

Adapting the Food Hygiene Rating Scheme for a modernised regulatory system

Research report April 2019



Food
Standards
Agency

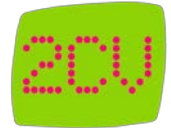


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1. Executive Summary

Background and methodology

The Food Standards Agency (FSA)'s Regulating Our Future (ROF) programme is modernising the way food businesses are regulated, to create a system that is modern, risk-based, proportionate, robust and resilient. Some of the reforms being made as part of the ROF programme are likely to impact on how the Food Hygiene Rating Scheme (FHRS) operates. Currently a rating is provided to a food business following a physical inspection of a premises by a local authority officer. The ROF reforms include the introduction of Primary Authority (PA) National Inspection Strategies (NIS) for food hygiene and a new risk segmentation model which may change the way in which businesses receive local authority interventions, and therefore how they are given a rating. The FSA need to ensure that they maintain a robust and credible FHRS while enabling ROF to deliver its food regulation reforms.

The FSA wished to explore the views of consumers and food businesses to achieve the following research objectives:

- to better understand current attitudes and behaviours in relation to FHRS; and
- to explore responses to potential impacts on FHRS as a result of the ROF programme, specifically:
 - risk segmentation – the potential for lower risk businesses to receive fewer inspections or for very low risk businesses to be taken out of the inspection programme; and
 - PA NIS – businesses in a PA NIS¹ potentially having their FHRS ratings refreshed based not on the findings of a physical inspection by the local authority but rather using evidence provided by the business that has been derived from other sources².

A qualitative research methodology was designed to explore these areas, consisting of:

- Seven day-long workshops, each with a demographically mixed group of 16 consumers (all of whom used FHRS); and
- 26 depth interviews with small and micro food businesses.

All research was conducted by Community Research and 2CV Research, the FSA's Citizens' Forum research partners.

¹ While any business in a Primary Authority partnership could be part of a NIS, FSA current thinking is that the approach will likely be more attractive to larger (multi-site) businesses and groups of businesses, due largely to how the current regulatory system is funded.

² It is possible that the data / evidence used may include reports of physical inspections by the food business operator (FBO) or an audit company employed by the FBO; when discussing this concept with consumers, the focus was on the reduced frequency of physical inspections carried out by the local authority.

Main findings

Current attitudes towards and usage of FHRs

Overall, **consumers** were positive about FHRs. They found it a useful and straightforward tool to provide at-a-glance guarantees (or deterrents) about an eating establishment. Most consumers broadly understood what a rating meant, although during discussions, they realised that they had some unanswered questions about the scheme. Very few paid attention to the dates of inspections, and most were unaware that the scheme incorporated food businesses beyond cafes, takeaways and restaurants.

The extent to which consumers were using FHRs varied across our sample. Some used it simply for 'on the spot' confirmation that a food business was safe to use at the point of entering, while others would look up a rating (and sometimes the detail behind this, for example the date of the last inspection) in advance. Broadly speaking, consumers were more likely to use the scheme when they were going somewhere new or for a special occasion, and less likely when they were going to a tried and tested establishment.

Food businesses were also largely positive – or at least neutral – about FHRs. Those who were most positive felt that their high ratings were a useful selling point for their business, and often valued the support they received from their local authority. Other businesses, while less convinced that customers paid attention to FHRs ratings, still felt that it was important that the scheme existed to encourage high standards across the industry. A minority of businesses (with lower ratings) were less positive and felt that their rating was unfair.

Knowledge of FHRs amongst food businesses varied. Some had a thorough understanding of what was required to achieve a top rating; others were not even aware that they were in the scheme at all, despite having received ratings. Similarly, awareness and knowledge about how frequently businesses were inspected differed across the sample, with some fairly confident about the broad timeframe for their next inspection, and others very unsure. There was a sense amongst many that it was important that inspections were truly unannounced for them to be most effective.

Response to impact of risk segmentation on FHRs

The idea of risk profiling different food businesses made intuitive sense to **consumers**. They welcomed the idea of resources being focussed on higher risk or non-compliant businesses. They recognised that they themselves had been unaware that certain food businesses were in the scheme and therefore it made sense for low risk businesses to be exempt. However, they were less comfortable with the idea of such businesses never being inspected at all, and would prefer an initial inspection to confirm that they were doing what they said they were doing. Similarly, they also acknowledged that most consumers were not aware of the date of a food business' last inspection, and so reducing the frequency of inspections for lower risk businesses would be a sensible use of resources.

Overall, **food businesses'** views largely aligned with consumers' when it came to risk segmentation and FHRS. They saw this as a more efficient use of resources, even in cases where they themselves were higher risk and so likely to receive more inspections. They also felt that it was important that all businesses receive an initial inspection, even if they were then profiled as low risk and exempt. This was partly for the purposes of verifying these businesses were correctly registered, but also for the support and guidance that could be provided to new businesses when starting out.

Response to impact of PA NIS on FHRS

Consumer views on the acceptability of using a wider range of evidence provided by the business rather than a physical inspection carried out by a local authority to refresh a FHRS rating were much more varied than those towards risk segmentation reforms. By and large, consumers were more accepting to the idea when the food business in question was a retailer (as opposed to a restaurant) and when the period between inspections was not too wide (annual or every two to three years). However, views were in part driven by attitudes more generally towards 'big business', with some more trusting than others. Those who were more accepting felt that large chains could be trusted to maintain high hygiene standards because of the reputational implications of not doing so. By contrast, those who were less accepting felt that large businesses might try to take advantage and manipulate the data in order to save time and money.

Again, the views of **food businesses** were similar to those of consumers, in that they ranged from those who were quite relaxed about the concept and trusted larger chains / multi-site businesses, to those who were more cynical about the likelihood of these businesses to do things by the book. Many of the food businesses we spoke to had previously worked in larger chains – for some, this meant that they were more confident that they would uphold standards due to strict internal processes, whilst others had their own experiences of larger businesses not being consistent, and so needing those external physical inspections at local outlets to keep them on their toes.

2. Introduction

2.1 Background and context

For the UK to continue to be a strong, credible player in the global food economy, the regulatory regime needs to be flexible and responsive and able to keep pace with rapid change. The Food Standards Agency (FSA)'s Regulating Our Future (ROF) programme aims to achieve this. The strategic direction for the programme, is set out in ['Regulating our future: Why food regulation needs to change and how we are going to do it'](#).

The FSA has recognised the implementation of Primary Authority National Inspection Strategies are likely to impact on the Food Hygiene Rating Scheme (FHRS). Currently, a rating is provided to a food business following a physical inspection of a premises by a local authority officer. Primary Authority National Inspection Strategies (PA NIS) for food hygiene may change the way in which businesses receive local authority interventions, and therefore how they are given a rating. The FSA needs to ensure that they maintain a robust and credible FHRS in delivering the food regulation reforms being introduced as part of the ROF programme.

2.2 Objectives

The FSA wished to explore the views of consumers and food businesses to understand current attitudes and behaviour in relation to FHRS, and how these might be impacted by changes to the scheme arising as a result of the ROF programme.

The overarching aims of this project were to inform:

- future marketing and awareness raising campaigns for the FHRS and
- the development of any adaptations to FHRS operation that may be required as a result of NIS / risk segmentation.

The research objectives were to explore:

- consumers' and Food Business Operators' (FBOs') attitudes, knowledge and behaviour in relation to FHRS; and
- how ROF impacts on FHRS should best be managed and communicated in line with consumer and business priorities.

2.3 Research methodology

2.3.1 Overview

A qualitative methodology was designed to meet the project objectives, consisting of:

- Workshops with consumers; and
- In-depth interviews with food businesses.

Each are described in more detail below.

2.3.2 Consumer workshops

We employed a deliberative research approach for the consumer workshops, a method which involves taking participants on a journey from ‘uninformed consumer’ to ‘informed citizen’. A deliberative methodology worked well in enabling us to explore firstly spontaneous attitudes and behaviours in relation to FHRs, followed by both top of mind and informed, considered responses to the potential changes to the scheme.

The deliberative approach allowed for direct communication and interaction between members of the public and expert stakeholders, in this case FSA staff across England, Wales and Northern Ireland with specialist knowledge about the ROF programme and/or FHRs system. Public participants were able to ask clarification questions directly of the expert stakeholder participants to help them make up their minds about an issue – and to discuss the implications with the experts and amongst themselves.

This meant that discussions evolved organically within the research session themselves; a standardised set of ‘starting material’ (handouts and presentations) helped to generate initial discussion, but conversations amongst participants also reflected the ad-hoc questions, challenges, and clarification material emerging from this back and forth debate and reflection. Of necessity, this meant that the way that the topics are explored and debated may vary slightly from session to session, as expert input and participant discussions respond to evolving conversations and contributions.

