

## **A1.2 Food Standards scoring system**

### **Food Standards Risk Assessment**

The Risk Profile for an establishment is based on two separate risk elements: the Inherent Risk Profile and Compliance Assessment:

- the Inherent Risk Profile considers the inherent risks associated with the business, such as the scale of supply and the potential for product harm
- the Compliance Assessment considers the FBO's performance and track record

Each risk sub-category for Inherent Risk Profile (Table 1) and Compliance Assessment (table 2) has a score of 1-5.

An establishment must be risk assessed against each sub-category within the Inherent Risk Profile and Compliance Assessment elements of Tables 1 and 2.

**Table 1: Inherent Risk Profile – Guidance on the scoring system**

The inherent risks associated with a food establishment.

<b>Inherent risk factors</b>	<b>Guidance</b>	<b>1 Serious hazard</b>	<b>2 Significant hazard</b>	<b>3 Minor hazard</b>	<b>4 Low hazard</b>	<b>5 Very low hazard</b>
<b>Scale of supply and distribution</b>	<p>This factor considers the number of consumers likely to be at risk if the food establishment fails to comply with food standards legislation - the greater the number of customers, the greater the potential impact of any non-compliance. In scoring an establishment consideration may be given to:</p> <p>Activities of establishment in terms of both supply and distribution</p> <p>Establishment type</p> <p>Method of supply, for example establishment to establishment, retail at physical premises, online/distance sales</p>	Establishments supplying/distributing food internationally and nationally (including manufacturers, packers, import /export)	Establishments supplying/distributing food regionally (including wholesalers / distributors, small scale manufacturers, supermarkets).	Establishments supplying/distributing food locally (including manufacturers and large retailers /caterers).	Establishments supplying/distributing food locally, with known local suppliers to the business (including small and local food establishments selling ready to eat food, such as corner shops, cafés and restaurants).	Other food establishments supplying/distributing food locally on a limited scale which have a discrete customer base (including childminders, nurseries, playgroups, bed and breakfasts).

Inherent risk factors	Guidance	1 Serious hazard	2 Significant hazard	3 Minor hazard	4 Low hazard	5 Very low hazard
<b>Ease of compliance</b>	<p>This factor considers the volume and complexity of food standards law that applies to the establishment and with which it has a responsibility to ensure compliance.</p> <p>Consider the range and complexity of products, processes, and services that the establishment is responsible for, such as the provision of food information, the involvement of any third parties in the supply of food, raw materials used and their associated specifications.</p> <p>When scoring this risk factor, take into account:</p> <ul style="list-style-type: none"> <li>• Any product-specific legislation that applies, particularly where the legislation introduces specific compositional or marketing standards</li> <li>• Whether the establishment supplies a wide or limited range of products* subject to different legal requirements</li> <li>• Products where there is evidence of ongoing compliance issues</li> <li>• Protected Geographical Indication or any specific requirements</li> </ul> <p>*Considers the variety of product range for example, multiple product lines/markets. Distinction around wide and limited range in terms of product catalogue, import requirements and product range requiring third party authorisation.</p>	<p>Establishments responsible for producing or labelling a wide range of food products affected by product-specific legislation.</p> <p>Establishments responsible for compliance with legislation where a degree of validation and interpretation is needed, for example food supplements, novel foods.</p>	<p>Establishments responsible for producing or labelling a limited range of foods affected by product-specific requirements.</p>	<p>Food establishments responsible for producing or labelling products not covered by product-specific legislation.</p> <p>This may also include retailers or caterers that supply non-prepacked foods which require reduced labelling or food information in line with national provisions, and establishments that make claims and/or using marketing terms.</p>	<p>Food establishments that retail a wide range of prepacked foods, or products originating from a third country and are not responsible for producing or labelling food.</p>	<p>Food establishments that retail UK labelled prepacked foods or single ingredient foods such as primary produce.</p>

