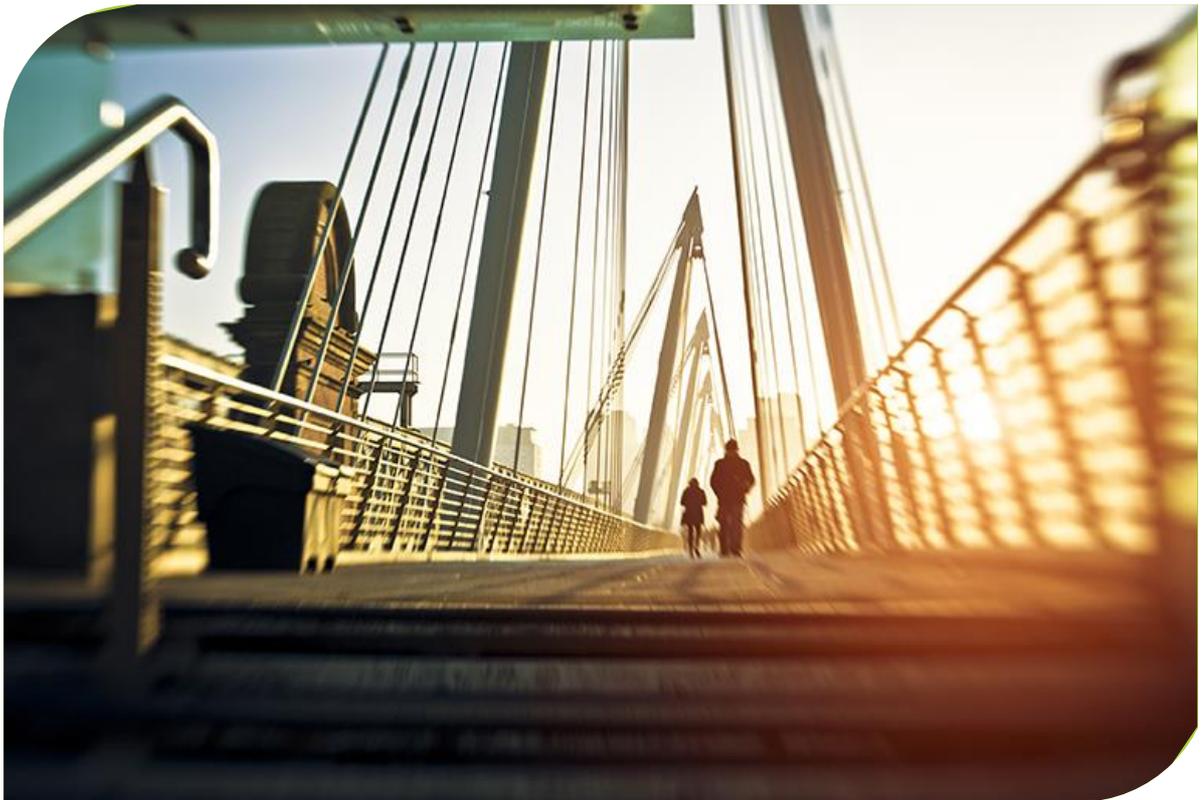


Evaluation of the National Inspection Strategy Pathfinder

A report prepared for the Food Standards Agency by IFF
Research

September 2018



Contents

1	Executive summary	3
	To what extent can primary authorities use business data to predict local level compliance?	4
	Data accessibility	5
	Promoting the rationale of national inspection strategies to stakeholders	6
	Public safety and trust are paramount	8
	Recommendations	9
2	Background and Methodology	11
	Research Background	11
	The National Inspection Strategy Pathfinder	11
	Research objectives and methodology	13
3	To what extent can primary authorities use business data to predict local level compliance?	16
	How Food Hygiene Rating Scheme ratings predicted by primary authorities compared to local authority inspection ratings	16
	Reasons for variation between predicted and actual ratings	18
	Reasons for variations of particular interest	23
	How often primary authorities recommended that a local authority inspection be carried out	26
4	Enablers for success	27
	Data accessibility	27
	Promoting the rationale of national inspection strategies to stakeholders	33
	Public safety and trust are paramount	38
5	Conclusions and recommendations	45
	Conclusions	45
	Recommendations	46
6	Acknowledgements	48
7	Glossary	49
8	Appendices	50
	Appendix A: Primary authority topic guide	50
	Appendix B: Food business topic guide	54
	Appendix C: Local authority topic guide	58
	Appendix D: Comparison between actual and predicted FHRS ratings	63

1 Executive summary

- 1.1 Six English food hygiene primary authority¹ (PA) partnerships (including one co-ordinated partnership) took part in a pathfinder between October 2017 and March 2018 to explore whether PAs could access and use business compliance data, and how PAs and national inspection strategies (NIS) could play a role in the regulation of food hygiene.
- 1.2 The pathfinder involved PAs accessing business information about outlets that had been inspected by a local authority (LA) officer. Without viewing the most recent inspection report/outcome, the PAs then used this information to complete a compliance assessment in which they would predict a Food Hygiene Rating Scheme (FHRS) rating² for the outlet and determine whether they felt it needed to be inspected or not.
- 1.3 It must be noted that NIS will not necessarily use compliance assessments in the same way as the pathfinder if it is rolled out. Rather, an evaluation of the NIS pathfinder specifically sought to answer the following questions:
 - Can PAs use businesses' own data to accurately predict regulatory compliance at a local level?
 - What needs to be done to make any future NIS a success for food partnerships?
- 1.4 The study comprised of:
 - 12 face-to-face in-depth interviews with the PA partnerships involved in the pathfinder

¹ Local regulation: Primary Authority (Office for Product Safety and Standards, 2017): www.gov.uk/guidance/local-regulation-primary-authority

² The Food Hygiene Rating gives information on the standards of food hygiene found at the time of inspection by a food safety officer from a local authority: www.food.gov.uk/safety-hygiene/food-hygiene-rating-scheme

- 9 telephone in-depth interviews with LAs and PAs not involved in the pathfinder³
- An investigation into 30 variations between predicted and actual FHRs ratings (by comparing compliance assessment information with corresponding LA inspection reports/records)

To what extent can primary authorities use business data to predict local level compliance?

- 1.5 In the majority of cases (80%), PAs' predicted ratings matched with the actual FHRs rating given in the LA inspection, indicating that using business data to predict local level compliance provides reasonable levels of accuracy.
- 1.6 In 15% of cases, PAs' predicted FHRs ratings were lower than the LA inspection ratings, leaving 5% where the PA rating was higher, although where they occurred, variations tended to be small. Of particular interest are those where the PA predicts a FHRs rating of 3-5, but the LA inspection has given a rating of 2. There were only 3 instances where the LA rated an establishment as 2 (no sites were rated as a 0 or 1); in all these instances, the PA rated the sites as a 3 or above. As part of this pathfinder, two of these variations were explored to understand why this might have happened⁴.
- 1.7 There were 7 cases where the PA predicted a rating of 2 (no sites were predicted to be a 0 or 1), and the LA rated the premises as 3 or above. These cases are also of interest.
- 1.8 A key reason for variation in ratings was that PAs were sometimes unable to tell from the information provided by businesses whether historical food hygiene issues had been addressed, leading to caution even when all other evidence pointed towards the outlet in question being compliant.

³ For reporting purposes, this group are referred to as LAs throughout the report.

⁴ The third instance was not explored as the FSA was unable to obtain the LA inspection paperwork during the timeframe of the pathfinder.

- 1.9 Cautiousness could also creep into assessments because some internal audit data that PAs based their assessments on held businesses to a different standard than the legal requirements. This could be addressed by encouraging PAs to focus on contraventions to legislation, rather than breaches of internal standards.
- 1.10 There was also one instance where a PA lacked confidence in business data, feeling that the rating given in the business internal assessments was not justified based on the evidence reported. This highlights the importance of business information including a sufficient level of detail to enable PAs to make a reasoned judgement as to compliance with legislation. Furthermore, it suggests that NIS should allow ongoing dialogue between PAs and businesses to resolve uncertainties.

Data accessibility

- 1.11 The most common types of information used to conduct compliance assessments were audit reports (typically conducted in-house), pest control reports (typically produced by a third party) and historic LA officer inspection reports. Business audit reports were considered most useful because they provide a comprehensive and transparent view of food hygiene practices within food outlets.
- 1.12 In most cases, PAs felt they were able to access sufficient information to complete their assessments. However, in a few cases PAs felt they had too little information to conduct a compliance assessment with confidence. Businesses were sometimes unable to provide the information requested because the format of the information meant it would be too time-consuming to compile and share during the short time period of this study.
- 1.13 In other cases, PAs felt businesses had provided them with too much information, which made the assessment process time-consuming (typically this was true of consumer complaints and pest control data). PAs mentioned a preference for receiving this information in summary form. Some PAs also found the process challenging where conflicting information was provided, or

in cases where some of the information provided was irrelevant to making assessments on food hygiene (again, this was true of some of the complaints data).

1.14 Both businesses and PAs felt strongly that protecting any data shared between the business and the PA was critical.

1.15 LAs felt that the information they held about business outlets was of vital importance to PAs making accurate decisions about the frequency of inspections, including an awareness of the characteristics of businesses (e.g. changes of ownership or management) and the premises they occupy (e.g. whether prone to flooding, of listed status or off the mains water supply). Furthermore, some LAs emphasised that through their other regulatory functions, they could build a fuller picture of whether a business is generally compliant with regulatory standards. Nevertheless, LAs felt it would be difficult to regularly share this information without straining their limited internal resources.

Promoting the rationale of national inspection strategies to stakeholders

1.16 Stakeholders mentioned various positive ways in which NIS could improve food hygiene regulation. It was felt that reducing the frequency of inspections would allow LAs to focus their resources on businesses that are deemed to be higher risk and reduce business interruption. Some stakeholders also suggested the new approach would provide more consistency by having one authority applying regulatory standards across a single business.

1.17 Some stakeholders, however, questioned how much value the implementation of NIS would bring to food hygiene compliance, given that a risk-based approach is already being used among some compliant food business outlets, who are already inspected less frequently, or who are subject to alternative enforcement strategies (e.g. questionnaires) in place of the usual inspections. Furthermore, the pathfinder showed that even where PAs predicted FHRS ratings of 4 or 5, they often still recommended inspections. This was often because they were unable to establish whether historical food hygiene issues had been addressed. It is also possible that

this was partly a bedding-in issue; with PAs recommending inspections due to a lack of confidence when conducting compliance assessments in this way for the first time.

