## The value of the Food Hygiene Rating Scheme: Business research

Maes o ddiddordeb ymchwil: Research projects

Statws y prosiect: Wedi'i gwblhau

Awduron: Ipsos UK

Cynhaliwyd gan: Ipsos UK and Food Standards Agency

Dyddiad cyhoeddi: 10 Mawrth 2023

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## Value of FHRS Business Research: Executive summary

Results available: Results available

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### **Background and objectives**

The Food Standards Agency (FSA) is responsible for food safety across England, Wales, and Northern Ireland. As part of its work on the Achieving Business Compliance (ABC) programme, the FSA wanted to understand in more detail how Local Authorities (LAs), businesses and consumers feel about the current Food Hygiene Rating Scheme (FHRS). In addition, the FSA wanted to capture consumer views on potential changes to the regulatory approach. To this purpose, the FSA commissioned Ipsos UK to conduct qualitative research to explore the views of businesses about the FHRS.

### Methodology and sampling

- the research involved a series of depth interviews with food businesses from across England, Wales and Northern Ireland. This included small, medium and large business, and business of different types
- across the interviews, 56 participants took part in the research 20 businesses from England, 14 businesses from Wales, 12 businesses from Northern Ireland, and 10 large businesses operating across all three nations. 40 small businesses, 6 medium businesses, and 10 large businesses took part in the research.
- discussions included businesses' views of the current FHRS, how it works in practice from
  their perspective, and their perceptions of the value of the FHRS. Businesses were also
  asked about their views on inspection frequency, mandatory display, and whether the
  FHRS was fair or unfair. Finally, businesses discussed how the FHRS could be improved.

### **Key findings**

#### The value of the FHRS

Many businesses across all three nations were positive about the value of FHRS. However, a small number of businesses felt that the FHRS offered limited or no value to their business. The main areas of value businesses associated with the FHRS were around supporting compliance and customer engagement:

Businesses of all sizes discussed the value of the FHRS for understanding how their business was performing in terms of food safety and hygiene compliance. Having an independent assessment from a third party was seen as valuable for ensuring that they were complying with hygiene standards.

Many businesses described the FHRS as important for customer engagement, emphasising the role of the FHRS rating in attracting and retaining customers. However, other businesses thought there was less value around customer engagement because in their experience consumers did not pay attention to FHRS ratings. In particular, some businesses in rural locations said that because of a lack of alternatives, customers would buy food from them regardless of their rating. Large businesses also saw less value for them around customer engagement, suggesting that customers did not seem to consider FHRS ratings before buying food from them.

There were other examples of value from the FHRS, but these were less common. For example, some businesses discussed the role of the FHRS in enabling them to trade through online aggregators (for example, Just Eat, Deliveroo and Uber Eats), and others mentioned the role played by their FHRS rating when applying for insurance policies.

### How do businesses view the frequency of FHRS assessment?

Overall, businesses wanted to see FHRS assessments happening at least as frequently as they currently do. In Wales, small businesses generally said they would like to receive inspections annually, and Northern Ireland followed a similar pattern, with most favouring inspections every 12-18 months.

In England, recent experiences of delays between inspections appeared to shape expectations for future inspection frequency. Even so, businesses in England tended to favour inspections at least every two years.

Businesses could generally see benefits to reduced inspection frequency based on compliance. They generally felt that compliant businesses were unlikely to change their practices as a result of less frequent inspections. Some also suggested it could help focus resources on less compliant businesses. However, businesses also discussed that changes in management or high staff turnover should result in an inspection, rather than relying on previous evidence of compliance.

Despite supporting reduced frequency based on compliance overall, a small number of businesses in all three nations had concerns about reduced inspection frequency for high risk businesses specifically. They felt there was a reason these businesses were considered higher risk, and this should be reflected in how often they are assessed as part of the FHRS.

### How do businesses view the mandatory display of FHRS ratings?

Businesses generally supported mandatory display of FHRS ratings. Across all three nations, businesses thought mandatory display helped to improve customer confidence and encouraged compliance with food hygiene standards. However, there were some concerns around fairness,

as described below.

In Wales and Northern Ireland businesses wanted mandatory display to continue. In England, where the display of FHRS ratings is currently voluntary, most businesses felt that mandatory display should be introduced.

Support for mandatory display was consistent across businesses of different sizes. Many large businesses already asked their premises to display FHRS ratings in England, where display is voluntary.

#### Do businesses view the current scheme as fair?

Overall, businesses described the FHRS as fair. They linked this to the standardised nature of the scheme and clarity about what was needed to achieve a high rating. However, they highlighted some concerns around the consistency of the scheme, unannounced inspections and administrative burden.

A lack of consistency was a common concern among large businesses. They cited ratings they felt did not reflect the practice in a specific premises. While small businesses were mostly positive about consistency, a few shared similar concerns, focusing on differences between individual inspectors.

Some businesses felt unannounced inspections made the FHRS fair because this approach meant that businesses could not prepare and that inspections therefore reflected normal practice. However, some small businesses felt unannounced inspections were unfair as businesses might be caught on a 'bad day' and have that rating for a long time.

Concerns were raised about the administrative burden associated with the FHRS for small businesses with limited resources. Many of the businesses who raised this issue had themselves received higher ratings.

### What improvements do businesses suggest to the scheme?

Most businesses described the current scheme as working well, and often struggled to suggest specific improvements. This was particularly the case for small businesses. Instead, suggested improvements tended to focus on small amendments to make the scheme more effective in achieving its objectives.

These suggested improvements to the FHRS tended to mirror the concerns that businesses had about the scheme. They included improving the consistency of the scheme, and ensuring that the inspections focused on compliance with food hygiene requirements, rather than having too much emphasis on paperwork. Some businesses also suggested improving the clarity of the scheme for consumers, while some other businesses suggested moving towards a more collaborative approach to maintaining food hygiene standards, with food businesses and regulators working together.

## Value of FHRS Business Research: Chapter 1 Introduction

### 1.1 Background

The Food Standards Agency (FSA) is responsible for food safety across England, Wales, and Northern Ireland. As part of its work on the <u>Achieving Business Compliance (ABC) programme</u>, the FSA wanted to understand in more detail how Local Authorities (LAs), businesses and consumers feel about the current <u>Food Hygiene Rating Scheme (FHRS)</u>. In addition, the FSA wanted to capture consumer views on potential changes to the regulatory approach. To this purpose, the FSA commissioned Ipsos UK to conduct qualitative research to explore the views of businesses about the FHRS.

The overarching research objective for the business strand was to assess the perceived value of the FHRS for businesses.

The key research questions were:

- What do businesses value about the FHRS process?
- How do views of the FHRS scheme vary according to business type?
- How do businesses view the frequency of FHRS assessment?
- Do businesses use the FHRS scheme to assess other businesses that they are working with (relevant in Wales only)?
- How do business view the mandatory display of FHRS ratings?
- Do businesses view the current FHRS as fair?
- What improvements would businesses suggest to the FHRS?

This report sets out the main findings from the business strand of the research.

Alongside the evidence from the LA and consumer research, the findings will help inform the work of the ABC programme in the future.

### 1.2 Methodology

To answer these research questions, in-depth interviews were conducted with different businesses to explore their views. In total, 56 depth interviews were conducted with businesses across England, Wales and Northern Ireland. There were a broad range of businesses by different key characteristics, including business type, business size and current FHRS rating. The table below provides a breakdown of these businesses, by nation, size and type.

