



Evaluating the use of remote assessments by local authorities for regulating food businesses

Final report

March 2021

ICF makes big things possible

ICF is a global consulting and technology services provider with more than 7,000 professionals focused on making big things possible for our clients. We are policy specialists, social scientists, business analysts, technologists, researchers, digital strategists and creatives. Since 1969 government and commercial clients have worked with ICF to overcome their toughest challenges on issues that matter profoundly to their success. Our five core service areas are described below. Engage with us at icf.com.



Research + Analyse

Our teams delve deep into critical policy, industry and stakeholder issues, trends, and behaviour. By collecting and analysing data of all kinds, we help clients understand the current landscape clearly and plan their next steps wisely.



Assess + Advise

With equal parts experience and dedication, our experts get to the heart of the issue—asking all the right questions from the start. After examining the results and evaluating the impact of research findings, we counsel clients on how to best navigate societal, market, business, communications, and technology challenges.



Design + Manage

We design, develop and manage plans, frameworks, programmes, and tools that are key to each client's mission or business performance. These solutions often stem from our analytics and advice.



Identify + Implement

Our experts define and put into place the technology systems and business tools that make our clients' enterprises more effective and efficient. We deploy standard or customised methodologies based on the business context.



Engage

Realising the promise of the digital revolution requires foresight and heightened understanding. Both are baked into the solutions-focused engagement work that runs through all we do.

Evaluating the use of remote assessments by local authorities for regulating food businesses

Final report

A report submitted by ICF Consulting Services Limited

Date: March 2021

Job Number 30302520

Mar Maestre
ICF Consulting Services Limited
Riverscape
10 Queen Street Place
London
EC4R 1BE
T +44 (0)20 3096 4800
www.icf.com

Document Control

Document Title	Evaluating the use of remote assessments by local authorities for regulating food businesses
Job No.	30302520
Prepared by	Lucy Adams, Mar Maestre
Checked by	James Leather
Date	10 March 2021

ICF has used reasonable skill and care in checking the accuracy and completeness of information supplied by the client or third parties in the course of this project under which the report was produced. ICF is however unable to warrant either the accuracy or completeness of such information supplied by the client or third parties, nor that it is fit for any purpose. ICF does not accept responsibility for any legal, commercial or other consequences that may arise directly or indirectly as a result of the use by ICF of inaccurate or incomplete information supplied by the client or third parties in the course of this project or its inclusion in this project or its inclusion in this report. This report is the copyright of Food Standards Agency and has been prepared by ICF Consulting Services Ltd under contract to Food Standards Agency. The contents of this report may not be reproduced in whole or in part, nor passed to any other organisation or person without the specific prior written permission of Food Standards Agency.

Contents

- Abstract 1
- Executive summary 2
- 1 Introduction 6
 - 1.1 Context 6
 - 1.2 Research objectives 7
 - 1.3 Methodology 8
- 2 Summary of findings 10
 - 2.1 Overview of the use of remote assessments 10
 - 2.2 Enablers and barriers to implementing remote assessments 18
 - 2.3 Benefits and limitations of using remote assessments 20
- 3 Lessons learned and future implications for remote assessment use 24
 - 3.1 Best practices 24
 - 3.2 Further guidance and support 27
- 4 Conclusions 29
- ANNEXES 31
 - Annex 1: List of LAs interviewed and key characteristics 32
 - Annex 2: Topic guides 33

Abstract

This report presents the findings of a short evaluation carried out by ICF on the use of remote assessment techniques by Local Authorities across England, Wales, and Northern Ireland, for carrying out food hygiene and food standards assessments following the onset of the Covid-19 pandemic.

The evaluation consisted of 20 interviews with a diverse typology of LAs, and with two food businesses, exploring the stakeholders' experiences of using remote assessments. Findings reflect that Local Authorities followed the Food Standards Agency's advice as to how and when to use remote assessments. Research revealed that they were mostly used to enable exchanges of documentation and information about food businesses pre-inspection, to identify key points of focus for subsequent onsite visits, as well as, in certain business contexts, to help local authorities determine whether an imminent onsite visit was required or could be delayed to a later time.

All local authorities interviewed that had carried out some type of remote assessment agreed that these techniques had been useful to enable work to continue safely during the Covid-19 pandemic, as well as to prioritise making visits to the most urgent cases. A smaller subset of the Local Authorities interviewed explored the use of remote techniques to assess businesses in different ways, obtaining additional information remotely, and using the time spent onsite with food businesses more effectively.

The findings are followed by a set of best practices identified by officers and further advice requested by them for enabling continued use of remote techniques beyond the Covid-19 pandemic context.

Executive summary

Introduction

The Food Standards Agency (FSA) issued advice to Local Authorities (LAs) detailing their expectations concerning the prioritisation of official control activities during the Covid-19 pandemic. The FSA advised LAs to incorporate remote assessments (RAs) within their official control procedures. RAs do not replace onsite inspections of food business operators (FBOs) by LAs. Instead, they are selectively used to enable a pre-inspection exchange of documentation, encourage pre-emptive contact-making, and identify key points of focus for subsequent onsite visits. Amongst other formats, RAs can take the form of a phone call, a video call or the exchange of information online. RAs were also recommended by the FSA, in certain business contexts, to help LAs determine whether an imminent onsite visit was required or if it could be delayed.

ICF was commissioned by the FSA to conduct a short evaluation of LAs' experiences of using RAs, to inform thinking about future regulatory practice. The study was tasked with answering seven research questions about LAs' usage of RAs:

1. When, where, and why have RAs been used by LAs?
2. What technological capabilities are necessary to facilitate RAs?
3. What are the barriers and enablers to the implementation of RAs from a local authority perspective?
4. What have been the benefits to local authorities from using RAs? What have been the limitations?
5. What has been the FBO experience of the RAs?¹
6. What are the good / best practices in the conduct of RAs?
7. What further guidance is needed to conduct RAs to ensure a consistent approach to delivery?

Methodology

The study commenced with an initial scoping and desk research phase, followed by 20 interviews with a diverse typology of LAs. Interviews lasted for 30-45 minutes. The study team's intention was to interview FBOs too, though it was recognised from the outset that this would be challenging due to the Covid-19 pandemic and because sample construction depended on FBOs opting-in to the study via LA-issued invites. Only three FBOs opted-in, and from these only two interviews were completed. This means that, due to the small FBO interview sample, findings about FBOs' experiences should not be necessarily considered representative of the wider FBO population. The results are included to illustrate points, but do not reflect the expected range of views that FBOs might have. Interviews with LAs and FBOs were completed between October and December 2020. Qualitative interview data were analysed using a coding frame structured around the research questions listed above.

¹ This study question is embedded in the answers to study questions 3 and 4, showcasing in boxes FBOs experience of RAs.

Summary of findings

Findings have been structured around the research questions listed above.

When, where, and why have RAs been used by LAs?

LAs used RAs to examine FBOs across England, Wales and Northern Ireland, enabling interventions of some form to be carried out by officers during the Covid-19 pandemic. All the LAs using RAs (18 out of 20 interviewed) followed FSA advice consistently and reportedly found this advice helpful.

They used RAs to:

- reduce the time spent by officers on business premises,
- target onsite visits better, and
- postpone routine onsite visits to lower risk FBOs – referring especially to food businesses with consistent compliance histories, and/or new businesses considered likely to be very low risk (e.g. home bakers).

LAs reported contexts in which RAs were more useful than others (see Table ES1.1):

Table ES1.1 Characteristics of contexts for RA use

Context	Description
+	LA officers were confident in the accuracy of assessments made remotely, e.g. because FBOs had longstanding positive relations with the LA and trust had been built, or because the businesses had consistent compliance histories.
+	The RA targeted food businesses where the public health risk associated with a failure to detect a problem during a RA was likely to be low. For example, LAs favoured using RA in food standards inspections rather than food hygiene inspections, as parameters such as packaging or labelling could be assessed relatively confidently via remote means, whereas this is not always possible for food hygiene parameters.
+	There was an expectation that a LA would gain significant benefits from a RA in terms of convenience, time commitment, and information gathered.
-	Officers suspected that information received from FBOs remotely might not be accurate (owing to lack of trust or business difficulties in cooperating).
-	The potential risk to public health associated with problems being missed during a RA was deemed to be high.
-	LAs perceived the RA would not add value to their ongoing work.

What technological capabilities are necessary to facilitate RAs?

Most LAs used phone calls and emails to carry out the RAs, while a small number of the LAs interviewed (4/20) used video technology or bespoke services.

Reportedly, the technological requirements for LAs and FBOs were access to i) a work phone; ii) a good internet connectivity to enable online communications or files to be shared; and iii) access to food business documents online or a scanner.

What are the barriers and enablers to the implementation of RAs from a local authority [and a food business] perspective?

The main factors that influenced the delivery of RAs were related to (see Table ES1.2):

Table ES1.2 Main factors which influenced RA delivery

Type	Description
Factors relating to the external environment	<ul style="list-style-type: none"> ■ type of business and inspection, and ■ access to technology.
Factors relating to the Local Authority	<ul style="list-style-type: none"> ■ officers' competencies and prior knowledge of the food business, ■ officers' attitudes and incentives for investing time in RA, and ■ LAs' resourcing capacity (e.g. number of full time staff).
Factors relating to food businesses	<ul style="list-style-type: none"> ■ FBOs' technological abilities and resource access (e.g. having good connection to correspond online, or access to files remotely/online), ■ ease of communication with FBOs (e.g. having/lacking English language skills), ■ relationships between FBOs and LA officers (e.g. having trust built over time vs. no background on a new business), and ■ time availability and personnel to carry out RAs.