A total of **seven day-long deliberative workshops** were conducted in November, December 2018, and January 2019, each with 16 participants. Workshops were held in the following locations, providing coverage across England, Wales and Northern Ireland:

- London
- Manchester
- Nottingham
- Belfast
- Derry
- Swansea
- Wrexham

Each workshop included participants representing the following demographic spread:

Total	16 in each location
Gender	
Male	8
Female	8
Age group	
18-24	3
25-34	3
35-54	4
55-64	3
65+	3
Ethnic background	
White British	Depends on locations chosen – matched local population.
BME Background	
Working status	
Employed (including quotas for part-time, full time, casual workers)	9
Unemployed	3
Retired	3
Other	1
Social grade	
AB	4
C1C2	7
DE	5
Lifestyle	
Dependent children	At least 6 at each
Geography	
Rural	At least 4 at each

In addition to these demographic quotas, all participants were recruited as regular or occasional users of the FHRS scheme.

2.3.3 Food Business interviews

Insight from food businesses was gained via a series of 26 in-depth interviews, conducted both by telephone and face-to-face, covering the same time period as the public workshops. Participants were recruited across the three nations as follows:

- 12 x England (London, Nottingham, Guildford, Farnham, Folkestone, Manchester)
- 8 x Northern Ireland (Belfast, Derry)
- 6 x Wales (Swansea, Cardiff, Wrexham)

All businesses that took part in the research were small or micro sized (i.e. under 50 employees) and represented a range of different types of food businesses.

Total	26
Café / coffee shop	8
Restaurant / pub	7
Retailer	2
Other (including nursery, home baker, mobile food unit)	9

They also had a range of different FHRs ratings (or were exempt from the scheme). None of the food businesses interviewed had a rating of lower than 3 (although some in the sample had previously had lower ratings – in their current or previous establishment).

Total	26
Exempt	2
Awaiting	1
1	0
2	0
3	2
4	5
5	13

2.3.4 Discussion materials

Both the consumer workshops and the FBO interviews followed a similar format in that they each covered the following discussion areas:

- Knowledge of, attitudes towards and behaviour relating to FHRs
- Response to:
 - Risk segmentation, specifically some low risk businesses being inspected less frequently and / or being taken out of the inspection regime, and so FHRs, altogether.
 - PA NIS, specifically some (multi-site) businesses having their FHRs rating refreshed based on evidence provided by the business rather than a physical inspection carried out by the local authority.

Given the additional time available in the consumer workshops, the following topics / exercises were also included:

- Group exercise with scenarios asking consumers to compare different types of food businesses with ratings based on evidence or based on older physical inspections.
- Discussion about how / whether to communicate these changes to consumers.

The full research materials can be found in the Appendices of this report.

2.3.5 Research limitations

As with any qualitative research exercise, it is important to note these findings are not intended to be statistically reliable and, as such, do not permit conclusions to be drawn about the extent to which something is true for the wider population. Furthermore, there are particular characteristics of this piece of research that should be highlighted:

- **Consumer sample** – as all participants were recruited to be users of the FHRS scheme, the research findings cannot be generalised to non-users. However, we can anticipate that strength of feeling about the changes to the system are likely to be considerably more muted amongst those not currently using the scheme.
- **FBO sample** – although we tried to recruit food businesses with lower ratings, this did not prove possible within the timelines and boundaries of this project; businesses with lower ratings (0-2) are exceedingly difficult to engage in FSA research. The views represented here are taken from businesses with ratings of three or above; it should be noted that this is mostly representative of the naturalistic FBO community, as 89% have a rating of 3 or above.³ It seems reasonable to assume that food businesses with lower ratings would be likely to have less positive views of the existing FHRS scheme (indeed those in our sample with ratings of 3 tended to be less positive than those with 4 or 5s), and may also respond differently to changes brought to the scheme as a result of the ROF programme.
- **Organic / iterative discussions** – As noted above, it is the nature of deliberative research, especially with expert Q&A sessions, means that there is some variation in information provision across the workshops. We have highlighted where specific details were influential in shaping views, even where these details were not present as part of the information provision in all sessions.

³ The latest [Local Authority Enforcement Monitoring System \(LAEMS\) data report](#) identifies that 89% of food business establishments are complying with the necessary regulations at a satisfactory level or above. This equates to an FHRS rating of 3 or more for those businesses where this is applicable.

3. Main findings

3.1 Current attitudes and behaviours – consumers

3.1.1 Overall attitudes

By and large consumers were positive about the FHRS. They found it straightforward and easy to use. Consumers praised the fact that it provided instant reassurance in that they could see at a glance whether somewhere was safe to eat. Some used the sticker almost like a quality assurance sign or kitemark.

“I just tend to think of it as a guarantee that me and the family are not going to get food poisoning or ill, or anything like that. It’s just a guarantee and that’s that. It’s as simple as that.” Wrexham

“I am quite an avid follower of it and would rarely go anywhere if it was below a five... I take a real keen view of it because I think it’s a really important factor.” London

A number of consumers also mentioned having heard stories about the scheme’s enforcement aspect of taking action against low-performing businesses; for example, having read or heard stories about premises being closed down upon inspection, or having seen media singling out businesses for having low ratings or having tried to cover up their ratings. This gave them further confidence in the system and its ability to protect consumer safety.

“I never check the business individually, but you do see a lot of articles like Wales Online, that these are all the restaurants that have a 1 star rating in the local area. And you read that, and you go okay, and it sort of goes into my head, I won’t go there.” Swansea

“You always see articles like ‘these are the top rated takeaways in your area’... So they’re always interesting to read.” Manchester

As consumers moved from spontaneous feedback to more considered views, a range of points were raised. On reflection, many participants realised that they were not sure about some of the details about the scheme and started to ask questions about how it works. As is common in deliberative research, the mere action of reflection on a topic (FHRS) raised some concerns and more challenging questions than would have surfaced spontaneously.

For example, in most locations our early discussion around FHRS raised questions around:

- **High rated businesses that feel intuitively ‘risky’ to consumers:** A number of consumers commented on the fact that places that they would have expected to score badly, namely chain fast food places, had 5 ratings. This often didn’t tie in with their own impressions of such places. Similarly, some consumers felt that certain types of food businesses, particularly mobile food units, were not equipped with the facilities to maintain hygiene standards, for example if they did not have running water.

- **Low rated businesses that intuitively feel ‘safe’:** On the flip side, some consumers also gave examples of food businesses they were aware of that had received low ratings despite being (in their opinions) very clean – or certainly giving the impression of cleanliness. In some instances they questioned whether the scheme was unreasonably strict and / or whether there was too much emphasis on paperwork and records, rather than using ‘common sense’.

“Sometimes you can’t tell can you. Because you can go to a posh restaurant and think it’s really good, and then they see the sticker...you don’t know, do you? Sometimes you can go to a really rough dive, and best food and they’ve got a really good [rating].” Swansea

“I think the number rating actually is very subjective because you’re not too sure what it’s rated on really.” London

“I know a restaurant that was a 5, it went down to a 1 and went back up to a 5. But it only went down to a 1 because there was a changeover with the chef and a lot of people went missing, that was what I was told about them. So, they automatically went down to a lower grade, but it was nothing to do with cleanliness of the place, it was more just the bookkeeping.” Swansea

“I don’t understand. How can a van by the side of the road have a 5? Where do they wash their hands? Where do they go for a wee?” Derry

3.1.2 Knowledge levels

Most consumers had a base level knowledge of the scheme and how it worked, in that they broadly understood what a rating meant (although some assumed that even more was incorporated in a rating). They also recognised (in England, where display is not mandatory) that a lack of rating sticker displayed at the business likely indicated a lower rating – although they acknowledged that they often did not notice when businesses did not display their rating.

“In the last six to 12 months, I’ve become more aware of it [FHRS] but I’m not clear if it’s a legal obligation to show it or not because, if it didn’t show, I sometimes don’t even notice it.” London

“If you got a poorer type score, are you quite within your rights not to display anything? Because that’s probably what you would do.” London

“You are aware of it when you go in, you do notice if there’s not a sticker on the door [in FBOs in England]. You think why haven’t they displayed it? What have they got to hide?” Wrexham

A few seemed to have somewhat less understanding of the scheme and confused it with Tripadvisor scores.

“Tripadvisor is fantastic. It tells you the cleanliness of the place as well. Food hygiene and stuff. If it was low, I wouldn’t rate the place. I always like going on Trip Adviser to find out what the place is like before you give it a shot.” Belfast

There were a handful of consumers in our sample (in this case, in Wales) who tended to be more well informed about the system and so were also aware of aspects such as the fact that retailers and other types of less ‘obvious’ food businesses were also included, and that supply chain food businesses were part of the scheme.

