

FSA Review of Delivery of Official Controls (RDOC)

Research with staff delivering official controls



Executive Summary

TNS BMRB was commissioned by the Food Standards Agency (FSA) to conduct research with local authority staff delivering official controls. This summary outlines findings from the research, conducted in 2012-13, exploring their views about the current system of delivering official controls and potential changes in the future.

Official controls are the basic rules of food and feed law laid down in European regulations. As the Central Competent Authority (CCA) for food safety in the UK, the FSA has a legal responsibility for the national arrangements for the execution and enforcement of these laws.

In 2012, The FSA began a review of the delivery of official controls (RDOC) which formed part of a wider portfolio of work undertaken by the FSA to look at how official controls are delivered in the UK. It evaluated the delivery of all food safety and standards official controls undertaken by local authorities and port health authorities (PHAs). This included consideration of how the FSA performs as a CCA in supporting the delivery of official controls. As part of the wider evidence for this review, TNS BMRB conducted research with consumers and local authority staff delivering official controls. This summary focuses on the findings from the research with local authority staff.

A total of 64 local authority staff participated in the online forum across three waves during Oct 2012–April 2013.

How official controls are currently delivered

Local authority staff described wide-ranging approaches to the delivery of official controls. Different ways of working were primarily related to how resources had been (re)allocated in the context of increasing budget pressures facing local authorities. This resulted in different approaches to minimising inputs and maximising the efficiency of work carried out, and working with partner organisations to share work or knowledge.

Variations in delivering official controls were also linked to the different contexts in which Environmental Health (EH), Trading Standards (TS) and Port Health (PH) departments operated. A more standardised approach to

delivery and ways of working was identified in Scotland, Wales and Northern Ireland in compared to English authorities, whose experience and perceptions were more variable; particularly, amongst two-tier authorities.

Views and concerns about the current system

Participants' views and concerns about the current system focused on four broad areas: barriers to delivery; protecting the role of food safety within local authorities; monitoring delivery of official controls; and local authority relationships with the FSA.

- ***Barriers to delivering official controls***

Local delivery was seen as key to ensuring effective partnership working with local business, by facilitating rapport and using local knowledge to promote compliance and ensure consistency for local standards of delivery. Recent budget pressures were to some extent undermining local delivery, and participants felt it was important that the FSA plays a role in helping to ensure minimum resource levels and provides subsidised training to maintain existing standards of skills.

Local authority staff felt that a successful delivery system was underpinned by their ability to pursue an 'intelligence-led, risk-based' approach, which was dependent on having a clear system of prioritisation, adequate flexibility and good communication networks. For some, current FSA guidelines and Code of Practice (CoP) were considered too restrictive, which (combined with budget pressures) made it difficult to meet statutory requirements in practice. Local authority staff felt that there was a need for balance between a flexible CoP and one that provide clear, prescriptive actions which could act to protect delivery levels. Opinions diverged as to what the optimum was on this spectrum.

- ***Protecting food safety within local authorities***

Local authorities' ability to continue working effectively was a key concern for participants, due to a perceived fear that their departments were vulnerable to budget cuts because of comparatively low recognition and support within local authorities.

- ***Monitoring delivery of official controls***

The current audit system was broadly perceived to be time consuming and resource intensive, focusing on 'number crunching' inputs rather than meeting compliance levels.

- ***The relationship between local authorities and FSA***

Local authority staff reported positive working relationships with regional FSA teams, who provided advice grounded in an understanding of the constraints local authorities are operating under. However, relationships were viewed as less successful at a central level due to a perceived 'top-down' approach from the FSA, which focused too heavily on adhering to administrative requirements.

Suggestions to improve the delivery of official controls

Local authority staff put forward a number of suggestions for improving the delivery of official controls:

- ***Code of Practice improvements***

Participants suggested improving the clarity and accessibility of the CoP; specifically, by providing practical and realistic guidelines which reflected current priorities and moving to a live, up-to-date, web-based tool.

- ***Support for greater use of intelligence-led, risk-based approaches to delivering official controls***

Staff felt that an intelligence-led, risk-based approach to delivering official controls was the most effective approach in light of budget current pressures. This would be best achieved by local authorities developing individual strategies, underpinned by streamlined local processes and greater gathering and sharing of intelligence by the FSA.

- ***Improving monitoring***

It was suggested that data monitoring by the FSA should be an integrated system that would streamline the process for local authorities to provide information, and also make use of effective feedback mechanisms to share national trends and local information.

- ***Improving local authority relationships with the FSA***

Local authority staff welcomed proactive contact between themselves and the FSA through clearer, better co-ordinated and up-to-date communication. In particular, the use of a secure web portal was

suggested in order to aid discussion with the FSA and disseminate best practice with other local authorities.

- ***Training***

It was felt to be important to retain opportunities for local authority staff to gain access to appropriate and affordable training, and for progress and competency to be monitored by senior staff.

Contents

1. Introduction	6
1.1 Background	6
1.2 Aims of the research	7
1.3 The approach	8
1.4 The report outline	9
2. How official controls are currently delivered	11
2.1 Variations in ways of working	11
2.2 Contextual landscape across key variations:	17
3. Views and concerns about the current system	21
3.1 Delivering Official Controls	21
3.2 Monitoring the delivery of official controls	33
3.3 The relationship between local authorities and FSA	37
3.4 Getting official controls recognised in the local authority context	40
4. Suggestions to improve the delivery of official controls.....	42
4.1 Suggestions to improve the Code of Practice	42
4.2 How to achieve an intelligence-led, risk-based approach.....	44
4.3 How best to monitor official controls	46
4.4 How to improve the relationship with the FSA	48
4.5 Training.....	49
5. Conclusions.....	51
Appendix A - Recruitment.....	53
Appendix B – Topic Guides.....	57

1. Introduction

TNS BMRB was commissioned by the Food Standards Agency (FSA) to conduct research with local authority staff delivering official controls. This report outlines findings from the research, conducted in 2012-13, exploring their views about the current system of delivering official controls and potential changes in the future.

1.1 Background

Official controls are the basic rules of food and feed law laid down in European regulations. As the Central Competent Authority (CCA) for food safety in the UK, the FSA has a legal responsibility for the national arrangements for the execution and enforcement of these laws.

Though certain official controls are delivered directly by the FSA or other Government Departments, the majority are delivered through local authorities and port health authorities (PHAs). Given there are 434 separate local authorities, the current delivery model is complex and potentially inconsistent. In turn, this complexity means it is difficult for the FSA to validate if the delivery of these controls is effective.

The impact of cuts and wider budgetary pressures means local authorities and PHAs are in the process of making decisions about whether to reduce or continue their current functions. In this context, the FSA needed to consider how best to secure efficiency, consistency, resilience and sustainability of the delivery of official controls.

In 2012, The FSA began a review of the delivery of official controls (RDOC) which formed part of a wider portfolio of work undertaken by the FSA to look at how official controls are delivered in the UK. It evaluated the delivery of all food safety and standards official controls undertaken by local authorities and port health authorities (PHAs). This included consideration of how the FSA performs as a CCA in supporting the delivery of official controls. Specifically, the review focused on how effectively the structures in place support official control delivery, including:

- Food hygiene in all UK countries
- Food composition and labelling in all UK countries.
- Food traceability and imports in all UK countries
- Adequacy of laboratory and analytical support for delivering official controls.

The review did not aim to assess individual local authority or PHA performance

As part of the wider evidence for this review, TNS BMRB conducted research with both consumers and local authority staff delivering official controls. This report focuses on the findings from the research with local authority staff (findings from the research with consumers are reported separately).

1.2 Aims of the research

The overarching aim of the research was to explore views and concerns about the current system of official controls and potential changes in the future. This was undertaken across strands – research with consumers, and an online forum with local authority staff delivering official controls. This report focuses on the findings of the research with local authority staff.

Specifically, the research with local authority staff sought to:

- Explore how local authority staff see the role of the FSA and local authorities in delivering official controls, and how the FSA should work with local authorities when issues arise.
- Understand their views and concerns about the current system and priorities for the delivery of official controls.
- Provide practical, current professional knowledge and expertise to inform decision making and assist in developing workable options to improve the delivery of official controls.
- Measure reactions to potential changes to provide an understanding of the practical implications of change, including any barriers to change.
- Explore whether the outputs of the review are seen as a positive direction for official controls delivery.

- Inform discussions at the consumer forum sessions.

In line with changes to the scope of wider review, the objectives were revised during the course of the research which meant that the objective to explore potential changes was revised to explore discussion of key themes emerging from the other strands of evidence from RDOC.¹

The FSA board decided in March 2013 that the circumstances that led to the commissioning of the review had changed. Evidence from the wider review showed that there were no major structural problems with the current model of delivering official controls. This then pointed to the need for the FSA to consider more widely how they can work together with local authorities to deliver improvements. This meant that the focus of the research with local authority staff changed to explore solutions to ways of working between the FSA and local authorities and the role of the future role of the FSA.

1.3 The approach

Research with local authority staff was conducted via an on-line forum, which was open for discussions across three waves. This iterative approach allowed respondents to review other participants' input and take time to consider this and other contextual information provided. Each wave followed a complimentary structure to the consumer research, which enabled findings from each strand to be fed into subsequent discussions.

To ensure initial buy-in from local authority staff, TNS BMRB held two face-to-face launch events (in London and Leeds). This enabled the FSA and TNS BMRB researchers to clarify the aims of the research and ensure local authority staff had an opportunity to discuss their hopes and concerns about the research process, as well as ask questions about the wider RDOC process, in advance of the first wave of online groups.

The online forum was chaired by experienced moderators who facilitated constructive discussion and capture of feedback. Each forum took place

¹ Review of delivery of official controls (RDOC) fourth progress report
<http://www.food.gov.uk/multimedia/pdfs/board/fsa130304.pdf>

over the course of a week with a series of questions asked of respondents on consecutive days. Respondents in turn viewed and responded to what others had posted.

The **first wave** explored views and concerns about the current system of official controls. Respondents discussed the relationship between the FSA and local authorities in delivery, how the FSA should work with local authorities when issues arise and suggested priorities for the delivery of official controls. The **second wave** explored views on the emerging themes from the wider review about the current system and provided suggestions for improvements based on these themes. The **final wave** provided an opportunity to explore local authority staffs' responses to specific solutions, including monitoring, FSA guidance/Code of Practice and the role of the FSA going forward.

A total of 64 local authority staff participated in the online forum. The three waves took place from Oct 2012–April 2013. Participants were selected to reflect the range of authorities across the UK, covering different control areas, including environmental health (EH), trading standards (TH), and port health (PH), as well as a range of staff grades, geographical locations, different authority types (e.g. unitary and two-tier authorities) and authorities operating under specific parameters (adopting innovative approaches, primary authorities, shared services, contracting out services and Local Enterprise Partnerships). A full breakdown of the recruitment approach is provided in the appendix.

1.4 The report outline

Following this introduction, **section two** of this report explores how official controls are currently delivered, as described by local authority staff, including variations of working and the contextual landscape across key variations. **Section three** outlines participants' concerns and views regarding how the system is currently working. **Section four** details participants' suggestions to improve the delivery of official controls. Finally, **section five** provides an overview of the findings and considers what this means for the FSA.

All findings represent the views of the participants who took part in the online forums and do not necessarily reflect the views of the FSA or emulate FSA policy.

All quotations are verbatim, drawn from transcripts of the online discussions. Quotes are attributed to the department (EH, TS, or PH), the region, and local authority structure the participant works in. For example: (EH, England West Midlands, Unitary Authority).

2. How official controls are currently delivered

This section outlines findings about how delivery varied according to differing levels of budgetary pressures, different working relationships and local authority structures.

Part of the rationale behind undertaking the review of the delivery of official controls was that whilst the FSA knew there was variation between the ways in which local authorities delivered official controls, the extent and impact of this variation was unclear. Wave one of the online forum found that the ways in which local authorities vary in delivery was linked to the different contexts in which they operate, including variation nationally, different local authority structures, different local authority priorities and significantly by the level of cost-cutting that EH, TS and PH departments had undergone.

It is important to note that throughout the forums, local authority staff were broadly supportive of and positive about the current system of delivery; with concerns primarily stemming from the impact of financial pressures facing local authorities.

Variations in ways of working

Participants described differences in the approaches local authorities were taking to the delivery of official controls. These variations primarily related to the allocation of resources in a difficult financial climate, with varying consequent practices of minimising inputs and maximising the efficiency of work carried out, and working with partner organisations to share work or knowledge. These are outlined below.

2.1 Resource allocation and the impact of budgetary decisions on delivery

Only a small number of participants felt they were currently able to meet the minimum requirements set out in the code of practice – the majority having to cut back the number of inspections due to lack of resources, and reporting large backlogs of routine inspections and paperwork. It was reported by many that environmental health and trading standards were

rarely regarded as a priority within local authorities, lacking the political clout of children's services for example, and as a result they were not faring well in the context of competing resources.

