

## Summary of stakeholder responses: Consultation on developing a modernised food hygiene delivery model in England

This consultation, which was published on 3 April 2023 and closed on 30 June 2023, sought stakeholder views on modernising the Food Hygiene Delivery Model.

#### Introduction

The Food Standards Agency (FSA) is grateful to stakeholders who responded to this consultation on the following proposed developments to the food hygiene delivery model:

- a modernised food hygiene intervention rating scheme, including a decision matrix to determine the appropriate frequency of these controls based on the risk posed by a food business establishment
- an updated risk-based approach to the timescales (where not prescribed in legislation) for initial official controls of new food establishments, and undertaking due official controls
- increased flexibility as to the methods and techniques of official controls that can be used to risk rate an establishment, including the use of remote official controls
- extending the activities that officers, such as Regulatory Support Officers, who do not hold a 'suitable qualification' for food hygiene can, if competent, undertake

The proposed developments were also consulted on in Wales and Northern Ireland:

- consultation on developing a modernised food hygiene delivery model in Wales
- consultation on developing a modernised food hygiene delivery model in Northern Ireland

The purpose of the consultation was to understand how the proposed developments would affect key stakeholders and gather feedback, suggestions, and potential alternative approaches from interested parties before progressing further with this project.

We contacted a range of relevant stakeholders to make them aware of the consultation and provided them with an opportunity to submit their comments. These included local authorities, professional bodies (footnote 1), education providers and local authority management information system (MIS) suppliers. Alongside the consultation, we also held a series of local authority engagement events.

A full list of respondents can be found at Annex A.

### Summary of comments received

The comments below details the responses received to the questions contained in the consultation package and the feedback from the local authority engagement events.

Careful consideration has been given to the comments provided and the views expressed. Our responses to the feedback received are included following the stakeholder comments.

A summary of proposed changes to the original proposed developments resulting from stakeholder feedback is set out in the Conclusion and next steps section.

Note: A summary of comments is also available for Wales and Northern Ireland.

## Proposed development 1: Modernised intervention rating scheme

#### Question 1

What are your views on the proposed development for a modernised food hygiene intervention rating scheme, including the frequencies for official controls?

#### What did stakeholders say?

Varied feedback received. Some stakeholders, including from local authorities (LAs), industry and a professional body broadly agreed with the proposal, while others from LAs and industry disagreed, commenting it was over-complicated and could be confused with Food Hygiene Rating Scheme (FHRS) ratings.

Mixed feedback on proposed frequencies. Some stakeholders, including from LAs and industry agreed with them. However, others, including from LAs, industry and a professional body commented that the extended frequencies for compliant lower risk businesses were too long, and could lead to a decline in standards as well as reduce consumer confidence in FHRS. Additionally, it was commented that the intensive frequencies for high risk and non-compliant establishments were too short, and did not provide sufficient time to rectify issues or demonstrate sustained improvements, and could also impact FHRS re-ratings.

Mixed views on the 'allergens (cross-contamination)' compliance element. Some stakeholders from LAs, industry and a professional body agreed with it, while others, including from LAs and industry either considered it a Food Standards matter or that it would lead to an increase in non-compliances and required significant training so officers would assess it consistently. It was also highlighted that the same objective could be achieved by clarifying how allergens are considered within the current model. Also varied feedback from LAs and industry on whether this compliance element should be considered as part of FHRS or not.

Varied feedback from LAs, industry and a professional body on Food Safety Culture being considered as part of confidence in management. Some agreed with the approach, while others considered it subjective and difficult to assess consistently.

Respondents generally welcomed the additional score being proposed for confidence in management.

Feedback received from some respondents regarding the vulnerable groups score in the intervention rating scheme highlighted amendments could be made.

#### FSA's response

We acknowledge the feedback received from stakeholders, particularly the elements which were highlighted as key areas of improvement for the existing food hygiene model. We also acknowledge the concerns raised by several stakeholders around the proposed new scoring system and the frequencies of planned official controls.

Having considered the responses received, the proposed intervention scoring and planned official control frequencies (decision matrix approach) will not be progressed.

We will explore the potential development and viability of the other elements of this proposal. Further details can be found in the Conclusion and next steps section.

#### Question 2

What are your views on the identified benefits and impacts for a modernised intervention rating scheme? Are there any further benefits and/or impacts that the proposed development could have? If yes, please outline what these are.

