



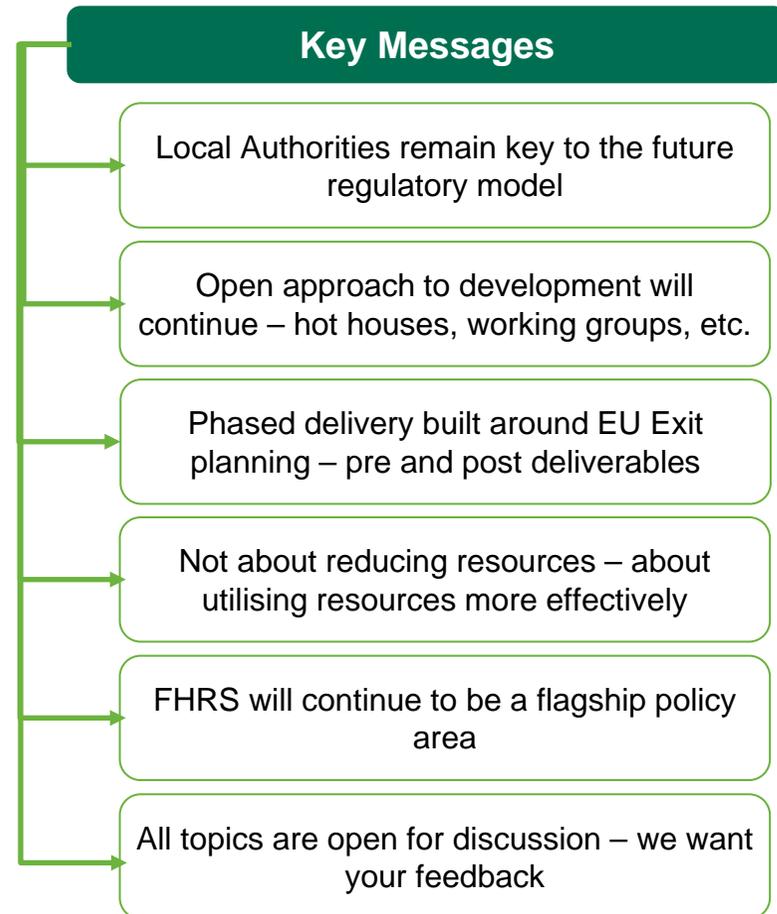
Regulating Our Future Programme

LA Engagement Workshops – Summary Output Document

1st August 2017

Context

- A series of workshops were held across England, Wales, and Northern Ireland to directly engage on the future operating model for food regulation with as broad a section of the Local Authorities as possible
- The focus was on obtaining specific feedback and input into key aspects of the future regulatory model, specifically in relation to Registration, Segmentation, National Inspection Strategies, and the Certified Regulatory Auditor concept
 - These aspects are still under development, and thoughts presented were not intended to be finished products
- Facilitated discussions were held in small breakout groups to collect stakeholder feedback during the workshops
- The presentation material used during the workshops is available, and should be viewed in conjunction with these documents
- This document is NOT intended to be a minuted record of all the discussions, but a summary of core themes



Broad themes

- Responses to potential changes to Enhanced Registration and Segmentation were relatively consistent across regions
 - Importance of data collection, updates, and integration widely recognised, and risk based allocation of resources was supported and already being pursued by individual LAs
 - A general desire for greater Incentive and Enforcement options was expressed – either through Permit to Trade or other methods
 - Broad agreement that certain groups should be segmented out of planned inspection regimes
- FHRs is a core programme that will need to be carefully considered and integrated into any changes
 - The data being collected should be utilised in the process, and any impacts to the ability to deliver the FHRs program (through reduced inspection, NIS, CRA, etc.) will need to be considered going forward
 - In Northern Ireland and Wales where there is mandatory display of FHRs score legislation, there were some significant differences on the regulated private assurance discussions
- The National Inspection Strategy is a potentially complicated process, and this is reflected in the wide variety of questions and comments collected during the workshops
 - Robust oversight and communications will be necessary – including ongoing education what it means today and in the future
- The Certified Regulatory Auditor concept received differing levels of support from region to region
 - When the law requires LAs to perform inspections for an FHRs rating, there is a recognised barrier to how the CRA concept could be implemented
 - Broadly, the concerns raised regarding the proposal were often similar, what tended to differ was the participants belief in the ability to manage the risks as well as value the quantifiable benefits the programme could bring
- *Note: Some documents – have been misplaced by TNT Shipment Services and will be incorporated into the development process when they are returned*
 - *The information collected in this document is a reflection of the wide range of comments and concerns raised by the LAs, and as such is not limited to direct answers to the questions asked*
 - *Given the specific concerns raised by Northern Ireland and Wales, region specific slides were included to highlight the messages from these LAs*

