

## LOCAL AUTHORITY RECOVERY ROADMAP

### Report by Maria Jennings, Director for Regulatory Compliance, People and Northern Ireland

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#### 1. Summary

1.1 This paper sets out a plan for recovery of local authority (LA) delivery of official food controls and related activities. The plan has two phases and runs from 1 July 2021 to April 2023 and beyond. It focusses on re-starting the regulatory delivery system in line with the Food Law Codes of Practice for the highest risk establishments while providing greater flexibility for lower risk establishments. The paper also sets out plans for monitoring LA delivery during the recovery period and for developing a LA performance and management strategy.

1.2 The Board is asked to:

- **Consider and agree** the recovery plan
- **Consider and agree** the proposals for monitoring LA delivery during the recovery period
- **Consider and comment** on the proposal to develop appropriate key performance indicators and a performance support and management strategy.

#### 2. Introduction

##### Pre-pandemic expectations of LAs

2.1 LAs are responsible for delivering official controls and related activities in most food establishments in England, Wales, and Northern Ireland to ensure that businesses are complying with the requirements of food law and to enforce those requirements where necessary. These controls and activities include inspections, audits, surveillance, sampling and other types of interventions. They relate to food hygiene (microbiological quality and contamination of food by micro-organisms or foreign matter) and food standards (composition, chemical contamination, adulteration and labelling of food).

2.2 The Official Controls Regulation (EU) 2017/625 requires official controls to be carried out regularly and on a risk basis with appropriate frequency. The nature and frequency of some official controls that LAs are responsible for is prescribed in specific legislation and others are recommended within FSA guidance. The official controls set out in legislation include food/feed import controls at points of entry; initial and full approval visits for establishments involved with handling/processing animal products; and official control monitoring relating to shellfish harvesting areas. Official controls relating to the inspection of fishing vessels are recommended in FSA guidance.

- 2.3 In most cases, however, the nature and frequency of planned controls is contained in the Food Law Codes of Practice (separate Codes apply in England, Wales, and Northern Ireland). LAs are legally required to have regard to the Codes when performing their statutory food functions. LAs have planned intervention programmes in place that reflect the frequencies set out in the Codes. The Codes specify that new businesses should routinely receive an initial inspection within 28 days of registration or from when the LA becomes aware that the business is trading. There is, however, flexibility in the Codes enabling LAs to prioritise initial inspection of high-risk establishments. At the initial inspection, the risk posed by the establishment is assessed and the risk category that the business falls into is determined using intervention rating schemes – which consider a range of risk criteria – set out in the Codes. There are separate intervention rating schemes for hygiene and for standards. The risk category (A to E for hygiene and A to C for standards where A is the highest risk), in turn, determines when the next intervention is due. The frequency is greatest at the highest risk establishments (see Annex A).
- 2.4 The Codes include provisions on sampling and subsequent analysis and examination. Sampling is an essential function providing intelligence and evidence on the safety and authenticity of food placed on the market. The Codes also give direction on reactive work that LAs are responsible for. This includes enforcement where there is non-compliance, managing food incidents and food hazards, and investigating and managing complaints.
- 2.5 Prior to the pandemic, LAs were expected to undertake all official controls and related activities prescribed in specific legislation and those recommended within specific FSA guidance as well as meeting the requirements of the Codes of Practice.
- 2.6 LAs in England and Wales are also responsible for delivery of animal feed controls. Feed Law Codes of Practice in each country set out our expectations for this. Prioritisation of official feed controls in line with the Codes has been, and will continue to be, managed within the existing arrangements for the Feed Delivery Programme in each country.

### **Current expectations**

- 2.7 During the pandemic, we adjusted our expectations of LAs. This was in recognition of the challenges LAs were facing in delivering their statutory food functions whilst having to prioritise protecting communities from COVID-19. It also reflected the changing business landscape, with many food businesses closing or changing operations. This enabled LAs to target scarce resources at the most high-risk establishments while deferring planned interventions, particularly for low risk premises. The Board agreed in December 2020 that the associated guidance and advice should be extended to end June 2021 ([FSA 21-03-08](#)). Annex B provides a summary of that guidance and advice.