*What have been the benefits to local authorities [and food businesses] from using RAs?
What have been the limitations?*

LAs perceived the main benefits of RAs for their work to be:

- allowing them to continue to carry out their work during the Covid-19 pandemic, particularly when lockdowns were in place,
- enabling them to have more structured conversations with FBOs (e.g. by using prompts / questionnaires over the phone without onsite distractions),
- giving them more time to review FBO documents prior to a visit, and
- enabling them to prioritise the most urgent work and postpone less urgent visits, thus reducing time spent in low-risk establishments.

They also highlighted key limitations, alternatively, which included:

- providing a perceived opportunity for FBOs to conceal information and falsify/mask problems with their businesses, and
- creating added burden, in terms of time and resources, for LAs who already had heavy workloads, limited staff and resource shortages, owing to Covid-19 redeployment.

Benefits and limitations for food businesses were different. Ideas about these outcomes were contributed by both LAs and food businesses themselves, as seen in Table ES1.3.

Table ES1.3 Key benefits and limitations of using RAs for food businesses

Benefit / limitation	Description
Benefits	<ul style="list-style-type: none"> ■ gaining more time to prepare for interventions and improve their performance, ■ a perceived reduction in stress associated with inspections, ■ reducing time spent by inspectors on food business premises, and ■ gaining new ability to pre-schedule engagements to avoid disrupting service hours.
Limitations	<ul style="list-style-type: none"> ■ administrative and time burden incurred, through needing to locate and scan required documents, ■ inconvenience created for businesses who are not tech-literate, or don't have an easy access to accounts and/or devices, ■ loss of regular informal interaction between FBOs and LA officers, and ■ potential for negative assessment outcomes if business representatives are misrepresented during a remote assessment.

What are the good / best practices in the conduct of RAs?

LAs highlighted good practice lessons learned around three areas:

- minimising food safety risks and costs for LAs by: i) allowing FBOs time to prepare documentation online; ii) prioritising RAs in low-risk settings (e.g. newsagents) and iii) triangulating evidence (e.g. third party audit reports),
- leveraging the benefits of RAs, by: i) starting conversations and sharing guidance with new businesses remotely, and ii) delaying onsite visits in low-risk settings or where FBOs or their clients are vulnerable (i.e. care homes), and
- ensuring consistency in the use of RAs by officers and, potentially, across multiple LAs, by (i) sharing feedback between officers and neighbouring authorities, and (ii) by developing in-house guidance.

What further guidance is needed to conduct RAs to ensure a consistent approach to delivery?

The final section is a summary of LAs recommendations for the FSA:

- LAs seek further guidance from the FSA on where and how best to use remote assessments. This included requests for:
 - examples of where RAs have been successful and unsuccessful,
 - specification of contexts in which a remote technique should not be used, and
 - sharing practices to support LAs to learn from each other.
- LAs would also like for RAs to be integrated into their work structurally, for example by being recognised distinctly in the Local Authority Enforcement Monitoring System (LAEMS). Suggestions included:
 - incorporating RA in LAEMS using a distinct code, so RAs can be an annual performance indicator,
 - incentivising an outcome-oriented approach to defining success, and
 - ensuring there is centralised monitoring and endorsement of RA work.

1 Introduction

The Food Standards Agency (FSA) has issued advice to Local Authorities (LAs) detailing their expectations concerning the prioritisation of official control activities during the COVID-19 pandemic. The guidance and advice have been regularly updated to reflect the changing situation to support LAs in their delivery of official controls during the pandemic.

As part of their response to Covid-19, the FSA authorised LAs to incorporate remote assessments (RAs) within official control procedures. This is explained in more detail below.

1.1 Context

The FSA is a non-ministerial government Department, covering England, Wales and Northern Ireland, whose mission is 'to protect public health and consumers' wider interests in relation to food'. The FSA, as the Central Competent Authority, have responsibility for overseeing LAs' delivery of official controls in food and feed businesses. Statutory Codes of Practice provide a framework setting out how and to what standards local authorities should deliver food hygiene and standards controls. These food codes specify, for example, the system and risk assessment criteria for determining the appropriate frequency of inspections and other interventions at food establishments for food hygiene and food standards. The codes also include guidance for officers on how to carry out food business inspections to ensure these are consistently undertaken.

Food hygiene inspections include assessing the following areas of businesses:

- food handling (i.e. food preparation, cooking, reheating, cooling and storage),
- onsite premises conditions (in terms of cleanliness, layout, ventilation, lighting and pest control measures), and
- management of food safety (including their processes and training systems).

Food standards inspections include assessing the following areas of businesses:

- food presentation, packaging and labelling (including health claims and advertising),
- ingredients (such as proper specification of additives and declaration of allergens, as well as checking for contaminants/residues in food), and
- traceability (i.e. business records of ingredients sourcing and supply chains).

Ordinarily, both types of inspection would be conducted via an unannounced (in most cases) premises visit, to give representative insight into normal conditions.

In response to the restrictions imposed due to the Covid-19 pandemic, FSA advice aimed to facilitate the effective use of LA resources and to minimise time spent on business premises, by extending application of remote techniques (previously permitted only for alternative enforcement strategies (AES) work) to a range of official controls. The advice issued gave examples of how RAs could be used for food hygiene and food standards assessments.

RAs were not intended to replace onsite inspections, but rather to enable exchanges of documentation and information about food businesses pre-inspection. The intention behind RAs was to allow LA officers to identify key points of focus for subsequent onsite visits. RAs were also recommended, in certain business

contexts, to help LAs determine whether an imminent onsite visit was required or if it could be delayed to a later time.

The advice made clear that food hygiene ratings (FHRs) could only be given or updated following an onsite visit and could not be made based on a remote assessment alone. It also made clear, where only a remote assessment had been carried out, that the date of the next planned intervention should not be changed, such that it remained listed as due for visiting when next possible.

1.2 Research objectives

In this context, ICF was commissioned by the FSA to conduct a short evaluation of LAs' experiences of using RAs to inform thinking about future regulatory practice and advice.

The study answers a set of questions, responses to which are documented throughout the following sections, as shown in Table 1.1:

Table 1.1 Study structure

Study questions	Sections
1. When, where, and why have RAs been used by LAs?	Overview of the use of RAs (section 2.1)
2. What technological capabilities are necessary to facilitate RAs?	Overview of the use of RAs (section 2.1) <ul style="list-style-type: none"> ■ Technological capabilities necessary (section 2.1.2)
3. What are the barriers and enablers to the implementation of RAs from a local authority perspective? <ul style="list-style-type: none"> a. What has been the food business (FBO) experience of the RAs? 	Barriers and enablers to implementing RAs (section 2.2) <ul style="list-style-type: none"> ■ Box 2.2 Barriers and enablers for food businesses
4. What have been the benefits to local authorities from using RAs? What have been the limitations? <ul style="list-style-type: none"> a. What has been the FBO experience of the RAs? 	Benefits and limitations of using RAs (section 2.3) <ul style="list-style-type: none"> ■ Box 2.3 Benefits and limitations for food businesses
5. What are the good / best practices in the conduct of RAs?	Best practices (section 3.1)
6. What further guidance is needed to conduct RAs to ensure a consistent approach to delivery?	Further guidance and support (section 3.2)

1.3 Methodology

1.3.1 Desk research and survey analysis

The study began with an initial scoping and desk research phase. The FSA provided:

- data collected from LAs on their use of RAs and some preliminary analysis of this, and
- details of the guidance and advice given to LAs in relation to use of RAs,

These materials were reviewed with reference to the research questions. Analysis of RA data gave early insight into potential patterns of RA usage (by type of LA, FBO context, local characteristics etc.) and qualitative responses detailing LA officer perspectives on and their experience of RAs gave insight into factors implicated in determining those patterns of usage/drop-out, and the quality of RA achieved.

This data analysis was used to develop and select a sample of LAs for interviewing. Cases were selected to provide a broad representation of LAs, seeking coverage across the following LA characteristics:

- LA country (England, Wales, Northern Ireland). The sample proposal included a higher number of LAs from England, to represent the total number of LA existing in each country (England with 340, Northern Ireland with 11 and Wales with 22),
- type of LA (Unitary Authorities, District Councils, Metropolitan Districts, London Boroughs, County Councils),
- resources available per LA, based on the reported allocated full time equivalent professional posts for 2020/21 to operate food and feed controls (low – less than four employees, medium – between 4 and 7 employees, and high – more than 7 employees), and
- use of RAs (whether LAs have continued to use them, had started to use them but decided to stop, or have never used them).

1.3.2 Interview programme

Twenty interviews were carried out with LAs via either Skype or a telephone call. These interviews lasted from 30-45 minutes each. Interviews were recorded and written up. The study attempted to interview FBOs too, though it was recognised from the outset that this would be challenging given the issues posed by Covid-19. Potential interviewees were identified by asking LAs to pass on a request for interview to FBOs who they had engaged remotely. Three FBOs initially responded to these requests, but only two interviews were carried out as one FBO declined to be interviewed.

All the interviews with LAs and FBOs were completed between October and December 2020. The qualitative data collected via the interview programme was then analysed using a coding frame structured around the research questions. The interviews addressed the research questions in detail, and interview topic guides used for LAs and FBOs were prepared and refined to incorporate findings from the aforementioned survey, as well as inputs from the FSA (see Annex 3 for the topic guides).