Session themes

Enhanced Registration

- Raise awareness of the need to, and benefits of, registration
- Integrate this process with other & data sources
- Consider more appropriate enforcement strategies
- Develop supporting incentive strategies
- Clarify who has to register (i.e. what is a food business)
- Establish links with intermediaries to capture new businesses earlier
- Develop a long term data update strategy
- Keep it simple: build on well developed best of breed

Segmentation

- Core criteria suggestions were relatively consistent
 - Compliance history, inherent risk, FHRS rating, etc.
- High level compliance indicators need to be clear
- The risk model will need to be carefully developed
- There are a number of open questions on how resourcing will be impacted at the LA level
- Continuous improvement in the risk modelling will be key
- A “trust but verify” mentality should be adopted
- Initial categories of low risk businesses can quickly be identified

National Inspection Strategy (NIS)

- Clear communication and transparency will be critical as this is a very complex process
- Draft criteria are good but can be improved
- The ability of local FBO management to follow national procedures/policies is a concern
- Consistency across schemes will be needed to build trust
- LA resourcing and continuity issues must be addressed
- Would like a continuous improvement process from both the regulator and the FBO to develop strategy over time
- Further work is needed to build confidence in the system

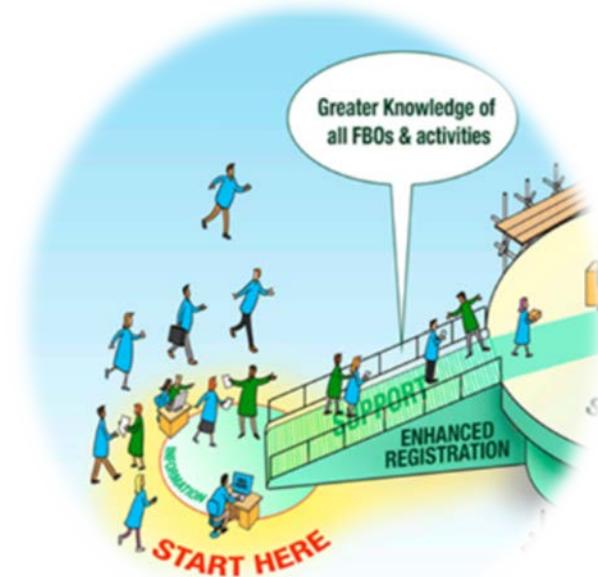
Certified Regulatory Auditor (CRA)

- Strong concerns about perceived conflicts of interest and independence
- Open questions about how oversight will be maintained
- Impact on LA resources is unknown but a concern
- Accreditation may be complicated to define & manage
- Questions on expected uptake from business community
- Development of a strong communications & appeals process will be necessary
- Enforcement risk and responsibility needs greater definition

Session Details

Enhanced Registration (ER)

- PTT is still very much on the table – will be dependant on success of ER and evaluation of research (post EU exit)
- New approach will be about capturing the right information at the right time and updating it over time
- Effective CCA oversight will enable more strategic risk management & regulatory decisions
- Provide additional support for new businesses to aid compliance
- Solution will be digitally driven
- Opportunity to strengthen the current registration system
 - Move away from 'One size fits all'
 - Incorporate appropriate checks and safeguards
 - Increase proportion of pro-active food business registrations
 - Increase flow of information to food regulators and with other regulatory systems if appropriate e.g. HMRC, Home Office, HSE
 - Increase sharing of food business registration information across LA boundaries



Questions Posed

- How can we capture new food businesses earlier?
- How could we encourage FBOs to advise us of any changes to operation?
- How can we create an environment which would encourage FBOs to register their food business earlier? e.g. use of current enforcement tools/communication campaigns/changes to COP

Enhanced Registration

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Raise awareness

- Consistent and strong statements that broader awareness of FBO responsibility to register is necessary
- Better use of social media and digital channels highlighted
 - Existing communications channels (e.g. website, twitter, etc.) could be improved
 - This is both for outward communication, but also for information gathering and monitoring activities
- Expand programs with trade and local publications
- Opportunities to learn from other groups should be integrated – registration campaigns are used across industries
- Recommend user research on why they don't register – additionally, data on if non-registration to establish if non registration is a problem