#### What did stakeholders say?

Some respondents agreed with the identified benefits and impacts, while others commented that, due to a lack of resources, LAs are already focusing on the highest risk and non-compliant businesses.

#### **FSA's response**

We note the stakeholder feedback received regarding the identified benefits and impacts of the proposed development.

The proposed intervention scoring and planned official control frequencies (decision matrix approach) will not be progressed.

#### **Question 3**

Do you foresee any challenges if the proposed development for a modernised food hygiene intervention rating scheme were to be implemented? If yes, please outline what these challenges are and what, if any, solutions we should consider?

#### What did stakeholders say?

Respondents highlighted challenges with implementing the proposed development which included:

- Implementation timelines for the modernised model
- Local authority management information system (MIS) alignment costs
- Consistency of risk scoring by local authority officers
- Communication to stakeholders regarding the proposed changes
- Funding to implement the proposed changes
- Producing local authority Food Service plans
- How the proposed developments would align with the Food Standards model

#### FSA's response

We have considered the stakeholder feedback received regarding the potential challenges of the proposed development. As a consequence, we will take forward elements of the proposed development using an amended approach, whilst other elements will not be progressed.

Further details as to the actions being considered for development and/or exploration can be found in the <u>Conclusion and next steps section</u>.

## Proposed development 2: Risk-based approach to initial and due official controls

#### **Question 4**

What are your views on the proposed development for an updated risk-based approach to the timescales for initial and due official controls, including the proposed frequencies?

#### What did stakeholders say?

Varied views received. Some stakeholders, including from LAs and industry agreed with the approach, as the current 28-day requirement is not achievable in all cases. However, other LA stakeholders considered the proposal overcomplicated, highlighting that LAs already prioritise based on risk, so it was of limited benefit.

Some stakeholders, including from LAs and industry agreed with proposed timescales. However, other stakeholders from LAs, industry and professional body thought they were too long, meaning non-compliances wouldn't be identified for extended periods of time, and could impact on businesses who need an FHRS rating to trade. Other LA stakeholders thought the timescales were too short and set LAs up to fail.

Mixed response to proposed triage approach but overall stakeholders were receptive to triaging official controls for new businesses and due official controls. Some LA stakeholders agreed, while other LA stakeholders and a professional body thought it was an additional administrative burden. LA stakeholders generally agreed that, if this proposal is implemented, the FSA's Register a Food Business (RAFB) service should be amended to enable effective triaging by asking food business operators for more information on their activities.

Some respondents, including from industry, also commented that greater use of intelligence should be embedded in the triaging process, including local knowledge, previous food business operator (FBO) history and whether a business is in a primary authority partnership or a member of a third-party assurance scheme.

#### **FSA's response**

While there were some mixed opinions regarding the detail of this proposal, on balance, the ability to triage and prioritise official controls according to risk was welcomed.

Having considered all the feedback received, we intend to progress with elements of this proposed development but with an amended approach.

Further details as to the actions being considered for development and/or exploration can be found in the Conclusion and next steps section.

#### **Question 5**

What are your views on the identified benefits and impacts for an updated risk based approach to the timescales for initial and due official controls? Are there any further benefits and/or impacts that the proposed development could have? If yes, please outline what these are.

#### What did stakeholders say?

Some respondents agreed with the impacts and benefits identified, while others, including those from industry, disagreed, commenting that additional resources would be required to gather data

and effectively triage new businesses. Additionally, it was also commented that the flexibilities to postpone official controls could lead to inconsistencies between LAs.

Some respondents also highlighted that the proposed development may lead to businesses pressuring LAs to undertake initial official controls sooner, further impacting on LA resources.

#### FSA's response

We note the stakeholder feedback received regarding the identified benefits and impacts of the proposed development.

#### **Question 6**

Do you foresee any challenges if the proposed development for an updated risk based approach to the timescales for initial and due official controls were to be implemented? If yes, please outline what these challenges are and what, if any, solutions we should consider?

#### What did stakeholders say?

Respondents highlighted challenges with implementing the proposed development which included:

- Implementation timelines for the modernised model
- Local authority management information system (MIS) alignment costs
- Consistency between local authorities
- Communication to stakeholders regarding the proposed changes
- Limitations of the current food business registration requirements
- Funding to implement the proposed changes
- Producing local authority Food Service plans
- How the proposed developments would align with the Food Standards model

#### **FSA's response**

We have considered the stakeholder feedback received regarding the potential challenges of the proposed development. As a consequence, we will take forward elements of the proposed development using an amended approach, whilst other elements will not be progressed.