The final characteristics of the LAs interviewed are summarised in Table 1.2 below. A more detailed list can be found in Annex 1.

One of the objectives of the evaluation was to capture LAs' experiences of using remote assessments to inform thinking about future regulatory practice. As such, the sample purposively engaged more LAs who were using RAs instead of those not using them. For the other characteristics, the LA sample was balanced across different types of LAs. However, the sample could be subject to bias, as LAs interviewed² were those that had provided data about their use of RAs to the FSA, and they had to be willing (and have capacity) to be interviewed.

Table 1.2 Characteristics of LAs selected to be interviewed

Characteristic	Description	Total
Location	Northern Ireland	3
	England	15
	Wales	2
Use of RA	Yes	15
	Stopped	3
	No	2
Staffing resources available	Low (fewer than 4)	6
	Medium (4 to 7)	9
	High (more than 7)	5

The food businesses interviewed had the following characteristics:

- family-run cafe business (serving English traditional food, breakfasts, and oriental food). The RA was a food hygiene control that was due. The business has been operational for 12 years, and they had a rating of 5 according to the Food Hygiene Rating Scheme (FHRS) at the last three consecutive planned inspections by the LA, and
- family-owned butchers (processing raw meat and supplying to schools, hospitals, and catering companies). The RA was a food standards control that was due. The business has been operational for 35 years, although they moved premises five years ago. They were a British Retail Consortium (BRC) accredited business.

The FBO sample was self-selected through secondary recruitment by the LAs interviewed. It was too small and should not be considered representative of the wider FBO population. The results are included to illustrate points, but do not reflect the expected range of views that FBOs might have.

² Other than those from Welsh authorities as the FSA had not requested data on RA use in Wales

2 Summary of findings

2.1 Overview of the use of remote assessments

LAs used remote techniques to assess food businesses across England, Northern Ireland, and Wales, enabling interventions of some form to be carried out by officers during the pandemic. LAs using RAs (18/20) followed FSA advice consistently and found this advice helpful to being able to do their work during the pandemic. One officer described the advice given as the ‘*most helpful thing the FSA could have done*’, and three officers with pre-pandemic experience working remotely for alternative enforcement strategies (AES) considered the application of RAs to broader official controls useful, given the circumstances.

LAs’ uptake and use of RAs was a dynamic process, with most adapting their RA focus and usage over time. Nine (out of 18) officers said that their application of RAs had increased over time as officers gained experience and confidence. These changes were made in response to:

- the FSA’s continuous advice (regularly updated for LAs during the pandemic),
- LAs’ early experiences of RA successes/failures,
- changes in national and local Covid-19 lockdown restrictions, and
- staff re-deployment (related to Covid-19) and other resource constraints.

LAs using RAs (18/20) perceived them to have been beneficial during the pandemic. They used RAs mostly to:

- delay visits to the premises where this was possible,
- target and prioritise onsite visits better, and
- reduce the time spent onsite (visiting FBOs) by inspectors during interventions.

The LAs that did not use RAs (2/20) explained they had limited resources to carry them out, particularly during the pandemic, as well as reduced access to the required technology. Furthermore, they did not perceive that RAs could ease their workload or bring other benefits.

Those LAs that had stopped using RAs (3/20), did so because they also did not perceive any benefits of carrying out RAs once lockdown had eased and they were able to visit FBOs again. Seven other LAs reported using RAs less between June and November 2020, as loosening of lockdown restrictions and access to personal protective equipment (PPE) had allowed them to do increasingly more onsite. One of the LAs that had stopped using RAs explained:

“We discontinued them [RAs] because we found them to be ‘very limited’ in use. The only benefit which remote techniques had provided to officers was the safety aspect, in the context of the virus specifically, but considered that now – with appropriate risk assessments in place – physical inspections were more comprehensive. At the time, remote assessments had been useful because they enabled some continued intervention and checking in via phone interviews. It had been better than nothing”.

The rest of this section explores the reasons why LAs used RAs, the technology employed to carry these out, and the differences in usage by type of assessment carried out by the LAs.

2.1.1 When, where and why?

LAs used RAs with different aims:

- eight LAs used RAs before onsite visits to either reduce the time spent by officers on business premises, or to target onsite visits better. The RAs were used to gather information from FBOs verbally (via phone or online calls), requesting additional documents, and, in some cases, used video calls to view the premises,
- six LAs used RAs also to postpone routine onsite visits to lower risk businesses, or those with consistent compliance histories, rolling over FBOs' previous (but not awarding new) food hygiene ratings. They also used them to assess, and potentially postpone visits to new businesses considered likely to be very low risk (e.g. home bakers). RAs without an onsite visit were used by LAs in the following circumstances:
 - to follow-up contacts/check-in informally with FBOs,
 - for enforcement purposes, when LAs asked about previously identified structural requirements (e.g. to check that addition of a wash basin had been made),
 - to investigate intelligence in certain cases (e.g. to examine a bad review online given to a low risk business), and
 - to make early contact with new businesses and give them advice and training (especially related to the rise in home caterers set up during the pandemic).
- four LAs were not using RAs for inspection purposes or had stopped using RAs when initial lockdown restrictions were lifted, and
- as an exception, two LAs interviewed (one conducting food hygiene controls only, and one food standards only) had replaced onsite visits with RAs³. According to them, the information gathered was comparable to (or even more detailed than) what could be gathered from onsite visits. One of these admitted issuing food hygiene ratings using a RA, contrary to the FSA's advice. The officer interviewed from this LA explained:

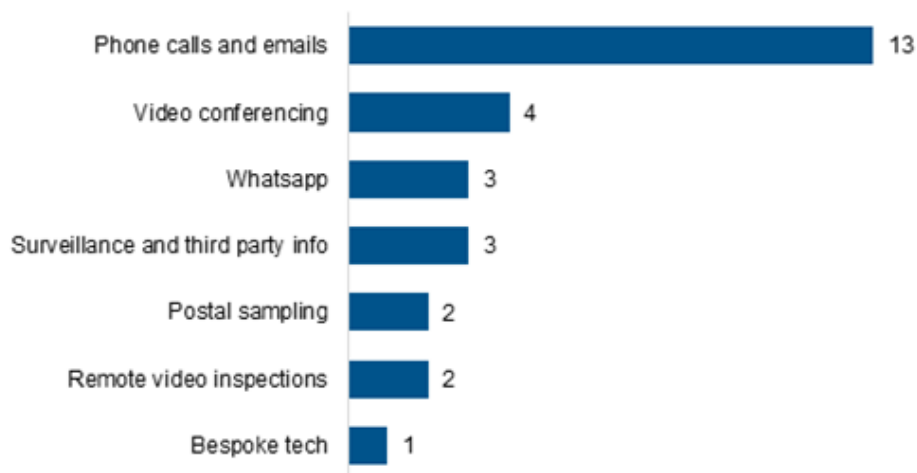
"We have been using it [RA] for ratings. This was a team decision. We are of the strong opinion that you can see what you need to see in order to come up with the score.[The LA verifies the remote information received with video, photographs and other intelligence]".

2.1.2 Technological capabilities necessary to facilitate remote assessments

The sample of LAs interviewed used a variety of technology to carry out RAs, as shown in Figure 2.1, with phone calls and emails the most common method used.

³ RAs do not replace physical inspections, nor does FSA advice allow this.

Figure 2.1 Technology types used by LAs



Video conferencing platforms (including Skype, Teams and Zoom) were used by four LAs to:

- have pre-inspection consultations to reduce time onsite,
- assess suitability of businesses for postponing visits, and
- conduct tours of FBO premises for verification purposes.

One LA used a bespoke video inspection package from a third-party provider, and two others mentioned that they had been exploring alternative technology for future use.

In addition to the technology used, LAs processed and managed the data collected differently. Of the 18 LAs who conducted RAs, 12 created a dedicated code on their data management information platforms to record RAs distinctly from conventional work, following the FSA's recommendations. In practice, however, 5 of these 12 did not use the codes consistently, so they were unable to report the number of RAs conducted. The remaining 6 LAs did not record RAs distinctly from onsite inspection work from the offset⁴.

Box 2.1 below describes the technology requirements, as highlighted by LAs, for carrying out RAs successfully.

Box 2.1 Minimum technology requirements

Most LAs said that using phone calls and emails to contact FBOs was enough to carry out a RA. LA officers said that they required:

- a work phone to call businesses on,
- sufficient bandwidth to share and receive files (especially photos and videos)⁵, and
- access up-to-date contact information for FBOs (in LA records or online).

⁴ Some LAs explained they had been too busy to set up new monitoring system codes (especially under Local Authority Enforcement Monitoring System (LAEMS)). Another officer deemed the quality of RA evidence comparable to onsite, considering they did not need to differentiate.

⁵ While not raised directly, the need for a computer to access email functionality was implied.

According to LA officers, FBOs needed:

- a working company email address and phone number (not having to use personal or family accounts),
- internet access and/or phone signal, and
- electronic documents available (or a scanner to make copies).

Those LAs who had explored video conferencing identified that, for it to be effective, it was important that:

- officers were able to command authority verbally during the video RA,
- officers could explain their requirements clearly over video to the FBOs,
- FBOs had good knowledge of the local language(s), and
- both LAs and FBOs had access to devices and subscriptions for accessing video software.

One LA also mentioned that not being able to use informal social media platforms on their work phones, such as WhatsApp, had been a challenge.