Inherent risk factors	Guidance	1 Serious hazard	2 Significant hazard	3 Minor hazard	4 Low hazard	5 Very low hazard
<b>Complexity of supply chain</b>	<p>This factor considers the complexity of a food establishment's supply chain. A more complex supply chain increases the risk as there is greater potential for problems with the foods and raw materials used which could enter the supply chain. The effectiveness of product recall procedures may also be affected by this issue. Things to consider include:</p> <ul style="list-style-type: none"> <li>• Where FBO sits within the supply chain</li> <li>• Traceability records</li> <li>• Use of known and/or approved suppliers and any monitoring or checks undertaken by the FBO</li> <li>• Supply chain assurances - What is the risk of the supply chain being interrupted?</li> <li>• Any known non-compliance within food chain</li> <li>• Third country imports</li> <li>• Recognition of activities undertaken by establishment</li> </ul>	Food establishments sourcing ingredients and raw materials from multiple suppliers including importing from countries outside UK equivalent regulatory oversight.	Food establishments sourcing ingredients/products from multiple suppliers and importing from outside of the UK.	Food establishments sourcing ingredients/products from within UK.	<p>Food establishments with a limited number of known local suppliers to the business.</p> <p>Appropriate internal assurances / verifications in place.</p>	Single integrated supply chain, with appropriate evidence of supplier assurance approval checks.

Inherent risk factors	Guidance	1 Serious hazard	2 Significant hazard	3 Minor hazard	4 Low hazard	5 Very low hazard
<b>Responsible for information</b>	<p>This factor considers the level of responsibility a food business has in the communication of food information to consumers. The more responsibility a food business has, the greater the risk that there could be non-compliances, for example due to human error or the potential opportunity for misleading claims or labelling to be applied to a food.</p> <p>Consider the following:</p> <ul style="list-style-type: none"> <li>• How much control does the business have over the provision of food information, for example, is the business part of a chain with little control at a local level, or an independent business that has full control?</li> <li>• How is the information presented to the final consumer? What mechanisms are in place to ensure the accuracy of information?</li> <li>• Does the food business produce and/or amend labels? (Includes breaking down from bulk and repackaging or providing information in relation to loose food)</li> <li>• Is the food business making or applying any claims which are subject to legislative requirements?</li> </ul>	Establishments responsible for producing, labelling, and/or importing a wide range of products which are subject to product-specific legislative requirements.	<p>Establishments responsible for producing, labelling, packing and/or importing a limited range of products which are subject to product-specific legislative requirements.</p> <p>Food establishments responsible for producing or labelling products subject to general labelling requirements.</p>	<p>Establishments supplying non-prepacked or prepacked for direct sale foods.</p> <p>Catering establishments with complex menus, or menus that make claims about the food, for example fresh farmed salmon, made using fresh and organic local ingredients.</p>	Establishments that supply a range of products, but do label food, for example retail of prepacked food or catering establishments with basic menus.	Establishments supplying a limited range of prepacked food only.
<b>Potential for product harm</b>	<p>This factor considers the extent to which consumers may suffer harm.</p> <p>For consumers, this includes physical or financial harm and other forms of consumer detriment. Consideration should also be given to foods which are aimed at particular consumer groups, for example medical foods or 'free-from' foods specifically aimed at hypersensitive consumers.</p> <p>Harm to other establishments considers how the supply of non-compliant food could disadvantage legitimate establishments.</p>	<p>Establishments responsible for the composition and/or labelling of foods for targeted groups and which have a potential immediate impact on health and/or food safety.</p> <p>Consider the potential effect on targeted groups in the event of non-compliance.</p>	Establishments responsible for the composition and/or labelling of high value foods and/or where there is an enhanced risk or incentive to substitute, adulterate or contaminate the food for the purposes of fraud or market gain.	Establishments responsible for the composition and/or provision of food information which could be potentially misleading or harmful for consumers.	Establishments selling a wide range of products where they don't have responsibility for the composition of the food or the provision of food information.	Establishments selling a limited range of products which do not have responsibility for the composition of the food or the provision of food information.