## **LA recovery**

- 2.8 Proposals have now been developed for recovery of planned interventions and other activities by LAs at food establishments during the period from 1 July 2021 through to 2023/24.

## **3. Evidence and Discussion**

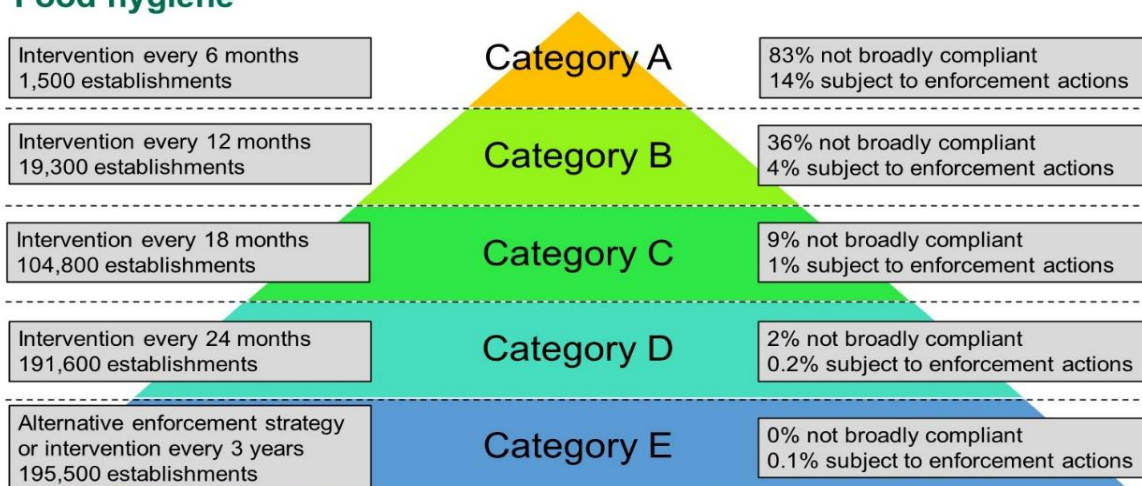
### **Background context**

- 3.1 The recovery roadmap takes account of the following points:

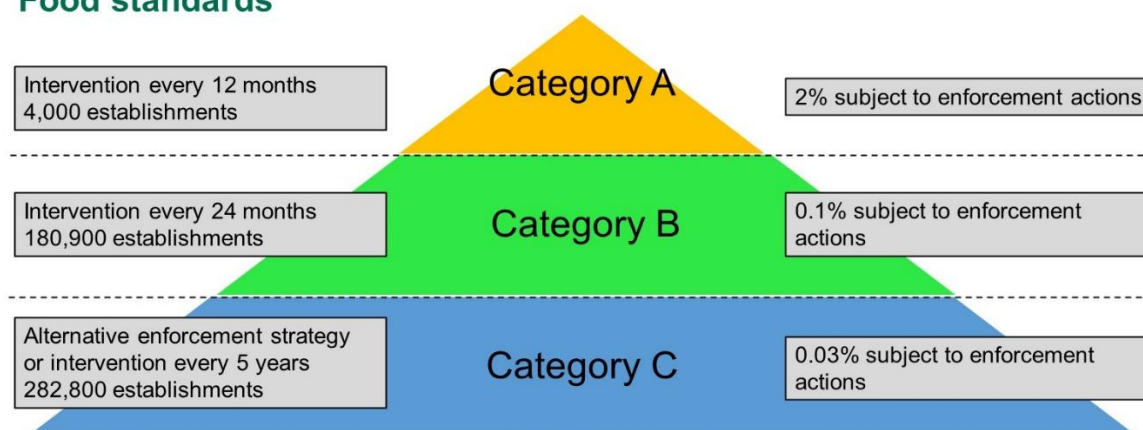
- Numbers of 'new' food businesses have significantly increased and, although some may never have started trading and others will have ceased trading, the risks associated with them remain largely unknown (we are tracking numbers and will report latest figures in the Q4 Performance and Resources report for the Board's Business Committee meeting in June).
- Some existing businesses may have changed hands while others may start up to capitalise on potential additional trade from staycations etc this year.
- Existing businesses will gradually be re-opening, many after prolonged closure, as restrictions on businesses in the hospitality sector on eating onsite are lifted, while others will continue to diversify activities to adapt to ongoing changes in the market.
- The highest risk establishments – which represent a relatively small proportion of the total number of establishments – may have missed one, two or, in a very small number of cases, three planned interventions.
- LA resources have been – and in many cases still are – diverted during the pandemic to activities related to reducing the spread of COVID-19.
- LAs are anecdotally reporting that significant resource is currently being used for non-statutory, but important, wider government priorities such as export certification.
- LAs are also anecdotally reporting that in some cases hygiene standards have reduced since the onset of the pandemic.

