

Evaluation of Food Standards pilot: Lessons learned

3.1 Implementation of the pilot

The implementation of the pilot (see section 2.3.4) highlighted that:

The support provided by FSA throughout the pilot was well received and crucial to the success of the pilot. This level of support was specific to the pilot and may not be provided to the same extent during any national roll-out. However, some of the support provided can indicate areas to consider in the event of roll-out happening (see section 3.2). Support was important to:

- ensure consistent understanding and interpretation of the terms used to define the proposed risk scheme and decision matrix
- quickly resolve any queries or react to any feedback LAs had during the testing of the proposed model
- build confidence across LAs and help embed the pilot and model into the LA's work practices
- create a LA peer to peer network where they were able to share examples of best practice amongst themselves
- while the intelligence element is still under development, LAs mentioned that meetings with FSA intelligence team helped clarify a common understanding of what intelligence is and what type of intelligence should be shared. Through the pilot, LAs learned how to gather and share intelligence, and after the pilot LA officers were more proactive in gathering and sharing intelligence.

The pilot also highlighted some challenges that may be present with other LAs as well. These were:

- LA MIS will need updating to operate the new model
- LAs databases may be out of date
- unequal experience across LAs of using intelligence, and different understandings of what intelligence is
- practical challenges linked to the dynamic, intelligence-led sampling programme. As the programme had not been scheduled earlier in the year, it was difficult to find the resources to carry it out to completion.

3.2 Lessons about the proposed model

The evaluation has also illustrated some lessons about how the proposed model operates (see section 2.3 and 2.6):

- LAs shared learning points about the model within their teams. They also shared them with LAs as part of the regional groups they participate in. To provide further reassurance, some

LAs reported conducting their own in-house consistency exercises with officers and developing their own guidelines.

- LAs differ on their opinion regarding the effectiveness of TRIs. Further work has been carried out on [the use of remote assessments by LAs](#), which can help draft guidance for LAs.
- while progress has been made, the intelligence component of the proposed model continues to develop in respect of building or otherwise consolidating intelligence capacity and capability both in the FSA and within LAs, and developing appropriate and lawful sharing mechanisms between LAs and FSA.
- internally, FSA can do more work regarding how they plan to analyse the data and what feedback they will provide LAs with.

The study team would recommend the following during the national roll-out:

- ensure that LA MIS are compatible with the proposed model
- support LAs to update their food businesses databases so they are ready to switch to the new model. Some LAs noted that this could take a significant amount of resource, as it was difficult to know whether premises that had registered had opened or closed. Trying to map data using hygiene scores was viewed as useful, but not a perfect solution
- facilitate a shared understanding of the terminology used in the proposed risk scheme and decision matrix, together with practical guidance illustrated with examples from the LAs in the pilot. LAs mentioned that some of the descriptions initially used for the proposed risk scheme were not very clear. LAs suggested they could benefit from re-wording or some examples. An improvement in the definitions and descriptors would help with consistency in interpretation between LAs or officers during a national roll-out
- explain how allergens are assessed and integrated in the proposed model more clearly, by improving the descriptors in the risk rating
- FSA could consider monitoring LA performance in relation to interventions, against the risk profile of food businesses in their area. One LA noted that there was a need to understand the context within which each LA operates to accurately assess their performance, against their local food business profile. For example, one LA could complete 100% of their high-risk interventions, whereas another may only complete 20%, but they have tackled and improved the levels of non-compliance
- ensure the risk scheme recognises Geographical Indications/locally made food as an enforcement priority for some LAs. For example, some areas have premium products attached to their location, which could increase the likelihood of food fraud related to specific products in their area
- consider that some areas have fewer high-risk premises, which can affect the risk profile of FBOs and affect the types of interventions that are performed. A LA that had many small businesses in their area reported having less confidence in the efficacy of TRIs compared to LAs that have a wider mix of premises
- engage LAs that participated in the pilot to share their experiences and lessons learned with other LAs. They all mentioned they would be happy to share their experiences with other LAs. Discussion groups, regional groups and the facilitation of an online discussion thread could be considered as useful channels to help LAs share learning and to embed the proposed model nationally.