

Ensuring a fair and consistent approach

- Consistency within the Food Team:
 - make sure there is a consistency framework in place
 - make sure this covers monitoring of application of the Brand Standard
 - make sure this covers training and participation in consistency exercises
 - consider running a Team briefing on the Brand Standard as a reminder of what it requires.
- Consistency through Food Liaison Groups (FLGs):
 - include FHRs as a standing agenda item or set up an FHRs sub-group
 - compare ratings profiles on a quarterly basis to identify areas for further consideration or potential inconsistencies
 - compare number of appeals/requested revisits and right to reply requests on a quarterly basis and share any useful lessons learned
 - compare status type distribution on a quarterly basis to identify any significant variations within the group that could indicate differences in application of status type
 - discuss difficult scoping questions making reference to the Brand Standard
- Consistent scope:
 - if a premises isn't registered as a food business, then don't register just for FHRs
 - if it is registered, and supplies food direct to consumers, consider whether the public would think of it as a food business or not (e.g. is food only a small element of wider business activities) and what risk is there to public health (is it very low?)
 - use professional judgement and take account of local circumstances and conditions
- Consistent scoring:
 - take account of the basic principles for applying Annex 5 of the *Food Law Code of Practice* ('officers should use the full range of scores', and establishments that fall into more than one scoring category for a scoring factor should be allocated the highest score of those that are applicable')
 - take account of the guidance on control of cross-contamination
 - regularly review and discuss cases at Food Team meetings (e.g. cases where scores vary significantly across hygiene, structure and confidence in management or where patterns of scoring by individuals may suggest an overly cautious or liberal approach)
 - ensure officers participating in the FSA Annex 5 consistency training and other relevant training (e.g. the control of cross contamination course) cascade the learning
 - where the business has a Primary Authority agreement, make sure the Primary Authority inspection plan is taken into account
- Consistent messages for businesses:
 - use the template inspection form in the Brand Standard or make sure the one used presents required improvements under the three Annex 5 headings
 - use the FSA template letters for notifying ratings and template letters and forms for dealing with safeguards or make sure yours include the same type of information



- Consistent website messages:
 - check for and remove any references and links to previous rating schemes, e.g. to ‘star ratings’ and ‘scores on the doors’
 - include information on businesses safeguards with links to relevant forms
 - Include information for businesses on how to improve ratings
- Consistent data:
 - check records on your database each time a new rating is given to ensure the LAEMS category is correct (see examples/definitions of establishments provided in the guidance at <http://www.food.gov.uk/enforcement/monitoring/laems/generalinfo/>)
 - check status tags are correct (childminders should always have a ‘sensitive’ status)
 - check that the business name is still correct and that the address details are up to date and the full postcode is included
- Accurate data:
 - upload data as regularly as possible but at least every 27 days.
 - if notified of possible errors on business details by Scores on the Doors, only make appropriate amendments to your own database system
- Fair safeguards:
 - for appeals, consider agreeing arrangements with neighbouring authorities so that the decision on the appeal has a further degree of independence and that there is capacity to meet the response times during holidays and other absences