GUIDANCE FOR LOCAL AUTHORITIES ON HOW TO UNDERTAKE AN INTERNAL VALIDATION OF FOOD LAW ENFORCEMENT DATA

Introduction

1. This guidance is relevant to all future monitoring returns submitted from April 2005 onwards. It draws on the findings of the programme of focussed audits on the provision of statistical data by LAs, and offers advice and suggestions. It aims to help all LAs to achieve the robustness and quality of the returns from the LAs which have shown the best practice .

2. This guidance follows earlier guidance given by the Agency to all LAs, on:

    (a) the interim changes to the monitoring form, for 2004/05 and 2005/06, which were announced in a letter on 12 August 2004 to all Heads of Service;
    (b) the revised statutory Code of Practice, on which guidance was issued to IT companies on 24 November 2004, and to Local Authorities on 12 January 2005 (later dates apply in Northern Ireland and in Wales); and
    (c) the findings of FSA audit programmes, particularly those of the programme of focussed audits on the provision of statistical monitoring data.

3. We do apologise for the fact that there have been successive documents. This has stemmed from the way in which issues have arisen as the project to review of the monitoring system has developed. We do acknowledge the need to consolidate the separate pieces of guidance, and that will be addressed as soon as possible.

4. Examples of reports for carrying out validation checks on the accuracy of food premises databases and enforcement activity are given. Effective internal monitoring of data can help in producing internal management information and is likely to significantly improve the accuracy of monitoring statistics submitted to the Agency.

5. Local authority officers who are responsible for compiling and checking the monitoring data are strongly advised to review the software reports that have previously been used to extract the relevant information from their local database, to take account of the changes mentioned at paragraph 2 above. In order to ensure that the basic report infrastructure is correct it is recommended that this exercise should be undertaken in conjunction with the authority's IT system support officers and the software provider.

Database

6. One significant problem area identified during the programme of focussed audits on the provision of statistical monitoring data related to the accuracy of stored information on authorities' food premises databases. Discrepancies were identified in the following areas of enforcement activity:

    - the coding of premises type;
    - the recording of planned and achieved inspections;
    - the recording of enforcement actions taken;
    - the recording of complaints handled, and
    - the recording of samples taken.

7. It is therefore important that an up to date database is regularly maintained for the food and feeding stuffs premises in your area in order for the monitoring returns to be accurate. An effectively implemented database maintenance procedure should ensure that all relevant premises in an Authority's area are entered on the database and included in inspection programmes or alternative strategies for enforcement. The management of a food and feeding stuffs premises database should include provisions for the controlled entry of new premises and the deletion of closed premises, as well as the regular use of a variety of checks to ensure that stored data is accurate and up to date. This can include checking of local media information, comparison with other local/national databases and effective internal monitoring of data entry. Examples of good practice for database maintenance procedures can be found on the Agency's website at: *www.food.gov.uk/enforcement/auditscheme/goodpractice/*.

8. In addition to this, District Authorities should ensure that they regularly provide the County Council with any changes to their premises profile and likewise County Councils should also ensure that they receive the relevant information from their composite districts. Unitary authorities should also regularly check that there are no significant anomalies between their premises profiles for food hygiene and food standards, where separate database profiles are maintained.

Validation Checks

9. With the change to annual returns, we would strongly recommend that validation exercises on monitoring data are undertaken throughout the year, rather than only at the end of the financial year, once all data has been collected. In this way any data entry errors can be corrected as they happen, thus avoiding the difficulties of unravelling and exploring historical data several months after it has been entered on the database.

10. It is important to note that validation checks are of limited value if enforcement activity data is not recorded, coded and mapped on the database in accordance with the guidance on the completion of the monitoring form that is contained in Chapter 4 of the Framework Agreement (as amended).

11. The following reports may assist with database validation by highlighting problems such as coding anomalies, data entry errors, duplicate premises, closed premises and premises that have been erroneously unitised:

    - List of codes used for data entry in relation to food and feeding stuffs – to include main activity codes and those used to record inspections, revisits, all other visits and all follow up actions;

    - List of premises with a food risk rating but no food code;

    - List of premises with a food risk rating and no next inspection date;

    - List of premises with a next food visit/inspection date but no food risk rating;

    - List of premises with a food inspection code and a blank risk assessment category;

    - List of premises with a particular word in the business name, e.g. ‘Kwik’, to identify duplicate entries;

    - List of Manufacturers as defined by the FSA return - to include premises details, risk category and next inspection date;

    - List of Manufacturers selling mainly by retail as defined by the FSA return - to include premises details, risk category and next inspection date;

    - List of Approved Premises to check whether coded correctly for premises type;

    - List of Licensed Butchers to check whether coded correctly for premises type;

    - List of premises that have closed or ceased trading;

    - Lists of Approved and Registered feeding stuffs premises by main activity category.

12. Some of these reports are often requested by the Agency when it conducts an audit of an individual authority. The specific reports requested depend on

the type of LA and the nature of the particular audit. The reports may also be requested for random checking as part of the overall process of analysing local authority data.

13. To maintain the integrity of the database and minimise the risk of corruption or loss of data, backup and security systems should be in place. The reliability of the backup system should be periodically verified by requesting that IT support perform a test restore. The levels of password protection should also restrict data entry and deletion to competent staff.