Table 1: Business sample breakdown

Business size	Number of interviews conducted
Small (less than 10 employees)	18
Small (between 10 and 24 employees)	18
Small (between 25 to 49 employees)	4
Medium (50 to 249 employees)	6
Large (250+ employees)	10

Nation	Number of interviews conducted
England	20
Wales	14
Northern Ireland	12
Large business operating across nations	10

Business type	Number of interviews conducted
Retail and accommodation (for example, hotels, shops and convenience stores)	25
Food and beverage services (for example, restaurants, pubs, cafes and takeaways)	26
Manufacturing and wholesale (in scope of the FHRS scheme)	5

Total: 56

Businesses were recruited in the following ways:

- the business had given permission to be recontacted for further research following a previous survey that they took part in for the FSA
- the business was on a commercially available list of businesses provided by DBS data solutions
- through the business' involvement with the FSA's ABC programme
- as a result of the business expressing interest in participating in this research.

The design and structure of the depth interviews was informed by the key research objectives. Depth interviews were recorded with the participant's permission to allow for a full analysis of views.

# Value of FHRS Business Research: Chapter 2 What do businesses value about the FHRS process?

Overall, most businesses said that they value the current FHRS, with many expressing positive attitudes towards the scheme. This view was generally consistent across the three nations, as well as across business size, type and FHRS rating. However, a small number of businesses felt that the FHRS offered limited or no value to their business. These differing views on the extent of the value offered are discussed in more detail below.

There were two broad areas of value that businesses discussed most often. The first was that FHRS offered a way of supporting them as businesses, in maintaining appropriate food hygiene standards. The second area was through displaying, or otherwise using FHRS ratings as a way of engaging customers and strengthening their business' commercial offer.

"I do think there's a value, because it helps me make sure that everything's in place." (Northern Ireland, small business (10-24 employees), 3 FHRS rating)

"It gives us [what] we need to improve or not. Giving a 4 still means we have to excel to 5, we haven't reached that final bar. It allows us to create that improvement that we need to work for, we're still working on it."

(England, small business (10-24 employees), 4 FHRS rating)

In England and Northern Ireland, most businesses felt the FHRS offered value to them in at least one of these ways. In Wales, many businesses thought the scheme had value for them, but overall views were more mixed.

The businesses who said that the scheme offered little value to them often linked this to their specific circumstances and focused more on customer engagement. For example, several of the

businesses in Wales that did not value the scheme, were small businesses based in rural locations. These businesses suggested that where they were located had limited the value of the FHRS, because consumers have few alternatives to use.

"I think if you were a city centre pub, it might make a difference, but out here in the countryside we're the only pub around, so I don't think it makes much difference." (Wales, small business (<10 employees), 5 FHRS rating)

"None [no value], so I've got to be honest, as I say, I've got my regulars, I'm busy all the time."

(Wales, small business (<10 employees), 3 FHRS rating)

### 2.1 Supporting compliance

Businesses frequently mentioned the value of the scheme for letting them know how well they were complying with food hygiene standards. Similarly, some businesses discussed that the FHRS gave them confidence that their own procedures were effective. They felt that having an external assessment was an important way of reviewing their operations and ensuring that they were meeting the required standards.

A few businesses discussed that FHRS inspections had identified issues with their food hygiene practices, and these businesses said that they had found the FHRS process to be useful for knowing how to improve their compliance. Some also mentioned the valuable support and suggestions offered by the local authority.

"The longer we go operating the way that we are, without having a third party that have the ability to shut our business down essentially, just checking in and inspecting us, there's constantly that risk that there's some gaping hole somewhere."

(England, small business (10-24 employees), 4 FHRS rating)

Large businesses also highlighted supporting compliance as an important area of value for them. They described the FHRS as helping them to maintain generally high levels of compliance throughout their business. Most large businesses achieved FHRS ratings of 5 across almost all of their premises. However, some explained that if a site received a lower rating, they would use this within internal performance reviews. A small number of large businesses mentioned that they also used their competitors' FHRS ratings as a benchmark to compare how they are performing within their own industry.

"We would establish what they've scored points on and where [they've] dropped points, and then we'd do coaching visits. Our [internal operational support leads] would go in and do coaching. Now, if it were a serious food safety thing, one of my technical team would go in so that they are then supporting the team. Sometimes it's a very simple thing, like they can't find the right documentation, and we can support them in organising that." (Large restaurant business)

"I think they play an important part in terms of keeping the culture in the right place within the business around food safety. It's really good, helpful, external view, external feedback on how we're doing."

(Large retail business)

"It gives us an opportunity to benchmark ourselves against other companies, which is invaluable, really."

(Large restaurant business)

### 2.2 Customer engagement

For many businesses, the main area of value offered by the FHRS was that the scheme helped with engaging their customers. This was raised as an area of value across businesses of different types in all three nations. Businesses explained that a FHRS rating of 4 or 5 ("good" or "very good") gave customers confidence and could also help attract new customers. Although many businesses in Wales felt FHRS ratings helped with customer engagement, there were more mixed views than in the other nations. This often seemed to link to the nature of the local economy, particularly in rural locations.

Some businesses argued strongly that the FHRS added real value to their customer engagement. They felt that customers made a conscious effort to consider, and look for, ratings, and if the businesses rating was low, customers would avoid using them. Some businesses also discussed more generally how they felt that FHRS ratings helped to ensure customer confidence in their business.

"A couple of weeks ago, we didn't realise our sticker had actually fallen off the window, so it wasn't there. It wasn't until a member of the public walked past, came inside to us. And as I say, we're 5, so we have nothing to hide but it was a member of the public came in and said, 'I won't be coming in here if you're not displaying your rating on the window.' We never even noticed."

(Northern Ireland, small business (<10 employees), 5 FHRS rating)

"Well, I think having a good score just inspires confidence. I don't think people would be coming to buy ice cream off me if we had a 2, to be honest because anything less than a 4 or a 5 is seen as, 'Don't go near.'"

(Wales, small business (10-24 employees), 5 FHRS rating)

Several small businesses of different types felt the FHRS had played a significant role attracting new customers to their business. This seemed to be particularly important where there was local competition among businesses of a specific type, such as cafes or takeaways.

"I'll tell you, it's bringing more business. If there is a good rating, people will just think it's a good shop, it's well cleaned, safe."

(England, small business (10-24 employees), 4 FHRS rating)

Others cited the growing influence of local media, including through social media. This was seen as having increased the importance of the scheme to both consumers and businesses, as discussed further below.

"I think more [value] now because people check. Years ago, people didn't check. Now they put it in local newspapers... and I think because it's been promoted more, customers are far more aware of it."

(England, small business (<10 employees), 5 FHRS rating)

However, a minority of businesses felt that the FHRS had little or no value when it came to engaging customers. Some businesses across all nations felt that customers do not check or pay attention to FHRS ratings, even in Wales and Northern Ireland, where it is mandatory for the ratings to be displayed.

"I don't think it would necessarily draw in many customers, because the competition here in the city is very high, but I would say there are a minority of people, maybe it could be 10%, 15% of customers that that would be an important factor when it came to deciding their dinner for that night."