Further details as to the actions being considered for development and/or exploration can be found in the Conclusion and next steps section.

# Proposed development 3: Flexibility as to methods and techniques of official controls

#### **Question 7**

What are your views on the proposed development for introducing flexibilities as to the methods and techniques of official controls and the use of remote official controls, including factors to consider?

#### What did stakeholders say?

Varied views received. Some stakeholders including from LAs and industry agreed with proposed flexibilities, as it future proofs the model. However, other stakeholders from LAs, industry and a professional body commented that the flexibilities were complicated, bureaucratic and could lead

to inconsistencies.

Mixed feedback on use of remote methods and techniques. Some stakeholders from LAs and industry agreed with their proposed use. However, other stakeholders from LAs, industry and a professional body considered the use of remote assessment to be limited to certain circumstances, for example re-visits. Other stakeholders from LAs and industry did not support the use of remote methods and techniques at all, commenting only physical official controls could verify compliance sufficiently to award an FHRS rating. Stakeholders highlighted that, if implemented, guidance and training on the use of remote assessments would be required.

Varied comments about the suggested factors to consider when determining which methods and techniques to use. Some respondents agreed with them, while others commented that the factors were complex and the rational for determining the methods and techniques to use were time consuming and bureaucratic. Additionally, some respondents, including from industry, commented that Primary Authority partnerships and membership of a third-party assurance scheme should also be factors to consider. However, other respondents commented that they would question the independence of some third-party assurance data.

#### **FSA's response**

While there were some mixed opinions regarding the detail of this proposal, on balance, the flexibility of methods and techniques of official controls, in suitable circumstances, was welcomed.

Having considered all the feedback received, we intend to progress with elements of this proposed development but with an amended approach to address some of the concerns raised and limitations suggested by stakeholders.

Further details as to the actions being considered for development and/or exploration can be found in the Conclusion and next steps section.

#### **Question 8**

What are your views on the identified benefits and impacts for introducing flexibilities as to the methods and techniques of official controls and the use of remote official controls? Are there any further benefits and/or impacts that the proposed development could have? If yes, please outline what these are.

#### What did stakeholders say?

Some respondents agreed with the identified benefits and impacts, with it being commented that the flexibilities could reduce burdens on businesses. However, some respondents from industry commented that supplying documentation remotely to multiple LAs, when it may already be shared with their Primary Authority could be an additional burden.

Concerns were raised that LAs may use the flexibilities inappropriately, which could negatively impact public health.

In relation to the use of remote methods and techniques, some respondents commented that they do not take less time than those undertaken physically, so would not be a benefit to LAs.

#### **FSA's response**

We note the stakeholder feedback received regarding the identified benefits and impacts of the proposed development.

#### Question 9

Do you foresee any challenges if the proposed development for introducing flexibilities as to the methods and techniques of official controls, including the use of remote official controls were to be implemented? If yes, please outline what these challenges are and what, if any, solutions we should consider?

#### What did stakeholders say?

Respondents highlighted challenges with implementing the proposed development which included:

- Implementation timelines for the modernised model
- Local authority management information system (MIS) alignment costs
- Consistency in use of flexibilities
- Communication to stakeholders regarding the proposed changes
- Producing local authority Food Service plans
- Prior notification of official controls
- Availability/suitability of technology to use the proposed flexibilities
- Use of contractors to undertake official controls
- Food Hygiene Rating Scheme (FHRS)

#### **FSA's response**

We have considered the stakeholder feedback received regarding the potential challenges of the proposed development. We will take these comments into account as the proposal is developed and refined.

## Proposed development 4: Flexibility as to who can undertake official controls

#### **Question 10**

What are your views on the proposed development for introducing flexibilities as to who can undertake official controls and other official activities?

#### What did stakeholders say?

Varied views received. Some stakeholders from LAs and industry agreed with proposal, as it enabled LAs to recruit from a broader group of individuals and grow their own. Some LAs commented that this flexibility should be introduced as soon as possible. However, other stakeholders, including some from LAs, industry and a professional body disagreed, commenting that it devalued the Environmental Health profession and that officers needed a holistic set of competencies to verify compliance and protect public health.

