

Consumer Focus Wales response to the Food Standard Agency Wales consultation on a Local Authority Audit Rating Scheme

January 2012

About us

Consumer Focus Wales is the independent statutory organisation campaigning for a fair deal for consumers. We are the voice of the consumer and work to secure a fair deal on their behalf. In campaigning on behalf of consumers we aim to influence change and shape policy to better reflect their needs. We do this in an informed way owing to the evidence we gather through research and our unique knowledge of consumer issues. We have a duty to be the voice of vulnerable consumers, particularly those on low incomes, people with disabilities, people living in rural areas and older people. In addition, we also seek to identify where other consumers may be disproportionately disadvantaged by a particular consumer issue or policy.

Overview

Consumer Focus Wales welcomes the opportunity to comment on this consultation. We are responding to this consultation from a consumer perspective, therefore given the technical nature of questions within this consultation, rather than answer the questions specifically; we have instead provided a summary of our key points on this occasion. This written response follows a meeting with the Food Standards Agency Wales (FSA Wales) where we have also shared our comments verbally.

In summary, Consumer Focus Wales welcomes the proposal to introduce a rolling programme of audits and a system of ratings these audits for local authorities related to their food and animal feed law enforcement responsibilities. However as we note below we feel that for this scheme to work for consumers there are some key issues that need to be considered. Namely, we would recommend instead of the proposed four tier A-D rating system, that a 0-5 approach is taken to remain consistent with the FSA's existing Food Hygiene Ratings Scheme (FHRS). We also feel that providing 3 separate scores for food safety, food standards and animal feed would be clearer for consumers and that a short summary of the findings of any audit should be provided alongside these scores. We would also strongly recommend that FSA Wales undertakes consultation and testing with consumers directly before beginning a pilot of the new scheme. Our full response is detailed below.

Our response

We welcome the proposal by FSA Wales to introduce a rolling programme of audits of food and animal feed enforcement. We believe this ongoing standardised monitoring will provide a focus for local authority effectiveness in delivering their responsibilities in these areas. We also believe it will provide an opportunity to identify where local authorities are doing well in

enforcement and identify areas for improvement, as well as provide a measure between and across different local authorities in Wales. We feel this has the potential to ensure that local authorities are able quantify their effectiveness in delivery of their responsibilities around food and animal feed enforcement and importantly receive recognition where they are doing well, as well as importantly, to drive up standards where authorities are not delivering as is expected.

We also support the principal of introducing a system of ratings for local authorities to describe in an accessible way the results of any audit of a local authority's performance on food and animal feed enforcement. We believe this is consistent with the FSA's principals' of transparency and would be welcomed by consumers.

The format of the rating scheme

The consultation proposes that there will be four tier ratings, from A-D, with A being for very good overall performance and D being for significant failures.

Following the launch of the FSA's Food Hygiene Ratings Scheme (FHRS) and our work to raise greater awareness of food hygiene as a result of our monitoring of progress of key agencies to implement Professor Pennington's recommendations¹ we would note that consumers in Wales have a greater awareness and interest in the issue of food safety and food hygiene more broadly.

The development of the Food Hygiene Ratings Scheme has been a big step forward in communicating complex information to consumers in a more simple, easy to understand way through a ratings system of 0 to 5. The FSA and ourselves have done much to try and raise greater awareness of the scheme. In our recent survey of consumers we found that 50 per cent of people in Wales have now seen or heard about the Food Hygiene Ratings Scheme or Scores on the Doors which awards stars to food businesses according to hygiene levels, which highlights the impact of this promotional work. The Welsh Government's proposals to make the display of food hygiene ratings by food businesses mandatory will only raise awareness still further, which is to be celebrated. However this will mean that when consumers think about food hygiene issues they will associate this with the 0-5 tier star scoring system.

