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Dame Deirdre Hutton CBE
And Members of the FSA
Board
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Date: 09 December 2008

Dear Dame Deirdre and Board Members,

Re: UK-wide 'Scores on the Doors' scheme on hygiene standards in food businesses.

The Association of London Environmental Health Managers (ALEHM) are dismayed at the recommendation in the Board paper not to introduce a 5 star (6 tier) Scores on the Doors scheme and that provision is to be made in a national scheme for revisits to businesses to rescore upon request.

These are 2 fundamental issues which ALEHM believes are critical to the credibility of a national scheme and are essential to attract the support of ALEHM member authorities. We set out our strong reasoning for this position in our response to the public consultation.

Our belief that a 5 star approach is the best way forward is not based upon being precious about our own scheme just so that we do not have to change. It is because, along with many others, indeed most other LA's running schemes currently, we have found that it works incredibly well in achieving the intended aims of the scheme and is popular with the vast majority of our businesses, who have really engaged with it.

It is because of this strong belief that we and many other '5 star authorities' have already undertaken to make amendments so that we can align all the 5 star schemes with a common scoring format. We are therefore not being protective about the detail, but passionate about the strength and benefits of the 5 star approach. We have got together with colleagues from all around the country to agree this alignment and to effectively provide the FSA with a ready made scheme that is already in place

in 41% (177 out of 434) of the authorities in the country and covering approximately 50% of the population already.

The expense of introducing a whole new approach cannot be seen as an effective use of public resources. The FSA have a commitment to cut £138 million from their budget by 2010 and since 41% of ALL local authorities already operate the 5 star scheme, there will be considerable savings in maintaining the existing schemes rather than moving to 4 tiers.

At an Environmental Health Executive Briefing this week, Sarah Appleby of the FSA stated "What we do has to be based around what is going on in local authorities." What is going on in a significant percentage of those authorities is the operation of a very successful 5 star scheme. So why does this recommendation not fit with that statement?

Local authorities want to build upon that success, not to undo all the good that has been done and which has taken in some cases over 2 years to become established, by having to dismantle their schemes and implement and explain to businesses all over again a whole new scheme. The Board paper fails to provide sufficient convincing arguments that the 5 star scheme is so flawed that this is necessary.

Support of local authorities is critical to the success of the FSA's proposal for a national scheme, as it is those authorities that will have to operate it. It is therefore seen as very unfortunate that the FSA has chosen to recommend an approach that is not favoured and unlikely to receive the support of the authorities that will be asked to operate it.

Many in the local authority sector are of the view that 'bigger' business interests have had a disproportionate voice in calls for the national scheme not to be a 5 star one and for rescoring visits upon request to be allowed. 'Bigger' businesses represent only about 16% of a local authority business profile (based upon a random survey of business views submitted with our response to the consultation). Yet 91%, of those surveyed, (including the 16% bigger businesses) supported a 5 star scheme, with just over 3% preferring a 3 star (or 4 tier) approach. Whilst a relatively small sample on a national scale, the sample is big enough, allowing for a margin of error, to give a compelling endorsement by businesses on the ground of the 5 star scheme.

It is because of this overwhelming support and success at a local level that 5 star authorities have become entrenched in their arguments for a 5 star national scheme and why a significant number of authorities will opt not to adopt a 4 tier national scheme.

We would therefore urge the Board not to endorse the recommendation in the Board paper for a 4 tier scheme, as this will immediately defeat the aim of a unified national scheme, but to approve a 5 star (6 tier) scheme.

Yours sincerely,

Rick Mason
Chair – London Scores on the Doors Implementation Group