Some stakeholders from LAs and a professional body also commented that LAs may not have officers to authorise, and if they do, they may not have capacity to undertake additional activities without negatively impacting other regulatory areas.

Stakeholders from LAs and a professional body highlighted that LAs may use the proposal as a way to save money and reduce the number of qualified Environmental Health Officers (EHOs) they employ.

LA stakeholders also raised concerns about the availability of relevant training.

Some stakeholders from LAs and industry raised concerns about inconsistencies, particularly as each LA would assess the competency of officers not holding a 'suitable qualification'.

#### **FSA's response**

Flexibility as to who can undertake official controls and other official activities was generally welcomed. However, we acknowledge the challenges and concerns raised by stakeholders.

Having considered all the feedback received, we will refine the proposal to address the challenges and concerns raised.

Further details as to the actions being considered for development and/or exploration can be found in the Conclusion and next steps section.

#### **Question 11**

What are your views on the identified benefits and impacts for introducing flexibilities as to who can undertake official controls and other official activities? Are there any further benefits and/or impacts that the proposed development could have? If yes, please outline what these are.

#### What did stakeholders say?

Some respondents agreed with the identified benefits and impacts, commenting that it would enable officers undertaking qualifications to contribute to the delivery of official controls and gain experience. However, other respondents commented that it could impact LA resources, at least in the short term, as lead officers and other qualified officers would need to train, monitor and assess the competency of the officers not holding a 'suitable qualification'.

Additionally, respondents commented that the proposal could impact FHRS, as business and consumer confidence in the scheme may be reduced if ratings were awarded by officers who, albeit competent, did not hold a 'suitable qualification', and could lead to an increase in FHRS rating appeals.

#### FSA's response

We note the stakeholder feedback received regarding the identified benefits and impacts of the proposed development.

#### **Question 12**

Do you foresee any challenges if the proposed development for introducing flexibilities as to who can undertake official controls and other official activities were to be implemented? If yes, please outline what these challenges are and what, if any, solutions we should consider?

#### What did stakeholders say?

Respondents highlighted challenges with implementing the proposed development which included:

- Implementation timelines for the modernised model
- Lack of local authority resources
- · Competency of officers
- Competency assessment challenges
- Funding to implement the proposed changes
- Local authority management information system (MIS) alignment costs

Communication to stakeholders regarding the proposed changes

#### **FSA's response**

We have considered the stakeholder feedback received regarding the potential challenges of the proposed development. As a consequence, we will take forward elements of the proposed development using an amended approach, whilst other elements will not be progressed.

Further details as to the actions being considered for development and/or exploration can be found in the Conclusion and next steps section.

### **General questions**

#### **Question 13**

If the proposed developments were to be implemented, what guidance and/or examples would be useful to assist with understanding and consistent implementation?

#### What did stakeholders say?

Stakeholders from LAs, industry and a professional body commented that guidance, training and consistency exercises would be required if the modernised food hygiene delivery model (FHDM) was implemented.

#### **FSA's response**

The FSA notes consultation feedback regarding the need for guidance, training and consistency exercises. These will be considered and implemented in combination with the elements of the proposals which are to be progressed.

#### **Question 14**

Are there alternative approaches that could be considered for a modernised FHDM? If yes, please outline what these are.

#### What did stakeholders say?

Stakeholders, including from LAs, industry and a professional body suggested alternative approaches including:

- Introducing an enhanced food business registration / licensing approach
- Charge for official controls or a 'fee for fault' approach
- Make minor amendments to current model to achieve same objectives
- Greater recognition of industry assurance schemes and Primary Authority
- Amending legislation to remove low risk businesses from scope of official control programme
- Modernisation of LA enforcement powers, including fixed penalty notices.
- LA resources / increasing the number of Environmental Health Officers in the profession

#### FSA's response

The FSA notes the consultation feedback regarding alternative approaches to modernising the food hygiene delivery model.

The broader FSA Achieving Business Compliance (ABC) Programme is looking at modernisation of the food regulatory system which may consider longer-term reforms in some of these areas. This would be done in collaboration with stakeholders, through defined forums and existing governance structures.

### **Conclusion and next steps**

We have carefully considered all the consultation responses and feedback provided.