1.18 There were also considered to be limitations as to which types of businesses would be suitable for implementing a NIS. Many felt only 'low-risk' businesses should be able to do so, although there were different views as to what 'low-risk' means. For instance, some felt supermarkets were higher risk because of the breadth of food activities they cover, while others felt they were better-equipped to manage compliance because of their size. Further, the pathfinder showed that accessing and using business' data for membership organisations may present more challenges; further exploratory work in this area would assist in understanding those challenges.

1.19 Workload challenges could also present a barrier to stakeholder buy-in. This was an issue during the pathfinder, because the workload was irregular and often fell to one or two individuals within PAs and businesses, with little resilience if there was absence or a change in staff. While the aim of NIS is to target LA resources more effectively, a few PAs perceived there to be no net benefit in terms of resourcing if work is simply redistributed from LAs to PAs – and some even felt NIS could increase the net workload across authorities, because PAs would take on more work while LAs continued to do the same amount (but focussed on higher-risk businesses). Although one of the principles of the ROF is that *businesses should meet the costs of regulation*, this message does not appear to have been widely taken on board.

1.20 Some LAs were concerned about the potential impact of reducing workloads for EHOs, fearing that reduction in their responsibilities could lead to staff cuts. There were also concerns that PA partnerships had already made businesses more reluctant to engage with LA officers, and that NIS would exacerbate this situation.

1.21 To summarise, while most stakeholders understood the idea of NIS, some – especially LAs – need convincing that the rationale behind it (i.e. that LAs will

be able to divert saved resource to higher-risk and new businesses) will work in practice.

Public safety and trust are paramount

- 1.22 Careful consideration needs to be given to how NIS will be integrated into the current FHRS. Stakeholders reported a high level of trust in FHRS and it is therefore important for the brand reputation of businesses and also to the credibility of food hygiene regulation as a whole.
- 1.23 Some stakeholders felt that a reduction in the frequency of inspections could lead to reduced consumer confidence in food hygiene regulation. LAs were also concerned about how the public would respond to increased business involvement in regulation, especially if they perceived this to be the public and private sector 'cosying up' and a move towards businesses 'marking their own homework'.
- 1.24 Some stakeholders expressed fears that implementing NIS could increase the risk to public health. Some – particularly LAs – felt it could lead to complacency among businesses if the frequency of inspections by LAs is reduced. A few LAs also expressed concerns about whether businesses will be fully transparent in the data they provide as part of the NIS, either because they want to achieve a good FHRS rating to maintain / enhance their reputation or because of staff rewards or bonuses for compliance.
- 1.25 There was a consensus that some form of oversight is required for NIS to be a success, such as the verification of a random sample of PA decisions (either by the FSA or by other LAs) and the introduction of eligibility criteria to ensure only suitable businesses and PAs become part of the scheme.
- 1.26 The FSA is currently developing a standard that PA partnerships would need to meet to operate a NIS for food hygiene and/or food standards, and

guidance on how partnerships can meet the standard.⁵ Furthermore, the FSA is also developing assurance standards that will determine how the FSA will assess NIS proposals and what oversight the FSA will have of PA partnerships operating a NIS.⁶

Recommendations

1.27 Key recommendations for making NIS a success include:

- **A level of consistency is needed to maintain faith and credibility in the system.** This could be in the form of standards in how a NIS is implemented and assessed, as well as minimum competencies for PAs. This is something the FSA is currently developing. In addition, there is a need to ensure a set of common standards are applied to internal or third-party audits, given the importance of these in informing the assessments.
- **Eligibility criteria should be in place to vet which food partnerships can implement a NIS.** Businesses need to have a proven track record of being compliant, however that is defined. This is something the FSA is currently developing.
- **NIS may be more challenging for membership organisations.** This could be tested by further exploratory work.
- **Businesses will need to be reassured about the extent to which their data will be made openly available (e.g. via FOI requests).** This is critical to getting their buy-in.
- **A way of recording and sharing whether non-compliances with food safety requirements picked up by internal, second and third-party audits have been addressed would increase PAs' faith in business data.** It

⁵ Primary Authority National Inspection Strategy Draft Criteria and Guidance (FSA, 2018): www.food.gov.uk/sites/default/files/media/document/PA%20NIS%20Draft%20Guidance%20on%20NIS%20Criteria.pdf

⁶ Primary Authority National Inspection Strategy – Assurance Model (FSA, 2018): www.food.gov.uk/sites/default/files/media/document/PA%20NIS%20Assurance%20Model%20options%20paper.pdf

should also be assumed that some ongoing dialogue between businesses and PAs will be necessary to bridge any gaps in information.

- **A comprehensive communications strategy is needed to further involve stakeholders in how the scheme may work, and to allay their concerns.**
- **The FSA will need to be mindful of the resourcing and practical challenges of accessing and sharing data (for all stakeholders).** This is to ensure information requirements are feasible and not too labour intensive. One suggestion would be to have a list of information that would ideally be provided, and if businesses are unable or unwilling to provide anything from the list, they would need to state a reason for the NIS to be recognised by the FSA.
- **There is a need to define how NIS will interact with FHRS, as ratings are currently generated by LA inspections.** This is something that the FSA is considering.
- **LAs (not in food partnerships) should be involved in NIS.** Their local knowledge was considered an important source of information, and could possibly facilitate a triangulation of data which would lend integrity to the system. In addition, their involvement may ease fears that NIS could be a threat to their jobs. From a practical perspective, they could provide some sort of independent overview to the process to reassure the public of the scheme's integrity, although some mentioned this role would be better suited to the FSA.
- **Some degree of public consultation may be required, and the FSA should consider how the changes could be communicated to the public.** Strong eligibility criteria and oversight are likely to be part of this message, which will need to reassure the public of continued food safety. This is something the FSA is currently working on.⁷

⁷ Ninth Regulation Our Future Newsletter (FSA, 2018): www.food.gov.uk/about-us/ninth-regulating-our-future-newsletter

2 Background and Methodology

Research Background

- 2.1 As part of the *Regulating Our Future* (ROF) programme the FSA is exploring the role of primary authorities (PAs) in the regulation of multi-site food businesses or groups of food businesses– looking to put an increased focus on the controls that operate at business level rather than each individual outlet.⁸
- 2.2 PAs may take account of all available sources of information on how a food business is operating at an overall level. This includes systems for managing compliance and data generated through internal, second party, third party and regulatory checks. It is envisaged that this will generate a more accurate picture of compliance across a business's operations.
- 2.3 After considering all this information a PA could implement a national inspection strategy (NIS) which controls the number of proactive interventions across a business. If a business is deemed to be well managed then the PA could reduce the frequency at which outlets are inspected by local authorities (LAs). This would allow LAs to free up resources to focus on establishments which pose a greater risk to public health.⁹

The National Inspection Strategy Pathfinder

- 2.4 To explore how PAs and NIS could play a role in the new regulatory regime for food hygiene, six English PA partnerships took part in a pathfinder between October 2017 and March 2018¹⁰. These comprised:

⁸ Regulating Our Future (FSA, 2017): www.food.gov.uk/sites/default/files/media/document/rof-paper-july2017.pdf

⁹ Primary Authority National Inspection Strategy Feasibility Study (FSA, 2017): www.food.gov.uk/sites/default/files/media/document/nis-feasibility-study.pdf

¹⁰ The pathfinder took place between October 2017 to March 2018, however the months over which each partnership completed their assessments varied slightly, e.g. some started later than October, and some finished earlier than March.

- Waitrose and their food hygiene primary authority Bracknell Forest Borough Council;
- Morrisons and their food hygiene primary authority Wakefield Metropolitan Council;
- Busy Bees Nurseries and their food hygiene primary authority Lichfield District Council;
- Sainsbury's and their food hygiene primary authority Cherwell District Council;
- Boots and their food hygiene primary authority Rushcliffe Borough Council; and
- The National Federation of Fish Friers (NFFF) and their food hygiene primary authority City of Bradford Metropolitan District Council.¹¹

2.5 Five of these are direct partnerships while one (NFFF/Bradford) is a co-ordinated partnership.¹²

2.6 During the pathfinder, businesses notified their PA partners promptly after any of their outlets were inspected by the LA in England, and provided business compliance information about that outlet to the PA. The PA was not informed of the outcome of the LA inspection, and was not aware of the FHRS score that the inspecting LA had awarded.

2.7 Businesses and PAs agreed together which information would be used to inform the compliance assessment. The compliance assessment form which PAs used to predict an FHRS rating suggested potential sources of information which might be useful in arriving at a predicted rating (e.g. internal food hygiene audit reports, pest control reports), however in practice, the types of information used by each PA varied depending on the availability

¹¹ The NFFF is a trade association.

¹² A direct partnership is a partnership between one business and a local authority. A co-ordinated partnership is a partnership between groups of businesses via a co-ordinator (e.g. franchises and trade associations) and a local authority.

and format of that data. The food partnerships were also encouraged to share / use any additional information that they felt might be helpful in making an assessment.

2.8 Once information had been compiled and shared, PAs completed the compliance assessment form to predict a FHRs rating for the outlet and recommend whether they felt that an outlet would benefit from a physical inspection, or whether the business data suggested that compliance levels had been maintained. At the end of the form PAs also had the opportunity to offer evaluation information, including the time taken to complete the assessment, other information that they felt would have been useful in arriving at an assessment and their degree of confidence in their decision. PAs aimed to complete compliance assessments within 10 days of being notified that an outlet had been inspected. In total, the six participating PAs completed 313 compliance assessments during the pathfinder.

2.9 It must be noted that NIS will not necessarily use compliance assessments in the same way as the pathfinder if it is rolled out. Rather, the pathfinder sought to test a concept as to whether PAs can use business data to predict local level compliance and to learn lessons on how to make any future NIS for food a success.

Research objectives and methodology

2.10 An evaluation of the pathfinder was undertaken to establish how NIS could contribute to food regulation. Specifically, the evaluation sought to answer the following questions:

- Can PAs use businesses' own data to predict regulatory compliance at a local level?
- What needs to be done to make NIS a success for food partnerships?

