

Remote assessments for FHRS requested re-inspections: Introduction and methodology

The Food Standards Agency (FSA) is responsible for the Food Hygiene Rating Scheme (FHRS). The FHRS provides consumers with information about the food hygiene standards of places selling food through a rating system. Local authorities (LAs) are responsible for managing the inspection of food business operators (FBOs) to provide them with their hygiene rating. If an FBO receives a hygiene rating of between 0 and 4, they can request a re-rating inspection ('hygiene re-rating') from their LA. In their Covid-19 LA Recovery Plan ([footnote 1](#)), the FSA enabled LAs to carry out re-rating inspections remotely (a 'remote assessment') if the non-compliance was structural or related to documentation.

In 2022, ICF were commissioned by the FSA to evaluate the use of remote assessments for hygiene re-ratings in England. The specific study questions are set out in Annex 1 alongside the sections of the report that respond to them. Overall, the study looked to understand:

- Perceptions and experiences of remote assessment for hygiene re-ratings among LAs and FBOs;
- How LAs are using remote assessments for hygiene re-ratings;
- Benefits and limitations of remote assessment for LAs and FBOs; and,
- Barriers and facilitators to use of remote assessment by LAs.

Additionally, the FSA are currently modernising the delivery of official food hygiene controls by LAs ('the food hygiene delivery model review'). The evidence gathered in this study will be used to inform future decisions on hygiene official controls and how they are carried out by LAs as part of this wider piece of work.

Context

The FSA is a non-ministerial government Department, covering England, Wales and Northern Ireland, whose [mission](#) is 'to protect public health and consumers' wider interests in relation to food'. The FSA as the Central Competent Authority have responsibility for the oversight of LAs delivery of official controls in food and feed businesses. This includes oversight of the FHRS.

The [FHRS](#) provides an assessment of FBOs' food hygiene standards for consumers. It applies to FBOs where food is supplied, sold or consumed. Official controls are carried out by LAs to verify FBOs compliance with applicable food law. The frequency of these official controls is based on risk, ranging from every six months for higher risk businesses, to every two to three years for those that are lower risk. Where a hygiene rating is to be provided, these official controls should be in the form of an inspection or audit and will assess food handling, the physical condition of the business, and the food hygiene management processes in place. A rating will then be provided to the FBO ranging from between 0 (urgent improvement required) to 5 (hygiene standards are very good). If an FBO receives a hygiene rating of between 0 and 4, they can request a re-rating inspection from their LA, with the aim of obtaining an improved rating once they have addressed the non-compliances observed during their inspection or audit.

During the Covid-19 pandemic, official FSA guidance to LAs (unpublished) was updated to reduce in-person visits to FBOs. It allowed LAs to identify key focus points for subsequent onsite visits using remote technologies, such as video calls and remote sharing of photos and

documentation. This was expanded upon in the FSA's Covid-19 LA Recovery Plan (applicable from 1 July 2021) to allow LAs in England to carry out hygiene re-ratings remotely if the non-compliance related to either structural non-compliances (i.e. relating to the physical building, food storage or preparation areas etc.) or documentation (i.e. business management records on food safety: internal checks, procedures, staff training etc.). This is known as a remote assessment. As FHRS is statutory, LAs in Wales and Northern Ireland were not permitted to use remote assessment.

Methodology

The study comprised of exploratory interviews, desk research and qualitative interviews with FBOs and LAs. Challenges in reaching LAs and FBOs with experience of remote assessment and FBOs meant that the majority of interviews were with those who had limited exposure to this concept. As such, some of the research questions (listed in Annex 1) were explored theoretically with LAs and FBOs. This means the findings are based on a combination of direct experiences and perceived ideas about remote assessment.

A full outline of the challenges and mitigation measures taken in relation to the study is provided in Annex 2.

Exploratory interviews and desk research

A review of data and documentation provided by the FSA and exploratory interviews took place during the inception stage of the project. The purpose of these activities was to:

- provide context, to ensure ICF researchers' understanding of remote assessment and the FHRS (including hygiene ratings and re-ratings);
- inform sampling for LA interviews;
- inform development of the qualitative topic guides for interviews with LAs and FBOs; and to,
- guide analysis and reporting.

Four exploratory interviews were carried out with six FSA representatives. This included the FHRS team, the Food Hygiene Delivery Model Review team, the LA Engagement team and a staff member with knowledge of implementing remote assessment in relation to food standards controls.

During the fieldwork stage of the project, LAs with experience of delivering remote assessments were also asked for any documentation on internal processes relating to carrying them out, and any information or guidance that they sent to FBOs who were receiving a remote assessment. The purpose of this was to better understand how they navigated and delivered remote assessment. However, few LAs had any such documentation, therefore the sources obtained came from just two LAs. These are also set out in Table 1.

Table 1. Data and documentation provided by FSA and LAs respectively.

