

Progress of 'Scores on Doors' (Food Hygiene Rating Scheme) in NSW

Increasing its effectiveness for the future

Review summary – June 2013

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Executive summary

The NSW Food Authority (the Authority) in conjunction with 26 local councils rolled out a year-long voluntary trial of a food hygiene rating scheme (the 'Scores on Doors' scheme) from 1 August 2011. Under the Scores on Doors trial program, participating food retail and food service outlets are assigned a star rating dependent upon their level of performance. These food outlets include restaurants, takeaways, cafes, pubs, hotels, clubs and bakeries.

The twelve-month trial followed a six-month pilot held in 2010 across 20 different local council areas that represented a mix of large and small, metropolitan and regional businesses.

After trialling the improved Scores on Doors program for twelve months, participating councils and businesses believe that the program has helped improve hygiene standards. This is supported by the Authority's research into international food hygiene ratings schemes which have proven to improve food safety compliance in food businesses.

The standardised food inspection checklist known as the Food Premises Assessment Report (FPAR) is the cornerstone of the Scores and Doors program and has improved the consistency and interpretation of food inspections.

It was however identified that public awareness of the scheme is limited, business participation was low, businesses understanding of the scheme and its purpose is mixed, and promotion has been variable. These limitations on uptake are in part due to its voluntary nature and reluctance by business to display 'low' ratings.

Schemes which provide information about poor food safety performance are needed within any package of initiatives designed to bring balanced approach to improving food safety. In NSW the Name and Shame Register continues to provide this valuable information to the public, however refinements may be considered.

Food hygiene rating systems operating internationally are either mandatory or heading towards a mandatory approach and there is robust evidence that these systems have a positive impact on food safety compliance. In some instances a reduction in reported foodborne illness has also been demonstrated coinciding with the introduction of mandatory food hygiene rating systems. Most international schemes include websites and mobile phone 'apps' built into their Scores on Doors scheme which effectively disseminates public information about food safety inspection scores.

The Authority considers that mandatory requirements for food hygiene rating systems are arguably the most effective and straightforward way of ensuring that consumers have access to information about the food hygiene standards of food businesses in NSW. However it remains to be determined whether a mandatory scheme should require food hygiene ratings to be displayed at food establishments where they can be seen easily by consumers, or simply require local councils to utilise a standardised inspection assessment report and rating system.

Background of Scores on Doors in NSW

The pilot and trial of Scores on Doors has been one element in a suite of measures aimed at reducing foodborne illness, which includes mandatory food inspections under the Food Regulation Partnership and other initiatives such as the Food Safety Supervisor requirements, Name and Shame, the Egg Food Safety Scheme and publishing local government activity reports.

In NSW, consumers largely rely on local council Environmental Health Officers (EHOs) to regulate and inspect food retail and food service businesses in order to ensure that food safety standards, including those mandatory requirements relating to hygiene, are met. There has however been a growing consumer demand seeking information on the level of hygiene compliance in a food business. There is also a demand for transparency, consistency and accountability across all levels of government from industry, media and consumer advocates.

A variety of disclosure systems have emerged both domestically and internationally aimed at informing consumers about food safety performance in the food retail and foodservice sector. There are two main approaches. Compliance information schemes, such as scores on doors, provide consumers with information (or some assessment) about how the food safety standard of each business compares with prescribed standards. Full compliance achieves the top score/ranking. These aim to improve compliance with existing statutory requirements. Hygiene award schemes provide consumers with information (or some assessment) about the food safety standard of those businesses that exceed prescribed standards. Full compliance is usually the entry level requirement.

The need to ensure consistency was a key driver for the development of the NSW scheme. Allowing different systems to proliferate would create inefficiencies for regulators and confusion for consumers.

When the Authority first moved toward implementing the scores on doors scheme in 2010, there were already two systems operating in Sydney. Manly Council had a voluntary ten-step compliance information scheme, however has since adopted the star display and rating system designed by the Authority. Canada Bay Council launched a voluntary hygiene award system which scores businesses from 3–5 stars, with the 4–5 stars rating given for performance of best practice in addition to compliance with the Food Standards Code.

Foodborne illness in the foodservice and retail sectors

Recent information on foodborne illness reinforces the importance of the food service sector in preventing foodborne illness. Restaurants and takeaway businesses top the list of common settings associated with foodborne illness, accounting for around 36% and 11% of incidents respectively (OzFoodNet 2001–2011). Bakeries also report major outbreaks at times, usually associated with the use of temperature-abused raw egg mayonnaise. The available information suggests that cross-contamination and temperature control programs in food service businesses remain high priority areas for intervention. Food handlers with gastroenteritis also remain an issue.

Number affected in NSW: main agents and main settings (OzFoodNet 2001–2011)

Setting	Salmonella	Norovirus	C. perfringens	Unknown
Restaurant	491	313	97	994
Takeaway	380	43	86	119
Caterer	15		117	297
Bakery	479			15
Home	224	6		91

It should be noted that estimates of actual foodborne illness events far exceed the numbers of notified illnesses and those reported following outbreak investigations. This is attributable to factors such as under-reporting and under-diagnosis. It has been estimated that for milder illnesses only about 1 in 25 cases is reported and only 1 in 30 cases is diagnosed (up to 1 in 140 for some illness).

Following the 2002 National Risk Validation Project, a number of high risk industry sectors were required to implement the food safety program requirements of Standard 3.2.1. While eating establishments were in the highest risk group, the cost of mandatory food safety programs in this sector was considered to be prohibitive. Therefore, as indicated above, in addition to the routine inspection program, a range of complementary measures are being utilised in the retail and food service sectors.

Model development and pilot study

In April 2010, State and Local Government jointly announced the Scores on Doors initiative. The initiative was piloted between July and December 2010 using a model developed over the preceding eighteen months, with a view to state-wide introduction of an agreed scheme (on a voluntary basis) from July 2011.

As the NSW Food Authority is responsible for enforcing compliance with the Food Standards Code and *Food Act* 2003 (Food Act), an early decision was taken that any system should be limited to compliance information rather than extending over and above the Authority's remit.

The Scores on Doors scheme in NSW assesses participating food businesses against food safety legislation with particular emphasis on those food handling practices known to be linked to foodborne illness. This assessment, using a standardised checklist and scoring scheme, generates a grade which is designed to be displayed in a prominent location within the premises allowing consumers to make informed choices about the places where they eat out or from which they purchase food thereby encouraging businesses to maintain and improve their hygiene standards.

Importantly, the need for consistency and coordination across the 152 local councils was crucial to the development and successful implementation of a NSW scores on doors scheme. With this objective in mind, the Food Regulation Forum commenced work to improve consistency and enhance public understanding of food regulatory inspections and outcomes. An information package was prepared which included a standardised inspection checklist (Food Premises Assessment Report (FPAR)) and guidelines for use by all council EHOs.

Uptake of the FPAR by councils would also help to ensure that there is consistency of inspections and interpretation of the relevant food regulatory standards, i.e. the Food Standards Code and would form the basis of the NSW Scores on Doors scheme.

Eligible food service businesses

Scores on Doors is aimed at food service businesses that process and sell food that is ready-to-eat, intended for immediate consumption and potentially hazardous, which means it may require special handling to be safe, such as temperature control. These businesses include restaurants, takeaways, cafes, bakeries and bistros.

This is a similar group of businesses to those which are required to appoint a Food Safety Supervisor and there are estimated to be approximately 30,000 eligible businesses across all local government areas.

Scores on Doors is not intended for supermarkets, delicatessens, low risk food businesses and businesses which are licensed by the Food Authority.

Evaluation of the pilot study proves scheme to be successful

The Scores on Doors pilot study involved 20 local councils and 266 food businesses across New South Wales. It provided an opportunity to test the scheme and take account of stakeholder views. This included food businesses and councils that participated in the trial, food retail and foodservice industry peak associations and consumers. A final evaluation report was released in March 2011.

There was positive support for the scheme from food businesses and associations, councils and consumers. The report recommendations were adopted with a revised scheme trialled state-wide, on a voluntary basis, from August 2011 for twelve months.

State-wide voluntary trial commences in 2011

In August 2011, a voluntary trial of the Scores on Doors program was initiated across the state. Under the trial, participating retail food outlets are assigned a star rating dependent upon their level of performance. Top rating businesses receive a five star rating, with four and three stars also awarded to businesses that perform well and comply with the requirements of the Food Standards Code. Accompanying the stars is a positive word descriptor used as a further incentive for food businesses.

The intent of the state wide voluntary trial was to enable the scheme to be fine-tuned, and improve its effectiveness going forward. This included: improving consumer awareness and understanding of food safety information; testing the assumption that consumer demand would drive business uptake of the system; making businesses and councils more familiar with the scheme; and exposing the public to its benefits.

