



SCORES ON THE DOORS

CONSISTENCY FRAMEWORK



ALEHM
The Association of London Environmental Health Managers

1. **INTRODUCTION**

- 1.1 This document sets out a framework of measures that all London Authorities that are signed up to the London 'Scores on the Doors' Pilot Project will adopt in order to aim to achieve consistency in the hygiene inspection process and allocation of a hygiene inspection rating.
- 1.2 The framework includes adoption of and adherence to a number of documents produced by the London Food Coordinating Group (LFCG), namely;
- Model Food Hygiene Inspection Procedure
 - Model Monitoring Procedure
 - Food Hygiene Inspection Rating Guidance
 - Star Rating Scheme

2. **'SCORES ON THE DOORS' PROJECT**

- 2.1 The London Scores on the Doors Project involves publication of a star-rating scheme, which will be applied to every food premises. The star rating will be derived from the total of the Food Law Code of Practice inspection rating scheme scores given for; level of current compliance with food hygiene and safety procedures and structure of the premises and confidence in management / control systems. (Appendix 1)
- 2.2 The project includes all food premises subject to food hygiene inspections, with the exception of the following:
- Sole traders operating from a residential address (e.g. home caterers, child minders etc)
 - Premises approved under Regulation 853/2004
- 2.3 Individual authorities that apply the Code of Practice inspection rating to approved premises have the flexibility to include those premises in the scheme if they wish to. However this position will be reviewed with a view to reaching a consistent decision.
- 2.4 It is recognised that some authorities use alternative enforcement strategies (AES) for lower risk premises, as provided for in the code of practice. However some authorities continue to inspect and allocate a revised inspection rating. All lower risk premises will be included in the scheme with, in the case of premises subject to AES, the star rating being derived from the inspection rating that originally led to the premises being deemed low risk. However, only premises subject to AES that have been given an inspection rating from 1st January 2006 will be included on the website.
- 2.5 Authorities that choose to unitise larger premises such as supermarkets, with in-store bakeries and delicatessens etc, or large

hotels with several restaurants and bars, and give these units a separate rating may continue to do so.

- 2.6 At the commencement of the scheme, subject to any limitations detailed above, a star rating will be published for all premises that have been allocated an inspection rating from 1st January 2006. Each authority will, prior to submission, carry out a review of all initial data to ensure it is accurate and does not contain any errors or inconsistencies with typical scoring patterns. A statement will appear on the website to indicate that some premises subject to inspection risk Categories D and E and a small number of Category C premises that have not been inspected since 1st January 2006 will not be featured until they are next inspected.
- 2.7 From the commencement of the scheme each participating authority will, on a weekly basis, submit for inclusion on the project website the updated details of all premises that have been inspected 2 weeks previously. The information will be submitted automatically using a direct data feed from the local authorities existing system to upload to the live website.
- 2.8 Each authority will, prior to submission of the weekly data, carry out a review to ensure that data is accurate and does not contain any errors or inconsistencies with typical scoring patterns. Each local authority will be required to confirm upon request by the LFCG that this review has been carried out. In addition, each authority shall ensure that no 'desk top rated' premises are submitted for inclusion on the website.
- 2.9 Each participating local authority will provide each premises subject to inspection, a sticker and a copy of a certificate that the business may choose to display on the premises. The certificate will be in the agreed project format displaying the London project branding, but may also include the local authority's own logo and contact details. The authority will apply a unique reference to each certificate and sticker. The certificate and sticker will be provided to the business in accordance with the time scales that the authority sets for providing the business with an inspection report.
- 2.10 The certificate and sticker will remain the property of the local authority and may be withdrawn at any time. Where a local authority issues a sticker or certificate to replace an earlier one, they will ensure the original is removed from the premises and destroyed.
- 2.11 The information published on the world wide web will be on a centrally hosted website for all participating authorities. Each authority will have appropriate links to the site from their own local authority site.
- 2.12 The central site will contain standardised information about the scheme. Individual authorities may provide additional information either generally or about the individual premises featured on the site, through

their own website link, at their own discretion. However this information must not contradict or amend the scheme and will be subject to approval by the LFCG. Individual authorities cannot amend standardised information on the site.

- 2.13 The London 'Scores on the Doors' scheme does not allow or accommodate for any authority to carry out a revisit to re-assess a rating following a primary inspection. Even where an authority carries out a secondary inspection (revisit) as part of their normal follow-up procedures, the premises will not be re-rated. Re-rating will only take place at the next primary inspection, in circumstances for 'Early Inspection' defined in the Food Law Code of Practice, or where premises are closed either formally or informally through unplanned inspection.
- 2.14 Some businesses may take remedial action following an 'unsatisfactory' inspection which results in a low 'star rating' and request the authority to re-inspect. In such event the authority will refer the business to the statement on the 'Scores on the Doors' website, which explains the policy of not carrying out revisits to re-rate premises. They will also remind the business of the facility to make written comments about their score, which will, subject to approval by the local authority concerned and the website management be displayed on the website. They may also wish to display written comments adjacent to their sticker or certificate on the premises. The authority may also provide the business with the written summary of the 'Scores on the Doors' scheme, along with details of the complaints process. (see paragraph 6.5.1 below).
- 2.15 It is the intention of the London scheme to drive up standards of hygiene in food premises and the policy of not re-rating premises is intended to encourage businesses to maintain standards at all times.
- 2.16 In order to avoid allegations of unfairness and inconsistency, it is essential that the Project has a robust system of measures in place to ensure, as far as is possible that all participating authorities adopt, apply and adhere to a framework of measures designed to achieve consistency amongst authorities.
- 2.17 It is recognised that many local authorities have robust internal consistency schemes in place. However some of these may require amendment to ensure compliance with the 'Scores on the Doors' scheme.