FSA	<p>Three documents and one data set in total, encompassing:</p> <ul style="list-style-type: none"> • Official FSA guidance on remote assessments from during the pandemic; • FSA Covid-19 LA Recovery Plan guidance and corresponding Q&A issued to LAs (footnote 2); • Data from a 2021/2022 FSA survey of LAs relating to their use of remote assessment for food hygiene re-ratings; and, • Data on hygiene re-rating costs charged by LAs to FBOs.
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LAs	<p>Four documents provided by two LAs, encompassing:</p> <ul style="list-style-type: none"> • An invite for a remote assessment that an LA had sent to FBOs; • Internal guidance documents for LA staff on delivering a remote assessment; and, • Documentation on the LA's hygiene re-rating process.
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Interviews with LAs

In the 2021/2022 FSA survey data, 63 out of 304 LAs indicated that they had used remote assessment for a FHRs requested re-inspection. This data was used in information on LA type (Unitary, District etc), region and area (urban / rural), as well to design a sampling strategy. The strategy proposed a sample of 20 LAs: 15 that had reported using remote assessment for a hygiene re-rating in the survey, and five that had reported not using it. Each LA was matched as closely as possible to a potential replacement LA, in the case that the preferred LA was unavailable for an interview. The FSA invited these 40 LAs to consent to participate in an interview with ICF. Some LAs did not respond at all or declined to participate in an interview. Several LAs that did respond indicated that they had not used remote assessment for hygiene re-ratings, sometimes in contradiction of their responses to the 2021/2022 survey.

As such, ICF and FSA agreed that the invite to LAs should be expanded to all LAs that indicated they had used remote assessment for hygiene re-ratings in the 2021/2022 FSA survey, alongside a random selection of 80-100 other LAs. All LAs that responded confirming they had used remote assessment for hygiene re-ratings were interviewed and a sampling frame was developed for the remainder who reported not using remote assessment, in order to achieve as diverse a mix of LAs as possible.

In total, 40 LA stakeholders consented to participate in the research. Of these, 22 were invited to an interview by ICF. Interviews were successfully carried out with 20 and two did not respond. A breakdown of the LAs interviewed is set out in Table 2.

Table 2. Breakdown of LAs interviewed

Criteria	Value	Number of LAs interviewed
Used remote assessment for a hygiene re-rating (footnote 3)	Never used remote assessment for re-ratings	14
	Previously used remote assessment for re-ratings	4
	Currently using remote assessment for re-ratings	2
LA type	District	9
	London Borough	3
	Metropolitan	3
	Unitary	3
	County	2
Urban / rural	Predominantly urban	12
	Predominantly rural	7

Criteria	Value	Number of LAs interviewed
Urban with significant rural	1	
Region	North East	1
	North West	2
	East of England	3
	South East	3
	London	3
	South West	3
	Yorkshire & Humber	2
	West Midlands	2
	East Midlands	1

Interviews with FBOs

LAs that had used remote assessment were asked to disseminate an interview invite to FBOs that had been re-rated through a remote assessment. However, this approach was subsequently expanded (due to low use of remote assessment and challenges accessing FBOs through LAs) to include:

- FBOs that had received a physical hygiene re-rating within the last year, for the purposes of a theoretical discussion about how they would have felt had this been undertaken remotely – LAs were asked to invite these FBOs to participate in an interview.
- National FBOs, to better understand how use of remote assessment for hygiene re-ratings by LAs could impact their organisations - FSA gained support from an FBO representative organisation, who assisted in disseminating the interview invite to a network of national FBO employees with responsibility for food hygiene.

In total, 15 FBOs consented to participate in the research. All 15 were invited to an interview by ICF. Interviews were successfully carried out with ten, and five did not respond. A breakdown of the FBOs interviewed is set out in Table 3.

Table 3. Breakdown of FBOs interviewed

Criteria	Value	Number of FBOs interviewed
Experience of receiving a remote assessment for hygiene ratings or re-ratings	Yes	2
	No	8
Number of premises	No permanent site (shared kitchen)	1

One site	2	
Multiple sites (ranging from around 55+ sites to 1000+ sites)	7	
Size	SMEs	3
	Large enterprise (250+ employees)	7
Type (primary)	Restaurant / Takeaway	2
	Pub	1
	Cafe	2
	Retail	1
	Holiday / leisure resort	1
	Travel food chain	2
	Charity	1

1. FSA (2021) Covid-19 Local Authority Recovery Plan: guidance and advice to local authorities for the period from 1 July 2021 to 2023/24.
2. FSA (2021) Covid-19 Local Authority Recovery Plan: guidance and advice to local authorities for the period from 1 July 2021 to 2023/24.
3. For the purposes of the study, and in order to assess use of remote assessment for hygiene re-ratings by LAs, only LAs that were carrying out re-ratings entirely remotely at the time of interview (or had done in the past) - i.e. with no prior or subsequent in-person inspection - were considered as having used remote assessment currently or previously. This is because self-reported use of remote assessment for hygiene re-ratings by LAs is an unreliable source due to their uncertainty as to what constitutes a remote assessment.