Glasgow City Council Internal Audit Section
Committee Summary
Financial Services: Catering and Facilities Management – Education Food Safety

Item 2 (a)

30th November 2022

1 Introduction

1.1 As part of the agreed Internal Audit plan we have carried out a review of Catering & Facilities Management (CFM) – Education Food Safety arrangements.

1.2 School catering services are provided by CFM within Financial Services. It is essential that the food provided to children within educational establishments meet the appropriate food safety standards and it is the Council's responsibility to ensure that these standards are maintained.

1.3 There are more than 1,300 children across the GCC educational estate who are known to have food allergies, and these must be catered for in a safe manner.

1.4 The scope of the audit was to ensure there are sufficient and appropriate controls in place covering:

- The scope and maintenance of food safety management standards and accreditations.
- Food safety procedures and guidance.
- Food safety training and communication processes.
- The arrangements for ensuring food safety standards within the supply chain.
- The processes for identifying allergies within the school roll and ensuring that these are adhered to by catering staff at mealtimes.
- Record keeping and data retention arrangements.
- Incident response management and lessons learned.

1.5 The scope of the audit included a review of compliance with the Food Safety Manual and associated procedures but did not include an assessment of compliance with food safety legislation.

2 Audit Opinion

2.1 Based on the audit work carried out a reasonable level of assurance can be placed upon the control environment. The audit has identified some scope for improvement in the existing arrangements and three recommendations which management should address.

3 Main Findings

3.1 Key controls are in place and generally operating effectively. There are appropriate documented food safety guides and procedures in place. The Food Safety Manual contains a system to meet legislative requirements. The manual is regularly reviewed, refreshed, and signed off by the Executive Director of Finance.

3.2 We conducted site visits at a primary school and two secondary schools, and all demonstrated compliance with food safety standards through the provision of Environmental Health Food Hygiene pass certificates.

3.3 We also selected a sample of three food suppliers and found that all were British Retail Consortium (BRC) certified, which demonstrates conformity with relevant food safety guides/legislation.

3.4 However, our audit testing found that there are some areas of non-compliance. We were informed that due to impact of Covid, staff training is behind schedule and refresher training is due to be provided. A training timetable has been developed to address training needs.

3.5 For monitoring, quarterly performance reports and an annual report are provided to senior management. Due to Covid however the last annual report was produced in 2019 and it was confirmed that food safety team are in the process of collating a report for the current year.

3.6 Area Operations Managers are required to carry out annual audits. Within the sample of three schools, there was insufficient evidence to conclude that routine annual audits are being carried out.

3.7 Within the sample of three schools, the primary school keep individual folders where child names and allergies are clearly displayed. However, although included in the medical diet guidance, we found that no photo ID of students with special dietary requirements, was held which makes it difficult for new members of team to identify relevant students.

3.8 An action plan is provided at section four outlining our observations, risks and recommendations. We have made three recommendations for improvement. The priority of each recommendation is:

Priority	Definition	Total
High	Key controls absent, not being operated as designed or could be improved. Urgent attention required.	2
Medium	Less critically important controls absent, not being operated as designed or could be improved.	1
Low	Lower level controls absent, not being operated as designed or could be improved.	0
Service Improvement	Opportunities for business improvement and/or efficiencies have been identified.	0

3.9 The audit has been undertaken in accordance with the Public Sector Internal Audit Standards.

3.10 We would like to thank officers involved in this audit for their cooperation and assistance.

3.11 It is recommended that the Head of Audit and Inspection submits a further report to Committee on the implementation of the actions contained in the attached Action Plan.