Inspections and Visits

14. Local authorities should review their inspection and visit codes to ensure that they adequately meet the requirements of the revised Code of Practice (parts 4.1.2 and 4.1.3) in relation to the recording of primary and secondary inspections.

15. Below are examples of individual reports which can be run for specific date ranges and can be used to cross check the data collected for compiling the monitoring return:

- List of premises that have closed or ceased trading;
- List of risk category A, B and C (formerly high, medium and low risk) premises for food standards, with premises type, using the LACORS risk assessment scheme compared to the previous Code of Practice scheme, where LAs have changed over from one to the other:
- List of all A risk rated premises (whether food hygiene and/or food standards) with next inspection date and premises type;
- Reports detailing inspection activities of specific officers against the inspection programme;
- List of overdue inspections with premises type, risk category and dates of last and next inspections;
- Lists of revisits after planned inspections and other revisits, with premises type and risk category;
- Lists of feeding stuffs inspections and revisits achieved against premises classification.

16. It is also useful to compare premises and enforcement activity figures produced for the monitoring returns with those reported internally in service

plans, as figures for these are often produced using different database reports.

17. Authorities should also regularly compare the following points against the planned inspection programme:

- ongoing inspection data,
- closed premises,
- premises subject to alternative enforcement strategies and
- premises which change risk category from A for food hygiene during the year.

18. This should enable data entry errors to be corrected and in year changes to the inspection programme to be recorded, therefore ensuring that the authority does not mistakenly report over 100% planned inspections achieved at the end of the year. Particular points to note to prevent inaccurate reporting include:

- If LAs are planning to complete outstanding inspections from the previous year in the following year, these should be included in the planned programme for the new year and then reported when completed, as achieved against the programme. If however, any outstanding inspections from the previous year have not been included in the planned programme, inspections of these premises should not be reported as achieved against the programme in column M of Tables 2.1 and 2.2, and should only be reported in line 2 of Tables 2.1 and 2.2;

- Where LAs have included unrated premises in their planned inspection programme, the completed inspections of these should be reported as achieved against the line for unrated premises in the programme (in column M of tables 2.1 and 2.2). All other inspections of unrated premises should only be reported in line 2 of Tables 2.1and 2.2;

- Inspections of premises that open during the year and therefore receive an unplanned inspection, should not be reported as achieved against the planned programme in column M of Tables 2.1 and 2.2, and should therefore only be reported in line 2 of Tables 2.1and 2.2.

Enforcement Action

19. The use of validation reports listing enforcement actions by officer across specified date ranges can help to ensure that all formal enforcement activity is being recorded on the monitoring returns. However, where authorities maintain paper records of formal enforcement, a validation exercise to ensure that all actions have been transcribed on to the monitoring form is essential, to prevent under reporting.

20. All communication with businesses where infringements of legislation have been noted should be recorded as written warnings. As a significant proportion of post-inspection letters/reports are likely to refer to contraventions, a check of the ratio of written warnings to inspections may be a useful indicator of any possible under-reporting of this area of work.

21. The monitoring form requires information about the number of establishments that have been the subject of formal enforcement, rather than the number of individual enforcement actions. This is based on the requirements of the European Union under the Official Controls directive, 89/397/EEC. Therefore each action type should only be reported once in any given year per premises. The validation reports that list all actions taken should therefore be compared with the figures entered on to the return to ensure that premises do not appear more than once against each particular action type, resulting in the over-reporting of formal enforcement activity.

Inspection Outcomes

22. It is also important to monitor that the inspection activity data entered by officers is correct and this should be included as part of the overall internal monitoring carried out, as required by paragraphs19.1-19.3 of the Standard. Good practice examples of internal monitoring procedures can be found on the Agency's website at: www.food.gov.uk/enforcement/auditscheme/goodpractice/.

Complaints

23. In order to ensure that complaints are recorded on the monitoring form and appear only once in the most appropriate category, the following validation reports can be used for cross checking:

- List of food/feeding stuffs complaints including complaint reference, date and type;

- List of complaints about the hygiene of premises, including premises address, complaint reference and date.

24. Monitoring how officers enter data can also be effective in checking that correct codes are being used to record complaints and other reactive work.

Sampling

25. It is also important to monitor how officers enter data in relation to sampling as it will identify whether samples are being correctly coded as formal or informal and whether the results are being recorded. Running the following

reports can be used to check whether the sampling figures compiled for the monitoring return are correct and complete:

- Lists of formal and informal food samples with sample reference, date, type of food, and whether result was satisfactory or not;

- Lists of formal and informal samples of feeding stuffs taken, and whether result was satisfactory or not.

Head of Service responsibilities

26. As Head of Service, you will be responsible for ensuring that a system is in place to ensure the accuracy of data submitted to the Agency. We therefore recommend that you take action to ensure that:

    (a) officers who enter data receive appropriate training and monitoring to make sure that there is a consistent approach (particularly to coding);
    (b) an independent person carries out reality checks on the data as it is being recorded; and
    (c) where possible, a manager with technical experience checks that the final data is correct, before discussing the results with you as the Head of Service prior to their submission.

Your Feedback

27. To help us to provide better support to you, we should be grateful for your views on this guidance. Please sent any comments on:

    - the guidance itself; or
    - any points which could be included in future versions of our “Frequently Asked Questions” (available on our webite); or
    - any need for specific training

    to the monitoring mailbox: la.monitoring@foodstandards.gsi.gov.uk.