(Northern Ireland, small business (10-24 employees), 5 FHRS rating)

Some businesses argued that a lack of alternatives meant that FHRS ratings were less important in practice to consumers in their area. The businesses that discussed this tended to be in more rural locations – although not exclusively – and pointed out that they had a regular customer base who they thought would stick with them even if they received a lower FHRS rating.

"I'm sure it does to a handful, but I don't think it would be enough that would affect the amount of business. I think you might lose a very small percentage if you had a low score. But I think people make an assessment based on their own gut instinct when they come into a place."

(England, small business (10-24 employees), 4 FHRS rating)

"Again, I think because of where we are, it's all about building reputation. The village here is probably 100 people maximum that live here full-time. Lot of farms. It's quite a good selection of people, the little surrounding villages. It makes no difference, it could be a zero, but they would still come."

(Wales, small business (10-24 employees), 2 FHRS rating)

Related to this, some businesses across all three nations felt the value of the FHRS was limited by a lack of awareness and understanding among consumers. They felt that most people did not understand FHRS ratings and what is considered in the final rating awarded. For example, a few businesses thought consumers assumed quality of food was a key part of the assessment. These businesses suggested that a renewed awareness campaign or refresh of the scheme could help to address this.

"I don't think it offers any value. As I say, they think that 5 stars means that your food is fantastic."

(Northern Ireland, small business (<10 employees), 5 FHRS rating)

"I don't particularly like the scoring because I think the general public's perception of the scoring, they're not educated on it enough. They just think it's about cleanliness, and not necessarily about the paperwork that goes behind it. Sometimes they'll see a 2 and think that must mean it's disgusting and they're serving bad food, whereas actually it could just mean that it was a bit of paperwork lost, or it wasn't in the office at that specific date."

(Wales, small business (<10 employees), 3 FHRS rating)

Overall, large retail businesses tended to think that there was less value for them from the FHRS in terms of customer engagement. They felt this was more relevant to small and medium businesses. Instead, large businesses emphasised the value for maintaining food hygiene standards across their premises.

"I think, if you got rid of it, you're going to need to find something that fills that space because it has been so useful to us in terms of compliance. But as a communication tool to customers, I'm not convinced at all on it."

(Large retail business)

Large restaurant and takeaway chains were more likely to say the scheme had some value for engaging customers, although this was typically framed negatively – i.e., that lower FHRS ratings would damage customer engagement, rather than higher FHRS ratings attracting customers. For example, one restaurant chain argued that if they had premises with low ratings, this low score would damage their reputation. Likewise, a national takeaway chain felt it had value here. They explained that their customer surveys do not directly address the FHRS, but that customer interactions suggest it may have some importance.

"Because of the size and scale of our brand, the general public would generally expect that we have 5s or maybe 4s, and I think anything less than that could damage our reputation and result in less customers coming in."

(Large restaurant business)

"We've just got this gut feel that it's the most important thing to our customers." (Large restaurant business)

Other large businesses did not think FHRS ratings made much of a difference to consumers. They supported the view that consumers did not generally understand the scheme and that this limited its value. For example, one national restaurant chain argued that it is not relevant to customers, and they felt that more could be done to promote the scheme, so that it is closer to achieving its intended purpose.

"I'm not entirely sure customers understand. I know it might say, 'Generally satisfactory,' next to a 3 or, 'Good,' for a 4 or, 'Very good,' for a 5. But, if I'm honest, I really don't think customers fundamentally understand what that means, as in if you get a 0, does it mean you've got pests? If you get a 1, does it mean you've got unsafe food? Consumers, I don't think, fundamentally understand what food hygiene ratings mean."

(Large retail business)

### 2.3 Other aspects of value from the FHRS

In addition to supporting compliance and engaging customers, businesses highlighted a range of more specific examples of value from the FHRS. These examples were not raised as frequently, and often only by a small number of businesses. These aspects were not linked to particular business types or different nations but seemed to reflect the specific circumstances of the individual food businesses.

#### Insurance cover

A few small businesses had been asked for their FHRS rating when applying for business insurance cover. These businesses did not know what role FHRS ratings might have played in influencing insurance cover or premiums.

"I actually think [insurers considering FHRS rating] is quite a good thing. I'd like to think that people that are trying harder probably seem at less risk to the insurance company than someone who isn't trying."

(Northern Ireland, small business (10-24 employees), 5 FHRS rating)

Those who had been asked to provide details of their FHRS rating when applying for insurance also had different viewpoints on this. One business said that they did not know why they had been asked for these details and did not know whether it had made a difference to their premium. Another business, who had been given an FHRS rating of 1 at their last inspection, thought how ratings were used varied between different insurance providers. Despite having been refused cover by their previous insurer, when they approached a new provider for cover, they have not been asked about their FHRS rating.

"All of a sudden, our business insurance asked us for our hygiene rating, we told them that it was only 1 star and they didn't want to insure us anymore. So, I had to go around and look elsewhere for a business who wanted to insure us. There was one that wanted to, and we haven't had any problems since, and the rating hasn't changed, so not sure why an insurance company might want to refuse any insurance based on food hygiene rating." (England, small business (<10 employees), 1 FHRS rating)

"We are asked, for insurance, what our hygiene rating is. Yes. What difference it makes to the premium, I've got no idea."

### Social media and online aggregators

A few small businesses mentioned that they display their FHRS rating on their social media and website, although there was no pattern in terms of business types and nation. Among those who did display it on their social media and website, they argued that it makes sense to include it as it is another way of promoting how well they were performing to their customers, and that this could increase trade. Some noted that when they had a lower rating previously, or if they were to receive a low rating in the future, they might be unlikely to display it.

"Yes, it goes on Facebook, it goes on all the windows around the place on the outside. So, it's advertising that side of stuff because it's a big plus point to have."

(Northern Ireland, small business (10-24 employees), 5 FHRS rating)

"We have it up in the shop that we've got a 5, but I don't think we advertise anywhere else."

(England, small business (25-49 employees), 5 FHRS rating)

Across the different businesses included in the research, only a small number were registered on online aggregators like Just Eat, Uber Eats and Deliveroo. Others did not offer delivery or delivered themselves. This meant that few businesses placed value on the FHRS rating in terms of being able to trade on these platforms. However, those small and large businesses who used online aggregators for delivery emphasised that it was important to them to trade in this way and recognised the role of FHRS ratings in being able to do so. One medium business explained that the FHRS did not offer additional value for them in relation to online aggregators, because they have only ever received FHRS ratings of 5 for their premises. They had not needed to worry about being removed from the aggregator platforms due to their FHRS rating.

"The [online aggregators] link into it now, although quite interestingly I think Deliveroo, because we work with them, don't accept anything below 2. Although I've got a couple of stores that have got 2-star ratings. Prior to that, they'd accept a 0." (Large retail business)

"We've always been a 5, the last while anyway, and I don't ever remember a case where I was told that we need to be above a certain rating, but it's making a bit of sense now because I don't think there's anyone on there that's not at least a 3."

(Northern Ireland, small business (10-24 employees), 5 FHRS rating)

"We work with Just Eat and Uber, and obviously if a rating is particularly low, then it does mean that they will take that restaurant off the delivery platform, so they'll no longer be able to do delivery until such time as they get an improved hygiene rating back again." (Large restaurant business)

# Value of FHRS Business Research: Chapter 3 How do businesses view the frequency of FHRS assessment?

Businesses were asked for their overall views on FHRS inspections, including their preferences around inspection frequency. It is important to note that many businesses referenced the impact of the COVID-19 pandemic when discussing inspection frequency. There was some confusion

about whether the length of time since their previous inspection was because of the pandemic, or whether the timing reflected how the scheme had operated previously.

