

# Remote assessments for FHRs requested re-inspections: Views on remote assessment for hygiene re-ratings

## Overall support for remote assessment for hygiene re-ratings

Support for remote assessment among LAs was very mixed, with some enthusiastic about it while others were largely ambivalent. A common theme across all LAs was that the exact situations in which a remote assessment was appropriate for use (according to current guidance) were infrequent, limiting its usefulness. There was more consensus around the usefulness of hybrid approaches for food hygiene ratings and re-ratings, as indicated by their widespread application.

Among the 14 LAs who had not used remote assessment for re-ratings, there was little interest to use it in the future. With the relaxation of Covid-19 social distancing advice, remote assessment was a low priority as they could carry out in-person visits to FBO premises again. The low number of re-rating requests received meant a remote assessment was unlikely to significantly impact LA resourcing. Some of these LAs felt that a remote hygiene re-rating should always be followed up with an in-person visit. Nevertheless, these LAs did tend to recognise the benefits of it in certain situations. Around half had also continued to apply hybrid approaches towards hygiene re-ratings post-pandemic, and the remote assessment guidance had been an influencing factor in the adoption of these approaches.

"We found our [hybrid approach to remote assessment] is a useful assist, but it's infrequent that [remote assessment] could be used on its own. We'll keep the model we've used as it's been successful in staying engaged with businesses, keeping an eye out for them, staying interested in their progress and not simply being like 'okay, that visit is done' and that's it for the next three years. The appreciation for this relationship is reciprocated by businesses if it's handled well. Polite correspondence is encouraging, it might incentivise [the FBO] to make improvements rather than just sit back." – Unitary LA, predominantly urban area

Most the LAs with experience of remote assessment would either be open to using it again, or had continued to use it. A couple of these LAs had positive experiences of using remote assessment for hygiene ratings, but had stopped after recognising that they were violating FSA guidance.

FBOs were generally open to the idea of remote assessment providing it was delivered consistently, and to a sufficient standard which was underpinned by clear guidance. Among large enterprises with multiple sites, some FBOs wondered if it could improve standardisation of the hygiene rating and re-rating process as a whole (given that it was inconsistent across LAs). Most interviewed FBOs had not received a remote assessment. Of the two that had (a large enterprise and an SME), the experience had been positive and they were willing to have one again. However, they both felt in-person visits needed to be retained for FBOs with lower levels of compliance. The specific experiences of these FBOs are detailed in a vignette (Box 3) in Annex 3.

## Circumstances where remote assessment is suitable

LAs and FBOs tended to agree on the situations where remote assessment was most likely to be suitable. These were:

- When FBOs represented lower levels of risk because the type of business they ran and the food they dealt with. Examples provided included people selling home cooked food in small quantities (like domestic bakers) and retailers that sold smaller quantities of pre-packaged goods – "[Remote assessment] worked well in lower-risk premises such as home bakers as the type and amount of food is lower risk to public health" – Metropolitan LA, predominantly urban area.
- When FBOs were highly compliant, e.g. those consistently achieving hygiene ratings of 4 or 5.
- When FBOs had only structural non-compliances or issues relating to documentation, in line with the current FSA stipulation – "We already interact with FBOs regularly via e-mail and they send us photographs and all sorts of things so, if someone had to correct something in relation to the structure and that was the only issue there, why not just send me an email or photograph? It seems like a no-brainer really" – District LA, predominantly urban area.
- For triaging purposes, to assess risk and prioritise in-person inspections accordingly – either for a hygiene rating or a re-rating – "We used [remote assessment] as a screening tool, not to do a hygiene rating, but to see which businesses would need visits quicker. It helped us prioritise who we could leave for longer." – District LA, predominantly urban area.
- When the LA had a high level of trust in an FBOs food safety management ability and attitude, e.g. because the FBO had a history of compliance, there is an existing strong relationship between the LA and the FBO, and/or the LA had previous knowledge of the premises. This could be at an EHOs discretion, with use of remote assessment determined on a case-by-case basis.
- If an LA was contending with staff/resource shortages and/or high numbers of re-rating requests – "I see why a remote inspection is beneficial – it frees up the council's time so that if they need to concentrate on other businesses not up to spec they can help with that." – FBO (SME).
- If both LAs and FBOs have strong technological capacity, including internet speed for FBOs, making video calls easier to carry out and documents easier to share.
- When FBOs had only a small number of isolated non-compliances that needed to be addressed.