The voluntary trial focused on encouraging and bringing councils and food businesses into the initiative so that a critical mass could be established on which to base a full scale pilot and develop an evidence base to inform further work. Consumer awareness has relied upon limited promotion of Scores on Doors by councils using local media, council newsletters and local promotions.

The Scores on Doors system allows the public to view a scorecard in the form of a certificate (pictured below) which rates a food business's compliance with the food safety and hygiene requirements. The certificate is issued by council following a routine food inspection by their

EHO and is positioned in a place highly visible to consumers, usually in the business front window or on the front door.



The scoring system is based on the accrual of points (effectively demerits) where food safety issues are identified. Therefore, the lower the points accrued, the higher the facility's rating will be. The points accrual relevant to each rating, and the rating's meaning are explained in the table below.

Points	Rating	Definition
0–3	★★★★★ Excellent	The business has achieved the top grade means which means that it achieved the highest level of compliance with food safety standards.
4–8	★★★★ Very good	The business has in place very good food safety practices. Some minor areas where standards were not met will need to be addressed.
9–15	★★★ Good	The business has a good standard of food safety. A number of areas, although not serious, need to be corrected.

In NSW 26 councils and more than 800 businesses participated in the Scores on Doors program coordinated by the Authority. One council (Canada Bay) operates its own unique star rating system.

The formal trial period formally finished in August 2012 however participating councils have been encouraged to continue to use the Scores on Doors system. A recent survey undertaken by the Authority of the councils that participated in the trial indicates that all of the responding councils (18) intend to continue to use the existing Scores on Doors system.

NSW experience of Scores on Doors program to date

The Scores on Doors program provides consumers in NSW with point of sale information indicating how well foodservice businesses comply with food hygiene standards during inspections. In general terms, the aim is to improve food hygiene compliance in those businesses and as a result reduce foodborne illness in NSW.

Specifically the objectives of the Scores on Doors program are to reduce foodborne illness by:

1. Improving compliance with food safety requirements,
2. Improving consistency and transparency in the conduct of food safety inspections, and
3. Providing consumers with useful, consistent information about food safety performance in the food retail and food service sector so that they can make informed choices.

The Authority has reviewed the results of the Scores on Doors trial against these objectives and the outcomes are summarised in this document. Based on this review the Authority considers there to be benefits from the program for businesses, councils, consumers and the community at large.

Irrespective of the type of system, the design, implementation and uptake will be influenced by whether the system is voluntary or mandatory in nature. In this context, voluntary means that there is no legislative underpinning for the system itself, although it may be developed by a regulatory agency to support its objectives. At the other end of the spectrum, mandatory systems are fully legislated, with all aspects of the system being prescribed in either legislation or underlying regulations. There are potentially numerous variations of these two extremes, with some elements being prescribed and others being adopted on an “opt in” basis.

In October 2012, an online survey was sent to councils (n=26) and a paper-based survey to businesses (n=812) who participated in the trial to gather their thoughts on the trial to date. Responses were received from 69% (n=18) of councils and 24% (n=196) of businesses that participated. Results from this survey are discussed in further detail throughout the report.

Objective 1: Improve compliance with food safety requirements

The NSW Scores on Doors scheme is designed to allow consumers to make informed choices about the places where they eat out or from which they purchase food thereby encouraging businesses to maintain and improve their hygiene standards. Establishing any direct causal relationship between inspection disclosure schemes and a reduction in foodborne illness is challenging as inspection disclosure systems often exist with other schemes also aimed at reducing foodborne illness in this sector. There is limited data in Australia demonstrating a reduction in foodborne illness, although in Brisbane complaints data over the last five years (2007–2012) has shown a decrease in the number of complaints related to unsafe food and foodborne illness after the program was introduced in 2010. Experience in New York and Toronto has clearly demonstrated that effective inspection disclosure is a factor in reduction of foodborne illness in the restaurant and café sectors.

Public disclosure, food safety schemes are generally aimed at protecting public health, by assisting and encouraging food businesses to reach high levels of compliance with food safety regulation, thus ensuring safe and hygienic food handling practices. Additionally, they aim to provide consumers with information about how clean and safe food businesses are, to assist

them in making choices about where to dine out and purchase takeaway food. The rationale is that consumer demand drives competition and creates the mechanism for food businesses to strive to achieve high standards, and in doing so, increases patronage.¹

Councils and businesses believe it has helped improve hygiene standards

There has been business support for a Scores on Doors system since the pilot was undertaken in 2010. At this time, 82% of businesses who participated in the Scores on Doors scheme believed it would help to raise awareness of food safety standards within their business and be a positive reinforcement for staff attitude and behaviour.

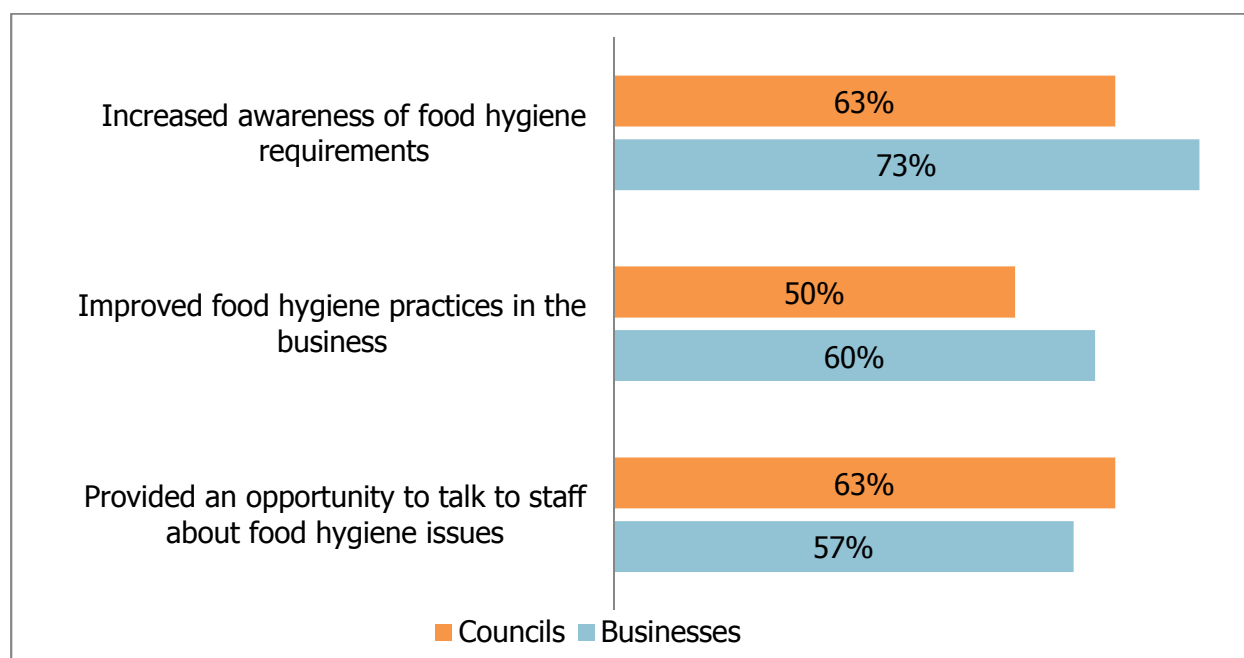
After trialling the improved Scores on Doors system for twelve months, both councils and businesses who participated believe that Scores on Doors has helped improve hygiene standards.

Two-thirds (63%) of councils and three-quarters (73%) of businesses participating in the trial believe that Scores on Doors increases a business's awareness of food hygiene requirements.

Half of councils and 60% of businesses also believe that Scores on Doors improves hygiene practices in food businesses. Over half of the businesses and councils also believe that the system provides an opportunity for managers to talk to staff about food hygiene. See Figure 1.

While there is a strong belief that Scores on Doors has benefits, it must be acknowledged that businesses and councils currently participating have voluntarily chosen to participate and generally support the scheme, therefore these results may not be reflective of all stakeholders.

Figure 1. Perceived benefits of Scores on Doors



¹ Parliament of South Australia (September 2012) Inquiry into Food Safety Programs – Thirty Third Report of the Social Development Committee

As Scores on Doors is still in its infancy in NSW, there is only limited data to draw upon to make categorical conclusions that businesses are improving their rating, however early data indicates that businesses are either maintaining or improving their rating.

The survey sent to councils asked them about business performance. Councils indicated that for those businesses that had a subsequent routine inspection since joining the Scores on Doors program (n=192), 93% of these businesses had either maintained or improved their rating.

