

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 FHS 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)