However, in all cases, LAs and FBOs were wary: there was recognition that issues resulting in a lower hygiene rating were not always isolated, and that FBO standards could change quickly, so EHO discretion and prior knowledge of a premises should be a key consideration for any remote assessment.

Additionally, there was consensus across LAs and FBOs that remote assessment was definitively not appropriate in some circumstances. Specifically:

- When FBOs had low levels of compliance (typically perceived as those receiving hygiene ratings of 3 or below) or where multiple non-compliances had been identified.
- When FBOs represented a greater risk due to the food products being prepared and the environment they operated in. For example, takeaways were seen as having a higher food poisoning risk due to the food being handled (e.g. raw meat products) and being faster-paced settings.
- When non-compliance issues related to cleanliness and hygiene, allergens and/or pest control, because it was felt these could not be adequately assessed remotely.

## **Benefits of using remote assessment for hygiene re-ratings**

Interviewed LAs and FBOs generally agree on the main benefits of remote assessment and hybrid approaches.

## **Staff time**

Most LAs and FBOs recognised the potential for remote assessment to save staff time. For LAs, this primarily related to travel time. This was particularly pertinent in LAs covering vast rural areas, as FBOs were more spread out. This effect was specifically noted by two of the LAs that had used remote assessment. A few FBOs noted the potential travel time savings for LA EHOs, stating that this was positive because it could instead be used to support new FBOs and those with lower levels of compliance.

"Our district is very rural and about 50 miles long, meaning that for low risk businesses it could easily save 1.5 hours travelling." – Unitary LA, urban with significant rural area

A remote assessment or hybrid approach could also save staff time during the in-person inspection itself. This was because much of the information reviewed during the visit could be done in advance instead. For example, LAs could assess FBO documentation and other supplied evidence before any inspection (whether in-person or remote). For FBOs, this was beneficial because they would not need to spend as much time with EHOs if the inspection was arranged for a particularly busy period. Additionally, several LAs and FBOs felt that remote assessment for a hygiene re-rating was likely to be less onerous on FBOs overall. A pre-arranged remote assessment meant FBOs could choose a quieter time of day, limiting the disruption to their business. From the perspective of LAs, it also meant EHOs would not arrive at the premises to find the manager was not present.

"A lot of the conversation is over digital means, and that made the rescore inspection visits quite quick." – Unitary LA, predominantly rural area

"FBOs really like the idea of a remote assessment because when they're busy they're busy, and for them, us turning up while they're operating will cause them a lot of stress but actually being able to take the time to get the information and send it over rather than having to do that when you're standing over them, they found that quite positive." – District LA, predominantly urban area

Another expected benefit was enabling FBOs to get a revised hygiene rating faster. For example, one large enterprise stated that they had a large volume of evidence from regular independent inspections at their premises, which they could rapidly provide to LAs alongside anything else that was required. LAs could in turn use it for the basis of a re-rating, without having to visit in person.

"A benefit could be that re-ratings could be done more quickly, so the businesses could turn poor ratings around quicker. At the moment, the average is 2-3 weeks for the re-rating inspection which is okay, however we get a 3-month window and some LAs complete them on the very last day possible." – FBO (Large enterprise)

"I can see the benefits – it's more flexible with time, there's less people involved, it would be a faster process." – FBO (SME)

## **Costs**

Three LAs (all in predominantly rural areas) either expected or had seen a reduced delivery cost of remote assessment compared to an in-person inspection. This was associated with the reduction in staff travel time and corresponding expenses (e.g. fuel). One LA estimated their remote assessment cost was around £18, compared to between £20-£40 for an in-person visit. However, it was noted that the impact on LAs' overall hygiene re-rating costs overall was likely insignificant, because the situations where it could be used were too infrequent to have a notable effect.

Six FBOs also expected to see a reduced cost for a hygiene re-rating in LAs that charged for them, if a remote assessment was being used. One FBO stated that increased onus would be on the FBO to provide evidence, and this should be reflected in the cost of remote assessment for re-rating. Another FBO noted that current charges were based on EHO time and travel cost (as the legal basis for the charge is cost recovery), and as this was being reduced by using a remote assessment it could be expected that the cost to FBOs should be reduced too.