- 3.2 We have taken account of the profile of establishments across the risk categories, the levels of compliance across all businesses in each category and the typical annual percentage of establishments inspected in a given year that are subject to at least one formal enforcement action. This is summarised below based on 2019/20 LAEMS data for England, Wales and Northern Ireland (numbers have been rounded).

### Food hygiene



### Food standards



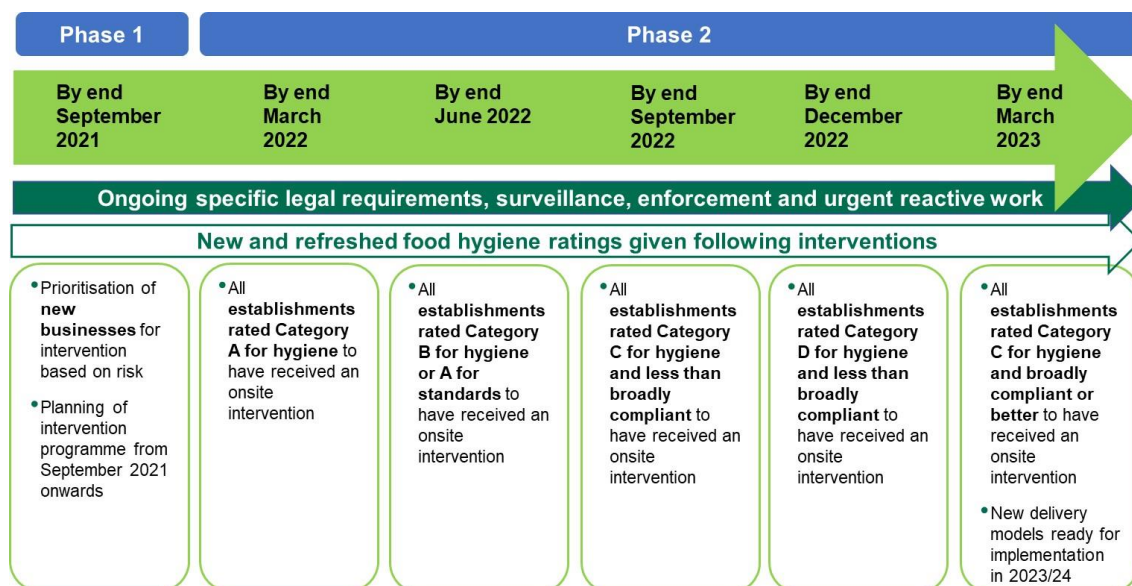
### Recovery plan outline and timings

3.3 There are two phases to the recovery plan:

- Phase 1 - 1 July to 30 September 2021.
- Phase 2 – 1 October 2021 to April 2023 and beyond.