Businesses participating in the pilot and trial were positive about the scheme

The overall opinions of food businesses who participated in the pilot and trial were positive. In addition to the benefits businesses believe about improving food hygiene, they believe there are other perceived benefits:

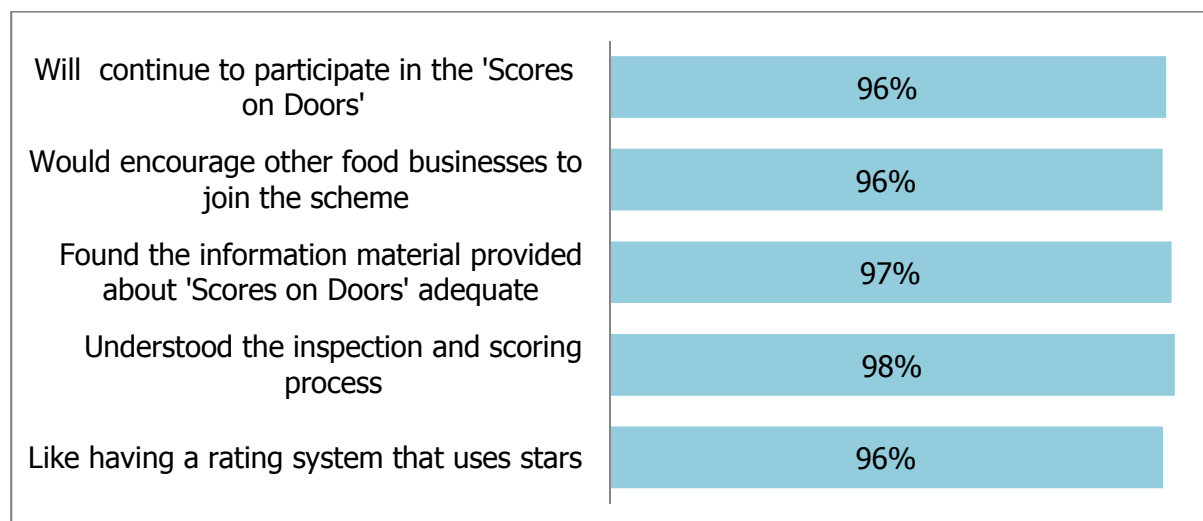
- Informs customers of the businesses good hygiene (71%)
- Attracts attention of passers-by (38%)
- Has been a marketing opportunity (35%)
- Provides a competitive edge (32%)

There is also ongoing support for the scheme:

- 93% of businesses participating in the pilot indicated they would continue with the scheme after the pilot. This figure increased to 96%, after completion of the trial
- After participating in the trial, 96% of businesses would encourage other food businesses to join the scheme
- Nearly all (98%) understood the inspection process during the trial
- 96% like having a system that uses stars (see 2)

Businesses have also had positive feedback from customers. Two-thirds of businesses surveyed said that they have received comments about their participation in Score on Doors and 97% of these comments were considered positive.

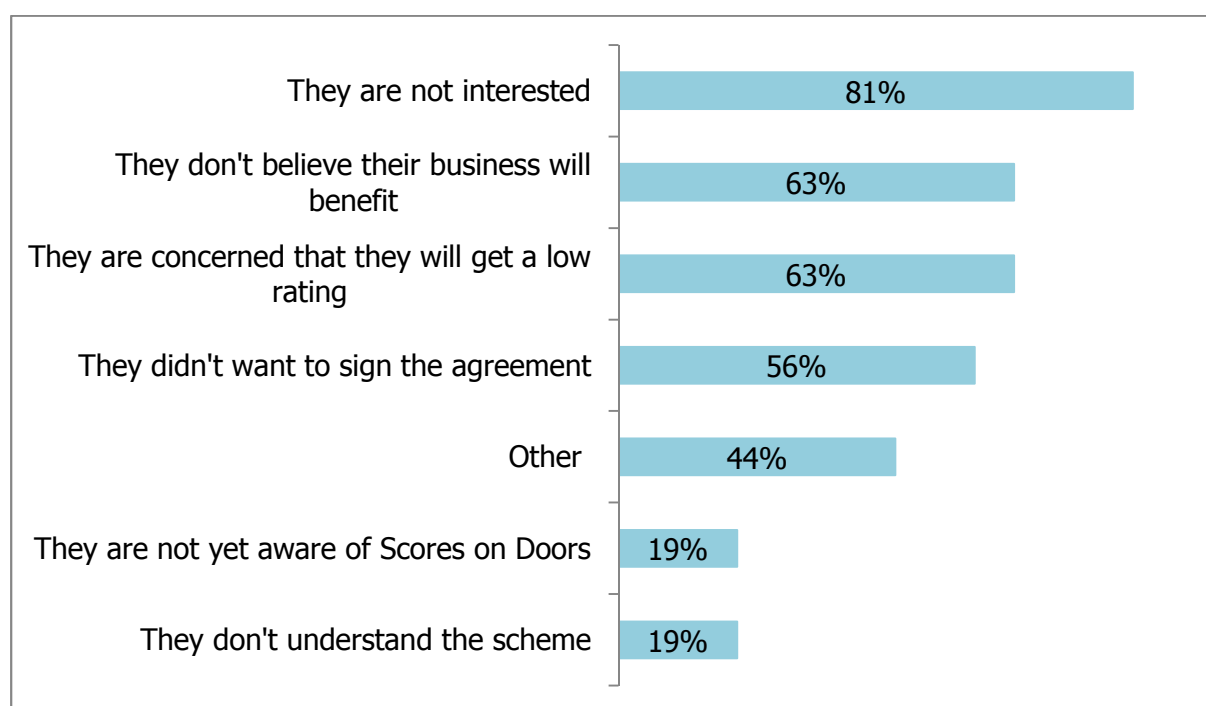
Figure 2. Businesses thoughts about the trial NSW Scores on Doors scheme



Councils' views on why businesses are not participating in the Scores on Doors scheme

Councils were asked for reasons why businesses may not be interested in joining the scheme. The majority (81%) said that they were not interested. Another reason was that they don't feel their business will benefit from the scheme. Councils believe that there is a small number of businesses that are either not aware of the scheme or do not understand the program. Those councils that selected the 'other' option, indicated that many businesses had told them they will not sign up until they receive a 5 star rating. Feedback received from both the pilot and trial indicated that businesses are reluctant to display low scores.

Figure 4. Councils' views on why businesses are not participating



There is also a perception among businesses that the scoring system is biased toward low-risk businesses in that it may be easier for a low-risk business to achieve a high rating. This is challenging as the nature of food safety means that where the risk is higher (such as in a full service restaurant) there are a greater number of factors to be considered, and therefore a higher likelihood that the business will accrue points—leading to a lower overall star rating. This challenge is present in all schemes nationally and internationally, although there is feedback from some councils and consumers that this perception is understood.

Results from the pilot evaluation, showed that businesses were wary of displaying a perceived 'low' ('C' grade), and not surprisingly, the findings from the trial system indicated that only 5% of businesses surveyed would be happy to display the lowest rating of 3 stars. The majority (76%) of businesses surveyed about the trial said that they would be happy to display 5 stars and 20% said that they would be happy to display 4 stars.

Six of the eighteen councils surveyed indicated that they had at least one business withdraw since commencing the scheme as they were unhappy with their rating or had dropped their rating. Businesses have also identified the scheme as a competitive disadvantage where they do not achieve the top rating. For clarity, it must be stated that this is, at least partially, the point of these schemes—to create a situation where high standards of food safety are seen as a competitive and market advantage and promote a food safety culture within businesses.

Interestingly, 86% of businesses indicated that they would be willing to pay for a re-inspection (in advance of the next scheduled regulatory inspection) if they received a poor score and had taken measures to rectify breaches found.

The Scores on Doors Participation Agreement also appears to have impeded uptake of the scheme, as businesses found the requirements of the agreement daunting, as well as having a fear of receiving a low score.

Participation in the Scores on Doors trial was via a written agreement between a participating council and each participating food business. The agreement was an expression of intent which outlined that businesses would participate for the twelve-month trial period and that the business would display their certificate when it was issued. Specifically, the agreement:

- a. defined council and business obligations under the scheme,
- b. enabled a business to request the council to review its grade, and
- c. provided termination conditions.

For a voluntary scheme to be effective it must be underpinned by some form of terms of agreement which outlines the conditions to which both parties are participating. The Authority has received feedback which is supported by survey results from both the businesses and councils indicating that the requirements of the participation agreement was daunting and businesses were hesitant to sign it.

Hospitality Industry Working Group support voluntary Scores on Doors scheme

The Hospitality Industry Working Group (HIWG) comprised representatives from peak food and hospitality associations and food retailers and a major food franchise business. Representatives included the Australian Hotels Association NSW (AHA), ClubsNSW, Restaurant and Caterers Association NSW (RCA), National Retail Association (NRA), Australian National Retail Association (ANRA), the Baking Industry Association and McDonalds.