This was not a surprise to LAs that were charging for re-ratings: eight LAs noted that FBOs wanted value for money and would be unwilling to pay the same amount for a remote assessment as was already charged for an in-person inspection.

"There would be savings on time and fuel, which is good for us and for the FBOs. This is because our current charge is based on time, mileage and admin costs (and agreed upon with neighbouring LAs to be reasonable). It would be interesting to review this if they did change their policy to incorporate remote assessment, as we'd have to create a two-tier approach...It could become complicated." – Unitary LA, urban with significant rural area

## **Benefits specific to LAs**

Other benefits of remote assessment and application of hybrid approaches for LAs were mentioned during interviews.

They gave LAs more flexibility in the approaches they could take to hygiene re-ratings. This was reflected in the large number of LAs that had adopted hybrid approaches in relation to ratings and re-ratings (see section on Hybrid approaches to hygiene re-ratings). These approaches facilitated closer ongoing contact between FBOs and LAs by providing an opportunity for interventions in between hygiene ratings, supporting FBO compliance.

"[An advisory visit] is where somebody who wants to start [a new FBO] might ask - can you come out and tell me what I need to do in this unit? We don't have time for that [in-person]. So that would be very good one to do remotely. You could get a lot of information by just scanning the phone around and seeing what the layout the room looks like and what might be missing." – District LA, predominantly rural area

Some LAs felt that utilising videos/photos could potentially provide better quality evidence than what was obtained via the Alternative Enforcement Strategy (AES) ([footnote 1](#)) questionnaires. Often, the response rate to AES questionnaires was low, and it was time consuming for LAs to chase FBOs for responses. Additionally, the data obtained was less substantive: "Is a food business really going to admit on an audit form that they're infested with fruit flies?" (District LA, predominantly urban area). One LA found a remote assessment actually offered an improvement on the data collected during an in-person inspection because it was stored electronically rather than handwritten by an EHO.

"The good thing is then having that record on the system, so obviously if an inspector went out, sometimes they might have a hand-written pro forma or a note of what they've seen, but with [remote assessment] you have a more permanent record of the work that's been improved and more detailed than you perhaps would capture in a note." - District LA, predominantly urban area

Application of remote assessment had supported at least a few LAs to reduce their hygiene rating and re-rating backlog that had built up during the pandemic. For the two LAs using remote assessment for ratings (in contravention of FSA guidance), it had enabled them to prioritise in-person visits to the least compliant FBOs.

There were also indirect benefits identified from the use of remote assessments too. A couple of LAs felt the reduction in travel time had the knock-on positive effect of reducing their environmental impact, aligning with the LA Green Agenda. One LA also noted there was a

potential benefit to the work-life balance of staff, as they had flexibility in where they carried out a remote assessment from (e.g. they could work from home), and it would take less time in their working day.

"There's massive environmental benefits too, due to less travel. Staff that don't work in the area can also still work remotely... Their work-life balance is better due to the reduction in inspection time." – District LA, predominantly rural area

## **Benefits specific to FBOs**

The primary additional benefit theorised for FBOs was that the more widespread use of remote assessment by LAs could improve consistency in LA approaches. Large enterprise FBOs with multiple sites frequently mentioned some of the frustrations they had were due to differences across LAs. Observations included variations in:

- The level of detail contained in inspection reports received by FBOs, with some making it easier to identify and rectify non-compliances than others;
- Whether or not inspection reports were electronic or handwritten (with handwritten reports being more difficult to read);
- The evidence required to request a re-rating, with some only requiring photos of the rectified non-compliances, while others would require a detailed list of actions that the FBO had taken; and,
- How reference numbers were managed, with some LAs cancelling reference numbers for a site when a new operator took over - this was inconvenient for FBOs with multiple sites, who relied on these numbers to monitor the hygiene ratings of their sites.

FBOs theorised that promoting use of remote assessment could provide an opportunity to ensure LAs were approaching hygiene ratings and re-ratings in a standardised way.

"It can be challenging seeing different approaches LAs take to re-ratings. It could be more consistent if it was remote." – FBO (Large enterprise)

## **Drawbacks of using remote assessment for hygiene re-ratings**

LAs and FBOs similarly shared views on the drawbacks of remote assessment.