3.4 In essence, Phase 2 will continue until the FSA's plans for a new food standards delivery model and a revised food hygiene intervention rating scheme are in place. The new delivery model for food standards is being piloted in England and Northern Ireland to end December 2021 prior to national rollout from April 2023. Work to review and revise the food hygiene intervention rating scheme is planned to commence shortly for implementation in 2023/24. This is part of the proposed work outlined to the Board in December last year (see [FSA 20-12-09](#)) and is referenced in the paper on the Achieving Business Compliance Programme (FSA 21-05-03).

3.5 The key milestone dates within the recovery plan, and Phase 2 in particular, are illustrated below.



## Objectives

3.6 The plan aims to ensure that LA resources are targeted where they add greatest value in providing safeguards for consumers, with a focus on securing compliance in non-compliant businesses. In this respect, it is consistent with the direction of travel being taken for the new standards delivery model and our intentions in relation to reviewing and revising the food hygiene intervention rating scheme. In particular, the plan aims to achieve the following:

- To ensure that LAs:
  - return diverted resources to food teams;
  - can identify and focus on those businesses that are trading;
  - revert to the expected inspection frequencies in the Food Law Codes of Practice for those businesses posing the greatest risk to public health/consumer protection; and
  - identify where risks in low risk establishments have changed through assessment of intelligence and information gathering as part of ongoing proactive surveillance.
- To improve hygiene and standards compliance and reduce risks by focusing activity where non-compliance is identified and by undertaking appropriate follow-up and enforcement action.
- To ensure more routine operation of the Food Hygiene Rating Scheme (FHRS).

## Principles and activities common to Phase 1 and Phase 2

3.7 Some important principles underpin both phases:

- When intelligence suggests risks have increased (irrespective of the risk category) LAs should undertake interventions to assess and address those risks.
- When an onsite intervention is undertaken, LAs should programme subsequent interventions in line with the Codes of Practice.

- LAs should give new food hygiene ratings where appropriate interventions are undertaken.
- Where non-compliance is found at any intervention, LAs should take appropriate action to secure compliance including formal enforcement action where necessary.
- Remote assessment may be used by LAs in certain circumstances – this includes to help inform the need for onsite intervention at low risk premises where an intelligence based approach is being used and, in England, in certain limited cases for FHRs requested re-visits (this takes account of the findings of an [evaluation of the use of remote assessment by LAs for regulating food businesses](#) which reported in March).

3.8 In both Phase 1 and Phase 2, LAs will be expected to continue to deliver the following:

- Official controls where the nature and frequency are prescribed in specific legislation or recommended by FSA guidance.
- Reactive work including, enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints.
- Sampling in accordance with the LA sampling programme and any follow-up necessary in relation to the FSA Surveillance Sampling Programme.
- Ongoing proactive surveillance to obtain an accurate picture of the local business landscape and identify open/closed/recently re-opened/new businesses; as well as businesses where there has been a change of operation, activities or Food Business Operator (FBO).
- For 'new businesses', consideration of registration information and intelligence with appropriate onsite interventions where there are concerns around public health/consumer protection.
- For 'new businesses' where consideration of registration information/intelligence indicates low risk, initial visits should be prioritised and undertaken in accordance with the Codes of Practice.

3.9 In Phase 1, LAs will also be expected to undertake the following:

- a) Managing the expected increase in necessary reactive work resulting from the lifting of restrictions in the hospitality sector, which will include carrying out interventions at high-risk establishments.
- b) Planning for resumption of planned intervention programmes for high-risk category and non-compliant establishments in Phase 2.

3.10 In Phase 2, in addition to the activities listed at para 3.8, LAs will also be expected to undertake the following:

- a) Implementing planned intervention programmes for high-risk category and non-compliant establishments in accordance with the timeline shown above.
- b) Implementing an intelligence-based approach for low risk category establishments.

- c) Sampling in accordance with the LA sampling programme or as required in the context of assessing food business compliance.
- d) Responding to FHRS requested revisits in line with the timelines specified in the FHRS Brand Standard for England or the statutory guidance in Wales and Northern Ireland.

