates to a document which has not been

	renewed or revised is out of date for compliance with current legislation, systems and requirements.
4.2	Stirling Council have not yet transferred their delivery of official controls to the Food Law Rating System (FLRS) as required by the Interventions FLCoP 2019. This prevents the competent authority from ensuring efficient and effective coordination between all Authorities involved.

Recommendations

1. Service Delivery Plan requires to be redrafted and suitably approved.
2. Detailed planning and actions to be put in place to ensure delivery of Official Controls is transferred to the FLRS as required by the Interventions FLCoP 2019.

3.3 **Article 5. General obligations concerning the competent authorities and the organic control authorities**

Article	
5.1	The Policies and Procedures as submitted do not ensure compliance with the current FLCoP. Examples of these documents were produced for audit and were found generally not to be fit for purpose as they were obsolete and referred to outdated legislation, organisations and methods of work. Auditors were informed that the LA have not been able to ensure that these documents have been suitably redrafted to allow them to reflect current legislation and practices. Not all required policies and procedures were submitted.
5.1	The Authority is not actively conducting internal monitoring due to resourcing and IT issues. There are internal monitoring procedures for quality and quantity of enforcement, these were previously being followed but have lapsed in the absence of a Team Leader and Lead Food Officer.
5.1	The Authority is significantly understaffed in relation to current target complement, with a shortage at all levels equivalent to 2.8 FTE out of 6, with significant issues in terms of absence and retention. Those Officers who are authorised are either very recently qualified or are sourced from an external contractor. This limitation prevents official controls from being performed efficiently and effectively. It was also noted that in discussions it was felt that further resource would be required to ensure full service delivery. Given current IT constraints it was thought that an accurate FTE calculation could not be made. This would appear to result from an inability to recruit, retain and promote suitable competent staff for food official controls.

5.1	<p>The Authority has an electronic database (MIS) of their food premises within their area. At the time of audit the available records appear to show a substantial number of premises that are overdue.</p> <p>There have been no programmed interventions to high risk and approved premises in the past year. This does not comply with the agreed relaxations granted from the FLCoP as outlined in ENF/20/006 and 20/009.</p>
5.1	<p>Officers find that using the MIS is complicated, inefficient and unreliable. Remote working is especially challenging. As such, the facility and equipment is not considered as being capable of assisting in the efficient and effective delivery of official controls.</p>
5.1	<p>The Authority's database was not being kept up to date and from discussions with Officers and reports requested by the Auditors greater use of the database could help in managing the service by the provision of suitable and effective reports being available and utilised. FSS issued guidance to all Local Authorities in Scotland in March 2017 to assist in this process. The guidance is available here: fss-enf-17-010-internal-monitoring-guidance.</p>
5.1	<p>There is a correlation between establishments approved under Regulation (EC) No 853/2004 which were on the Authority's database and FSS records. However, Officers indicated that there could be other premises which could be on the approved establishments list. All approved establishments should be clearly recorded on the MIS and an identical list provided to FSS.</p>
5.1	<p>Authorisation documents are generic and do not appear to be suitably issued to all Officers. There is no reference to Retained Regulation (EU) 2017/625 or detailed listing of specific powers under the Food Hygiene (Scotland) Regulations 2006.</p>
5.4	<p>Officers have responsibility for a variety of food business operators, including those approved under Regulation (EC) No 853/2004 - laying down specific hygiene rules for food of animal origin. For Officers carrying out interventions in these establishments the FLCoP requires competence in the inspection of specialist or complex manufacturing processes.</p> <p>Only suitably trained and competent Officers should be conducting interventions at approved establishments.</p> <p>. Auditors also note that in order to deal with an incident response at an approved establishment, two Officers from another Local Authority were required to assist. The scoring previously recorded by a contractor at this establishment could be considered inappropriate for compliance with the FLCoP that was in use at the time.</p>

Recommendations
3. To carry out a workforce review with an aim of working towards a full and capable staff complement.
4. To immediately ensure only suitably qualified and competent Officers are conducting interventions at approved establishments.
5. Review and update all Policies and Procedures as a matter of urgency.
6. To review and implement Internal Monitoring Procedures.
7. To review database content and to ensure premises listing is accurate and up to date both at LA and FSS level.
8. To review use of the MIS to ensure accessibility and compliance with the FLCoP or Regulation 2017/625 and to consider fitness for purpose.
9. Authorisation documents should be reviewed and re-issued to ensure compliance with the FLCoP and Retained Regulation (EU) 2017/625.
10. Considered production of a training strategy which will ensure all staff are appropriately trained and competent to perform the Controls for which they are responsible.

