

The value of the Food Hygiene Rating Scheme: Local authority research

Maes o ddi-ddordeb 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 Local Authority 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 LAs about the FHRS.

Methodology and sampling

The research with LAs involved a series of four online workshops – three with LA representatives from England, and one with representatives from Wales. Two in-depth interviews were conducted with LA representatives from Northern Ireland. The workshops lasted 2 hours and the in-depth interviews were 60 minutes.

Across the workshops and interviews, 50 participants took part in the research – 33 representatives from LAs in England, 15 representatives from LAs in Wales, and 2 representatives from LAs in Northern Ireland.

Discussions included LA representatives' views of the current FHRS and how it works in practice and their perceptions of the value of the FHRS. LAs were also asked about their views on inspection frequency, re-assessments at the request of food businesses, and the role of remote inspections. Finally, LAs discussed how the FHRS could be improved.

Key findings

The value of the FHRs

LA representatives from across all three nations were positive about the current FHRs. They said the scheme had helped encourage increased consistency for regulating food hygiene standards in food businesses across all three nations. While LA representatives from Wales were broadly content with the scheme, those from LAs in England felt the scheme could benefit from a review to ensure it kept up with changes in the new types of businesses since the FHRs was introduced.

LAs representatives across England and Wales agreed that consistency around how food hygiene standards are assessed was a crucial feature of the FHRs, and fundamental to the value of the scheme. LA representatives from Wales and Northern Ireland believed the FHRs has brought consistency to how food hygiene standards are regulated in food businesses. Although they agreed that consistency has improved through the FHRs, LA representatives from England highlighted differences in how the scheme is managed in different places, particularly in terms of how low risk businesses are regulated.

LA representatives across all three nations explained that another fundamental value of the scheme was providing consistent information about food hygiene standards to the public, supporting consumer confidence and choice. However, some LA representatives in England questioned how much consumers use FHRs ratings in practice.

LA representatives from England and Wales also pointed out the value of the scheme for environmental health teams within LAs. The high profile, public nature of the scheme meant that it had raised the profile of food hygiene standards, generating interest and engagement from elected members and local media. This was seen as having strengthened the role of environmental health teams.

Managing re-assessment at the request of businesses

LA representatives described challenges associated with re-assessments and revisits, although the extent of this varied. The challenges mentioned were:

- the role of online aggregators (like Deliveroo, Just Eat and Uber Eats) as a driver for re-assessments;
- businesses requesting a quicker re-assessment process due to there being a fee
- businesses who have a lower FHRs rating looking to avoid re-assessment charges by re-registering as a new business.
- some LA representatives in England also discussed whether lower risk retailers needed to be included in the scheme, particularly where only pre-packed ambient food was being sold. This view was not shared by all LA representatives in England, but those who discussed it were generally open to these types of businesses being exempt from the scheme.

What businesses do LAs value being in the FHRs?

Overall, LAs did not highlight specific types of business that they particularly valued being in the scheme. Instead, they emphasised the importance of a consistent approach to assessing food hygiene standards in food businesses like takeaways, restaurants, cafes, and institutions (for example, schools, hospitals and care homes).

Views on voluntary and mandatory display

In Wales, mandatory display was strongly supported and seen as fundamental to the effectiveness of the FHRs. LA representatives in Wales thought mandatory display highlighted the importance of their work and had helped raise food hygiene standards. They also felt that mandatory display brought benefits for consumers by increasing transparency.

LA representatives in Northern Ireland also strongly supported mandatory display. They explained that a voluntary scheme was not fair because businesses would not display their rating if it was not in their interest to do so.

In England, there was strong support for introducing mandatory display for FHRs ratings. LA representatives in England felt that voluntary display undermined the value of the FHRs by reducing the incentives for businesses to comply. They believed mandatory display would further encourage compliance with food hygiene standards. However, they voiced concern about the existing pressure on resourcing the work associated with the FHRs, and worried about some of the practicalities of enforcing mandatory display. For example, concerns were raised that this could lead to increased aggression towards inspectors or others responsible for ensuring low-rated businesses display the correct stickers.

Reducing inspection frequency for high risk businesses based on compliance

LA representatives in Wales were strongly opposed to any changes to inspection frequency based on compliance. They felt the inspection frequencies were broadly appropriate, including for compliant high risk businesses. However, some discussed the possibility of a more focused or adapted inspection regime for compliant businesses, involving a less thorough inspection, at the same regularity as current inspections; they referred to this as a 'verification'.

In England, views on inspection frequency for high risk businesses were more mixed. In part, this was because LA representatives in England described facing resource constraints and a COVID-19 backlog; many LAs were already reducing the frequency of inspection based on compliance levels and prioritising businesses deemed as higher risk. Those who had concerns about reduced inspection frequency described previous experiences of standards falling significantly when businesses were not inspected for several years. The impact of staff and management changes on compliance levels was also a concern, with LAs emphasising the need for regular inspections.

LA representatives from Northern Ireland had reservations about reducing inspection frequency based on compliance for higher risk businesses. However, both LA representatives from Northern Ireland suggested that they felt that the track record of compliance already plays a role in how they prioritise their inspections, including how confident they are in a business' management.