Details are provided at Annex C.

## **Risks**

3.11 The recovery plan anticipates that:

- there will continue to be additional demands and expectations on LAs in relation to compliance and enforcement of COVID rules as sectors re-open over the next few months;
- urgent reactive food safety work will increase in the short term as restrictions in the hospitality sector are lifted;
- planned interventions for food hygiene and food standards will be more complex to undertake and will take longer as they must be undertaken in a COVID safe way;
- where compliance standards have dropped, the levels of required follow-up and enforcement action needed to address the risks to public health/consumer protection will be greater; and
- the new food standards delivery model will be implemented in 2023/24 and the food hygiene intervention rating scheme will be reviewed and revised for implementation in 2023/24. This means that during this period there will be a significant amount of work for LAs and the FSA to undertake in preparation.

3.12 We recognise that ongoing uncertainties related to the course of the pandemic may have consequences for deployment of LA resources and delivery of food controls. Some LAs may be unable to deliver at the pace set out in the recovery plan. In addition to this, significant LA resource may be required for export certification to enable trade and support economic growth in line with wider government objectives. There may also be an emphasis at local level on support for businesses to encourage economic growth leading to a lighter touch being taken to enforcement.

3.13 We have ensured that the approach to recovery is as simple as possible to implement and is grounded in well-established LA ways of working. The plan provides Food Teams with clarity on the FSA's expectation that resources are focussed on protecting public health and consumer interests in relation to food. We will write again to all LA Chief Executives to emphasise their statutory responsibilities in relation to food (and feed where appropriate) and the need to protect consumers and to safeguard the credibility of the FHRS. We will urge them to ensure resources that have been diverted are returned to food (and feed) teams and are protected for future delivery in line with the Codes of Practice.

- 3.14 Monitoring delivery will be key to identifying LAs struggling to deliver against the expectations of the plan and to identifying those that require our ongoing support. This is considered further below.
- 3.15 We recognise the potential impact on operation of the FHRS for low-risk category establishments where interventions are not taking place during recovery. More routine operation will, however, recommence for new food businesses and for high-risk and non-compliant businesses with new ratings being given following inspection. More routine undertaking of requested re-visits will also help to incentivise businesses to make improvements with a view to getting a higher rating.

### **Legal position**

- 3.16 To implement the recovery plan in England and Northern Ireland, we will rely on a provision in the Food Law Codes of Practice that enables the FSA to advise LAs to depart from the nature and frequency of intervention specified in the intervention rating schemes in response to a public health emergency. In Wales, we anticipate that we will continue to rely on using FSA powers in the Food Standards Act 1999 for this purpose.

### **LA views**

- 3.17 We shared and discussed our thinking and the draft plan with the National Food Hygiene Focus Group and the National Food Standards and Information Group, both of which include representatives from LAs in England, Wales and Northern Ireland. In Wales, we also sought views from the Safe, Sustainable, Authentic Food Wales Local Authority COVID-19 Recovery Sub-Group (which includes LA and Welsh Government representatives) and in Northern Ireland with the NI Food Managers Group.
- 3.18 LA colleagues recognise that they are all starting from a different position in terms of the impact that COVID-19 has had to date, the challenges they will face during the recovery period and the resources that they have available. Given this, they generally considered that, whilst it will be challenging to deliver, the framework the recovery plan provides is the most pragmatic and practical approach that could be adopted to restart the system. It will also enable those LAs that can do so to move at a faster pace in realigning with the Codes of Practice for lower risk establishments. The importance of making this flexibility clear in our communications with LAs was emphasised, particularly by LAs in Wales and Northern Ireland. We recognise this so will be careful to ensure that the recovery plan reflects the position and operational context in each of the countries.
- 3.19 LAs recognise the risks to delivery that we have identified above and share our concern about maintaining the credibility of FHRS. The potential impact on resources of an intensive initial period of addressing non-compliance, particularly in traditionally higher risk establishments, was also emphasised.