3.4 **Article 10. Operators, processes and activities subject to official controls**

Article	
10.2	There is a correlation between establishments approved under Regulation (EC) No 853/2004 which were on the LA's database and FSS records. However, Officers indicated that there could be other premises which could be on the approved establishments list. All approved establishments should be clearly recorded on the MIS and an identical list provided to FSS.

Recommendations
See recommendation 7.

3.5 **Article 12. Documented Control Procedures**

Article	
12.1	Official Controls should be performed in accordance with documented procedures. Those provided when requested did not

	fully comply with the current FLCoP, FSS Guidance or Retained Regulation (EU) 2017/625.
12.2 12.3	The LA should have a document control verification procedure in place and take corrective actions in all cases where the procedure requires updating. None was provided as evidence.

Recommendations	
See recommendation 5.	
11. To ensure a document control verification procedure is in place.	

4.0 Annex A – Action Plan

Action Plan for Stirling Council’s Capacity and Capability Audit, June – July 2021

STIRLING COUNCIL Recommended Point for Action	Planned Actions	Target Date for Completion	Responsible Officer(s)
<p>1. Service Delivery Plan requires to be redrafted and suitably approved.</p>	<p><i>A new Service Delivery Plan is developed and approved.</i></p> <ol style="list-style-type: none"> 1. Additional resource is secured to develop the Service Delivery Plan; a specialist recruitment process has been initiated; officers will continue to liaise with FSS to identify suitably experienced and competent resource. 2. Development of Service Delivery Plan in conjunction with Service Manager, and consultation with FSS, Environmental Health Officers and Legal Services. 3. Approval of Service Delivery Plan by Organisational Governance Board (Senior Officer Board for operational requirements); this meeting is formally recorded, and record will be shared with FSS. 	<p>31 August 2021</p> <p>31 December 2021</p> <p>31 January 2022</p>	<p>Senior Manager</p> <p>Senior Manager & Service Manager</p> <p>Senior Manager</p>

STIRLING COUNCIL Recommended Point for Action	Planned Actions	Target Date for Completion	Responsible Officer(s)
	<p>4. Ensure the Service Delivery Plan is effectively communicated to the Service team, with formal record; and referred to as a standing item as part of the scheduled programme of Team Meetings. The Service Delivery Plan, will be reviewed with FSS on an ongoing basis.</p> <p>5. The plan is reviewed on an annual basis, and the revised Plan is formally approved by Organisational Governance Board.</p>	<p>1 February 2022 Further ongoing commitment</p> <p>30 September 2022</p>	<p>Service Manager, Team Leader</p> <p>Senior Manager</p>
<p>2. Detailed planning and actions put in place to ensure delivery of Official Controls is transferred to the FLRS as required by the Interventions FLCoP 2019.</p>	<p><i>Official Controls are delivered to the Food Law Rating System</i></p> <p>1. A scoping exercise is completed to identify business changes and systems required</p> <p>2. A detailed project plan will be developed and recorded to ensure that the changes required are made in a time bound and controlled way.</p> <p>3. Allocation of resource to support change</p>	<p>31 August 2021</p> <p>01 October 2021</p> <p>31 August 2021</p>	<p>Service Manager & Team Leader</p> <p>Service Manager/Team Leader</p> <p>Senior Manager & Service Manager</p>

STIRLING COUNCIL Recommended Point for Action	Planned Actions	Target Date for Completion	Responsible Officer(s)
	4. Initiation and delivery of change plan	1 October 2021 (pending review)	Team Leader/Lead Food Officer
3. To carry out a workforce review with an aim of working towards a full and capable staff complement.	<p><i>Deliver a full and capable staff compliment</i></p> <ol style="list-style-type: none"> 1. Conclude an initial assessment (underway), identifying further additional staff resource requirement and skills. 2. Commence and complete recruitment of resource from initial assessment 3. Confirm commencement of appointed Lead Food Officer (Senior EHO) 4. Undertake detailed workforce assessment, using the FSS Resource Allocation Tool for officer demand, identifying any further resource requirements to support long term resilience, including strategy for succession planning, and including graduate recruitment 5. Undertake required recruitment process 	<p>06 August 2021</p> <p>Underway, completion TBC</p> <p>13 September 2021</p> <p>15 October 2021 (pending review)</p> <p>31 October 2021 (pending review)</p>	<p>Service Manager & Team Leader</p> <p>Service Manager</p> <p>Service Manager</p> <p>Service Manager, Team Leader, Lead Food Officer</p> <p>Team Leader/Lead Food Officer</p>