“Even if you make stuff at home, say if you did a cake sale, if you were making them at home and baking cakes at home or something, they have to come to your house and check.” Wrexham

There were some misconceptions about the scheme amongst a minority of consumers, most commonly:

- That ratings denote food quality in terms of taste or produce quality (e.g. meat ‘quality’ or place of origin; water content in meat, etc).
- That hygiene inspections included checks of food labels for allergens.

Across the differing knowledge levels, most consumers were interested to understand more about how ratings were decided and how often the businesses were inspected.

Very few consumers were aware of any specifics around frequency of inspections, or that dates of inspections are included on FHRs stickers. When prompted, there was a range of expectations in relation to the frequency of inspections. Some expected that food businesses were inspected every six months, whilst others assumed inspections were less frequent. Overall, there was an assumption across the board that places were never inspected less frequently than every couple of years.

Most had not considered whether different types of food businesses would be inspected at different frequencies – although there was an expectation that places that received lower ratings would be inspected more often than those with higher ratings.

“I do think, if someone was a 5 for a number of years and they’d never changed, they’d be at the bottom of the list for checking. So it could stretch beyond annually perhaps because I guess there’s only a limited number of inspectors and thousands of places to check.” London

Only a handful of people across locations considered that inspections were not frequent enough based on more detailed understanding of inspections frequency.

“One thing that does annoy me is that with a lot of them it’ll be like ‘last checked in 2016’, and it could be rubbish now. So I’d like it to be up-to-date a bit more.” Manchester

3.1.3 Usage of the scheme

While all our public participants were using FHRs, there was a significant variation across our sample in terms of the extent and the ways in which they were using the scheme.

The majority of participants used FHRs stickers for ‘on the spot’ confirmation that a business of interest to them was ‘safe’. They would glance at a rating as they walked into an eating

establishment – and consumers felt a good rating at this moment in their decision-making journey provided them with what they saw as an added guarantee that they had chosen a good place to eat. In each nation, some participants also had stories of seeing FHRS stickers that made them rethink their choice.

“I glance at the stickers in the doorways or on the display stickers, always, I always make a point.” Swansea

“I’ve been at the door and seen a low score and walked right back out.” Derry

Some consumers went further and would look up a food business’ rating prior to their visit to reassure themselves that they were going somewhere safe. Explored below are the instances where consumers were more likely to do this.

“I always check unless it was somewhere I knew really well.” Derry

A minority of consumers went further still and would seek out the detail behind a food business’ rating, for example look at the different components of the rating or the date of its last inspection, in order to give themselves a full picture.

“They explain it more in detail to you [on the FSA website] and they give you all the different ratings there as well. You know you’re safe if it’s a 5, even a 4’s not bad.” London

Consumers did not use FHRS alone to judge a food business’ hygiene. Implicitly or explicitly, they tended to couple this information with what they had heard about a business (e.g., from reviews, recommendations and word of mouth), as well as from their own impressions or experiences. For example, existing habits were reported as a powerful driver; if they had regularly eaten somewhere over a long period of time, they would deem this a safe place to eat. Sensory information was also a compelling heuristic for decision-making; if consumers walked into an establishment and saw something that felt unclean or unkempt, such as dirty toilets, that made them feel less confident in a business’ food hygiene as well.

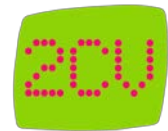
“If it wasn’t displayed and I liked the look of the restaurant or café or whatever and it felt good, then I would possibly use it.” London

“Sometimes you just go into a place and you know, you go in there for one minute and you walk back out because it’s just like... I don’t know, you get that feeling, you immediately know that the standard’s not good enough, and then other places everything seems clean.” London

“4, I’d check, and then 5, I’d feel a bit safer. But there again, still be aware - if it’s a grotty looking waitress serving.” Wrexham

All of our participants’ examples of using FRHS were instances of using the scheme when eating out (or getting takeaway food); i.e. for judging the safety and hygiene food handled by others. Most were unaware that the scheme even existed for retailers, although a handful did say they used it in some instances; for example, they would only buy what they perceived to be less risky items from food retailers with low ratings.

“I never even gave supermarkets a thought. My main concern is when I’m buying from Chinese or Indian takeaways.” Manchester



“When I go to Tesco’s or a Tesco’s Extra... because I want to go in there and get a can of coke and a bag of crisps... It doesn’t even enter my head [to look at the hygiene rating] because I don’t have to think about it.” Wrexham

“I’d buy a drink, but I would be careful, I wouldn’t drink out of the can.” Wrexham

Overall, use of FHRS varied by occasion, perceived risk, choice and familiarity. The table below sets out times when consumers said they were more / less likely to use the scheme:

More likely	Less likely
New establishments	Tried and tested establishments
New locations	When there was limited choice
Special occasions	Chain eateries
When they were in charge of a meal e.g. organising a client dinner or birthday party	‘Last resort’ eating occasions; for example being very hungry but with only limited options (e.g. a petrol station during a journey)
Takeaways / fast food places – especially when ordering delivery i.e. not able to see premises	

“If it’s a special occasion or celebration, a major birthday or something, then I would look.” Nottingham

“If I’m in an unfamiliar area or a small start up that I don’t know anything about, I would definitely [check]” London

“If I was out of my own area, I would definitely look for the hygiene rating certificate. Because I wouldn’t be familiar with the local places. Or if I was taking people out for a meal. I would check to make sure that it didn’t have any issues that might cause embarrassment.” Belfast

“I don’t know what the X is and it’s my favourite takeaway... I wouldn’t check them but with new places I would definitely research.” Nottingham

“Because [chain restaurants] have a big reputation to protect, you expect them to be right on top of it.” Manchester

“When you go there, it’s just so clean and the staff always look so clean, it just takes your eye off checking what the rating is, because they are just like, they always look so clean and the tables are always clean.” Wrexham

“Where I wouldn't check it is literally the big brands because they’ve got so much to lose and that’s the thing, you know they’ve got a certain standard and, if they were messing about, it would be in the news literally immediately.” London

The acceptability of lower ratings and the influence that this had on consumer behaviour varied depending on consumers’ own personal risk orientation and circumstances. For most, ratings of 3 or above were acceptable – but some expected 4 or 5 as their personal minimum standard.

“I am quite an avid follower of it and would rarely go anywhere if it was below a 5. I think the only place below a 5 I would use is our local bakers and I’m not quite sure why they’re below a 5.” London

“I look at the door when I go there but say if it’s under a 3, I most probably wouldn’t go there, but if it’s over a 3 then yes.” Wrexham

Some consumers reported varying personal standards depending on the type of food establishment. For example, they said that they would be more prepared to eat at certain lower rated businesses than others, if they felt that there was a reason for their lower rating (e.g. the premises were old and so harder to maintain) or if they felt a low rating mattered less (e.g. if they were buying ‘low risk’ or pre-packaged food).

“A new place I would expect it to be a 5 but like some 400 or 500-year-old pub I’d be happy with a 4.” London

“Say if I went to Snowdon, I know there’s a tiny little cottage/café and I went there for afternoon tea with my wife, and it was just tea and cakes, and it had a 3, that’s cool, that’s alright. But if I went somewhere and I was getting a curry or an Indian or something like that, I’d want it to be a 5. I’d feel safe having a cup of coffee or tea and a cake on a 3... But if you want a full-on meal, like a dodgy Indian, I’m not going to go for a 3 because you think, s*, what am I eating.” Wrexham**

“I definitely focus way more for a restaurant than any other, or perhaps a café, than any other type of catering.” London

For those who are aware of retailers being in the scheme, some are more relaxed about lower ratings if they are purchasing something pre-packaged.

Across the workshops consumers related instances of ratings having influenced their restaurant choices, particularly for special occasions. There were also examples given of people abandoning restaurants on discovery of low ratings.

“I recently was out with my mum and we spotted a place at the bottom of the street... It looked lovely from the outside so we went down... it had a rating of a two on the door so we turned around and went elsewhere.” Belfast

“I was in my noodle bar and I’d already ordered and paid and everything and here it comes smelling good and THAT’S when I notice it’s a two. What did I do? I walked straight out. I haven’t been back.” Derry

However, some consumers (more often men) admitted that ratings wouldn’t get in the way of an established habit or a good meal, particularly when past experience reassured them that the place they were eating at was safe.