Aspects of the scheme that could be improved

LA representatives from Wales were unanimous in their support for the existing scheme, which they considered effective and consistent across Wales. They had few suggestions for areas of improvement.

LA representatives from England were more likely than those in Wales to suggest improvements to the current scheme. Their priorities included addressing issues such as introducing mandatory display and reviewing the types of low risk businesses included in the scheme. Changing the range of awarded ratings was also an area of improvement highlighted by several LA representatives from England. They felt that the current 0-5 ratings were potentially confusing for consumers and were not well understood. Different options were discussed but no consensus

was reached.

LA representatives from England and Northern Ireland suggested changing the confidence in management part of the rating. A number of LA representatives from both nations suggested that the lack of flexibility around rating confidence in management meant that they could not always give a fair assessment of the business.

LA representatives from Northern Ireland felt that there was room for some changes and improvements within the current system. They felt the 0 to 5 ratings generally worked well, but that the 3 rating was perhaps too broad and could be changed.

Value of FHRs Local Authority 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 [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 LAs about the FHRS.

The overarching research objective for the LA strand was to assess the perceived value of the FHRS for LAs. The key research questions for strand of the research were:

- What aspects of the FHRS do LAs find valuable?
- Is the burden of re-assessment at the request of the business an issue? Do LAs feel that certain businesses reapply for re-assessment more than others?
- What are the perceived benefits and drawbacks of voluntary and mandatory display of FHRS ratings according to LAs?
- How would LAs feel about reduced inspection for inherently high risk Food Business Operators (FBOs) who have a consistently good track record of compliance?
- Are there any aspects of the FHRS scheme that could be improved?

This report sets out the main findings from the LA strand of the research. Alongside the evidence from the business 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, four online workshops were conducted to explore LA representatives' views on the FHRS. Three of these online workshops involved representatives from England. One of the online workshops involved only representatives from Wales. In-depth interviews were also conducted with two LA representatives from Northern Ireland.

Overall, thirty-three LA representatives from England took part, and fifteen representatives from Wales. Two LA representatives from Northern Ireland took part through in-depth interviews. Each workshop was divided into smaller groups to enable all participants to contribute. In England, nine

Environmental Health Officers, six Senior Environmental Health Officers, and one Principal Environmental Health Officer took part in the workshops. The remaining participants from England included a range of job roles, including Food Safety Officer, and other specialist and public protection officers. A range of roles were represented in Wales. This included Principal Environmental Health Officers, Senior Environmental Health Officers and Environmental Health Officers. The two LA representatives from Northern Ireland included one Principal Environmental Health Officer and one Environmental Health Officer.

Table 1 – Summary of LA representative workshop participants

Location	Workshop date	Number of participants
England	Thursday 3 March 2022	9
England	Monday 7 March 2022	7
England	Tuesday 8 March 2022	17
Wales	Tuesday 15 March 2022	15

Two LA representatives from Northern Ireland were also included in the research, through individual in depth interviews, which were conducted in March 2022.

Value of FHRs Local Authority research: Chapter 2 The value of the FHRs

2.1 General views of the FHRs

Overall, LA representatives from across England, Wales and Northern Ireland were positive about the current FHRs. There was a broad consensus that the FHRs has helped encourage increased consistency for regulating food hygiene standards in food business establishments across all three nations.

In Wales, there was a strong and consistent view among LA representatives that the FHRs has improved business compliance with food hygiene standards and is delivering real value to the public as a result. LA representatives from Wales were also content with how the scheme works in practice and had few suggestions for specific changes or improvements.

Among LA representatives from England there was more debate about how well the scheme is currently working. This included LA representatives from England identifying more aspects of the scheme that they would like to see changed or reviewed than in Wales or Northern Ireland – despite their agreement on its overall benefits.

“And I would say I'm a fan of it. I think it's needed. It makes it more transparent to the public for the businesses. But I do feel now it needs a really good review, a really good shake-up.”

(LA representative from England)

In England, LA representatives said that the scheme needs to be reviewed to keep up with changes in the new types of businesses since the FHRS was introduced. They discussed various examples, including the increasing importance of online platforms and home-based businesses selling food to consumers.

LA representatives in England also consistently referred to significant challenges around resources, including the impact of a backlog of inspections because of the COVID-19 pandemic. These were seen as preventing them from running the FHRS in a way that reflected the FSA's requirements. For some LA representatives in England, increasing numbers of re-assessments and visits to new low risk businesses (those which fall under categories D and E of the Food Law Code of Practice) have exacerbated these existing challenges.

While there were some challenges around the COVID-19 backlog in Wales, resourcing pressures were not seen as an issue more generally. They felt able to run the scheme in line with their agreed approaches and were also confident the FHRS was managed consistently across Wales. Northern Ireland was in a similar situation, with no significant backlog and a broadly consistent approach across LAs.

2.2 The importance of consistency

LAs across England and Wales agreed that consistency around how food hygiene standards are assessed was a crucial feature of the FHRS, and fundamental to the value of the scheme. LA representatives were positive about the centralised approach to the scheme in principle. They felt that the FHRS had greatly improved consistency between different LAs and across regions and nations, as well as when assessing different types of businesses. This was particularly the case when comparing consistency and standards of inspection prior to the creation of the FHRS.