Enhance enforcement

- Limited or unused enforcement penalties for non-registration – LA's would like a better stick
- Fixed penalty notices were mentioned a number of times – prefer to have a ticketing process vs. a court case
- Change of ownership remains a critical risk – possibly take a deposit refunded at change of ownership
- If the LA discovers changes that the FBO should have updated, would like to have ability to penalise
- Permit to Trade is seen as a material change for the better
 - Linking to an amnesty program could smooth transition

Integrate with external bodies

- Business registration is not only an FSA problem, but a wider government challenge – how do we leverage the work of others?
- Would like to integrate with other governmental agencies (HMRC, VAT, Companies House, local planning agencies, business rates, Country specific, BBFA, DVLA model, etc.) to provide data
 - Creative integration with other government agencies / industry bodies could drive a broader assurance picture
- Partnerships with industry groups to collect data (insurance providers, review websites, food delivery, legal professionals, trade groups, accountants, banks, suppliers, landlords, etc.)
- If external partners see a commercial value in working with registered businesses, they may create a private push for registration

Develop incentives

- Positive incentives should be made core to the registration process – underpinned by better information and guidance for business start up
 - Monetary incentives could be considered but may create the wrong type of behaviour or perception
- Registration certificate or similar programme to create a PR benefit similar to FHRS
 - Potential to make mandatory prerequisite for FHRS in some regions
- How does proactive data updating get reflected in their assurance program – will there be an inspection benefit?
- Could we provide a “free” advice service to draw FBOs
- Development schemes to put FBOs on the path to FHRS 5 ratings

Enhanced Registration

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Clarify who registers

- A clear definition of what makes a Food Business Operator (FBO) is critical
 - E.G. Does a child minder making sandwiches need to register? What about the Church group down the street?
 - How does risk level figure in – less data disclosure at different levels or even does the need to register disappear?
- Should we expect registration of some degree for anyone that handles food - is our approach backed up by data?
- When a business registers is also key
 - Businesses who register but never operate create an overhead on the system

Data update management

- Needs to be a mindset change in FBO registration
 - Why isn't it thought of like HMRC or companies house (related to enforcement)
- Clear message that this is the responsibility of the FBO
- If data update is a core focus, then Awareness becomes a more critical issue
- Churn in data about FBOs has to be managed
 - Changes in ownership, food type, etc. all need to be tracked and businesses need to know what data should trigger an update
- Liability and enforcement need to be considered for businesses that don't update

Leverage local knowledge

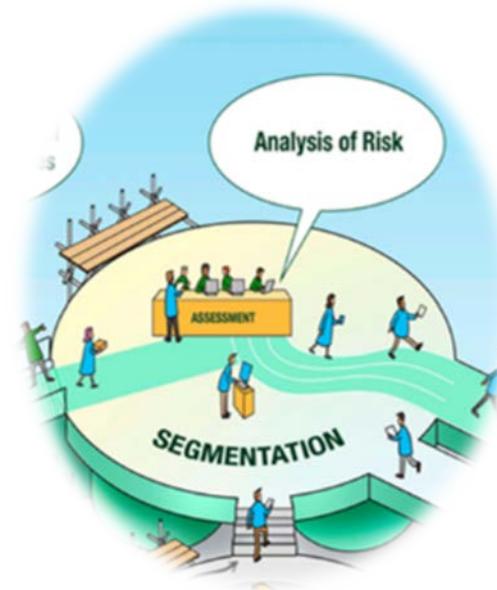
- LA data should continue to be a key source of information – how will this be integrated into the process?
- Local enforcement officers have a broader picture of the business – can we institutionalise this knowledge?
- How do we balance privacy and security concerns with data sharing needs?
- What lessons can be learned from LAs who are already piloting new programmes
- Consider working with registered FBOs to identify non-registered businesses – potential trust and perception issues

Design for simplicity & best of breed

- Permit To Trade consistently high on the priority list
 - Charging models and Sustainable Funding seen as core processes going forward
- Open question on how charging will impact registration
 - Legally mandated PTT may have a different impact than non-PTT charging
- In general this must be seen as something other than another regulatory burden – links to incentives but also ease of use will be critical (languages, etc.)
- Consistency in the registration process will be important – particularly within countries to avoid “post code lottery”, but also across countries
- It cannot be complicated, and must be proportionate to the business