“I was having a look last night to get prepared for today and I was surprised that some of the places I would go to eat haven’t got a five star rating and I would have expected them to... I am maybe a creature of habit – if I get a good meal, I go back.” Derry

“I’ve been going there before I started thinking about this [FHRS] and so it’s always been great and I just trust it. And maybe it’s because I look at the people in there, I

look at the furniture, I look at the outside of the building, the food has never failed me... I just feel like if you're that busy you can't get dirty. It sounds ridiculous but it's like your stuff... you're never going to get anything go off there because it's just out all the time, the takeaway and the restaurant bit, the restaurant bit is immaculately clean, everything is immaculate. So, no, I haven't looked because I've eaten there so many times and it's always amazing." London

3.2 Current attitudes and behaviours – food businesses

Attitudes overall

Attitudes overall amongst food businesses in relation to FHRs varied, but most were positive or at the very least neutral about the scheme. Even amongst those who had criticisms, there was a general sense that it was a good thing that it existed. One business likened a FHR score to a driving licence, allowing them to be safe to practise.

Those who were most positive were often those with high ratings, who felt that having a high rating became a useful selling point for the business, for example, being able to publicise the rating on their social media accounts. These businesses were proud of their ratings – and felt that their customers noticed too and thus that it impacted their bottom line.

**"My customers absolutely do notice, so it's something you have to do. It's just one of those things we have to do, one of the regulations – part of doing business."
Corner Shop, Belfast**

"It would be fair to say that I would be seriously cross if we didn't have a 5 star rating because if you think about the business profile that I am trying to project, not having a five star rating or losing our 5 star rating would be very very bad indeed from a marketing point of view." Cheesemaker, Belfast

"We tell people when we've had the inspection, we'll put it on our Facebook page with a 5 star rating." Tea shop, Nottingham

Some also saw it as a useful point of comparison against competitors.

"You've got a 5, you put it out there big time. When we go to venues and fairs etc., if I'm parked next to someone who's got a 2 but I've got a 5, whoa, I'll have banners made, 'we are a 5 arrow only 2 next door'. You use it to your advantage." Mobile unit, Swansea

**"A lot of parents will look to see what our ratings are before they choose a nursery."
Nursery, Cardiff**

The most positive businesses also often had good experiences of working with the local authority – they felt that they had received invaluable support from the EHOs and had found the process quite beneficial.

"In our first year of trading ... they were really thorough in going through and helping us, as there were obviously things we weren't aware of .. year two and three and four no problems .. then in year 5 we were under different management so I

wasn't there as much and there was a couple of issues, but they were very supportive again in addressing them, they were able to give us leads in helping us address them, and then they came back a month later and we kept the 5." Café, Belfast

"I've always found that, if you ask them questions and you are like 'what is it and what's the law and what do I need to be doing' then they will work with you." Canteen, Guildford

"[The EHO] came here. So we talked through the importance of paperwork, we talked through the things that you need on a practical level and then she physically inspected my kitchen. It was good because one of the great things was as well an inspection... I asked her genuine questions I had about what I was making because obviously I didn't want to poison anyone. So that was good." Home baker, Farnham

A few businesses also specifically mentioned the Safer Food Better Business pack as having been helpful, although some felt that it was less useful for businesses with more complex arrangements.

"The Safer Food Better Business is a fantastic pack anyway in itself." Pub, Swansea

"The food business pack is fantastic for someone that doesn't know what they are doing. Or a small café kitchen, or something like that." Restaurant, Nottingham

Those who were more neutral or ambivalent about the scheme still considered it important that FHRs existed. They thought it was important to encourage standards across the industry and to level the playing field.

Where FBOs views were more ambivalent this was often due to the fact that they did not believe that customers paid that much attention to it; this view was more common in England, where FHRs display is not mandatory, and where salience of FHRs also seemed lower in our qualitative sessions in comparison to Wales and Northern Ireland. These businesses reported that regardless, they did not want to receive a low rating themselves; this was more about pride in their own standards than because they thought a low rating would have a negative impact on their business. Some of these businesses told us that while they might advertise a high rating, it would be fairly easy to 'get away' with a lower rating (e.g. a 3 versus a 4/5) without risking lost business or reputational damage. However, even these businesses tended to think that lower scores (0-2) might be harmful reputationally.

"I don't think it's as publicly thought about as everyone thinks it is. We don't advertise our 4 stars." Restaurant, Nottingham

"No one comes in here and says 'why are you only a 4, why haven't you got a 5, what's going on'." Canteen, Guildford

"It gives them (the customer) if your rating is good .. it gives them more confidence .. I display on the stall just on the table ... Honestly I don't think people really look at it ... they are more likely to look at what you have [to sell]." Home baker, Belfast

“The rating itself no [people do not comment on it], but people would comment on the cleanliness of the shop ... quite a lot of business people, parents come in .. I think it does matter even though no one has commented on it.” Café, Belfast

For some businesses, the lack of competition for their business in their local environment made them feel that that a rating had less importance than it might do if they were competing for business.

“There is no other business around so even if you displayed a 1 or a 2, whatever it would be, it doesn’t really matter what score it would be. You’re in such a catchment area that it wouldn’t really matter because people haven’t really got that much choice in that area.” Pub, Swansea

Where views were more negative, this tended to be driven by negative experiences engaging with the FHRs system. For example, some of the businesses we spoke to felt that the inspections could be overzealous and unrealistic.

“Overall yes, it’s very important, although sometimes you get them enforcing rules that you just think – come on. Like you can’t have a big cut of beef in the fridge for more than two days. And he knows actually it’s okay, and I know actually it’s okay, but the rules say he has to mark me down. So I do wish there could be more common sense – you wouldn’t throw that away.” Café, Belfast

A handful of businesses, all of whom tended to have lower ratings, also reported feeling that the scheme was unfair. They complained that the inspections were inconsistent or lacking in common sense, and felt that they’d been ‘caught out’ by missing paperwork, which they saw as less fundamental to hygiene standards and consumer protection – and that they had been unfairly penalised for paperwork gaps even though their premises and practices were of a high standard. These businesses also tended to have less positive experiences with information provision and preparation for inspections, and did not always feel fully supported by their local authorities. One FBO had complained about their rating, but when the LA returned to inspect again, received the same rating.

“I think that they hang up on paper work which is a big thing to fail on, because if you’ve just not done it on one day, they just take that as you don’t do it. Which I agree with as well, but it’s a tough thing.” Restaurant, Nottingham

“We paid for a revisit [after getting a 1 rating] and they gave us a 3. Again I was very surprised because our kitchen was spotless.” Restaurant, Nottingham

“I’m not happy that they came at times when I wasn’t here, didn’t ring me and give me the opportunity to come back and attend. That, to me, isn’t fair when you’ve got somebody who’s as bloody keen as I am to make it immaculate and to make a reputation, which we have, we’ve got a fabulous reputation.” Pub, Guildford

Most of the businesses we spoke to were unaware of any difference FHRs made to their wider business or insurance; only one business in the sample did note that their FHRs score impacted on their insurance, and another had experienced it being a potential factor in calculating premiums.

“It affects our business quite a lot the Food Hygiene rating because we can’t actually get insured as a food business if we don’t get 3 stars or more.” Restaurant, Nottingham

“Funnily enough, it never occurred to me that it would [make a difference to insurance] but I was asked the other day ‘can we quote’ and I said fine and they asked what the rating was and I thought that’s a very interesting one, isn’t it? But, in fact, it didn’t make any difference that it was a 3, it could have been a 5. If it had been a 2 or a 1, I think they probably wouldn’t have wanted to insure it or they’d have raised the premium, but I think at a 3 they felt comfortable.” Pub, Guildford

Knowledge of system

Levels of knowledge about FHRs varied across the food business sample we spoke to. Some had a very thorough understanding and could speak confidently about the different elements of the rating; this tended to be either because they had been trained in current or previous work environments where inspections were taken very seriously, and/or because they were attempting to instil this kind of culture around the FHRs system in their own businesses.

However, others had much more scant knowledge and understanding; indeed, some of the businesses we spoke to were actually unaware that they had received inspections. A couple of food businesses we spoke to were under the impression that they were not in the scheme and thought that it was something that they needed to set up themselves; they did not realise that they did have ratings.

“I don’t really know [the rating]... I think it’s round about the four or five level.”

Mobile unit, Manchester

“We’ve been so busy since opening, we haven’t had time to think about getting one.” Tea room, Wrexham

“I haven’t got the time to sort things out so that we do fit the criteria for it.” Take away, Wrexham

Food business participants’ knowledge about how frequently they were inspected and how frequency was decided varied. Most assumed that frequency of inspection related to their most recent rating – that is, that lower-rated businesses would be inspected more often – but that if any issues were reported that might also act as a trigger for inspection.