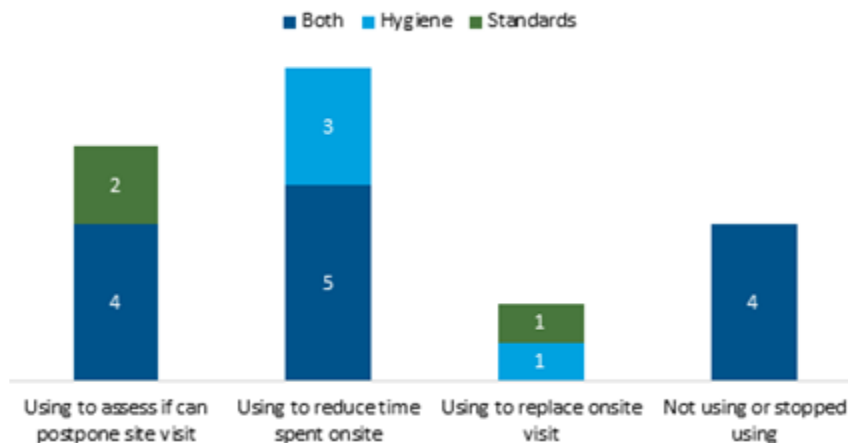
Two LA officers raised concerns about the data protection implications of using these channels to exchange information with businesses. Particularly, one of these two officers expressed that data protection concerns had prevented them from using social media as a form of RA.

2.1.3 Use of remote assessments by type of control (hygiene or standards)

The use of RAs differed depending on the type of official control the LAs were focusing on. Of the sample of LAs interviewed, 13 conducted both food hygiene and food standards controls, 4 conducted only food hygiene and 3 conducted only food standards interventions.

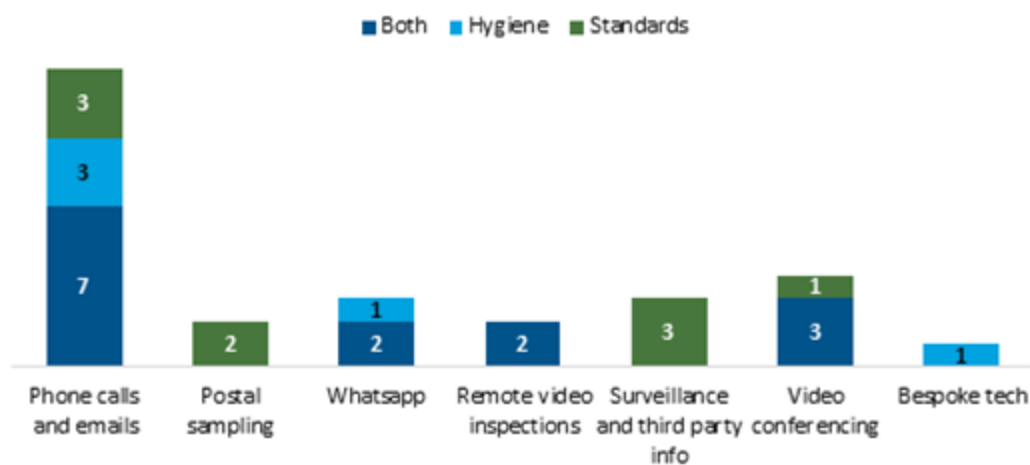
Figure 2.2 shows that the type of official control carried out (hygiene and/or standards) did not influence the LAs sampled to use or not use RAs. Although the sample was small, use of RAs to postpone visiting tended to be reported more by food standards authorities, whereas food hygiene LAs used it more to limit time spent onsite. This may be because food standards RAs were regarded as more accurate and easier to carry out than hygiene ones (as explored later, in section 3.1).

Figure 2.2 Breakdown of the ways that LAs used RAs and the nature of inspection work they carried out⁶



LAs that completed food standards RAs used a wider variety of technology than hygiene LAs did to supplement information collected via phone calls and emails, as Figure 2.3 shows.

Figure 2.3 Media used to conduct RAs by LA inspection focus⁷



Officers involved in remote food standards controls explained that parameters such as food quality, processes and labelling could be assessed relatively confidently via remote means using remote strategies. Officers explained that this was not possible for food hygiene parameters such as observing cleanliness. LAs used RAs to complement food standards assessment by:

- postal sampling (using a covert credit card to order food for spot-check analysis of labels and food allergens/ingredients),
- remote video touring around FBO premises,
- surveying third party audit reports (to gain intel based on inspections conducted by other parties),

⁶ Base size is the 20 LAs interviewed

⁷ Base size is the 20 LAs interviewed. The graph accounts for all the media forms mentioned by LAs, noting that some mentioned more than one.

- searching online marketplaces to find public information for verifying menus and operational details provided by smaller businesses, and
- seeking publicly available online information and reviews.

Some of these measures (namely postal sampling and surveying third party evidence) had been used prior to the pandemic by some LAs to assess standards, other LAs reported using them for the first time following FSA advice and the onset of national lockdowns.

2.1.4 Context where RAs worked

LAs mentioned that the contexts in which RAs worked better were where:

- officers were confident in the accuracy of assessments made remotely,
- there was a low public health risk associated with failure to detect a food business' problems during the remote assessment, or
- there was expectation that the RA would bring significant benefits, in terms of convenience, time and information gathered, anticipated by LA officers.

In contrast, settings perceived to be inappropriate for RA use were where:

- the information received from FBOs remotely was not trusted to be accurate,
- the potential risk to public health of missing problems within a certain business was deemed high, or
- the inconvenience of working with a given food business was considered to outweigh the benefits of doing intervention work remotely.

Inappropriate RA settings mentioned were generally those in which the limitations of RA work perceived by officers – such as vulnerability to FBO deception, being practically inconvenient for officers or restricting their view of business premises (discussed further in Section 2.3.2) – most endangered inspections, and therefore public health.

2.1.4.1 Assessment accuracy

The LAs interviewed explained that the most appropriate contexts for remote work were those where officers had particular reason to trust that information (e.g. documents or verbal feedback) provided by FBOs was accurate. Examples given of appropriate contexts (section 2.2.1 discusses the enabling factors for RAs) were where:

- food businesses had consistent long-term compliance ratings, giving LAs confidence about them continuing to comply (independently mentioned by 4/20), or
- officers and FBOs had an established relationship and had built trust over time, giving LAs confidence in the honesty of information FBOs provided (raised independently by 5/20).

One officer explained how he felt that information which familiar businesses with good compliance histories provided could be trusted, meaning they were less concerned about FBOs concealing/falsifying evidence conveyed via emails or on the phone.

Five of the 11 LAs interviewed who were doing both hygiene and standards assessments, mentioned that standards assessments worked better than hygiene

did remotely. One officer explained that, because standards inspections focus on more 'static' matters, that can be assessed accurately at a distance, these interventions were 'less open to abuse' than hygiene work, summarising that for most factors 'it's either there or it's not'. Another went on to suggest that conducting assessments conventionally (as unannounced spot checks rather than as appointment-based visits) was less important for standards than for hygiene work, as these interventions normally looked at menus, ingredients lists, additives, colourings etc, which could not be changed or hidden easily by FBOs. Seven out of the interviewees (all of whom were involved in standards work) mentioned that they felt standards inspection contexts were more appropriate for RAs.

Four of the LAs working on food standards explained that RAs had worked well where third party datapoints (such as pest control reports, records of production, ingredients traceability records and records of ingredients purchased) were available, because having this additional information improved LA officers' confidence in assessments made remotely. 'Triangulating' third party evidence, to either support or contradict officers' analysis, was considered particularly useful by standards inspectors for reinforcing confidence in the RA. Larger or chain organisations (mentioned directly by half of all LAs interviewed) tended to have these pest control contracts or primary authority relationships, meaning third party auditing evidence could be supplied most reliably to LAs by them to supplement RAs – hence, inspecting larger organisations remotely was also associated with a higher level of confidence.

2.1.4.2 Low public health risk

Ten of the LAs interviewed mentioned low-risk food businesses as appropriate settings for carrying out a RA. This was because the potential public health risk posed (if problems with food quality or safety were to be missed) would be less serious for these businesses than in higher risk premises⁸. This perspective aligned with five additional LAs highlighting that high-risk premises were inappropriate, due to their contrasting greater associated risk⁹. This consideration was especially important for LAs using RAs to assess whether onsite visits could be delayed (to limit contact or reduce workload), as they would have no opportunity to verify remote findings onsite.

Specifically, LAs mentioned that examples of these low risk businesses deemed more suitable for assessing remotely with an eye to postponing visits included:

- newsagents/chemists (stocking small amounts of pre-packaged confectionary),
- playgroups (serving pre-prepared snack foods),
- non-food retailers (supplying token snack foods, for example near tills), and
- home bakers (supplying baked goods such as cakes or 'heated up sausage rolls').

⁸ Three LAs explained these were business contexts where they would have considered using Alternative Enforcement Strategy (AES) before, working with food businesses categorised as low risk. In accordance with the Food Law Code of Practice, this was where 'inherent hazards [in a given business setting] are not significant by virtue of their trading activities or the number of consumers they supply' (Food Law Code of Practice).

⁹ Perception on the appropriateness of doing RAs in high-risk businesses varied between the remaining 15 LAs. It depended on how these LAs prioritised work during the Covid-19 pandemic, and on the type of official controls that they were using RAs for.

Officers noted, however, that inspecting these lower-risk premises had been non-priority during the pandemic (in accordance with FSA advice to prioritise work in high-to-medium-risk premises). The extent of the appropriateness and usefulness of RAs for interventions in these low-to-medium-risk category premises has therefore not been fully explored yet by LAs.