"I am concerned that with increasing pressures on local authority budgets food services are likely to be squeezed detrimentally. Councillors do not regard food control as being an important issue, however it is an activity that the public would be appalled if it wasn't carried out" (EH, W. Midlands, Unitary Authority²)

Amongst the departments who had experienced staffing cuts or reduced hours, for example, there were various strategies being undertaken in order to allocate limited resources effectively and efficiently. These strategies were labelled 'common sense' approaches that concentrated on outputs and areas of activity deemed to be highest risk, with less attention being paid to inputs and achieving what were viewed on the whole as unrealistic numerical inspection targets. Specifically, the statutory minimum requirements set out by the Code of Practice³ (CoP) include a requirement to conduct full inspections of certain kinds of food businesses at a certain frequency. The prescribed frequency was felt by some to be unnecessarily high; particularly for certain kinds of businesses which they felt did not need to be inspected quite so often. High minimum inspections meant that local authorities could not conduct the required number within resources they possessed. (This is explored in greater detail in section 3: *The extent to which guidance is practically applicable.*)

Various other strategies were being employed in order to streamline delivery and cut costs. A small number of local authority staff were attempting to reduce the impact of local authority funding cuts on their department by using central government grants to fund additional work, although this was not seen as a sustainable or long term strategy.

² For a breakdown of the types of local authorities included in the research, please see the appendix

³ The Food Law Code of Practice sets out instructions and criteria that local and port health authorities (food authorities) should comply with when enforcing food law. Food authorities must follow and implement the provisions of the code that apply to them. See <http://www.food.gov.uk/enforcement/enforcework/foodlawcop/>

Funding levels directly impacted on how local authorities prioritised inspections according to risk classification⁴, with some focusing exclusively on higher risk food businesses (that fall into category A and B), and either contracting out inspections of lower risk businesses, conducting reduced or partial inspections, or not inspecting them at all.

Areas of priority other than visiting food businesses categorised as 'high risk' included closures, infectious disease outbreaks and responses to complaints, as well as health and safety.

In some cases, local authority staff reported cutting back on entire aspects of service, concentrating on food hygiene controls and allowing food standards to 'take a back seat'. Those who had not experienced a high level of budget restrictions were continuing (or at least aiming) to inspect businesses at all risk categories. However, whilst there was variation in ability to meet the minimum inspection requirements as set out by the CoP, in general local authority staff were struggling to do so (particularly amongst lower risk businesses), and consequently felt these minimums were largely unrealistic given current budgetary constraints. Whilst there was initially reluctance amongst officers to deviate from the CoP, those who had experienced success in improved compliance levels had become more confident in this approach.

"We try to be fair, consistent and comply with the CoP but some of CoP is not practicable in today climate." (EH, Yorkshire & Humber, District Council)

"We attempt to carry out interventions as per the frequency within the CoP however we fail to achieve this because of limited resources, and resources required to deal with closures and Infectious disease outbreaks as and when they arise." (EH, England South East, London Borough)

Participants outlined various approaches they had taken to try to maximise efficiency and effectiveness in light of budget pressures. Not all

⁴ Food businesses are categorised according to the potential risk they pose to the consumer. A business will be given a risk rating following an inspection, which will determine its risk classification from A to E, with A being the highest risk (e.g. takeaways) and E the lowest (e.g. off-licenses).

authorities had well-developed efficiency strategies – those who had more recently experienced a change in funding were seeking advice and inspiration from others (on the forum as well as through other professional networks). Others had had a chance to trial alternative and innovative approaches and had submitted plans to the FSA for approval, or were planning to do so. Specific examples of the various approaches that had been taken are outlined below:

- Revising the risk classification – not using the FSA risk rating system which was felt by some to produce risk classifications that are too high, but instead using a ‘risk based model’; for example, making inspection decisions based on a business’ past compliance.
- Concentrating on highest risk business (categories A and B) and undertaking the following approaches:
 - Only inspecting medium or lower risk food businesses in response to intelligence, complaints, outbreaks, or new openings or registrations
 - Contracting out the inspection of lower risk premises (or using a hybrid, flexible approach in which more serious misdemeanours are escalated back in-house to local authority staff)
 - ‘Triaging’ or assessing each category C business to determine which are higher and lower risk within the group based on their history, and inspecting a proportion of them
 - Medium and lower risk businesses receiving a full inspection every other visit and a partial inspection in-between, unless standards fall
 - Officers conducting partial inspections, deciding on arrival at premises whether this is appropriate
 - Using alternative enforcement strategies; for example: questionnaires; self-completion; verification; sector or issue-specific inspections or telephone surveys to free up more time for the inspection of higher risk businesses.
 - Employing sector-specific project work for medium risk businesses e.g. allergen sampling, and using the visit as an opportunity to give general food and trading standards advice
 - Conducting ‘non-official’ monitoring and surveillance visits
 - Conducting lower/lowest risk inspections by telephone

- Using inspection templates that are pre-populated with the premises history, meaning that officers conducting inspections spend less time filling in forms and more time on the inspection itself.

These approaches have had mixed results for different authorities – some had been abandoned as an ineffective method, whilst others had found them a necessary tool.

In addition to maximising efficiency, participants described a variety of approaches they had adopted to attempt to improve the effectiveness of delivery. A focus on education rather than enforcement emerged as a prevalent theme, with many favouring an informal or 'lighter-touch' approach, with enforcement being carried out only when necessary. This mirrored a more general shift away from 'number-crunching' or 'churning' out visits, towards spending more time educating and supporting businesses to ensure they understand what is being asked of them.

In the absence of any set guidelines on how best to educate businesses effectively, beyond offering them support and advice when visiting the premises, different authorities had adopted a variety of approaches. This ranged from the more intensive (running seminars and training for food businesses) where additional FSA funding had been secured, to lower-impact activities requiring less resource, for example: inviting food business owners to meetings at council offices if they did not reach broad compliance over a certain number of inspections; or holding ceremonies for high achievers under the rating scheme or championing 'earned recognition' to encourage other businesses in the area.

"Now we interact with the customer differently and more extensively there is a better opportunity to build up a relationship with the FBO and thereby produced enhanced compliance and reduced risk. Less time is spent undertaking administrative duties with this time being reinvested with businesses....By reviewing how we run our service we have been able to strip back what we do that actually adds value to achieving our purpose and remove any waste activities that don't." (EH, West Midlands, Unitary Authority)

2.2 Working with others

Local authority staff also described slightly different ways of working with others, whether within their own local authority, with others from neighbouring authorities, or with third parties.

Good working relationships were reported with other agencies and bodies through regional partnerships and forums; for example, public health groups and liaison groups. Local authority staff described a range of organisations they had developed relationships with and a wide variety of working practices. A number of specific examples are outlined below:

- Participants spoke of the importance of working closely with Environmental Health, Trading Standards, licensing colleagues and pest control, as well as other local authority departments to act as their 'eyes and ears' to alert one another of potential issues. Departments may also be sharing inspections, resulting in streamlining and minimising visits to food businesses
- Trading Standards officers working with County Scientific Services to help conduct inspections, who will then refer back to Trading Standards if there is a non-compliance issue
- Teams working closely with the police on food fraud matters
- Teams working with DEFRA
- Working with public health teams (for example, on nutritional information, obesity and labelling), and others planning to do so in the near future
- Working with Economic Development, by utilising their existing links to businesses to get key food standards and safety messages across
- Sampling programmes were aligned with local and national associations
- Participants spoke of good working relationships with food liaison groups and regional panels, and many with other local authorities
- Participants reported a good relationship with the FSA in general, though felt that currently communication was generally in the form of updates from the FSA, and that communication could be more two-way
- Staff were on occasion using marketing activities to promote food standards and safety and training opportunities for food businesses
- Varied utilisation of quality management systems and auditing processes, for example the extent of the use inter-authority audits, which processes are selected for audits and how frequently councils will be audited

There was variation in the extent of joined up working within and between local authorities. Many participants argued that delivering controls within a local authority context (rather than regional/centralised) allows for a holistic approach, including shared working between departments (for example, licensing, pest control) during inspections and visits. This was seen to maximise efficiency by reducing the number of visits by local authority staff at a time of limited resources, simultaneously reducing the time burden placed on food businesses.

As well as being able to provide intelligence for (or receive intelligence from) other departments, a joined up approach meant that officers' time could be diverted for emergency responses (for example, officers assisting animal welfare officers during the foot and mouth outbreak). Some local authorities reported undertaking work on a collaborative basis with another authority, providing temporary officers to aid their work when there has been a resource shortage and vice versa.

Whilst some reported good working relationships between local authorities, this was not the picture across the board, with some feeling they could benefit from better communication and knowledge sharing with neighbouring authorities. This is explored further in the next section.

"The delivery system is somewhat compartmentalised by means of the various professionals and organisations that are charged with delivering the controls. For example whilst London Boroughs all rub along in say, sector food groups, there is little exchange across the GLA and Shire County boundary. All the outer London borough have boundaries with very many districts, but we never hear from them!"
(EH, East England, District)

2.3 Contextual landscape

Variation in ways of delivering official controls was also linked to the contexts in which EH, TS and PH departments operated in, both by nation and in regards to differing local authority structures in the UK.

Local authority staff were recruited from a range of different operating environments, including area, authority type and structure, and department. Differences in working practices across some of these variables are detailed in this section⁵.

National variation

A broadly standardised approach to delivery was identified in Scotland, Wales and some Northern Ireland unitary authorities, when compared to English authorities, whose experience and perceptions were particularly variable. This was most noticeably the case amongst two-tier authorities in England, as different district councils had variant structures and ways of working. Whilst they echoed many of the views and concerns being raised across all local authorities, of particular significance to them was the ability of local authorities to be responsive to the local area. They also seemed to demonstrate greater concern for the extent to which elected members and senior local authority officials valued food regulatory services.

As some unitary and metropolitan authorities were combining food standards and safety due to budgetary pressures, there was a concern that this could result in food standards 'taking a back-seat' as it was felt that new enforcing officers would be less familiar with this legislation. This was not the case in two-tier authorities, as it was felt there was less risk of food standards being shifted to EH.

Authorities in the devolved nations reported better relationships with the FSA, facilitated by the FSA's close involvement in professional networks and liaison groups, which had on occasion resulted in learning about new funding opportunities or training provision available through the FSA. Staff in the devolved nations also reported closer contact with other local authorities across the nations and consequently greater awareness of

⁵ It is important to note, that due to varying levels of engagement on the forum (i.e. in the varying level of detail provided in posts and whether or not participants would respond to follow up questions posed by moderators), it was not always possible to link to or explain variations by a particular variable (e.g. type of local authority and professional).

differences in delivery and practice, as well as better sharing of good practice. Staff recognised that this was in part due to their smaller size in comparison to England.

In Scotland, local authority staff highlighted their satisfaction in officer's ability to use Remedial Action Notices⁶ (RANs), as they were felt to be an effective enforcement tool, whereas those in England were as yet unable to utilise this method of enforcement (see section 3: *Ensuring effective partnership working with local businesses* for more information about RANs and local authority staffs' views on enforcement measures).

Amongst the Northern Ireland participants, there was a mix of concern and hope expressed regarding the Review of Public Administration⁷ and the implications for official controls delivery. There was also a sense that there was fairly high consistency in ways of working across Northern Ireland.

Type of professional

As noted above, participants were drawn from various local authority departments with responsibility for delivering official controls. These included environmental health (EH), trading standards (TS) and port health (PH) officers, from both the delivery level (enforcement officers) to heads of service. Some local authority staff had more than one of these departments within their remit, for example having responsibility for both trading standards and environmental health.

Staff working in Public Health Authorities (PHA) were generally more positive about the current system of controls than those in Environmental Health (EH) or Trading Standards (TS). They had fairly specific feedback to give about shellfish monitoring and related enforcement actions, current levels of public health protection and laboratory support. There was also stronger support amongst PHAs than EH or TS for the

⁶ A Remedial Action Notice is an enforcement action that can be served to food business operators. It applies only to approved premises and forbids the use of certain processes, premises or equipment, or imposes conditions on how a process is carried out. Unlike a hygiene emergency prohibition notice, it does not need to be confirmed by a court.

⁷ The Review of Public Administration was launched by the Northern Ireland Executive in June 2002 with the remit of reviewing the arrangements for the accountability, development, administration and delivery of public services in Northern Ireland.

importance of strict guidelines, as they felt that the nature of their work meant strict and consistent rules were required to protect food imports into the UK at the point of entry (this is explored in more detail in section 3.1: *Setting Service Expectations with the CoP*). Many from TS expressed a general perception that a coordinated approach to the delivery of official controls was working well.

3. Views and concerns about the current system

This section details the views and concerns raised in the first two waves on the online forums about how local authority staff felt the system was currently working; identifying both areas they felt were working effectively and areas that needed improvement. Whilst the forum in wave one was exploratory in nature, wave two was purposively designed to provoke debate amongst participants (see appendix).

Three main areas emerged from the discussion, which are broken down thematically below. The first area in section 3.1 explores the concerns local authority staff voiced about the actual work of delivering official controls, identifying what they felt to be barriers to effective delivery as well as areas that should be protected. Section 3.2 focuses on the processes of monitoring the delivery, through FSA audits and the collection and submission of national data. Finally section 3.3 examines the opinions of local authority staff about their relationship with the FSA, and how they think they should work together when problems arise.