There were mixed views on some elements of our proposals, but there were others which had broad support. More generally, we also heard from many local authorities that they face significant and pressing resourcing challenges. Some of the changes we have proposed could assist them in using their resources in a more effective way.

We therefore intend to progress with substantive elements of the proposed developments, which were supported by the consultation, but in a more efficient and effective way than originally proposed. These elements are set out in the Next steps section below. We will refine and develop these elements taking the consultation feedback into account and will further consult with stakeholders in due course.

Elements of the proposed developments which would require piloting, or significant management information system (MIS) changes, will not be progressed. This includes the proposed food hygiene intervention scoring and planned official control frequencies (decision matrix approach). Given the responses to the consultation, the costs and timescales required outweigh the potential benefits.

The next milestone of this project was to pilot the proposed developments. In light of the consultation feedback, and our subsequent revised approach, the planned pilot will not be going ahead.

Feedback from the consultation also highlighted alternative approaches to enhance the existing food hygiene delivery model. The broader Achieving Business Compliance (ABC) Programme is looking at modernisation of the food regulatory system which may consider longer-term reforms in some of these areas. This would be done in collaboration with stakeholders.

#### **Next steps**

The proposed amended approach for each proposal has been outlined below:

**Proposed development 1** – A modernised food hygiene intervention rating scheme including a decision matrix to determine the appropriate frequency of these controls based on the risk posed by a food business establishment.

**Proposed action** - There was a mixed response to proposed development 1. A number of concerns were raised regarding the proposed food hygiene intervention scoring and planned official control frequencies (decision matrix approach). Therefore, we have decided not to progress development of these elements of this proposal. However, we will explore further the potential development and viability of the following amendments, including the provision of clarification and guidance on:

- the scoring of the provision of food to vulnerable risk groups under the current intervention rating scheme
- a score of 15 for confidence in management
- assessment of allergens by LAs during inspections
- the assessment of Food Safety Culture (where appropriate)

We will consider what changes are needed to the Food Law Code of Practice (Code) and Food Law Practice Guidance (Practice Guidance) to achieve these amendments. If MIS changes are required that are not covered under current MIS contracts, we will assess the costs of introducing these amendments and consider the approach ahead of any consultation on potential Code amendments.

**Proposed development 2** – An updated risk-based approach to the timescales (where not prescribed in legislation) for initial official controls of new food establishments, and undertaking due official controls.

**Proposed action** - There were mixed opinions on the detail of this proposal. However, there was broad support for the triaging and prioritisation of new food businesses and due official controls.

We will consider what changes are needed to the Code and Practice Guidance to achieve this. Feedback from the consultation will be considered when developing and refining this proposal. If MIS changes are required that are not covered under current MIS contracts, we will assess the costs of introducing this proposal and consider the approach ahead of any consultation on potential Code amendments.

Feedback from the consultation indicated the need to develop the FSA's online Register a Food Business (RAFB) system to support the collection of more data to assist local authorities with triaging newly registered businesses. Following the review of the Code and Practice Guidance consideration will be given to any future development to support the changes to the Code.

**Proposed development 3** – Increased flexibility as to the methods and techniques of official controls that can be used to risk rate an establishment, including the appropriate use of remote official controls.

**Proposed action** - There was a mixed response regarding increased flexibility as to the methods and techniques of official controls. On balance, the introduction of these flexibilities was welcomed, including the use of remote assessment in suitable circumstances. Further work will be undertaken to develop and refine this proposal to address some of the concerns raised and limitations suggested by stakeholders.

We will consider what changes are needed to the Code and Practice Guidance to introduce appropriate flexibilities ahead of any consultation on potential Code amendments.

**Proposed development 4** – Extending the activities that officers, such as Regulatory Support Officers (RSOs), who do not hold a 'suitable qualification' for food hygiene can, if competent, undertake.

**Proposed action** - There was a mixed response to extending the activities of officers who do not hold a 'suitable qualification'. However, on balance, we have decided to further explore expanding the activities such officers can undertake, which would have significant benefits for some local authorities. Further consideration will be given to the extent and any additional limitations, controls and training required in order to mitigate the concerns raised as the proposal is considered further.

A review of the Code, Practice Guidance and Competency Framework will be undertaken ahead of any consultation on potential Code amendments.

