

**FOOD HYGIENE (ENGLAND) REGULATIONS 2006  
FOOD SAFETY ACT 1990**

**FOOD SAFETY  
INTERVENTION POLICY**

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## **INTERVENTION POLICY**

### **1 GENERAL**

#### 1.1 Statement of Objectives

This document will provide a framework for achieving a consistent approach to food hygiene interventions.

#### 1.2 Scope and Definitions

- (a) The document relates to premises where the legislative requirements are contained in The Food Hygiene (England) Regulations 2006
- (b) These Regulations cover both food businesses establishments requiring registration and which are subject to approval.
- (c) Official Controls: any form of control for the verification of compliance with food law and include inspections, monitoring, surveillance, verification, audit and sampling.

#### 1.3 References

- (a) Food Law Code of Practice (England) and associated guidance
- (b) LACORS:
  - (i) Guidance on Food Hygiene Inspections
  - (ii) Commercial Use of Domestic Premises
  - (iii) Women's Institutes Uniformity of Approach
  - (iv) Guidance on Risk Assessment
  - (v) Monitoring Systems June 1995
  - (vi) Guidance on Inter Authority Auditing
- (c) LACORS: Advice on issues of interpretation and application of the Regulations.

#### 1.4 Operational Procedures

Operational Procedures in respect of Food Safety Interventions will be audited and reviewed on a regular basis.

## 1.5 Review

This policy will be subject to annual review.

## 2 MANAGEMENT SYSTEMS

### 2.1 Purpose

To monitor the nature and quality of interventions undertaken by authorised officers to ensure, so far as practicable, that inspections are carried out to a uniform standard and that the interpretation and action taken is consistent.

### 2.2 Qualifications of Authorised Officers

Refer to Enforcement Policy (1.7).

### 2.3 Systems

The Council's Management Systems will consist of the following:

- (a) Verification visits by Principal Environmental Health Officer (Food Safety) with each authorised officer yearly to determine compliance with the Intervention Policy (See Intervention Procedure)
- (b) Report Sheet to be signed by authorised officer, Principal Environmental Health Officer (Food Safety).
- (c) All Hygiene Improvement Notices and other statutory notices e.g. Remedial Action Notices, Detention Notices etc and where possible Hygiene Emergency Prohibition Notices will be verified by a Principal Environmental Health Officer or Environmental Health Officer with over two years experience in food safety work before service (see Enforcement Policy 1.8)
- (d) All informal letters will be reviewed by Principal Environmental Health Officer (Food Safety)
- (e) LACORS Standard Phrases are in use.
- (f) Officers will be provided with copies of all relevant LACORS advisory documents, legislation, Food Law Code of Practice (England) and associated guidance, all have access to the internet and technical libraries.

- (g) Regular and minuted team meetings / briefings will take place to discuss and disseminate information.
- (h) Operational Procedures on Food Safety matters will be audited and reviewed on a regular basis.
- (i) Authorised officers will be encouraged to attend training courses to develop proficiency and expertise. Training in accordance with the Food Law Code of Practice (England) Section 1 Chapter 1.2 Qualifications and Experience will be the minimum.

#### 2.4 Inter Authority Auditing

Inter Authority auditing throughout Cheshire is co-ordinated by the Cheshire Food Safety Group.

#### 2.5 Intervention Programming

The “Authority” computer software system will be used to carry out the scheduling of interventions based on the risk assessment scheme in the Food Law Code of Practice (England) Section 4 Interventions, Chapter 4.1 Interventions, Annex 5 Intervention Rating Schemes. The data generated is used to determine the star rating for the Scores on the Doors web site.

The Principal Environmental Health Officer (Food Safety) will ensure that all new food registrations are entered onto the “Authority” system within 10 working days of receipt and that where necessary the business is inspected within 28 days of receipt.

### **3 PURPOSE OF INTERVENTION**

#### 3.1 A food hygiene intervention has three main purposes

- (a) To identify potential hazards and assess the risks to public health arising from the activities of a food business
- (b) To assess the effectiveness of management control
- (c) To identify contraventions of food hygiene law and seek to have them corrected

#### 3.2 This requires the adoption of a risk-based approach to intervention. Warrington carries out Inspections or Partial Inspections as interventions.

#### 3.3 The intervention is broken down into:

Planning for the Intervention  
Preliminary Interview  
The Intervention  
Post Intervention Interview  
Post Intervention Administration  
Revisit inspection (if required)

## **4 THE INTERVENTION PROCEDURE**

### **4.1 Planning the Intervention**

- (a) Review the Previous History and recommendation of next intervention type.

The following should be taken into account:

- \* Previous risk assessment score
- \* Individual risk assessment criteria
- \* Complaints
- \* Management systems
- \* Layout and operations
- \* Response to previous intervention outcomes

- (b) Plan the Interventions

\* Most interventions will be carried out unannounced, however in the case of Crown Premises this must be by arrangement. In other cases, e.g. large manufacturers, hospitals, etc, it is left to the Officer's discretion. Interventions should be carried out at optimum times. See LACOTS Food Hygiene Inspections: Advance Notice of Inspection.