Reflecting the pandemic context and the range of businesses included in the sample, recent experiences of inspection frequency varied considerably. Some businesses said they were inspected once or twice a year, while others said it had been as long as five years since their most recent inspection.

### 3.1 Preferences for frequency of inspections

Across all three nations, businesses typically wanted to have inspections at least as often, or more frequently, compared to their current situation. In Wales, small and medium businesses generally said they would like to receive inspections annually, and Northern Ireland followed a similar pattern, with most favouring inspections every 12-18 months.

In England, small and medium businesses were more likely to say that it had been more than two years since their previous inspection, than businesses in Wales or Northern Ireland, linking this to the COVID-19 pandemic. This appeared to shape their expectations for how often inspections would happen in future. Even so, businesses in England tended to favour inspections at least every two years.

In contrast, a few of the smallest businesses said they would not want more frequent inspections, and that they were content with the current frequency. This was influenced by pressures on resources that they associated with inspections.

Businesses' reasons for wanting inspections every 1-2 years, linked to the value they placed in the scheme, as discussed in Chapter 2. In particular, those who valued the role of FHRS in maintaining compliance and managing standards wanted inspections frequently enough to ensure they had an independent view of whether they were meeting food safety and hygiene requirements. This was the most common reason for wanting frequent inspections.

"I just thought it would be a big effect on how I feel, keeping a better eye on people's scores and make sure that the hygiene is keeping up to standard."
(Wales, small business (<10 employees), 3 FHRS rating)

"Well, I think a year's a fairly reflective time scheme against the business, and I think a lot can change in a year, a lot can stay the same in a year depending on your business. So, I think that's a fairly regular timescale to say."

(England, small business (10-24 employees), 5 FHRS rating)

A few businesses suggested that they should receive less frequent inspections because of the lower risk nature of their business (e.g. dealing with pre-packaged foods only). For example, a community food bank in England said they felt less frequent inspections would be appropriate because they felt the risks to those who used the food bank were low. Likewise, a specialist small food business said they were open to inspections happening less frequently, and thought this would be appropriate given the nature of their business. However, other similar businesses wanted their inspection frequency to be in line with other businesses overall.

"For the likes of us where things don't change that often, it works fine. I think for takeaways and your food preparation places I think they should be inspected more frequently."

(England, small business (<10 employees), 5 FHRS rating)

Views about inspection frequency were more mixed among large businesses. On the whole, they wanted inspections at least every two years, because they felt that less frequent inspections

would undermine the value of being part of the FHRS. However, most supermarket chains argued that their internal procedures meant they did not require inspections as frequently. They felt it made sense for the FSA to prioritise other smaller food businesses where systems and structures for ensuring compliance might not be in place.

By contrast, a few large businesses were frustrated that they had premises which had not been inspected for several years (three or more years). They felt that inspections should be more frequent to maintain the value and integrity of the scheme. One supermarket referenced inconsistent inspection frequencies across their stores, suggesting that inspections happened less frequently in England than in Wales, despite the nature of the business and associated risks being the same across the different nations.

Some businesses with FHRS ratings of 3 or less wanted more frequent inspections than they currently received. They felt this would help them address suggested improvements and demonstrate that they had changed how they operate. Linked to this, some of these lower rated businesses argued that the way the scheme currently operates means that they can have a lower rating for a long time. Some also did not want to pay the cost of a re-assessment visit and were concerned about waiting longer than expected for a regular scheduled inspection.

"When you get a low grading obviously you feel annoyed and upset that you've got a low grading. My grading won't change unless I pay for someone to come and do a reassessment. That's what it says. So even though I've called them and asked them to come back when I'd done the work that was asked, they haven't been back and that's 2 years down the line."

(England small business (<10 employees), 2 FHRS rating)

### 3.2 Less frequent inspections for businesses with a good record of compliance

Businesses were asked for their views about less frequent inspections for businesses with a good record of compliance. On balance, businesses across each nation broadly supported this idea in principle, although there were concerns, and a small number of businesses were not in favour of this. Some businesses also discussed how they felt reduced inspection frequencies were already happening within the scheme because of COVID-19 and more general resourcing pressures.

Businesses who supported less frequent inspections did so because they thought it was unlikely that a business would change its practices following an extended period of compliance with food hygiene standards. Others also suggested that less frequent inspections could work as an incentive for businesses to seek to achieve and maintain compliance. Some businesses also argued that it would free up FSA and local authority resources to focus on businesses that were in greater need of inspections. Support for reduced inspections was consistent across all businesses with different FHRS ratings.

"I think if they have got a consistently good track record, yes, I have the sense I think it needs to target businesses that aren't quite reaching the standard." (Wales, medium business (50-249 employees), 5 FHRS rating)

"Yes, I mean, if somebody's got a good track record, let them get on with it. Maybe inspections should be just something like popping in for a quick chat, just to say, 'Have you got any concerns? Can I give you any more information?' Rather than it being a full-on inspection every time."

(England, small business (Between 10-24 employees), 5 FHRS rating)

"Yes, in that case, I think it would make sense. It would make sense if someone was getting good reviews over some period of time, yes, it would be reasonable to think that their standards are up to a really satisfactory level all the time. So, it would make sense to do these less."

(England, small business (Between 10-24 employees), 5 FHRS rating)

However, many of those who supported less frequent inspections in principle noted that any change in management – or a significant amount of staff turnover – should result in a return to more frequent inspections.

"If they consistently scored well it wouldn't need to be so frequent, I think. If there was a change to management and standards were slipping you wouldn't pick up on it as quick, which is the only downfall."

(Northern Ireland, small business (25-49 employees), 5 FHRS rating)

It is also important to note that business' perceptions of what it meant in practice for inspections to be less frequent varied. This was based on how often they thought inspections should happen overall and their different experiences of inspection frequency over recent years. In England, a longer time between inspections was reported to be more common, and this seemed to shape views. For example, one business in England said that having an inspection every five years would be acceptable for businesses with a strong track record of compliance. By contrast, businesses in Northern Ireland who supported less frequent inspections based on compliance typically suggested every two years. This appeared to be linked to them generally favouring inspections happening more frequently for all businesses.

While most small and medium business supported reduced inspection frequency based on compliance, there were some who had concerns. These businesses argued that reducing inspection frequency based on compliance could lead to lower standards in some currently high performing businesses. They thought an extended time between inspections may make it less likely that businesses would do the work required to keep consistently high standards. Another concern was related to the principle of having different frequencies for very similar businesses. Some thought that this undermined the overall consistency of the FHRS, pointing out that lots can change in a business in the time between inspections.

"I think a lot can change in a year. I think myself, this business is a prime example of that, I've only been here a year and there's a million and one things that have changed in that time, we've got new owners in in that time. So, anything like that, and disruptions due to the kitchen, and you never know day to day in restaurant life, let alone year to year." (England, small business (10-24 employees), 5 FHRS rating)

"I don't think it does any harm, just to come in every so often. Yes, okay, everything's great, can proceed as normal, that's great. It's peace of mind for us as well."