The Authority sought feedback from the HIWG on the Scores on Doors trial and public disclosure schemes generally in NSW. There was a general consensus of support for the Scores on Doors scheme to continue on a **voluntary basis** in NSW based on the following:

- Reliance on the existing inspection regime, therefore not adding to cost
- Use of a three-tier grading scheme
- Representation of grades by a star symbol (ie 5 stars, 4 stars, 3 stars)
- Use of positive word descriptors to describe the stars, ie 5 stars – excellent, 4 stars – very good, 3 stars – good)
- Option for a food business to seek a re-assessment inspection from the council for additional, appropriate inspection fee
- Use of a standard certificate to display the grade in a conspicuous location near the entry of the business
- Review of the Agreement with a view to making it “less daunting” for food businesses to sign and understand
- Ability for the scheme to be adopted nationally

Further, the HIWG strongly supported:

- a. the use of the FPAR across all councils in the state to drive a consistent approach to food safety inspections by councils, and
- b. the introduction of a community education and awareness campaign to complement the extension of any score on door scheme.

The Working Group commented that the Name and Shame Registers may have a detrimental effect on businesses with fine profit margins and raised concerns about subjectivity in the issue of penalty notices. Further, Restaurant & Catering (NSW) has consistently advocated for the removal of the Name and Shame Register, whilst supporting the Scores on Doors approach.

Objective 2: Improve consistency and transparency in the conduct of food safety inspections

In the food retail and food service sector, the Authority works with local councils sharing responsibility for inspecting food premises and enforcing food safety law. This arrangement is known as the Food Regulation Partnership (FRP). Achieving consistent and improved interpretation of food inspections conducted by councils is a major area of work by the FRP and was a major focus for the Authority when developing the Scores on Doors pilot.

Inconsistencies can occur where one council inspector is seen to interpret food hygiene standards differently to another. Importantly, the Authority considered the need for consistency and coordination across the 152 local councils to be crucial to the development and successful implementation of a NSW scores on doors scheme. With this objective in mind, the Food Regulation Forum commenced work to improve consistency and enhance public understanding of food regulatory inspections and outcomes. An information package was prepared which included a standardised inspection checklist and guidelines for use by all council EHOs.

A standardised checklist will drive consistency of food safety inspections in NSW

The FPAR is a standardised food inspection checklist template that was first introduced by the Authority in 2010, following its development in consultation with Council EHOs. The FPAR is based on the requirements of the Food Standards Code (FSC) which are relevant to the food retail and food service sector. It focuses on the most important foodborne illness risk factors identified, including food temperature control, food prepared in advance of service, food handler hygiene, cleaning and sanitation and pest control. Over the past two years, the FPAR has been modified and further developed following feedback from councils during the trial period.

There are currently about 90 councils using the FPAR, 30 of these are using a FPAR checklist that is specific to Scores on Doors. The FPAR continues to be used by an increasing number of councils in NSW.

The Authority views this FPAR checklist as a critical prerequisite program to Scores on Doors, and the basis for a successful scheme. This checklist has the additional benefit towards achieving the goal of improving consistency and improved interpretation of food inspections conducted by councils along with the consistent use of enforcement tools.

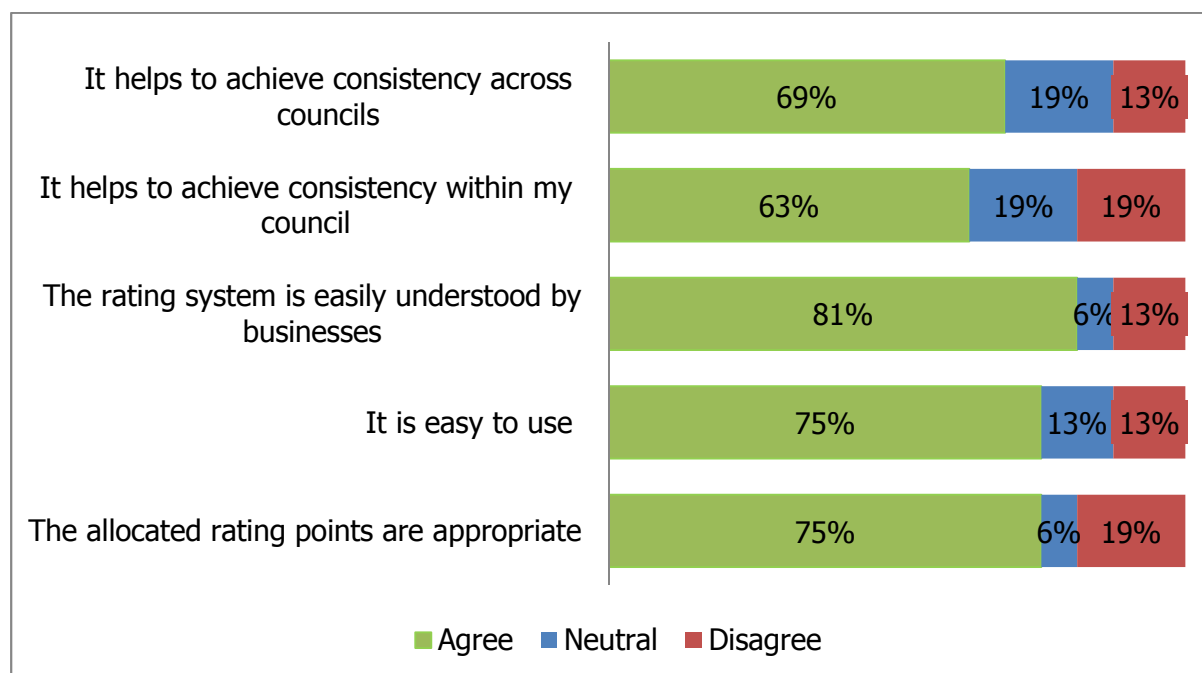
In October 2012 councils were asked questions about the FPAR. The majority of councils believe the assessment tool helps to achieve consistency across councils as well as within

each council. Three-quarters of councils believe that the checklist is easy to use and the allocated rating points are appropriate, and most councils believed that the rating system is easily understood by businesses.

Almost 80% of participating councils did not find the Scores on Doors inspections to take any longer. Those councils that believed it took longer said this was because they needed to explain the Scores on Doors program but this time is only minimal.

Uptake of this standardised inspection checklist by councils would help to ensure that there is consistency of inspections and interpretation of the relevant food regulatory standards i.e. the Food Standards Code and would form the basis of the NSW Scores on Doors scheme.

Figure 3. Councils' perception of Scores on Doors Food Premises Assessment Report form



A Scores on Doors scheme will bring greater transparency to inspections

As outlined, NSW businesses in the food retail and food service sector already undergo routine food safety and hygiene inspections. It would be pragmatic to use the outcomes of these inspections to let consumers know whether a particular food outlet is clean and safe to eat in.

A uniform, state-wide food safety rating scheme would provide transparency for consumers and promote accountability amongst the food retail and food service industry.

Feedback from Brisbane City Council believe that their Scores on Doors scheme has improved the council's transparency in relation to auditing and decision making on enforcement matters.

Objective 3: Provide consumers with useful, consistent information about food safety performance in the food retail and food service sector so that they can make informed choices

The Scores on Doors scheme provides consumers in NSW with point of sale information indicating how well food retail and food service businesses comply with food hygiene standards during inspections. The NSW star rating scheme simplifies inspection results into a format that is understandable to consumers dining at a food premises and allow consumers to make informed choices about where they eat and buy food.

In March 2011 the consumer group Choice published a review² of the schemes in place at that time. Following the completion of this work, Choice began advocating for the adoption of a nationally consistent Score on Doors scheme. Choice continues to publicly support the introduction of a single Scores on Doors system^{3,4}.

Consumers want equal access to information about hygiene standards of food businesses

Feedback gathered from consumer focus groups and surveys as part of the pilot evaluation was very positive towards the introduction of a Scores on Doors scheme in NSW. The Authority is of the view that consumer attitudes would not have changed significantly in the period between the completion of the pilot in 2010 and the end of the trial in August 2012.

The vast majority of consumers surveyed (83%) in the pilot indicated Scores on Doors is useful and, if grades were displayed by more businesses in NSW, they would use them to help make decisions about where to eat.

There was a general preference for the program to become mandatory in order to enhance the credibility of, and engagement with, the program.

Consumer feedback included a preference for obtaining food outlet grades online. If this option were available, there was preference for this to be via a central website rather than via local council sites, although some suggested offering both.

There was a request for more publicity and promotion of the program to increase public awareness and participation from both consumers and businesses.⁵

Community education is vital to the success of a Scores on Doors scheme

An intensive community education and awareness campaign will be required to complement the extension of any scores on door scheme. A strategy would need to be developed, implemented and appropriately resourced to assist in the understanding and acceptance of the food safety rating scheme by the general public.