2.11 The research consisted of three phases as shown in Figure 2.1.

Figure 2.1 : Research Approach



2.12 Twelve **face-to-face in-depth interviews were conducted with the PA partnerships** involved in the pathfinder; **six with PAs and six with businesses**. Given that the pathfinder was conducted on a relatively small-scale and in order to capture a rich level of detail from participants, a qualitative approach was considered most suitable for exploring how the pathfinder worked. The interviews with PA partnerships focused on:

- the perceived benefits and drawbacks of NIS;
- the experience of data sharing;
- the usefulness of information shared; and
- perceptions of what is needed to make NIS a success, including how any barriers can be overcome

2.13 **Nine in-depth telephone interviews were conducted with LAs and PAs not involved in the pathfinder**, in order to explore:

- wider perceptions among authorities who were less familiar with the NIS concept;
- the possible reactions of authorities who may be asked to reduce the frequency of inspections for some businesses if NIS is rolled out; and
- whether LAs feel they hold information of value to a PA in assessing an outlet's likely level of compliance and how easy it would be to provide this information.

2.14 FSA and IFF worked collaboratively to agree which LAs should be invited to participate – these were chosen to ensure that they covered a variety of types of LA including district councils, unitary authorities, metropolitan boroughs and a London borough. Participants were also selected to ensure they had differing levels of involvement with the ROF programme and Primary Authority, as it was felt this could affect their attitude towards the concept of NIS.

2.15 In addition to qualitative interviews with stakeholders, **investigations were conducted into variations between the FHRs ratings awarded through LA inspections and the FHRs ratings predicted in compliance assessments**, in order to identify the cause of these variations. This process involved comparing information collected in the compliance assessment forms with corresponding information from LA inspection materials (e.g. inspection reports, handwritten notes) for each food outlet where there was variation in the two ratings. Overall, 30 variations out of 62 in total were investigated. The variations which were included in the sample to be investigated were selected to ensure a spread by PA partnership and by LA as well as to include any variations with a difference of 2 ratings or more, or where one of the ratings (predicted or actual) was a FHRs rating of 3 or below. This was subject to the LA inspection results being available prior to this selection process.

2.16 As this piece of research was a relatively small-scale qualitative study, the views and experiences of those that participated in the NIS pathfinder should not necessarily be considered representative of the wider population of PA partnerships .

3 To what extent can primary authorities use business data to predict local level compliance?

3.1 This section of the report covers how FHRs ratings predicted by PAs compared to LA inspection ratings and how this varied by PA partnership. It also explores the reasons for variations in ratings given and offers suggestions as to how some of the issues encountered may be overcome. Finally, it reports how often PAs recommended that inspections should be carried out and how this interacts with predicted ratings given.

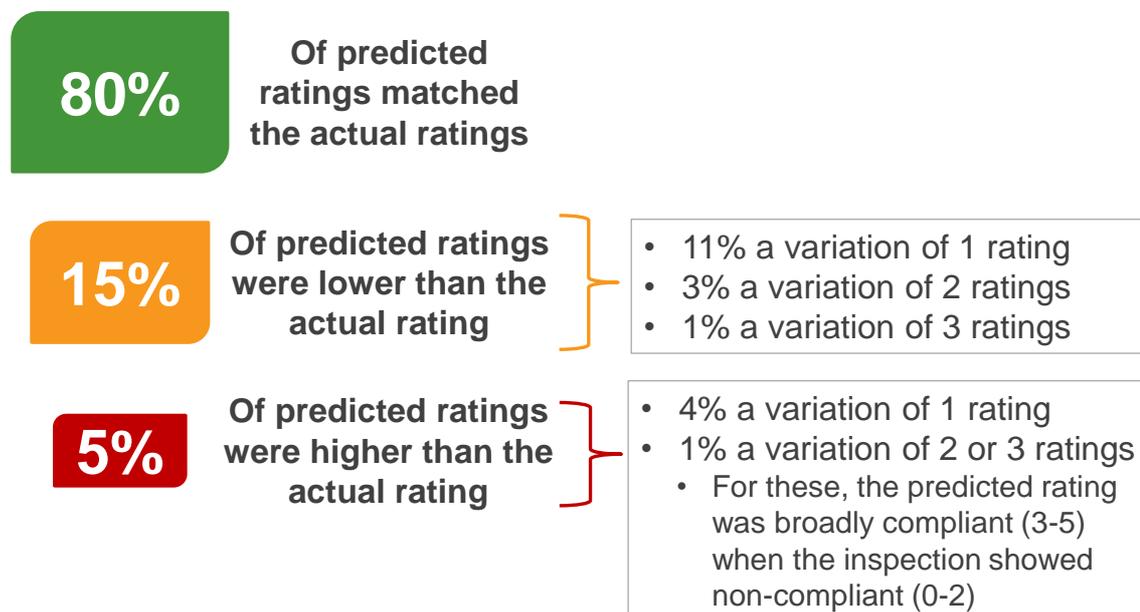
How Food Hygiene Rating Scheme ratings predicted by primary authorities compared to local authority inspection ratings

3.2 Comparing the FHRs ratings which PAs predicted through their compliance assessment with the corresponding ratings given in LA inspections can help determine the efficacy of using business data to predict local level compliance. The results in this section are based on 313 cases where both a predicted FHRs rating and actual FHRs rating (based on a physical inspection by the LA) were available.

3.3 In the majority of cases (80%), the predicted and actual FHRs ratings matched, showing that in this study, the PAs used the business data made available to them to predict local level compliance with reasonable levels of accuracy.

3.4 Looking in more detail at the 20% where the predicted and inspection ratings did not match, PAs' predicted FHRs ratings were lower than actual LA inspection ratings in 15% of cases, and higher in 5% of cases. However, the margins of variation tended to be small (as shown in Figure 3.1).

Figure 3.1 Incidence of variation between PA predicted FHRs ratings and actual FHRs ratings



3.5 The predicted FHRs ratings should not necessarily be assumed to be any less or more accurate than actual ratings awarded by the LAs.

3.6 Where predicted ratings were *lower* than inspection ratings, if it is assumed in these cases that the LA inspection rating is accurate (at that moment in time), this suggests that some food outlets could be recommended for inspection in cases where it may not actually be necessary to inspect.

3.7 Where predicted ratings were *higher* than inspection ratings, if it is assumed in these cases that the LA inspection rating is accurate (at that moment in time), the PAs appear to have overestimated the compliance of these food outlets based on the information used during their assessment in this study.

3.8 Of particular interest are those where the PA predicts a FHRs rating of 3-5, but the LA inspection has given a rating of 2. There were only 3 instances where the LA rated an establishment as 2 (no sites were rated as a 0 or 1); in all these instances, the PA rated the sites as a 3 or above. As part of this pathfinder, two of these variations were explored to understand why this

might have happened – and these instances are presented as case studies later in this chapter.¹³

3.9 There were 7 cases where the PA predicted a rating of 2 (no sites were predicted to be a 0 or 1), and the LA rated the premises as 3 or above. These cases are also of interest and are discussed further later on.

3.10 In general, where the actual rating was 5 (the vast majority of cases¹⁴), there was less likely to be any variation between this and the predicted rating, with the ratings matching in 85% of cases. Where the actual rating was 4, there was a match in only 38% of cases, with no matches between the compliance assessment and actual rating where the actual rating was a 3 or below¹⁵. Therefore during the pathfinder, using a business's own data to predict compliance was most successful for outlets with an FHRs rating of 5.

Reasons for variation between predicted and actual ratings

3.11 While a simple comparison of predicted FHRs ratings and those given through LA inspections gives some indication of the reliability and accuracy of using business data to predict local level compliance, analysing the reasons for any variations in these ratings is also important in terms of highlighting potential vulnerabilities in the NIS concept and in helping to determine how these might be overcome if the scheme is implemented more widely.

3.12 IFF Research was provided with the form completed for each compliance assessment sampled, as well as the corresponding LA inspection notes¹⁶ in order to investigate why variations may have occurred.

¹³ One variation not explored as the LA reports could not be obtained during the timeframe of this pathfinder.

¹⁴ 285 out of 313 assessments.

¹⁵ Although note low base sizes here: there were 21 assessments where the actual rating was a 4, four where the rating was a 3 and three where the rating was a 2. Appendix D shows the complete breakdown of actual and predicted FHRs ratings.

¹⁶ This included materials such as inspection reports, handwritten inspection forms and letters sent from local authorities to businesses with their inspection recommendations.

3.13 Some of the reasons for variation between LA ratings and PA predicted ratings feel somewhat inevitable and potentially more difficult to overcome.

These reasons included:

- Different interpretations of risk between officers (this is also true of the current inspection regime)
- Different moments in time being captured by compliance assessments and LA officer inspections during the pathfinder

3.14 Some reasons for variation feel easier to address, these included:

- PA caution affecting the accuracy of assessments. Caution may reduce with experience, as PAs become more familiar with business' compliance data
- PAs unaware whether food hygiene issues identified in LA historic inspection reports or in business information had been addressed during this study
- Lack of confidence in business data by PAs when the level of detail in this data was felt to be insufficient

3.15 Each of these reasons for variation is discussed in more detail below.

Differing interpretations of risk

3.16 In a few cases, LA inspection records/reports and business data revealed similar issues, however the LA officer and PA officer completing the compliance assessment had different views about the risk that these issues posed to food safety.

3.17 Difference of opinion such as this tended to result in only small variations in rating – for example, one of the components of the FHRs rating being given a 10 rather than a 5, pushing the overall FHRs rating one rating higher or lower.¹⁷

¹⁷ FHRs ratings are calculated using scores for three of the areas assessed at inspection: the level of compliance with food hygiene and safety procedures, the level of compliance with structural requirements and the level of confidence in management/control procedures. More information can be found in section 5.6 of the Food Law Code of Practice (2017): signin.riams.org/files/display_inline/45497/Food-Law-CoP-Eng-01032017.pdf

3.18 To put this in context, there is also some level of variation between different LA officers' assessments of similar issues within the current system of LA inspections. As part of the consistency framework, the FSA carries out national consistency exercises to help keep variations to a minimum. These consist of food business inspection scenarios which teams or individuals can work through to check that the FHRS rating they would award matches the result anticipated by the FSA. Out of 325 LAs in England which took part in the exercise in 2017, 61% returned a rating of 3 and 26% returned a rating of 4. The intended rating for this exercise scenario was 3, but rating of 4 was considered acceptable.

Differing moments in time

3.19 A more fundamental challenge in accessing and using business data is that the two approaches to monitoring compliance (physical inspection vs. compliance assessment) capture two different moments in time, which can ultimately lead to different perceptions of compliance. While PAs base their assessments on an accumulation of data over time, LA officer inspections provide a snapshot of an outlet's performance at that moment in time. This was by far the most common cause of variation between predicted and actual ratings, including two instances where the PA predicted an FHRS rating of 3 or above, and the LA rated the site as a 2 (see pp.24-25).