3.1 Delivering Official Controls⁸

This section explores the principles and practices underpinning the approach to delivery local authorities undertook, focusing on how to ensure effective partnerships with food businesses, the challenges involved in staffing effective enforcement teams, and how best to achieve an intelligence-led, risk-based approach. It then explores attitudes towards the CoP, how achievable it was thought to be, and to what extent stringency is a benefit or a hindrance to delivery. Finally it explores reactions to the implementation of the FHRS/FIHS⁹ scheme.

⁸ Official controls are defined as any form of control for the verification of compliance with food law. These include a range of activities, which are essentially undertaking checks to ensure food, animal feed and animal welfare are meeting legal requirements, through conducting full or partial inspections of food businesses and taking samples of substances.

⁹ The Food Hygiene Rating Scheme (FHRS) for England, Wales and Northern Ireland, and the Food Hygiene Information Scheme (FHIS) for Scotland are FSA / Local Authority partnership initiatives designed to provide consumers with information about hygiene standards in food premises at the time of their most recent inspection.

Ensuring effective partnership working with local businesses

There was a perception that current local delivery was a driver of good relationships with local businesses, as it helped develop rapport and understanding with food businesses to promote and raise compliance through a light touch approach. 'Local' delivery was also deemed appropriate to creating a '*local context to enforcement ensuring a level local trading playing field*' – so that even if there was no consistency in official controls delivery nationally, there was a degree of fairness in having consistent standards within an area. It was felt that local, highly skilled officers with a good understanding of the history of an area and of the food businesses within it helped to build these relationships as well as providing common sense balances to enforcement.¹⁰

"I see a real benefit having officers based within the community that they work, giving them better links to business forums, responding to complaints and reacting to business changes in that area." (EH, East England, District Council)

As mentioned above, it was felt that there is a need for balance between education and enforcement, with the preference being for advice and support to encourage food businesses to work towards compliance improvements, consequently limiting the need for enforcement.

In general participants spoke of taking a graduated approach to enforcement that focused on building and maintaining positive relationships with food businesses to facilitate tailored training, shared learning, or other verbal and practical support. It was raised that this approach was not necessarily being actively encouraged by the FSA - as education and advice do not formally constitute official controls there is no way to measure or report it, and not enough low cost training available for businesses offered. Training opportunities were felt to be particularly important when the operators involved did not speak English as a first language.

¹⁰ The focus amongst local authority professionals on the importance of local delivery was, particularly in wave 1, set against the context of the FSA review and thus can be seen at least in part as a reaction against the idea of centralising services, and as protectiveness for retaining local autonomy.

"The official controls don't include training, education and advice, we have found that these add value to enabling food businesses to understand and apply food safety controls and we have no way of demonstrating to the FSA how this positive resource has been utilised."
(EH, England West Midlands, Unitary)

Local authority staff agreed that they would use enforcement measures when necessary, as a final resort for consistently non-compliant businesses, or when there was an immediate health risk to the public, meaning intervention and enforcement activities would be focused on the most serious cases. Staff also raised the concern that they did not feel they currently possessed adequate tools for enforcement, namely the ability to give businesses a '*short, sharp shock*' rather than trail through drawn out enforcement processes (i.e. taking a business operator to court). An example given was that of the Remedial Action Notice (RAN), with which officers could quickly prohibit the continuation of any process in an establishment (available only in Scotland). Local authority staff called for their extension as they were felt to be an effective tool which non-compliant businesses were responsive to. PHAs called for greater practical ability to take enforcement action on shellfish controls, as they felt that despite a lot of monitoring activity they were currently very limited in their ability to take effective enforcement action.

"I think the enforcement tools that food officers currently have are overly wieldy to deal with poor performers...I feel the introduction of RANs for all food businesses and the use of fixed penalty notices might be more successful. The FSA should trust food inspectors to use these appropriately and proportionately." (EH, England West Midlands, Unitary Authority)

Appropriate staffing

Participants felt that a core aspect of their service that was currently working well was that their team was staffed by skilled, trained and knowledgeable officers. This was particularly necessary as low resources had resulted in deviation from the CoP, requiring officers to improvise and prioritise according to risk. As such, access to low-cost or free training to maintain these standards was regarded as essential. This had become increasingly important in the context of budget cuts as training budgets were reported as one of the first things to be reduced or removed.

"Food inspectors [benefit] greatly from improving training and skills development ... the knock on effect is that their inspections are carried out much more efficiently and [are] targeted because they are able to develop a pragmatic approach to the inspection regime" (EH, England South East, London Borough)

Local authority staff spoke of a skills drain currently affecting the sector, particularly in Scotland and England – where officers were retiring early, and fewer newly qualified officers were entering the profession. There was also a concern that those entering the profession by gaining an MSc qualification rather than being trained in-house did not possess the necessary skills in food safety to ensure high quality.

A related concern was that there was perceived to be, in general, an overemphasis on the requirement for officers to obtain particular qualifications, rather than the 'right' experience. It was felt that real competency could not necessarily be measured by qualifications, and that local management should be able to decide whether an officer had the appropriate skills in order to carry out a particular enforcement, rather than it being centrally prescribed. This sometimes resulted in highly trained officers being used inefficiently; for example, conducting food hygiene inspections of newsagents.

As some local authority staff lacked confidence in the current system for demonstrating competency, there was support for the idea of a national professional development review framework.

The FSA were deemed to have a role to play in dictating the minimum resource required to ensure a safe and functional service. It was felt that if the CoP gave an indication of the necessary staffing levels to achieve statutory requirements, this would help local authority staff not only to plan ahead but also to put together a convincing business case for protecting existing staff or taking on new recruits.

"One of the most important tasks facing local authorities for the next 5-10 years is developing a workforce strategy that identifies the staffing levels and skills required to sustain an effective food enforcement service." (EH, Scotland, Unitary Authority)

Intelligence-led risk-based approach

In the first online forum, participants described a range of ways of working and their ideal approach to delivery. Along with the importance of working well with businesses and retaining trained, professional staff, almost all descriptions pinned success on the ability of teams to pursue an 'intelligence-led, risk-based' approach. This hinged on having a clear system of prioritisation, adequate flexibility, and good communication networks. This concept was built on in wave two to unpick further what it meant and how best to achieve it.

"We are fortunate enough (currently) to have long-standing, experienced EHP's working in geographic areas where they have (in some cases, over a period of time) established a good rapport and working relationship with food business operators... They are also highly aware of food activities within their areas and able to identify unregistered and rogue traders, etc. Such local intelligence is invaluable and must be acted upon, but not in isolation and not at the expense of programmed, risk-based (CoP) interventions" (EH, East England, District Council)

For the majority of local authority staff, an intelligence-led risk-based approach was about finding a balance between prioritising resources to low-performing businesses whilst continuing to monitor standards in other businesses. There was recognition of the potential danger of becoming too complacent about 'broadly compliant' premises as it was felt there would still be potential for standards to slip. The principle behind this idea was about focusing on areas of highest risk to the public, based on the local knowledge of officers who have built up good working relationships with local food businesses, as opposed to completing a fixed number of inspections. It was felt this local knowledge was at risk of being lost as increasingly external consultants were being used, resulting in less effective inspections and outcomes.

Staff wanted greater flexibility in the method of inspection and in enforcement actions so they would be able to comply with the CoP (for example, rather than conducting full inspections with an officer visiting the food business premises, some lower risk businesses could be interviewed over the phone, or several lower risk businesses could be asked to inspect one another).

Staff attested to the importance of being business-need driven, meaning that different businesses cannot necessarily be engaged with in the same way and so require a customised approach. The majority of local authority professionals espoused the view that one size doesn't fit all; meaning official controls may need tailoring in order to be both appropriate and proportionate.

It was mentioned that intelligence-led and risk-based was the approach already utilised by their teams and had been so for years although some noted that it has only recently been expressed as such and achieved 'buzzword' status. These local authority staff expressed concern that potentially using this term could become a gloss for covering cuts in services. However, overall the feeling was that whilst an intelligence-led risk-based approach was already being followed to some extent, greater flexibility was still required in order to achieve more realistic plans for service delivery and to step away from input-driven approaches that were not felt to focus resources most effectively.

Ultimately, when discussing alternate ways of working, local authority staff felt that they would prefer to have FSA approval before changing their approach rather than having to reduce services by necessity and thus become non-compliant.

Several participants stated that successful approaches relied on the creation and maintenance of a network of relationships with other local authorities, working groups and other departments within the local authority – creating 'webs' of connections across local authorities, PHAs and the FSA. There was great variation in levels of inter-working and communication (largely better in NI, Scotland and Wales due to their smaller size). It was felt that a lack of knowledge of and buy-in about the benefits of sharing intelligence has resulted in low commitment to setting up networks.

Whilst a few stated that they currently share information between TS, PH and EH and would like to see this increase, others stated that their offers to share information inter-departmentally are ignored, with other departments and organisations reluctant to share information. Liaison groups were as a positive source of intelligence beyond the local authority boundary that could help gather information and feed back to its members. An example given of effective information sharing was a forum

for members to post results of catering inspections so local authorities could avoid duplication of broadly compliant premises.

The extent to which guidance is practicably applicable

Local authority staff felt that the need for an intelligence-led, risk based approach had become ever more heightened in the context of budget cuts (see section 2.1: *Resource allocation and the impact of budgetary decisions on delivery*), and as statutory requirements became consequently increasingly less achievable. There was a gap reported between what the FSA expects of local authority staff, and what is realistic and practical on the ground. This was not only in relation to budgetary constraints making previous targets increasingly unrealistic, but also stemmed from elements of the CoP and other guidance provided by the FSA being too inflexible or not clear enough.

Participants felt that at times there was a lack of flexibility afforded by the FSA in meeting the CoP. Annex 5¹¹, a section of the CoP that details how food businesses should receive their risk classification and what rules applied to each category of food business, was discussed as an area that was long overdue for revision. Many remarked on the need for amendments to allow for more innovative delivery of food controls – a key example of this lay in the frequency of inspections, where many felt that the number required was too high for specific types of premises; for example, in lower risk establishments where there is unlikely to be high turnover or drastic changes in management processes, or in the requirement to do a full initial inspection of lower risk premises when these were deemed unnecessary.

Other problems lay in the rules around E-rated premises¹² (the lowest risk, including grocers and shops) needing to be updated to reflect new kinds of businesses, and category C being too broad with no way of recognising compliance levels, for example. Further, it was noted that risk categories in the CoP did not correspond to the new FHRS categories (e.g.

¹¹ Annex 5 of the Food Law Code of Practice – “Food establishment intervention rating schemes” sets out food hygiene and food standards intervention ratings, and frequencies for interventions at food establishments

¹² ‘Low risk’ establishments with a risk score of 0-30, or category E, may be subject to Alternative Enforcement Strategies or interventions, and may undergo this every three years (as opposed to at least once every six months for category A establishments).

nursing homes are 5 in FHRS and category B in CoP), which was felt to undermine consistency.

It was also felt that there was a lack of detailed, practical information available on how to implement parts of the CoP as well as other guidance they provided, with E. Coli 0157¹³ being a commonly cited example as not being practical or rational enough to apply in practice, thus requiring the FSA to hold briefing sessions in order to explain it. Whilst the briefing sessions were well received by local authority staff, it was felt that this was not the most efficient approach to disseminating new guidance, and that perhaps food leads and practitioners should have been briefed more fully up-front instead.

In some areas, it was felt that guidance was too vague or theoretical, and did not provide enough practical detail on how issues should be tackled. Some complained of occasional inconsistency or contradictions in communications from the FSA, either between guidance received generally from the FSA and that given through audit reports, or between different sources of advice within the FSA.

"A big issue is the lack of detailed practical guidance from the FSA which all local authorities can use. Why does each authority have to write policies and procedures, when they are all based on the same guidance and there is little variation? Why is there not a standard inspection form? Local authorities that are audited are often criticised I think unfairly on these issues, but the FSA issue no specifications and then criticise local authorities for not meeting the standards they seem to believe are acceptable, but are not prepared to tell local authorities except in audit reports" (EH, England West Midlands, District Council)

There was also a lack of faith in the effectiveness of the CoP. Some felt that its strict guidelines could act as a constraint on improving standards, by causing enforcement officials to focus too narrowly on completing the requisite paperwork and processes. For example, it was felt that the

¹³ The Food Standards Agency issued guidance for food businesses to clarify the steps that they need to take to control the risk of food becoming contaminated by E.coli O157 following outbreaks which were attributed to cross-contamination due to poor handling of food. The guidance can also be used by local authority food safety officers when inspecting businesses

emphasis in Annex 5, part 3 (Confidence in Management¹⁴) on *documented* food safety management systems had led to officers concentrating on a FBO's HACCP¹⁵ documented procedures (i.e. the records businesses keep of how they manage food safety) sometimes at the expense of focusing on addressing food safety risks – that is, officers were too busy ensuring that food businesses were recording their procedures that they did not have time to examine the actual activities themselves. This speaks to a wider issue identified, that in general the administrative and 'form filling' requirements were too burdensome, and hindered their ability to achieve real outcomes.