Segmentation

- Intend to create a regulatory system with a more sophisticated method of segmenting businesses
 - Low risk may not have an active inspection programme
 - High risk may always be subject to inspection
 - Becomes a fundamental and ongoing process to help drive efficient allocation of resources and improve safety outcomes
- Develop a rules based system supported by statistical model
 - Correct identification of material risk drivers critical
 - Compliance history will be an important factor, but will need to work with LAs to improve risk ratings
- Development will be driven by certain key principles:
 - Iterative development
 - Ever increasing complexity
 - Ever larger number of data sources used
 - Working group of FSA, LAs, industry and other experts
 - LAs invite to trial this approach in the real world
- Focus is on driving improvements through the use of data and analytics – a supporting tool



Questions Posed

- If the segmentation approach was to take a business out of a planned inspection programme, what type of business should this be, and why?
- At what level of compliance should recognising sustained compliance be applied?

Segmentation

- If the segmentation approach was to take a business out of a planned inspection programme, what type of business should this be, and why?
- At what level of compliance should recognising sustained compliance be applied?

Core criteria to building a segmentation model

- Compliance history and clearly identified thresholds could be used to drive a reduced inspection regime
 - Long term history of sustained compliance before inspections are reduced – maybe 3 years or 3 inspection cycles?
- Important to have a continually updated understanding of inherent risk in business (i.e. food type / category)
- FHRs rating should be integrated into the risk model
 - What is impact on FHRs if we reduce or eliminate inspections?
- Clear, documented, demonstrable, and verified safety process
- Ownership changes are critical (maybe automatic risk change) but hard to track – how to manage?

Risk model development

- A data driven analytics programme must underpin the process
- Clear standards and criteria – open government and development process
- Open question on who “owns” the model and the data – where do industry resources / responsibility integrate (FOI impacts?)
- Concerns on how to retain / integrate human intelligence in model
- Will points model be developed and published – back to how is risk measured
- Hygiene & Standards issues should be treated separately
 - The risk models for each are potentially in conflict

Compliance indicators to segment on

- Scores below 5 on the FHRs scale could be considered red flags
 - Consensus that FHRs 3 was too low, but FHRs 4 may be ok
 - If this is used, how can businesses who have become compliant get checked again?
- Consumer complaints need to be collected and substantiated – from what sources and how are they weighted?
- Are there tertiary indicators of risk that can be used (i.e. linkage to HMRC compliance, Companies house, insurance, etc.)?
- Importers and producers will have different standards
 - How will risk models be clarified and communicated across differing business types?

Continuous improvements & updating

- Tracking risk variables will be key
 - Micro: change of owner / personnel, new processes, new suppliers
 - Macro: outbreaks, economic shifts
- Continuous horizon scanning and risk analysis will be necessary – how to monitor changes in risk drivers
- Onus should be on FBO to prove / retain recognition for sustained compliance
- Pilot programmes with LA should be run to test risk models as they are developed
- Can't “gold plate” – how to balance with compliance goals?

Segmentation

- If the segmentation approach was to take a business out of a planned inspection programme, what type of business should this be, and why?
- At what level of compliance should recognising sustained compliance be applied?

Trust but verify compliance

- An element of trust is mandatory – what happens if the trust is violated?
- Open question on how to confirm data submitted, and that updates are ongoing
- Can Big Businesses be segmented “out” – unlikely but perhaps do need different treatment
- Inspection model may need to shift – if we already only visit every few years how do you build up a data sheet on the business?
- More integration of technology into reporting – QR code or other tracking method consumers can check
- Consider implementing a bond / deposit if segmented out – what real and perceived risks could this create?

Resourcing impacts of segmentation

- Open questions on how resourcing at the LA level would be impacted – if inspection regimes are reduced are skills impacted?
- Where does the Primary Authority fit into the segmentation process?
- Is the LA responsible for collecting more data to support the analytics process & risk modelling?
- Understand how the changes in the Health & Safety regulatory regime have impacted resourcing, and how this may be reflected in food
- If visits to FBOs are reduced, will there be a loss in skills / intelligence more broadly?