We would strongly recommend therefore that to avoid confusion for consumers, FSA Wales should consider replacing the suggested A-D ratings scheme with a 0-5 star rating scheme in order to maintain consistency and allow for easier communication with and recall by consumers who have already become aware and are becoming used to a 0-5 rating system for issues related to food enforcement.

The ratings

Whilst we have no specific comments to make on the detail of how ratings are to be arrived at in terms of technical make up, as this is more appropriate for local authorities and others to comment on, we do have comments on how these are presented. The current proposal is

¹ following the 2005 inquiry into the outbreak of E.coli O157 in 2005

that one rating will be arrived at which brings together results of an audit across 3 key areas of service delivery, these being: food hygiene, food standards and animal feed.

As noted above, we know that consumers have developed a greater awareness and interest in food hygiene over the past few years and would be particularly interested in understanding how local authorities are performing in this area. This is supported by research we have undertaken with consumers to better understand their perceptions of local regulatory services in Wales, where consumers had strong views about food hygiene issues.² Clearly also there will be particular interest groups who will also have specific interests in knowing more about local authorities performance in the area of food standards and animal feed also. For example in our research on regulatory services, we found in discussing related issues of animal health and welfare with different groups of consumers across Wales only one group, that of participants living a rural area had an real interest in this issue, but of course where they were interested, they were very engaged.

In addition of course, it may be argued that a local authority could be particularly good at food hygiene enforcement activity and have a strong record in this, however it's animal feed service delivery could have areas identified as needing urgent improvement, therefore the resulting rating would have to account for both aspects, which could be argued to be confusing if a consumer or stakeholder wanted to ascertain how well a local authority was doing in delivering it's responsibilities on food hygiene or animal feed specifically.

For the reasons outlined above then, we could strongly suggest that FSA Wales considers providing 3 ratings for each audit, one for food hygiene, one for food standards and another for animal feed. This would have the benefit of providing a clear position on the local authorities' performance in each service area, which would be of benefit to both consumers and the local authority themselves.

Effectively communicating and explaining a rating

Once again drawing on our experience of the FHRS (whose UK Steering Group we also sit on) we would highlight the difficulty in just providing a rating alone, with no explanation of the reasons behind this. Whilst the FHRS is accessible in the way the rating is displayed, we know that consumers would like to have access to further information about the reasons behind a poor score. We appreciate that the FSA already makes it audit reports of local authorities and other agencies available online and we welcome this. We would suggest however that firstly the FSA should consider reviewing these audit reports for their accessibility for consumers and other stakeholders who have an interest in these. We would be happy to help undertake this work if required.

In addition, we would suggest that FSA Wales should consider providing a short summary of the key aspects of each specific audit for this to be displayed alongside the rating for the local authority. This should include specific reasons why the rating was given to that authority and what action needs to be taken to improve. This should be almost an accessible exec summary of the audit report. Then if people required further information they could access the full audit report.

² We undertook focus group research for the Local Better Regulation Office (LBRO) on the issue of Welsh Consumers and regulatory services, unpublished, March 2011

Displaying and accessing ratings

The consultation does not give any detail on how FSA Wales proposes that audit ratings will be displayed, therefore we would recommend further consideration should be given to this issue. It is possible that this scheme could be attached to the existing FHRS site in some way, or certainly have the same look and feel about it. In addition, consideration should also be given to how consumers and other stakeholders who do not have access to the internet could access this information.

Engaging and consulting with consumers

Finally, we would strongly suggest that FSA Wales would benefit from understanding consultation and testing directly with consumers about the look and feel of the ratings scheme before starting the pilot phase of this work. Whilst we appreciate that an evaluation will be undertaken after any pilot, it would be preferable to involve and test the chosen model or options for models with consumers ahead of the pilot in order that the scheme -that is being developed with consumers and other key stakeholders in mind- will meet their needs and be utilised by them. This is preferable and a more effective use of resources than needing to change something significant at a later stage as it is identified as an issue for consumers as the scheme is piloted. We would be happy to support FSA Wales to undertake this work.

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