### **Validity of remotely assessed hygiene re-ratings**

The most widely perceived drawback to using remote assessment for hygiene re-rating was the expected reduced validity of hygiene ratings that were given when using it, compared to scores provided following an in-person inspection.

A key issue for both LAs and FBOs was that a remote assessment was ultimately under the control of the FBO. When they took photographs they could hide problems, and even during video calls they could control what an EHO saw. In one LA's experience, FBOs sent through photographs before changes were fully complete in the hopes of being rewarded, so verification in person was crucial. Similarly, another LA stated that they would sometimes receive documentation that met a high standard, but the premises would still fail to meet requirements on inspection. This meant it was unrealistic to rely too heavily on documentation. In one instance, an FBO had responded to AES questions well and been allocated into a low-medium risk category. However, a complaint was filed about them the following week and when the EHO went to inspect the premises they received a hygiene rating of only '1'.

"Things can be made to look lovely with a flash and a filter." – Metropolitan LA, predominantly urban area

"Photos are only as telling as the sender wants them to be." - FBO (Large enterprise)

Additionally, a remote assessment did not allow EHOs to pick up on the sensory aspects present in an in-person visit, such as smells, staff behaviour, smaller details that may be harder to see on camera (e.g. mice droppings), fridge/freezer temperatures, and characteristics of outdated food.

"It's the softer and sensory things you miss like smells... feel... vibe from people... whether you trust that person." – District LA, predominantly rural area

"Officers can't be nose-y [with remote assessment], like looking behind doors and cupboards, opening things. [FBOs] find it easier to say no to these things when it is done remotely." – District LA, predominantly rural area

Finally, the 'surprise' element of a hygiene re-rating was often lost with remote assessment. LAs and FBOs believed that if FBOs had a scheduled re-rating inspection, they could plan ahead to be on their best behaviour and this might not reflect 'business as usual'. One FBO suggested a potential solution could be for LAs to tell the FBO that they would receive a video call at random within a specific time frame (e.g. one month), and that if they did not take this call they would be subject to the in-person visit. In general, LAs and FBOs felt a remote assessment would be more appropriate if it was always unannounced.

"If it changes from unannounced to announced, that's a big shift in the whole idea of inspections. If it's announced, does it undermine the point of FHRs? Is it giving the assurance?" – FBO (Large enterprise)

## **Other drawbacks of remote assessment**

There were concerns that EHOs could look at issues in isolation when undertaking a remote assessment, when even structural non-compliances or documentation issues could indicate wider problems in an FBO. As a remote assessment focused on the specific non-compliances related to the original rating, EHOs may miss the opportunity to identify other issues present on the site.

A remote assessment could also negatively impact the working relationship between LAs and FBOs because EHOs could not provide 'hands-on' guidance and advice. For a few FBOs, this relationship was important in allowing them to demonstrate their good practice as well as to make improvements. One FBO stated that the working relationship between their sites and local EHOs was crucial because their hygiene ratings were linked to their licensing rights for gambling and liquor.

"FBOs value seeing someone, rather than having to deal with another piece of paperwork." - District LA, predominantly urban area

"People who work in hospitality are very show-me, tell-me people. The value of having face-to-face is so important that it adds a lot of weight to why they have to do certain things." – FBO (Large enterprise)

Several LAs questioned whether remote assessment would save them time, due to the 'back and forth' of liaising with FBOs. Sometimes remote assessment took longer than a face-to-face revisits. FBOs were surprised to receive an unexpected call from their LA so would ask for proof, increasing the inspection time as the LA had to send an email to them. FBOs could also send a large volume of documents to LAs, but not all would be relevant. This meant additional time for the LA to go through them. The need to chase FBOs for documentation could negate any potential efficiency benefits. Other issues included FBOs getting side-tracked during calls, and difficulties in actually organising the re-rating with an FBO.

"It was very easy to cancel appointments, so a lot of FBOs would rearrange and wouldn't be available...it's so much easier to go out and physically knock on the door." - District LA, predominantly urban area

## Barriers to use of remote assessment for hygiene re-ratings

There were various barriers to use of remote assessments for re-ratings by LAs. These included internal barriers (those impacting use of remote assessment at an organisational level within LAs) and external barriers (external challenges encountered by LAs and faced by FBOs).