“The one thing I think it's good for is consistency and transparency as an officer when you're inspecting.”

(LA representative from England)

“There wasn't consistency for the public in the ratings and where they could find the information and things. So, from that I think it's only been a good thing, I would say.”

(LA representative from England)

Despite this overall consistency, LA representatives in England discussed differences in how the scheme is managed in different places, particularly in terms of how low risk businesses are regulated. The scope of the scheme was therefore not seen as consistent in practice across England, with LAs prioritising their limited resources in different ways.

“I'm thinking in terms of low risk premises like high street retailers, who get given ratings, and some don't register them, some exempt them, there's a complete mismatch of which ones get a food hygiene rating, which ones don't.”

(LA representative from England)

Given the importance they placed on consistency, LA representatives in England were positive about the FSA's recent consistency exercises. They felt that despite some of these minor variations in the scope of the scheme, the way businesses are assessed and rated was thought to be very consistent. Continuing to ensure consistency was an important priority in England, and some of their suggested improvements related to clarifying the scope of the scheme or having guidance about what to do in specific scenarios in order to improve consistency.

In Wales, LAs were unanimous that the FHRS has brought consistency to how food hygiene standards are regulated in food businesses. They highlighted the work of the All Wales Food Hygiene Rating Scheme Steering group, that organises regular initiatives to ensure that LAs are aware of current regulations and to ensure that food hygiene standards are consistent across the country.

“We do a lot of consistency exercises, and we actually have a subgroup that agree what scenarios are going to be presented that year of what areas we are wanting to tease out for getting the consistent message across, as to how that need is to be rated. That's worked really well.”

(LA representative from Wales)

LA representatives from Wales also discussed the importance of co-operation across Wales during the early stages of implementing the scheme. They described this work as crucial in enabling them to achieve consistent standards. They also wanted to ensure that their work to build the scheme in Wales over more than a decade would not be undermined by changes to the FHRS.

“Again, a lot of that, I think, was nailed quite early doors when the legislation came in. We all set out our stalls as to how we were going to enforce the regulations, particularly around things like businesses not displaying their ratings, what action we took in the early days, and then, as the regulation bedded in, how we do enforcement going forward. I think we're all pretty consistent with how we deal with them.” (LA representative from Wales)

LA representatives from Northern Ireland felt that the scheme was applied consistently across their nation. One representative highlighted the small number of LAs, and said this made it easier to manage consistency than in England in particular. They also mentioned that they conduct monthly meetings to discuss the scheme, and within those meetings they stress the importance of consistency.

2.3 The value of the FHRS

As well as their overall feedback and the emphasis on the importance of consistency, LAs also identified key areas of value they thought that the FHRS brought for consumers, businesses and LAs. These are summarised below.

LA representatives suggested that the fundamental value in the scheme was in providing consistent information about food hygiene standards to the public, supporting consumer confidence and choice. They felt that the FHRS meant consumers could trust that the businesses they bought food from were safe. LA representatives from Wales in particular emphasised that the scheme has been valuable for – and is valued by – consumers.

“The scheme has been a total success, basically, in driving up standards, as far as we're concerned, and provides the consumers with a degree of confidence of the food and stuff they're going to buy, due to the fact that we are an independent inspection regime in the area.” (LA representative from Wales)

LA representatives from England generally shared this positive view of the scheme overall, and felt it has been a valuable tool for consumers. However, there was more debate among LA representatives in England about whether consumers really care about and understand the scheme.

“I find there's quite a lot of confusion out there because consumers sometimes think that the scheme is for how nice the food is, so the food quality rather than the hygiene. So, they'll phone up and they'll say, 'I had a sandwich from there and it was just really horrible.”

It was cheap and nasty,' and we have to explain that it's not about that. So, there's a little bit of confusion about the scheme."

(LA representative from England)

LA representatives from Northern Ireland shared similar sentiments that the FHRS is useful for consumers. They felt that consumers were confident in contacting them, when they saw signs of non-compliance.

"Oh, definitely it does [make a difference to consumers]. Something that I found recently with COVID, consumers have definitely become more clued into everything and aren't afraid anymore to complain. So, if they see non-compliance, they will phone in and it definitely does make a difference."

(LA representative from Northern Ireland)

There was also a shared view among LA representatives that the FHRS ratings stickers were a valuable aspect of the scheme for consumers. LA representatives felt that while not everyone looks up ratings on the website, the stickers displayed in premises were used by consumers to inform their decision-making. Participants felt this was a good way of highlighting their work to improve business compliance.

"Yes, I don't know how many people actually look it up before they go out. I think people rely on the window stickers." (LA representative from England)

In addition to the value for consumers, LA representatives from both England and Wales agreed that the FHRS is valuable for businesses and has raised food hygiene standards. They felt this had been achieved by bringing clarity to businesses, offering them a more consistent understanding of good hygiene practices. They felt that many businesses used their ratings as a way to stand out from their competitors, and thought this sense of competition had driven up standards.

