



# 'Scores on Doors'

Pilot evaluation report

(March 2011)



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## **Executive summary**

'Scores on Doors' is a scheme for disclosing the inspection result achieved by food premises. The 'Scores on Doors' scheme in NSW is intended to assess 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, will generate 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.

The Minister for Primary Industries and the Presidents of the NSW Local Government and Shires Associations jointly announced a 'Scores on Doors' initiative in April 2010. The initiative was piloted between July and December 2010 in 20 local councils using a model developed by the Authority over the preceding 18 months, with a view to state-wide introduction of an agreed scheme (on a voluntary basis) from July 2011.

The model piloted was based on the use of a standardised food business inspection checklist (Food Premises Assessment Report), scoring scheme and guidelines for inspections and standardised display material.

The Pilot provided an opportunity to test the operation and display of the scheme and to take account of stakeholder views including food businesses, food industry peak associations, councils and consumers.

The Pilot was evaluated with input from local government, the food industry and key associations and consumers, to inform a proposed state-wide roll out of a voluntary 'Scores on Doors' scheme from July 2011.

### **Food business attitudes**

There was positive support from food businesses who participated in the Pilot. A majority indicated they would continue with the scheme after the Pilot and believed that participation in a 'Scores on Doors' scheme would help to raise awareness of food safety standards within their business and be a positive reinforcement for staff attitude and behaviour. Food businesses were split on their preference for what they considered the best method of display for the grade obtained. One of the key issues raised by these businesses was the need for a comprehensive communication and publicity package for business and consumers if the scheme were to be introduced state-wide.

There was substantial consensus from the associations represented on the Food Hospitality Industry Working Group to support the introduction of a 'Scores on Doors' scheme that was based on:

- 3 tier grading scheme
- grades represented by a star symbol
- positive word descriptors 'excellent', 'very good' and 'good'
- voluntary system based on support and promotion by industry associations
- ability to be adopted nationally

One association, the Australian Hotels Association (AHA) had reservations regarding the adoption of a grading scheme and did not support this as a model, preferring a “pass/fail” scheme. The AHA did not support the scheme being adopted nationally.

### **Local Government/Council feedback**

Overall there was a positive response from the councils who participated in the Pilot and the NSW Regional Council Food Groups when discussing the ‘Scores on Doors’ scheme. A number of additional councils have expressed interest in adopting the scheme once it is reviewed and relaunched in 2011. One council participating in the Pilot indicated that they will not be proceeding with the ‘Scores on Doors’ scheme after the conclusion of the Pilot.

The Food Regulation Forum gave its support to the development and implementation of a voluntary, state-wide ‘Scores on Doors’ scheme.

These groups recognised the benefits of a uniform food business inspection checklist and guidelines being used across NSW to improve consistency and interpretation of inspections. The ‘Scores on Doors’ Pilot had helped enable the development, road testing and adoption of these standardised documents by local government.

The overall consensus from council feedback was to support a grading scheme using stars with word descriptors. The use of the ‘P’ grade and “Participant” display certificates should be discontinued. The display certificate should indicate the range of grades available.

### **Consumer attitudes and awareness**

Feedback gathered from consumer focus groups and surveys was very positive towards the introduction of a ‘Scores on Doors’ scheme. The vast majority of consumers surveyed (83%) 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.

A majority of consumers surveyed favoured a grading scheme using star symbols with accompanying wording. The use of the ‘P’ grade and “Participant” display certificates should be discontinued. The display certificate should indicate the range of grades available.

Consumer feedback included a preference for obtaining food outlet gradings 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. In addition to word of mouth, local media was seen as an effective medium to achieve this.

## **1. Background**

A joint announcement was made on 4 April 2010 by the Minister for Primary Industries and the Presidents of the Local Government and Shires Associations that a state-wide 'Scores on Doors' scheme is to be introduced on a voluntary basis for NSW. The Food Regulation Forum agreed that the NSW Food Authority should develop and pilot a state-wide model for voluntary use by councils across NSW, in consultation with local government and the retail and food service industry.

## **2. Objective**

The objective of the Pilot was to conduct an investigation seeking the views of local government, food businesses and consumers on the most effective way to introduce a 'Scores on Doors' scheme to NSW to allow consumers to make informed choices and improve food safety and hygiene standards.