### **Annex A - List of respondents**

- Arun District Council
- Association of Convenience Stores
- Basildon Borough Council

- Bath and North East Somerset Council
- Borough Council of Kings Lynn and West Norfolk
- Boston Borough Council
- Braintree District Council
- Brighton and Hove City Council
- Bristol City Council
- British Sandwich & Food to Go Association
- Broxtowe Borough Council
- Buckinghamshire Council
- Calderdale Council
- Castle Point Borough Council
- Central Bedfordshire Council
- Central England (North) Food Liaison Group
- Charnwood Borough Council
- Chartered Institute of Environmental Health
- Chartered Trading Standards Institute
- · Chelmsford City Council
- Cheltenham Borough Council
- Cherwell District Council
- Cheshire and Merseyside Food Liaison Group
- Chichester District Council
- City of Bradford
- · City of Lincoln Council
- Consumers
- Cornwall Council
- Costa Limited
- Derbyshire Food Liaison Group
- Dorset Council
- East Cambridgeshire District Council
- East Lindsey District Council
- East Riding of Yorkshire Council
- East Suffolk Council
- Epping Forest District Council
- Essex Food Liaison Group
- Gedling Borough Council
- Greater Manchester Food Liaison Group
- Guildford Borough Council
- Harlow District Council
- Herts, Beds and Milton Keynes Food Liaison Group
- Highfield Group
- Hinckley and Bosworth Borough Council
- Horsham District Council
- Hull City Council
- Institute of Food Science and Technology
- Isle of Wight Council
- Kent and Medway Food Liaison Group
- Kirklees Metropolitan Borough Council
- Lancaster City Council
- Leicester City Council
- Leicestershire Food Liaison Group
- Lincolnshire Food Group
- London Borough of Croydon
- London Borough of Hammersmith and Fulham
- London Borough of Islington
- London Food Coordinating Group

- Manchester City Council
- Marston's PLC
- Mid Kent Services
- Mid Sussex District Council
- Middlesborough Council
- Milton Keynes City Council
- National Agriculture Panel
- Nationwide Caterers Association
- North East Food Liaison Group
- North Kesteven District Council
- North Northamptonshire Council
- North Yorkshire Council
- Oxford City Council
- Plymouth City Council
- Publica Group Ltd
- · Reading Borough Council
- Reigate and Banstead Borough Council
- Rother District Council and Wealden District Council
- Safe to Trade
- Slough Borough Council
- South Cambridgeshire District Council
- South Holland District Council
- South Oxfordshire and Vale of White Horse District Council
- South Yorkshire Food Liaison Group
- Southend-on-Sea City Council
- Suffolk Food Liaison Group
- Surrey Food Liaison Group
- Sussex Food Liaison Group
- Swindon Borough Council
- Telford and Wrekin Council
- Tendring District Council
- Test Valley Borough Council
- UK Hospitality
- Westminster City Council
- Wiltshire Council
- Worcestershire Regulatory Services

In addition to the above respondents, officers from the following LAs attended a face-to-face engagement event, where they provided feedback on the proposed developments:

- Amber Valley Borough Council
- · Ashfield District Council
- · Ashford Borough Council
- Babergh and Mid Suffolk District Councils
- Barnsley Metropolitan Borough Council
- Basildon Borough Council
- Basingstoke and Deane Borough Council
- Bassetlaw District Council
- Bath and North East Somerset Council
- Bedford Borough Council
- Birmingham City Council
- Blaby District Council
- Blackpool Borough Council
- Bolton Council

- Borough Council of Kings Lynn and West Norfolk
- Boston Borough Council
- Bournemouth, Christchurch and Poole Council
- Braintree District Council
- Breckland Council
- Bristol City Council
- Broxtowe Borough Council
- Buckinghamshire Council
- Burnley Borough Council
- Bury Council
- Calderdale Council
- Cambridge City Council
- Canterbury City Council
- Castle Point Borough Council
- Central Bedfordshire Council
- Charnwood Borough Council
- Chelmsford City Council
- Cheshire East Council
- Cheshire West and Chester Council
- City of Doncaster Council
- City of Lincoln Council
- City of London Corporation
- City of York Council
- Cornwall Council
- · Council of the Isles of Scilly
- · Coventry City Council
- · Crawley Borough Council
- Dacorum Borough Council
- Darlington Borough Council
- Dartford Borough Council
- Derby City Council
- Derbyshire Dales District Council
- Dorset Council
- Dover District Council
- Dudley Borough Council
- Durham County Council
- East Cambridgeshire District Council
- East Lindsey District Council
- East Riding of Yorkshire Council
- East Staffordshire Borough Council
- East Suffolk Council
- Eastleigh Borough Council
- Epping Forest District Council
- Exeter City Council
- Fenland District Council
- Fylde Borough Council
- Gateshead Metropolitan Borough Council
- Gedling Borough Council
- Guildford Borough Council
- Halton Borough Council
- · Harborough District Council
- Hart District Council
- Herefordshire Council
- · High Peak Borough Council and Staffordshire Moorlands District Council
- Hinckley & Bosworth Borough Council