Other LA representatives discussed that they felt FHRS ratings are seen as valuable by many businesses as they can be used as a marketing tool to engage with consumers. They also highlighted that the scheme is often referenced by the media to highlight businesses that have poor standards in their local area. Some also stated that they felt businesses believed the overall rating was simple to understand, which they valued.

"One of the benefits has been the overall compliance levels have improved across the board, the food business operators, themselves, have engaged with this system. And not only do they benchmark themselves against their counterparts, but they also maintain their standards, and it's only a small percentage which relapse and don't maintain their standard." (LA representative from Wales)

However, some LA representatives in England believed that the scheme is seen as more valuable by those businesses who are seeking to achieve the highest standards. In their experience, some businesses were content with lower ratings and only interested in achieving minimal levels of compliance.

"So, the ones maybe that you give a 4 rating to and they're really disappointed and are desperate to get their 5, and they'll do everything possible to get that and, in our case, normally pay for a re-score. The ones that are coasting at a 3, they're just happy with that and it doesn't make a huge difference to them." (LA representative from England)

LA representatives from England and Wales also pointed out the value of the scheme for environmental health teams within LAs. The high profile, public nature of the scheme meant that it had raised the profile of food hygiene standards, generating interest and engagement from elected members and local media. This was seen as having strengthened the role of

environmental health teams. A few said this had enabled them to argue for additional resources, even during a time of financial challenges for LAs.

“From a political point of view, it's always something that I guess our members, councillors are quite keen because it's very public facing.” (LA representative from England)

Value of FHRs Local Authority research: Chapter 3 Managing re-assessment at the request of businesses

LA representatives discussed their experiences of re-assessment, including how this is managed and what it means for the FHRs. In general, LA representatives thought there were some challenges associated with re-assessments and revisits, although the extent of this varied. One of the challenges that they highlighted was the role of online aggregators (like Deliveroo, Just Eat and Uber Eats) as a driver for re-assessments. LA representatives also explained that the introduction of fees for re-assessments has led to an increased demand for quicker re-assessment visits from businesses, because they were now paying for this to happen. In addition, LA representatives discussed how some businesses avoid charges and being given low ratings by re-registering as a new business.

LA representatives from Northern Ireland felt that the re-assessment scheme worked well and was not a huge burden to their current workload. One explained they receive about 20-25 requests for re-assessment a year. From their experiences they felt that most businesses only requested re-assessments if they really wanted to get an improved rating for the right reasons, and the changes that needed to be done had been completed.

In England, LAs charged a range of fees (from c.£100 to £250), with some who said they charged a flat rate while others considered factors such as the distance and time it takes for an inspector to conduct a revisit. In Wales all LAs charged a fee of £180, which was set and agreed by all LAs in Wales. In Northern Ireland, both LAs charged a fee of £150 – this is the standard fee set in legislation for Northern Ireland.

Some LAs – particularly in England – discussed how some businesses were looking for re-assessments to be completed at a quicker pace than in the past. This was exacerbated by the role of the online aggregators which is discussed further below. LAs described dealing with increased pressure from businesses to speed up re-assessments or to see ratings improved when little had changed in the business. This was seen as a negative consequence of introducing charges for re-assessments.

In many urban areas, re-assessments were a significant aspect of LAs' workload in both England and Wales. In rural areas re-assessments seemed to be more unusual, linked to the limited reach of the online aggregators (as discussed further below).

Some LAs felt that takeaways formed a significant proportion of businesses who were seeking re-assessment. However, there was no overall consensus among LA representatives about the types of businesses that request re-assessments most often. This is likely to be linked to the profile of businesses in different places. LA representatives mentioned a range of businesses, from takeaways to residential care homes and supermarkets as examples of recent re-assessments. Some representatives felt the desire to beat or match their competitors was a key factor for requesting a reinspection, but that this cut across business types.

Many LAs described most of their re-assessments as coming from those with low FHRS ratings of 2 or under, but there was again no consistent pattern. Other LAs said that a significant number of re-assessment requests came from businesses who had achieved ratings of 3 or 4 but who wanted to achieve a 5. There were some concerns that this creates an unnecessary burden, especially as a 3 and above constitutes a satisfactory or better rating under the current scheme.

“It’s hard to say and I’ve not got the data in front of me, but the majority will be the 0, 1s and 2s. But equally, we do get a fair chunk of re-rating requests from those with a 3 or a 4.” (LA representative from Wales)

“It’s the ones that are pretty good but just want to aim for that five that I find the majority of the ones we get. The ones that get the poor, they’re just not bothered, the ones that get the poor rating.”
(LA representative from England)

Online aggregators, such as Deliveroo, Just Eat and Uber Eats, were thought to play a significant and increasing role in driving re-assessment requests. LA representatives from England described higher scores becoming much more important for some business who had been less concerned previously. It was now essential for their business model that they met the minimum standard required by these platforms. In turn, this meant that more food businesses offering takeaways and delivery were applying for re-assessments. These businesses also wanted the re-assessment process to be completed quickly because they were losing revenue by not being listed on the aggregator platform.