3.20 This had varying consequences in the pathfinder: in some cases, the business data revealed issues not evident at the time of inspection, while in other cases, LA inspections picked up new issues that the PA was not yet aware of.

3.21 In terms of the nature of the variations where different moments in time had an influence, there was a relatively even split between predicted ratings being higher than actual ratings and predicted ratings being lower than actual ratings. Most of these variations differed by one FHRS rating, while some varied by 2 or 3.

PA caution affecting the accuracy of assessments

3.22 During the pathfinder, some PAs appeared to err on the side of caution when using business data as they were not confident about giving a high rating without seeing the inspected site themselves. This issue was often exacerbated in cases where some desired information was unavailable. Cautiousness in these cases typically led to PAs interpreting issues to be more severe than they perhaps were in reality.

“I think on some occasions I’ve been more cautious, and I’ve probably given them a lower score than they actually probably deserve...but that is only because we’ve not had access to the latest inspection report”

Primary authority

3.23 Furthermore, cautiousness could creep into assessments when using internal business audit data because some business audits assess outlets on their own internal standards, which may go above and beyond the level required for legal compliance and cover aspects other than food safety.

3.24 It must be acknowledged that PA caution could sometimes have led to a match between predicted ratings and those awarded through inspections (i.e. the PA would have rated a particular outlet higher than the inspection rating if it had not been for their caution bringing the predicted rating down).

To ensure consistency of approach – and so that businesses are not unfairly penalised – PAs should be encouraged to focus solely on contraventions to legislation rather than breaches of internal standards when considering compliance using business’ own data.

PAs unaware whether previous issues had been addressed

3.25 Variation also occurred in cases where PAs had been provided with information showing there had been a compliance issue at the outlet being assessed but had not been given any accompanying evidence showing that these issues had been addressed. Because PAs could not be sure in these

cases that the necessary action had been taken, they tended to be more cautious in their scoring, even if the other evidence available suggested the business was compliant. This type of challenge is unique to compliance assessments using business data, in that LA officers, by contrast, would likely be able to see for themselves during an inspection whether action had been taken to address an issue.

“I’d scored some of the sites as a four because works were required, I don’t know, last month or the month previous to that. They could have been done, signed off, the officer could have gone in and said that’s absolutely fine, but because we didn’t have that latest part of the jigsaw, I’ve had to play on the cautious side.”

Primary authority

Knowing whether historical issues have been addressed leads to a higher level of confidence amongst PAs making assessments. Where it is not possible to formally gather data on whether actions have been addressed, PAs could seek confirmation from the business (they did not do so in the pathfinder, feeling it went against the spirit of testing whether business data could be used to predict local level compliance).

Lack of confidence in business data when level of detail felt to be insufficient

3.26 In one instance, the PA received a business internal audit report including the business’s own predicted FHRS rating but consciously rated the outlet higher than the business as they felt the information included in the business audit did not justify the rating given. Had the PA used the business audit rating, the variation between the PA predicted rating and the LA inspection rating would not have occurred.

3.27 While the PA was correct in applying their own interpretation, and making their assessment based on the information provided, this example shows the confusion that potential omission of information can cause. It is possible that the business’ predicted rating was an accurate reflection of the outlet’s compliance levels, yet because the content of the audit information provided

did not support the rating, the PA lacked confidence in using the internal audit rating:

“I would consider the issues identified under 'Structure' to constitute 'minor non compliance' and result in a component score of 5. This however differs from the likely third party audit component score of 10 for 'Structure'. Given the information provided in the audit I was not able to identify why the auditor considered the matters identified would result in 'some non compliance' with respect to food safety”

Primary authority

The issue highlights the need for business data / reporting to have a sufficient level of detail to give PAs confidence that they can make a reasonable judgement as to local level compliance without conducting an inspection of premises. It also suggests that the final approach taken to national inspection strategies will need an ongoing dialogue between PAs and businesses to resolve uncertainties.

Reasons for variations of particular interest

3.28 As discussed earlier, instances where the PA predicts a FHRS rating of 3-5, but the LA inspection has given a rating of 2, are of particular interest given that there is a risk that the PA has over-estimated the compliance of the food outlet in these cases. The reasons for variation in the two instances available for analysis are presented as case studies here:

Case Study A: PA predicted rating 3, LA awarded rating 2

This variation was driven by different hygiene scores, with the LA awarding a hygiene score of 15 and the PA predicting a hygiene score of 10. This small difference was driven by the LA inspection identifying temperature control issues at the food outlet which had been followed up after a customer complaint. Although the internal audit information used by the PA mentioned issues around monitoring temperature control, there were no reported contraventions in the actual temperature levels. This suggests that the variation was caused by changing circumstances at different moments in time. However, it should also be noted that this PA was not analysing complaints data as part of its compliance assessments (due to the high volume and perceived low value *in general* of such data) and it is *possible* that had the PA had access to the complaint in question here, it may have meant the PA scoring the outlet lower and no variation in scoring being observed.¹⁸

Case Study B: PA predicted rating 5, LA awarded rating 2

This variation was driven by different structural scores, with the LA awarding a structural score of 15 and the PA predicting a structural score of 5. The LA rating appeared to be driven by pest control issues (droppings) and poor cleaning, however the PA assessment reported that pest control reports were not made available to them (pest control records are held electronically by a third party, but they were unable to readily provide details of any outstanding actions for the relevant stores as part of this short pathfinder). The PA therefore felt there was 'insufficient

¹⁸ As reactive local authority work falls outside the scope of inspection plans and therefore national inspection strategies, consumer complaints such as this will always be within the remit of local authorities to investigate – reactive work is never restricted by a NIS.

information to make an assessment' using this particular element of the assessment form, despite the PA being confident about making an assessment more generally.

While audit arrangements specified that pest control actions would have appeared on the audit report if they had not been carried out, reports from pest control visits (which typically take place more frequently than internal audits) would have provided more certainty for the PA, one way or the other.

If a pest report had been available which identified pest activity, this could have influenced the PA's decision.

Timeliness of pest information feels the critical factor here (whether that pest information is from pest reports or an internal audit, but noting again that pest reports are generally delivered more frequently).

3.29 In addition to the cases where there was a risk that PAs over-estimated compliance, there were also seven cases - all for the same food partnership - where the opposite was true: the PA predicted a rating of 2, while the LA in each case awarded a broadly compliant FHRs rating of 3 or higher. Five of these seven cases were analysed as part of the research.

PA predicted a rating of 2, LA awarded rating of 3 or higher

3.30 A common theme that emerged in most of these cases was the PA assessment identifying temperature control contraventions via the business internal audit report which were deemed 'critical to food safety', but these issues not being reported (or only minor contraventions mentioned) in the LA inspection. In some cases, temperature control issues were mentioned in more than one audit report for the same food outlet. While the variations between the rating may have occurred because the PA assessment and LA inspection ratings reflect different moments in time, it appears that the

volume, and cumulative nature of the information provided in the business audit may give a broader view of compliance than an LA inspection would.

3.31 It is also noteworthy that in some of these cases, PA assessments reported that contraventions were immediately addressed by management following the business audit, yet these issues still appeared to drive the negative rating predicted by the PA. This suggests greater clarity may be needed over how to deal with historical non-compliance when issues have since been addressed.

How often primary authorities recommended that a local authority inspection be carried out

3.32 In a quarter of all compliance assessments, the PA predicted an FHS rating of 4 or 5 but still recommended an inspection be carried out. This was the case for:

- 22% of those with a predicted rating of 5
- 50% of those with a predicted rating of 4

3.33 It was also the case that for all outlets given a predicted rating of 3 or less, an inspection was recommended by the PA.

3.34 Therefore, even where there are perceived to be high levels of compliance, PAs could still recommend inspections relatively often. However, this could still be a substantial decrease in inspections carried out compared to the current system.

3.35 Typically, PAs recommended inspections despite high predicted ratings where they were unable to establish whether non-compliance previously identified by the business had been addressed. Although the purpose of this pathfinder was to test the use of business data rather than to test a model for NIS, this suggests the need for data used by PAs to include confirmation of whether issues have been addressed and, for there to be PA oversight of how the business identifies and rectifies non-compliance.

4 Enablers for success

4.1 To make NIS a success, stakeholder hopes and concerns in three areas need to be considered:

- Data accessibility
- The rationale for the scheme
- Public safety and trust

4.2 Each is discussed in further detail below.

Data accessibility

4.3 This section of the report details the information used by PAs to complete compliance assessments, the challenges they had in obtaining and using this information and the challenges businesses faced in providing it. It also covers the important role LA data could play in helping PAs to determine local level compliance and the challenges to sharing this data.

4.4 PAs used a wide variety of information to conduct compliance assessments during the NIS pathfinder. The most common types of information used were:

- Business audit reports.
- Pest control reports, and
- Historical LA officer inspection reports (at least the summaries, and component parts of FHRS ratings),

4.5 PAs typically used the two most recent versions of each of these information sources, as suggested by the FSA. In all cases, pest control reports were produced by a contractor and business audits were generally, though not exclusively, conducted in-house.

4.6 Other types of information used to conduct compliance assessments included:

- Micro-sampling data;
- Complaints data;
- Staff training records;
- Maintenance records; and
- LA officer investigation reports.

4.7 The quantity of information used by PAs varied from one PA partnership to another. In a couple of cases, only two or three pieces of information were used but more commonly, six or seven different types of information were drawn upon.

4.8 Most PAs felt that they had a sufficient quantity and quality of information to complete a compliance assessment and be confident in the outcome although sometimes this confidence was in their decision as to whether or not an inspection was required rather than in the predicted FHRS rating given.

4.9 Business audit reports were considered particularly useful, giving a comprehensive and transparent view of a business' food hygiene practices. Some PAs commented that business audit reports went above and beyond the detail of an LA officer inspection report.

4.10 In a few cases, the quantity and quality of information provided brought challenges to making assessments. In terms of the quantity provided, some PAs felt they had too little information to conduct a compliance assessment with confidence during this study. This was often because the information provided by businesses did not paint a full picture of the premises' food hygiene practices. For example, one PA commented that they had records of fridge alarms but had no information about why these alarms had gone off. Another PA received a pest control report that flagged an issue in their

partner business' premises but they did not have any information about whether the issue was resolved.

"We know that the internal auditors are chasing that up but there are no documents that relate to it. So, it would be useful to have some more information about, 'This issue was raised, three weeks later it was dealt with'."