Further, the Authority would need to ensure multi lingual information about the scheme is available and it is responsive to the needs of people in the general public from non-English speaking backgrounds.

Findings from the Authority's trial of Scores on Doors pilot scheme has identified that general public awareness of the scheme needed to be improved in those council's participating and that the lack of public knowledge around the scheme was contributing to a poor participation rate by businesses.

² "Score those doors" Review, Choice, published 31 March 2011. Available at <http://www.choice.com.au/reviews-and-tests/food-and-health/food-and-drink/safety/choice-awards-2011-best-restaurant-hygiene-rating-scheme/page/score-those-doors.aspx>

³ "Join our call for a national food hygiene scheme", March 30 2011, Choice. Available at <http://www.choice.com.au/consumer-action/food-labelling/food-labelling-review/scores-on-doors.aspx>

⁴ Note: The Authority has not specifically consulted with Choice during the conduct of this review, but will engage them as one of the major stakeholders should the Government decide to progress with the development of a revised or mandatory system.

⁵ NSW Food Authority (March 2011) NSW Scores on Doors Pilot Evaluation Report.

New technologies are key to disseminating information to consumers

It is apparent that new technologies such as an interactive website and mobile phone 'apps' should be considered in the development of any Scores on Doors scheme to effectively disseminate public information about food safety inspection scores.

The following chapter of this report indicates that many international food hygiene rating models have introduced online databases of inspection results (ie ratings/scores) to complement disclosure at premises. In New York, for example, a smart phone application is available for consumers to search for food safety ratings. The UK Food Standards Agency also has a free 'app' and a website search tool for food hygiene ratings.

However eating out is not always planned and access to the internet may not be either possible or practical. Therefore if a food hygiene rating is not displayed at the premises, consumers may still have no way of accessing this information before they choose where to eat or buy food.

International food hygiene rating schemes

Food hygiene rating schemes including scores on doors systems are common internationally and there are many variations and formats of these systems that exist. Whilst there is no universally agreed best method to communicate inspection results to consumers, the majority of these systems are mandatory (Denmark, Canada (Toronto), USA (New York, Los Angeles, San Diego, Ohio, Kentucky), Singapore, and New Zealand, with semi voluntary systems existing in the UK (England, Wales, Northern Island, Scotland).

Internationally, ratings systems vary from numerical scores, symbols (stars or smiley faces), letters ratings (eg 'A'), or statement cards (eg pass, closed). See Appendix 2.

International mandatory food hygiene ratings schemes have proven to be successful, by improving food safety compliance:

- In New York, eighteen months after the scheme was introduced, significant improvements were observed in restaurant sanitary practices including; improved hand washing facilities, decreased presence of pests; and improved hot and cold holding of food at safe temperatures. Also, the proportion of businesses earning 'A' grades on their initial inspection has steadily increased over eighteen months, resulting in less frequent inspections for these businesses⁶.
- In Denmark, there has been a 23.7% increase in happy smileys awarded in 2010 compared to those awarded in 2002⁷.
- The University of Maryland evaluated the Los Angeles scheme in 2003. It was found that before the scheme was launched in 1997, 25% of restaurants were regarded as in the 'best performing' category. This rose to over 50% in 1998 (and in 88% in 2006). The results of the evaluation also showed that revenue for the best performing premises increased by nearly 6% in 1998⁸.

Reduction in reported foodborne illness has also been demonstrated internationally, coinciding with the introduction of mandatory food hygiene rating systems:

- In New York, one year after the grading was introduced, reported cases of *Salmonella* infections fell 14% from the previous year, to a level lower than New York City had seen for at least 20 years⁶.
- In Toronto, the incidence of sporadic cases of foodborne illness between 2003–2007 was about 30% lower than it was between 1998–2002, coinciding with the increased compliance with food safety regulations resulting from the introduction of the 'DineSafe' program in 2000–2001⁹.

⁶ New York City Health (2012). Restaurant Grading in New York City at 18 months- Public Recognition and Use of Grades and Trends in Restaurant Sanitary Conditions and Foodborne Illnesses.

⁷ Smileys keep food safety high in Denmark (May 2011). Ministry of Food, Agriculture and Fisheries, Danish Veterinary and Food Administration. Accessed on 7/11/12 at <http://www.findsmiley.dk/en-US/Forside.htm>

⁸ Ginger Zhe Jin and Phillip Leslie (2003). The effect of information on product quality: evidence from restaurant hygiene grade cards. *Quarterly Journal of Economics*, 118(2).

⁹ Toronto Public Health (April 2009). Foodborne Illness in Toronto. Accessed 7/11/12 at http://www.toronto.ca/health/moh/pdf/staffreport_april15_2009_appx_a.pdf

Over time, voluntary systems have also shown to be successful when there is participation and support from all local authorities. In the UK, the 'Food Hygiene Rating Scheme' was introduced in 2005 and by the end of 2012 it is estimated that 97% of authorities will have adopted the scheme¹⁰. Although currently voluntary in Wales, a Bill has been submitted to parliament for consultation for mandatory adoption.

This being said, food hygiene rating systems operating internationally are generally mandatory or heading towards a mandatory approach and there is robust evidence that these systems have a positive impact on food safety compliance.

Other Australian food hygiene rating schemes

In Australia, there are a number of variations in Scores on Doors systems operating. Appendix 2 lists the details of the systems operating nationally.

Voluntary systems are currently operating in NSW, Victoria (Glen Eira and Whitehorse councils), South Australia (Charles Sturt and Salisbury councils), and the Australian Capital Territory has been assessing different options for Scores on Doors systems.

A star rating system called 'Eat Safe' was introduced in Queensland (Brisbane and Logan councils) in 2010, and participation is mandatory for all businesses in these councils. However, for those businesses that receive a 3, 4 or 5 star rating, the display of the certificate is voluntary. Businesses do not receive a certificate if they receive 0–2 stars.

In 2011, two councils in Tasmania (Break O'Day and Glamorgan) introduced a similar system to the Queensland model, where all businesses participate but display of the certificate is voluntary.

Brisbane City Council commenced a star rating system 'EatSafe' in 2010 and preliminary data collected from 2007 to 2012, shows that complaints relating to unsafe food and foodborne illness have significantly decreased during the period 2010–2012 after the rating system was introduced. However, the council has noted an increase in complaints relating to food premises or food safety standards. This may suggest that consumers are becoming more aware of food hygiene issues and have an interest in reporting issues.

Brisbane council has acknowledged that a Scores on Doors system allows resources to be targeted to low performing businesses. As a result, the council has seen a 20% decrease in the number of businesses rated with 2 stars.

The City Of Salisbury Council in South Australia operates a voluntary Scores on Doors program and indicates that its program has had a strong effect on increasing the compliance levels in food businesses in its area. Since it first began the program the average score for businesses had increased by 12% from 78 to 90 (out of a possible 100). As well there had been a 133 per cent reduction in minor non-conformances and a 380 per cent reduction in major non-conformances.¹¹

¹⁰ Food Standards Agency (May 2012), Food Hygiene Rating Scheme and Food Hygiene Information Scheme-Increasing provision of information to consumers on the hygiene standards of food premises.

¹¹ Hospitality (November 2012) *Food Safety in the stars*. Available at www.hospitalitymagazine.com.au pp25-26

Online databases are often used to complement disclosure at premises

International experience has found that for a food hygiene rating system to be successful, it is dependent on food industry support (by means of display of ratings at premises), and consumer awareness, understanding and use of the schemes.

To optimise public disclosure and consumer awareness, many countries (including Canada (Toronto), Denmark, UK, and USA (Los Angeles, San Diego, Kentucky, and Ohio)) have introduced online databases of inspection results (ie ratings/scores) to complement disclosure at premises. In New York and the UK, a smart phone application is available for consumers to search for food safety ratings.

In Australia, a number of individual councils (across various states) publish a list of good performers on their website; New South Wales (City of Sydney, Greater Taree, Cootamundra, Kogarah, Canada Bay), South Australia (Charles Sturt and Salisbury), Queensland (Brisbane and Logan), Victoria (Whitehorse) and Tasmania (Break O'Day). Brisbane council has also developed a smart phone application 'Safe Eat' that publishes the star ratings.

Complementary disclosure of ratings is particularly important for voluntary schemes, as low scoring businesses are often reluctant to display their score. The UK Food Standards Agency (FSA), acknowledged in a recent evaluation of its hygiene ratings scheme that if results are published on an online website alone, this would not be satisfactory. Disclosure of results at the premises is important for those customers that do not have internet access or make spontaneous choices about where they eat¹⁰.

FSA also highlighted that promotion and publicity is critical to the success of a food hygiene rating system irrespective of whether display of the information at premises is mandatory or not. Consumers must be aware and understand the scheme, and believe that it is relevant and useful to be successful.