## **3. Introduction**

### **3.1 Reasons for 'Scores on Doors'**

The Authority is committed to examining the best mix of regulatory and non-regulatory means of improving standards of food safety and increasing transparency of food hygiene for consumers. The introduction of a 'Scores on Doors' scheme in NSW is an attempt to improve consistency of inspections and outcomes for food businesses and then simplify results into a format that is understandable to consumers dining at a food premises. This will allow consumers to make informed choices about where they eat. Their choice would be based, not only on menus, but also on knowing whether food businesses are maintaining good food hygiene.

The inspection of food retail and food services premises is a long-established component of public health efforts to protect the public against food-borne illnesses. Throughout NSW, consumers rely on council officers (Environmental Health Officers) to regulate and inspect retail food and food service businesses in order to ensure that hygiene standards are maintained. There is growing consumer demand seeking information on the level of hygiene compliance in a business. There is also a demand for transparency, consistency and accountability across all levels of government from industry, media and consumer advocates.

A series of articles and studies have indicated that public display of information on the hygiene standards of food businesses will help consumers exercise choice over where to eat and provide an incentive for food businesses to improve food safety standards.

Inspection disclosure schemes such as 'Scores on Doors' are potentially an effective means of informing consumers of the food safety performance of food businesses. The introduction of a 'Scores on Doors' scheme in NSW will attempt to simplify 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.

An increasing number of local councils in NSW have introduced or expressed an interest in developing a 'Scores on Doors' scheme within their own local government area. The Food Regulation Forum was concerned that there would be a proliferation of different schemes in NSW unless a single state-wide scheme were developed and consistently used. This could lead to confusion among both food businesses and consumers.

### 3.2 Anticipated benefits

A single state-wide scheme will ensure consistency of application and use, and easier interpretation, and is likely to deliver the following benefits:

- Improved consumer access to information about food safety performance.
- Additional 'market pressure' to improve compliance and regulatory consistency.
- Acknowledgement of well-performing businesses without further stigmatising poor performers.
- Improved food hygiene compliance in businesses and, as a result, reduction in risk factors that lead to foodborne illness in NSW.

### 3.3 Types of scheme

There are broadly two types of schemes in use around the world to display food inspection results. They are a 'Pass/Fail' scheme or a grading scheme.

#### ***Pass/Fail***

This scheme is a simple way of communicating the results of a food business inspection. It simply describes a business as being compliant or non-compliant with food safety and hygiene standards. It does not though indicate to consumers where ongoing intervention or enforcement activity is being undertaken, unless the business has 'failed' the inspection.

Table 1 on page 10 highlights the pros and cons of this scheme. A major constraint to a 'Pass/Fail' scheme being used as an inspection disclosure scheme is that consumers may be confused by what a 'Fail' card displayed means—should the business still be open and operating?

The pass/fail scheme is not commonly used. Consumer and business feedback on this type of scheme has been very negative in the areas where it has been introduced. The scheme does not provide any incentive for businesses to improve hygiene standards.

In a study in Hamilton, Ontario (Hensen et al. 2006) a municipality that initially used only 'Pass' and 'Fail' notices considered utilising a 'conditional pass' notice, but found that the additional 'conditional pass' option had a "significant and negative impact on survey respondents". Respondents did not understand the intent of the notice and would choose not to eat at those establishments.

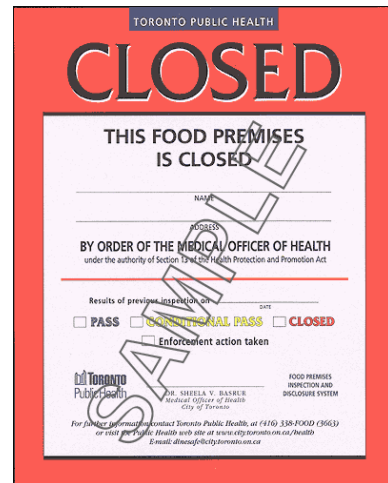
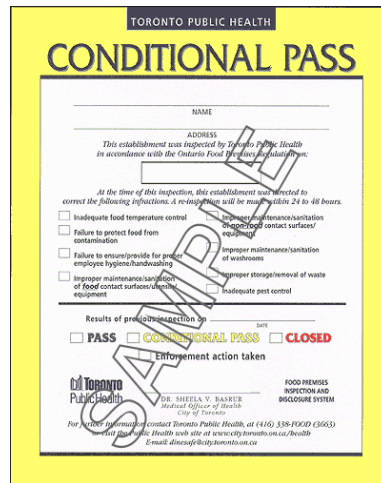
Other examples of information statements include the following:

- 'approved' or 'not approved'
- 'satisfactory', 'conditionally satisfactory', 'unsatisfactory'; and
- 'exceeds minimum standards', 'meets minimum standards' or 'does not meet minimum standards'

The city of Toronto, Canada (Anon 2001) commenced using a 'Pass/Fail' disclosure scheme with coloured cards to differentiate in a visual way, those businesses that passed inspections and those that 'failed'. For those businesses that 'failed', the business was closed until all problems were rectified. Toronto now requires food businesses to display their most recent inspection results in the main entrance of premises in the following format:

- green sign—pass
- yellow sign—conditional pass
- red sign—closed

which in effect modified a simple 'Pass/Fail' into more of a grade scheme.



During the development of the Toronto scheme, a literature review indicated that colour could be used to draw attention and suggested caution (Filion & Powell 2009). A similar scheme is used in Georgia, USA:

- green—general maintenance
- yellow—emerging hazard
- red—immediate hazard

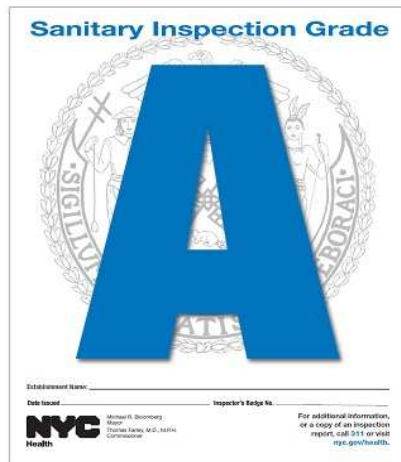
Columbus, Ohio, includes the green, yellow and red-coloured cards, with the addition of a white notice that is issued when an establishment is on probation and requires a follow-up inspection. The red card in this case is used when an establishment on probation failed re-inspection. Lexington-Fayette County in Kentucky uses a combination of numerical and colour disclosure schemes: scores of 85 and above as well as no 4- or 5-point violations will be posted in green; scores of 84 and under, or those with 4- or 5-point violations will be posted in red; and scores below 70 will be issued 'Notice of Intent to Suspend Permit'. These last examples again lead to more of a grading scheme being introduced.

### Grading scheme

Grading schemes provide incentives for food businesses to focus on food safety and hygiene and try to continually improve or maintain the highest rating. It can also be used as an internal training and education tool for workers and instil a culture of food safety and hygiene in a food business. Table 1 on page 10 highlights the pros and cons of grading schemes. There are a number of grading schemes that have been used or trialled internationally.

#### a. Letter grades

The California County of San Diego was one of the first regions in the USA to create a disclosure scheme to convey inspection results to the public, introducing letter grades to rate food businesses in 1947 (Filion & Powell 2009). LA County followed suit, and since 1996, has required food businesses to display the results of their most recent restaurant inspection in the form of an A, B or C letter grade. Several major US cities have adopted similar schemes, as have several states. New York City has recently (July 2010) implemented a letter grade scheme to disclose inspection results to the public. In Auckland, New Zealand, a food hygiene grade from A to E is assigned to inspected businesses, with the addition of a Gold A, which recognises food businesses that demonstrate safe practices above full compliance with food hygiene laws.



**b. Numerical scores**

The UK, through the UK Food Standards Agency has adopted a 6 tier numerical grading scheme (0-5 scale) for its food hygiene rating scheme. This was adopted in August 2010 following consultation with industry and consumers in the UK. The UK had over 200 different schemes in operation prior to national adoption of the standardised scheme.



In the USA it is common for the HACCP-based approach to restaurant inspection to be used. This categorises food businesses into high-, medium- and low-risk facilities. The FDA-approved 44- point list of violations assigns a weight based on their risk to human health. The highest possible score is 100, which is reduced when violations are cited. The final score is then displayed.