(Northern Ireland, small business (<10employees), 5 FHRS rating)

Large businesses were more likely to support reduced inspection frequency for compliant businesses than small or medium businesses. They thought that this was an appropriate way to encourage consistently high standards, and to ensure inspections were focused on businesses where compliance was lower.

"I think if you can demonstrate as a business that you have the systems and the frameworks in place and that's borne out by the food hygiene ratings generally that you have as a business, then my view is if I was a local authority I'd want to utilise my resources perhaps elsewhere within my district that needs it more, rather than a large retailer whose brand and reputation is built on great standards."

(Large retail business)

The only exception among large businesses was a national takeaway chain that pointed out that they experience high staff and management turnover, and that many of their staff are very inexperienced. They valued the FHRS and the inspections as a way of providing an additional check, alongside their own internal controls and audits. They were concerned that changing the inspection frequency could undermine this, and that their large staff turnover could mean that a track record of compliance was not wholly representative.

"I think I would be concerned because although yes we're a big brand, we have some really good controls in place, each store differs because it differs by who manages that store. And we do have a high employment churn rate. So, you could find that since the last visit you've had two different store managers or you've moved a store manager from somewhere else."

(Large restaurant business)

### 3.3 Less frequent inspections for higher risk businesses with a good record of compliance

Businesses were also asked more specifically about reducing inspection frequency for businesses that were inherently higher risk, such as butchers, but that had a good track record of compliance. Most businesses generally had a similar view on reducing inspection for compliant high risk businesses as they did for reducing the frequency of inspections based on high compliance more generally.

However, there were a small number of businesses in all three nations that had concerns about reduced inspection frequency for compliant higher risk businesses, even though they supported reduced inspection frequency based on compliance in principle. These concerns focused on a perception that there were good reasons that these businesses were considered higher risk, and that this should be reflected in how often they are assessed as part of the FHRS scheme. The businesses with concerns questioned the reason for reduced frequency and did not feel it was consistent with the overall purpose of the scheme; to ensure compliance with food hygiene standards.

"With a high risk business I would still aim for the yearly length. You're high risk there. You've got an extra type of danger there and I think, no, you wouldn't want to extend that too far because the risk might be too much."

(Northern Ireland, small business (10-24 employees), 5 FHRS rating)

"It's still high risk though isn't it? I think even if they're consistently good, it could cause people to be a bit more lax if they know they're not getting checked as often I think. It keeps people's standard."

(England, small business (<10 employees), 5 FHRS rating)

A small number of businesses that supported reduced inspection frequency for high risk compliant businesses pointed out that higher risk businesses often faced inspections or audits from other organisations. They felt that if they were being assessed in other ways this would support less frequent inspections as part of the FHRS. Their argument was that any major food hygiene or safety issues were likely to be identified by any non- FHRS inspectors or auditors visiting the premises.

"I have an instinct that there are other regulatory bodies in those companies... I imagine that there is something other than the food hygiene programme for those very high risk areas. I know that there's quite a lot to do with meat passports, for example, and where meat comes from." (England, small business (10-24 employees), 4 FHRS rating)

### 3.4 Using the FHRS scheme to assess other businesses in Wales

Businesses operating in Wales were asked whether they ever used the FHRS scheme in their partnerships with other businesses, for example to check on manufacturers or suppliers. This reflects the different scope of the scheme in Wales. Only a few small and medium businesses in Wales had used FHRS for this purpose, with many saying they had never considered doing so.

"I suppose it [other businesses' FHRS rating] does, a little bit. If they got a really low score, I don't know if I'd want to buy stuff from them."

(Wales, small business (<10 employees), 3 FHRS rating)

Other businesses said that they used other criteria to choose suppliers, including local knowledge or recommendations and personal experience. In these cases, FHRS ratings had no influence on their decision-making.

Large businesses said they did not believe FHRS ratings were taken into consideration when choosing suppliers in Wales. However, they pointed out that this was a supply chain issue that was looked after by other parts of their business. This meant they could not be certain about any role played by FHRS. A large supermarket chain also said they have minimum requirements for FHRS ratings for businesses they use as food concessionaries in their own stores, but that they use other criteria and their own assessments for choosing suppliers.

# Value of FHRS Business Research: Chapter 4 How do businesses view the mandatory display of FHRS rating?

Businesses were asked to consider their views on mandatory display of FHRS ratings. In Wales and Northern Ireland, it is mandatory for businesses to display their rating in the establishment. In England, the display of FHRS ratings is voluntary, although businesses are encouraged to display them. The FSA publishes the ratings for all businesses in scope across the three countries on the FHRS website.

Overall, businesses across all three nations generally supported the mandatory display of FHRS ratings. This support was common across businesses of different sizes and types, and regardless of their current FHRS rating. However, a few businesses were concerned about either introducing, or continuing with, mandatory display.

"To me, what's the point of doing it [FHRS inspections] if that business doesn't take it seriously? If you don't have to display it, they haven't taken it seriously and they're hiding behind a failure."

(England, small business (10-24 employees), 5 FHRS rating)

In England, businesses generally supported mandatory display of FHRS ratings. Most businesses in England said they already display their rating, and it would not be an issue for them if doing so became mandatory. As with other nations, businesses in England argued that if they were under no obligation to display the rating this undermined the value of the scheme to consumers overall. Many businesses felt that mandatory display would be beneficial for businesses by encouraging compliance. They also thought there was value for consumers, as it would allow them to make informed decisions about where they wanted to visit based on knowing that all businesses had to

display their rating on the premises.

"It's a positive thing. I think it's a very positive thing. A lot of businesses, they'd love to put their 5 stars up there, wouldn't they?"

(England, small business (10-24 employees), 4 FHRS rating)

"The benefit would be mainly for the customers, because now they have a better chance to take a better option, for example some people may not want to go to an establishment below 3, or below 4, and when it's clearly displayed, they can make an informed decision." (England, small business (10-24 employees), 3 FHRS rating)

Indeed, some businesses in England did not know that the scheme was voluntary and had always assumed they had to display their ratings. They thought displaying a rating was the outcome of the FHRS process. A few suggested that inspectors had told them that that the ratings stickers had to be displayed.

"I thought it was compulsory. If I'm really honest I was just presuming that it was part and parcel [of] a food business."

(England, small business (<10 employees), 5 FHRS rating)

"You have it displayed because you have to have it displayed. That's the law. But I don't have an issue with it."

(England, small business (10-24 employees), 4 FHRS rating)

The main concern about mandatory display of FHRS ratings among businesses in England was that it was unfair if businesses were inspected on a 'bad day', and then had to display this rating for a long time. In particular, some businesses had concerns about the potential for a disproportionate impact on small businesses. For example, if an inspection coincided with a period when staff were off through illness, the assessment may not reflect the business' usual standards.

"If on the day you found that you had something broken and it caused you to have a worse rating, or if it's something that will be fixed, or you have a specific staff member that needed either more training or that you had a problem with and they let the side down, then I would say it's quite harsh to be stuck with displaying it because you can lose a lot of customers."

(England, small business (25-49 employees), 5 FHRS rating)

In England support for mandatory display was consistent across different FHRS ratings, including those with current FHRS ratings of 1 or 2. While these businesses with lower scores acknowledged that mandatory display might not suit their current circumstances, they felt the scheme needed ratings to be displayed to be effective.