Low risk categories to segment out

- General agreement that low risk businesses should be segmented out but that specifying these categories could be challenging
 - Caveat that low risk businesses serving vulnerable communities may need to be treated differently
- Limited impact FBO’s – cake decorators, small scale home businesses with small distribution, creches, breakfast clubs, after school clubs, churches, etc.
- Chemists, newsagents, small clubs, off licenses, food banks, A&S businesses, vending machines, Shelf stable / wrapped foods, national coffee chains, health supplements
- Fruit & veg, perhaps meat transport vans, bee keepers
- Large businesses with robust PA partnership may fall out as well

General

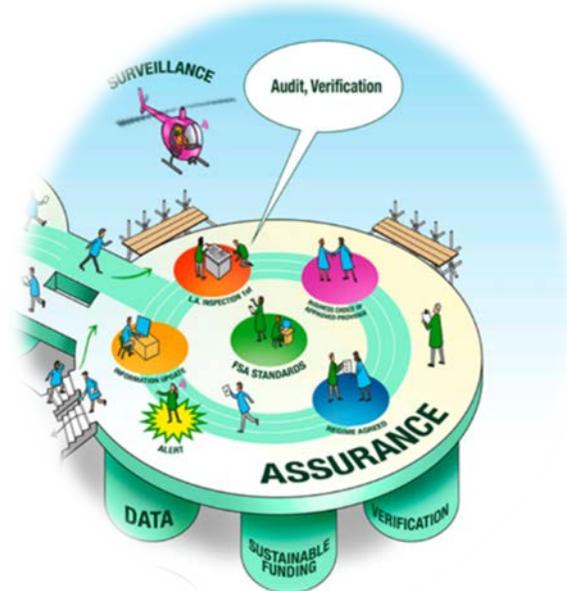
- How would a “certified competent person” role impact the assessment?
- Reference work already done in academic circles (King’s College, etc.)
- Need clear communications on who owns the risk if something goes wrong
- What can be taken from Trading Standards – risk / intel led model?

National Inspection Strategy (NIS)

- A Primary Authority National Inspection Strategy (NIS) enables the assessment of risk to be extended from a single site to a 'business-wide' assessment which takes account of a wide range of information
- FSA led a Primary Authority National Inspection Strategy Feasibility Study during January to May 2017 - this involved 8 primary authorities, their partners, and BEIS Regulatory Delivery
- The draft criteria developed through the study are:

<ul style="list-style-type: none"> • NIS appropriate for business type • PA demonstrates its competency • Business has food safety prerequisites in place • PA to have reviewed and issued advice on the food safety management system • PA have verified implementation of the food safety management system and elements as needed • PA to have reviewed and verified compliance history 	<ul style="list-style-type: none"> • Robust process for issuing PA Advice and overseeing compliance in the business is in place (e.g. data access, complaints, audits (1st, 2nd or 3rd party), sampling, feedback from regulators) • Business's own audit 'maps' to legislative requirements • Evidence that non-compliances are dealt with • Evidence of peer review or benchmarking
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- FSA will support a small number of partnerships to try NIS as a small scale 'pathfinder' (pilot)



Questions Posed

- What are your views on the draft criteria? Are we missing any? Are any unnecessary?
- "Primary authority demonstrates its competency", What do you think demonstrating this criteria should look like in practice?

National Inspection Strategy

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Clear communication & transparency

- Open development of standards for operation of NIS to ensure that all parties understand and agree on their roles
- How will LA's impacted by NIS be able to comment and provide feedback on the scheme and its implementation?
- Comprehensive list of complaints / issues across local branches will be rolled up along with LA reports
- Communication between PAs will be important – some have grown organically and / or better than others
- Provision / definition of tools for communication & data exchange will be a core service – appropriate responsible party will be identified
 - Potential to provide a central register of all NIS participants to support transparency across the process

Draft FSA criteria

- Audit criteria need specification & evidence – peer review may be important especially as initial programs are developed
 - Concern that LAs would be checking what FBOs want LAs to check, not what needs to be checked
- Proposed process needs to be robust – how do we confirm what is being reported is factual?
- How will consumer complaints at the LA level be fed back and incorporated into the NIS programme?
- Inspection strategy detail will need to be balanced and proportionate – could put people off if too prescriptive
- Desire more clarity on how it will cover both Hygiene and Standards
- Focus on evidence base – both for risk identification & outcomes

Local FBO management

- “The NIS is only as good as the manager in the store”
 - National standards are important but implementation can vary wildly in branches
- What guidelines will be developed to ensure that every branch is compliant and that variation across stores is managed?
 - Information flow from regulator to head office to local store needs to be effective
 - Information up that chain from local store, to head office to regulator need to work too
- Understanding the management structure of the business will be important to spot potential points of failure

Consistency in implementation

- FSA must be a strong CCA
 - Issue clear guidance to businesses to support NIS and also to ensure they take heed of advice
- Variation in strategies needs to be understood and clearly justified – cannot have a “post code lottery” with enforcement
- Will all LAs have the ability to monitor and enforce a NIS that may impact them – what will their responsibilities be?
- Transparency & consistency in costs will drive trust and take up
- Levels of service delivery will need to be clear – variable tiers may work but need to be delineated
 - This will need to be tailored to “business type”, but remain internally consistent across categories

National Inspection Strategy

- What are your views on the draft criteria? Are we missing any? Are any unnecessary?
- “Primary authority demonstrates its competency”, What do you think demonstrating this criteria should look like in practice?