LAs worried that the re-assessments linked to the online aggregators were often motivated only by wanting to get back on the platforms, rather than being motivated by a genuine concern about improving food hygiene. As such, LA representatives expected that after achieving the minimum standard, these businesses were unlikely to maintain it.

“What is interesting is how some of the online platforms like Just Eat are now driving the ratings, rather than the environmental health team driving the ratings. Most of our service pressures come from the request for re-visits from take-aways, and things like that.”
(LA representative from England)

“We seem to be at the mercy of online food ordering platforms, such as Just Eat and Uber Eats because if a business scores poorly, they get knocked off their systems, which means they’re jumping up and down then for a revisit, which obviously puts a lot a lot more pressure on the local authority.”
(LA representative from England)

LA representatives in Wales also noted the impact of online aggregators, with one participant suggesting that this has increased the value of FHRS for some businesses. Overall, LA representatives in Wales did not consider the burden of re-assessment to be as much of an issue as it was for many LAs in England. This reflects LA representatives in Wales’ general views that the current system works well and that they have sufficient resources in place to manage it effectively.

“With going on Just Eat platforms and that sort of thing, I think they really value [the rating].” (LA representative from Wales)

The impact of re-registration of businesses was an issue highlighted by LA representatives from all three nations. LAs described an increasingly common practice where businesses would receive a poor rating but would then re-register the business under a new name, triggering an inspection without the business having to pay the re-inspection fee. It also means that businesses can operate under an ‘awaiting inspection’ status, despite having recently achieved a poor rating. LA representatives felt that this undermines the FHRS and contributes towards their current

workloads.

“Essentially, it's a way round. It's a very cheap way of having a re-inspection. To re-register a limited company, you're talking £14.99 on Companies House, whereas a reinspection is £180. The amount of new business churn you get as a result of that is difficult, and it tends to be the poorly performing businesses that tend to churn.” (LA representative from Wales)

“That's one of our main battles, they're constantly changing. If they do get a poor rating, they'll just change the company name, then you're chasing your tail with finding out who's actually the guiding mind of the business. That's what we are dealing with on a daily basis, working out who is responsible for the business, which makes it really difficult.”
(LA representative from England)

“So they don't have to pay for a revisit. There has to be some way to get around that. That'd be the only downfall.”
(LA representative from Northern Ireland)

LA representatives from England and Wales argued that introducing a form of licensing scheme for those selling food – similar to those within cosmetics and alcohol businesses – could be a way to address this issue. They felt this would reinforce the value of their inspections and strengthen the current FHRS.

“I think that's where the FSA need to help local authorities, is to have some sort of a like credit check of individuals, certainly for those with late-night refreshment licenses.”
(LA representative from England)

“If there was a licensing scheme, then you're ironing out all the problems before they start to operate, as in giving them guidance, preventing any poor practices before they start to operate.”
(LA representative from England)

Value of FHRS Local Authority research: Chapter 4 What businesses do local authorities value being in the FHRS?

The scope of the FHRS in England and Northern Ireland extends to establishments supplying food direct to consumers, including restaurants, cafes, takeaways, sandwich shops and other places where people eat food prepared outside of the home, as well as food retailers; in Wales some manufacturing businesses are also included in the scope of the scheme.

Overall, LAs did not highlight specific types of business that they particularly valued being in the scheme. Instead, they emphasised the importance of a consistent approach to assessing food hygiene standards in food businesses like takeaways, restaurants, cafes, and institutions (for example, schools, hospitals and care homes). They did not distinguish between these in terms of the value that the FHRS brings, arguing that protecting and informing consumers about food hygiene across all business types was the main value of the scheme.

In Wales in particular, LAs were generally content with the scope of the scheme and did not want this to change. They felt that it was good that the FHRS covered almost all food businesses in a consistent way, and they considered this a real strength.

“I would say that we're there to look at public safety and public health and there's a uniform level of standard, we're compliant with the law and making things safe... So, I think on the food hygiene grounds alone and public safety, that's the merit in keeping it as it is.”

(LA representative from Wales)

In England and Northern Ireland, LA representatives were more likely to highlight lower risk business types that they felt should not need to be part of the scheme as it currently operates. For these LA representatives, removing some of the lower risk businesses would enable them to prioritise higher risk businesses.

One example LA representatives from England often discussed, was people who have started their own baking business from home during the pandemic. Conducting inspections with these new businesses has been a significant burden on LAs. Some LAs also thought that the requirements of the FHRs were not appropriate for the way home bakers operate or for the low level of risk to consumers. For example, because visits are at the business owner's home, they have to be booked in advance, limiting the value of the inspection because it is not unannounced.

“There are a lot of them – very low risk – and baking cakes once in a blue moon when they get an order, but they still need inspecting. At present, they're new registrations, a lot of them, because they registered during COVID, and they've got to be done by the end of March on the Recovery Plan. Is a cake baker at home a priority? Not my priority but it is the FSA's priority.”

(LA representative from England)

“We're finding that we've got so many sweet makers, sweet cone makers, cake bakers, and it's just actually the resource for us to actually be able to go and do those ones.”