**c. Symbols**

Since 2001, the Danish Veterinary and Food Administration has used smiley faces as a means to disclose restaurant inspection results to the public:

- very happy smiley face—inspectors had no remarks
- happy smiley face—certain rules must be obeyed
- neutral face—an injunction or prohibition order has been given
- frowning face—enterprise has been fined, reported to police or approval withdrawn
- Elite-smiley—from 2008 a newly added Elite smiley may also be awarded when food businesses receive the happy smiley in four consecutive inspections.



Danish Veterinary and Food Administration  
**Inspection Report**

Establishment: Restaurant Testy  
Address: 117, Nørrebrogade  
Postal Code/City: 2200, Copenhagen N  
Cvst.no.: 8794321

This inspection, date: 02-01-2008  
Previous inspections:  
Date: 17-10-2007  
Date: 24-06-2007  
Date: 11-12-2006

| Inspected                           | Result |
|-------------------------------------|--------|
| Hygiene: Handling of food           | 1      |
| Cleaning                            | 1      |
| Maintenance                         | 1      |
| Clean-check system                  | 1      |
| Publication of Inspection Report    | 1      |
| Hygiene education                   | 1      |
| Labelling and information           | 1      |
| Approvals etc.                      | 1      |
| Operate according to D requirements | 1      |
| Food standards                      | 1      |
| Addresses etc.                      | 1      |
| Operational arrangements            | 1      |
| Packaging etc.                      | 1      |
| Other                               | 1      |

Comments from the official inspector:  
This inspection has reviewed:  
Hygiene: Cold storage, reception of goods, maintenance of freezing room. No remarks.  
Own-check system: Own-checks for December reviewed. No remarks.  
Publication of Inspection Report: Placement of Report in premises and website reviewed. No remarks.  
Labelling and information: Inspected that labelling on delicatessen is in Danish and not sold after "Best before" date. No remarks.  
Issued form on inspections in enterprises.

Regional Veterinary and Food Administration

More on food control and access to complain at [www.findsmiley.dk](http://www.findsmiley.dk)

Inspection results in the American state of Iowa are displayed using a 5-Star Program in which coloured stars assigned to businesses correspond with positive food handling behaviours observed during inspection:

- a yellow star is awarded when proper holding temperatures are respected
- a blue star for proper cooking
- a red star for clean equipment
- a brown star for good employee hygiene
- a green star when the establishment's food ingredients are received from safe sources

For each inspection, the restaurant's awarded stars are displayed online alongside the number of critical and total violations cited.

In the American state of Connecticut, Farmington Valley and the City of Norwalk respectively, waiter or lighthouse symbols are used to disclose inspection information:

- a score of 90–100 receives 3 waiters or lighthouses
- 80–89 receives 2
- below 80 receives 1

Other multi-level schemes include:

- Gold, Silver, Bronze
- Excellent, Very Good, Good
- star rating, \* = Good, \*\* = Very good, \*\*\* = Excellent. An example is the star rating scheme used by Brisbane City Council in its Eat Safe program.



- Two NSW local government areas (Canada Bay and Manly) are also using a type of star rated scheme. Their schemes include standard compliance and additional food safety management criteria.



Manly Food Safety Awareness Program Hygiene Rating System



**Table 1. Pros and cons of each scheme**

|                       | <b>Pros</b>  | <b>Cons</b>  |
|-----------------------|--|--|
| <b>Pass / Fail</b>    | Simple, clear message  | <p>Consumers may be confused about what a 'Fail' means i.e.:</p> <ul style="list-style-type: none"> <li>• if a 'failed' food business can stay open, consumers will wonder why it's open;</li> <li>• but if a 'Fail' means closure what's the point of the scheme?</li> </ul>  |
|                       | Less potential for EHO inconsistency due to fewer gradations   | <p>Does not recognise superior performance and thus does not provide:</p> <ul style="list-style-type: none"> <li>• minimal incentive for improved compliance</li> <li>• minimal opportunity for competitive advantage</li> <li>• less motivation for businesses to participate</li> <li>• no counterbalance to 'Name and Shame'</li> </ul> |
|                       | Less threatening for food business to sign up  | Does not recognise graduated regulatory approach to unacceptable performance, thus may lead to pressure to close all 'failed' businesses.  |
|                       | <b>Pros</b>  | <b>Cons</b>  |
| <b>Grading Scheme</b> | <p>Recognition of superior performance provides:</p> <ul style="list-style-type: none"> <li>• incentive to drive up compliance</li> <li>• opportunity for competitive advantage</li> <li>• motivation for businesses to participate</li> <li>• counterbalance to name and shame</li> </ul> | Consumers may not understand that a B or C score reflects acceptable compliance, thus unfairly disadvantaging these businesses if consumers avoid them   |
|                       | Provides consumers with a simple interpretation of inspection results (for example, in contrast to disclosure under FOI)   | Greater potential for EHO inconsistency due to more gradations   |
|                       | 'Grade Pending' score aligns with the current graduated regulatory approach to unacceptable performance, thus avoiding pressure to close such businesses in all cases.   | Business may be reticent to sign up due to fear of B and C grade (ie; receiving less than the top grade)   |