LA resources & continuity

- Need to institutionalise knowledge of the FBO to ensure key information not lost if change in officer
 - What if the specialist moves to another LA or goes private?
- Will a PA officer need the expertise from the LA to effectively fulfil role?
- How do LA's integrate the PA strategy into their local resourcing obligations – clear role definitions
 - Will LAs be compensated for their support of strategies?
- General expectation that the FBO should pay for any additional cost of programmes related to the NIS
- Need to balance LA resource needs with PA income generation – some concern of the importance of PA income to LA decision making

Confidence & independence

- PAs must, in both practice and in appearance, be independent auditors and not been seen to be “defending” or “attacking” the business
- PAs must be seen to have the technical competence to understand not just the food system but the massive amount of data that underpins a modern business
- PAs must be able to, and be actively seen to, challenge the businesses they work with in a constructive fashion
- Are there conflicts with BEIS, FHRS, etc.?
 - In general, the relationship with FHRS will be very important and need to be thoroughly explored
- How can you demonstrate PA competence from Day 1?

Continuous improvement

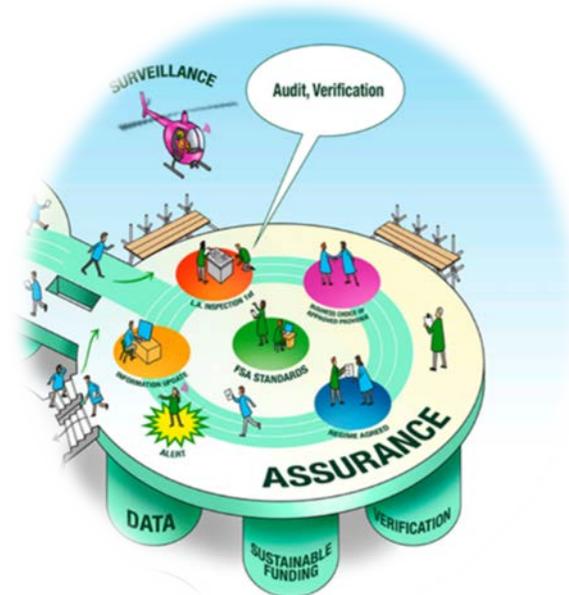
- PAs should work with other PAs to learn best practices – will there be a peer review process as well?
- Specialist areas & focuses may arise – how to manage, track, and build expertise?
- Need mechanism for LAs to provide feedback to PAs mechanism for PAs to incorporate
 - Should LAs be spot checking?
- How does the FSA challenge a PA that may not be providing the appropriate level of oversight and guidance?
- Can the interaction with the legal system be improved / streamlined through this strategy?

General

- Can the PA demonstrate understanding of each and every premises?
- Can the PA demonstrate resources & experience sufficient to manage the strategy?
- Clear staff competency and CPD to back it up
 - Possibly in specialist areas with a system that allows groups to “buy in” skills
- Can a standardised reporting dashboard be provided to support management of distributed branches of an FBO?
- Appropriate levels of integration with trade bodies may be valuable
- Trust in the system and the particular PA will be critical
 - A broad based communications programme to support the rollout may be appropriate

Certified Regulatory Auditor (CRA)

- Introduced the CRA concept with the goal to more fully leverage assurance data, increase efficiency, and align with broader governmental initiatives
- We would expect to see benefits in:
 - Resource & funding for assurance actives
 - Reduction of planned inspection burden – LA prioritisation of resource and officer expertise
 - Cost to businesses for overall assurance
 - Additional technical expertise in high risk establishments
 - Driving the consistency and quality of private assurance
- But we anticipate concerns around:
 - Lack of independence from the business that pays them
 - Biased / favourable opinions to their clients
 - Private auditors don't have the same competence as LA
 - LA officials and private sector in the same space just won't work
- ***This topic is still early stage, and we especially need your input here***



Questions Posed

- How can we build trust into the CRA concept for: Consumers, Regulators, Businesses
- How can we develop the CRA concept to work effectively in parallel with local authority delivery?