STIRLING COUNCIL Recommended Point for Action	Planned Actions	Target Date for Completion	Responsible Officer(s)
4. To immediately ensure only suitably qualified and competent Officers are conducting interventions at approved establishments.	<p>Only suitably qualified and competent officers will conduct interventions at approved premises. (This applies equally to those who are directly employed, to temporary staff and to those employed by or as contractors.)</p> <p>1. The Service Manager will ensure that only suitably qualified and competent officers will conduct interventions at approved premises. This may include use of competent and qualified consultant resource.</p>	28 July 2021	Service Manager
5. Review and update all Policies and Procedures as a matter of urgency.	<p>All Policy and Procedure documents are fully reviewed and current.</p> <p>1. A list of required documents is compiled.</p> <p>2. A prioritised review is programmed and commenced.</p> <p>3. Completed documents have appropriate version controls in place, and are identified on Sharepoint.</p>	<p>31 August 2021</p> <p>01 September 2021</p> <p>31 December 2021</p>	<p>Team Leader</p> <p>Team Leader</p> <p>Team Leader/Lead Food Officer/Business Management Co-ordinator</p>

STIRLING COUNCIL Recommended Point for Action	Planned Actions	Target Date for Completion	Responsible Officer(s)
	<p>4. Training requirements associated with documents are identified, and completed.</p> <p>5. Documents have whole team review, through team meeting or toolbox talks; both prior to finalisation and at finalised document stage.</p> <p>6. A review programme is in place for completed documents.</p>	<p>31 December 2021</p> <p>31 December 2021</p> <p>31 March 2022</p>	<p>Team Leader/Lead Food Officer</p> <p>Lead Food Officer</p> <p>Lead Food Officer</p>
<p>6. To review and implement Internal Monitoring Procedures.</p>	<p><i>Internal monitoring procedures are clearly defined, recorded and reviewed.</i></p> <p>1. Review existing internal monitoring procedures.</p> <p>2. Develop revised internal monitoring procedures, ensuring that these are proportionate documented, and sufficient to provide assurance that procedures are being followed, with appropriate document controls and available on Sharepoint.</p>	<p>30 September 2021</p> <p>31 December 2021</p>	<p>Team Leader</p> <p>Team Leader/Lead Food Officer/Business Management Co-ordinator</p>

STIRLING COUNCIL Recommended Point for Action	Planned Actions	Target Date for Completion	Responsible Officer(s)
	3. Confirm arrangements for quality management audits, and internal audits within the service.	31 December 2021	Senior Manager/Service Manager/Internal Audit Team Leader/Business Management Co-ordinator
7. To review database content and to ensure premises listing is accurate and up to date both at LA and FSS level.	<p><i>The database of food premises is up to date, at both Authority and Food Standards Scotland level.</i></p> <p>1. The database is fully reviewed, cleansed and updated to ensure the premises listing is accurate.</p> <p>2. Undertake review with Uniform (database provider); to ensure that system is operating effectively that all relevant functionality is harnessed, and information held by the Authority and FSS is common. Initial discussion with Uniform identifies that the Council's current system is the most up to date version, and that there is no issue with functionality of the system in line with current Code of Practice.</p> <p>3. Identify and address any specific resource and training needs for the database management, within the</p>	<p>30 September 2021</p> <p>31 August 2021</p> <p>30 September 2021</p>	<p>Service Manager/Team Leader</p> <p>Senior Manager/Service Manager</p> <p>Senior Manager / Service Manager</p>

