Using Systems Thinking to Redesign Food Inspection Work

Great Yarmouth Borough Council

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Summary

Using systems thinking, Great Yarmouth Borough Council has redesigned its food inspection work around the purpose of ensuring that food is safe for public consumption, by focusing on making food businesses safe.

This has significantly increased contact time between officers and business, and enabled a new regulatory culture based around trusting relationships and tools to help make businesses safe. Early indications are showing better outcomes in terms of compliance.

Key lessons from the project include the benefits of early engagement with the Food Standards Agency to ensure the new service design works within the Code of Practice and the willingness of the national regulator to support innovation and new approaches which improve official controls and local food safety.

Background

Great Yarmouth had a critical Food Standards Agency audit arising from a backlog of high risk inspections, which it generally sought to reduce through consultancy support.

Following four years' close support from the Agency, the Council secured funding from the Local Strategic Partnership for consultancy support for a systems thinking intervention, an approach strongly supported by the Council Chief Executive. This started in September 2009 in housing and extended to food in March 2010.

The food intervention intended to make the food inspection service more capable within its existing resources (2 managers, 2 EHOs, 3 technical officers covering 1,400 food businesses).
The first stage of a systems thinking intervention involves a phase known as ‘check’ during which there is a consideration of the purpose of the service from the customer’s perspective and an assessment of demand against that purpose, analysing how much of that demand is value demand and how much is failure demand from the customer’s perspective.

The team undertaking check spent a lot of time considering who the customer was for a food inspection. Having considered citizens, business, legislation and the Food Standards Agency, the team eventually concluded that while consumers were major beneficiaries of the food team, business was the primary customer of food inspection work.

During check, the team spoke to over 40 businesses, visiting a wide variety of business types. The diverse sample of businesses gave a consistent set of messages, whether compliance was good or bad:

- they wanted the food team there and more contact with them;
- they wanted the opportunity to show the inspectors what they had done since the last inspection and how they had addressed any shortcomings raised;
- they did not want to harm people; and
- new businesses really wanted contact before they opened.

Check showed that:

- the service had become good at prosecution and formal enforcement but was less effective with non-broadly compliant businesses;
- repeated letters were sent to the same business year on year without achieving any sustainable improvement in compliance; they questioned the impact of providing a list of tasks, often long and without any clear sense of priorities for the business;
- they did little follow-up work because of the backlog of inspections and inspection targets set for officers, leading to a focus on inputs rather than outcomes; and
- they did not actively invest time in new businesses as to register and work with them could make it more difficult to achieve inspection targets: check showed that several businesses had not been inspected in the first two years after opening.

They identified waste arising from dual IT systems (document management and database) and numerous steps and handoffs at each stage of the process. At the end of the check process, the team developed a new purpose which was very different from the previous purpose:

**Old purpose:** Achieve my inspection targets each month  
**New purpose:** Ensure food is safe for public consumption
Plan / Experimentation

Following check, systems thinking involves a period of planning and experimentation to develop the new process and flow. Systems thinking involves total redesign of a service starting with a blank sheet of paper rather than trying to change and improve within the confines of the existing system/process. The team tried numerous things during plan, sharing the results regularly and changing the redesigned system as they went along.

The plan phase used a set of ‘guiding principles' to change thinking, one of the key principles being that everything would be done based on data and knowledge.

Redesigned System

Following check, the team redesigned the food inspection process around the revised purpose of making food safe. It was rolled out in June 2010.

The redesigned system was based around making food safe, which meant that once a business was assessed as being unsafe, the team would not leave the business until it had worked with the business using a range of ‘make safe tools', which is developing continuously, to address the root causes. The team tailors the selection of make safe tools to the business and the specific barriers to providing safe food. This approach was intended to provide focus, support and clarity about priorities for the business owner with a view to longer-term, more sustainable improvements in food safety in Great Yarmouth. The team has found that as a consequence of the focus on food safety, there have been improvements in overall compliance levels.

Officers are free to spend as long as they like with the business during the ‘make safe’ stage which is one of the biggest and most profound changes arising from the redesigned system. This enables the service to absorb variation much more effectively than the previous system which was designed around a certain time target for each inspection/intervention and a focus on inputs rather than longer-term outcomes.

Enforcement remains part of the team’s approach where necessary. The team hand businesses a visit report while they are in the business. The back of the report contains a summary of relevant legislation and the associated requirements.
The Food Standards Agency Code of Practice remains central to the approach and focus when taking enforcement action. The key is that the system is designed to make businesses safe which has significantly reduced the amount of time required for enforcement.

The team is trying to develop better links with and awareness of other business-facing council services to enable them to signpost and support business more holistically and coherently. There has been a huge culture change as a result of the redesigned service, especially in terms of a very different, trusting relationship between the food team and the business, with businesses ringing in far more frequently and asking for help. The Food Standards Agency is interested in the culture change and a more formal examination of the Great Yarmouth experience is likely to be included within research which is about to be commissioned on regulatory cultures and behaviours in the enforcement community.

In the past, officers probably spent 50% of time in the office and 50% in the field, whereas now the ratio is more like 15% office and 85% in the field. They write far fewer letters, leaving handwritten inspection reports with the business unless it specifically asks for a letter, and follow up to ensure priority actions have been taken forward.

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<tr>
<th>Example Assessment Tools</th>
<th>Examples of some of the ‘Make Safe’ tools used in Great Yarmouth</th>
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<tbody>
<tr>
<td>full assessment</td>
<td>demonstrations, for example hand washing/cleaning</td>
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<tr>
<td>verification check</td>
<td>tailored training, including with an interpreter</td>
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<tr>
<td>sampling assessment</td>
<td>sampling</td>
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<tr>
<td>school catering assessment</td>
<td>supporting business use of HACCP</td>
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<td></td>
<td>asking the owner to do something while the inspector is there so that the inspector can observe and show them how to remedy any areas for improvement</td>
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<td></td>
<td>cross-contamination demonstrations</td>
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<td>using photographs showing expected standards</td>
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<td>it is worth noting that in line with the authority’s enforcement policy, where necessary enforcement is still used by the team where a business will not engage</td>
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Engagement with Food Standards Agency

Positive engagement with the Food Standards Agency has been central to the development of the new approach in Great Yarmouth and to ensure it works within the Code of Practice. The team contacted the Food Standards Agency who visited, looked at the redesigned system, and agreed that a pilot approach to further develop the new system would be useful pending evaluation. Early engagement with the Agency really paid off and the team found that their previous perception of what the Agency required was not matched by the reality. The old perceptions limited the scope the team thought they had to simplify and improve the delivery of food inspections, and demonstrated the value of greater engagement with the national regulator.