**Table 2: Compliance Assessment - Guidance on the scoring system**

Assesses the FBO's performance and track record. Consideration given to how well they have complied with regulatory standards as well as consideration of historical performance and current data and inspections.

Compliance risk factors	Guidance	1 Serious non-compliance	2 Significant non-compliance	3 Broad compliance, with only minor non-compliance	4 Good compliance	5 High and sustained compliance
<p><b>Management systems &amp; procedures</b></p>	<p>This factor considers any internal/external quality management systems and assurances that are in place, and how these are implemented and verified.</p> <p>When considering this factor there is an expectation that this factor is proportionate to the size, scale and nature of the establishment.</p> <ul style="list-style-type: none"> <li>• Good understanding of processes and hazards among management and workforce</li> <li>• Any changes to activities since last visit have been reflected in the management system</li> <li>• Evidence of adequate controls in place at relevant stages of production</li> <li>• Internal assurance procedures (for example, specifications and label checks)</li> <li>• Third party assurance schemes</li> <li>• Allergen management</li> <li>• Food Safety Management</li> <li>• Training and records management</li> <li>• Primary Authority partnership</li> <li>• Recognition of good practice</li> <li>• How do they keep up to date on the risks associated with their establishment?</li> <li>• Are there internal/external audits that have taken place and if so, what were the findings?</li> <li>• Quality Assurances checks</li> <li>• If there are third party assurances is there any documentation to review?</li> </ul>	<p>No management system or procedures in place, or system not being implemented.</p> <p>Failure to identify and address risks.</p> <p>Non-compliance with systems/procedures may lead to serious repercussions/ immediate risk to consumer health.</p>	<p>Management systems not in place or inadequate for the nature, size or scale of the business.</p> <p>Evidence of system/procedures not being used where non-compliance could affect consumer health or mislead consumers.</p>	<p>Appropriate management systems and procedures in place with minor gaps.</p> <p>Systems and procedures are followed and are subject to appropriate review.</p>	<p>Good management systems and procedures in place covering the majority of risks.</p> <p>System and procedures are internally audited.</p> <p>For some establishments this could include supplier quality assurances, food traceability and food assurance schemes.</p>	<p>Effective management systems and assurance procedures in place which appropriately address risks.</p> <p>Demonstrable ongoing commitment to ensuring appropriate management controls are in place, including ongoing verification of the management control system.</p> <p>For some establishments, this may be achieved through membership of industry assurance schemes.</p>