- 3.20 The prioritisation and initial inspection of new food businesses is one of the key concerns that LA colleagues have, given the numbers involved and the resource required.
- 3.21 On food standards, LAs indicated that the new requirements on allergen labelling for products pre-packed for direct sale, which apply from 1 October this year, should be a factor in considering the need to prioritise interventions for some medium and lower risk establishments (Category B and C for food standards). This has been reflected in the plan (see Annex C).
- 3.22 LAs also raised concerns about difficulties in recruiting new officers. It is anticipated that recent changes to the Codes of Practice in England and Northern Ireland, which widen the baseline qualifications and the implementation of an activity-based competency framework, will help ease the situation. Recruitment and retention, however, is an issue more broadly for LA regulatory services and is being considered in England on a cross-Government basis by the Ministry of Housing, Communities & Local Government (MHCLG) led Regulatory Services Review Task & Finish Group. One of the Group's workstreams in considering resources, qualifications and competency, and recommendations are expected before the end of the summer.
- 3.23 At the more strategic level in England, we shared the recovery plan with the Regulatory Services Review Task & Finish Group as well as another MHCLG led cross-Government group – the COVID-19 Compliance Working Group. LA representation on these groups is at the Chief Executive or Head of Service level. The Local Government Association and Association of Chief Trading Standards Officers are also represented. At this level also, LA colleagues were generally positive about the plan and appreciated that we recognise the circumstances they are in. It was considered that, for most LAs, what we propose should be deliverable but for some it may be challenging.

### **FSA support for delivery**

- 3.24 We have continued to onboard LAs to the Register a Food Business service during the pandemic as and when they have been willing and able to do so. LAs have commented on how useful access to the service has been during this period, particularly with the growth in food business registrations and LA staff having to work more from home. As highlighted in the paper on the Achieving Business Compliance Programme (FSA 21/05/03), we will be continuing to encourage and work with other LAs to increase numbers using the service.
- 3.25 To help mitigate the risks to delivery we will provide support to LAs, particularly in relation to assessing the risks associated with the significantly increased numbers of 'new' food businesses and in prioritising these for initial inspection. We are, for example, prioritising work to build on an FSA project undertaken last year to use AI (artificial intelligence) to predict food hygiene ratings. This could help LAs to prioritise their activities, particularly in relation to initial inspections of new businesses/businesses changing activities etc, by giving an indicative rating that could be used as part of the risk-assessment to determine priority for intervention. We are also exploring development of a digital

approach to identifying whether new businesses have actually started trading after registration and whether other businesses that have been trading continue to do so. LAs told us that they would welcome any tools like this that will help them prioritise new businesses for initial inspection.

3.26 We will also provide a detailed Q&A document for LAs to ensure clarity on what is expected and to give guidance and advice on the different elements of the recovery plan. LAs considered such a Q&A would be key and have highlighted issues that we should cover. Importantly, it should make clear that those LAs able to move at a faster pace towards recovery should do so. Other examples include providing clarity on when remote assessment may be used and on when partial inspections may be sufficient. The Q&A should also provide further advice on what intelligence and other information may be used to identify any lower risk establishments where it would be appropriate to undertake on-site intervention.

### **FSA monitoring of LA delivery**

3.27 We propose to continue to engage with LAs on a regular and ongoing basis through established liaison groups in England, Wales and Northern Ireland to obtain feedback and intelligence. To help us with this, we will develop a set of standard questions to ask LAs.

3.28 We will also consider the 2020/21 LA monitoring returns and, where significant resource issues are identified, engage with LAs to explore what support we might be able to provide. In addition, we will make clear to LAs that where they are unable to deliver in accordance with the plan, they should alert us so that we can similarly engage with them to explore how we might help.

3.29 We intend to use FHRS data to monitor on a quarterly basis the numbers of businesses 'awaiting inspection', numbers of new ratings being published and levels of compliance etc. We also propose to develop bespoke end of year returns for 2021/22 and 2022/23 (that will replace the LAEMS returns) to obtain a picture of delivery across the year. We recognise the importance of identifying the data requirements for these returns as soon as possible so that LAs can ensure they capture the relevant data.