“We’ve always worked to the assumptions that if we get 4 or 5 stars, we get 18 months. If we get 3 stars or less then it’s 12 months or less.” Restaurant, Nottingham

“I’ve always understood this, although I don’t know this 100%, but I would say that normally if you get a 5-star rating, I’ve had 5 stars in other places as well over the years, normally it’s around about a year to 18 months, they say, for a reinspection. Now I presume, I’ve never had anything below a 4 anyway, so I’m pretty sure the lower the rating there’s a more urgency to check then.” Pub, Swansea

“I know that if you have a lower food rating, so you’re considered more of a risk, they come to you a little bit sooner, but other than that I think it is just annually.” Nursery, Cardiff

A couple of food businesses referenced the fact that they had a ‘pretty good idea’ of when they would next be likely to receive an inspection. They based these ‘guesstimates’ on previous history in terms of inspection frequency and on the basis of reports from other local businesses. They found this advantageous as it gave them some time to prepare – but obviously if these perceptions of being able to ‘roughly guess’ inspections timings are correct, this somewhat limits the power of the ‘surprise element of inspections, which should not be able to be ‘prepped’ for. It is also worth noting that across locations, the idea that inspections should be unannounced and unexpected was critical to consumer confidence in the scheme.

“The Gower Peninsula has got lots of pubs and restaurants and everybody knows everybody else. So all of a sudden, one particular place says ‘the health inspectors have arrived’, next thing somebody’s on the phone and they will phone every other pub down there and say ‘Look, we’re having a visit up here, the probability is you’re going to get one today subject to how long they are here, or it’s going to be tomorrow or the next day’.” Mobile unit, Swansea

Other businesses had less of a sense of when they could expect an inspection. The unannounced and unexpected nature of inspections was a source of discomfort for these FBOs, but they also recognised that it forced them to keep their standards high.

“Oh, it’s hard, you think ‘sod it, I won’t bother’ but an inspector could turn up. So after every session all the microwaves are wiped out, all the surfaces are cleaned down, everything’s anti-bacterialised, you do that whether you’re on your last legs or not and you do it because you can’t... not only because you want to be clean but, I’d get away with it if I didn’t occasionally, but I can’t afford to have a knock on the door at nine o’clock and the EHO walks in and says “let’s have a look at your kitchen. My God, there’s crumbs, there’s potential infestation for rodents”, all this. You can’t have it, so knowing that they like to turn up out of the blue is an inspiration to keep standards high, there’s no doubting.” Pub, Guildford

“Oh you do feel it, the nerves kick in, oh no what’s going to happen here. But they are doing their job, and I’m trying to do mine, and I keep it in good shape. So you just let them in and get on.” Convenience store, Derry

Personal use of FHRS

Amongst the food businesses we spoke to, behaviour varied in terms of the extent to which our FBO participants themselves paid attention to the ratings of other food businesses. Some felt that it was not hard to expect a place to achieve a high score and so might question a lower rating; others thought they might be more forgiving of a low rating of a place they thought was likely hygienic, as they assumed they had been scored down on paperwork elements.

“I think if I was choosing somewhere to go out, if it was anything less than a 5 I would hesitate .. I just know what it is that you need to look out for, for your 5, as long as you have procedures in place it’s not difficult.” Café, Belfast

“If I walked into an establishment and it was a 3 to 4, anything below that I’d probably avoid. You know, a 4, I knew it had to be something simple like the paperwork was letting them down. Again, even a 3 could be minor issues that’s held them back. Anything below that and its serious issues that have been raised.” Canteen, Guildford

“I don’t think I’ve ever booked to go somewhere for dinner and checked the Food Hygiene rating... even if I went to a kebab shop and it had a 1 star on the outside, if I wanted the kebab I’d still go in and order a kebab. But that probably is just me.” Restaurant, Nottingham

Some businesses had started to take notice of FHRs ratings themselves, as consumers in other food establishments, since having been through the inspections process as a food business.

“I didn’t used to. It’s only the last few years that I’ve started looking.” Café, Manchester

“I didn’t really even realise that I was going to have to register until someone thankfully mentioned it to me. Then I kind of realised registering means you get this rating and, of course, I’ve since noticed this rating all over the place, in all sorts of cafes and restaurants and everything.” Home baker, Farnham

3.3 Response to impact of risk segmentation on FHRs

After first understanding spontaneous views and perceptions of FHRs, and in the case of the public sample also allowing deliberative discussion and reflection with FHRs expert stakeholders, we introduced the idea of taking a risk segmentation approach to FHRs inspections. This topic was initially introduced via standardised stimuli to ensure a degree of consistency in presentation; in the customer deliberative workshops, in the form of a slideshow presented by the lead moderator, and in the FBO depths, in the form of standardised descriptive text.

In each case, we described not just the potential changes to FHRs, but why these changes were being considered: to take a more efficient and effective approach to the inspection regime, and to be able to focus inspections investment on higher risk businesses. It should be noted that this ‘why’ framing, as well as the details of the proposed changes themselves, also shaped participant responses.

3.3.1 Consumers

Before exploring consumers’ prompted views to risk segmentation-based changes to the FHRs system, it is worth noting that in our initial exploration of the FHRs programme, most consumers had assumed that all businesses were and should be inspected in the same way. In sessions where we explicitly asked, prior to introducing information about the policy changes, whether all businesses should be inspected in the same way and at the same frequency – there was generally an instinctive consumer feeling that a standardised approach was ‘fairest’.

This initial assumption of fairness was quickly challenged as consumers considered that some businesses may present more risk than others. Likewise, participants’ initial gut reaction around the importance of a standardised approach quickly fell away as discussions evolved. However, this pattern of response suggests that it will be important that when reforms are introduced, the rationale behind this is carefully framed; if changes are presented out of context and without the ‘why’ behind the reforms, consumers’ first instinct may be that removing full standardisation is ‘unfair’.

Upon explanation of the ROF programme and having learned about the FSA's rationale behind a risk segmentation approach, consumers across locations were in favour of treating businesses differently depending on the number and severity of risk factors they presented. Consumers liked the idea of a risk segmentation approach. They saw it as freeing up resources for higher risk or non-compliant businesses; many spontaneously cited the need for local authorities to spend efficiently, and there was generally quite high awareness of challenges in relation to local authority budgets and spend.

“It frees up more time to look at the other ones if they are struggling to get round everyone.” Manchester

“I’m getting the sense that the FSA, I think, are feeling that they’re not covering the higher risk as well as they would like to because they’re spreading their resources over lower risk. I would definitely take the view that they should focus completely on this and, if these lower ones slip out the net, then so be it. It’s better that happens than we have gaps at this end].” London

While the idea of risk profiling itself was welcomed and seen as making intuitive sense, when it came to how this might impact FHRS, response was slightly more nuanced and varied. Most consumers were accepting of the idea of the lowest risk businesses being exempt from FHRS altogether, and of reduced frequency of inspections for lower risk businesses. However, there was some concern about excluding low risk businesses from physical inspections altogether.

Broadly speaking, consumers accepted the idea of very low risk businesses, for example, a newsagent selling only pre-packaged goods, being exempt from the scheme, not least because many of them had not realised that such businesses were part of FHRS in the first place.

“I would never have thought they had to have a rating? I’ve never thought to look on the door of them because I wouldn’t think that they were.” Wrexham

Participants recognised that, like themselves, most consumers would be unaware that these businesses fell under the inspection scheme, and so were probably unlikely to notice if these types of low risk businesses became exempt.

“I don’t really look [at ratings] when I get coffee.” London

“You’re not going to check [a low risk business like a newsagent] on the app anyway.” Manchester

Some participants even felt that it was ‘ridiculous’ that these smaller types of food businesses were in the scheme currently. For these people, it wasn’t that they didn’t mind lowest risk businesses being exempt; rather, they actively welcomed it. They felt that inspecting very low risk businesses was too ‘nanny state’ and wanted to see consumers take more responsibility for their own behaviour.

“They have these wee stalls, and wee Mrs Smith will be sitting there with her rhubarb jelly and stuff. She doesn’t need a certificate.” Belfast

**“I just think it’s a waste of time [inspecting low risk businesses] anyway.”
Manchester**

“You should know to wash your vegetables.” London

However, for some consumers there was a question mark over which food businesses would be made exempt, and where the line would be drawn to determine ‘lowest risk’. While participants recognised that the FSA were the experts in determining the risk of a food business, consumers’ intuitive perceptions of what was / was not low risk did not always align. Consumers sometimes instinctively felt that certain types of businesses could not be considered lower risk, for example domestic kitchens or mobile units.

“I think the home caterer needs to go in high [risk]... Because if they’ve got animals walking across them work tops.” Wrexham

Participants were also more confident about food businesses where they could see produce and / or have control over how it was prepared. For example, they were happy with the idea of a green grocer being considered a low risk business as they were able to go home and wash the items. Any business that involved cooking behind closed doors was deemed riskier as they could not see what was happening to their food.