Some LAs also said conducting RAs without visiting premises in the short term could be preferable from a public health perspective, for example for interventions in hospitals or school kitchens. They expressed that it was important to weigh up the food-related risks posed by businesses who are 'generally consistently compliant and low risk' against the risks potentially created by visiting them if they serve a particularly vulnerable clientele to Covid-19.

2.1.4.3 Convenience

To minimise time required to engage businesses for RA work (another key limitation discussed in Section 2.3.2), almost half of the LAs interviewed (9/20) raised independently that RAs worked best where they could guarantee FBOs would be easily capable of engaging with them. Most LAs perceived FBO technology and language skills to be key for RAs to work (as discussed in Section 2.2.1).

Several LAs raised that they would prioritise working with FBOs that already had e-documents, operated in certain sectors (e.g. hospitals or schools), or were part of larger chain organisations too, because (in addition to anticipating greater accuracy of assessments made in these premises) the practical costs and benefits of actually conducting work remotely factored into which contexts they prioritised.

2.1.4.4 Inappropriate contexts

Figure 2.4 shows that most of the inappropriate examples provided related to where RAs were deemed to be limited, owing to businesses' operations or to their FBOs' characteristics.

Figure 2.4 Number of times that contexts were raised independently by LA officers as 'inappropriate' for conducting a RA



Examples of inappropriate contexts to conduct a RA, as mentioned by LAs on the basis of RAs being practically inconvenient, included:

- takeaways (whose FBOs often speak limited English), and
- butchers or other small independent businesses (that tend to have non-electronic records and have only one staff member onsite, struggling to meet administrative requirements).

2.2 Enablers and barriers to implementing remote assessments

This section explores the perceived enabling factors and barriers to implementing RAs, as discussed by the LAs.

2.2.1 Enablers

LAs reported enabling factors to using RAs successfully. These were related to FBOs characteristics, and officers' skills (and were generally opposite to those considered as barriers, see subsection below).

In terms of FBOs, LAs highlighted some factors which enabled assessments to be made confidently and accurately from a distance:

- having longstanding relationships with FBOs, due to having low business turnover rates, making FBOs receptive to cooperating with them (raised by 5 LAs),
- having FBOs that speak and read English as well as being technologically competent, and
- officers having certain skills and attitudes (raised by 10 LAs). Examples given included officers:
 - having comprehensive local knowledge (mentioned by 2 LAs), for deciding which FBOs to approach for RA work,
 - being willing and having experience and ability to use professional judgement to do work (raised by 6 LAs), and
 - having leadership skills such as feeling comfortable directing FBOs over video camera and being authoritative in pushing FBOs for information they have not offered (raised by 6 LAs).

2.2.2 Barriers

LAs discussed three types of barrier to carrying out RAs: (i) FBOs' characteristics, (ii) LAs' resourcing capacity, and (iii) officers' willingness or skills to carry out RAs.

LAs mentioned that encountering the following food business characteristics made RAs more difficult to carry out in some contexts:

- non-English speaking FBOs, who struggle to communicate verbally without face-to-face cues (independently referenced by 7 LAs),
- lower engagement with technology among local people, relating to age and/or income profiles (mentioned by 2 LAs),

- high turnover of business ownership (raised by 1 LA). One officer from a London Borough said, *'it's 'tougher in London'*, describing how *'rapid local business churn rates'* create a high burden of new and unfamiliar registrations, requiring ratings and advice-giving, without officers' having the confidence of past experiences with businesses to draw on, and
- remote situation of businesses in areas with poor connectivity (mentioned by 1 LA).

A lack of LA resources and staff was also mentioned on 14 occasions as a barrier to remote work, particularly in relation to Covid-19 redeployment, and examples given included:

- not having business accounts or technology access required (raised by 4 LAs).
One LA mentioned that increased demand for remote council resources during the pandemic had resulted in redistribution of account access to prioritise social services work, meaning they could not use the video platform they wanted. Others mentioned not having the funding per se to access internet-enabled work phones for example
- having reduced staff (due to redeployment for Covid-19 business closures, street patrols, outbreak investigations and helping with track and trace work) for updating guidance, setting up systems and monitoring and performing remote work (raised by 7 LAs). Teams who were already small (in terms of number of staff) struggled particularly with redeployment of officers to other areas of work. One interviewee explained:

"I have various responsibilities... with Covid-19, the number of noise complaints we have received has tripled. Priorities for staff resourcing include, to an extent, being visible and addressing politically relevant issues. People from food businesses won't complain if they don't get a food inspection, people will complain... if they make a noise complaint which is not responded to... We have re-jigged services based on need."

A handful of LAs mentioned that some of their individual officers were not as effective as they had expected when working remotely where:

- officers had been uncertain about where to use RAs, how to approach businesses and what channels to use to engage FBOs. Two lead food officers (LFOs) expressed that their officers had been less effective than they could have in implementing RAs because they felt advice on how to implement them had been unclear.

One officer reported that staff on his team had been *'uncertain and not so empowered to use judgement'*, in deciding which businesses to approach for RAs, due to advice being non-specific, and

- RAs were not perceived as outcomes on their own, but rather as additional work by some officers.

Three LFOs perceived a lack of motivation to use RAs among their officers to be because of not having a distinct LAEMS code to log work under. LFOs explained that officers were less inclined to complete RAs as it would not 'tally up on the official side' as a key performance indicator (KPI). One officer explained that inputting data on work done locally to the national LAEMS system encourages officers to prioritise focusing on the indicators it tracks in their day-to-day work (like numbers of interventions, audits and staff) over work such as RA which was not recorded.

Box 2.2 below describes FBOs' experiences with RA in terms of enablers and barriers.

Box 2.2 Enablers and barriers for food businesses

One FBO said cooperating with a video inspection had been easier for them because they had closed to walk-in customers during the pandemic, but that 'it would be a different story if [they were] still open and busy'. Because customers would not want to be filmed, the FBO anticipated the business having to close temporarily to cooperate.

The FBO who received a standards inspection felt they had benefited from being used to receiving audit inspections, given the nature of their (meat processing) operations. They reflected that having prior 'understanding and trust between both parties' had also enabled their inspector to have confidence in the authenticity of information they had supplied, explaining that the process had worked well because, 'we know our auditors, it's a personal thing'.

2.3 Benefits and limitations of using remote assessments

LAs reported similar benefits and limitations of RAs, reflecting a degree of consistency in experiences of RA use. Benefits and limitations raised by LAs related to:

- Covid-19 specific factors,
- quality of the assessment, or
- LA officers' experiences and convenience.

2.3.1 Benefits

The main benefit for LAs was the fact that RAs enabled them to continue their work to some extent during the Covid-19 pandemic (mentioned by 15 LAs).

Other benefits related to increased ease in conducting food controls, as pre-scheduling remote appointments – as opposed to making unannounced visits – gave FBOs the opportunity to prepare for visits (mentioned by 6 LAs). This allowed inspections to run smoother and reportedly improved the detail of information retrieved. LAs explained that, when RAs were completed in conjunction with site visits, benefits included gaining:

- an opportunity to assess the confidence of FBO management in the inspections (e.g. checking if verbal responses were consistent with findings at premises),
- a more structured and purposeful conversation with FBOs (e.g. using prompts/questionnaires over the phone, without having onsite distractions),
- space to scrutinise written documents properly without having FBOs, as one officer put it, 'looking over the shoulder' (e-documents could be worked through in privacy, for example, to prioritise what to examine onsite), and
- opportunity to postpone visits to some premises, to prioritise the most urgent work (reducing time spent with the low-risk establishments)

'Enabling our team to identify and postpone making visits to the low risk to prioritise time doing onsite work effectively. We have around 2.5k businesses that we regulate in total and we have some proper criminal

enterprises amongst that (involved in sexual exploitation, drugs etc.) but [we also have] 'worried well' at other end of spectrum, who want more visits and to talk through everything, where the reality of risk is very low'.

Advantages of remote work in terms of convenience for officers were also mentioned, including:

- improved mobility of officers between shared LA services (raised by 2 LAs),
- LA officer travel time savings made by postponing visits (mentioned by 4 LAs, all of whom were smaller in number of full-time equivalent personnel),
- LA officers being able to work remotely from home (raised by 2 officers), and
- opportunities arising to train new officers to do inspections (raised by 1).

2.3.2 Limitations

LAs identified various limitations when using RAs, relating both to the quality of the assessment and to the convenience for officers.

LAs identified limitations in terms of the accuracy of work carried out remotely, such as:

- RAs providing an opportunity for FBOs to falsify/conceal issues in preparation for site visits by FBOs being pre-warned (raised by 11 LAs, 5 of whom felt FHRS scores awarded in pre-arranged visits had been inflated artificially),
- likelihood of not identifying all the problems with FBOs during a RA (identified by 8 LAs, 3 of whom had observed inconsistency during later site visits with evidence FBOs gave remotely),
- inability to use instincts/sensory awareness (mentioned by 5 LAs) to assess FBOs during a RA (e.g. loss of smell to detect pests, inability to observe FBO body language/eye contact, and being unable to see how staff interact with each other),
- difficulty controlling the type of evidence FBOs send to LAs, as FBOs become 'gatekeepers' of information (loss of officer control was mentioned by 4 LAs as a limitation, one of whom explained, *'I feel uneasy that RAs give the power to the food business for it [the assessment] to be on their terms'*), and
- three LAs raised that FBOs could be negatively misrepresented in a RA if, for example, a staff member without sufficient knowledge of a certain procedure answered the phone to an inspector. As some assessment aspects were performed remotely to save time onsite, misrepresentation of businesses could cause them to achieve worse results overall, without input on some matters being given by the relevant points of contact.