Primary authority

- 4.11 Businesses were sometimes unable to provide certain types of information as they did not hold it in a format useful to the PA during this study. For example, one PA was not provided with micro-sampling data because the partner business only held this type of data on a product-by-product basis rather than at outlet level.
- 4.12 In a few cases, partner businesses chose to not provide PAs with specific types of information that they had available because it was perceived to be too time consuming to compile and share during the short duration of the pathfinder. For example, one PA could not obtain pest control reports for all their partner business' outlets because many were not available in a digital format and would take a long time to compile and share. As reported in Chapter 3, in one instance pest control records were held electronically by a third party, but they were unable to readily provide details of any outstanding actions for the relevant sites. The inability to access pest control reports for a site may have contributed to a variation between the awarded FHRS rating and the predicted rating. The inspecting LA officer awarded an FHRS rating of 2 primarily due to pest control issues at the site, however the PA was not aware of these issues before the LA inspection and so predicted a rating of 5.
- 4.13 On the other hand, some PAs felt that businesses provided them with too much information as it took a considerable amount of time to analyse. Complaints data and pest control reports were flagged by some PAs as examples of this, with the former typically being provided in the form of large data files and the latter often in the form of a long report. A few PAs

emphasised that the information would have been easier to use if summaries were provided.

“I think we probably got more information than we needed to, compared to an officer going in at site level. They may only see a summary of say, a pest control report, whereas we had access to a full report, which could be ten pages long.”

Primary authority

4.14 Where PAs felt that they had too much customer complaints data, some took the decision not to use it when making their assessment (although this was to do with a lack of perceived value in this data – as further discussed below – not just due to its high volume).

4.15 In terms of the quality of the information provided by businesses, some PAs mentioned that there were mixed messages in the information they were provided. For example, issues were sometimes raised in historic LA officer inspection reports that were not raised in business audit reports and vice versa. This made it difficult for PAs to reconcile the two sources. In some cases, types of information available to PAs were not used because they were considered less helpful in assessing food hygiene compliance. This was particularly true of complaints data, which often contained information which was considered irrelevant when making assessments (e.g. related to food quality rather than food hygiene).

4.16 As discussed in Chapter 3, there was one instance where complaints data was not used in the compliance assessment, where – had it been available – it could have meant the PA giving a rating of 2 (in line with the rating awarded by the LA) rather than a 3 (which may have over-estimated the business’s compliance). The value, on occasion, of complaints data as suggested here must be weighted against the time needed to analyse high volumes of such data.

4.17 Some PAs and businesses were concerned about the confidentiality of commercially sensitive information and the perceived risk that information

could become accessible to the media or public through Freedom of Information (FOI) requests or data leaks and that the information may be misinterpreted. This prospect was very concerning for businesses, who rely on their reputation for custom. It was suggested that data sharing agreements between the two parties would help to alleviate concerns.

"We know anything in the realms of food safety can be quite emotive if it gets into the wrong hands. So I think the context of information is probably my concern... information is very easy to misinterpret... things get sensationalised out of all proportion"

Food business

4.18 There was a consensus among LAs that the information they hold about food premises is of vital importance to NIS being a success if implemented on a wider scale. This was because LAs considered LA officer inspection reports and information regarding enforcement history to represent an independent assessment of food hygiene compliance. Moreover, they felt that their local knowledge played an important role in contextualising information for an effective risk-based approach.

"Without that information, I don't know how you're going to determine whether or not a business can be part of a national inspection strategy."

Local authority

4.19 Types of local knowledge held by LAs that were highlighted as especially valuable included an understanding of the local community (e.g. local events that put pressure on food businesses), an awareness of the characteristics of businesses (e.g. changes in management) and the premises they occupy (e.g. whether prone to flooding, of listed status or off the main water supply).¹⁹

¹⁹ PAs should have access to information about the characteristics of business and the premises they occupy

4.20 Furthermore, some LAs emphasised that through their other regulatory functions (e.g. health and safety, trading standards, licensing), they could build a fuller picture of whether a business is generally compliant with regulatory standards.

4.21 Although LAs expressed that the information that they hold about food premises would be of vital importance to the NIS, many felt that it would be difficult for them to share such information with PAs on a regular basis. This was primarily because it was assumed that the task of sharing information regularly with PAs would strain limited internal resources by adding to the workloads of LA staff and increasing costs. Moreover, some held concerns about whether adequate data security measures were in place for information to be transferred between LAs and PAs.

“We haven’t got enough resource to do our basic bread and butter work that we need to do, let alone share our database with the primary authorities ... it would probably be quicker to go and do the visit.”

Local authority

4.22 However, some LAs were more positive about data sharing and reported that they already share data with PAs when issues arise.

To ensure that PAs are provided with information that is useful for compliance assessments it is recommended that the FSA:

- Set minimum standards on the quantity and quality of business information PAs use to conduct compliance assessments;
- Issue guidance on when it is acceptable for PAs to request further information from LAs and when they should be encouraged to do so; and
- Address concerns held by businesses, PAs and LAs about the data security of information transfers.

Promoting the rationale of national inspection strategies to stakeholders

4.23 This section of the report outlines to what extent PAs, LAs and food businesses have 'bought in' to the concept of NIS and to what extent they still need the rationale to be promoted. This includes exploring elements where stakeholders see positives in the concept and where they still need convincing i.e. where there are challenges to overcome in the implementation of NIS.

Potential positive impacts

4.24 Most stakeholders could see the value of NIS if they free up the resources of enforcing authorities, enabling them to focus on businesses which are more likely to be non-compliant and which therefore pose a greater risk to public health.

"It would be a benefit to us that we wouldn't have to inspect them.... it gives us more time to focus on premises which are more of a problem"

Primary authority²⁰

4.25 This was considered especially important given resourcing issues among LAs, particularly smaller ones.

4.26 Businesses welcomed the prospect of less frequent inspections from LAs as they felt that fewer interruptions would allow them to manage their own compliance more effectively.

4.27 Some businesses also suggested that having the same authority making every assessment would lead to increased consistency in the application of food hygiene regulation across all outlets of their business.

²⁰ This primary authority was thinking here in its role as an inspecting (enforcing) authority.

"We know our internal data is consistent, and if it's going to one authority who's assessing, then you've got a consistent approach to everything that we send. Whereas currently, it's really inconsistent."

Food business

What value can it add?

4.28 The current system of food hygiene regulation already uses a risk-based approach towards food hygiene inspections and a few stakeholders therefore felt NIS would add little extra value. For instance, under the current system, many food outlets that have been given a FHS rating of 5 are already inspected at intervals of every 2 years, and some low-risk business are subject to alternative enforcement strategies which do not involve any visits at all, rather compliance is assessed through completion of a questionnaire. For partnerships with very high proportions of outlets with a FHS rating of 5²¹, for whom NIS may well be intended, the introduction of NIS may therefore have little impact.

4.29 However, some stakeholders reflected on the fact that NIS builds on the risk-based approach of the current system in positive terms. For these stakeholders, NIS are a natural progression of PA partnerships – an extension of the rationale of inspection plans – and they felt that the success of NIS could reinforce the value of these partnerships.

Which businesses are national inspection strategies suitable for?

4.30 Some stakeholders highlighted that the scheme's effectiveness in freeing up LA resource will be totally dependent on the degree of uptake. For instance, it is unlikely to have a big impact on a LA where only a few sites in that particular area are part of a NIS (which was felt to be more likely in small rural LAs).

²¹ One PA mentioned that this was the case for over 95% of their business partner's outlets.

4.31 Uptake of NIS could be affected by business and PA enthusiasm for the concept as well as by which types of PA partnerships are eligible to implement one. Most stakeholders felt that not all businesses would be suitable for a NIS, however having restrictive eligibility criteria would mean that the scheme could have little impact.

4.32 Many felt the scheme should only be used for 'low-risk' businesses, although there were different views as to what 'low-risk' means. For some, supermarkets could be considered high-risk because of the breadth of food activities they cover, while others felt that their size made them better equipped to regulate themselves.

4.33 Operation of NIS may be more challenging for membership organisations and their members. The coordinated partnership in the pathfinder struggled to complete many compliance assessments, having found it hard to obtain information from its members. In this case, the process of notifying the membership organisation that an inspection had taken place and sending over the relevant materials was too time consuming and costly for owner managed businesses. The PA involved in this partnership also commented that it may be harder to sell the advantages of NIS to the micro businesses that are part of membership organisations.

Will NIS save time, which can then be used to focus on high-risk businesses?

4.34 NIS must save inspecting authorities time on their assessments of compliant businesses if it will enable them to use this saved time to pay more attention to businesses which are more likely to be non-compliant and to new businesses.

4.35 There was a strong consensus among PAs that the workload involved in completing compliance assessments was challenging during the pathfinder and these challenges arose for a variety of reasons:

- Workload requirements typically fell to one or two individuals in PAs or businesses, meaning there was little resilience if there was absence or a change in staff.

- The irregular nature of LA officer inspections meant that there could be a sudden influx of work for those individuals, making it difficult to meet the target 10-day turnaround that this pathfinder required.
- This was sometimes exacerbated by the working structures in PAs; part-time work could make it difficult for pathfinder participants to juggle completing compliance assessments with other responsibilities.

4.36 Although NIS would not necessarily operate in the same way as in the pathfinder if formally introduced, these workload challenges made some PAs question whether NIS would deliver tangible resourcing benefits.

4.37 The average time taken to fill in a compliance assessment was 77 minutes, but this ranged widely, from 20 minutes to 5 hours. The time taken to complete compliance assessments decreased over the course of the pathfinder as PAs become more familiar with the process.

4.38 A few PAs perceived there to be no net benefit in terms of resourcing if work is simply redistributed from LAs to PAs (although travel time saved).

“It’s almost like we’re doing the inspection for the local authority, so where is the saving? Somebody was going out and doing an hour and a half inspection, but now we’re doing an hour and a half desktop.”

Primary authority

4.39 It was also mentioned that there could be a net increase in work (and associated costs) for PAs if they are expected to take on more work while LAs continue to do the same amount of work, but focused towards higher-risk businesses. Although one of the principles of the ROF is that *businesses should meet the costs of regulation*, this message does not appear to have been widely taken on board.

The local authority view

4.40 Some LAs were concerned about the potential impact of reducing workloads for EHOs. A few LAs felt that NIS could receive a negative reaction from LAs

if it is viewed as a reduction of their responsibilities and power; they felt that some LAs may show resistance if asked to reduce inspections to certain businesses who have NIS in place. There were also concerns that PA partnerships had already made businesses more reluctant to engage with LA officers, and that NIS would exacerbate this situation.