"The CoP is very prescriptive and may result in limiting officers thought process and ability to contextualise risk...This becomes a tick box exercise where officers struggle to stand back and observe what is actually going on. This in turn could result in missing significant food safety risks that are going on in front of them as the officer is too busy going through paperwork (which may not actually detail what the actual processes are!)" (EH, England West Midlands, Unitary Authority)

"Strict and prescriptive CoPs only work if they are enforceable. The current CoP is not capable of being enforced so it is routinely ignored. This leads to inconsistency and confusion to industry and local authorities" (EH, England North West, Metropolitan Authority)

Setting service expectations with the CoP

There were very mixed views around how to set service expectations amongst local authority staff, which were further developed in the second wave of the online forum. It emerged that a strict CoP was perceived as having both benefits and drawbacks and that there was a need for balance between the two – opinion diverged as to what the optimum was on this spectrum.

¹⁴ Section 3 of the risk classification guidelines details how to score a FBO based on an officer's confidence in their management or control systems, taking into account the attitude of the management staff, their track record and willingness to act on previous advice, and whether their procedures are based on hazard analysis and the control of critical points (HACCP).

¹⁵ HACCP (Hazard Analysis and Critical Control Point) is a system that helps food business operators look at how they handle food and introduces procedures to make sure the food produced is safe to eat.

Prescriptive codes of practice were seen at the very least as something that helped protect budgets within local authorities, where statutory requirements for minimum standards gave managers a baseline to compete against other services. This opinion was widely shared. Others suggested that one use for a strict framework common starting was to improve consistency across teams and local authorities, especially for training new staff. Consistency – facilitated by strict codification – was also something felt to be valued by food businesses. It was felt they would not tolerate having variation in practices across areas, or in some cases may simply move to areas with fewer checks (an issue especially pronounced for PHAs, as importers and other related food businesses can more easily shift their activities to ports where inspections and regulations are more permissive).

"At Ports of Entry consistence of approach has benefits in that it prevents importers from cherry picking points of entry for their products and for importers it creates a level playing field for them they know no matter which port they use the same procedures, documentation etc will be required" (EH and PH, Northern Ireland, Port Health Authority)

Others believed that consistency and complying fully with a prescriptive code was central to maintaining successful system. However, it was raised that there had been cases where follow-up on local authority non-compliance had not been forthcoming, and some felt that unless the FSA properly acts by applying the appropriate sanctions, then a strict rule book will be ineffective.

"The code has helped us protect food services to an extent compared to other EH services as it has become clearer that there are few if any likely consequences to senior managers/members/authorities cutting these services...the rate of erosion has increased. It is this 'bottom-slicing' of the services which the FSA needs to address" (PH, England South West, Port Health Authority)

For some, consistency was about achieving a minimum standard in every system, and it was felt that the CoP had a role in setting out these minimum requirements. However, the potential negative impact of this was that local authorities could decide to work to the minimum statutory level, driving down standards (i.e. if you set a minimum, people will

simply work to that minimum). Further, the idea of a minimum standard was understood to be both input-related (e.g. a minimum number of inspections) and fairly stringent in nature. It was felt by many that the CoP needed to allow for a degree of flexibility so officers could tailor guidelines to local situations, and that over-prescription had the potential to stifle innovation. Flexibility was particularly important to PH officers and PHAs, for whom a 'one-size-fits-all' approach would not match well to the unpredictability of trade patterns, as the types of imported food can be highly variable and can change very quickly and dramatically. Officers thus valued the ability to react quickly to new circumstances, and be flexible in staffing, procedures and skills as necessary.

"Resources should always be risk focused but I think if the FSA make the Code too flexible towards "localism" this will just give local politicians/service directors the opportunity to slash food safety services. Flexibility for local authorities in how they deal with lower risk premises is fine but the approach to higher risk premises should be robust, with sanctions against those local authorities that do not adhere to the COP". (EH, England West Midlands, Unitary Authority)

There was a tension between those who felt that an overly prescriptive CoP undermined their professional judgement as skilled, experienced officers on one hand, and those who valued clear guidelines that remove grey areas and exempt officers and local authorities from having to make decisions for which they may be liable. Where participants came down on either side, this seemed to be linked to their experience, role and skills – specialists felt that stricter codes could lead to a skills drain in the department, turning official controls delivery into a 'tick-box' exercise. Generalists, whose role spanned various aspects of service, were calling for harder lines and a clear steer from the CoP – shying away from making difficult decisions requiring technical expertise. This raised implicit questions about the role of the FSA and where the responsibility should lie for 'expert' decision making – about whether the FSA or local authority staff should be trusted to do so. It was felt that whilst the FSA couldn't be local experts, it was clear that providing this basic guideline document was central to their purpose.

Attitudes were also affected by whether or not the local authority had recently had to make changes around delivery in response to budget cuts and lack of resource – those who had had experience of doing things

differently were more likely to value flexibility and a move towards outcomes rather than minimum inspections. There was general consensus on the need to retain strictness in the CoP to protect public health outcomes and ultimately to protect food services. However at the same time there were calls for increased flexibility amongst those local authorities currently struggling, mainly around relaxing number of inspections of lower risk businesses, and in the ability to use alternative enforcement measures.

The effectiveness of the implementation of FHRS/FHIS

FHRS/FHIS was generally hailed as a positive and successful scheme for incentivising businesses to improve standards and improve compliance rates. Officers felt there were lessons to be learnt from the effective way information about the scheme had been disseminated. It was also felt to have raised the profile of food safety in communities, which was deemed to be important to protecting the continuation of enforcement work (see section 3.4).

Despite being regarded in a positive light on the whole, there were a few concerns raised about FHRS/FHIS: the consistency of the scoring and confidence in the scoring system (reflecting wider uncertainty about current risk classification scheme); that for some it had been resource intensive to update the classifications for FHRS/FIHS, and that the scheme needs to be made mandatory to have maximum impact. There was also concern that the scheme could suffer going forward if resources were subject to cuts, as the ratings would be quickly out of date if inspection numbers could not be maintained.

Many local authority staff attested that only full inspections made them confident in their FHRS risk score rating. As a result, some local authority staff stated that they were beginning to bring new categories of businesses into inspections that were previously only receiving partial inspections or other alternative enforcement strategies, in order that they could include them on the scheme (e.g. bed and breakfasts). This, they stated, was effectively removing the possibility of conducting partial inspections for some food businesses and thus somewhat diminishing their ability to work flexibly. In this regard, the success of the FHRS/FIHS scheme in increasing compliance and raising the profile of food standards amongst consumers had to be balanced for local authority staff against the reduction in flexible enforcement strategies it imposed.

"The FSA should put a strong case forward to make the FHRS display a legal requirement" (EH, England South East, London Borough)

3.2 Monitoring the delivery of official controls

Local authorities are required to collect and record monitoring data on their activities, which is submitted to the FSA via the LAEMS¹⁶ return. The FSA also retains oversight of local authority performance by conducting audits. It was felt that some aspects of the systems for monitoring the delivery of official controls were unrealistic and impractical, given both the time burden they imposed and the limited effectiveness they were deemed to have.

There was also general agreement that monitoring data could be used more productively once collected. Local authority staff felt that through collecting data the FSA has a picture of what is happening across the country and could use this to feed back trends to local authorities. Examples given of feedback that would be beneficial included alerting local authorities to outbreaks, helping them to prepare and respond more effectively, and sharing examples of best practice.

The impact of the audit process

Opinion was divided on how far full FSA audits were an effective system for monitoring the delivery of official controls. The overall sense was that audits were only worth the input required if they were able to genuinely improve ways of working, or were able to convince senior management within local authorities that change was needed (and consequently additional resource required).

It was widely felt that the current audit system was too time-consuming and resource intensive; reducing the amount of time officers can spend on delivery. Some felt that decisions and advice given after the FSA audit process was unhelpful, overly prescriptive and driven by bureaucracy and attention to administrative detail, resulting in the sense that it was neither a productive use of officers' time nor a particularly effective mode of communication between the FSA and local authorities. This issue was

¹⁶ Local Authority Enforcement Monitoring System (LAEMS)

also linked to the problem of administrative burden, as enforcement officers and clerical staff were producing a whole host of paperwork solely for the purpose of FSA audits.

"In this arena, public health is best served by officers who are not time limited on complex inspections and audits." (EH, East England, District Council)

However, local authority staff spoke of how being audited had resulted in more effective and streamlined systems being put into place, and that having an external auditor helps to ensure their Quality Assurance Systems are working effectively. Many spoke of positive experiences of FSA audits, where recommendations brought to light areas that needed development, and particularly where it highlighted to senior management the need for more resource.

As further discussed in wave two, the efficacy of audits was seen to rest on whether or not the recommendations for change were achievable given financial constraints, this ability to raise awareness amongst managers was key. It was the experience of some local authority staff that without sufficient resource their teams have been unable to act on the recommendations made by the FSA during audits, or if they were it was most likely at the expense of other services in the local authority (e.g. social care), which does not necessarily seem sensible particularly if the changes are process-based and not clearly linked to the protection of public health. On the other hand, as mentioned in section 3.1: *Setting Service Expectations*, it was sometimes felt that it was the FSA's reluctance to impose sanctions that resulted in audits 'not having teeth'.

"The auditing team are consistent, fair and helpful, their aim is to assist rather than condemn and they are looking to assist local authority's to meet their legal requirements" (EH, England South East, London Borough)

"Whatever your views are on the FSA's audit programme it can't be denied that it provides and impetus for senior managers within local authorities to focus on their oft forgotten or ignored food/feed service. The detailed paperwork associated with the audit process also provides a very useful lever to support resistance against budgetary savings in the present economic climate...the standing of the FSA's framework"

with the weight of the Board and D of H ministers behind it still provides a valuable weapon in the armoury of the food service manager to maintain the service” (EH, Yorkshire & the Humber, Metropolitan)

LAEMS

Similarly to the audit process, the collection of data required in order to submit the LAEMS return, as well as the attendant administrative burden, was having a somewhat negative impact on official controls delivery. It was felt by several local authority staff that the effect was of a tick-box, ‘number crunching’ exercise, as departments felt pressured to get the sufficient inspection numbers required at the expense of providing support and guidance. Consequently there was a sense amongst some that LAEMS was not the best way of measuring the performance of each local authority, and that the focus should shift from inputs to compliance levels, for instance. Further, some complained of technical difficulties associated with the LAEMS upload, and incompatibility issues meaning staff were effectively doubling their upload as they had to input data into LAEMS and their own internal systems separately.

PH officers mentioned that not all of the work they conducted as part of food hygiene is able to be recorded through LAEMS return, e.g. ship inspections, and so felt it needed to be altered in order to be reflective of the work carried out.

In wave two, local authority staff built on discussion, concluding that the collection and return of LAEMS data had recently improved and become less complex and time-consuming, therefore reducing the burden placed on officers. However, it was still not regarded as particularly useful for local authorities, as they tend to have their own systems for monitoring and don’t have an internal use for LAEMS data. Many pointed out that the information they collect and record for their own internal monitoring could be more useful for the FSA e.g. qualitative case studies, which again could be circulated to other local authorities, rather than purely figures. Further, it was felt that there would be benefit in integrating these systems to prevent the duplication of work, although local authority staff struggled to envisage what this might look like. Further, the wide variation in IT systems used by local authorities was cited as a significant barrier to system integration, and considering the cost implication was not regarded as a priority amongst local authority staff.

A recurring theme around data collection was a desire for greater transparency about how data was being used and why it was being collected. It was felt this would make the data collection more meaningful and less like 'collecting data for data's sake'. Several participants mentioned that on occasions where they had questioned why the FSA required certain data, it was found to be obsolete, resulting in the scrapping of its collection altogether. Whilst it was felt that these activities have likely contributed to the 'lightening' of the LAEMS burden, there is still a sense that the reasons behind collection of some data are somewhat unknown certainly to local authorities but, according to some officers' perception, perhaps also to the FSA.

Local authority staff felt that their confidence in the co-ordination and organisation of the FSA was undermined when they were approached for data they had already submitted through LAEMs return. It was felt that greater transparency about what happens to the data would help re-build this confidence, as well as built trust between local authorities and the FSA.

Finally, participants felt much more could be achieved if local authorities were encouraged to use the national sampling network (FSSNet), and that this data could be better interrogated to inform the establishment of national, regional and local sampling programmes. Participants again mentioned that it had recently improved but was still not user-friendly. They also felt they would benefit from being able to access national data through this network.

The ability of the system to accommodate digital progression

It was widely felt that the administrative burden placed on officers was too great, resulting in long backlogs which hinder inspection and other front line work, and that systems would thus benefit from being able to be accessed from electronic devices.

There were issues reported around the incompatibility of existing paperwork and forms with the use of new digital processes, namely, handheld tablets. Currently the only efficiency-saving method mentioned by officers was the use of a carbon pad during inspections to minimise the need for follow-up paperwork to be sent to the food business. The use of other technology appeared limited and difficult to integrate with existing systems.