Certified Regulatory Auditor

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Perceived potential conflict of interest

- If the CRA is being paid by the FBO there exists a potential for perceived conflicts
 - Will the LAs and the public accept that the CRAs can effectively deliver services previously performed by LAs?
- How to build a good working relationship between the CRA and the LA enforcement officers if they may be in conflicting positions?
 - Will price controls be needed to avoid a race to the bottom?
- In general, how does charging fit into the discussion, and what would a market for these services look like?
- How is this developed in a manner complimentary to LA services
 - Need clarity on how this benefits LAs and consumers they serve

LA resourcing concerns

- What percentage of businesses will choose to go down this route, and how will this impact LA resource planning?
- Will LAs lose resources and information to the private sector
 - How will this impact their other work?
- Will LAs be left with poor and non-compliant businesses
 - Are LAs best placed to deal with these businesses, so is this outcome desirable?
- LAs should compete with private CRAs if desired
 - Conversely, could LAs employ CRAs?
- May need direct funding / cost recovery model (sustainable funding)

Oversight role definition

- Standard setting from the FSA will be central – how much control should be exercised (training, reporting, inspection criteria, etc.)
- Where does the risk / responsibility fall if things fail – the FSA/FBO/Auditor/LA/etc.?
 - The LA still is responsible for intervention / enforcement – will they still have the skills necessary to remedy issues?
- How, when, and to whom does the CRA report?
- How and when can a CRA be removed?
- How will LAs manage consumer complaints about CRA assured businesses – important to be clear that the CRA does not direct the LA
- A RIDDOR type system may be useful – do not want another LAEMS

Accreditation framework

- Where will the definition of the standards & qualifications needed come from – FSA driven?
- Demonstration of competence and standards important – how do Auditors demonstrate and continuously improve skills
- Specialist CRA resources will be needed – will this create a “market” for said skills that impacts the LAs?
- Will need a central & transparent register for CRAs and possibly “Food Safety Consultants”
- Training & methodology development for CRAs would be a core building block to the program
 - How would this be provided, and by whom?

Certified Regulatory Auditor

- How can we build trust into the CRA concept for: Consumers, Regulators, Businesses
- How can we develop the CRA concept to work effectively in parallel with local authority delivery?

Business uptake & perception

- Can we predict what proportion of businesses will take up the CRA option?
- Will they pay for this if the LA already has to do this for free?
- How does this change if a Sustainable Funding model is implemented?
- Will businesses have faith that the CRA will provide the same level of service as the LA?
- Will businesses feel that there will be a perceived risk from consumers – i.e. consumers may not have the same confidence in ‘outside’ LA auditors
- What is the case for change for introducing CRAs from the business point of view – can we quantify the benefits?

Enforcement impact

- How would a CRA act in the case an enforcement action is needed – if out of normal LA working hours what happens?
- How is an auditor penalised for not effectively performing their role
 - The LA is still the end owner of risk
- When is reporting of issues or non-compliance become mandatory?
 - When should the CRA help fix an issue and when should it be referred to the LA?
 - Pest issues often indicate broader problems – how would CRA manage?
- What are the consequences for non-compliance and how is transition from CRA to LA control managed?
- Will court enforcement become more challenging with a CRA?

Communications & appeals

- Can / should the FSA be a central data hub to support CRA operations?
 - Is this part of “The Thing”?
- Comprehensive, transparent, & effective data flow across all parties will be critical
- What if the FSA / LA disputes CRA findings – what if the business disputes them?
- Clear messaging and publicity explaining the arrangement and evidence to back it up
- Communication between LAs will be necessary
 - How to support improvement between different LAs who may be impacted by a single CRA?

General

- When people spoke out against this concept, the consistent theme was a lack of trust in industry to provide these services
 - Consumer confidence and perception at the core
- Where does the FSA / LAs need to be pro active and where should they be reactive?
- Data sharing will be fundamental – how to manage privacy, security, governmental obligations, etc.
- Risk – who is liable, who has indemnities (what industries can we learn from, i.e. gas)
- FHRS relationship would need to be clarified
- Does the CRA concept add enough value to outweigh the implementation complexity?