(LA representative from England)

Some LA representatives in England also discussed whether lower risk retailers needed to be included in the scheme, particularly where only pre-packed ambient food was being sold. This includes retailers who sell seasonal food gifts. This view was not shared by all LA representatives in England, but those who discussed it broadly seemed open to these types of businesses being exempt from the scheme. The examples highlighted by the LA representatives from England who took this view included corner shops, off licenses and other low risk businesses. These businesses mostly or only sold a small range of pre-packed foods, and no or very limited foods that needed to be refrigerated. LA representatives from Wales felt all premises should continue to be included in the scope of the FHRs.

“Your standard off license that has tinned goods, and might have a block of cheese, and a few sandwiches in a fridge, all pre-packaged, made somewhere else. The only requirement is the storage temperature.”

(LA representative from England)

“Personally, I think ambient temperature, just wrapped foods should be outside of the scheme.”

(LA representative from England)

LA representatives from Northern Ireland shared similar views to those in England about which businesses should be in the scope of FHRs. They described how home-based businesses had added to their workload, especially as some had registered during the lockdowns but may not be operating anymore. They also described how some venues, such as wet pubs, social clubs and retailers who sell a limited amount of food, which has not been prepared onsite, could be removed from the scheme. This is because they are likely to get a rating of 5 due to a lack of requirements at these premises, and it can take up valuable time in their workloads.

“If they say they're selling sandwiches, they do, and then it has to have the same, we have to go and do the inspection and that's an onerous thing, to go to a retail pharmacist, it's a bit silly just because they sell sandwiches in a refrigerated display. They're going to get a 5 unless the fridge is not working when you go in.”

(LA representative from Northern Ireland)

Value of FHRs Local Authority research: Chapter 5 Views on voluntary and mandatory display

Businesses in Wales and Northern Ireland are legally required to display their FHRs ratings in a prominent place. Fixed penalty notices are used for enforcement, if businesses do not comply with this. In England, there is no legal requirement to display an FHRs rating, although businesses are encouraged to do so.

In Wales, mandatory display was strongly supported and seen as fundamental to the effectiveness of the FHRs. LA representatives in Wales thought mandatory display highlighted the importance of their work and had helped raise food hygiene standards. They also felt that mandatory display was a benefit for consumers, as it increased transparency. They also referenced the usefulness of fixed penalty notices as a way to sanction those who do not meet the mandatory display requirements.

“It's transparency as well, basically there's no hiding place for a food business... it's giving the members of the public that categorical explanation of this is the result of the last food hygiene inspection. It's up to you then, it's taking an element of the guesswork away from the members of the public and giving that informed decision.” (LA representative from Wales)

“I don't see any drawbacks in it being mandatory at all. I think all the strength of it is in it being a mandatory scheme. We all operated a voluntary scheme... but really, unless you've got the teeth of mandatory and a legal requirement to display, then it's always only going to be partly successful.”

(LA representative from Wales)

The two Northern Ireland LA representatives also strongly supported mandatory display. They explained that a voluntary scheme was not fair because businesses would not display their rating if it was not in their interest to do so. For the FHRs to be effective, they felt it therefore had to be mandatory. One of the LA representatives from Northern Ireland suggested that since the introduction of mandatory display (October 2016), they have not encountered a lot of opposition, and that businesses will contact them if the business has lost its sticker.

“It has to be mandatory to be any good. We did the voluntary thing and that was good, it was a good precursor to the mandatory thing. Because it's not fair if somebody else displays it and not all the premises. It would only work if everybody's doing it right.”

(LA representative from Northern Ireland)

“There was no real opposition to it. There's been no real kickback from it. Everybody's quite compliant. People would ring and ask for replacement stickers and I suppose like the lower bit of the premises, you might have the odd premises where they don't want to put it up but then, you just send a letter. They know that they'll be fined and then they'll put it up.”

(LA representative from Northern Ireland)

In England, there was strong support for introducing mandatory display for FHRs ratings. LA representatives felt that voluntary display undermined the value of the FHRs by reducing the incentives for businesses to comply. If a business gets a low rating, they can opt to not display their sticker, and LAs assumed that most consumers were not checking ratings online.

“I think the non-mandatory display doesn't help. What's the incentive if you've not got to put your sticker in the window if you get a rubbish score?”

(LA representative from England)

“They're only interested in displaying the 5 stickers if they get them. Anything else, nobody bothers with.”

(LA representative from England)

LA representatives in England felt that mandatory display would further encourage compliance with food hygiene standards. They argued that this would make the scheme more effective for consumers, as it would inform their decision-making processes when choosing what businesses to interact with.

“I do think there'll be benefits, many more benefits. And I can't believe how long that has been going on. I mean, they've proved it with statistics in Wales and that it does make a bigger impact. The public still don't know to go on a website to look at the rating.” (LA representative from England)

Reflecting on the possibility of future changes to the voluntary display of FHRs ratings in England, LA representatives from England expressed concerns about the potential impact this might have, particularly in relation to resourcing. They discussed current resourcing pressures and emphasised how this could make mandatory display harder to deliver. This was both in terms of increased demand for re-assessments, and the need to enforce display. Some felt that while mandatory display would help with the long-term effectiveness of the FHRs, it may be difficult to introduce in the short-term.