"We are currently developing digi pen technology to help with admin. However, our current inspection forms needs to be radically reduced to embrace this technology. Our current form is the result of an FSA audit recommendation that we were previously not recording enough detail! However, the result of the new form is that we have one which inhibits the use of technology and is wasteful" (EH, England West Midlands, District Council)

3.3 The relationship between local authorities and FSA

Local authority staff reported positive working relationships with regional FSA teams, who provided accessible, practical support and advice, grounded in an understanding of the constraints local authorities are operating under. Local authority staff appreciated having a named contact they could approach if they had a query, meaning they had both quick access to and, critically, a timely response from an FSA representative.

Regional teams were also viewed as an effective channel for information dissemination when new guidance was being released from the FSA. Where FSA representatives were attending food liaison groups this was seen as another effective means to keep updated on current FSA thinking.

Relationships with regional FSA staff were perceived as closest and most supportive in the devolved nations – a few problems were reported amongst some authorities in England where FSA teams were felt to be currently overstretched over a region.

The regional teams give the FSA a face and help to keep the link between central and local government. (TS, England North West, County Council)

Relationships were viewed as less successful at a central level, however. Due to the focus on audits and administration, many perceived that the FSA's approach to communication was sometimes overly bureaucratic; a 'top-down' approach that focused too heavily on adhering to administrative requirements. Further, communication was felt to be somewhat unidirectional, as aside from audits many participants had only very limited contact with the FSA that tended to be only when things had gone wrong. Staff preferred two-way, partnership working with a familiar

contact at the FSA and had clear ideas on how to move towards this model (explored in section 4.4).

FSA guidance when problems arise

Developing the views put forward during wave one, the majority of participants were satisfied with their relationship with the FSA but had a few suggestions on how it could improve, particularly when local authority staff encountered issues on which they wanted to seek further guidance. The continuation and improvement of the FSA's support and guidance role to local authority teams was felt to be a high priority.

The provision of centralised advice from the FSA on newly emergent or ambiguous issues was felt to be critical to ensuring consistency across and between local authorities. Several local authority staff cited examples where a lack of decisiveness from the FSA to come down on one side or another had led to different local authorities interpreting the same guidance very differently. Many expressed frustration at receiving 'non-committal' responses from the FSA, or being told to refer to their own legal teams for advice. It was felt that the FSA should not sit on the fence, particularly on controversial issues, and that unambiguous, written advice is required in cases where interpretation may be crucial.

The lack of a strong steer from the FSA on particular issues not only threatened consistency of response but also complicated enforcement. It was felt that this would become increasingly important going forward as many local authority staff were experiencing a shift in responsibilities, as many said they were moving from technical experts to 'business managers', concerned more with controlling budgets than being specialists in food standards. As skills and expertise would then be lost from local authority departments, officers felt they would become increasingly reliant on FSA to provide comprehensive guidance. This issue to some extent reiterates the debate on the desired level of prescription in the CoP, and to what extent local authority staff want to rely on the FSA to be directive decision-makers (see section 3.1).

Whilst there was divergence of opinion as to how far the FSA should go, it was generally felt that if local authorities were seeking advice they would want a decisive response, and that this decision could be communicated to other local authorities; for example, via a website or portal.

It was felt that the FSA had a role in acting as a facilitator for knowledge sharing, for example putting local authority staff in touch with others who had had similar experiences (reported to be highly beneficial for local authorities), thus improving efficiency as solutions would be built on others' knowledge rather than starting from scratch. It was felt that a logging system could help avoid repetition, so if other local authorities had asked the same question in the past the FSA's response could be easily accessed and re-used. Furthermore, it was suggested that the FSA could facilitate discussion between experts and local authority staff when problems arise (e.g. through an online forum or portal) which could result in an "opinion being formed which the rest could follow".

Linked to this, the suggestion was made that the FSA could encourage more self-help through clearly signposting (and potentially hosting) these sorts of discussion forums, providing FAQs and clearly signposting FSA staff specialisms. Several felt that there was a lack of FSA internal integration preventing local authorities from being put in touch with the relevant teams. The FSA as facilitator idea also emerged in relation to sharing best practice and innovation across the UK – it was felt that they are well placed to disseminate this information.

Barriers mentioned by participants to obtaining FSA guidance were the time taken to get to the right person (linked back to having clearly signposted specialist teams) and the delays in getting a response. This was stated as particularly problematic in situations that call for a timely response - local authority staff asserted that it would be preferable in these cases to receive at least some interim 'provisional' guidance which could be revised by the FSA later if necessary.

Some participants voiced their total satisfaction with how the FSA worked currently with them and did not recognise a need for change. In general local authority staff stated that they were strongly in support of the FSA continuing with several of its existing functions, namely free or low cost training (which was felt to be invaluable in promoting consistency), supporting national technical panels and attending food liaison groups.

There were several calls for the "Fighting Fund" to be made available to cover local authority costs in situations other than fraud, and for the FSA to help local authorities to deal with shortfall of resources they may incur during major incidents (e.g. legal battles).

Participants also stressed the importance of collaboration, expressing a desire for the FSA to work with other organisations; for example, the Department for Environment, Food and Rural Affairs (DEFRA) and HM Revenue & Customs (HMRC) in regards to guidance on imports. It was suggested that the FSA could also provide information on and links with other CCA's¹⁷ in the EU.

Collaboration with local authorities was felt to be key (e.g. including officers being involved in producing guidance to ensure practicality and reasonability), as well as two-way communication, so the FSA is aware of what is happening at the front line of enforcement (to some extent it was thought that this is being achieved through audits).

It was strongly felt that grounding guidance and training in practical terms and officers' experience would improve consistent delivery as it would be more applicable in the field. Local authority staff also suggested that the FSA could work in partnership with the Chartered Institute of Environmental Health (CIEH) and universities to help secure low cost training. It was also important to local authority staff that FSA advice aligned with that from other bodies e.g. SFBB and e coli.

A further view was that the FSA's role was also to promote and maintain the visibility and importance of food safety and standards through media and marketing campaigns.

3.4 Getting official controls recognised in the local authority context

One of the most pressing concerns voiced by participants was their ability to continue working effectively given the imbalance between departmental financial constraints and what was currently required of them. This tension underpinned almost all of the issues discussed.

Local authority staff expressed a fear about the vulnerability of their departments to current or forthcoming budget cuts because of comparatively low recognition and support within local authorities. There

¹⁷ Central Competent Authority

was a sense that the food controls is an area which may be less protected during cuts as it is not seen as immediately or obviously politically sensitive, and as such many councillors did not recognise its importance.

Whilst a few local authority staff had successfully secured strong support from their local authorities and amongst councillors, this was not the case for everyone, and the need to do so remained a recurrent theme through all three waves of the forum. It was felt that there was a discrepancy between what level of service was acceptable to elected members and what would be regarded an acceptable standard by the FSA, resulting in many local authority staff feeling like they are currently falling short of the latter.

Mixed views emerged amongst local authority staff about how best to provide safeguards to services, with many feeling this would be best through statutory requirements laid down through the CoP. Others felt that the only way to guarantee the security of services would be to ring-fence budgets, and that this would be particularly true for unitary authorities where as a single authority structure there are more departments competing for attention.

"We are constantly providing evidence to Members to demonstrate value for money but we also have to remind Councillors of the unseen services we provide and our key role in reducing risk in our communities...my concern is that without ring-fenced funding some authorities will always deliver less than required because they fail to commit enough resources into Food Controls" (TS, England North West, County Council)

4. Suggestions to improve the delivery of official controls

In the third wave of online forums, local authority staff were asked to offer their ideas about how to improve the delivery of official controls, giving specific suggestions based on the concerns they'd raised in previous waves.

Suggestions are grouped below under the following themes: how to improve the Code of Practice, be intelligence-led and risk-based, improve monitoring processes; improve the relationship with the FSA and finally how to safeguard training opportunities.

4.1 Suggestions to improve the Code of Practice

Local authority staff had a number of ideas about how to improve both how the CoP is developed and what it should include, as well as ways in which it could be made easier to access and navigate. Suggestions ranged from how to improve the content of the CoP and how it should be written, and how it could be better updated and accessed by practitioners. Specific suggestions from local authority staff are listed below:

Development and content

- The FSA should develop the CoP with the input of local authority officers to make it both practical and realistic in terms of what local authorities can achieve, and reflective of both FSA and local authority priorities;
- Guidelines should be clear and applicable, meaning not too technical or in legal language, and should be unambiguous when it came to controversial or grey areas. This was very important for local authority staff as it was felt that currently the language and terminology was confusing, and the guidance often too abstract or vague;
- There should be a clear distinction in the CoP outlining what the legal requirement is, and what is guidance and best practice in order to meet that requirement;
- The CoP should incorporate innovative approaches that constitute best practice, once they have been tested and evaluated;

- Given the need for ministerial approval to change the CoP, and the blurring of boundaries between CoP, Practice Guidance¹⁸ and FHRS Brand Standard¹⁹, one possible route forward would be to keep the CoP as short and to the point as possible, providing (hyper)links or directions to the other documents which can be updated more easily. Clear signposting to more detailed guidance is key. The different documents should be made more compatible, for example, ensuring the FHRS risk classifications are integrated with the ones in the CoP;
- Ideally, the prescriptive parts of the CoP should detail the levels of staff resource required to meet standards set out, in order to be able to plan for and secure adequate resource. The FSA could consider using data similar to that included in the 2013 “*Protecting Consumers*” report²⁰, prepared for the Accounts Commission by Audit Scotland, which included information on the relationship between number of council staff and risk profile of businesses that would assist local authorities when considering resources and workforce planning;
- PH staff suggested that economic modelling should be included in the revised CoP, in terms of the staff, resource, and budget linked to particular situations or occurrences;
- Annex 5 needs to be updated to make it fit for purpose by reviewing the risk classifications and scoring
 - Specifically part 3 of the food hygiene scoring system (Confidence in Management) would benefit from the introduction of the option of scoring 15 score being introduced (as currently there is not a score in between 20 and 30, which was felt to be too drastic a gap);

¹⁸ The Practice Guidance, associated with the CoP, gives advice to enforcement officers on how best to apply the provisions laid down within the code. It is non-statutory, complements the statutory Code of Practice, and provides general advice on approach to enforcement of the law where its intention might be unclear

¹⁹ The “Brand Standard” is consolidated guidance on the national Food Hygiene Rating Scheme, covering all aspects of implementation and operation of the FHRS. It follows a Q&A format.

²⁰ http://www.audit-scotland.gov.uk/docs/local/2013/nr_130131_protecting_consumers.pdf

How the CoP is accessed

- The CoP should as far as possible be a 'live' document, kept up to date and current, for example, being updated when there is a change of stance on an issue, or when a new programme is being rolled out. It was felt this could best be achieved through electronic 'updates' or 'amendments' circulated around local authority staff, or alternatively through a web-based CoP;
- The CoP could be based online, and if so should possess the following characteristics:
 - A web-based CoP would need to be easily navigable (with appropriate hyperlinks or electronic indexing), as well as accessible from smart phones and tablets;
 - It should include useful links to further guidance, downloadable forms, templates and FSA contacts;
 - Those who have opted in to receive updates could be sent notifications of changes, which could replace the current system of e-mail cascades. However these updates should be kept to a reasonable level and be summarised in the subject line of the message. so officers can easily identify their relevancy.

4.2 How to achieve an intelligence-led, risk-based approach

Participants provided various suggestions about how best to achieve this: by having a strategic, well-developed approach at the outset; by rationalising existing processes and improving the effectiveness of work carried out; and sharing knowledge and information. Specific suggestions that were put forward by participants are listed below:

Working strategically

- A strategic, outcome focused approach to prioritisation according to risk should be taken in order to take into account resourcing challenges. This would involve:
 - allowing greater flexibility for lower risk premises, whilst protecting the time and resource to continue informal visits to these premises to maintain communication and visibility;
 - considering not inspecting some very low risk premises, beyond registration and responding to complaints;

- The FSA should expand its knowledge base on low risk premises in order to have evidence about how best they should be approached;
- The FSA could review and agree to alternative approaches set out by local authorities. Armed with this data they could then disseminate best practice and innovations that have been effective (also keeping a record of those that are ineffective);
- There should be a more co-ordinated approach to providing information and support for, and visiting and inspecting new businesses. This would be important both for managers' ability to predict likely demand in the upcoming year and to demonstrate to local government officials how the food service supports local economic growth (in turn helping to raise its profile);
- There could be dedicated teams of expert EH officers working across the UK that would be contactable for technical advice, as they would be best placed to answer these kinds of queries and would be able to give clear, practical advice. There should be separate specialist teams for different areas.

Streamlining processes

- The way in which inspections are recorded should be streamlined, simplified and digitised where possible, as getting officers to accurately record their findings and follow up on paperwork is one of the biggest barriers to efficiency, particularly where much of the work is repetition;
- It would be useful for local authority staff to be able to access template procedures and policies produced by the FSA, which could be adapted to suit their needs rather than each local authority producing their own templates at great cost. These should all be stored in one library;
- The guidance on how to use the risk classifications and how to score a food business should be made clearer and more consistent.

