



Commercially Sensitive

			
Reference:	CUKI/Pest Escalation/2019 V.1 (England)		
Issue date:	2 August 2019		
Review date:	2 August 2021		
Business:	Compass Group UK & Ireland Limited ('Compass' hereafter)		
Primary authority:	Luton Borough Council		
Supporting Regulator:	N/A		
Commercially sensitive	Yes		
PRIMARY AUTHORITY ADVICE			
Relevant Legislation:	Regulation (EC) No 852/2004 <ul style="list-style-type: none"> • Article 5 Food Safety and Hygiene (England) Regulations 2013 <ul style="list-style-type: none"> • Offence: Regulation 19 • Defence: Regulation 12 – Due Diligence 		
Geographic Applicability:	This advice applies in England		
Details of request:	1. Has Compass put in place adequate policies and procedures to manage the presence of pests within its catering operation when operating within a client's premises? 2. Can the Primary Authority confirm that Compass has demonstrated 'reasonable precautions' and 'due diligence' where any Compass Group catering unit are able to show that the referred to escalation procedures have been implemented at the local level?		

Document Name	Compass Primary Authority Advice Pest Control	Document No	PA/FS/POL/001/01
Document Owner	Food Safety	Date of Issue	2 August 2019
Classification	Internal Use	Page No	1 of 3

Commercially Sensitive

<p>Advice provided:</p>	<p>1. Primary Authority advice is provided that Compass has in place adequate pest control management procedures that provide evidence of these 'reasonable precautions'. In providing this advice, we have reviewed the following processes and procedures:</p> <ul style="list-style-type: none">• Food Safety Management System (Compass HSE 2018)• Compass policy summary – Pest Escalation Procedure (FS/AA/001 Feb 2019)• Compass Good Hygiene Practice guide No 3: Pests (Oct 2018)• Compass Good Hygiene Practice Guide No 4: Cross Contamination (Oct 2018)• Compass Good Hygiene Practice Guide No 6: Food Storage (Oct 2018)• Compass Good Hygiene Practice Guide No 12: Cleaning (Oct 2018)• Compass daily opening & closing checklist (HSE 7 Day Log Book)• Staff training. <p>2. In assessing whether “due diligence” can be made out, the Primary Authority will look to ensure that there is evidence of:</p> <ul style="list-style-type: none">(a) Relevant ‘HSE 7 Day Log Book’ checks are performed to a satisfactory standard.(b) Up-to-date relevant training for appropriate staff. <p>If Compass Group UK & Ireland Limited are unable to show that the above due diligence checks (points a. and b.) have been effectively implemented, enforcement action will be allowed on the basis of a local failure of due diligence.</p> <p>If the evidence is provided that Compass Group UK & Ireland Limited have implemented the reasonable precautions above and there is evidence of the above due diligence checks, any enforcement action will be blocked.</p> <p>The Primary Authority only has 5 days to assess whether enforcement action should be allowed or blocked. Therefore, any enforcing authority must liaise with us from an early stage to ensure time to request further information or clarification. The enforcement authority should provide sufficient information about the circumstances of the non-compliance to enable us to make an informed judgement as to whether the proposed enforcement action.</p>
--------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Commercially Sensitive

Document references:	See Above
Issued by:	Deborah Edwards – Primary Authority Account Manager

Notes:

1. Once complete, this template should be saved in a format that ensures it cannot be altered, for example a password protected PDF.
2. This document includes best practice advice and a brief summary of the requirements of the [Primary Authority Statutory Guidance](#). It should be read alongside the Primary Authority Statutory Guidance.
3. Primary Authority Advice is assured. This means that when a business is following the advice, their primary authority can direct against any proposed enforcement action which is inconsistent with the advice.