Incentives are commonly used to encourage participation and good performance

Internationally and in Australia, a range of financial and non-financial incentives are commonly used to encourage businesses to join a system or to perform well in inspections.

Internationally, the following incentives are offered to businesses:

- In New York, inspection frequency is reduced (ie twelve months) for A-rated businesses, plus businesses can be awarded a Golden Apple award of excellence
- In Denmark, an 'elite smiley' rating is given to businesses that consistently receive top ratings
- Auckland council offers a 'Gold A' certificate to businesses that achieve a high level of conformance consistently

In Australia, various incentives are offered:

- Reduced inspection fees are offered to businesses that receive 4 or 5 stars (City of Sydney)
- Promotion on the council website (City of Sydney, Taree, Cootamundra, Kogarah and Randwick Shire councils in NSW)

- Discounts on annual license fees given to higher performers (Logan council in QLD, Break O'Day in Tasmania, and Glen Eira and Whitehorse councils in Victoria)
- A reduced inspection frequency offered to businesses that receive three consecutive 5 star ratings (Greater Taree in NSW)
- Fewer audits for 4 and 5 star businesses (Break O'Day in Tasmania)
- Publication in community newsletters or publications (Whitehorse and Glen Eira in Victoria, and Kogarah and Randwick in NSW)
- Awards for 'Shop of the Year' who then receive monetary prizes (Glen Eira and Whitehorse councils in Victoria)

Framework principles developed for a national Scores on Doors scheme

The Authority chaired a national Implementation Sub-Committee (ISC) Working Group (a subcommittee of the Food Regulation Standing Committee) on development of a national Scores on Doors scheme. Ideally, a single, consistent national scheme is preferred to avoid confusion among food businesses and consumers. Whilst there is no single preferred scheme or combination of schemes within Australia or internationally, there are a number of basic principles that are utilised in schemes adopted.

In August 2012 the ISC Working Group recommended a high level framework for jurisdictions who chose to implement a voluntary 'scores on doors' system.

The recommended framework principles are:

1. Reliance on compliance inspection regimes conducted within jurisdictions by an 'authorised officer' of an appointed 'enforcement agency'.
2. Use of a standardised checklist template that is based on compliance with the requirements of the Food Standards Code¹² (FSC) and the relevant legislation.
3. Use of a nationally accepted scoring system.
4. Calculation of a grade from the results of an inspection on core FSC elements using a standardised checklist template.
5. A tiered grading scheme.

Any future development work of a Scores on Doors scheme in NSW should consider these principles. However, it should be noted that the current Scores on Doors scheme already aligns with the listed 'framework' principles.

¹² In the case of New Zealand, the New Zealand Food Act applies.

NSW Name and Shame Register

The Authority publishes lists on its website of businesses that have breached or are alleged to have breached (in the case of a Penalty Notice) NSW food safety laws. These lists are compiled from enforcement work undertaken by both the Authority and local councils in NSW.

Businesses or individuals are included on the penalty notice register if they have been issued with a penalty notice for an alleged food safety offence and have not challenged the notice, for example by electing to have the matter dealt with by a court. The information about each notice will generally be published for one year from the time it was first eligible to be published. Decisions about which (and when) penalty notices are published are made according to the Authority's Penalty Notice Publication Protocol.

Businesses or individuals are listed on the prosecution register if they have been found guilty by a court of a breach of food safety laws. The information on each breach will generally be published for two years following any appeal period.

Name and Shame Register introduced in 2008 following public debate

The Authority's Name and Shame policy was developed in response to public debate about the level of information available to the public regarding food law breaches. Prior to what is now commonly referred to as the Name and Shame Register, the Authority published limited details of its own successful prosecutions only in the Government Gazette. Details of penalty notices and prosecutions were also released in response to requests under Freedom of Information legislation.

The *Food Amendment (Public Information on Offences) Bill 2008* was introduced to provide the legislative framework to routinely publish serious food breaches (successful prosecutions and uncontested penalty notices).

The Authority undertook to provide mechanisms to ensure the appropriate and accurate publication of information and introduced a Penalty Notice Publication Protocol. This is designed to promote consistency and filter out minor or technical breaches, thereby only publishing successful prosecutions and serious breaches. Appendix 3 provides a summary of the publication process including the decision matrix and its criteria.

Since the Name and Shame Registers commenced in 2008, the Authority has also worked with councils to promote a graduated enforcement response in relation to non-compliance with standards in accordance with the Authority's *Compliance and Enforcement Policy*. This has included specific training and the introduction of the standardised inspection template (FPAR).

The number of businesses on the Authority's name and shame register continue to decrease, down by almost half compared to the 1309 listed in 2009–2010. It is also important to note that the number of businesses listed on the Name and Shame website is relatively low. In 2011–2012 a total of 785 businesses were listed, which is less than 2% of the state's approximately 55,000 food businesses.

Preliminary reasons for this decrease may be twofold. First, councils are issuing penalty notices in a more consistent manner. Second, hygiene standards have improved generally and the name and shame register has been an incentive, with businesses not wanting to receive negative publicity. This is also evident in the Authority's statistics which indicate that there is a low level of repeat offenders.

The Authority does continue to see an over-representation of businesses whose management are from a non-English speaking background. The Authority continues to develop targeted educational programs for these businesses with information translated into various languages. This is supplemented by programs and translations offered by councils.

Name and Shame Register integral to balanced approach to improving food safety

The NSW Scores on Doors scheme has operated alongside the Name and Shame Register and in some instances provided an opportunity for a business listed on Name and Shame to prove to prospective customers that it has addressed its problems.

The Name and Shame Register exists within the package of Authority initiatives designed to bring a comprehensive and balanced approach to improving food safety in the retail food sector and reducing foodborne illness. The Name and Shame Register informs the public of who has done the wrong thing with the Scores on Doors scheme rewarding good food business performers.


Hits to the Authority's Name and Shame Register now exceed five million, however not every person in NSW necessarily uses or has access to the internet. Further, eating out is not always planned, decisions are spontaneous, access to the internet may not be practical and therefore if a food hygiene rating is not displayed at the premises, consumers may have no way of accessing this information before they choose where to eat or buy food.

The *Government Information (Public Access) Act 2009* (GIPA) came into effect on 1 July 2010 replacing the *Freedom of Information Act 1989*. It introduced a new approach to accessing information held by government with a focus on making government information more readily available. One council has indicated that they are considering the merits of publishing their inspection reports online via the GIPA provisions. It is common practice in the USA to publish restaurant inspection reports online.

The introduction of a state-wide standardised food hygiene rating scheme would provide an appropriate balance, providing consumers with information about a food business' hygiene rating (both good and bad) and meet the intent of GIPA to make information more readily available, potentially avoiding unnecessary applications by formal GIPA processes.








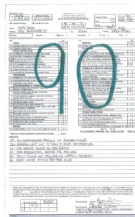


Dependent on the final nature of the Scores on Doors scheme, the Authority could consider the feasibility of modifications to the Name and Shame Registers such as reducing the time period that businesses remain on the register and inclusion of 'consumer friendly' descriptors of the offences.

Appendix 1 – Food Premises Assessment Report (FPAR)

Food Premises Assessment Report		FPAR V.2, 04/11	
	Trading name	Email	
	Person interviewed	Date/time	
	Proprietor/company	Phone	
	Address	Ref no.	
		Inspection type	
	Food Safety Supervisor	Cert no.	