Most officers also expressed that the overall time spent doing inspection work had increased since they started using RAs in conjunction with onsite inspections (raised by 11 LAs, and implied by the remaining 7), as they now had to:

- do additional administrative work (e.g. gathering and locating up-to-date FBO contact details),
- chase FBOs who did not respond to outreach (e.g. who deliberately ignored calls or emails, or who said they were too busy – one officer said, *'a lot of our businesses will put the phone down if they know who you are'*),
- wait for FBOs to provide the correct documents,

- have '*long-winded back and forth email explanations*' with FBOs and other LA staff who struggle with technology, about what is required and how to send it,
- tease out information from FBOs who do not offer it willingly during a RA, through direction and conversation (one officer explained that '*the FBO tells you what they think you want to hear – they won't say that it's filthy under the cooker, so getting to the truth could be a slow process*'), and
- five LAs expressed that not being able to rate or re-rate businesses based on remote work alone was perceived by some officers on their teams as a limitation of using RAs. Inability to use RAs on their own to clear rating backlogs and to fulfil re-rating requests had made some officers reluctant to devote their time to it, as they would still be required to go onsite to complete work, taking longer overall than if they had just visited businesses.

Box 2.3 below examines the benefits and limitations perceived by FBOs that had experienced a RA.

Box 2.3 Benefits and limitations for food businesses

The two FBOs interviewed had different perceptions about the RAs they had received (FBO characteristics are discussed in section 1.3.2) that had been carried out by two different LAs.

The feedback given was around two topics; the interactions between LA officers and food business staff, and the assessment outcomes themselves.

RA interactions

Reflecting on what worked well for them when interacting with inspectors during their remote inspections, FBOs reported various benefits, such as:

- not being confused by needing to find documents '*on the hoof*', like they sometimes did during inspections (due to having the opportunity to prepare),
- having inspectors onsite for less time than they had been on other occasions,
- not feeling intimidated by LA officers (one of the FBOs said '*officers could act like police officers when they come to premises unannounced*'),
- service not being interrupted, because assessments were pre-scheduled,
- finding remote questioning more balanced and structured than previous onsite discussions had been (one FBO thought this was because questions they were asked had been more direct and because they did not get distracted walking around premises), and
- having the opportunity to chat to officers on an ongoing basis and ask them questions over email.

Limitations of RA interactions perceived by FBOs included:

- the administration and time burden of locating and scanning required documents, and needing to fill in additional forms (which one FBO said added an estimated 25-30% to time devoted to inspections, compared to having a conventional site visit),
- frustration and inconvenience experienced by businesses who were not tech-literate or did not have access to accounts and/or devices, and

- The loss of regular informal interaction between FBOs and LA officers during site visits, for passively building trust/relations and for enabling FBOs to ask advice casually. One of the FBOs explained that, although they could still approach LAs with questions, *'we learn [with] every audit and try to improve our systems each time'*, but that with the RA, *'we missed our expertise'*.

Assessment outcomes

FBOs highlighted that RAs could improve businesses' assessment outcomes by enabling them to achieve better results (such as higher FHRS scores). Because FBOs were pre-warned about visits, they had an opportunity to prepare for them, and to potentially improve their premises before the visit. Both FBOs said that they had used the pre-warning themselves as an opportunity to prepare paperwork (and for one, to complete unfinished structural works), in time for the inspection.

2.3.3 Benefits and limitations by type of LA

The types of benefits and limitations discussed differed in accordance with LAs' characteristics. As discussed below, outcomes differences varied:

- **By total number of staff members working on food controls in the LA**

LAs with larger teams (more than 7 staff) expressed more concerns about the length and quality of the assessments versus the LAs with smaller team (less than 4 staff). All of the LAs (five) with larger numbers of staff highlighted the capacity for FBOs to deceive officers during RAs as a potential risk.

- **By type of assessment completed (hygiene or standards)**

LAs working with food hygiene-only controls perceived RAs to have more limitations than those working with food standards. As discussed in Section 2.1.4.2, LAs doing both hygiene and standards assessments found it more challenging to assess food hygiene remotely. One officer explained how, upon re-visiting a butcher who they had deemed to be operating satisfactorily during a remote check-in, several cleanliness problems were identified which had not been picked up via phone calls or through images which the FBO had shared. Another LA reported similarly that there had been various incidences where FBO claims made during remote check-ins (conducted via phone calls) had not 'tallied up' with what they saw in onsite follow-up visits.

- **By whether or not LAs were using RAs**

LAs that did not use RAs, because they had stopped (3/20) or they had never used them (2/20), mentioned the lack of accuracy of assessments completed as the main limitation. Three of the four officers interviewed expressed a distrust in RA, and said they felt *'nothing beats face to face'*.

These LAs explained that not engaging physically with FBOs was the main weakness of RAs, one expanding that they worried *'big things'* such as mouse infestations could be easily missed, even on camera. Inability to exercise intuition – such as knowing where to look, identifying signals and smells, and reading FBOs' body language – was also a reservation LAs had, and discomfort about losing the authority which officers would usually command onsite was also expressed by them. One also felt that doing some interventions remotely risked undermining food business inspections in the public eye.

3 Lessons learned and future implications for remote assessment use

3.1 Best practices

LAs shared learning, from experiences of implementation, about which strategies for conducting RA had worked best in practice.

These were techniques for maximising the accuracy and the convenience of remote intervention work (to reduce exposure to RAs’ perceived limitations, as in Section 2.3.2) and leveraging new opportunities afforded by assessing businesses remotely, as well as for ensuring consistency in approaches between officers and authorities. Best practices are shown in Table 3.1, Table 3.2 and Table 3.3.

Table 3.1 Best practices for overcoming limitations from RA

Limitation	Best practice
Minimising the risk of FBOs concealing or falsifying information	<ul style="list-style-type: none"> ■ blending periodic visits with routine remote check-ins to maintain FBO incentive for upholding compliance, ■ prioritising use of RA in FBO contexts where visits would not be unannounced anyway (i.e. for home caterers), ■ prioritising use of RA for official control purposes which do not benefit significantly from being made unannounced (such as for enforcement revisits (8/20), and advice-giving (5/20), and ■ not using RA to respond to perform urgent reactive work (raised by 5 LAs) where a significant risk is posed to public health (and site access is feasible without significant Covid-19 risk).
Minimising administration time	<ul style="list-style-type: none"> ■ sending out information about requirements and circumstantial arrangements prior to making live contact with FBOs, ■ sending out opt-in invitations for FBOs to sign up to participate remotely, ■ utilising third-party software which runs the necessary software checks for FBOs automatically to ensure they are prepared for participating, ■ providing in-person drop off points for FBOs without e-documents/scanners to supply hard copies for LA analysis, and ■ not approaching some FBOs to do RA (i.e. prioritising them for visiting onsite) if there is reason to suspect they would struggle to cooperate with technology or communication requirements without major difficulty.
Maximising the quality and thoroughness of information that can be obtained via RA	<ul style="list-style-type: none"> ■ postal sampling using a covert payment card for anonymous ordering to verify ingredients, allergens etc, ■ using publicly available websites and reviews to check that information supplied by FBOs ‘tallies up’,

Limitation	Best practice
	<ul style="list-style-type: none"> ■ requesting third party audit information where FBOs have had inspections or have primary authority relationships to increase remote data points, ■ asking FBOs to demonstrate practices during video conference calls (for example, one LA said they had observed temperature monitoring over video), and ■ taking authoritative verbal control of video tours to ensure that FBOs direct the camera appropriately where evidence is not directly offered up by FBOs.

Table 3.2 Best practices for leveraging RA benefits

Benefit	Best practice
Utilising RA for protection against Covid-19 risk	<ul style="list-style-type: none"> ■ prioritising RA use (and delaying site visits) in settings where FBOs or their clients are particularly vulnerable (i.e. care homes).
Leveraging new opportunities for assessing food businesses	<ul style="list-style-type: none"> ■ having two contact points (remote and physical) to assess management confidence, through checking verbal responses tally up with physical conditions, ■ establishing ongoing remote contact habitually to build rapport with FBOs which LAs did not speak to previously outside of inspections (encouraging them to ask questions proactively like they might during visits), and ■ using RA as a more thorough alternative to self-assessment in applicable lower risk food businesses, to do virtual tours and engagements.

Some LAs introduced practices to maximise consistency across work done by their officers when conducting RAs too, as shown in Table 3.3.

Table 3.3 Best practices to maximise consistency across RA work completed

Best practice
<p>Eight LAs also introduced new in-house guidance (or adapted old support documents) to guide officers:</p> <ul style="list-style-type: none"> ■ defining which inspection contexts are appropriate for RA (specifying how factors such as first language, FBO relationship and compliance history should be considered), ■ developing new processes for contacting businesses (specifying template text for contacting FBOs and outlining which documents to request), and

- providing scripts or prompts for officers to use during RA when interacting with FBOs (ensuring that remote engagements were both targeted and consistent between officers).

Four LAs started to have **verbal support and check-ins with their teams** to monitor officers' work (also encouraging decisions about RA strategies to be shared and critiqued to increase consistency via feedback).

Six LAs **sent out standardised information to FBOs prior to making direct contact** with them for inspections (ensuring they each received the same brief, to maximise the level playing field in terms of preparedness across businesses).

One LA **assigned RA duty to just one officer** (meaning FBO selection and engagement was performed by the same individual, to ensure internal consistency in approach, based on referrals by the rest of the team).