Improving effectiveness

- A wider enforcement toolkit should be provided for dealing with food businesses who are consistently non-compliant. This would involve extending the use of Remedial Action Notices (RANs), Penalty Charge Notices (PCNs) and Fixed Penalty Notices (FPNs). The FSA

could also explore new tools for enforcement that can be employed quickly and are less resource intensive than prosecution;

- PH staff suggested that more tools for enforcement for shellfish controls should be provided;
- The FHRS/FIHS system should be made mandatory to raise standards amongst the non-compliant. The FSA should make a strong case for this.

Gathering intelligence

- A centralised list should be kept and maintained of all prohibited food businesses and prosecutions, which could be accessed remotely by enforcement staff;
- Local authorities should be granted access to the FSA database on food fraud, and be able to access real time information and data on imported food. This would help identify links between local authorities and facilitate intelligence sharing;
- Representatives from regional groups across the UK could meet to share best practice and ideas.

4.3 How best to monitor official controls

Officers suggested that ideally data monitoring would be an integrated system that could share national trends and local information, with effective feedback mechanisms – local authority staff wanted to shift the balance away from time spent entering the data to time spent using it. The following suggestions were outlined as approaches to best monitor official controls, centring around what kind of data is collected, how it is entered and what is done with it.

Meaningful data

- Data monitoring should move away from being input-focused ‘number crunching’ and rather should be about collecting more meaningful data based on compliance levels. For example, rather than the number of each grade of food business is inspected, the number of those that are consistently A or B or fluttering between grades should be noted. This would demonstrate whether or not local authorities are taking the necessary steps according to the risk classification of the business;
- Comparing local authorities with one another using LAEMS data alone does not take variable factors into account. In order to

remedy this, there should be some way of allowing for the authority's 'measure of capacity' which could link budget, FTE, number and profile of food businesses, rate of 'churn' of new businesses, and the staff profile of those conducting official controls (including whether they are specialists or generalists, number of students, etc). This would enable more effective benchmarking. This data could then be shared on a (secure) system, and would help inform the practicalities of data collection;

- There should be a way to input or share more qualitative feedback rather than purely quantitative data, including case studies and examples that will aid best-practice sharing; for example, describing the circumstances in which an enforcement action was taken;
- There should be greater transparency about why data is being collected and what it will be used for
- **Audits** could be less intensive (especially for smaller local authorities), and less process-focused (linked more to the protection public health). Inter-authority audits can be used as useful alternatives as long as they have the same clout as FSA audits.

Data entry

- The FSA should do more to ensure that those responsible for inputting data into the LAEMS return have been properly trained to ensure accuracy (offering online or road-show training), and could rationalise the guidance for submitting the return;
- LAEMS and local authority systems could be integrated both in terms of data collection and submission, perhaps by creating LAEMS working groups that liaise with software providers to try to simplify integration and reduce the level of manual checking required.

Aggregation and feedback

- The results of LAEMS data collection could be fed back to local authorities with information about how they are performing in comparison to other local authorities; this could be used to promote the service amongst senior local authority managers;
- Data could be made available in a printer-friendly format;
- Internal sharing of LAEMs data should be better integrated so local authorities are not submitting the same data to the FSA multiple times

4.4 How to improve the relationship with the FSA

Participants welcomed the idea of improving proactive contact between local authorities and FSA, and were supportive of the idea of a centralised, secure online portal. The following approaches were suggested to improve relationships with the FSA, both online and offline:

Communications from FSA

- Any new guidance from the FSA should have an introductory summary in simple language (rather than in legal or technical language) so officers can quickly assess whether it is relevant to them. When there is new legislation, FSA could provide Q&A style advice, disseminated quickly;
- Information dissemination to local authorities could be better coordinated, for example, through an annual newsletter which could effectively warn local authority staff about upcoming changes. E-mails could be targeted to the relevant contact with local authority teams, as otherwise they risk being 'diluted' and missed;
- Advice given to local authorities could be dated, easily accessible, with any changes or amendments also updated – essentially keeping an audit trail of queries made to the FSA to prevent duplication of the guidance that is given out and improve consistency of advice. This source of information would need to have a good search function.

Using the web

- The FSA website could be made more easily navigable with a better search function, and could provide real time guidance as well as guidance based on lessons learnt and case studies. This would ensure that advice is up to date, accessible and applicable;
- There should be a secure web portal for local authority staff to use, where not only could officers hold frank discussions and share best practice, but also the FSA could directly lend their interpretation and advice, allowing for a more collaborative way of sharing information and guidance. The forum could also be confidential or anonymous, so officers can ask questions without fear of embarrassment. This could become the central hub to replace a number of existing systems (or could be developed from one of the existing sites). The

FSA monitoring or moderation of this forum would need to be adequately resourced and should not be underestimated;

- It was felt that the format of the discussion forum could be similar to that of the RDOC research forum, which was noted to be an efficient, flexible and convenient method to communicate and share information

Other actions FSA could take

- Improving integration between regional and centralised FSA staff could help the FSA become better informed of what is happening on the ground, for example, through more regional representatives sitting on food liaison groups;
- The FSA could to more to boost the profile of food standards amongst portfolio holders and chief executives: emphasising the work they do for public health; notifying them of emerging issues and what the local authority's role is within that. Raising the profile of EH, TS or PHA alone is not enough, there needs to be a strong business case made for maintaining standards.

4.5 Training

As discussed, a properly trained team was seen as key to the effective delivery of official controls. It was thus viewed as important to retain opportunities for enforcement staff to gain access to appropriate and low cost training, and for progress and competency to be monitored by senior staff – though balanced against time spent conducting the controls as even junior staff time remains a precious resource. Specific suggestions are listed below:

- Training for local authority staff could be more practical and have slightly less of an academic slant;
- More online training (including an online test) should be available, which would provide flexibility geographically and in terms of timings, although this shouldn't replace traditional classroom based training courses (particularly for specialist training);
- The FSA could potentially put together training packs for local authorities to conduct in-house, as well as guidance documents for managers for measuring and monitoring competency amongst their team;
- The FSA should audit local authorities to ensure that performance and development reviews are being carried out, as if formal

assessments were an obligatory requirement they could help secure additional resource;

- Officers could shadow others in different local authorities to aid best practice sharing in a non-political context;
- More training should be made available for food businesses, as there are many who want to be compliant but struggle to understand what is required of them.

5. Conclusions

This section outlines the key findings from the research in terms of how local authority staff currently view the official controls system, what is underpinning their concerns about the current system, and specific suggestions for improvement.

Participants viewed their own role as the deliverer of official controls and the FSA as a decisive expert who needs to provide a strong steer when necessary. However, at the same time they wanted their interaction to be more two-way: less authoritative regulator and more of a 'critical friend' they can approach for help and specialist guidance.

Overall they felt that local authorities were providing a good standard of official controls delivery, but a number of challenges existed. The main challenge in working within the current system was around the level of flexibility afforded to TS, EH and PH teams for decision making and delivery and the monitoring of their work by FSA. In particular, local authority staff called for the need to structure delivery and measure progress by outcomes rather than input. One possible implication of this for the FSA is to review the current guidance, CoP and monitoring procedures to provide greater flexibility, in particular relaxing restrictions around how local authorities approach delivery (for lower-risk) to support innovation and improve effectiveness.

The underlying driver of participants' concerns about the current system was the context of recent and continuing budget cuts in local authorities, exacerbated by the fact that food control teams are rarely viewed as a priority within local authorities compared to other social and public services. A potential implication for the FSA is that local authority staff feel that there is a need for active protection of official controls (either through statutory requirements, profile raising or ring-fencing budgets), and subsequently, the FSA may want to consider reflecting on how best they can support this.

Staff developed specific suggestions for improving the current system which included: supporting a more output-focused approach to delivery and monitoring; reducing administrative and time burden by streamlining procedures and, clarifying the official controls process and improving

channels of communication between the FSA and local authorities. The following key solutions were proposed:

- Relaxing restrictions around how local authorities approach delivery (particularly for lower-risk food businesses)
- Access to CoP and guidance documents could be centralised / web-based and thus better integrated (CoP, Practice Guidance and FHRS Brand Standard)
- The use of a web-based forum/portal to provide support and advice where there are grey/ambiguous areas within the guidance and CoP
- FSA to provide give clear, consistent and responsive guidance and decision making which is recorded/accessible by all local authorities
- Retain training and support functions which are highly valued
- Well coordinated FSA internal communication and information exchange, so information up to date, relevant and only needs to be sent once

A further finding was the high level of engagement and participation with the online forum format. Respondent feedback (received both via the research team and direct to the FSA) suggested that online-based professional discussion and information sharing was valued and regarded as practical and an efficient channel for communication between local authorities and the FSA. The FSA may want to consider implementing future online forums/modes of communication as a way to effectively share information with local authorities.

Appendix A - Recruitment

75 local authority staff agreed to take part in the online forum; of these, a total of 64 participated in at least some of the forum discussions.

Participants were selected to reflect the range of authorities across the UK, covering different control areas (including environmental health, trading standards, and port health), as well as a range of staff grades, geographical locations, different authority types (including those operating under specific parameters e.g. adopting innovative ways of working).

Participation in Wave one was over 85%, with 64 staff engaging in at least half of the online tasks. 89% of staff who took part in wave one returned for wave two (57 staff in total), with 53 staff s engaging in at least half of the online tasks, and 38 staff completing all tasks. In the final wave, 18 participants took part, with 56% completing all four tasks. We suggest that the decrease in participation in wave three was due to an extended delay between the final waves and the FSA board decision to close the final review which may have decreased motivation for involvement.

Reasons for non-participation reported directly back to the research team included, difficulty in logging in on two separate occasions during the five day forum as some respondents had only one opportunity to access the forum. There were also concerns around the time burden of tasks and balancing this with busy workloads. However, there was also demand for greater involvement by some respondents who requested more information and/or enquired whether they could take the questions raised in the forum to colleagues or other LAs.

A full breakdown of the recruitment across the three waves is provided below:

Staff Delivering Official Controls Forum – Wave 1 participation summary

A total of 75 staff were invited to take part in the online forum. Of these, 70 set up their log-in accounts, and 64 participated in two tasks or more. 49 staff completed all four tasks. One participant completed the tasks via e-mail rather than through the platform due to being on leave while the forum was live.

Breakdown of participants:

Area	Total
East England.	8
England E Midlands.	3
England NE.	4
England NW.	5
England SE.	6
England SW.	6
England W Midlands.	7
London.	6
N. Ireland.	5
Scotland.	7
Wales.	4
York & Humber	4
Total	65

Level	Total
Head of Service	12
Principle	30
Delivery	23
Total	65

Other Parameters	Total
Innovative	4
LEP	2
Primary	2
Shared and LEP	1
Shared	5
Total	14

Authority Type	Total
County	6
District	18
London Borough	5
Metropolitan	5
Port Health	9
Unitary	22
Total	65

Job role	Total
EH	45
EH + TS	3
EH + PHA	1
PHA	9
TS	7
Total	65

Staff Delivering Official Controls Forum– Wave 2 participation summary

Participation in Wave 2 was over 76% (compared to 85% Wave 1) with 57 staff engaging with the forum. Of these, 38 participated (66%) in all four tasks and 53 (92%) participated in two or more tasks.

Breakdown of participants:

Area	Total
East England.	8
England E Midlands.	3
England NE.	3
England NW.	6
England SE.	4
England SW.	4
England W Midlands.	6
London.	6
N. Ireland.	4
Scotland.	4
Wales.	4
York & Humber	5
Total	57

Level	Total
Head of Service	11
Principle	19
Delivery	27
Total	57

Other Parameters	Total
Innovative	4
LEP	1
Primary	2
Shared and LEP	1
Shared	4
Total	12

Authority Type	Total
County	6
District	16
London Borough	5
Metropolitan	7
Port Health	7
Unitary	16
Total	57

Job role	Total
EH	38
EH + TS	3
EH + PHA	1
PHA	7
TS	8
Total	57

Staff Delivering Official Controls Forum– Wave 3 participation summary

Participation in Wave 3 was 24% (compared to 76% Wave 1) with 18 staff engaging with the forum. Of these, 10 participated (56%) in all four tasks and 17 (94%) participated in two or more tasks.

Breakdown of participants:

Area	Total
East England.	4
England E Midlands.	2
England NE.	0
England NW.	2
England SE.	1
England SW.	0
England W Midlands.	2
London.	3
N. Ireland.	0
Scotland.	2
Wales.	0
York & Humber	2
Total	18

Job role	Total
EH	13
EH + TS	1
EH + PHA	0
PHA	1
TS	3
Total	18

Other Parameters	Total
Innovative	0
LEP	0
Primary	1
Shared and LEP	0
Shared	3
Total	4

Authority Type	Total
County	3
District	5
London Borough	3
Metropolitan	3
Port Health	0
Unitary	4
Total	18

Level	Total
Head of Service	3
Principle	7
Delivery	8
Total	18

Appendix B – Topic Guides

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Staff Delivering Official Controls Forum RDOC (Wave 1) Topic Guide

Objectives:

The **overall aim** of the research is to:

- Explore how the professionals see the role of the FSA and LAs in delivery of official controls, and how the FSA should work with LAs when issues arise.
- Explore views and concerns about the current system and understand the priorities for the delivery of official controls.
- Explore views on the emerging themes from evidence about the current system.
- Explore reaction to potential changes to provide an understanding of the practical implications of change, including any barriers to change.
- Explore whether the proposals for change are seen as a positive direction for official controls delivery.
- Inform discussions at the consumer forum sessions.