"I don't mind. I mean, it's a sense of pride as well. I mean, it's a bit of showing off of the way that you work and the fact that you have everything as it should be. It would be a bit difficult, of course, if the rating is low." (England – small business (<10 employees), 1 FHRS rating)

One business in England said they had displayed their rating when they received a rating of 5, but when they dropped to a rating of 3 they removed the sticker. They did this because they had the choice to do so. Even so, they felt that the displaying of ratings should be mandatory to ensure that the scheme achieved its overall aims of ensuring compliance and giving consumers consistent information.

"If we got a 5, we would have displayed it. Because we only got a 3, we didn't display it." (England, small business (10-24 employees), 3 FHRS rating)

In Wales and Northern Ireland, there was support for continuing with mandatory display. Businesses felt that FHRS ratings were a source of pride for those who achieved high scores, and helped encourage a sense of responsibility to consumers, giving confidence they were eating in 'safe' premises. They also argued that mandatory display incentivised businesses to improve if they received a lower rating.

"Mandatory is fine, if you've got nothing to hide it's no problem, is it? And if somebody has been rated as a 0 or a 1, yes, they need to pull their socks up and get it sorted." (Wales, small business (<10 employees), 5 FHRS rating)

"I think it should. Say if it's bad, I definitely think it should. If you're not going to display it, what's the reason why you're not displaying it? Are you not displaying it because it's bad? So, then they're hiding that. So, what else are you hiding? If you're not doing things right, you've got a risk there."

(Northern Ireland, small business (10-24 employees), 5 FHRS rating)

However, a few small businesses in Wales did not support mandatory display. One operating near the English border said that they did not think it was fair that they had to display their ratings, while nearby businesses in England were not under the same obligation. Another business could see the argument for incentivising better safety and hygiene practices through mandatory display, but cited examples of businesses that had received poor ratings because of issues around paperwork or because they had been caught on a 'bad day'. They felt it was unfair that these businesses had to display their poor rating.

### "It shouldn't be a requirement to display it, why should Wales have to do it and not England?"

(Wales, medium business (50-249 employees), 3 FHRS rating)

"It's a tricky one. My big issue is it is used almost as a cross on the door. If you've got a 1, somebody has still got to put it up regardless."

(Wales, small business (10-24 employees), 5 FHRS rating)

Among large businesses, there was strong support for mandatory display. Large businesses felt that mandatory display was valuable for consumers as they could make more informed decisions on the types of businesses that they visited or ate at. Some large businesses, including a takeaway chain operating across all 3 nations, said they asked all stores to display their rating, including in England. A national food retailer assumed that it was mandatory, as all of their units are told to display their ratings.

"We tell them they all have to display it. If we have a standard, we apply it across all of our stores unless there is country legislation."

(Large restaurant business)

"We were putting them up before we were asked to do so, so yes, it's been a good driver for us."

(Large retail business)

"It's about time England caught up. It's been talked about, mooted, parked. It has been in Wales, Northern Ireland [for a while]."

(Large retail business)

The only concern about mandatory display mentioned by large businesses related to the overall consistency of the scheme. They argued that it was problematic if there were issues with the consistency of inspections, and if individual premises were assessed differently to others which they felt were carrying out the same practices and receiving higher scores.

"I don't really have a problem with mandatory display at all. I think it's fine. The only challenge... [is] if it was completely consistent across the board, then mandatory display is fine. But unfortunately, when you get a rating of 1 and you absolutely objectively know that it shouldn't be a 1, then it sticks somewhat, having to display that rating, I think." (Large retail business)

## Value of FHRS Business Research: Chapter 5 Do businesses view the current scheme as fair?

### 5.1 Overall views of the fairness of FHRS

Overall, businesses described the FHRS as fair. Those who thought FHRS was fair linked this to the standardised nature of the scheme. They suggested that the consistent approach made it straightforward to understand what was needed to achieve a high score. Through this standardised approach, these businesses thought that the FHRS served its main purposes of encouraging business compliance and giving consumers confidence.

"I think it's fair just in terms of everybody has got the same guidelines and at the end of the day if you follow them, you'll get that rating that you want, and if you don't then there's something to work towards."

(England, small business (<10 employees), 5 FHRS rating)

A small number of businesses took the opposite view: they felt that the standardised nature of the scheme meant it was unfair. Some small businesses suggested it was difficult to assess large businesses or other organisations with multiple premises using the same compliance standards as small businesses.

"With all these things, trying to equate a corporation, like a hospital kitchen with a small hotel kitchen. I think some of the comparisons are actually kind of, well, ridiculous is too strong a word, but they're very difficult to apply in the same way."

(England, small business (<10 employees), 5 FHRS rating)

A few businesses also found it hard to say whether they thought the scheme was fair or not, because they only had their own experience to base their views on. While they had not had any problems, they were unsure how others perceived the FHRS.

Although the scheme was viewed as fair overall across all three nations, there were some small businesses in both England and Wales that felt the FHRS was not fair. Views in Northern Ireland were more positive. Views on the overall fairness of the scheme were consistent across those with different FHRS ratings, with most businesses who had received an FHRS rating of 3 or lower saying they felt the scheme was fair. The main difference was among large businesses, where there were more mixed views about the fairness of the scheme, usually linked to views about consistency. This is discussed in detail below.

### 5.2 What shaped views of fairness

Perceptions of several key aspects of the FHRS seemed to shape views of the fairness of the scheme overall, particularly among those who thought the scheme was unfair. Firstly, businesses

discussed whether or not the scheme was applied consistently between different types of business and across different local authorities and nations. Secondly, businesses had different views about whether unannounced inspections offer a fair reflection of how a business operates. Finally, some businesses also discussed the role of paperwork in determining the outcome of the inspection.

### **Consistency across the FHRS**

Consistency was the main issue raised by businesses when discussing the fairness of the current FHRS. This was a particularly common concern raised by large businesses of different types that had multiple premises across different local authorities and nations (although a few smaller businesses also shared similar views). The ability of large businesses to consider how the FHRS operated across different nations and LAs, meant that they felt better placed to discuss consistency, based on evidence from their internal audits and processes around food hygiene. In some cases, their internal evidence suggested that a small number of premises were being assessed and rated differently as part of the FHRS than they would expect.

A few large businesses raised issues around consistency but argued that in any national scheme like the FHRS, it is inevitable that there would be a degree of inconsistency. They linked this to the scale of the scheme and the number of businesses and people involved. For large businesses who were more familiar with how the scheme is managed overall, the level of consistency was seen as generally good, and they did not feel there was a significant issue with fairness as a result.

"Yes, there is obviously a level of inconsistency, but generally I think because we do have some very standard systems and procedures that we have run past our primary authority, I do feel that it is a fair and just way of assessing stores."

(Large restaurant business)

However, for other large businesses, the issue of a lack of consistency was the main concern they had about the FHRS, and a reason some felt the scheme could be unfair. While they generally thought there was a good approach to the scheme overall, they pointed to some specific examples of inconsistencies between different local authorities, and between the approaches to awarding ratings in England, Wales and Northern Ireland. For example, one national supermarket explained that their ratings in Wales were lower than their equivalent stores in England, despite their own checks and compliance procedures showing that there should not be this degree of inconsistency.

"I think we have experienced much harsher ratings from the Welsh authorities than we have for what appear to be the same standards in England. I know we've had situations, for example, where whatever the circumstances we could never get above a 4 from one particular authority. This begs the question – really is this calibrated against the rest of England and Wales? Because there's clearly something not going right there and our standards are consistent on our side, and yet we're getting different scores."