“If you think about where we're at now [mandatory display] would require more resource because there's going to be an increased need for revisits. Just an increased resource to ensure that it's done properly and consistently.”

(LA representative from England)

“I sound like I'm being really negative and I'm not because I am for it, but I don't think it's the right time. I just don't think at the moment we could possibly put that in within the next year, I think it'd have to be after that.”

(LA representative from England)

Some LA representatives from England were concerned more generally about how mandatory display would be enforced. They had doubts about having the resources to enable staff to check that previously inspected businesses were displaying correct ratings. There were also some concerns about mandatory display leading to increased aggression toward inspectors or others responsible for ensuring that a low-rated business was displaying the correct sticker. These LA representatives wanted to know more about the practicalities of ensuring mandatory display could be administered safely, based on the experiences of LAs in Wales and Northern Ireland.

Value of FHRs Local Authority research: Chapter 6 Reducing inspection frequency for

high risk businesses based on compliance

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 LAs about the FHRS. LA representatives were asked for their views on inspections happening less frequently for businesses that have had a sustained level of good compliance over a number of years.

Overall, LA representatives from Wales were strongly opposed to any changes to inspection frequency based on compliance. They felt the inspection frequencies were broadly appropriate, including for compliant high risk businesses.

“It's now three years since some businesses had their last inspection due to COVID, and the fact standards have gone down tells us that the frequencies were just about right previously, in my mind.”

(LA representative from Wales)

However, a few Welsh LA representatives raised the possibility of a more focused or adapted inspection for compliant businesses, which they called a ‘verification’. This adapted inspection would be less thorough but would happen at the same frequency as the current full inspections. This could focus on things that were more relevant to compliant businesses.

“Perhaps it's not about the frequency itself because they're well embedded and they seem to work well. Perhaps...if you've been food hygiene scored at a 5, the type of intervention that you get the next time might be a slightly different one, so it might be a ‘verification’. It would be done at the same frequency but it'll just concentrate on the different aspects of what they're undertaking so it's more worthwhile. Particularly if that's applied to the ones which have already got perhaps a history of good compliance. Then that would be not changing the frequency but actually changing what local authorities and officers do.”

(LA representative from Wales)

In England, views on inspection frequency for high risk businesses were more mixed. In part, this was because LA representatives from England described facing resource constraints and a COVID-19 backlog. In practice, many LAs were already reducing inspection frequency based on compliance. This has meant that some LAs have opted to prioritise businesses that are higher risk, have a lower rating, or both.

While there was some support for reduced frequency based on compliance among LA representatives from England, there were also significant concerns. Those LA representatives who were not supportive, argued that while this might be a good idea in principle, through past experiences, they have found that standards can slip significantly if businesses have not had an inspection for several years.

“We can put an element of trust in them, but this break [COVID] has made that difficult because, yes, there's a lot of what were broadly-compliant businesses that have significantly reduced in standard.”

(LA representative from England)

Others referenced the impact that staff or management changes can have on business compliance with food hygiene standards, emphasising the need for regular inspections. In

addition, LA representatives pointed out that COVID-19 had introduced a forced break in their scheduled visits to some businesses, and since returning to inspections they have often seen a significant drop in standards from businesses that were previously highly rated. For this reason, some argued for more frequent visits.

“With the ones which score, consistently, top score, 5, who probably have their own auditors coming in. And you're consistently going and it's always really good. I think they could be reduced, the frequency we inspect those. Sometimes you just go in and it's spotless. But then, it still can change management and then sometimes it goes downhill.”
(LA representative from England)

“I think if you've got the same people running a business and it is consistently good, then yes. We can put an element of trust in them, but this break has made that difficult because, yes, there's a lot of what were broadly-compliant businesses that have significantly reduced in standard.”
(LA representative from England)

The LA representatives from Northern Ireland had reservations about reducing inspection frequency based on compliance for higher risk businesses. However, both LA representatives from Northern Ireland suggested that they felt that the track record of compliance already plays a role in how they prioritise their inspections, including how confident they have in management. One also said that if less frequent inspections were introduced, they would like to see some alternative form of intervention to check in on these businesses, such as self-assessment questionnaires.

Value of FHRs Local Authority research: Chapter 7 Aspects of the scheme that could be improved

LA representatives from Wales were unanimous in their support for the existing scheme, which they considered effective and consistent across Wales. They felt there were very few, if any, things that needed to be improved. Participants in one group suggested requiring ratings to be more visible for online businesses, and ensuring that the scheme keeps up to date with any developments on online platforms. Another suggested making the date of inspection details more visible on the FHRs ratings stickers. However, overall they felt the scheme was very effective in its current form.

“No, I think we've been quite clear on what we said. The scheme works well, it's a collaborative approach. As we said, the main thing is the businesses. We're here to really help businesses and it's getting them to understand the differences.” (LA representative from Wales)

LA representatives from England suggested more potential improvements to the current scheme than LA representatives from Wales. LA representatives from England prioritised addressing issues discussed previously, such as introducing mandatory display, and reviewing the types of low risk businesses included in the scheme.