4 Action Plan

No.	Observation and Risk	Recommendation	Priority	Management Response
Key Control: Training on food safety is undertaken by all staff and this is refreshed on a regular basis or sooner where necessary (e.g., when legislation changes)				
1	Food safety training applies to all staff in catering roles. Depending on the number of hours worked, staff are required to either complete a distance learning pack (for those working under 20 hours), elementary training (for those working between 20 and 30 hours) or intermediate training (working over 30 hours) in a selected training venue. Although there are appropriate training arrangements in place, based on the sample selected we concluded that training is behind schedule and refresher training is to be scheduled. Due to Covid, a delayed training timetable has been developed to address training needs. When there is a lack of training on food safety, staff may not understand their food safety responsibilities, increasing the risk that food safety standards are not maintained.	Senior management to ensure that relevant food safety training is undertaken by all staff and refreshers are provided where necessary.	**High**	**Response:** Training was reintroduced in March 2022, the focus of which was on new members of staff with limited training. CFM can confirm all new staff employed during the pandemic were issued with the food hygiene distance learning pack to ensure that they had a basic level of food safety to ensure compliance. Any food activities were supervised by the catering managers at site level; therefore, this reduced the risk of a failure in our systems. A food safety training calendar has been developed and will run for the duration of 2023. CFM are currently finalising a list of all staff members who fall out with the recommended 5-year period. CFM have also scheduled the annual food safety update for all food related management teams. **Officer Responsible for Implementation:** Head of Facilities Management **Timescales for Implementation:** January 2023

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No.	Observation and Risk	Recommendation	Priority	Management Response
Key Control: CFM management have adequate monitoring processes in place to identify non-compliance with food safety procedures.				
2	Quarterly performance reports and an annual report are provided to management. Due to Covid however the last annual report was produced in 2019. It was confirmed that the food safety team are in the process of collating a report for the current year. Area Operations Managers are required to carry out annual audits however we found that this was not being complied with. Within the selected sample of three schools, the first school was last audited in 2019 with an audit scheduled for November 2022. The second school was audited in 2020 and again in 2022. The third school was last audited in 2019, and in this instance the action plan was incomplete with no completion dates for actions and training information was incomplete. With a lack of routine monitoring to assess compliance with procedures/management	Senior management must ensure that routine monitoring processes are in place to identify non-compliance with safety procedures, including: a) An annual report provided for the current year (2022) b) Annual audits carried out by Area Operations Managers, where action points are followed up and training information is completed.	**High**	**Response:** The current audit programme is on track for completion in December 2022 with all units being audited once this year. CFM can confirm all auditors have been formally trained in food safety audit procedures, this training is reviewed/updated where identified. The scheduled sessions for January 2023 will re-confirm the prescribed process for the completion of action plans. Additionally, the session will address the necessity of complete and accurate training information. **Officer Responsible for Implementation:** Head of Facilities Management **Timescales for Implementation:**

No.	Observation and Risk	Recommendation	Priority	Management Response
	standards there is an increased risk of poor food safety.			January 2023

No.	Observation and Risk	Recommendation	Priority	Management Response
Key Control: The allergy requirements of individual children are communicated to schools catering staff.				
3	Within the sample of three schools selected, one primary school kept individual folders where the child's name and allergy information are clearly displayed. However, beyond this there are no visual aids (e.g. photos of students) which could make it difficult for new members of team to identify children with special dietary requirements. Although we were advised that new staff would never go to the serving point until fully trained and made aware of dietary requirements, there is still a risk of serving food containing allergens, due to the young age of the children involved, who may not be fully aware of their dietary requirements.	Senior management should consider the requirement for the use of additional visual aids (e.g. photographs of children with special dietary requirements) to further support catering staff in primary schools. If this is necessary, then the food safety advisor should ensure that this is complied with where relevant.	**Medium**	**Response:** Due to GDPR requirements this arrangement varies across all venues as it relies on permission being granted by the pupil's parent/carer to display an image and a suitable area for display. A communication will go out to all relevant schools to request permission for the use of photographs. Evidence will be collated to show acceptance or a decline from parents. **Officer Responsible for Implementation:** Head of Facilities Management **Timescales for Implementation:** January 2023