(Large retail business)

A different supermarket cited a local authority they felt was giving lower scores than other areas. When they queried this they were told that the local authority in question did not tend to give ratings of 5.

"We were told that [local authority] just doesn't give 5s, which doesn't really provide much of an answer. So, we have had situations like that where you can see some maybe regional or authority differences."

(Large retail business)

Another supermarket chain was also concerned about consistency. They referenced their membership of supermarket safety groups and primary authority safety groups, and explained that when issues with ratings in certain local authorities are raised, similar experiences are shared across different businesses. They felt this showed some evidence of inconsistency in the overall scheme.

"We also are members of supermarket safety groups and primary authority safety groups, where we speak openly and in confidence. Some local authorities are sometimes called out as, 'Have you had any issues with low hygiene ratings from this authority?' Other businesses will say, 'By coincidence, we have,' and then you start to think, 'Well, maybe that local authority is the outlier?'."

(Large retail business)

"I mean when I've looked at it there's obviously occasionally inconsistency against different authorities and I get that, we all have a slightly different view. I've spent many an hour on the phone to different enforcement officers putting my view forward and then they don't agree with me. And I have those same healthy debates with our primary authority." (Large restaurant business)

A few large businesses suggested introducing a clearer process to ensure consistency. In particular, they were concerned that in the current process, there is no ability to have a timely second opinion from outside an individual local authority to ensure that ratings and re-ratings are fair.

"I think it's judge, jury, and executioner. You challenge back to the senior environmental health officer, the same office where the environmental health officer came from in the first place, so, that is not a fair and just system. They're effectively marking their own homework. Well, they should have done that prior to the letters being sent out. So, as I say, there is no way of challenging that. If we have to put that, for argument's sake, two rating on the door of our business, then that will financially impact us."

(Large restaurant business)

While small businesses were mostly positive about the consistency of the scheme, a few shared similar concerns to larger businesses and felt this undermined the fairness of the FHRS. This focused on the role of individual inspectors. Those who raised consistency as a concern, questioned whether all inspectors applied the assessments in the same way across different local authorities. All of those who raised this issue had at least an FHRS rating of 4 at their most recent visit.

"Like I said to you, and I keep saying to you, it depends on who you get, on who does what and how many times that person's been assessing."
(England, small business (10-24 employees), 4 FHRS rating)

"I suppose it's fair, but it depends on the individual inspector, doesn't it?" (Wales, small business (10-24 employees), 5 FHRS rating)

#### 5.3: Unannounced inspections

Those who supported unannounced inspections felt that they strengthened the fairness of the scheme, capturing an accurate picture of the food hygiene practices used by the business. They thought pre-arranged inspections would allow businesses to prepare and improve their practices in a way that may not reflect their normal day-to-day approach. This view was shared across businesses of different sizes and types in England, Wales and Northern Ireland.

"I do because usually you never know the person that is going to come, so there's a different person all the time, so they're not 'These ones know this one,' or this man doesn't like this shop."

(Northern Ireland, medium business (50-249 employees), 5 FHRS rating)

"If they were going to announce when they were coming, then that would be unfair because obviously everybody would be on the top of their game."

(England, small business (<10 employees), 5 FHRS rating)

"We never know when the control is coming, so that's quite fair that we don't know, because we're not going to prepare for it specially."

(England, small business (10-24 employees), 3 FHRS rating)

However, some small businesses argued that an unannounced inspection could not always be guaranteed to offer a fair reflection of how a business operates. They pointed to specific circumstances that could occur which they felt were beyond the control of the business. In particular, these businesses thought unannounced inspections could be unfair if key staff members such as managers were on leave, meaning that inexperienced staff members would have to deal with the inspection.

Others thought that businesses could simply be caught on a 'bad day', arguing that it was unfair for them to receive a poor rating for a long time as a result. One business suggested that assessments should happen over a longer time, or they should happen more frequently, to ensure an accurate assessment of compliance with food hygiene requirements.

"I'm going to say actually, 'No,' because it is based on one moment in time and I think that is not necessarily true for the whole time."

(Wales, small business (<10 employees), 3 FHRS rating)

### 5.4: The role of paperwork in awarding ratings

Another key concern among businesses that thought the scheme was unfair, was the role that paperwork played in determining FHRS ratings. The specific concerns about paperwork varied by business but mostly centred on the fact that it is difficult for some small businesses to manage the administrative requirements of the scheme. These small businesses thought large businesses were better resourced to ensure paperwork was fully completed.

Some felt that it was unfair that a business could achieve compliance that equates to an FHRS rating of 5 for hygiene and cleanliness, but then receive a lower rating because of paperwork issues. A few suggested that providing more details of the reason for a lower score would be helpful. This would mean consumers would be aware when paperwork issues resulted in lower score, rather than problems with food storage or handling. Many of the businesses who raised this issue had themselves received higher FHRS ratings.

"It's always been a bit of a sore point for me because I think quite a lot of people in the industry think that there is an overemphasis on the paperwork. There should be a cooling-off period if they get a visit where the paperwork isn't up to date, then they should be able to present evidence that the paperwork has been updated within a certain 2-week period or something."

(Wales, small business (10-24 employees), 5 FHRS rating)

"A big hotel has got various members of staff doing every bit of paperwork and every different thing, whereas here it's all one person doing everything. So, sometimes you think, 'Well, they've got a paid member of staff doing this, it's a bit unfair that I have to do the lot.'"

(Wales, small business (<10 employees), 5 FHRS rating)

"If it was split so that you knew that you get the 5 for your hygiene, the way you run, produce your food and then you get the separate score for your paperwork, that would be a fairer way of having the scores. It would make it clearer as to where the downfall is. It would be a lot clearer to the public."

(Wales, small business (10-24 employees), 2 FHRS rating)

# Value of FHRS Business Research: Chapter 6 What improvements do businesses suggest to the scheme?

### Overall views on whether improvements are needed

Businesses were asked to suggest improvements that they would like to see made to the current FHRS scheme. It is worth noting that most businesses described the current scheme as working well, and often struggled to suggest specific improvements. This was particularly the case for small businesses. Instead, any suggested improvements tended to focus on smaller amendments to make the scheme more effective in achieving its objectives.

"I think the scheme is run well, as I keep saying it sets a standard for your kitchen and your hygiene and your staff, and everybody has to follow the same standards. So no, I don't have an issue with it at all."

(Wales, small business (<10 employees), 5 FHRS rating)

"I don't think there's that much wrong with the scheme as it is." (Northern Ireland, small business (10-24 employees), 5 FHRS rating)

"Well, I would like this scheme to remain. I think it's really positive for businesses. Also it's good for the public to see they are walking into a nice, clean, hygienic shop. It's good both ways."

(England, small business (10-24 employees), 4 FHRS rating)

### Areas for improvement within the current FHRS

The suggested improvements to the FHRS tended to mirror the concerns that business had about the scheme. This included improving the consistency of the scheme, and ensuring that the inspections focused on compliance with food hygiene requirements, rather than having too much emphasis on paperwork. Some businesses also suggested improving the clarity of the scheme for consumers, while some other businesses suggested moving to a more collaborative approach to working between food businesses and regulators. These are discussed in more detail below.