4.41 Some LAs were concerned that NIS could lead to food hygiene being monopolised by larger LAs in food partnerships who want to elevate their status and establish control beyond their local authority area, ultimately leading to cuts to staff in smaller LAs not part of a food partnership.

"If they say, 'you don't have to inspect as many [food outlets]' and we went down to x number of inspections, there's justification in saying, 'well, I'll lose 50% of my resource for food safety'."

Local authority

It is recommended that in order to promote the rationale of NIS to stakeholders, the FSA:

- Communicate the potential of NIS to reduce the frequency of LA inspections at the most compliant food businesses who have FSA recognised NIS in place, and the advantages this would have for PAs, LAs and businesses;
- Explain how NIS will be different from the current system;
- Continue to consider the likely workload NIS creates for all involved parties (i.e. the FSA, PAs, LAs, businesses) with the aim of protecting public health with the least burden on limited resources; and
- Address the concerns held by LAs about the perceived possibility of staff cuts and the loss of powers and responsibilities.

Public safety and trust are paramount

4.42 This section of the report considers how NIS might interact with the current FHRs regime and the importance of getting this right in terms of public perception, which is critical for stakeholder reputations. It also explores why some stakeholders were concerned that NIS could increase the risk to public health and reports views on the level of oversight which will be required to counter this perceived risk.

Integration into the current FHRs system and impact on public perception

4.43 Stakeholders are very keen that the public trusts the food hygiene rating system, seeing it as critical for reputations (particularly of businesses), with the current FHRs scoring system felt to be well known and trusted by the public.

"The general consensus amongst customers seems to be, if you haven't got a sticker on the door then you must be less than a three rating, or you're certainly not a four or five. They look for those ratings."

Local authority

4.44 FHRs ratings can determine whether a food outlet receives someone's custom and businesses therefore have a financial imperative to strive to achieve the best possible ratings. These ratings also contribute to general brand reputation and are a source of pride for local staff and the business as a whole. Businesses are therefore unlikely to support any system which results in a lowering of ratings.

4.45 Reputation is also key for PAs and LAs, who take considerable pride in their work as inspecting bodies. As well as seeking to maintain public backing, they want to be seen to do a good job for anything they are 'signing off' or for which they are taking responsibility.

The importance of FHRs ratings means careful consideration should be given to how NIS is integrated into the current system. The primary consideration is whether assessments using business data will result in FHRs scores being awarded, or whether LA inspections (potentially taking place at a reduced frequency) will continue to drive scores. Whatever the outcome, there was a consensus amongst respondents that a rating for each outlet is needed.

4.46 Some stakeholders feared that a reduction in the frequency of inspections could lead to reduced consumer confidence in food hygiene regulation. Some suggested the public are unaware of the current variation in length of time between inspections, and the practice of certain compliant businesses being subject to alternative enforcement strategies to demonstrate compliance in place of regular LA inspections. Some stakeholders felt that the public would be unhappy if they knew about this, and would feel similarly about any reduction in inspection frequency determined via a NIS. There was concern that this perceived ‘reduction in service’ may lead to questions over standards, similar to recent headlines²² about the reduction in Ofsted inspections for ‘outstanding’ schools.

“I don’t think the public particularly would be wanting it, because in their eyes, it’s less inspections, and less control”

Local authority

4.47 Stakeholders were sceptical about how the public would respond to businesses becoming more involved in regulation, and discussions with LAs found that some may not ‘buy in’ to the concept. Some LAs expressed concern about the increasingly close partnerships between businesses and PAs, and how this would be perceived by the public. They questioned whether the perceived ‘cosying up’ of the public and private sector in food partnerships is serving business interests over those of the public. These

²² www.bbc.co.uk/news/education-44227869 (24th May 2018); www.theguardian.com/education/2018/may/24/ofsted-not-inspected-hundreds-schools-decade-report (24th May 2018)

close relationships, where one or two individuals are often responsible for the majority of the work on either side, also prompted unease around the sense that businesses are almost 'marking their own homework'.

"Sometimes I think the officers feel the primary authority officers are almost working for the business rather than us and sometimes I think there is a bit of a view that they might have a bit of a vested interest"

Local authority

4.48 LAs felt they had an integral role to play in countering this perceived 'cosying up' in the new system, by providing independent verification of food hygiene for those implementing a NIS. One LA suggested that the PA assessment should be advisory, leaving LAs with the final decision on when, and how frequently, they should inspect food outlets. In this approach, business data would be used as additional intelligence rather than replacing inspections. In general, there was a feeling that some sort of independent auditor is necessary in the regulatory process. The FSA was seen by many as the natural choice to perform this role as discussed further below.

Stakeholder concerns

4.49 There were fears that implementing a NIS may make the current inspection regime less robust. These concerns were common among LAs but were also expressed by some primary authorities and businesses. LAs were particularly apprehensive about the potential for complacency among businesses if they know they will not be inspected as frequently.

"If the burden of regulation, if you want to call it that, is lifted somewhat, so, inspection frequencies are less, in some instances that might encourage complacency, and inadvertent noncompliance through complacency."

Local authority

4.50 Businesses refute the suggestion of potential complacency, however, citing their need for high standards in order to protect their reputation.

4.51 A few LAs expressed concerns about whether businesses will be fully transparent in the data they provide as part of the NIS, either because they want to achieve a good FHRs rating to maintain / enhance their reputation or because of staff rewards or bonuses for compliance. This may present a conflict of interest if it incentivises businesses to present themselves in a positive light.

“They’ll present things in a slightly different reflection than we would view them as a local authority. It’s how do you get that balanced or independent view?”

Local authority

4.52 LAs were also sceptical about national business policies translating reliably to local action. Some recalled experiences of inspecting local outlets of large businesses, and finding non-compliance, sometimes repeatedly, despite the business having a high overall compliance rate. There was a fear that these outlets may slip under the radar if the business had a NIS, and pose a risk to public safety²³.

“Although the company have got systems, policies and procedures in place that are universal and uniform, they don’t necessarily get implemented at local level by the local management.”

Local authority

Given LAs’ strong opinions about NIS potentially undermining the current inspection regime and concerns over public confidence in FHRs ratings being affected as a result, the FSA will have to work meaningfully with LAs in order to achieve their understanding and support for the process.

²³ Although these fears may be allayed if it was communicated that for businesses with a NIS, decisions to inspect or not would still be made based on the compliance history of each outlet.

4.53 Some LAs and a few PAs felt that relying on the accumulation of data rather than the 'snapshot' view from an inspection could present risks to public health, with this difference in approach a key driver of variation in predicted and actual ratings in the pathfinder. It was felt that using business data could pose a risk to public health if non-compliant businesses were to be inspected less frequently than necessary and cause food hygiene issues to go unnoticed. Whilst some LAs and PAs felt using business data would provide a more fully-rounded and robust picture of compliance, others felt it was superficial, and inferior to conducting an in-person inspection:

"That day could be a perfect day for a business, or it could be the day that somebody's not turned up to work... it may be an abnormal day, but, you're capturing a moment in time and making a judgement call on that. What we're doing as part of this role, in this pilot, is we're using accumulative information that is trending about that particular store, which that EHO or Trading Standards Officer would not have access to. So, what you're making is an interpretation based on a lot more information, other than a subjective visit."

Primary authority

"Even though it's only a snapshot in time, we base our inspections and our ratings on that snapshot in time, and if you're taking that away and predicting a score, I just think it's very superficial."

Local authority

"LA inspections, you're actually there in the store. You've seen it live, as to what's happening. You can discuss things with staff and talk to them, and you can get a better feel for it there and then, whereas with the desktop audit you are just going off paperwork."

Primary authority

4.54 In practice, a lack of confidence in business data compared to LA inspections tended to lead to a more cautious approach by PAs - who sometimes gave

an instruction to inspect when this perhaps was not needed. However, LAs may need some convincing of this.

Importance of oversight

4.55 Many PAs, LAs and food businesses said that, in order for NIS to be a success, some form of oversight is required, to ensure that relationships between PAs and businesses are operating as they should be, and that primary authority assessments are accurate, thereby encouraging trust in the scheme. There were concerns from some that if left to their own devices, PAs could make inaccurate assessments and businesses could find ways to exploit the system.

4.56 Many stakeholders felt there was a need for the FSA to set eligibility criteria for implementing a NIS, to ensure that PAs have the necessary competencies and training and that businesses meet the required compliance standards. A large number believed that a NIS would not be suitable for all businesses and that an agreed set of standards would be the best way to ensure only suitable businesses became part of the scheme.

4.57 One suggestion was that there should be minimum standards for business audits, as these often formed a critical part of PAs' assessment of an outlet's compliance level. This could include a requirement for audits to be conducted by a third-party and/or for auditors to hold a certain qualification level (e.g. be qualified EHOs) to ensure consistency across businesses.

4.58 Some suggestions for ongoing monitoring included compulsory inspections if there is a change in management within a food outlet, and ensuring that a random sample of PA assessments (e.g. 10%) are checked to ensure predicted ratings and decisions on whether to inspect are correct²⁴.

²⁴ This latter example assumes that NIS would work in practice in a similar way to in the pathfinder.

4.59 There was no consensus from stakeholders over exactly how eligibility and ongoing oversight should work, but FSA was seen as the natural choice for setting parameters and having responsibility for ongoing assurance.

4.60 The FSA is currently developing criteria that PA partnerships would need to meet to operate a NIS for food hygiene and/or food standards, and guidance on how partnerships can meet them.²⁵ In addition, the FSA is developing an assurance model that will determine how the FSA will assess NIS proposals and what oversight the FSA will have of PA partnerships operating a NIS.²⁶

²⁵ Primary Authority National Inspection Strategy Draft Criteria and Guidance (FSA, 2018): www.food.gov.uk/sites/default/files/media/document/PA%20NIS%20Draft%20Guidance%20on%20NIS%20Criteria.pdf

²⁶ Primary Authority National Inspection Strategy – Assurance Model (FSA, 2018): www.food.gov.uk/sites/default/files/media/document/PA%20NIS%20Assurance%20Model%20options%20paper.pdf

5 Conclusions and recommendations

Conclusions

- 5.1 The NIS pathfinder shows that PAs can use business data to predict local level compliance to a reasonably high degree of accuracy, however stakeholders raised a significant number of concerns and considerations that would need to be addressed before NIS was implemented for multi-site food businesses.
- 5.2 On the core question of data sharing, there were a number of practical concerns from all stakeholders around sourcing, sharing and protecting data. In particular:
- some data was felt to be too time-consuming to compile and share during the short duration of this pathfinder. Although NIS would not operate in the same way as it did in the pathfinder if formally introduced, there is a balance that needs to be struck between data being detailed enough but not overwhelming in volume, and for data held by businesses to be in an easily accessible format;
 - data security was felt to be of critical importance to all PA partnerships and this needs to be addressed for businesses to want to take part in the scheme.
- 5.3 There were also a number of questions raised around how a NIS would be perceived by stakeholders and the general public. The rationale for a NIS therefore needs to be clearly defined, especially for LAs, who may see this concept as detracting from their role. How the public views NIS feels critical in order to achieve stakeholder buy-in, with stakeholders keen to maintain public trust in the food safety system. Underpinning this, some worry that public health could be put at risk if businesses become complacent under the new system and their outlets were inspected less frequently.
- 5.4 Although most stakeholders considered NIS to be broadly feasible, they often added caveats to this view. These usually involved some stipulations about

the type of businesses that should be involved, and the need for sufficient oversight. Therefore, eligibility criteria and ongoing monitoring will be important, with the FSA felt to be the most natural choice for this role.