“The thing about the greengrocers is, when you go to like a greengrocer and you buy fresh vegetables, I don’t, but my wife does. And then she prepares them in the kitchen, there is a visual inspection of what you’re buying. Because when you go and buy fresh fruit, it’s done all the time, you pick it up and you give it a squeeze, and you have a look at it.” Wrexham

Business scale also didn’t necessarily serve as an intuitive risk signal for our participants, though this is a factor in proposed risk segmentation. For some consumers it made total sense that businesses that had more customers needed to be monitored more carefully than those with fewer customers; however, others felt that this was irrelevant – to them it didn’t matter if one person was harmed or a hundred, the food business still needed to be treated the same way.

“Just because it affects less people I don’t think it should be lower risk. Like a B&B – because they could still get really ill... one person is enough.” Nottingham

“No, I don’t think a business canteen should be higher risk than the little shop, even if it’s hundreds or thousands of people. Even if it’s just serving one person –that one person matters right?” Derry

Food businesses selling dairy products were also more likely to be deemed risky, and consumers were often nervous about the idea of such businesses being exempt from FHRs.

“It’s the process of making the ice cream, can it not go off? I think the problem is that the whipped ice cream itself can be contaminated if it’s not stored properly. Or made properly. I think that’s where the high risk comes in even more so.” Belfast

“We all thought, because there’s more milk involved in it and keeping it cold etc, that was more risky, didn’t we?” Wrexham

Although, as discussed above, there was some discussion about what might or might not be considered low risk, plenty of consumers trusted the professionals to make the appropriate decisions. They were happy to weigh in on what felt risky or not to them personally, but ultimately assumed that the FSA would be making its risk segmentations based on good scientific evidence – and were happy to delegate decision making to that professional opinion.

**“Their [food inspectors are] in the know. They’re the professionals.... If it was high risk, they’d be inspecting them more. I think I just have my trust in them.”
Manchester**

Consumers also strongly felt that all businesses, even lower risk businesses, should have an initial inspection. They wanted reassurance that *someone* was checking that a business was doing what it said it was and was doing it properly. There was a sense that without this initial inspection, businesses may not faithfully report what they have on sale, or the cooking processes involved – and thus might look less risky on paper than they were in practice. They also felt that an initial inspection was important in terms of impressing upon businesses that hygiene was something important that is monitored.

**“At the end of the day, I don’t think you can get away with never inspecting it.”
Belfast**

“What if it’s a scruffy newsagent though? I think they should check once, but less frequently.” Manchester

“I’m fine with all of this, but even the ones that aren’t risky should have that first inspection. Every business should have at least one time where someone is actually in that shop taking a look.” Derry

After an initial inspection, consumers were happy for future inspections to be very infrequent for lowest-risk business, and in some cases they did not see the need for any further inspections. However, they did seek reassurance that even businesses that were exempt from the scheme or were inspected very infrequently would still be monitored, and that if circumstances changed, this would be picked up on.

“These ones – you might not check them, but if they get a bad review or someone makes a complaint, then they should [be inspected].” London

It should be noted that participants tended to assume that even ‘lower frequency’ inspections for businesses that remained in the scheme would take place every 2-3 years. In sessions where we explicitly asked participants to clarify what length of time would be acceptable to them, there was visible discomfort about the idea of non-exempt businesses being inspected only every 4 or 5 years (or certainly any longer); intuitively consumers felt that it was still important that roughly bi-annual or tri-yearly inspections take place to ensure that nothing has changed – even if this is a more minimal and streamlined FHRS contact. There is some risk that if consumers became aware of less frequent inspections that this could reduce confidence in the scheme as a whole for some.

Consumers also spontaneously mentioned the idea of food businesses having more random ‘spot’ checks to keep them on their toes and how appealing this would be to them in terms

of ensuring their own confidence in the FHRS system and in FBO ratings. Some reported expecting that a risk segmentation approach should free up investment for these kinds of 'surprise' inspections, thereby (in their eyes) raising the effectiveness of the scheme as a whole.

"It's so that you know that something is coming. So that they keep a certain standard, because they know that they can still get called up on it still." Swansea

3.3.2 Food businesses

The views of food businesses were very much in line with public opinion, with most FBO participants broadly accepting a risk-based approach, especially if it meant that resources would then be focussed on higher risk businesses. This was largely true even for the businesses in the sample that considered themselves as falling into the higher risk category, and thus likely requiring more frequent inspection than some other establishments.

"It makes sense, it will free up time .. it seems like a waste of time for them to be looking at the low risk." Caterer, Belfast

"That makes logical sense. Obviously I'd expect to be one of the more frequently inspected businesses because I have hot and cold food and we're cooking and there's sometimes vulnerable people coming into our café – but that's fine, that's as it should be." Café, Derry

"If it's genuinely low risk and people are reliable in informing people what they're doing, then absolutely. And it will obviously save revenue somewhere along the line wouldn't it." Childminder, Wrexham

Some of them had been unaware that certain lower risk businesses were currently in the scheme and agreed that it made little sense for them to be so.

"The old sweet shops that have got stuff in jars. I didn't know they got inspected." Restaurant, Nottingham

"I didn't realise that corner shops and all that needed it if I'm honest. I can't say I've ever noticed." Café, Manchester

Most FBO participants agreed that most consumers would be unlikely to check the ratings of lowest risk businesses, let alone the date of the last inspection – and some felt that consumers should take more responsibility as well.

"For the general public, I don't think it would make any difference whatsoever, to be honest, because nobody looks at the back of the sticker." Café, Farnham

"You're talking about a pretty shrewd consumer that cares about a newsagent having a food hygiene rating." Restaurant, Nottingham

"If they weren't selling chilled items or frozen items then, yes. Then they don't need to be inspected, you just hopefully rely on them to do a stock take and then it's down to the general public to make sure they check the use by dates on produce." Canteen, Guildford

Like the public, many also felt that newly registered food businesses would benefit from an initial inspection. This was partly because they felt that some businesses might try to ‘get away with things’ without this safeguard, but also some food businesses felt that the initial inspection could be a really helpful way to support businesses just starting out. It was felt that some businesses might accidentally be doing things wrong and an initial inspection could set them on the right track.

“Obviously it sounds quite logical that if the newsagents was only selling stuff that was very low risk food that didn’t need to be refrigerated, that you’d think ‘okay, they don’t need to be inspected’, but the thing is it potentially is idealistic because the newsagent might inadvertently without realising start selling doughnuts with fresh cream in. I think when someone first registers, a visit is important regardless of what they’re selling, because also it lets people know that people are keeping an eye on them, but also, like I said before, there were genuine question I had that it was really helpful for her to answer.” Home baker, Farnham

Again, similarly to consumers, food businesses agreed that some types of low risk businesses could have less frequent visits, but they did not like the idea of them being taken out of the system altogether.

“I think less frequent inspections for them, the newsagent that only sells some milk and a few bits and pieces maybe but, to take them completely out of the system, no, no.” Canteen, Guildford

“They’ve got a sell by date on them and, if they’re not being sold within date, then that’s a problem, and so therefore yes, they do need inspection, an out of the blue inspection as opposed to prearranged. But it’s absolute sense, if you’re just selling sweets and things, why go, what a waste of time. You’ve got to use your resources sensibly.” Pub, Guildford

The importance of random ‘spot checks’ also came up with food businesses. Many businesses felt that in the current system there was a danger that because businesses knew roughly when to expect an inspection, they might not be as careful about hygiene standards when they were confident that an inspection was not imminent. Again, there was some expectation that a review of effectiveness of the inspections regime should consider re-investing any ‘saved’ resource resulting from a risk segmentation approach into ensuring more of these ‘surprise’ inspections can take place.