Specifically, the *aim of the first wave of research with professionals is to explore their **views and concerns about the current system** of official controls.*

- Explore views and concerns about the current system.
- Understand how professionals view the relationship between FSA and LAs in the delivery of official controls.
- Consider their views about how the FSA should work with LAs when issues arise.
- Explore priorities for delivering official controls, and principles underpinning these views.

Activities	Moderator Probes
Welcome to the forum	
<p>Welcome and introduction</p> <p>Welcome back, it was great meeting many of you at the launch events and we look forward to hearing more from you. In this section we will outline how the forum will work and briefly reiterate the research process.</p> <p>Firstly we just want to stress what we hope to get out of this research – we are most interested in how things really work practically rather than just how they’re supposed to work – so try to base your answers as much as possible on your personal experiences.</p> <p>You will need to log onto the forum several times this week – it will be live from now until Wednesday 24th October (midnight). We have 4 activities for you to complete – each shouldn’t take more than 15 minutes. How you decide to do them is up to you, you can log in and complete them at any time, do a lot in one go or for 10 minutes a day - although we do ask that you log in more than once (i.e. on different days) so you can respond to any questions we may ask you. However please note that the final activity (<i>My priorities</i>) will not be live until Monday as it will be partly based on some of your previous responses – so please make sure you have checked back and completed this task by the end of the week.</p> <p>Also, in the afternoon of Tuesday 23rd October from 2-4pm members of the FSA team will be online for a live surgery session – answering any questions you might have and responding to some of your ideas. It would be a good idea to try to log on during this session – but if you are unable to you can always log in afterwards to read what’s been said, or leave questions in the surgery section as comments. We strongly encourage you to look at what other participants submit and comment on it – this is a space for constructive debate!</p> <p>Remember this is the first of three waves - the next two</p>	

<p>waves will take place on a week starting on Monday 26th November and Monday 11th February.</p> <p>Please note that you may receive e-mail reminders if you have not completed all tasks, or when someone has commented on one of your replies. Finally, if you have any questions, concerns, or technical difficulties, please contact me via e-mail at emily.fu@tns-bmrb.co.uk</p>	
How we deliver official controls	
<p>Delivering official controls – the current system <i>Currently local authorities (LAs) and Port Health authorities (PHAs) undertake certain tasks under delegated authority of the FSA to ensure that businesses are complying with food law – these include inspections, audits, surveillance, sampling, analysis and enforcement actions. Each LA/PHA may deliver these controls slightly differently</i></p> <p>In this first activity we want to you to provide a snapshot of how the system of delivering official controls currently works from your point of view.</p> <p>First, we'd like you to outline what type of official controls you have responsibility for (whether you carry these out yourself, or oversee others who carry them out)</p> <p>Second, <u>briefly</u> describe how you currently deliver these controls – this could cover:</p> <ul style="list-style-type: none"> • how decisions are made as to the volume and mix of the interventions you deliver • how you set about achieving food business compliance • who you work with to deliver the range of official controls – both individuals or other bodies • how you deliver the work undertaken • what the approach is to enforcement activity 	<p>Make sure people are explaining what they are basing their views on –</p> <ul style="list-style-type: none"> • Knowledge • Assumptions • Experience <p>Where possible ask participants to ground things by <i>giving an example</i> they have personally experienced</p> <p>Decision making: how do they decide what work they do/don't do, and do they agree with this Why do you work this way? Has it always been the case? Why/when did you change? What has the effect been? If struggling – ask them to describe their most recent</p>

<ul style="list-style-type: none"> • how you work with/liaise with other services within your authority or other authorities, bodies/agencies, or the FSA • <i>If your role additionally covers Trading Standards, please also discuss how you deliver these controls specifically (if not already mentioned)</i> <p>If you specialise in a certain area it is fine to focus on the area you are most familiar with but please explain this in your response. If you work across more than one area, describe what they are and roughly estimate the percentage of your time spent dealing with each. <i>Try to highlight any differences to the systems of other authorities that you may be aware of;</i> for example, sharing responsibility with others for delivery, doing something in a different way to other authorities, any recent changes or innovations.</p> <p>Also, please highlight in your response how you and your team make decisions about what you do or don't do in the long term or day to day. Do you agree with the decision making process? Why? Why not?</p> <p>In the next section we will focus on which areas you think are currently working well and which ones might need improvement.</p>	<p>experience of administering OCs, whether this is typical, why they work in this way</p> <p><i>Tag major areas of concern</i></p>
<p>Views of the current system</p>	
<p>In this second activity we want to explore your views of your current system.</p> <p>Thinking about how you currently deliver official controls, we now want to hear which areas you feel are currently working well, or areas that you feel require improvement.</p> <ol style="list-style-type: none"> 1. What do you think is working well currently and why? 2. Are there any areas that concern you, where there could be improvements? 3. How do you think this might change in the future? 	<p>Probe for examples and illustrations based on participants' experiences</p> <p>Why do people think certain things are good/bad – how are they making these judgements</p> <p>Why do you work this way? Has it always</p>

<p>For example, if something is currently working well, do you think this will continue to be the case going forward?</p> <p>If you have any other comments or questions for FSA, don't forget you can direct them to the Surgery Section.</p>	<p>been the case? Why/when did you change? What has the effect been? <i>Tag major areas of concern</i></p>
Problem solving	
<p>Thinking of an example of when you have experienced a barrier to effective official controls delivery, describe what the problem was and how you addressed it, including any involvement with teams/services within your authority or other authorities, the FSA or any other bodies or agencies.</p> <p>This could be anything from a challenging case, an enforcement action or incident, or more general challenges affecting delivery / your team as a whole</p> <ol style="list-style-type: none"> 1. If the solution worked well, what was it that enabled this to happen? 2. If the problem was not dealt with in the way you would have liked – what was it that prevented this? Describe your 'ideal' response <p>Thinking about your relationship with the FSA, we would like to hear about the types of interactions that you may have with them: [Depending on your role, you may have quite limited experience of working directly with them – this is fine, just focus on any contact you might have with them including the materials and communications they use to support or direct the activities of food officers]</p> <p>Thinking of a different example if necessary:</p> <ol style="list-style-type: none"> 3. <i>If you have had any interaction with the FSA (e.g. regional contact, telephone contact direct to policy teams, auditing, decisions around service delivery), describe this and your view of it.</i> 4. What elements worked well, or what could have 	<p>Probe participants to describe the issue in detail</p> <p>How are they judging things going well? What is producing barriers to effective delivery?</p> <p>Q3: ONLY IF DISCUSSED: What are your views on the various tools used e.g. Local Authority Enforcement Monitoring System (LAEMS), Code of Practice, other guidance – how well is it working for your department? Any issues you can identify? <i>Tag major areas of concern</i></p>

<p style="text-align: center;">been improved on?</p> <p>As before, please try to illustrate with personal experience.</p> <p>If you have any other comments or questions for FSA, don't forget you can direct them to the Surgery Section.</p>	
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My priorities (Will be accessible from Monday)	
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<p>Note: this activity is a “Brainstorm” - a group oriented task that generates ideas which can in-turn be voted up or down by participants, allowing the group to prioritise different concerns.</p> <p>We have been listening to some of the areas that you have been discussing throughout this forum as being important to you, and have collated these with the views of consumers. Below is a list of these priorities:</p> <ul style="list-style-type: none"> a) Simplifying processes b) Clear communication c) Training/advice d) Reducing footfall into businesses e) Xyz f) Xyz g) Xyz <p>Which of these are your top priorities for the effective delivery of official controls? Why are these important to you?</p> <p>Please select one of these and explain why you have chosen it. If you feel there are several that are important, please include this in your explanation.</p> <p>Once you have selected you primary concern, you will be able to see what others have 'voted' for – please take this opportunity to discuss whether or not you agree.</p> <p>If you have any other comments or questions for FSA, don't forget you can direct them to the Surgery Section.</p>	<p>Probe on the principles underpinning these views:</p> <ul style="list-style-type: none"> • Consistency • Efficiency • Transparency • Safety • Value for money/cost-saving • Responsibility • Accountability • Impact • Legality • Makes my job easier <p>How strongly do participants feel? Why are they choosing one area over another?</p> <p>Probe on where opinions are clearly diverging and encourage participants to engage with each other's responses.</p>
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Homework task	
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<p>Thank you very much for taking part in the first week of activities. Your views are important to us</p>	
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<p>and will help form the next stage of consumer, business and professional research.</p> <p>Between now and the next stage (starting Monday 26th November) we would like you to discuss some of these issues with your colleagues. This could be anyone involved in the delivery of official controls – at any level.</p> <ul style="list-style-type: none"> • Their views of the current system – positives and negatives • What they think the relationship between LAs and the FSA is currently, and what they would like it to be ideally • What are their top priorities for delivering official controls? 	
<p>FSA ONLINE SURGERY</p>	<p>TUESDAY 2-4PM</p>
<p>This section will go live on Tuesday 23rd October from 2.00-4.00pm where FSA representatives will be online to answer your questions and respond to some of the comments that have been posted to the forum so far. They will be reviewing your responses so far and may ask further questions, so make sure you check back on your activities so far in case someone has commented.</p> <p>If you are available to log on at some point during the surgery, please do so – otherwise feel free to leave comments or questions here before this time to be addressed during the session. Don't forget to check back before the forum closes (on Wednesday) to review any responses.</p>	

Staff Delivering Official Controls Forum
RDOC (Wave 2)
Topic Guide

Objectives:

The **overall aim** of the research is to:

- Explore how the professionals see the role of the FSA and LAs in delivery of official controls, and how the FSA should work with LAs when issues arise.
- Explore views and concerns about the current system and understand the priorities for the delivery of official controls.
- Explore views on the emerging themes from evidence about the current system.
- Explore reaction to potential changes to provide an understanding of the practical implications of change, including any barriers to change.
- Explore whether the proposals for change are seen as a positive direction for official controls delivery.
- Inform discussions at the consumer forum sessions.

Specifically, the **aim of the second wave** of research with professionals is **to explore initial views on the emerging themes from the evidence about the current system and their suggestions for improvements based on the themes.**

- *Explore views on the emerging themes from the evidence about the current system*
- *Explore whether this is their experience/take on the current system*
- *Explore suggestions for improvements based on these themes – how do they appraise and prioritise these themes to decide where improvements should be made.*

Welcome and introduction

Welcome back, and thank you for your participation in Wave 1! We were extremely grateful for the comprehensive responses we received, which have given us fantastic insight into your roles, as well as your views, concerns and priorities about how official controls are currently delivered.

What we'd like to do now is to start a debate about some of the key things you raised, as well as emerging findings from the wider Review of the Delivery of Official Controls (RDOC). So this time, we want you to briefly respond to five specific points, and then see whether you agree or disagree with what others have said. The aim is to discuss and debate potential solutions to some of the issues you raised. (NB The five questions in this wave are intended to spark debate, so do not feel you need to agree with them!)

We hope that you will find this wave not only less time consuming but also interesting and engaging, using this platform to share and bounce off thoughts and views with others from around the country and in different roles.

Remember this is the second of three waves – the final wave will take place on a week starting **Monday 11th February**.