Compliance risk factors	Guidance	1 Serious non-compliance	2 Significant non-compliance	3 Broad compliance, with only minor non-compliance	4 Good compliance	5 High and sustained compliance
<b>Allergen Information</b>	<p>This factor considers a food business's understanding and implementation of allergen controls and information requirements.</p> <p>Consider the policies and procedures in place that link the provision of allergen information to the presence of allergens as an intentional ingredient in food. Also consider the potential for the unintended presence of allergens in food and associated precautionary allergen labelling.</p> <p>Consider whether allergen management is adequately addressed within a food safety management system, taking into account the specific nature of the business. Are staff aware of the 14 regulated allergens and are they able to provide, accurate, up to date information on them?</p> <ul style="list-style-type: none"> <li>• Are pre-packed, non-prepacked and pre-packed for direct sale foods labelled in accordance with legislation?</li> <li>• Are records kept of ingredients to ensure allergen information can be passed on to customers?</li> <li>• Has a risk assessment for allergen cross-contamination been carried out?</li> <li>• Are the controls to control/prevent allergen cross contamination being implemented and are they adequate? Do they match the risk assessment?</li> <li>• Does the business use Precautionary Allergen Labelling based on the findings of a risk assessment?</li> <li>• Are procedures in place to ensure any product/ingredient changes are accurately recorded and reflected in allergen information?</li> <li>• Is accurate allergen information provided to consumers?</li> <li>• Is there a procedure for ensuring allergen information is kept up to date? How are staff updated?</li> <li>• For establishments who do not take physical ownership of food, how do they ensure allergen information requirements are complied with?</li> <li>• If food is delivered, how do they ensure that allergen information is passed to consumers?</li> </ul>	<p>Poor understanding and implementation of allergen controls, labelling and information requirements that are relevant to the food establishments activities.</p> <p>No allergen controls, policies or procedures in place, or systems are not effectively implemented.</p> <p>Presence of undeclared/ unintended allergens that could pose a risk to consumers.</p>	<p>Insufficient understanding around allergen controls, labelling and information requirements. and measures to be taken to mitigate these to safeguard consumers.</p> <p>Evidence of non-compliance resulting in concerns around potential risk posed to consumers.</p>	<p>FBO demonstrates satisfactory understanding and implementation of allergen controls and labelling and information requirements.</p> <p>No non-compliances which result in concerns around potential risk to consumers.</p>	<p>Evidence of good understanding of allergen controls and labelling and information requirements which is supported by appropriate policies and procedures.</p> <p>No non-compliances which result in concerns around potential risk to consumers.</p>	<p>FBO demonstrates thorough understanding and implementation of allergen controls and labelling and information requirements.</p> <p>System of allergen controls in place that is specific to the nature of the business and FBO is able to demonstrate all necessary steps to manage allergens are taken.</p> <p>Proactive approach to allergen issues and regular monitoring to ensure continued effectiveness of controls.</p> <p>No non-compliances which result in concerns around potential risk to consumers.</p>

Compliance risk factors	Guidance	1 Serious non-compliance	2 Significant non-compliance	3 Broad compliance, with only minor non-compliance	4 Good compliance	5 High and sustained compliance
<b>Current compliance level</b>	<p>This factor considers the level of compliance observed based on the official control that is being undertaken and/or any complaints or intelligence received about the business.</p> <p>Consider the following:</p> <ul style="list-style-type: none"> <li>• Have issues found during the previous inspection been resolved?</li> <li>• Assurance – consider what advice has been sought?</li> <li>• Levels of compliance with other areas of legislation not related to food standards, for example food hygiene or fair-trading issues</li> </ul>	General failure to comply with statutory obligations including safety critical matters or matters that involve deliberate deception for financial or market gain.	Significant non-compliances with statutory obligations relating to technical non-compliance matters.	Satisfactory level of compliance. Minor technical (non-safety critical) non-compliances only.	Good level of compliance with statutory obligations.  Any non-compliances found are minor in nature.	High level of compliance with statutory obligations