LAs working with hygiene and food standards developed different practices, as described in Box 3.1.

Box 3.1 Hygiene and standards best practices

LAs used different techniques to conduct RAs depending on the type of assessment being conducted (e.g. food standards or hygiene assessments).

Standards-only authorities used wider sources of information to supplement evidence retrieved in RA, such as triangulating findings, using third party audit reports and postal sampling (as mentioned in Section 2.1.4.1) to cross-check verbal feedback given by FBOs.

Best practices for LAs doing hygiene work, however, related more to improving the information exchanged with FBOs *directly*, during RAs. LAs identified ways to make the RA more similar to their conventional unannounced onsite inspection work, therefore, for example by:

- calling FBOs shortly before arriving onsite to ask Covid-19 questions and perform RA components (limiting FBO opportunity to prepare by being somewhat unannounced), and
- conducting remote work with FBO premises in sight (to verify verbal information through distanced observation).

One LA approached RA work by inviting all FBOs they deemed eligible for a RA using a mass email, but considered the approach to have been unsuccessful, as shown in Box 3.2.

Box 3.2 Approaching FBOs by invitation

One LFO explained that, rather than selecting FBOs individually to engage remotely, they approached businesses instead by emailing out a mass invitation to participate in remote video inspections to 128 FBO contacts. Anticipating that some FBOs would struggle to cooperate with the technology required for RA, they believed this approach would (as they put it) 'weed out' businesses for whom cooperating would be difficult, meaning they could target RA at the remaining businesses who were more able to (e.g. because they had access to technology

and e-documents and were comfortable with the remote format). The process went as follows:

- 128 FBOs were emailed to explain what the required video-conferencing access and e-document provision would be,
- 60-70% of these FBOs did not respond to invites (presumably because they were unwilling or unable to partake) and 12 emails bounced back straight away (having been sent to the wrong address), and
- of the 32 who agreed initially, only 6-10 completed video assessments (meaning a further subset dropped out).

The LA team reflected that the lengths they had gone to – to identify appropriate businesses, gather up-to-date contacts and then disseminate information – had not been worth their time. The team expressed also that the willingness to cooperate shown by these select few also negated the benefits of inspection work, because:

- cooperation with remote verification work came disproportionately from non-priority FBOs with existing 5 ratings (rolling over their pre-existing 'outstanding' statuses for longer), and
- less compliant FBOs seeking re-ratings were not incentivised to cooperate when invited to trial RA, because they perceived that they would not benefit from it, being unable to improve their scores without having an onsite visit anyway to improve (in accordance with FSA advice on FHRS re-rating).

The LA reflected that the process had revealed to them that cooperating proactively in inspection work was not a priority for over-burdened businesses (as many had been during the pandemic). They explained feeling that taking less of an invitational approach to contacting food businesses could be better for using RA to support priority intervention work in the future.

3.2 Further guidance and support

Most LAs considered FSA advice to date on the use of RAs to have been useful, but in relation to difficulties faced and opportunities they foresaw, LAs identified further ways in which advice could be extended, to support useful and impactful utilisation. These ideas, alongside the findings presented throughout, can inform FSA thinking therefore about remote work going forward.

Guidance sought by LAs related to developing:

- **Practical specification of where and how to conduct RAs** (in relation to avoiding the problems they encountered and overcoming barriers they faced, detailed in Sections 2.3.2 and 2.2.1), including specifically:
 - definitive instruction on where *not* to implement remote techniques (raised by 3 LAs). One officer said:
'[FSA] would need to have guidance as to when it would be okay to use it... [for example] it's 'okay if it's a structural matter and the officer knows the premises, [but, a RA] wouldn't work for hygiene matters, except for something like asking to see the dial of the walk in chiller or something',
 - a clear definition of which channels and engagements constitute a RA (suggested by 2/20). One officer said, 'there needs to be some rigorous guidance on what constitutes a remote assessment and what it's allowed to tell you',

- clear case-by-case guidance on what success should look like in a given context (2/20),
specification of practical requirements to ensure work done locally is consistent nationally (2/20). Improving consistency was important for LAs because, if neighbouring authorities adopted different approaches, this could undermine the level playing field for food businesses and have negative unintended consequences,
 - standards-specific differentiation of advice (requested by 3/20),
 - support and advice for administrative management relating to RA (e.g. advising on how to cope with additional scheduling and IT communication demands), and
 - practice and information sharing to support LAs in learning from their peers about RA.
- **Centralised FSA coding** to record RA work distinctly (raised by 7 LAs), to measure (and therefore incentivise) officers' work/performance, even if re-rating remotely is not allowed (to overcome motivational barriers discussed in Section 2.2.1). One officer said:
- 'if you're not looking at key performance indicators on LAEMS, doing RA work actually is time-saving from the perspective of purely minimising risk' - implying that not being credited for RA can undermine its value for officers seeking quantified results.*
- **Freedom and flexibility for LAs** to determine how they implement RAs (requested by 6 LAs, who disagreed with those seeking further practical specification, on the grounds that they felt best practices and appropriate settings were case-dependent),
- four LAs mentioned wanting greater endorsement of professional judgement-making by officers to be given to encourage them, instead of creating longwinded prescriptive guidance, and
 - one LA suggested that guidance should be more outcomes than practice-oriented, to encourage officers to rely less on guidance to tailor localised approaches (e.g. to choose which FBOs to target for RA and how to approach them) and more based on intuition and experience.

4 Conclusions

This study explores the use of remote techniques to perform food hygiene and standards inspections across England, Wales, and Northern Ireland, following the onset of the Covid-19 pandemic. The study consisted of 20 semi-structured interviews with different types of LA, and 2 interviews with food business representatives. The report brings together a diversity of experiences and perceptions about how using RA has worked in practice.

LAs, in their majority, followed FSA advice regarding how and when to use RAs. They mostly used them to target onsite work better, reducing time spent by officers on business premises (by covering some inspection aspects during a RA conducted prior to onsite visiting), or to postpone routine premises visits altogether for certain businesses (e.g. to those with consistent compliance histories, or new businesses considered likely to be very low risk).

To carry out RAs, LAs largely used phone calls and email exchanges with food businesses, although a smaller number found that using more specialist technology and videoconferencing could work successfully. LAs perceived that the best contexts to carry out RAs were where officers could be confident in the accuracy of assessments made remotely (because they trusted the FBO, or because information could be easily gathered remotely), and accordingly favoured using RA for food standards versus food hygiene inspections (as standards indicators were similarly easier to evaluate offsite). RAs were also considered to be useful when the types of businesses assessed posed a low public health risk, and when LAs expected that benefits of doing RAs would outweigh the time they invested, feeding into a broader narrative expressed by LAs about weighing up the risks of RA against convenience benefits in each context.

Contextual barriers to doing remote work raised by officers were often food business related factors (such as access to technology, language skills, trust in the business, ease of reach). LAs mentioned also that they need to have enough competent staff to carry out RAs. Familiarity and trust between LAs and local businesses, and skills and attitudes amongst LA officers were also flagged as important RA facilitators.

In terms of benefits and limitations, the accuracy of assessments made remotely was a key concern raised by most of the LAs. Officers feared that information was vulnerable to manipulation by FBOs and that problems could be missed doing RA, resulting in public health risks accordingly. The end-to-end time cost of implementing new RA systems and then approaching and exchanging information with food businesses remotely was another limitation.

All LAs who had done remote work agreed, however, that RAs had been useful for enabling work to continue safely during the Covid-19 pandemic, as well as for aiding them to prioritise making visits in the most urgent cases.

In cases where LAs had managed to make best use of RAs, additional new opportunities for assessing businesses in different ways had been discovered through exploring new remote practices. Whilst many of the specific best practices shared by LAs related to their local circumstances (i.e. their resources, inspection focuses or local business environments), there were some general lessons mentioned by LAs too.

Best practices raised, generally aimed to minimise the food safety risks and time costs they considered key limitations, such as prioritising RA use for food standards work, advising about documents and technological capabilities required from them, triangulating evidence (e.g. third party audit reports) and sharing findings among

officers. They also sought to leverage aspects they felt were RA benefits, for example by focusing on clientele vulnerable to Covid-19 (e.g. in care homes), instigating new FBO conversations remotely and allowing officers to work from home to save travel time. To create a level playing field and continuity at local and national scales, assuming continuation of RA, best practices also included defining new LA advice and standardised food business materials, as well as dedicating time to information sharing and feedback between officers and across neighbouring authorities.

Finally, LAs requested further advice from the FSA for enabling future extension of their work with RAs. This related on several occasions to perceived gaps in officers' experiences and weaknesses in their confidence embracing the new approach, which could be filled and enriched accordingly based on learnings identified in this report regarding best practices and appropriate RA use contexts. Reflecting on the contextual difference in experiences witnessed, practice-specific guidance on where and how best to work remotely, and structural validation (i.e. by being recognised distinctly in LAEMS) were sought from future FSA advice, as well as request from some more experienced officer teams for greater freedom to exercise judgement about approaches and priority contexts to generate the greatest possible benefits.