Another area for improvement which was discussed by several LA representatives in England in more than one workshop, was changing the range of ratings awarded. These LA representatives felt that the current 0-5 ratings were potentially confusing for consumers and not well understood. Different options were discussed but there was no consensus. Some LA representatives

proposed a simple pass/fail rating, while other suggested three ratings to incentivise higher standards (fail, pass, excellent).

“We've just got too many categories, that's my thinking. I just think 0 to 5 is too many.”
(LA representative from England)

LA representatives from Northern Ireland felt that there was room for some changes and improvements within the current system. On the current rating system they felt that on the whole the 0 to 5 worked well, but felt that the three rating (satisfactory) was too broad and could be changed. They explained that they felt some businesses were content to stick with a three, because they felt it was good, when actually it is a satisfactory.

“I think that the 3 rating, which is just satisfactory, it's too broad. 3 is a satisfactory is not a great rating. People think a 3 is maybe okay, but maybe there needs to be more explanation or change there because 3 is not very good.”
(LA representative from Northern Ireland)

LA representatives from England spontaneously discussed views on whether remote inspections could be an alternative intervention for low risk businesses, as a way of maximising resources and time. One group felt this would be helpful in allowing them to prioritise visiting businesses that were in more need of an in-person inspection.

“Can we start doing remote inspections for low risk premises because we have got a massive backlog. Loads of premises have been waiting inspection that we can't even get to. They've been there for quite a while.”
(LA representative from England)

However, some LAs in England felt that remote inspections were not an appropriate alternative to in-person inspections, because they did not allow for a comprehensive and consistent assessment of food hygiene standards.

There were also some discussions in England about making changes to the parts of the inspections that related to confidence in management. They explained that they are required to apply these criteria on a revisit, but inspectors often have doubts about whether managers are actually serious about food hygiene. This is particularly the case if they have recently given a business a poor rating, and they think the main driver of the requests for reinspection is to meet requirements for online aggregators. Others wanted specific improvements to aspects of the Brand Standard (a guide that ensures consistency in the implementation and operation of the scheme by LAs) to improve clarity and ensure consistency in how businesses are inspected. Discussing this in detail was beyond the scope of the study.

“As a region, even if everything's great at that point, we'll still consider not giving a top score for confidence in management because it's only 3 months since they were very poor.”
(LA representative from England)

Furthermore, LA representatives from England and Northern Ireland suggested making alterations to the confidence in management part of the rating structure. A number of representatives from both nations suggested that the lack of flexibility around rating confidence in management meant that they could not always give a fair assessment of the business. LA representatives also suggested it is sometimes hard to have confidence in management if they have only recently given out a low rating to a business.

“The thing that I wanted to raise was about the confidence in management scoring and the fact that there isn't a 15 and sometimes I wish there was.” (LA representative from England)

“With food hygiene, essentially, there's a score of 15, and structures are 15, whereas confidence in management there's no 15. So, you're either a 4 or a 1. So, there's no 0 or 5, 10, 20 and 30. It'd be good if there was an in between”

(LA representative from Northern Ireland)

Value of FHRs Local Authority research: Chapter 8 Conclusions

LA representatives from across all three nations were positive about the current FHRs and its role in increasing consistency for regulating food hygiene standards in food businesses.

Assessing food hygiene standards consistently was seen a crucial feature of the FHRs, and fundamental to the value of the scheme. While this consistency was considered a strength in Wales and Northern Ireland, LA representatives from England highlighted some differences in how the scheme is managed.

Overall, LAs did not point to specific types of business that they particularly valued being in the scheme. Instead, they emphasised the importance of providing consistent information about food hygiene standards to the public, supporting consumer confidence and choice. Some LA representatives in England discussed whether lower risk retailers could be exempt from the scheme.

LA representatives described challenges associated with re-assessments including the role of online aggregators (like Deliveroo, Just Eat and Uber Eats) as a driver for re-assessments; They explained how the introduction of fees for re-assessments has led to an increased demand for quicker re-assessment visits from businesses who are now paying for them and described problems with businesses re-registering to avoid low ratings and charges.

In Wales and Northern Ireland, mandatory display was strongly supported by LA representatives and seen as fundamental to the effectiveness of the FHRs. There was also support for introducing mandatory display among LA representatives in England. However, LA representatives in England had some concerns about the practicalities of enforcing mandatory display.

LA representatives from Wales were strongly opposed to any changes to inspection frequency based on compliance. Similarly, LA representatives from Northern Ireland had reservations about reducing inspection frequency based on compliance for higher risk businesses. In England, views on reducing inspection frequency based on compliance were more mixed, reflecting LA representatives' experiences of having to prioritise resources over recent years.

Whilst LA representatives from Wales were unanimous in their support for the existing scheme, LA representatives from England and Northern Ireland each suggested some changes. LAs from England discussed improving the scheme through the introduction of mandatory display of FHRs ratings, and reviewing the types of low risk businesses included in the scheme. LA representatives from Northern Ireland felt that the scheme generally worked well but that some changes could be explored, including the meaning of the different FHRs ratings.