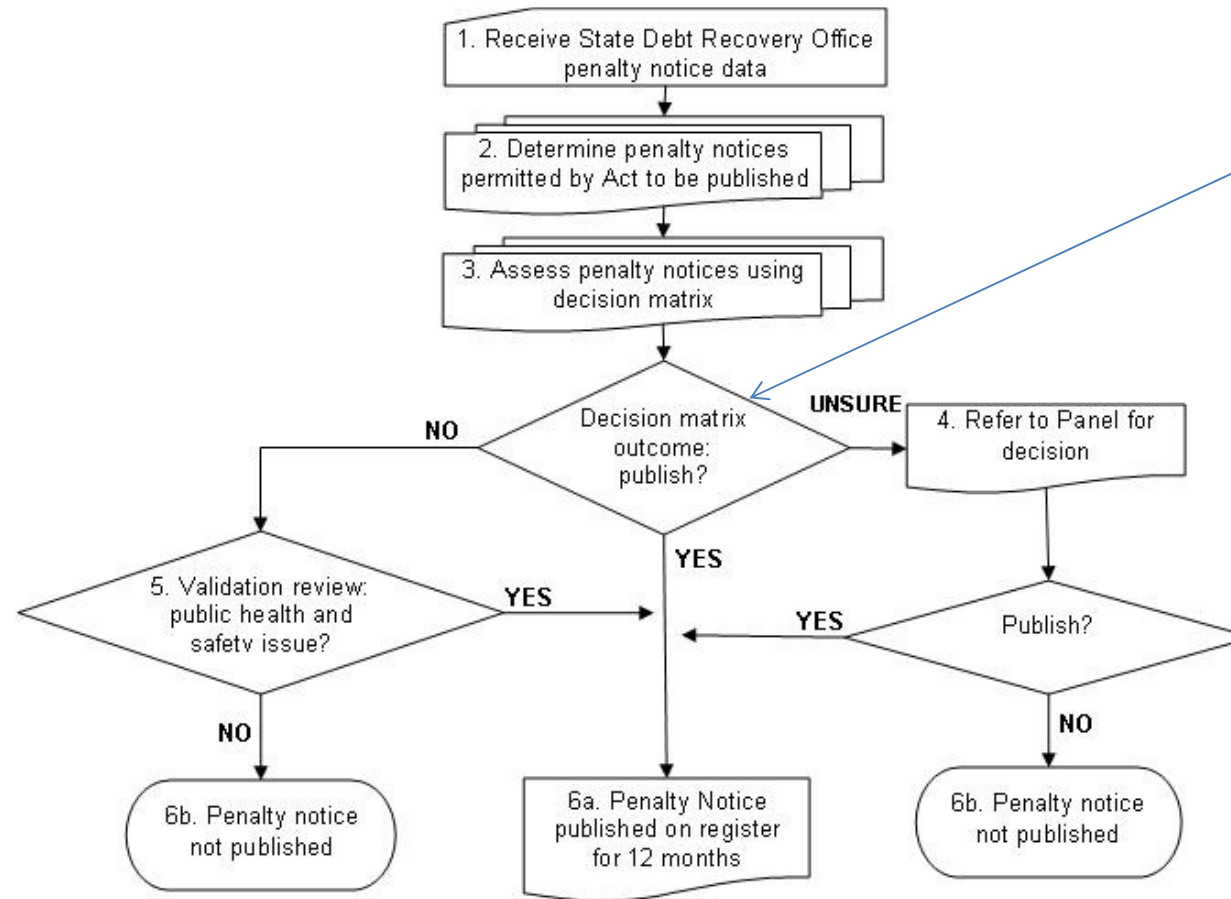
<p>General Requirements Satisfactory <input type="checkbox"/></p> <p>1. <input type="checkbox"/> Food business has notified details to NSW Food Authority www.foodnotify.nsw.gov.au 1</p> <p>2. <input type="checkbox"/> Food Safety Supervisor is notified and FSS certificate is on the premises 1</p> <p>3. <input type="checkbox"/> Food handlers have skills and knowledge to handle food safety 1</p> <p>4. <input type="checkbox"/> No sale of food that is damaged, deteriorated or perished; no use of cracked or dirty eggs or food past use by date 4</p> <p>Food Handling Controls FSS 3.2.2 cl 5-12 Satisfactory <input type="checkbox"/></p> <p>5. <input type="checkbox"/> Food protected from the possibility of contamination; <i>food receipt, storage, display and transport</i> 4</p> <p>6. <input type="checkbox"/> Names and addresses are available for manufacturer, supplier or importer of food 1</p> <p>7. <input type="checkbox"/> Potentially hazardous food (PHF) is under temperature control: <i>food receipt, storage, display and transport; less than 5 degrees, above 60 degrees Celsius. Frozen food is hard frozen</i> 1 4 8</p> <p>8. <input type="checkbox"/> Processing of foods; <i>items thawed correctly; processed quickly; no contamination risk</i> 4</p> <p>9. <input type="checkbox"/> Cooked PHF is cooled rapidly 8</p> <p>10. <input type="checkbox"/> Reheating of PHF is rapid - oven, stove top or microwave but not bain marie 8</p> <p>11. <input type="checkbox"/> Self serve food bar is supervised, has separate utensils and sneeze guard 1</p> <p>12. <input type="checkbox"/> Food wraps and containers will not cause contamination 1</p> <p>13. <input type="checkbox"/> Food for disposal is identified and separated from normal stock 1</p> <p>Health and Hygiene FSS 3.2.2 cl 13-18 Satisfactory <input type="checkbox"/></p> <p>14. <input type="checkbox"/> Food handlers wash and dry hands thoroughly using hand wash facilities 4</p> <p>15. <input type="checkbox"/> Food handlers avoid unnecessary contact with ready to eat food or food contact surfaces by use of utensils, a gloved hand, food wraps etc 1</p> <p>16. <input type="checkbox"/> Food handlers do not spit or smoke in food handling areas or eat over exposed food or food contact surfaces 4</p> <p>17. <input type="checkbox"/> Food handlers have clean clothing, waterproof covering on bandages 1</p> <p>18. <input type="checkbox"/> Food handlers wash hands before <i>commencing/recommencing work and after: using the toilet, coughing, sneezing, smoking, handling raw meat, cleaning etc</i> 8</p> <p>19. <input type="checkbox"/> Food handlers do not handle food if ill (eg vomiting, gastro) 8</p> <p>20. <input type="checkbox"/> Hand washing facilities easily accessible and used only for washing of hands, arms and face 1</p> <p>21. <input type="checkbox"/> Hand washing facilities have warm running water through single spout, single use towels (or air dryer) and soap 4 8</p> <p>Cleaning and Sanitising FSS 3.2.2 cl 19-20 Satisfactory <input type="checkbox"/></p> <p>22. <input type="checkbox"/> Premises, fixtures, fittings and equipment maintained to an appropriate standard of cleanliness 1 4 8</p> <p>23. <input type="checkbox"/> Food contact surfaces, eating and drinking utensils in a clean and sanitary condition/appropriate sanitising method in use (eg chemicals or dishwasher) 1 4 8</p> <p>Miscellaneous FSS 3.2.2 cl 22-23 Satisfactory <input type="checkbox"/></p> <p>24. <input type="checkbox"/> Accurate temperature measuring device readily accessible (eg digital probe thermometer) Accurate to +/- 1 degree Celsius 1</p> <p>25. <input type="checkbox"/> Single use items protected from contamination and not reused (eg drinking straws, disposable utensils) 1</p>	<p>Animal and Pests FSS 3.2.2 cl24 Satisfactory <input type="checkbox"/></p> <p>26. <input type="checkbox"/> Live animals not permitted in areas in which food is handled 1</p> <p>27. <input type="checkbox"/> Practical pest exclusion measures used (eg screens, doorseals) 1</p> <p>28. <input type="checkbox"/> Practical measures to eradicate and prevent harbourage of pests used (eg housekeeping, stock rotation, pest controller) 1</p> <p>29. <input type="checkbox"/> No signs of insect infestation or rodent activity in premises 1 4 8</p> <p>Design and Construction FSS 3.2.3 Satisfactory <input type="checkbox"/></p> <p>30. <input type="checkbox"/> General design and construction of premises appropriate 1</p> <p>31. <input type="checkbox"/> Adequate supply of potable water available 1</p> <p>32. <input type="checkbox"/> Premises has adequate sewerage and waste water disposal system 1</p> <p>33. <input type="checkbox"/> Premises has adequate storage facilities for garbage and recyclable matter 1</p> <p>34. <input type="checkbox"/> Premises has sufficient lighting 1</p> <p>35. <input type="checkbox"/> Floors are able to be effectively cleaned 1</p> <p>36. <input type="checkbox"/> Walls and ceilings are sealed and able to be effectively cleaned 1</p> <p>37. <input type="checkbox"/> Fixtures, fittings and equipment are able to be effectively cleaned and, if necessary, sanitised 1</p> <p>38. <input type="checkbox"/> Adequate ventilation provided within the premises 1</p> <p>39. <input type="checkbox"/> Premises has adequate storage facilities (eg chemicals) 1</p> <p>Maintenance FSS 3.2.2 cl 21 Satisfactory <input type="checkbox"/></p> <p>40. <input type="checkbox"/> Premises, fixtures, fittings and equipment in a good state of repair and working order 1</p> <p>41. <input type="checkbox"/> No chipped, broken or cracked eating or drinking utensils observed 1</p> <p>Labelling FSC Chapter 1 Satisfactory <input type="checkbox"/></p> <p>42. <input type="checkbox"/> Food labelling complies with the Food Standards Code 1</p> <p>Total Points</p> <p>Food Business Grade</p> <p><input type="checkbox"/> ★★★★★ (0-3 points)</p> <p><input type="checkbox"/> ★★★★ (4-8 points)</p> <p><input type="checkbox"/> ★★★ (9-15 points)</p> <p><input type="checkbox"/> No grade awarded (more than 15 points)</p> <p>Checklist items scoring 4 or 8 points have potential to impact directly on food safety and should be addressed as a priority</p> <p>Further action required</p> <p><input type="checkbox"/> Reinspection <input type="checkbox"/> Warning Letter <input type="checkbox"/> Improvement Notice</p> <p><input type="checkbox"/> Prohibition Order <input type="checkbox"/> Penalty Notice <input type="checkbox"/> Other <input type="checkbox"/> Pending</p> <p>Indicate compliance using <input type="checkbox"/>, non compliance <input type="checkbox"/>, or not observed <input type="checkbox"/></p> <p>I have read this report and understand the contents.</p> <p>Owner/Employee signature: _____</p> <p>Officer's name: _____</p> <p>Council: _____</p> <p>Officer's signature: _____ Phone: _____</p> <p>NB: Assessment report contains findings from date/time of inspection only</p>
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Appendix 2 – National and international Scores on Doors systems