### Consistency

While consistency had been more of a concern for large businesses, it was raised as an area for potential improvements across small and large businesses in all three nations. Businesses wanted the scheme to be consistent between nations and local authorities, linking this to ensuring it was seen as fair, and could be used with confidence by consumers. Some suggested introducing mandatory display in England to strengthen the consistency of the scheme.

### "Yes, I do think we need to have consistency across the devolved governments if possible."

(Large retail business)

### **Paperwork**

Some businesses suggested changing the weighting given to completed paperwork in the FHRS ratings given to businesses. As mentioned in Chapter 5, those who raised this felt it could be unfair for a food business complying with food hygiene requirements to be penalised disproportionately for falling behind with paperwork.

Businesses also suggested ideas for addressing concerns around paperwork. One business proposed giving businesses a short time to complete and submit up-to-date paperwork addressing any advisory changes or comments. This would then inform the final FHRS rating, rather than having to apply for a re-assessment on the basis of poor paperwork. They said that other auditors they work with, who consider other areas of the business, use this approach, and it has worked well for them.

"Give them some way of showing or providing evidence that they've rectified [paperwork issues] and reassess the score without a re-visit. Even if it's a 4, not a 5, that's something I'd do."

(Wales, small business (10-24 employees), 5 FHRS rating)

Other suggestions included digitising paperwork as far as possible. For example, one business suggested an online portal where chefs and other staff could input compliance checks and other information in real time. In their view, this would make it easier for the FSA to check how a business was operating, and for the business themselves to stay on track. Another business suggested having separate ratings for the outcome of the physical food hygiene inspection and the completeness of the associated paperwork.

"If there was a digital system for it, that the chefs could just input the information straight through, I would have thought that would be helpful for everybody." (Northern Ireland, small business (10-24 employees), 3 FHRS rating)

### Clarity about how the FHRS works

Another theme that emerged was that more could be done to provide further clarity on why businesses had been given a certain rating. This was seen as important in terms of explaining ratings to consumers, but also for businesses themselves. For example, businesses suggested that more information could be added to the display stickers to explain why a business had been awarded a certain rating, and what was involved to achieve that rating. This would allow customers to have a better understanding of how the scheme works, and then make more informed decisions when choosing where to buy food. Alongside this, businesses wanted to see more done to increase awareness and understanding of the FHRS scheme among the public, particularly around ratings and what they mean. One suggestion was that the FHRS scheme needed to be re-launched with the public to clarify how it works.

"I think it could be improved by more awareness of the scheme... and an improvement of the PR basically."

(England, small business (10-24 employees), 3 FHRS rating)

#### Working relationship between businesses and regulators

A final area of potential improvement raised by a few small and medium businesses focused on the nature of the relationship between businesses and regulators. They wanted those involved with running the scheme and determining ratings to be more approachable. They argued that businesses generally wanted to operate to the highest levels of compliance, but that doing so in practice can be particularly difficult for small businesses. As such, they wanted a more collaborative approach, with the FSA and local authorities working with businesses to improve food hygiene standards. For example, this might encourage businesses to ask for help with problems they are facing without concerns that they may be penalised as a result.

"I think people can get so stressed out by it that it's not helpful as they just end up hiding stuff. Whereas if it was more approachable and a less – not stern approach as I think you should be strict on that – but if it was more of a help-you scheme, something like that, then you might actually solve more problems."

(England, small business (25-49 employees), 5 FHRS rating)

"A lot of the things with the scheme are really good. Maybe another thing as well, but just to break down the barriers of it not being such a scary thing for business owners." (Northern Ireland, small business (10-24 employees), 5 FHRS rating)

"Everybody fears an inspection, because you don't want to have things wrong and lose marks. But sometimes, maybe giving advice and guidance can also be a good way of approaching it."

(England, small business (10-24 employees), 5 FHRS rating)

Linked to this, some businesses wanted the FSA and local authorities to do more to offer updated information to businesses. They said this would help businesses to be more aware of the current regulations and guidance.

## Value of FHRS Business Research: Chapter 7 Conclusions

Many businesses across all three nations were positive about the value of FHRS. An important aspect of the value that the FHRS offered, was giving businesses an independent assessment of how well their business was complying with food safety and hygiene standards. The importance of this aspect of the FHRS was emphasised across small, medium, and large businesses of different types across all three nations.

Many businesses also felt that FHRS ratings had value for their customer engagement, helping to attract and retain customers. However, some businesses thought that the FHRS made little difference to their customers. These businesses described consumers as not paying attention to FHRS ratings or pointed to limited choice in their location as a reason consumers would continue to use their business even if it had a low FHRS rating.

Other aspects of values from the FHRS were mentioned less often but were important to some businesses. These included the role of the FHRS in insurance cover, using FHRS ratings as a marketing tool on social media, and FHRS ratings allowing businesses to trade through online aggregators.

Business wanted to see FHRS assessments happen at least as frequently as they do currently. Businesses linked frequent inspections to the value they attribute to the scheme and particularly FHRS ratings. Different experiences of inspection frequency seemed to shape businesses' specific views about how often inspections should happen.

Businesses were generally supportive of reduced inspection frequency based on compliance. They felt compliant businesses had proven themselves, and generally assumed standards would

largely be maintained. However, a minority of businesses were sceptical about reduced inspection frequency, suggesting this could encourage businesses to drop their levels of compliance. Significant management or staff turnover were seen as reasons for having a new inspection, even among businesses who supported reduced inspection frequency based on compliance.

Views about reduced inspection frequency for compliant high risk businesses were largely similar to their general views on reduced inspection frequency based on compliance. However, a few businesses raised concerns about reduced inspection frequency for these businesses. They felt that changing the current approach to higher risk compliant businesses would undermine the role of the FHRS in protecting consumers.

Business of different sizes and types generally supported the mandatory display of FHRS ratings. In Wales and Northern Ireland, businesses supported continuing with mandatory display, and businesses in England wanted to see the introduction of mandatory display. Support for mandatory display was consistent across businesses with different FHRS ratings, including those that currently have low ratings.

Most businesses viewed the current FHRS as fair. Those who thought FHRS was fair linked this to the standardised nature of the scheme. They suggested that the consistent approach made it straightforward to understand what was needed to achieve a high score.

When discussing fairness, the most common issue raised by businesses was consistency. Large businesses described examples of inconsistency in ratings between nations and LAs that they felt did not reflect compliance in the premises. Some small and large businesses also highlighted concerns about inconsistency between individual inspectors.

Unannounced inspections were also discussed when considering the fairness of the FHRS. Overall, most businesses thought unannounced inspections were appropriate given the purpose of the FHRS, preventing businesses with generally poor compliance from preparing in advance. However, some businesses felt that unannounced inspections were unfair as the business could be visited on a 'bad day', resulting in a poor FHRS rating that did not reflect their usual practice.

Some businesses also raised paperwork as an aspect of the FHRS they thought was unfair. They were concerned that a business could have good levels of compliance with food hygiene standards, but then be penalised for poor paperwork. Some small businesses felt that the administrative burden made it difficult for small businesses to match the standards of larger businesses.

Overall, most businesses were content with the current FHRS system and found it hard to suggest improvements. Any suggestions for improvements linked to the concerns that businesses had raised previously: ensuring consistency, reducing the administrative burden, and improving consumer and business understanding of the FHRS. A few businesses also suggested a more collaborative relationship between regulators and businesses as a way to improve the effectiveness of the scheme.