STIRLING COUNCIL Recommended Point for Action	Planned Actions	Target Date for Completion	Responsible Officer(s)
	Service. This will include procuring external support from Uniform to assist with system development, and officer training and development.		
8. To review use of the MIS to ensure accessibility and compliance with the Food Law Code of Practice or Regulation 2017/625 and to consider fitness for purpose.	<p><i>Ensure that the database system is fit for purpose, and complies with the Food Law Code of Practice or Regulation 2017/625</i></p> <ol style="list-style-type: none"> 1. Undertake review with Uniform to ensure all relevant functionality is harnessed, identify additional actions required, and develop a plan for implementation. 2. Develop and deliver plan to optimise Uniform. This will be done alongside the provision of training for those staff who will use the system. Identification of mobile working opportunities will also be undertaken. 3. Identify specific resource requirements, training and system administration responsibilities. 4. Develop process and procedures to support system administration. 	<p>31 August 2021</p> <p>31 December 2021</p> <p>31 August 2021</p> <p>15 October 2021</p>	<p>Senior Manager/Service Manager</p> <p>Service Manager/Team Leader</p> <p>Service Manager</p> <p>Team Leader/Lead Food Officer</p>

STIRLING COUNCIL Recommended Point for Action	Planned Actions	Target Date for Completion	Responsible Officer(s)
	5. Longer-term monitoring arrangements are in place for the system, and identified in the Internal Monitoring Procedures, to ensure that the system is being used as planned, and that data is being accurately captured and appropriately retained.	31 December 2021	Team Leader/Lead Food Officer
9. Authorisation documents should be reviewed and re-issued to ensure compliance with the Food Law Code of Practice and Regulation 2017/625.	<p><i>Officer authorisation documents are suitably detailed, and reference Regulation 2017/625, and specific powers under the Food Hygiene (Scotland) Regulations 2006.</i></p> <p>1. Revised Authorisation of Enforcement Officer document is prepared to ensure only appropriate delegations are granted.</p> <p>2. Authorisation documents are issued, along with appropriate delegations.</p> <p>3. A full record is available on Sharepoint, with appropriate review points on document.</p>	<p>Complete</p> <p>11 August 2021</p> <p>13 August 2021</p>	<p>Legal Services Manager/Service Manager</p> <p>Service Manager/Team Leader</p> <p>Team Leader</p>
10. Considered production of a training strategy which will ensure all staff are	<i>All officers are appropriately trained for the Controls for which they are responsible, with on-going development support. The</i>		

STIRLING COUNCIL Recommended Point for Action	Planned Actions	Target Date for Completion	Responsible Officer(s)
appropriately trained and competent to perform the Controls for which they are responsible.	<p><i>minimum on-going training will be 10 hours per year. Records of all training, qualifications etc. will be held.</i></p> <ol style="list-style-type: none"> 1. A review of existing training and development requirements is completed alongside a skills audit, and identified for each role within the Service to ensure Authorised Officers receive relevant and structured on-going training. 2. A training and development plan matrix is completed, and the documents are available on Sharepoint, with appropriate controls and review points. 3. An assessment of outstanding training and development requirements is undertaken for all staff. 4. A detailed training and development plan, for any outstanding training requirements is completed, and training initiated thereafter. 5. Confirmation of non-technical training and developments requirements, for 	<p>30 September 2021</p> <p>15 October 2021</p> <p>15 October 2021</p> <p>31 October 2021</p> <p>30 November 2021</p>	<p>Service Manager/Team Leader</p> <p>Team Leader / Organisational Development Team Leader</p> <p>Team Leader/Lead Food Officer/Organisational Development Team Leader</p> <p>Team Leader/Lead Food Officer/Organisational Development Team Leader</p>

STIRLING COUNCIL Recommended Point for Action	Planned Actions	Target Date for Completion	Responsible Officer(s)
	<p>example leadership, performance management, project management are agreed within individual staff development plans.</p> <p>6. Newly qualified, and Officers returning to Food Law enforcement, will be supervised until they are considered to work unsupervised.</p>	28 July 2021	<p>Service Manager/Team Leader</p> <p>Team Leader/Lead Food Officer</p>
11. To ensure a document control verification procedure is in place.	<p><i>All documents associated with service delivery have appropriate controls in place.</i></p> <p>1. A document control process is full adopted by the service, and awareness and training in place through team meetings and toolbox talks or similar.</p>	30 September 2021	Service Manager/Business Management Co-ordinator

5.0 Acknowledgements

The Audit Assurance Team would like to acknowledge the help and co-operation of all staff involved for their assistance while conducting this audit.

Auditors: Graham Forbes
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Food Standards Scotland
Audit Assurance Branch

03 August 2021

Abbreviations

EHO	Environmental Health Officer
EU	European Union
FLCoP	Food Law Code of Practice
FLRS	Food Law Rating System
FSO	Food Safety Officer
FSS	Food Standards Scotland
FTE	Full Time Equivalent
LA	Local Authority
MIS	Management Information System