	Nationally		Internationally	
	Voluntary	Mandatory	Voluntary	Mandatory
Date and description of system introduced 2001 ↓ 2012	<p><i>VIC (1996)</i>: 5 star rating system introduced in two councils (Glen Eira and Whitehorse). Voluntary for councils and businesses.</p> <p><i>NSW (2010)</i>: June 2010 – Pilot conducted in 20 councils using letter system (A–C). From August 2011 to August 2012, trial of star rating system conducted. Voluntary for councils and businesses. One council, Canada Bay operates using a star ratings system/certificate unique to other councils.</p> <p><i>SA (2009)</i>: Star rating (no stars to 5 stars are being used in one council (Salisbury). Another council is using 'Deliciously Safe' rating system (Charles Sturt), which offers a high visibility sticker to fully compliant businesses only. Voluntary for councils and businesses.</p> <p><i>ACT (2012)</i>: Regulatory Impact Statement published in June 2012 assessing four different options for SODs systems ranging from voluntary to mandatory.</p>	<p><i>QLD (2010)</i>: 'Eat Safe' star rating system introduced in two councils (Brisbane and Logan). Not mandatory state-wide but mandatory for businesses in these two volunteering councils. Display of the certificate is voluntary.</p> <p><i>TAS (2011)</i>: 'Eat Safe East Coast' star rating system introduced in two councils (Break O'Day and Glamorgan). Not mandatory state-wide but mandatory for businesses in these two volunteering councils. Based on the Queensland rating system. Display of the certificate is voluntary.</p>	<p><i>UK (England, Wales & Northern Ireland 2005)</i>: Numerical 'Food Hygiene Rating Scheme' scores (0–5). Scheme formally launched nationally November 2010 and is voluntary for councils and businesses. Estimated that 100% of authorities will have adopted the scheme by Dec 2012.</p> <p><i>Wales</i>: Although currently voluntary, Bill has been submitted to parliament for consultation for mandatory adoption (earliest 2014).</p> <p><i>UK (Scotland 2005)</i>: 'Food Hygiene Information Scheme' 21/32 authorities are running the program. Remaining 11 have shown commitment (2012) to adopt the scheme.</p>	<p><i>Denmark (2001)</i>: 'Smiley Scheme'- 4 levels. Mandatory for all businesses.</p> <p><i>Canada (Toronto 2001)</i>: 'DineSafe' colour-coded statement card system (eg Pass, Conditional Pass, or Closed notice). Mandatory for those businesses in participating councils.</p> <p><i>USA (New York, Los Angeles, San Diego) (2010)</i>: Mandatory for businesses in these cities to display A, B, C grades.</p> <p><i>USA (Ohio 2006)</i>: colour-coded system operating in 2 areas (Columbus and Worthington).</p> <p><i>USA (Kentucky 2011)</i>: colour-coded numerical value displayed on inspection report.</p> <p><i>Singapore (2010)</i>: 4 tier grading system A-D mandatory for food factories and food retail businesses.</p> <p><i>New Zealand (2009)</i>: Councils can voluntarily introduce the Food Hygiene Grading system. In Auckland council, all businesses selling food must display their certificate of registration which includes a grade A-E.</p>
Rating systems currently being used	 	 		    

	Nationally		Internationally	
	Voluntary	Mandatory	Voluntary	Mandatory
Displayed in-store?	<p><i>NSW, QLD and TAS:</i> businesses can choose to display certificate if they have 3 or more stars.</p> <p><i>SA:</i> Only compliant businesses are given 'Deliciously Safe' stickers in Charles Sturt area. Businesses in Salisbury area can voluntarily display star rating.</p> <p><i>VIC:</i> Businesses that receive a 5 star rating are able to display a certificate at the premises.</p>		<p><i>UK (England, Wales, Northern Ireland & Scotland):</i> certificate display voluntary.</p>	<p><i>Denmark:</i> inspection report must be displayed at entrance.</p> <p><i>Canada (Toronto):</i> grade must be displayed near entrance.</p> <p><i>USA (New York, Los Angeles, San Diego, Kentucky, Ohio):</i> mandatory display of grade card on-site.</p> <p><i>Singapore:</i> mandatory display of grade.</p> <p><i>New Zealand (2009):</i> In Auckland council, all businesses selling food must display their certificate of registration which includes grade A–E.</p>
Published online?	<p><i>SA (Charles Sturt council):</i> publishes list of 'Deliciously Safe' businesses on website. http://www.charlessturt.sa.gov.au/page.aspx?u=354</p> <p><i>SA (Salisbury council):</i> publishes list of good performers on councils website. http://www.salisbury.sa.gov.au/</p> <p><i>VIC (Whitehorse council):</i> businesses promoted on council website. http://www.whitehorse.vic.gov.au/Food-Hygiene-System.html</p> <p><i>TAS (Break O'Day):</i> Businesses can choose to display their star rating on website. http://www.bodc.tas.gov.au/tourism/accommodation-dining</p> <p><i>NSW (City of Sydney, Greater Taree, Cootamundra, Kogarah, Canada Bay):</i> rating results published on councils website.</p>	<p><i>QLD (Brisbane council):</i> publishes Eat Safe star ratings on a smart phone application. http://www.brisbane.qld.gov.au/community/community-safety/food-safety/star-rating-search/index.htm</p> <p><i>QLD (Logan council):</i> publishes good performers on councils website. http://www.logan.qld.gov.au/laws-and-permits/business-licensing/eat-safe-logan/search</p>		<p><i>Denmark:</i> Since 2004 all results available online at www.findsmiley.dk</p> <p><i>UK:</i> all results published online at http://ratings.food.gov.uk</p> <p><i>USA (San Diego):</i> scores available on a central website www.eatSAFEsandiego.org</p> <p><i>USA (Los Angeles):</i> http://publichealth.lacounty.gov/rating/</p> <p><i>Canada (Toronto):</i> all inspection results published on http://www.toronto.ca/fooddisclosure</p> <p><i>USA (Ohio):</i> all inspection results published http://www.decadeonline.com/main.phtml?agency=COL</p> <p><i>USA (Kentucky):</i> http://www.lexingtonhealthdepartment.org/ProgramsServices/RestaurantInspections/tabid/87/Default.aspx</p> <p><i>USA (New York):</i> ratings available on smart phone and tablet applications</p>
Incentives given to businesses to join Scores on Doors	<p><i>NSW:</i> Some councils in NSW are offering a discount to businesses that choose to participate. In one council higher discounts are given to better performers.</p> <p><i>SA (Charles Sturt and Salisbury councils)</i> publish a list of good performers on their websites.</p> <p><i>VIC (Glen Eira & Whitehorse):</i> 5 star ratings receive reduced council fees, promotion in website and publications, eligible for 'Shop of the Year' award.</p>	<p><i>QLD (Logan city council):</i> Higher performers will receive discounts on their annual license fee and be published on the council's website.</p> <p><i>TAS:</i> fewer audits and discounts on annual license fees are given to businesses with 4 or 5 star ratings. Ratings published on councils website.</p>		<p><i>USA (New York):</i> Financial discounts given for A-grade. Complimentary system 'Golden Apple quality Improvement Initiative' awards excellence in food safety with a certificate and decal valid for 1 year.</p> <p><i>Denmark:</i> An 'elite-smiley' rating was introduced in 2008 for businesses that consistently receive top ratings.</p> <p><i>New Zealand:</i> Gold A awarded to high performing businesses.</p>

Appendix 3 – Summary of penalty notice publication process



		Risk profile of food business sector			
		P1	P2	P3	P4
Breach severity	A	publish	publish	publish	publish
	B	publish	publish	publish	do not publish
	C	do not publish	do not publish	do not publish	do not publish

Decision matrix 'breach severity'

A – very likely to result in, or has resulted in, production of unsafe, unsuitable or inaccurately labelled food. Failure to comply with a previous enforcement request also falls into this category

B – likely to result in production of unsafe, unsuitable or inaccurately labelled food

C – unlikely to result in production of unsafe, unsuitable or inaccurately labelled food