3. CONSISTENCY OF INSPECTION

- 3.1 Food hygiene inspections must be carried out taking account of the Food Law Code of Practice, issued March 2006 (and any subsequent versions), along with any other recognised guidance issued by the

Food Standards Agency or Local Authorities Coordinators of Regulatory Services (LACORS). In order to aid consistency in this area the LFCG, as part of an action plan following the London Inter Authority Audit in 2000, produced a number of model procedures for adoption by London authorities. One such procedure was the model food hygiene inspection procedure, which has since been updated to take account of the revised code of practice and 2006 hygiene regulations. (Appendix 2)

4. QUALITY MONITORING OF INSPECTIONS

- 4.1 Every local authority must have in place documented procedures for monitoring the quality and consistency of inspections undertaken by their officers, or staff supplied under contract to ensure, so far as practicable, that inspections are carried out competently. Inspections must be carried out in accordance with guidance and procedures as mentioned in paragraph 3.1 above. Accordingly, the LFCG produced a further model procedure on quality monitoring following the 2000 inter authority audit. This model procedure has also been updated in the light of recent legislative changes. (Appendix 3)

5. CONSISTENCY IN APPLICATION OF THE FOOD HYGIENE INSPECTION RATING SCHEME

- 5.1 The Food Law Code of Practice inspection rating scheme must be interpreted and applied in a consistent way by all officers engaged in inspection of premises to avoid the risk that inappropriate ratings are applied, leading to a variation in inspection frequency amongst broadly similar premises.
- 5.2 The LFCG have produced a guidance document to take account of the current code of practice. (Appendix 4) (This document was devised from a document originally produced by the Lancashire Chief Officers Food Liaison Group.)

6. THE CONSISTENCY FRAMEWORK

- 6.1 All authorities participating in the London 'Scores on the Doors' project will be required, subject to paragraph 6.2 below, to sign up to agree to adhere to this framework, including to adopt the 4 documents appended to this document.
- 6.2 If an authority believes it has existing procedures and systems based upon the principles of the model procedures, that are at least equivalent to those procedures and will ensure consistency in scoring of premises, then they may submit those procedures to the LFCG for approval. Where approved, such procedures will automatically replace the model procedures. Any amendments to procedures will similarly be submitted for approval.

6.3 **Training**

- 6.3.1 Every participating authority in the London project will ensure that the food safety manager and at least one of its senior food officers attend the training in managing quality and ensuring consistency, arranged by the LFCG and the Food Standards Agency prior to the implementation of the scheme.
- 6.3.2 Every participating authority will further ensure that staff engaged in inspection of food premises from the date of implementation of the scheme attend one of the training sessions on consistency of inspection and application of the inspection rating scheme, organised by the LFCG and the FSA.
- 6.3.3 Each participating authority will subsequently arrange in-house cascade training for all staff engaged in inspection of food premises, who are unable to attend the organised training, pending their attending an organised update course.
- 6.3.4 Participating authorities will usually carry out such cascade training in conjunction with neighbouring authorities or through the 4 sector liaison groups.
- 6.3.5 The LFCG and the FSA will arrange occasional update courses for new staff.
- 6.3.6 Participating authorities will ensure all new staff and contractors and agency staff have had an appropriate briefing on this framework by managers before commencing inspection of food premises. Managers will then ensure close monitoring of officers until they have undertaken formal training, which will be carried out at the earliest opportunity.
- 6.3.7 Training will be made available by the FSA for private sector contractors who engage in food hygiene inspections.
- 6.3.8 Officers attending courses will receive CPD certification. Each participating authority shall keep records of all staff who carry out inspections, including the date of their receiving training and any update or refresher training. Copies of the records (CPD) shall be made available to the LFCG upon request.

6.4 **Monitoring**

- 6.4.1 Each participating authority will keep records of the monitoring checks it carries out to ensure consistency and quality of inspections and scoring of food premises, along with a list of all staff engaged in inspection of food premises. These records will be made available to the LFCG upon request.

- 6.4.2 As a pilot, once a year the LFCG will select from the premises that are featured on the London 'Scores on the Doors' website 5 premises from each participating authorities area. Each authority will be given 14 days to submit copies of the inspection and scoring records for those premises to the LFCG as a sample for the group to audit for compliance with the requirements of this framework. The minimum that the authority will submit is the inspection rating form, file notes, report to the business, aide-memoire and letter (if any).
- 6.4.3 On occasions the LFCG will select premises from national or regional chains from all authorities to see if these are consistently assessed by officers.
- 6.4.4 Where the LFCG identifies what it believes to be variance between the inspection report and the resultant scoring, the LFCG will bring this to the attention of the local authority's food safety manager.
- 6.4.5 Where it is agreed that that there has been an inconsistency demonstrated by the inspecting officer, the authority concerned shall ensure that appropriate retraining is given to that officer and will monitor that officer until satisfied that consistency is being achieved.
- 6.4.6 As a pilot, each authority will agree to each officer once per year carrying out a joint inspection with a colleague in a neighbouring authority and rate the premises independently to build up a further database of consistency checks.

6.5 **Complaints Procedures**

- 6.5.1 Should any local authority receive a complaint regarding the rating applied to a premise, they should first try to resolve it informally. If this is not possible the authority shall use it's own corporate complaints procedure to resolve the matter. LFCG will upon request by a local authority, convene a panel to advise the authorities complaints procedure.

7. **APPENDICES**

- 7.1 Appendix 1 Star Rating Scheme
Appendix 2 Model Food Hygiene Inspection Procedure
Appendix 3 Model Monitoring Procedure
Appendix 4 Food Hygiene Inspection Rating Guidance