Recommendations

- **A level of consistency is needed to maintain faith and credibility in the system.** This could be in the form of standards in how a NIS is implemented and assessed, as well as minimum competencies for PAs. This is something the FSA is currently developing. In addition, there is a need to ensure a set of common standards are applied to internal or third-party audits, given the importance of these in informing the assessments. However, these ideas may conflict with the concept of each food partnership implementing a tailored NIS.
- **Eligibility criteria should be in place to vet which food partnerships can implement a NIS.** Businesses need to have a proven track record of being compliant, however that is defined. This is something the FSA is currently developing.
- **NIS may be more challenging for membership organisations.** This could be tested by further exploratory work.
- **Businesses will need to be reassured about the extent to which their data will be made openly available (e.g. via FOI requests).** This is critical to getting their buy-in.
- **A way of recording and sharing whether non-compliances with food safety requirements picked up by internal, second and third-party audits have been addressed would increase PAs' faith in business data.** It should also be assumed that some ongoing dialogue between businesses and PAs will be necessary to bridge any gaps in information.
- **A comprehensive communications strategy is needed to further involve stakeholders in how the scheme may work, and to allay their concerns.**
- **The FSA will need to be mindful of the resourcing and practical challenges of accessing and sharing data (for all stakeholders).** This is to

ensure information requirements are feasible and not too labour intensive.

One suggestion would be to have a list of information that would ideally be provided, and if businesses are unable or unwilling to provide anything from the list, they would need to state a reason for the NIS to be recognised by the FSA.

- **There is a need to define how NIS will interact with FHRs, as ratings are currently generated by LA inspections.** This is something that the FSA is considering.
- **LAs (not in food partnerships) should be involved in NIS.** Their local knowledge was considered an important source of information, and could possibly facilitate a triangulation of data which would lend integrity to the system. In addition, their involvement may ease fears that NIS could be a threat to their jobs. From a practical perspective, they could provide some sort of independent overview to the process to reassure the public of the scheme's integrity, although some mentioned this role would be better suited to the FSA.
- **Some degree of public consultation may be required, and the FSA should consider how the changes could be communicated to the public.** Strong eligibility criteria and oversight are likely to be part of this message, which will need to reassure the public of continued food safety. This is something the FSA is currently working on.

6 Acknowledgements

IFF Research would like to thank the Food Standards Agency for their support and advice throughout the pathfinder evaluation. We would also like to thank everyone that gave up their time to share their experiences and views of NIS.

7 Glossary

FHRS - Food Hygiene Rating Scheme

LA - Local Authority

NIS - National Inspection Strategy

PA - Primary Authority

ROF - Regulating Our Future programme

8 Appendices

Appendix A: Primary authority topic guide

A Introduction (5 mins)

Introduction by the researcher:

- My name is [NAME] and I work for IFF Research, an independent research company, that has been commissioned by the Food Standards Agency to evaluate the National Inspection Strategies pilot. As you'll know, the pilot is testing how NIS works as a concept, in particular whether PAs can use business data to predict local level compliance. We are speaking to Primary Authorities that are taking part in the pilot to explore how you've found the process of accessing and using business data so far and how confident you've felt in making assessments based on this data. We will also be talking to businesses about how they've found the process.
- IFF Research is an independent market research company, operating under the strict guidelines of the Market Research Society's Code of Conduct. This means that anything you tell us will be treated in the strictest confidence, and none of your answers will be attributed to you or the organisation you work for during reporting.
- The interview will last around 45-60 minutes.
- REQUEST PERMISSION TO RECORD – It's just so that we don't have to rely solely on taking notes. The recording will not be shared with the FSA.

B Background on respondent/PA (5 mins)

I'd like to start off just by getting some background on you and your Local Authority...

First of all, could you tell me a bit more about your job as an individual officer within the Local Authority?

How many food partnerships do [you/NAME OF LA] act as a Primary Authority for?

PROBES:

- Can you tell me a little bit about these partnerships?
- How do they vary in terms of the number of food outlets covered by each partnership?
- What types of food outlets are included in these partnerships?

And thinking specifically about your partnership with [NAME OF BUSINESS OR TRADE ASSOCIATION] ...

- When did you first enter a Primary Authority partnership with this local authority?
 - When did you specifically enter a food partnership with this local authority?
- How does the partnership work day-to-day?
 - What types of food activities are involved?
 - How do you support the business?
 - How often do you communicate and how?

What were you hoping to get out of taking part in the pilot?

What were your concerns, if any?

C Experience of information sharing (15-20 mins)

I'd now like to discuss your experience of businesses sharing information with you during the NIS pilot...

First of all, what types of information did you receive or access to complete your assessment?

PROBE IF NECESSARY:

- Audit information
 - Carried out by an internal team or a second party company like Shield Yourself, Food Alert etc?
 - How often do sites get audited?
- Pest control visits
 - Carried out by internal team or a contractor?
- Micro samples / survey information
- Scores from previous LA inspections
 - Was this just the FHRS rating, or did you receive Hygiene, Structural and Confidence in Management scores?
- PROBE FULLY: What else?

ASK C2-C4 FOR EACH TYPE OF INFORMATION:

How did you access it?

PROBE IF NECESSARY:

- Who provided this information?
- What format was this information provided in? (i.e. live access to system, Word/Excel, email/paper copies/verbally etc)?

- Did you expect to receive this particular information in this format? Was this agreed in advance?

Were there any clarification questions which needed to be asked on receipt of the information? What were these?

How easy or difficult did you find it to obtain this information? Why?

IF DIFFICULT:

- What could be done differently to make it easier to obtain this information?

CHECK IF C5 AND C7 VARY BY TYPE OF INFORMATION

How did you agree with the [business / trade association] which information should be shared?

Was there any information you wanted that the [business / trade association] couldn't provide or wasn't willing to provide?

How did you decide on when information would be shared?

- Was information shared when it was expected? IF NOT: Why not? How could it be made more timely?

D Analysis of information (15-20 mins)

Thinking now about how the information was used...

Overall, how useful was the information shared with you when making desktop assessments of specific food business outlets?

PROBES:

- What type of information was particularly useful?
- What type of information was *not* useful?

FOR EACH TYPE OF INFORMATION MENTIONED AT C1

How useful was this information?

DELETED

How easy or difficult did you find the task of interpreting and analysing the information provided?

PROBE FOR EACH TYPE OF INFORMATION MENTIONED AT C1 IF NOT ALREADY COVERED

IF DIFFICULT:

- What was it about the information provided that made it difficult to interpret and analyse?
 - The volume of the information?

- The type of information?
 - Lack of internal skills/knowledge?
 - Compiling information provided in a variety of formats?
 - Anything else?
- What could be done to make the information easier to interpret and analyse?

How confident are you with the outcome of the assessments that you have made in terms of quality and accuracy?

PROBES:

- How does this differ from your confidence in the outcome of LA inspections which you have carried out?
- How does this differ from your confidence in the outcome of LA inspections which another LA has carried out?

IF NOT ALWAYS FULLY CONFIDENT:

- Why are you not totally confident in the outcome?
- What would need to change to make you feel more confident?

E Summary and wrap up (10 mins)

Thank you very much for your time so far. Thinking now at an overall level, other than what we've already discussed..

What benefits have there been for [you/NAME OF PA] of taking part in the NIS pilot?

What challenges have you experienced taking part in the NIS pilot?

Have there been any negative impacts?

Now looking forward, beyond the pilot, to if NIS were implemented more widely resulting in fewer LA inspections being needed for some food outlets...

What benefits do you think NIS could have for [you/NAME OF PA] as a Primary Authority?

And thinking about 'the other side of the coin', what drawbacks do you think NIS could have for [you/NAME OF PA] as a Primary Authority?

What do you see as potential barriers to the success of the scheme? PROBE FULLY.

How confident would you be in the real world with having a NIS in place which would mean the frequency of LA inspections is reduced for some food outlets?

What would you recommend for the future in terms of how national inspection strategies are implemented for food partnerships?

What type of role, if any, should the FSA have in terms of overseeing the implementation of national inspection strategies?

Is there anything else you would like to add?

Finally, I would just like to confirm that this survey has been carried out under IFF instructions and within the rules of the MRS Code of Conduct. Thank you very much for your help today.

I declare that this survey has been carried out under IFF instructions and within the rules of the MRS Code of Conduct.		
Interviewer signature:		Date:
Finish time:	Interview Length	mins

Appendix B: Food business topic guide

A Introduction (5 mins)

Introduction by the researcher:

- My name is [NAME] and I work for IFF Research, an independent research company that has been commissioned by the Food Standards Agency to evaluate the National Inspection Strategies pilot. As you'll know, the pilot is testing how NIS works as a concept, in particular whether business data can be used to predict local level compliance. We are speaking to businesses that are taking part in the pilot to explore how you've found the process of preparing and sharing data with Primary Authorities. We will also be talking to Primary Authorities about how they've found the process.
- IFF Research is an independent market research company, operating under the strict guidelines of the Market Research Society's Code of Conduct. This means that anything you tell us will be treated in the strictest confidence, and none of your answers will be attributed to you or the organisation you work for during reporting.
- The interview will last around 45-60 minutes.
- REQUEST PERMISSION TO RECORD – It's just so that we don't have to rely solely on taking notes. The recording will not be shared with the FSA.

B Background on respondent/business (5 mins)

I'd like to start off just by getting some background to help put your answers into context.

First of all, could you tell me a bit more about your job within [NAME OF BUSINESS/TRADE ASSOCIATION]?