3.30 Working with LAs, we will develop appropriate key performance indicators based on the data collected. We will also develop a performance support and management strategy that reflects the expectations and delivery timelines within the recovery plan. The approach to supporting LAs to meet our expectations will need to reflect the particular challenges that individual LAs are facing.

3.31 The strategy will also include the process for escalating cases where LAs are unable to meet our expectations. This includes raising concerns at Chief Executive level to gain reassurances that action will be taken to ensure food teams have the capacity and capability needed to fulfil the LA's statutory responsibilities in relation to food.

#### 4. Conclusions

- 4.1 The recovery plan outlined in the paper will restart LA planned interventions in a risk-based manner. It enables resources to be targeted where they add greatest value in providing safeguards for consumers and securing compliance in persistently non-compliant businesses. This is consistent with what we want to achieve through the new standards delivery model and the revised food hygiene intervention ratings scheme.
- 4.2 The Board is asked to:
- **Consider and agree** the recovery plan
  - **Consider and agree** the proposals for monitoring LA delivery during the recovery period
  - **Consider and comment** on the proposal to develop appropriate key performance indicators and a performance support and management strategy.

**Annex A – Food Law Codes of Practice – intervention frequencies**

The tables below summarise the frequency of interventions for different risk categories where A is the highest risk.

**Food hygiene**

<b>Risk category</b>	<b>Minimum intervention frequency</b>
A	At least every 6 months.
B	At least every 12 months.
C	At least every 18 months.
D	At least every 24 months.
E	A programme of alternative enforcement strategies or interventions every three years.

**Food standards**

<b>Risk category</b>	<b>Minimum intervention frequency</b>
A	At least every 12 months.
B	At least every 24 months.
C	Alternative enforcement strategy or intervention every five years.

## **Annex B – Current expectations of LAs**

### **Introduction**

We expect LAs to undertake sector specific official controls and official controls to support trade and enable export. They also include other high priority activities needed to address the risks in the food system at this time which will include carrying out overdue/due interventions in those businesses where proactive surveillance suggests there is a significant risk. These controls and activities must be undertaken as a minimum.

LAs may defer planned interventions but, where they have the resources to do so, they should be deployed to undertake other official controls and related activities focussing on the high-risk and non-compliant businesses.

### **Minimum controls and activities**

LAs must as a minimum continue to undertake the following official controls and associated activities in accordance with pre-pandemic requirements:

- Food/feed import controls at points of entry.
- Official control monitoring relating to shellfish harvesting areas.
- Conditional and full approval visits.
- Inspection of fishing vessels.
- Management of food incidents and hazards (including outbreaks of foodborne illness).
- Investigation and management of complaints.
- Enforcement action in case of non-compliance.

They must also undertake ongoing proactive surveillance to obtain an accurate picture of the local business landscape and identify:

- open/closed/recently re-opened/new businesses;
- change of operation, activities or FBO.

Where concerns around public health/consumer protection are identified through the ongoing proactive surveillance, LAs must then undertake appropriate interventions so that they can assess and address the risks.

### **Other priorities**

LAs should give medium priority to the following:

- Establishments overdue/due an intervention not already captured above that are rated:
  - all A, all B, and non-compliant C and non-compliant D for hygiene;
  - A / high risk for standards.
- Establishments given an 'awaiting inspection' FHSRS status including new businesses (where registration information/other intelligence did not raise any concerns around public health/consumer protection).
- Establishments where applying COVID-19 requirements - e.g. social distancing - might impact on food safety or the ability of the LA to conduct a physical inspection.

They should give low priority to the following:

- Establishments overdue/due an intervention not already captured above that are rated:
  - compliant C and compliant D, all E for hygiene;
  - B or C / medium or low risk for standards.

**Annex C – Detailed timeline for Phase 2 of the recovery plan**

This is detailed in the table below.