“They should always say ‘we will come at some point but it might be this year, it might be in five years’ time’. So you can’t just sit back on your laurels and think ‘oh well, let it go to pot, they’re not coming’. You have got to still have that, that people are going to be responsible, you don’t know if an inspector’s going to come and knock on your door so you have got to be more responsible.” Café, Guildford

3.3 Response to impact of PA NIS on FHRS

3.3.1 Consumers

Consumer views on the acceptability of primary authority national inspection strategies, specifically the idea of FHRS ratings being refreshed or renewed based on evidence other

than a physical inspection by a local authority, were much more varied those towards risk segmentation reforms. Perceived acceptability depended on a number of different factors, including:

- The type of food business
 - By and large, consumers were more open to the idea of a food business premises being given a rating based on evidence if that business was a retailer rather than a food business preparing or cooking food on site (with retailers that prepared or cooked food on site e.g. rotisserie chicken, sitting somewhere in the middle). This tied in with consumer views on risk, where businesses that did not directly handle food or where food did not go through multiple processes were seen as lower risk.
- The frequency of physical inspections
 - Consumers were also more accepting of the idea of a rating being based on evidence if they knew that the next physical inspection was not too far away – annual or even every two to three year inspections (for lower risk multi-site businesses such as retailers) were seen as acceptable, but anything less frequent started to become worrying for some.
- The organisation carrying out and paying for the inspection
 - This was not a topic that was discussed across all workshops; it was an issue that emerged in only some locations based on consumer question and answer sessions with attending expert stakeholders. Where it was, many consumers were concerned about the idea of the physical inspections being carried out by anyone other than the Local Authority or an independent consultant.
 - For example, most were highly critical of the idea of inspections being carried out by FBO staff⁴; although consumers felt that FBO-conducted inspections were useful and might feed into the overall data picture for a business, they did not want the inspections that generated an FHRS rating to come from ‘within the business.’ They felt that it was important that even if evidence was used to refresh ratings, when it came to potentially changing ratings, a physical inspection run by an organisation completely independent of the food business in question, ideally the LA.
 - Consumers also felt that who paid for these inspections was important. Where the potential for independent contractor inspections was explored, most felt that these contractors should either be paid by the local authority, or that the cost should be shared between the local authority and FBO. Many raised concerns about FBO-only funding of inspections by independent contractors. There was a sense that this might result in some contractors becoming more lenient for favoured customers; although it was discussed that these independent inspectors would likely be held to professional

⁴ This idea was only discussed with consumers in the Derry workshop

standards by their relative regulatory body, this was not enough to allay concerns.

In general, consumer views towards national inspection strategies were in part driven by larger attitudes towards ‘big business’, with some people more trusting than others.

Those who trusted larger multi-site businesses to provide accurate data were sure that because they had reputations to uphold, they would fulfil all their obligations when it came to hygiene standards. They often remarked on the fact that many of these chains already had ratings of 5 and felt that they would be anxious to maintain these.

“These companies have a lot to lose if those checks are not adhered to. I think let the resources of the FSA focus on the other businesses.” Nottingham

Several participants had worked for or knew people who had worked at larger multi-site retailers or restaurants and so had first-hand experience of their internal systems – they were confident that in many cases they were likely to be even more stringent than those required by the local authorities. They felt that it made sense that rather than duplicate what was already happening, the local authorities could then focus their resources on higher risk or non-compliant businesses.

“You’re not as worried about [the bigger businesses] because they have loads of people going in and out of their businesses that would pick if there as something wrong. I’m less worried about the Sainsbury’s and stuff like that because they’re so big they couldn’t afford to get a zero rating. It would be the death of Sainsbury’s.” Manchester

“I trust Tescos or Waitrose way above a local butcher because they’ve got millions to lose. This local butcher that’s just it, you’ve lost your business, you should have done better. The amount, like one bad word in a review and they lose millions of pounds in investments. So I just feel that they’re going to try harder.” London

By contrast, other consumers were much more cynical about some of the larger chains’ motivations and likely behaviour. They were concerned that these types of businesses might try to take advantage and manipulate the evidence if they weren’t being physically inspected. They worried that either head office would put pressure on managers at different sites who would feel compelled to cut corners or falsify the data.

“If it’s a supervisor or a boss of that company, then they’ve got that’s company’s best interests at heart, rather than the council or the consumer. They are thinking ‘well we need to keep this place open and keep it profitable because I want my bonus and I want my peers to be impressed.’” Wrexham

Some also felt that it would be unfair for independent food businesses if multi-site businesses were treated differently.

“There is a different rule for big business whereas a poor independent retailer has got to be subject to all this regulation... my concern is that these smaller businesses are going to continue to fade because they can’t keep up with the compliance and we are going to have even more Costa’s and Nando’s.” Nottingham

“Really what you are talking about is self-regulation... you are asking big business to look after big business .. you can't have total self-regulation which is what this is leaning towardsWe are asking the wee man on the street who has a chip shop to open himself up to these inspections ... but you are not asking the multi-nationals ... it should be exactly the same, I don't think self-regulation works in any aspect of life ... I would be concerned that people especially with the multi-nationals that they would be much more adept at hiding bad practice .. than the wee chippie ... If they knew they would have no inspection ... “The question is how much you trust big business, how much do you trust google or IBM to pay their taxes ... they will do the bare minimum to get away with it, why would we trust any other big business.”

Derry

At the workshops, participants were given a scenario to consider in which they had to compare a business that had had its rating refreshed based on evidence to one that had not. By and large, regardless of earlier discussions about the overall concept, most consumers felt that they would have few qualms about using a business that’s ratings had been refreshed based on evidence. When challenged on this (because this did seem to contradict earlier responses to the overall idea), it became apparent that when given a tangible example of how this might work in practice, consumers were largely reassured by the fact that a business would previously have had a high rating to have been able to have had it refreshed using evidence (as opposed to a physical inspection carried out by the local authority), and in the scenario given, the most recent physical inspection was only 2-3 years ago.

“Our group felt that we were all unanimously happy to purchase the items as they are major supermarket and regulated with good written policies recorded that they have been passed originally, previously.” Belfast

“We similarly felt fine about it [a multi-site restaurant whose last physical inspection had been in 2016 but had received a refreshed rating of 5 in 2018], but on the basis that the reassessment had been done following a few years, 2 or 3 years, where it had been at that level.” Wrexham

“They’ve already got a top rating, and it’s verifying that top rating so we were comfortable with that.” London

3.3.2 Food businesses

Similarly to consumers, response to the idea of multi-site businesses having their rating refreshed based on evidence was mixed amongst our food business sample.

Some food businesses were very accepting of the idea – like many consumers, they felt that this made sense as a more efficient way of using resources, particularly for lower risk businesses. These businesses were fairly indifferent to the idea as they did not see how it could adversely impact them.

“They’re such big corporate companies that I suppose they’ve got the manpower and the resources to pay for staff training, and they’ve got their own people that

inspect it as well. You've got your sort of manager that comes round, your fresh food manager, there's always people above them that are inspecting that they're doing their job. It's a little bit different I suppose, in the kitchen environment, because a lot of the time you're so busy." Pub, Swansea

Many also had experiences of working for larger chains and had seen how strict their own internal processes could be. They also discussed the fact that those types of businesses would have both the resources to mitigate any problems, and a reputation to uphold.

"I had one [internal inspector] who was looking round and he was so annoyed, really really annoyed, and he says 'I've never given 100% mark, never'. He was looking and in the end he found, it wasn't even me, it was one of the cleaners had left a bit of wire wool for cleaning a pan in the corner of the sink, he said 'I've found it, there you go, marked you down a point, 99%'. That, to me, is pathetic, you know this establishment's spotless and everything and you just pick up on something miniscule like that. To me, it's annoying. The [local authority] health inspector would have come in and gone 'brilliant, lovely, thank you very much, you're doing everything right. Just watch that, I'd rather you didn't use that and carry on'." Canteen, Guildford

"If a WH Smith sells gone off milk to someone, they would immediately refund the customer and it would, they wouldn't want a bad reputation for themselves. Also, with WH Smith, if a fridge is broken then they make a phone call and that fridge is fixed. And I think stuff like that a consumer knows, staff will know as well. If it's broke, they will get it fixed. I think with people like me, if the fridge breaks in there, I don't have the money to fix it, well just put your stuff in another fridge for now until I've got money to fix it. I think that's where people like me become a concern, over people like WH Smith which is a great example of someone that doesn't need it because I do think they are individually managed, so each person would look after their own shop floor." Restaurant, Nottingham

As per consumers, food businesses did seek reassurance that the multi-site businesses would continue to have physical inspections carried out by local authorities, even if these were less frequent – and that if there were any reported issues, they would also be inspected.

"Part of me thinks, well every business, if they're going to have a rating, should be inspected, and should be drop inspected at any point. But I suppose if a consumer alerts the local council to a local supermarket that they think is not having good practices, then they could do a drop inspection anyway." Tea house, Nottingham

However, other food businesses voiced concerns about the idea, particularly when it came to food businesses that were handling and preparing food on site (as opposed to retailers). Again, similarly to consumers, this was often driven by distrust in larger businesses, and a fear that data could be manipulated. They did not feel that chain / multi-site businesses could necessarily be trusted to maintain their standards without real oversight in the form of actual independent inspectors (as opposed to reports of internal inspections or audits).

**“To leave establishments for long periods of time to self-govern doesn’t work.”
Canteen, Guildford**

They often cited their own experiences of ‘dodgy’ practices at chain businesses. They also further emphasised their views that people get lax in the space between inspections – and that this would be the case here. Many also talked about the fact that staff turnover could be high in the food industry – and as a result things could change very quickly, for example, managers might have different standards or kitchen staff might not be as experienced. They also discussed the fact that management was not always consistent across different establishments, even if they were supposedly working to the same standards. They therefore felt that it was important to continue to have frequent physical inspections conducted by local authorities at local outlets to keep on top of such changes.