And thinking about your partnership with [NAME OF PA] ...

- When did you first enter a Primary Authority partnership with this local authority?
 - When did you specifically enter a food partnership with this local authority?
- How does the partnership work day-to-day?
 - What types of food activities do you work on?
 - How does the PA support you?
 - How often do you communicate and how?

What were you hoping to get out of taking part in the pilot?

What were your concerns, if any?

C Experience of information sharing (20 mins)

I'd now like to discuss your experience of sharing information with [your PA / NAME OF PA] during the NIS pilot...

First of all, what types of information did you share with [NAME OF PA]?

PROBE IF NECESSARY:

- Audit information
 - Carried out by an internal team or a second party company like Shield Yourself, Food Alert etc?
 - How often do sites get audited?
- Pest control visits
 - Carried out by internal team or a contractor?
- Micro samples / survey information
- Scores from previous LA inspections
 - Was this just the FHRs rating, or did you receive Hygiene, Structural and Confidence in Management scores?
- PROBE FULLY: What else?

ASK C2-C4 FOR EACH TYPE OF INFORMATION:

How did you share it?

PROBE IF NECESSARY:

- What format was this information provided in? (i.e. live access to system, Word/Excel, email/paper copies/verbally etc)?
- Was this format agreed in advance?

Did [NAME OF PA] ask any clarification questions on receipt of the information? What were these?

How easy or difficult did you find it to share this information? Why?

IF DIFFICULT:

- What could be done differently to make it easier to provide this information?

How did you agree with [NAME OF PA] which information should be shared?

PROBE IF NECESSARY:

- What information did they request?
- What information, if any, did you suggest that wasn't requested by the PA?
FOR EACH: Did you end up sharing this information or did the PA decide they did not need it?

Was there any information [NAME OF PA] wanted that you couldn't provide or were not willing to provide? Why?

Did you have concerns about sharing any of the information with [NAME OF PA] due to it being commercially sensitive?

PROBE IF NECESSARY:

- What type(s) of information were sensitive?
- Did you have any requirements of the PA in terms of safeguarding this information?
- What could be done to make you feel more comfortable with sharing such information?

Is there any extra information you could provide which you feel it would be useful for the PA to take account of?

How did you decide on when information was shared?

CHECK IF THIS VARIES BY TYPE OF INFORMATION

Overall, how long did it take to compile and transfer all of the information shared with the PA per assessment?

- Were there any specific steps that were particularly time consuming?
- What could be done differently to make the process more efficient?

D Summary and wrap up (10 mins)

Thank you very much for your time so far. Thinking now at an overall level, other than what we've already discussed...

What have been the benefits for [NAME OF BUSINESS/TRADE ASSOCIATION] of taking part in the NIS pilot?

What challenges have you experienced taking part in the NIS pilot?

Have there been any negative impacts on you or the business / trade association?

Now looking forward, beyond the pilot, to if NIS were implemented more widely resulting in fewer LA inspections being needed for some food outlets...

What benefits do you think NIS could have for your business / trade association?

And thinking about 'the other side of the coin', what drawbacks do you think NIS could have for you as a business / trade association?

What do you see as potential barriers to the success of the scheme? PROBE FULLY.

How confident would you be in the real world with having a NIS in place which would mean the frequency of LA inspections is reduced for some food outlets?

IF NOT FULLY CONFIDENT:

- Why would you not be totally confident?
- What would need to change to make you feel more confident?

What would you recommend for the future in terms of how national inspection strategies are implemented for food partnerships?

Is there anything else you would like to add?

Finally, I would just like to confirm that this survey has been carried out under IFF instructions and within the rules of the MRS Code of Conduct. Thank you very much for your help today.

I declare that this survey has been carried out under IFF instructions and within the rules of the MRS Code of Conduct.		
Interviewer signature: _____		Date:
Finish time:	Interview Length	mins

Appendix C: Local authority topic guide

E Introduction (5 mins)

Introduction by the researcher:

- My name is [NAME] and I work for IFF Research, an independent research company, that has been commissioned by the Food Standards Agency to evaluate the National Inspection Strategy (NIS) pilot. This project involves primary authorities using data provided by partner businesses to see if they can predict local level compliance amongst the business' outlets. The project is the start of work to explore the concept of national inspection strategies. Ultimately, national inspection strategies **could** lead to a reduction in the frequency of local authority inspections of compliant food business outlets within robust primary authority partnerships. We know you haven't been directly involved in the pilot, but would like to explore your thoughts about the concept.
- IFF Research is an independent market research company, operating under the strict guidelines of the Market Research Society's Code of Conduct. This means that anything you tell us will be treated in the strictest confidence, and none of your answers will be attributed to you or the organisation you work for during reporting.
- The interview will last around 30-40 minutes.
- REQUEST PERMISSION TO RECORD – It's just so that we don't have to rely solely on taking notes. The recording will not be shared with the FSA.

F Background on respondent/LA (5 mins)

I'd like to start off just by getting some background on you and your Local Authority...

First of all, could you tell me a bit more about your job as an individual officer within the Local Authority?

Do you have any primary authority partnerships? (e.g. Health and safety, trading standards, etc.)

- IF YES: How many do you have? What are they for?
- IF NO: Why not?

IF NOT A PA FOR A FOOD PARTNERSHIP: Have you ever considered entering a food partnership with a business?

- IF YES: Why did you consider it? Why did you end up not doing so?

- IF NO: Why not?

IF NOT A PRIMARY AUTHORITY: Before you were asked to take part in this research, how aware were you of the role of primary authorities, and of how they operate in food partnerships?

- Can you tell me a bit about what you think they do?
- How much interaction have you had with other local authorities who are primary authorities? How have you found working with them?
 - What makes a good/bad interaction?

Do you know what an Inspection Plan is?

- How would you describe the purpose of these?
- Have you used these in the past?
- IF USED INSPECTION PLANS: How did you find using these?

And – again, before you were asked to take part in this research – how aware were you of National Inspection Strategies?

G Perceptions of the NIS concept (10-15 minutes)

As I mentioned at the beginning of this interview, the basic concept we are exploring is whether PAs can use business information and data to predict local level compliance. If a PA is satisfied that there is sufficient evidence that a business is well managed, it could implement a National Inspection Strategy which would reduce the average frequency of LA inspections for the food outlets of businesses they are in partnership with.

What do you think of this as a concept?

- PROBE IF NECESSARY: How favourable or unfavourable do you feel towards it? What would be good about it? What would be bad about it?
- Why do you say this?

What do you think would be the main benefits of a national inspection strategy?

- What are the benefits to local authorities who do not act as a primary authority?

- And what benefits do you think there would be for primary authorities using a NIS?

And what do you think would be the main drawbacks?

- What are the drawbacks to local authorities, who do not act as a primary authority?
- And what drawbacks do you think there would be to primary authorities using a NIS?

What types of information do you think primary authorities would need from businesses to accurately predict local level compliance?

- What else?
- Which would be most useful?

How confident would you be in primary authorities using business data to determine the frequency of local authority inspections for food outlets?

- IF NOT FULLY CONFIDENT: Why are not fully confident? What do you see as the risks of this approach? What could make you more confident in it?

How would you feel if you were advised by a primary authority to reduce the number of inspections you carry out for a particular food outlet?

- How would you react?
- What might your concerns be?
- What might the positives be?

H Information sharing (10-15 minutes)

What types of information do you hold as a local authority that a primary authority may find useful when they are thinking about compliance at a local level?

- Knowledge/information around local environmental health issues?
- What examples can you think of? What else?
- PROBE FULLY BEFORE PROMPTING IF NECESSARY:
 - Resident complaints
 - Information from planning permission requests
 - Information on sites prone to flooding

- Information on sites near major road or construction works
- Any other information that could only be known/gained at a local level?

Thinking about the different types of information you've mentioned, which of these do you think would be most important for predicting food hygiene business compliance?

- Why do you say that?
- Which would be less important? Why?

How easy or difficult would it be to provide this information to a primary authority?

- How could it be made available?

PROBE ON BOTH FOR EACH TYPE OF INFORMATION MENTIONED AT D1

What barriers do you think there could be to primary authorities obtaining and accessing information from LAs?

PROMPT IF NECESSARY

- Data security
- Time constraints
- The format of the information (e.g. paper records)
- Sharing of informal intelligence?

Is there any other information you think primary authorities would need *from local authorities* to accurately predict compliance, that businesses would not necessarily be able, or willing, to provide?

- What type of information?

I Summary and wrap up (2 minutes)

What would you recommend for the future in terms of how national inspection strategies are implemented for food partnerships?

How important do you feel LA-held data is to ensuring national inspection strategies work well? PROBE IF NECESSARY: Is it essential or a nice-to-have? Does this vary by information type?

What type of role, if any, should the FSA have in terms of overseeing the implementation of national inspection strategies?

Is there anything else you would like to add regarding what we've discussed today?

Finally, I would just like to confirm that this survey has been carried out under IFF instructions and within the rules of the MRS Code of Conduct. Thank you very much for your help today.

I declare that this survey has been carried out under IFF instructions and within the rules of the MRS Code of Conduct.		
Interviewer signature:		Date:
Finish time:	Interview Length	mins

Appendix D: Comparison between actual and predicted FHRs ratings

8.1 The following table shows the number of assessments given a variety of actual and predicted FHRs ratings.

- Green shading indicates a match between the ratings
- Amber shading indicates the predicted rating being lower than the actual rating
- Red shading indicates the predicted rating being higher than the actual rating

Table 8.1 Comparison between actual and predicted FHRs ratings

		Actual FHRs ratings						Sum:
		5	4	3	2	1	0	
Predicted ratings	5	243	9	2	2	0	0	256
	4	31	8	1	0	0	0	40
	3	7	2	0	1	0	0	10
	2	4	2	1	0	0	0	7
	1	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0
Sum:		285	21	4	3	0	0	

“

IFF Research illuminates the world for organisations businesses and individuals helping them to make better-informed decisions.”

Our Values:

1. Being human first:

Whether employer or employee, client or collaborator, we are all humans first and foremost. Recognising this essential humanity is central to how we conduct our business, and how we lead our lives. We respect and accommodate each individual's way of thinking, working and communicating, mindful of the fact that each has their own story and means of telling it.

2. Impartiality and independence:

IFF is a research-led organisation which believes in letting the evidence do the talking. We don't undertake projects with a preconception of what "the answer" is, and we don't hide from the truths that research reveals. We are independent, in the research we conduct, of political flavour or dogma. We are open-minded, imaginative and intellectually rigorous.

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