- Horsham District Council
- Hull City Council
- Huntingdonshire District Council
- Hyndburn Borough Council
- Ipswich Borough Council
- Isle of Wight Council
- Kirklees Metropolitan Borough Council
- Knowsley Council
- Lancaster City Council
- Leeds City Council
- Leicester City Council
- Lewes District and Eastbourne Borough Council
- Lichfield District Council
- Liverpool City Council
- London Borough of Barking and Dagenham
- London Borough of Barnet
- · London Borough of Camden
- London Borough of Croydon
- · London Borough of Ealing
- London Borough of Hackney
- London Borough of Islington
- London Borough of Redbridge
- · London Borough of Southwark
- Manchester City Council
- Mid Devon District Council
- Mid Kent Services
- Mid Sussex District Council
- Milton Keynes City Council
- National Trading Standards (NTS)
- Association of Chief Trading Standards Officers (ACTSO)
- Newark and Sherwood District Council
- Newcastle City Council
- Newcastle-under-Lyme Borough Council
- North East Lincolnshire Council
- North Hertfordshire District Council
- North Kesteven District Council
- North Lincolnshire Council
- North Norfolk District Council
- North Northamptonshire Council
- North Somerset Council
- North Warwickshire Borough Council
- North West Leicestershire District Council
- North Yorkshire Council
- Norwich City Council
- Nottingham City Council
- · Oadby and Wigston Borough Council
- Oxford City Council
- Pendle Borough Council
- Peterborough City Council and Rutland County Council
- Portsmouth City Council
- · Reading Borough Council
- Redcar and Cleveland Borough Council
- Reigate & Banstead Borough Council
- Ribble Valley Borough Council
- Rochdale Borough Council

- Rother District Council and Wealden District Council
- Rotherham Metropolitan Borough Council
- Royal Borough of Greenwich
- Royal Borough of Kensington and Chelsea
- Rugby Borough Council
- Runnymede Borough Council
- Rushcliffe Borough Council
- Salford City Council
- Sandwell Borough Council
- Sefton Metropolitan Borough Council
- Sheffield City Council
- Slough Borough Council
- Somerset Council
- South Cambridgeshire District Council
- South Derbyshire District Council
- South Gloucestershire Council
- South Hams District Council and West Devon Borough Council
- South Kesteven District Council
- South Oxfordshire and Vale of White Horse District Council
- · Southampton City Council
- Southend-on-Sea City Council
- Spelthorne Borough Council
- St Albans City and District Council
- St Helens Council
- Stevenage Borough Council
- Stockport Council
- Stockton-on-Tees Borough Council
- Stoke-on-Trent City Council
- Stroud District Council
- Surrey Heath Borough Council
- Tamworth Borough Council
- Teignbridge District Council
- Telford & Wrekin Council
- Tendring District Council
- Three Rivers District Council
- Tonbridge and Malling Borough Council
- Torbay Council
- Torridge District Council
- Trafford Council
- Uttlesford District Council
- Wakefield Council
- Warrington Borough Council
- Watford Borough Council
- Waverley Borough Council
- Welwyn Hatfield Borough Council
- West Lancashire Borough Council
- West Northamptonshire Council
- West Suffolk Council
- Westminster City Council
- Wigan Council
- Wiltshire Council
- Wirral Council
- Woking Borough Council
- · Wokingham Borough Council
- Wolverhampton City Council

<ol> <li>The term 'Professional Bodies' refers to professional membership bodies such as the Chartered Institute of Environmental Health and Chartered Trading Standards Institute</li> </ol>