

Response template for consultation on developing a modernised food hygiene delivery model (FHDM)



Responses to this consultation are required by **23:59 on Friday 30 June 2023**. Completed consultation response forms should be emailed to hygienemodelreview@food.gov.uk

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Proposed development 1

Question 1. What are your views on the proposed development for a modernised food hygiene intervention rating scheme, including the frequencies for official controls?

IFST are pleased that FSA are reviewing the Food Hygiene Rating Scheme with the aim that resources are utilised most effectively. Nevertheless, the underlying challenges concerning overall skills and resource constraints to effectively carry out all of the necessary work must be considered when looking at the development of the FDHM. The introduction of these flexibilities should not lead to an overall reduction in the level of oversight and risk assessment of food hygiene, and the overall aim should be to build skilled resource to carry out effective inspection and risk assessment.

It is important that the pilot is of sufficient length and scope to allow a true assessment of the risks of the proposed changes to be effectively captured, and that there is a rigorous process to ensure that any necessary changes to the proposal can be implemented.

While it is helpful to allow the flexibility to deploy resources most effectively, clear guidance and training is essential to ensure that these are applied consistently across regions, otherwise there could be different application of the risk assessment process and subsequent food hygiene ratings.

IFST would like to be assured that the time-span between inspections is effective to ensure that the potential for change in business operation can be effectively monitored. For businesses rated low risk inspection intervals of 48-60 months are proposed; this timespan could result in very marked changes in growth, ownership, business focus, as well as external factors as have been seen with the Covid pandemic, food inflation and commodity costs etc, all of which could impact the risk status of a business.

Question 2. What are your views on the identified benefits and impacts for a modernised intervention rating scheme? Are there any further benefits and/or impacts that the proposed development could have? If yes, please outline what these are.

IFST agree that the identified benefits and impacts are likely to target resources on highest risk premises. IFST would like to be assured that the inspection frequencies proposed are manageable with the resources available. IFST welcome the introduction of the Confidence in Management score as a useful addition to the overall assessment.

Question 3. Do you foresee any challenges if the proposed development for a modernised food hygiene intervention rating scheme were to be implemented? If yes, please outline what these challenges are and what, if any, solutions we should consider?

The key challenge that IFST foresee is the availability of adequate training available to ensure that officers are able to implement the new FHRS in a consistent and effective way. The new system allows more flexibility and adequate training would be needed.

IFST are pleased that Confidence in Management is included in the overall rating system, we are strongly of the opinion that management and business culture are critical to good food safety management (see IFST Best Practise Food Safety Governance Guide for Directors (2022): <https://www.ifst.org/resources-policy/ifst-policy/ifst-food-safety-guidance-directors>). Effective training of enforcement officers would be especially relevant to the determination of the Confidence in Management element which appears to be more open to individual interpretation.

IFST are pleased to note that there is inclusion of a specific allergen cross-contamination, however question why this extra compliance element would not be considered when awarding an FHRS rating. FSA are well aware that allergen cross contamination is one of the leading risks associated with food business operation at all levels, and consumer assurance is critical in this regard.

Proposed development 2

Question 4. What are your views on the proposed development for an updated risk-based approach to the timescales for initial and due official controls, including the proposed frequencies?

IFST support the proposed developments to the risk based approach to the timescale for initial and due official controls, including the proposed frequencies.

As the triage process is proposed to determine the 'anticipated inherent risk', IFST would like assurance that clear guidance and defined process is developed regarding the triage process, and to determine the minimum necessary information needed to determine this inherent risk.

Question 5. What are your views on the identified benefits and impacts for an updated risk-based approach to the timescales for initial and due official controls? Are there any further benefits and/or impacts that the proposed development could have? If yes, please outline what these are.

IFST agree that the benefits and impacts are likely

Question 6. Do you foresee any challenges if the proposed development for an updated risk-based approach to the timescales for initial and due official controls were to be implemented? If yes, please outline what these challenges are and what, if any, solutions we should consider?

The key challenge is to ensure adequate training to officers to ensure that the initial assessment of new establishments is conducted in an effective and consistent way to minimise the risk that an establishment is not correctly assessed prior to any initial inspection (see Question 4).

Proposed development 3

Question 7. What are your views on the proposed development for introducing flexibilities as to the methods and techniques of official controls and the use of remote official controls, including factors to consider?

IFST support the proposed development to introduce flexibility to the methods and techniques of official controls and the use of remote official controls.

Question 8. What are your views on the identified benefits and impacts for introducing flexibilities as to the methods and techniques of official controls and the use of remote official controls? Are there any further benefits and/or impacts that the proposed development could have? If yes, please outline what these are.

IFST agree that the benefits and impacts are likely

Question 9. Do you foresee any challenges if the proposed development for introducing flexibilities as to the methods and techniques of official controls, including the use of remote official controls were to be implemented? If yes, please outline what these challenges are and what, if any, solutions we should consider?

Similar to the points highlighted earlier in this consultation response, IFST would like to be assured that sufficient guidance and training is developed to ensure consistent application of the methods and techniques and that officers are equipped to use the methods and techniques and the use of remote official controls effectively.

Proposed development 4

Question 10. What are your views on the proposed development for introducing flexibilities as to who can undertake official controls and other official activities?

IFST would support the introduction of flexibilities concerning who can undertake official controls and other official activities, particularly if this development allows for the development of capabilities and skills in areas of specific need for effective risk assessment. IFST also would like to ensure that the following criteria are mandated for those working in this area:

There are clear guidelines concerning the level of training and expertise required for officers who do not hold a 'suitable qualification' and how this should be monitored to ensure quality of activities performed is maintained.

That it is clear that the overseeing officer has the responsibility to ensure that the overall quality of any review of an establishment is such that the risk(s) are properly assessed.

Question 11. What are your views on the identified benefits and impacts for introducing flexibilities as to who can undertake official controls and other official activities? Are there any further benefits and/or impacts that the proposed development could have? If yes, please outline what these are.

IFST agree with the benefits that have been identified in the consultation document

Question 12. Do you foresee any challenges if the proposed development for introducing flexibilities as to who can undertake official controls and other official activities were to be implemented? If yes, please outline what these challenges are and what, if any, solutions we should consider?

As indicated in Question 10, the key challenge is to ensure that the overall quality of the risk assessment process is maintained, and that overall the use of non qualified officers does not impact the quality of the risk assessment process.

Additionally, IFST would like to be assured that those undertaking these duties receive equivalent training to Environmental Health Officers and others working in situations of potential conflict. For instance EHOs receive full training in conflict resolution, how to protect themselves if physically attacked, are issued with protective equipment etc.

General questions on the proposed developments

Question 13. If the proposed developments were to be implemented, what guidance and/or examples would be useful to assist with understanding and consistent implementation?

There needs to be sufficient guidance for qualified officers to ensure that the flexibilities proposed within this consultation can be implemented in a consistent manner, particularly as identified earlier in this response relating to assessing confidence in management.

The IFST publication 'Best Practise Food Safety Governance Guide for Directors (2022)' would be useful as a guide to assist with assessing Confidence in Management:

<https://www.ifst.org/resources-policy/ifst-policy/ifst-food-safety-guidance-directors>

Question 14. Are there any alternative approaches that could be considered for a modernised FHDM? If yes, please outline what these are.

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Thank you on behalf of the Food Standards Agency for participating in our consultation on the proposed developments for a modernised food hygiene delivery model.