**“I think the visit is very important, they would need to be careful not to get focused on records... you always get a bit nervous when you see the environmental health officers coming across the car park, but it’s important... We have made changes in response to it – we see it as part of the day to day. If people know they are not going to be visited, they would slacken off [on the cleaning] and that causes problems.”
Caterer, Belfast**

“I think there needs to be a physical inspection at least once a year, just cause someone can take two hours out of their day and just fill out temp records for six months... you need to be able to physically see that things are clean... if you are preparing food you need to know that there is no risk of cross contamination.. you want to know how the kitchens presented .. I just don’t think when you are dealing with food and hygiene that getting sent documents is enough.” Café, Belfast

“I am just not so comfortable that records are enough to protect people from a poorly managed local store ... the fact that it's a chain should not absolve it from on-site inspection, as it is the practical processes that are important.” Cheesemonger, Belfast

“I go back to what I said about this Watchdog programme when they were checking the syphons. Most of them are all chain establishments, they’ve got these stringent rules in line, they weren’t being followed, they were being missed and that can be down to the management not checking on things being done. It’s easy to go ‘yes, I cleaned it’, right, just sign off on a bit of paper there ‘look, I’ve done it’” when it hasn’t been done.” Canteen, Guildford

“You can have a fantastic manager in one establishment, and then you can have one that’s only recently just trained.. and they haven’t got as much experience and they might miss things.” Tea shop, Nottingham

Many also felt that it gave chain / multi-site businesses an unfair competitive advantage over smaller food businesses – they thought it meant that they had one less hoop to jump through, and more opportunity to ‘play’ the system.

“You say these internal management checks, boxes will be ticked, but I can’t say they’re going to send people out to do it. It’s leaving the door wide open for all sorts of malpractice and none of us want that, we don’t want a bad reputation in the

industry, and we don't want the big boys to have too big an edge, getting away with it because they're big. It isn't fair on the smaller guys, because we've all got to operate as a unit, they should have to and they should be inspected exactly the same way." Pub, Guildford

Some also felt that it was even more important that chain / multi-site businesses were inspected (than smaller independents) because they were the places that had the largest number of customers – and therefore the greater risk if something were to go wrong.

3.3.3 Use of data

While this was not a topic that was intended to be explored in the research, both consumers and food businesses spontaneously brought up the idea of using data more generally to promote more efficient and effective inspections – and a fully modernised FHS system.

They felt that if it was possible for food businesses to give local authorities data, this would be an opportunity to simplify or streamline the current system – information could be more up to date, and physical inspections could be more focused on priority areas. They did not see why this could not apply to all food businesses, not just chain / multi-site businesses.

"If that means that instead of spending half a day there, the inspector can have checked things out on his computer and then maybe spend an hour or two there but not have to check as much, that's fine. Then he doesn't spend all his time travelling or at the restaurant." Derry

"I think putting stuff online, or having a system online whereby I can upload all my temperature readings, yes, it's good but they still need... I think it's a good way of going, it would make their jobs easier because they'd be able to, before they leave, check the establishment out, okay, they do this, they do that, fine. Come in, have a look round and then they wouldn't spend as long if there's major issues there, it will free them up a lot more but I think they still need visits." Canteen, Guildford

"I would say that rather than having all this paperwork all the time is that you'd have an iPad, and certainly with technology the way that we are today it's moving so quickly, that the chef could just type in the information, 'what have you cooked today', you just type in "I've made a chicken curry, core temperature, cooling time". It could be all uploaded on like a Cloud system, or whatever they call it, and then that could be recorded and sent to the EHO of Swansea. So if they can say 'hang on now, someone hasn't filled this out for yesterday", there could be like maybe even a fine, 'you're not keeping your records up to date and this needs to be done daily'." Pub, Swansea

"It could be a more focussed inspection." Nursery, Cardiff

3.4 Communicating changes to the public

3.4.1 Communicating broader changes

Over the course of the workshops, regardless of earlier discussions, at the end of the day we saw that most consumers left the sessions relatively unperturbed about the impact of the

ROF reforms on FHRS. While they wanted reassurance that high risk businesses would continue to be inspected on a regular basis, they did not feel overly perturbed by the idea of lower risk businesses being inspected less frequently or potentially being out of scope of FHRS, nor did they worry unduly about some multi-site businesses having their ratings refreshed based on evidence, as long as they continued to receive physical inspections from the local authority between times.

However, initial responses were often less positive than this, and so communications will be critical to avoid knee jerk assumptions of ‘unfairness’ or ‘cost cutting’ exercises. Framing of the policy will be critical; if consumers simply hear that some businesses are having fewer inspections, or the focus is on the length of time that might go between inspections for lower-risk businesses, this is likely to cause alarm if taken out of context. This could present some risk in terms of reducing what was very high overall trust and appreciation of the FHRS system amongst our public sample and, to lesser extent, much of our FBO sample. In particular, consumers are likely to be intuitively uncomfortable with the idea of inspections taking place less frequently than every 2-3 years.

The main potential backlash areas we identified were as follows. If policy adaptations eventually included any of the below outcomes, or are perceived to be by the public, this is likely to cause alarm and potentially reduced trust in the FHRS.

- Stopping physical inspections by local authorities
- Businesses not receiving an initial inspection to assess risk
- Long periods of time between inspections (3+ years⁵)
- FBO-only paid and conducted inspections generating FHRS ratings (*N.B. discussed in fewer sessions, but strong emotions about this issue where raised*)

“The minute you start saying you’re not doing the inspections, they’re [consumers] not going to be happy.” London

3.4.2 Communicating impact of risk segmentation on FHRS

Most consumers could not see a significant issue with a situation where two similar businesses were treated differently (i.e. one business have a rating and one be exempt) because these tended to be the types of businesses that they had not associated with FHRS.

“We didn’t have a clue until now, did we, about these things? So people just wouldn’t think about it, would they?” Swansea

However, a handful saw potential for confusion – and that they might err on the side of caution and opt for a business in the scheme over one that was exempt. A few were concerned that exempt businesses might lose out on custom as a result, through no fault of their own.

⁵ While this may currently be the reality, most consumers assume that they are not more infrequent than this

“It might be an unfair disadvantage to the newsagent that doesn’t sell food and doesn’t have a sticker.” Nottingham

There was also some concern about lower risk businesses having less opportunity to improve their rating if they were inspected very infrequently.

3.4.3 Communicating impact of national inspection strategies on FHRS

Views were split as to how best / whether to communicate when businesses had had their ratings refreshed based on evidence.

Some felt that the information should be made available (i.e. online) but that it did not need to be put on the sticker. They felt that most people did not pay close attention to the sticker beyond looking at the overall rating, and by providing further information, it might be opening up a can of worms i.e. further complicating matters and therefore confusing people unnecessarily.

“Nobody looks at that [the date]. We just assume that it’s correct.” Belfast

“Leave it a-5 and if people want to dig deeper [for a date of last inspection] then they can go online.” Nottingham

“Because when you say it’s based on data, what does that mean to the person that’s looking at it. What data, how did it work? It’s good enough for the FSA, they gave it a 5, it’s good enough for Joe Public.” London

However, others thought that they should be differentiated between for transparency’s sake. They felt that it would be relatively straightforward to add another sticker or put an additional date on the back of a sticker that simply said ‘confirmed on X date’.

“You could have different colour stickers so if a local authority has gone in there its green and if it’s been done by themselves then its orange and then you can make an informed decision about whether you want to go in there.” Manchester

4. Conclusions

Consumers are positive about FHRS, finding it useful and trustworthy, and while some food businesses had some criticisms of the scheme, they generally thought that it was important that it existed because it encouraged businesses to maintain high standards, ensuring a level playing field. The vast majority of consumers (and most food businesses) recognised that by making these changes to physical inspections as part of the ROF programme, regulatory resources could be better concentrated on those food businesses that really needed it i.e. those just starting out, those getting consistently low ratings, and those with the highest risk profiles, and for this reason, they were generally in favour.

However, some reassurances were required to ensure that these changes do not have an adverse impact on the positive impressions people currently have of FHRS:

- That money saved WAS directed to other food businesses – i.e. that it wasn't just a cost cutting exercise.
- That most food businesses would expect to have some physical inspections – even if these were very infrequent – to 'keep them on their toes'.
- That all businesses would have an initial inspection to assess risk.
- In more engaged groups (especially Derry): that inspections would not be conducted or fully funded by FBOs themselves.