\* The following equipment is issued individually to all authorised Officers involved in programmed interventions

Pocket Torch  
Food Grade Coats  
Food Grade Hair coverings  
Food Thermometer and Probes, Sterile Wipes  
Digital Camera  
Disinfectant Hand Gel  
Blue waterproof plasters  
Infra Red Temperature Guns  
Sterile spoons and knives

Thermometers, chisel probes and infra red guns should be checked quarterly using the reference thermometer and calibration caps and where prosecution is being considered before the inspection. The reference thermometer and calibration caps will be calibrated annually by the manufacturer.

Batteries should be changed regularly including reference thermometer. (See operational procedure)

- \* The following equipment is available for use:

Temperature data loggers  
Sampling equipment

Any temperature monitoring for prosecution purposes must be carried out with the Comark Food Thermometer. All other monitors would be used for corroboration only

- \* Protective clothing provided should be worn at all times in food preparation areas where open food is handled.
- \* The appropriate Inspection Sheet must be used in conjunction with the Official Evidence Notebooks.
- \* The 'Report of a Food Hygiene Intervention' pad to be carried.
- \* The 'Emergency Notice Pack' to be carried.

#### 4.2 Preliminary Interview

Wherever practicable, the food business operator or other suitable management representative should be interviewed prior to inspecting the premises. The Officer should aim to:

- \* Introduce himself/herself and show identification.
- \* Explain to the interviewee the purpose and the approach to the inspection
- \* Make an initial assessment of the food safety hazards associated with the business: the risk to public health and the critical areas including, type and quantity of food handled, number and type of consumers and methods of handling/processing.
- \* Assess the adequacy or otherwise of any hygiene system. Any unforeseen potential hazard identified through the assessment should be discussed during or at the conclusion of the visit and confirmed in writing.

- Consideration of available documentation/records relating to food safety management systems
- examples include:

- Management structure
- Quality Assurance procedures/HACCP
- Details of any food safety management system
- Monitoring systems
  - Temperature Control
  - Cleaning and Disinfection
  - Hygiene Checklists
- Food Hygiene Training Policy
- Product Specifications
- Supplier Auditing
- Schedules
  - Cleaning
  - Maintenance
- Contracts
  - Pest Control
  - Waste Control
- Relevant complaint records

Authorised Officers must have regard to the confidentiality of documentation provided in the course of an intervention

#### 4.3 The Inspection

- The intervention process will be dependent upon the type and nature of the food business. However, the underlying principle of any intervention should be the consideration of food safety hazards and an assessment of risk NOT merely to identify contraventions of legislation.
- Where a satisfactory food safety management procedure (HACCP) or for lower risk businesses adequate controls are not in place the authorised officer should carry out a fuller visual and physical examination and have special regard to the hazards associated with the business to identify those areas which require closer scrutiny.
- Businesses, especially larger ones, can be broken down into units for intervention purposes, especially where activities present different degrees of hazard and risk.
- In assessing compliance, the officer shall give due consideration to any relevant Industry Guides to Good Hygiene Practice and have regard to any other relevant centrally issued guidance.

- (e) In respect of E rated premises where no change of owner or nature of the business has taken place from the previous inspection the officer should only carry out a partial inspection.

#### 4.4 Post Intervention Interview

On completion of the intervention the authorised officer must (if not already done during the inspection)

- (a) Discuss significant findings with the food business operator or other relevant person
- (b) Preferably 'walk' the operation with that person
- (c) Make a clear distinction between contraventions and recommendations of good practice
- (d) Explain what enforcement action is proposed (if any)
- (e) Discuss solutions to problems and timescales for action
- (f) Complete 'Report of a Food Hygiene Intervention' form including premises rating (one copy to be placed on premises file and the other sent to the head office if necessary).

#### 4.5 Post Intervention Administration

- (a) See Enforcement Policy (3) regarding types of enforcement options available
- (b) All informal letters / statutory notices generated by the intervention must be completed and dispatched within ten working days of the intervention date
- (c) Update “Authority” system
- (d) Where the food business operator of a food business does not understand or agree with the actions proposed or with the behaviour of authorised officers, he/she should be made aware of local arrangements to refer complaints to the Council's and any appropriate appeals mechanism
- (e) The officer should try to ensure that, where the first language of the business proprietor is not English, the legal consequences of failing to comply with the contraventions and in particular statutory notices are

understood - see Enforcement Policy (5.5c) "Untranslated Food Safety Act Material"

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- (f) The officer shall liaise with the 'home authority' of a company where any offences identified during an inspection are or appear to be associated with the company's centrally defined policies and procedures.
  - (g) All records shall be kept for at least 6 years unless the records or reports have been marked for longer retention because of litigation or Local Government Ombudsman Review.

#### 4.6 Revisit Inspections

Revisit inspections to premises is carried out as required by the Food Law Code of Practice (England) Section 4 Inspections, Chapter 4.2 The Inspection:

- Where premises fail to comply with significant statutory requirements
- Service of Hygiene Improvement or Hygiene Emergency Prohibition Notices

Revisit inspections for failure to comply with statutory requirements should, whenever practical, be undertaken by the officer who undertook the original intervention.