Region Specific

- As previously noted, messages were reasonably consistent across the eight regions in England, and this is reflected in the slides
- However, in Northern Ireland and Wales where there is mandatory display of FHRs score legislation, there were some significant differences on the private regulated assurance discussions
- Where the law requires inspections leading to an FHRs rating are carried out by LAs there was a recognised barrier to how the CRA concept could be implemented
- There were however, similarities to the LAs in England on the ideas that were put forward for Enhanced Registration and Segmentation

Northern Ireland

Registration

- Strong opinion that the FSA should introduce fixed penalty notices or permit to trade rather than introduce other enhanced registration measures as this was considered the most effective way to ensure early registration by new FBOs or where ownership changes
- Considered that the suggestion of a mechanism whereby FBOs regularly updated their details (yearly) would not work. FBO level of response would be low and the exercise would be resource intensive if LAs had to follow up FBOs who did not respond.
- FHRS could be used as a lever for verification and compulsory registration (will work in NI and Wales, where the scheme is mandatory).
- Possible changes to Ch.5 in the Code (e.g. factor in failure to proactively register into Confidence in Management score) – subsequently impacting their FHR, if within scope of scheme.
- Possible use of current enforcement tools, already available for failure to register

Segmentation

- Believed that it was appropriate that some types of low risk food businesses should be segmented out of the planned intervention programme.
- Believed that sustained compliance could be recognised (Code rating of 5), but concerns around the length of time a FHRS rating would be awarded for. The rating would be less meaningful.
- Challenged the complexity of the new approach, it would be resource intensive and would not provide significant benefit to justify the resource spent. Simple changes to the Code would produce more benefit and quicker.
- Questioned how FHRS would be impacted in segmentation.
- Some made reference to segmenting other establishments not commercially driven which generally demonstrate good compliance and have generic internal systems in place, e.g. schools, hospitals, prisons (therefore not all focus was on segmenting out low risk businesses....whilst others argued this would not be appropriate due to the vulnerable groups involved).

PA/NIS

- Discussed the importance that the PA should be experts in the field
- Need assurance - PA not just a 'defence' for the business as officers in NI have felt has been the case in past experiences
- Believe the current system of Pas is not robust - independent oversight of PA/audit of PA essential
- Concerns how FHRS would work with NIS

CRA

- Strong opposition to the CRA concept – believed this is an additional layer of bureaucracy - who will have oversight/audit of the CRAs?
- Have yet to see any consumer research to justify the change – need to know if it is truly desired by FBOs
- Noted that it puts the CRA into competition with LAs – do not feel this is fair
- Believe it would syphon resources from LAs – broader impact than just food
- CRAs would not have the wider information necessary to understand the business risk as a whole – conversely, LAs would lose a data source that could be necessary to their broader role
- General belief that private assurance cannot be trusted, and that it would be detrimental to a system that currently works well

General

Belief that the circumstances of the NI regulatory landscape was not the same as England and did not require the same 'solutions'. 'Its not broken therefore does not need to be fixed'.

Wales

Registration

- Many businesses do not register now and a changes in the FBO are detected at intervention/inspection
 - How will the new system manage this?
- Support for a national single 'database' for food businesses
 - How would it work in practice and would LAs feed into it?
- Possibly useful to look at how many non-registered premises are found to be non-compliant on first inspection
- Rent Smart Wales provides a digital system for private landlords and could provide useful information how the system was implemented and the challenges

Segmentation

- Support from Trading Standards for a more intelligence led approach to risk assessment
- Clarity was requested around how the system would handle FSA Ops premises
 - Audit arrangements for high risk premises
 - For premises producing and processing cooked and ready to eat foods may wish to transfer enforcement responsibility to LAs who have experience and competencies for inspecting these premises
- Combined risk assessment for hygiene, standards and feed is difficult
 - A premises which is high risk for hygiene may be low risk for standards and vice versa

PA/NIS

- Rating inspections are prescribed in law under the FHR Act in Wales
 - How will this work when every business has to be fully assessed unless exempt?
- Local implementation issues can occur and these may be missed if NIS does not require an intervention to the business

CRA

- Perceived privatisation of food regulation by the back door
- Service planning and resourcing more difficult as it will not be possible to determine business take up the CRA option
 - May vary according to business profile within an LA
 - There could be more multinational companies in one area that may be interested

General

- LAs service planning and resource allocation is linked to the inspection plan
 - How will LAs protect resources if approach changes?
- Deskillling of food officers – competency and experience are developed by inspecting different types of food businesses
 - The approach may reduce officers exposure to different types of businesses and food production processes
- Perceived loss of capacity to handle incidents, scandals and outbreaks
 - Potentially less food officers who would be able to response to major events