### Internal barriers

LAs frequently mentioned challenges gaining buy-in from EHOs. This was primarily driven by uncertainty and lack of confidence in remote assessment. They were worried about doing something wrong and getting in trouble for it. Some LAs also mentioned that EHOs had been keen to pick up in-person visits post-pandemic, as a means of building engagement with FBOs and to support them to improve.

"A big challenge is that [EHOs think that] remote can never be as good as physical – some of [the EHOs] have been doing the job for 25 years, so are very resistant to new ways of doing things." – Metropolitan LA, predominantly urban area

"Many years ago FSA were quite fierce with LAs and [EHOs] got nervous about being picked up about not doing proper inspections. We try to say: look, this is an instruction from the food lead, so if something goes wrong, it's not your problem." – County LA, predominantly urban area

Limitations in FSA guidance and lack of clarity of the FSA position on remote assessment was a barrier for several LAs. This is discussed at length in section on How LAs define remote assessment.

here were concerns about how to implement a two-tier system for costing re-ratings. LAs that charged FBOs for re-ratings recognised that a remote assessment would generally cost less, so FBOs would expect to pay a reduced amount. These LAs would therefore have to implement different charges for a remote and in-person re-rating, which could cause confusion. LAs would need to justify when remote assessment was used, and ensure FBOs did not challenge the charge. LAs typically took payment for re-ratings before the remote assessment took place. As such, if a remote assessment was used and it became apparent they would then need to go into the FBO premises in-person, the LA would potentially need to ask the FBO for an additional payment. LAs speculated that this could take more time than if they had just visited the premises in-person in the first place. This is of note given that the large majority of LAs in England (82%) charge FBOs for hygiene re-ratings ([footnote 2](#)). The concern of LAs was not unfounded either: several interviewed FBOs stated that they would expect to see a lower cost for a re-rating if it was to be carried out remotely.

Some LAs faced technological barriers to using remote assessment. This included outdated systems, having no licensed video calling software, and size limits on emails they could receive which meant information sent to them by FBOs would bounce. There were also EHOs who struggled with new technology, contributing to an unwillingness to use remote assessments.

"Some of the team were much better with technology; one [EHO] has hearing difficulties so they struggle with virtual inspection, so they mainly use email. Our systems are outdated which makes [remote assessment] harder - attachments fail, there's crashes..." – District LA, predominantly urban area

"And I have to say, the officer that was doing the remote triage wasn't comfortable with the technology. I think you'd need good IT skills because you do have to type while you're talking." –

District LA, predominantly rural area

## External barriers

The primary barrier to use of remote assessments for hygiene re-ratings was the low number of eligible re-rating requests that LAs received from FBOs each year. In the few cases where interviewed LAs were able to estimate the number of re-rating requests received each year, this equated to 2% to 4% of all the ratings they carried out. For example, a few LAs reporting similar numbers of hygiene ratings taking place each year (around 500-600), all stated that they only received 10-15 re-rating requests annually. A larger LA that carried out more than 1,800 hygiene ratings each year stated that only 60-70 of these would lead to re-rating requests. Additionally, the FBOs that requested re-ratings generally did not fit the criteria for a remote assessment. This was because it was FBOs with lower hygiene ratings that typically had more interest in obtaining a re-rating – often because food delivery aggregators (e.g. Deliveroo, JustEat) asked for a minimum hygiene rating. As such, scenarios where LAs could actually utilise remote assessment for a hygiene re-rating were infrequent. This meant it was difficult for LAs to see the value in investing in remote assessment, as they were unlikely to see a significant impact on their costs.