<b>Activity/Category</b>	<b>Timeline</b>	<b>Expectation</b>
Food/feed import controls at points of entry.	Ongoing	In accordance with relevant legislative requirements.
Official control monitoring relating to shellfish harvesting areas.	Ongoing	In accordance with relevant legislative requirements.
Conditional and full approval visits.	Ongoing	In accordance with relevant legislative requirements.
Inspection of fishing vessels.	Ongoing	In accordance with separately issued FSA advice.
Proactive surveillance to obtain an accurate picture of the local business landscape and to identify: <ul style="list-style-type: none"> <li>- open/closed/recently re-opened/new businesses;</li> <li>- change of operation, activities or FBO.</li> </ul>	Ongoing	Consideration of registration information and intelligence on the food business establishment identified through surveillance. Undertake appropriate onsite interventions where there are concerns around public health/consumer protection.
New food business establishments where consideration of registration information/intelligence indicates low risk.	Ongoing	Initial visits should be prioritised and undertaken in accordance with the Food Law Codes of Practice.
Management of food incidents and hazards (including outbreaks of foodborne illness).	Ongoing	In accordance with the Food Law Codes of Practice.
Investigation and management of complaints.	Ongoing	In accordance with the Food Law Codes of Practice.
Enforcement action in case of non-compliance.	Ongoing	In accordance with the Food Law Codes of Practice and the local authority's enforcement policy.
FHRS requested revisits.	Ongoing	Wales and Northern Ireland - within three months of request if a charge is made and within six months of no charge in line with legislation. England – within three months of request if a charge is made and within six months of no charge but with use of remote assessment in place of onsite visit in limited circumstances on a trial basis (with evaluation in place).
Sampling.	Ongoing	In line with local authority sampling programme or as required in the context of assessing food business compliance, and any follow up necessary in relation to the FSA Surveillance Sampling Programme.
Category A for hygiene.	Over the period to end of March 2022.	All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Food Law Codes of Practice.

Activity/Category	Timeline	Expectation
Category B for hygiene.	Over the period to end of June 2022.	All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Food Law Codes of Practice.
Category A for standards.	Over the period to end of June 2022.	All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Food Law Codes of Practice.
Category C for hygiene – less than broadly compliant (FHRS 0, 1 or 2).	Over the period to end September 2022.	All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Food Law Codes of Practice.
Category D for hygiene – less than broadly compliant (FHRS 0, 1 or 2).	Over the period to the end of December 2022.	All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Food Law Codes of Practice.
Category C for hygiene – broadly compliant or better (FHRS 3, 4 or 5).	Over the period to the end of March 2023.	For establishments with two consecutive food hygiene ratings of 5 (or equivalent stands if outside scope of FHRS) one intervention may be missed and then the establishment put back in the system for interventions in accordance with the Codes of Practice. For other establishments – those with hygiene ratings of 3 or 4 (or equivalent of outside the scope of FHRS - should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Codes of Practice.
Category D for hygiene – broadly compliant or better (FHRS 3, 4 or 5).	Ongoing	No interventions will be required unless intelligence/information suggests that risks have increased/standards have fallen or if the establishment is otherwise considered a priority for intervention due to the risk posed.
Category E for hygiene.	Ongoing	No interventions will be required unless intelligence/information suggests that risks have increased/standards have fallen or if the establishment is otherwise considered a priority for intervention due to the risk posed.
Category B for standards.	Ongoing	No interventions will be required unless intelligence/information suggests that risks have increased or if the establishment is otherwise considered a priority for intervention due to the risk posed or because of the impact on the business of the new requirements on allergen labelling for products prepacked for direct sale.

Activity/Category	Timeline	Expectation
Category C for standards.	Ongoing	No interventions will be required unless intelligence/information suggests that risks have increased or if the establishment is otherwise considered a priority for intervention due to the risk posed or because of the impact on the business of the new requirements on allergen labelling for products prepacked for direct sale.