

Is the control critical to the prevention of E. coli O157 contamination

**Yes:**  
Lack of or inadequate handwashing before handling ready-to-eat foods

Deal with any food at risk and remedial cleaning

Is there a responsible person who can implement changes/improvement and give a credible assurance

NO

YES

YES

NO

Consider HEPN where there is no effective management regime

Consider HEPN if FBO is relying on an unamended procedure/unchanged circumstance

Potential to accept and review by spot check if this is related to an amended procedure/circumstance

Points in favour of acceptance

- Failure is contrary to existing FSMS
- FSMS is credible with respect to research

If assurances are accepted, the FBO must be advised of the consequence if another lapse in handwashing is observed

**No:**  
Inadequate handwashing during ready-to-eat food handling

**No:**  
Inadequate handwashing outside clean area

Improvements required in accordance with standard enforcement practice

Note: the options above are examples of approaches you could take