“Out of about 450-500 ratings, there have only been maybe 12 re-ratings maximum in a year. People only ask to be re-rated if they're at risk of being removed from aggregators due to their low rating. I asked the team, and they did not think they had done any [remote assessments for re-ratings] at all, as they do not meet their set criteria. We need more flexibility in the guidance.” – District LA, predominantly rural area

“[The FSA guidance] was confusing, I can't see how it would be appropriate in any scenario: most re-rates are not appropriate due to the types and level of non-compliance... There's not enough resources to implement it properly with all of the other things the LA have to consider.” – District LA, predominantly rural area

Like LAs, FBOs did not always have the technological capacity to receive a remote assessment. Some FBOs did not have smart phones, FBO staff could find it difficult to navigate new apps or technology that they had not used before (like Teams), and there could be connectivity issues, even in city centres. This was particularly pertinent to smaller FBOs and those that were mobile (e.g. food vans), who would not always have their own Wi-Fi set up. However, there were challenges in larger enterprises too - sometimes computer access was restricted and company policy stated that documents could not be shared externally. This meant the only way for EHOs to review them was to visit in-person. Likewise, a large enterprise FBO stated that kitchens on some sites might be in basements or areas where mobile or Wi-Fi signal could not reach. Sometimes older FBO staff members lacked confidence in technology too – one SME FBO owner was over 70, and stated that they needed support from a younger family member to receive a remote assessment.

"[We're] not sure about FBOs ability to use certain technology. Most have internet connection, but some of the smaller businesses (particularly those run by older people or those with language barriers) may not be able to communicate in this way at all, or communicate in this way effectively." – Unitary LA, urban with significant rural area

LAs covering smaller geographies of densely populated, urban areas where FBOs are in close proximity to one another had little incentive to use remote assessment, as there was no significant travel burden associated with in-person visits and therefore any potential cost or time savings were limited.

Language barriers in FBOs where English was not their first language meant it was easier for LAs to communicate with them face-to-face than over telephone or remote means. For example, when visiting in person, EHOs could use the Translate functionality on an iPad to communicate with the staff member.



LAs believed FBOs were generally unaware of remote assessment as a means of carrying out hygiene re-ratings, and this was reflected in a low level of awareness in interviews. There were concerns that this lack of familiarity meant FBOs would therefore be sceptical about the process and potentially put it down to the method if they did not receive the re-rating they wanted.

Some LAs and FBOs had data protection concerns and questioned how data obtained from a remote assessment would be stored to ensure FBO privacy. Without clear direction on how data should be handled, there were concerns remote assessment could lead to improper data storage/sharing by LAs.

## **Enablers to use of remote assessment for hygiene re-ratings**

Among LAs that had used remote assessment or adopted hybrid approaches, several common factors that had enabled them to do so were observed. These were:

- Internal buy-in to the remote assessment concept within LAs as a result of recognition of the potential benefits to costs and/or staff time, from management staff as well as EHOs;
- LAs having existing high quality IT systems, and corresponding EHO competence in use of IT and technology; and,
- Willingness and suitability of FBOs in the LA area to receive a remote assessment / liaise with LAs remotely.

To encourage more LAs to use remote assessment for hygiene re-ratings, and increase confidence in this form of inspection among FBOs, LAs and FBOs wanted to see:

- More detailed guidance on remote assessment delivery for LAs, including clarity on what it is, recommendations on technology to use and guidance on navigating re-rating charges to FBOs when remote assessment is used;
- Clear messaging on remote assessment from FSA to LAs and FBOs, to indicate FSA support, legitimise it as a means of inspection, and increase confidence in its validity; and,
- Increased flexibility from FSA, to enable LAs to choose the scenarios in which to use remote assessment or hybrid approaches.

These suggestions fed into the recommendations made by this report (Recommendations section).

"Essentially, LAs should have more flexibility to choose what interventions they want to do remotely. For both ratings and re-ratings: we need more freedom to prioritise and plan than the FSA's Code of Practice gives us and that's because the hospitality sector is very changeable. The skill shortage means that we should probably look more at training records and that could be done remotely. Also our food premises are veering more and more towards electronic documentation management. So this change could mean that we would choose to do different types of intervention. We need to extend the range of interventions that we're allowed to do. LAs would need to justify what they're doing and monitor how robust it is of course, so that the flexibility is used in the tight way, but it would mean LAs could improve risk management and this is what the FSA want." – District LA, predominantly rural

1. The FSA Code of Practice requires LAs to have an Alternative Enforcement Strategy (AES) for conducting food controls at premises for low-risk FBOs. Rather than visiting FBO premises, the AES allows LAs to send low-risk FBOs a questionnaire or to conduct a telephone interview with them instead.

## 2. FSA data on hygiene re-rating costs charged by LAs to FBOs