Please note that you may receive e-mail reminders if you have not completed all tasks, or when someone has commented on one of your replies. Finally, if you have any questions, concerns, or technical difficulties, please contact me via e-mail at emily.fu@tns-bmr.co.uk

For this wave, we would like you to focus on your views and opinions, so please feel free to

<p>just tell us what you think and don't feel you need to get the views of everyone in your team first. Last time we asked you to speak to colleagues about some of the areas of discussion that came up - if you heard anything that was particularly interesting or different to what you or others were saying, feel free to (briefly) note it here:</p>	
<p>Setting service expectations</p>	
<p>One area that was discussed in the previous wave was the extent to which standards for delivering official controls should be centrally prescribed (for example, whether service expectations should be expressed by the FSA in more or less rigid terms). In this first activity we would like to explore your views around the following statement:</p> <p><i>Public Safety is best protected by strict and prescriptive codes of practice</i></p> <p>Please discuss and try to address the following:</p> <ul style="list-style-type: none"> • <i>Do you agree or disagree; why?</i> • <i>What do you think about other people's responses?</i> • <i>What should happen going forward?</i> • <i>Is this an area that should be prioritised by the FSA; why/why not?</i> 	<p><i>PROBE</i></p> <ul style="list-style-type: none"> - <i>What is the ideal approach to setting service expectations</i> - <i>How could the current guidelines (COP, framework agreement) be improved; what is the ideal level of detail / rigidity</i> - <i>How do people's views interact with financial constraints; are proposals for change financially realistic in the current climate</i> - <i>Where should the balance lie between clear (locally defensible) guidelines vs. flexibility and local variations (local risks; food industry developments)</i> - <i>How can the FSA help to champion (and protect?) food safety services within local authorities</i> - <i>What about the balance</i>

	<p><i>between local responsiveness and consistency</i></p> <ul style="list-style-type: none"> - <i>What about the need for alignment and communication with other bodies (governance of the system)</i>
Monitoring official controls delivery	
<p>Another area that emerged in the first wave were concerns about the effectiveness and burden associated with central monitoring of official controls delivery (for example, LAEMs, FSA audits). In this second activity we want to explore your views around the following statement:</p> <p><i>Monitoring data could be collected more efficiently and used more productively</i></p> <p>Please discuss and try to address the following:</p> <ul style="list-style-type: none"> • <i>Do you agree or disagree; why?</i> • <i>What do you think about other people’s responses?</i> • <i>What should happen going forward?</i> • <i>Is this an area that should be prioritised by the FSA; why/why not?</i> 	<p><i>PROBE</i></p> <ul style="list-style-type: none"> - <i>What is the ideal approach to monitoring official controls delivery</i> - <i>Could the information be useful for professionals engaged in delivery (i.e. at local level); how</i> - <i>Is there a role for monitoring data to be used to better understand risk (locally, regionally, nationally)</i> - <i>Whether current monitoring processes (LAEMs, audits) can be improved to provide an ideal approach; if so, how; if not, why not</i> - <i>Is there a tension between focusing on inputs (e.g. number of inspections) vs. outcomes and successful delivery; if so, how can this be addressed</i>
FSA guidance when problems arise	
<p>It was suggested in the first wave that FSA advice and guidance when problems arise is an area you would like to see improved. We would like to hear your suggestions, so please complete the following statement:</p>	<p><i>PROBE</i></p> <ul style="list-style-type: none"> - <i>What would this look like</i> - <i>The importance of practical on the ground advice vs. theoretical guidance (e.g.</i>

<p>The best way for FSA to provide guidance and support is ... (fill the blanks)</p> <ul style="list-style-type: none"> • What do you think about other people's responses? • What should happen going forward? • Is this an area that should be prioritised by the FSA; why/why not? 	<p>COP)</p> <ul style="list-style-type: none"> - Do views differ if the problems are at a national level or if they are individual cases at a local level; how - How would proposals for improving FSA guidance and support allow for <ul style="list-style-type: none"> ○ Consistency ○ Responsiveness ○ Flexibility - What about the role of other agencies/bodies or other local/port health authorities - What about the role of training (provided by FSA; locally delivered)
<p>Intelligence-led risk-based approach</p>	
<p>Finally, in the previous wave we heard a lot about the need for an 'intelligence-led risk-based approach' to delivering official controls. Now we would like to explore what this means, how it might work, and whether it would work for everyone. Therefore, please complete the following statement:</p> <p>An intelligence-led risk-based approach to delivering official controls means... (fill the blanks)</p> <ul style="list-style-type: none"> • What do you think about other people's responses? • What should happen going forward? • Is this an area that should be prioritised by the FSA; why/why not? 	<p>PROBE</p> <ul style="list-style-type: none"> - What would this look like; how would it work in practice - Is this approach feasible under the current service expectations (COP/framework agreement) - How do people's views differ - What are the benefits/challenges of this approach - What information would be needed to feed into this approach - What would be the barriers to implementation - What is the role for FSA / other bodies <ul style="list-style-type: none"> ○ in establishing this

	<p><i>approach</i></p> <ul style="list-style-type: none">○ <i>in supporting/monitoring this approach</i> <p>- <i>Whether people agree this would be a good way forward</i></p>
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**Staff Delivering Official Controls Forum
RDOC (Wave 3)
Topic Guide**

Objectives:

The **overall aim** of the research is to:

- Explore how the professionals see the role of the FSA and local authorities in the delivery of official controls, and how the FSA should work with local authorities when issues arise.
- Explore views and concerns about the current system and understand the priorities for the delivery of official controls.
- Explore views on the emerging themes from evidence about the current system.
- Explore reaction to potential changes to provide an understanding of the practical implications of change, including any barriers to change.
- Explore whether the proposals for change are seen as a positive direction for official controls delivery.
- Inform discussions at the consumer forum sessions.

Specifically, the **aim of the third wave** of research with professionals is

- *Explore professionals' responses to specific solutions*
- *Explore further the role of the FSA going forward*
- *Provide professionals information about the next steps of the review*

Activities	Moderator Probes
Welcome to the forum	
<p>Welcome and introduction</p> <p>Welcome back, and thank you for your participation in Waves 1 and 2!</p> <p>You will have received an email from us in February, explaining that the FSA were finalising the evidence and analysis of this review at the start of this year. If you have any questions there will be an opportunity to raise questions in a Q&A session on the 5th April with Louise Knowles and Helen Thirkle (FSA)</p> <p>Our focus now is to look at how the FSA can work with local authorities with increased partnership and collaborative working, and deliver improvements to the current system.</p> <p>We would like to hear your views on some specific improvement proposals which came out of the previous waves and the wider review, across four 'areas', and as part of this look further at the role of the FSA and how you would like to see them working and interacting with local authorities moving forwards.</p> <p>We will be looking at how improvements to the system might be delivered going forwards, so we would encourage you to respond in as practical and 'action' / 'solutions-based' approach as possible. This will inform the next phase of the work, as agreed by the FSA Board in March, which will move from reviewing the system to now working to strengthen official controls delivery. As with Wave 2, we would like the forum to be a platform to share and bounce off thoughts and views with others, and therefore would also encourage you to comment on others' responses and discuss and debate opinions and issues raised.</p> <p>Please note that you may receive e-mail reminders if</p>	

<p>you have not completed all tasks, or when someone has commented on one of your replies. Finally, if you have any questions, concerns, or technical difficulties, please contact me via e-mail at emily.fu@tns-bmrb.co.uk</p>	
Improvement Area 1 : Monitoring of official controls delivery	
<p>In Wave 2, there was general agreement among local authorities that the monitoring data which FSA require could be collected more efficiently and used more productively. We would now like to focus on what improvements you would like to see in these areas and how you think they could be implemented.</p> <p>1. How could the monitoring that the FSA collects be improved?</p> <ul style="list-style-type: none"> - Are there barriers making these improvements; what would help overcome these? - What other improvements can you think of? <p>2. What data/information collected by the FSA would be useful to share with Local Authorities?</p> <ul style="list-style-type: none"> - Are there barriers making these improvements; what would help overcome these? - What other improvements can you think of? 	<p>PROBE:</p> <p><i>(Overall probes)</i></p> <ul style="list-style-type: none"> - How achievable / unachievable are they in practice - What kind of barriers are they e.g. practical systems, resource i.e. people - Overall, which of these improvements would make the biggest impact; how / why <p><i>(Specific probes on each area of improvement)</i></p> <p>1.</p> <ul style="list-style-type: none"> - What other ways could duplication be avoided - What would they want included/excluded in an audit - How might inter-authority audits be improved; what would help the latter have 'clout' within local authority - PROBE (if not discussed) suggestions from W2: <ul style="list-style-type: none"> • Integrating the FSA's monitoring system (e.g. LAEMs) with local authorities' own monitoring systems for data collection and submission

	<ul style="list-style-type: none"> • <i>Enabling local authorities to input and/or share qualitative (as well as quantitative) feedback, so that FSA can disseminate these for best practice</i> • <i>Making audits less intensive and less process focused (linked more to protection of public health)</i> • <i>Having more inter-authority audits, as long as they are taken as seriously as FSA audits within local authorities</i> <p>2.</p> <ul style="list-style-type: none"> - <i>What makes the data 'meaningful' / useful – how would they make use of it</i> - <i>How much of the data they want is new vs. doing something different with existing data</i> - <i>Data at local vs. national level</i> - <i>PROBE (if not discussed) suggestions from W2:</i> <ul style="list-style-type: none"> • <i>being transparent about how the data is used</i> • <i>giving feedback to local authorities, using knowledge collated from across the country about trends, outbreak alerts and share examples of best practice</i> • <i>feeding back LAEMS data and the RDOC online survey results to Local Authorities</i>
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	<p>with information about how they compare to other</p> <ul style="list-style-type: none"> Local Authorities encouraging local authorities to use the national sampling network FSSNet to inform establishment of national regional and local sampling programmes
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Improvement Area 2: Guidance/ Code of Practice

<p>In Wave 2, there was much debate about how prescriptive local authorities wanted and expected the guidance / Code of Practice from FSA to be; opinion on this was divided. Local authorities also called for FSA guidelines to be clear, practical/applicable and realistic, with input from local authorities to ensure that both FSA and local authority priorities were reflected.</p> <p>In this exercise, we would like to learn more about your views and priorities going forwards relating to potential changes to the guidance and Code of Practice:</p> <p><u>Specifically, taking each of these in turn, please answer the following:</u></p> <p>1. What could the FSA do to help you in development of a strategy to manage low risk premises in a time of less resource</p> <ul style="list-style-type: none"> What would it look like (e.g. what <u>needs</u> to be included and covered; why? <p>2. How would you improve the Code of Practice or other guidance that the FSA produces</p> <ul style="list-style-type: none"> What would a refreshed Code of Practice look like – what needs to be included and covered; why? What are your priorities If this was made into a web-based tool, what type of functionality would you want to see – 	<p>PROBE:</p> <ul style="list-style-type: none"> To what extent do you think such a strategy would be necessary, considering what is currently in place To what extent do you think a new Code of Practice would be necessary, considering the current CoP <p>What would improve the guidance suite provided by the FSA?</p> <p>What would your priorities be in terms of the information provided?</p>
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<p><i>what <u>needs</u> to be included/covered and what would you want to be able to do on it; why?Any other views on improvements relating to Guidance / Code of Practice?</i></p> <p>3. Would you see a benefit in having a secure part of the FSA website to aid communication across Local Authorities and with the FSA?</p> <p>- <i>What would you want it to include?</i></p>	
<p>Improvement Area 3: Training/skills</p>	
<p>In the previous waves, keeping up the training and skills of officers delivering official controls was felt to be very important.</p> <p>We now would like to explore your views around key improvement needs in this area. Thinking of your own local authorities (and observations from across local authorities as a whole)</p> <ul style="list-style-type: none"> • <i>What do you think are the key skills / trainings needs in relation to officer competency, and how should they be addressed?</i> • <i>How is office competency currently measured/ verified/ authorised; what's working well/less well?</i> • <i>Any further suggested improvements related to training/skills?</i> • <i>Are there other things that the FSA should do to improve the training provided</i> 	<p><i>PROBE</i></p> <ul style="list-style-type: none"> - <i>Enablers/Barriers to addressing key training and skills needs; what is needed to overcome these</i> - <i>What different ways could skills, training needs be addressed in a time of restricted budgets – what <u>needs</u> to be maintained</i>
<p>Improvement Area 4: Role of the FSA going forwards</p>	
<p>In this exercise, we would like to present some potential ways FSA could improve their role / interactions with local authorities and explore your views on these:</p> <p>1. Do you agree that the FSA should take a more active role to boost the profile of food hygiene/standards work within local</p>	<p><i>PROBE</i></p> <ul style="list-style-type: none"> - <i>Would you want to be involved in an online forum</i> - <i>How often would you use a closed enforcement section of the FSA website</i>

<p>authorities</p> <ul style="list-style-type: none"> ○ <i>Agree or disagree? Why?</i> ○ <i>If agree, in what ways could they do this (in practice)?</i> <p>2. What benefits would there be in creating a permanent online forum for dialogue between the FSA and Local Authorities (and between Local Authorities) which could be used as and when needed to consult Local Authorities e.g. when developing new guidance</p> <ul style="list-style-type: none"> - <i>Agree or disagree that this would be useful? Why?</i> - <i>What would stop you / encourage you to use it?</i> - <i>What would you want it to include / want to be able to do on it? – LIST any key features, information</i> - <i>Any other suggested improvements relating to FSA role and interaction between FSA and Local Authorities?</i> 	
<p>Information about what next</p>	
<p>A full published report of the findings from the consumer and professional forums will be available from the summer</p> <p>What's next?</p> <p>As you may be aware he FSA Board discussed the Review of Delivery of Official Controls on 5 March 2013.</p> <p>Through the commitment and considerable efforts of you, our local authority (LA) delivery partners, providing evidence and intelligence through participation in these on-line forums, and as part of our on-line survey, workshops</p>	

and case studies, we have been able to gather a wealth of information which has greatly improved our collective understanding of the current delivery model.

Overall, the evidence indicates that despite the system remaining under pressure, you have told us that LAs are able to deliver the service. But it has also put into focus the need for the FSA to collaborate better and has provided some valuable suggestions for how we can work together in the future to deliver the best outcomes for consumer protection.

The delivery of official controls and the relationship between the FSA and LAs remains a strategic priority for the Agency. The review itself is now coming to an end but a further paper on how future work will be taken forward soon be going to the FSA Board. This will outline how the vital evidence gathered as part of the review will be built on the help us improve the system further.

I would like to thank you again for your active participation and contributions to the review and this forum. The information you have provided us with here will be essential in helping us determine where specific improvements might be made, and how we might best work together to strengthen official controls delivery in the UK.