ANNEXES

Annex 1: List of LAs interviewed and key characteristics

Table 4.1 LA profiles listed by key sample selection characteristics

Type of LA	Country	Size (by FTE personnel)	Hygiene and/or standards focus	Currently using
County Council	England	Medium	Only food standards	Yes
County Council	England	Small	Only food standards	No, have stopped
County Council	England	Small	Only food standards	Yes
County Council	Wales	Small	Both food hygiene and food standards	Yes
District Council	England	Medium	Both food hygiene and food standards	No, have never
District Council	England	Small	Only food hygiene	Yes
District Council	England	Small	Only food hygiene	Yes
London Borough	England	Medium	Both food hygiene and food standards	Yes
London Borough	England	Medium	Both food hygiene and food standards	Yes
Metropolitan Borough Council	England	Medium	Both food hygiene and food standards	No, have stopped
Metropolitan Borough Council	England	Small	Both food hygiene and food standards	Yes
Northern Ireland	Northern Ireland	Large	Both food hygiene and food standards	Yes
Northern Ireland	Northern Ireland	Medium	Both food hygiene and food standards	Yes
Northern Ireland	Northern Ireland	Medium	Both food hygiene and food standards	Yes
Unitary	England	Large	Both food hygiene and food standards	No, have never
Unitary	England	Large	Both food hygiene and food standards	Yes
Unitary	England	Large	Only food hygiene	Yes
Unitary	England	Medium	Both food hygiene and food standards	Yes
Unitary	England	Medium	Only food hygiene	Yes
Unitary	Wales	Large	Both food hygiene and food standards	Yes

Annex 2: Topic guides

LA officer topic guide

Introduction

Thank you for agreeing to take part in this interview. We are interested in finding out more about your use of remote assessments and will use this information to provide feedback to the FSA on how remote assessments have been used, what benefits they have had and what limitations there are to their use. This interview forms part of a wider study on this topic that ICF is carrying out on behalf of the FSA. The interview is expected to last between 45 and 60 minutes, depending on your responses.

Your participation is voluntary and you do not have to answer any questions that you do not wish to. Your responses will not be attributed to you personally, but they will be reported on in relation to your Local Authority.

With your permission I will now start recording the interview. The recording will not be shared with the FSA and is only used to ensure we have an accurate record of your responses to support the analysis.

When, where, and why have remote assessments been used by LAs?

1. Could you please briefly introduce your use of remote assessments?
 - For what businesses and in what circumstances have they been used?
 - For which official control activities have remote assessments been prioritised?
 - How many have you conducted?

[If LA conducts both food hygiene and food standards inspections] How has the experience differed between using remote assessments for food hygiene and food standards inspections? [note: probe for this throughout if it is relevant]

What have been the benefits (including the impact on resources) to local authorities from using remote assessments? What have been the limitations?

2. How have remote assessments changed the way you deliver inspections?
3. What benefits has conducting remote assessments brought?
 - Has there been a positive impact on resources? (*probe in relation to pre-existing resource constraints – survey suggests that those that are already working with fewer resources are more likely to have stopped using RAs*)
 - To what extent has the use of remote assessments helped to reduce overall time spent on inspections? (*note that survey responses suggest that in many cases, it has led to increased time spent*)
 - What sort of additional costs have been associated with the implementation of remote assessments (e.g. cost of hardware, training of staff)?
 - Has there been a positive impact on relations with FBOs? (ask for examples)
 - For what purposes would you recommend the use of remote assessments? (ask for specific examples if possible)

- Have you used remote assessments as a basis for rating a business? If so, how have you verified the information provided in the remote assessment?

4. What have been the limitations of remote assessments?

- Prompt for those issues mentioned in the survey: IT issues, language barriers, problems contacting/engaging with FBOs (the ease of avoidance), time conflicts, resource concerns (e.g. RAs too resource intensive), concerns over validity of (Ask for examples)

What are the barriers and enablers to the implementation of remote assessments from a local authority perspective?

5. For the limitations mentioned, have you identified any solutions?

- For limitations not mentioned, but brought up by other LAs in the survey (prompt again for those listed above), why do you feel these have not been limitations in your case?

6. What has enabled you to make better use of remote assessments?

7. What is preventing you from making further use of remote assessments?

What technological capabilities are necessary to facilitate remote assessments?

8. What technical platforms have you used to carry out remote assessments?

- Have you found that certain platforms are more suitable than others? (probe for both video-conferencing platforms as well as document transfer platforms)
- Is there anything else in terms of IT infrastructure that has helped or hindered your ability to carry out remote assessments?

What are the good / best practices in the conduct of remote assessments? What are the limitations, barriers and perception of regulatory burden?

9. What works well when actually carrying out remote assessments? Have you identified any specific techniques or approaches? (ask for examples)

10. Are there any techniques or approaches that do not work well in the context of remote assessments? Which ones?

Is there a need for guidance on conduct of remote assessments to ensure a consistent approach to delivery?

11. Have you produced your own procedures or guidance for officers for conducting remote assessments?

12. Have you developed any procedures for monitoring the implementation of remote assessments (e.g. for consistency)? If so, how have you gone about this?

13. Would you benefit from additional guidance on conducting remote assessments?

- If yes, what points should such guidance cover?
- Based on your experience, what would be important for other Local Authorities to be aware of?

What has been the FBO experience of the remote assessments?

14. How do you feel the experience of remote assessments has been for FBOs?

- How does this compare to traditional inspections?
- Have remote assessments had an impact on regulatory burden for FBOs? If yes, in what ways?
- What differences are there between FBOs in this respect?

14. We are also planning to speak with FBOs directly regarding their experience of remote assessments. Would you be able to put us in contact with any of the FBOs who have undergone remote assessment in your local authority? We would be able to share some template text with you on the study, which you could then share with food businesses, who could then get in contact with us directly.

15. Would you be willing to be contacted again in future in relation to further research on remote assessments?

Thank you very much for your time.

FBO topic guide

Introduction

Thank you for agreeing to take part in this interview.

During the Covid –19 pandemic you were contacted to carry out a remote assessment of your food business. This remote assessment will have involved a telephone call or video conferencing call and sharing information with an officer, without a onsite visit to your premises. The Food Standards Agency (FSA), an independent government department which oversees local authorities' inspections of food businesses, are carrying out a study to receive feedback on local authorities' and food businesses' experience of remote assessments. The study is being carried out by ICF, an independent public policy research firm, on behalf of the FSA.

[The local authority] and the FSA appreciate the challenges faced by food businesses during this Covid-19 pandemic, so thank you again for your collaboration. We would like to speak with you about your experience with remote assessments, as a business that recently had one. We would like to understand, from your point of view, the positives and negatives of this approach. Your views will provide valuable information for the FSA when looking at ways in which local authorities carry out their work in the future.

We will only use your responses to compile a report of the findings for the FSA, but we won't name you or your business in this report. What you share today (or the fact that you participated) won't be passed on to either [the local authority] or the FSA.

The interview is voluntary, you do not have to answer any questions that you do not wish to. The interview will be brief (15-30 minutes). [Confirm the person is authorised to speak on behalf of the food business]

With your permission, we will record the interview so we can accurately capture your responses for the purpose of their report. Your participation and responses will only be seen by ICF and will not be shared with either the FSA or with [the local authority]. The recording will be deleted as soon as the project is complete.

1. I understand that you received a food hygiene / standards remote assessment during Covid-19.
 - Are you the person who took part in the remote assessment?
 - What is your role in the business? (*assess whether they are authorised to speak on behalf of the business → if not, end the conversation*)
2. Could you start by telling me a little bit about your business? Specifically [*Confirm the type of business – ask any follow ups to this if needed*]:
 - How many premises do you have? (probe for whether sole trader or franchise business, how many employees)
 - How long has your business been operational? How long have you been involved in the industry?
 - Does your business have an FHRS rating? If so, what is it? Has this changed following either the remote assessment or a follow-up inspection?
3. Could you talk me through what happened during the remote assessment?

Consider beforehand in conjunction with LA's reported style of inspection to save time and frame as 'we understand that you gave a (i.e. zoom tour of your café)'. Prompt for:

- What communication technology was used (i.e. phone call, skype, zoom)? How did you find this?
 - Were you required to share documents with [LA]? How was this done? (i.e. email, platform, physical) How did you find this?
 - How long did the remote assessment take? How did the time commitment compare to time needed for traditional inspections?
 - How was the interaction with [LA] during the Remote Assessment? Had you had any experience with the inspection officer beforehand?
 - [If new business and this was their first interaction with LA] Do you feel the Remote Assessment worked well as a first interaction with [LA]? Why/why not?
 - How many staff were involved in the process? How did they find this?
 - Was there a onsite visit conducted as a follow up? If so, how did you find this? (*probe for whether the remote assessment helped improve their overall experience with the LA/helped them to be better prepared for the onsite visit*)
4. In addition to the experience you have described, were there any [other] benefits to participating in a remote assessment? *Prompts: ease in communication, materials shared, capacity to prepare in advance, transparency, convenience to conduct a remote assessment whilst trading*
- Probe for broader overview – whether they feel their assessment would also apply for other businesses
5. In addition to the experience you have described, were there any [other] downsides to participating in a remote assessment? *Prompts: time wasted with back and forth emails/calls etc., technical problems (i.e. use of family email address, signal/wifi), language problems/frustrations, couldn't be re-rated (or listed e.g. on Just Eat if new), technical problems on officer end (i.e. they couldn't receive files sent by FBOs, didn't have whatsapp), security concerns e.g. data protection*
- Probe for broader overview – whether they feel their assessment would also apply for other businesses
6. Do you see value in LAs carrying out remote assessments before onsite physical inspection? Why/why not?
7. Can you think of anything which would have made the remote assessment better for you and your business?
8. Do you have any further comments or thoughts you would like to share on the use of remote assessments?
9. Would you be willing to be contacted again in future in relation to further research on remote assessments?

Thank you very much for your time.