Compliance risk factors	Guidance	1 Serious non-compliance	2 Significant non-compliance	3 Broad compliance, with only minor non-compliance	4 Good compliance	5 High and sustained compliance
<b>Confidence in management (CIM)</b>	<p>This factor considers the actual risk of whether an establishment will be compliant with food law, taking into account the ability of the FBO to understand and effectively mitigate risks.</p> <p>An establishment that has effective management systems in place will effectively control the inherent risks, and this should be recognised.</p> <p>The attitude and behaviour of the FBO in response to any non-compliances and their willingness to rectify problems is another key indicator of what confidence officers can have in an establishment.</p> <p>Consider the following:</p> <ul style="list-style-type: none"> <li>• Staff training records</li> <li>• Traceability records/capability</li> <li>• In-house checks</li> <li>• Audit arrangements</li> <li>• Previous compliance history and complaint management</li> <li>• Confidence in staff –knowledge and experience.</li> <li>• Incident management</li> <li>• Attitude/willingness to engage, achieve compliance and rectify problems</li> <li>• Willingness to share information with the competent authority</li> <li>• Have there been any recalls or enforcement action, or has intelligence been received regarding the establishment?</li> <li>• Due diligence systems</li> <li>• Resilience and contingency plans</li> <li>• Allergen management policies and procedures</li> </ul> <p>Does the establishment have a complaints handling procedure in place? Do they carry out trend analysis and how is this reviewed and addressed?</p>	<p>Poor track record of compliance. Little or no technical knowledge.</p> <p>No appreciation of hazards/no quality control.</p> <p>Lack of awareness of relevant food law and associated controls.</p> <p>No staff training/supervision.</p> <p>Evidence of previous formal enforcement action.</p> <p>Disproportionate number of justified complaints since last inspection.</p> <p>Unwillingness to act on advice or enforcement action.</p> <p>Unreactive approach to dealing with any non-compliance, resulting in immediate risk to consumers or could give rise to potentially fraudulent actions/activities.</p>	<p>Varying record of compliance. Staff training / supervision is inadequate.</p> <p>Poor understanding of relevant food law and necessary controls.</p> <p>Significant number of justified complaints.</p> <p>Reluctance to engage.</p> <p>Slow to respond to and rectify any non-compliances in a timely manner, resulting in the potential for consumers to be misinformed.</p>	<p>Satisfactory record of compliance.</p> <p>History of minor non-compliance only.</p> <p>Staff can demonstrate a basic understanding of relevant food law and necessary controls.</p> <p>Complaint levels do not cause concern either due to volume or nature.</p> <p>Good attitude to compliance but may struggle to implement and maintain legal requirements and may rely on LA support.</p>	<p>Good record of compliance.</p> <p>Staff can demonstrate good awareness of relevant food law and necessary controls.</p> <p>Low level of complaints not of a serious nature. Fully engaged with a good attitude towards compliance.</p>	<p>Excellent record of full and continued compliance.</p> <p>Internal/external technical advice available.</p> <p>Minor complaints with evidence of a proactive approach to handling and reviewing complaints.</p> <p>Evidence of a proactive approach / attitude.</p> <p>Fully engaged, understands law and responsibility to ensure compliance.</p> <p>Full appreciation of the risks associated with the business.</p>

## Decision Matrix

The decision matrix determines the frequency of official controls that each establishment must be subject to.

The individual risk factor scores for Inherent Risk Profile and Compliance Assessment are averaged and rounded up or down to the nearest whole number to produce a single overall score for each risk category.

Before applying these two scores to the decision matrix, the following rule must be considered. The rule is to provide assurance in relation to poor performing establishments and ensure they are prioritised in the decision matrix due to the higher risk they present:

Table: Scenario rule

Scenario	Rule
An establishment with one or more serious non-compliance score (score of 1) under the Compliance Assessment risk category	Overall Compliance Assessment score of 1 given regardless of the other compliance scores.

The two final scores must then be plotted on to the decision matrix to determine the minimum frequency at which official controls must be carried out.

Table: Decision Matrix

Inherent Risk Profile	5	12 Months	24 Months	60 Months	72 Months	120 Months
	4	Priority Intervention 6 Months	12 Months	36 Months	48 Months	72 Months
	3	Priority Intervention 6 Months	12 Months	24 Months	36 Months	60 Months
	2	Priority Intervention 3 Months	Priority Intervention 6 Months	12 Months	24 Months	36 Months
	1	Priority Intervention 1 Month	Priority Intervention 3 Months	Priority Intervention 6 Months	12 Months	24 Months
		1	2	3	4	5
		Compliance Assessment				

Competent Authorities can use any of the methods and techniques of official controls as long as they are effective and appropriate in the circumstances. This includes the option for interventions to be carried out remotely in all establishments other than those subject to priority intervention.

The overarching principle is to ensure that the most effective official control activity is chosen and that the Officer is satisfied that through either a single method, or a combination of methods and techniques, compliance with food law can be verified.