### **3.4 Outcomes of international 'Scores on Doors' evaluations**

Evaluations of various 'Scores on Doors' schemes have been conducted around the world with no single preferred scheme or combination of schemes.

However, there is evidence from some of these evaluations (USA, parts of Canada, Denmark, UK, New Zealand and Singapore) that 'Scores on Doors' schemes do achieve the goals of reducing foodborne illness and driving up standards of hygiene in food businesses. There is also evidence that consumer recognition and support for such schemes is growing.

A study by Irwin *et al* (1989) reported on the impact of routine restaurant inspections on prevention of foodborne illness in the Seattle-King County area, USA. This study reported that restaurants that did not have routine inspections were five to ten times more likely to have foodborne illness incidents than those that did and gained better results.

In Los Angeles, USA, a 20% decrease in food related hospitalisations has been reported since the introduction of its scheme in 1998 (Jin & Leslie 2003, 2005 & Simon 2005). Jin & Leslie offered two explanations as to why display of a hygiene grade (grade card) may improve health outcomes and reduce food-related hospitalisations.

Firstly, the grading outcomes actually improve hygiene standards in food businesses. Jin & Leslie (2003, 2005) note that the average inspection score for restaurants in the Los Angeles area increased by approximately 5% in the first year after introduction of the scheme. The increase in inspection scores was fairly rapid and is being maintained over time. The authors also report that the increase in average hygiene scores in restaurants occurred whether the grade scheme was adopted voluntarily or made mandatory.

Secondly, the authors note that this type of scheme gives consumers a basis to choose where to eat and that their patronage patterns drive a demand for restaurants with robust hygiene standards.

A revenue analysis was conducted by Jin & Leslie (2003, 2005) on restaurants and cafes in Los Angeles to see if grade cards could cause a change in revenue. This analysis suggests that restaurants and cafes may be affected economically from the display of a grade card. There was a positive impact for A and B graded restaurants. The average increase in revenue was 5.7% and 0.7% respectively for A and B graded businesses. Conversely, C graded business showed an average 1.0% revenue decrease.

There is evidence to support improved hygiene compliance in cities that have adopted a grade scheme. Data from New York shows an increase in compliance from 21% to 63% when a voluntary scheme was introduced in 2005 (Worsfold 2006). In July 2010, it became mandatory in New York for restaurants to publicly display letter grades (A, B, C). Evaluation of the first six months (Farley 2011) showed a distribution of 57.2% A grade, 30.2% B grade and 12.7% C grade among the 10,000 of 24,000 restaurants inspected under the program. 44% of the restaurants that scored a B grade in the first inspection improved to earn an A grade in the second inspection. For those that initially scored a C grade, 72% improved to earn an A or B grade.

Furthermore, there was a 20% increase in restaurant supervisors who completed the New York Health Department Food Protection Course during the six months, compared to the previous twelve-month period. This indicates how seriously food businesses are taking the introduction of the scheme.

Individual food businesses' reaction to the introduction of a 'Scores on Doors' scheme has been varied. Overall, the response has been positive. Surveys of business managers and owners in Denmark report that 8 out of 10 discussed hygiene practices with their staff before and after inspections and wanted to achieve the best result possible (Danish Veterinary & Food Administration 2008). Basrur (2003) reported that in Toronto, Canada, restaurants indicated that their goal was to improve hygiene and thus their inspection grade. 88% of businesses surveyed in the Sheffield City Council, UK (Sheffield City Council 2007), liked the idea of displaying a hygiene award grade. 81% of businesses in this council area said it encouraged them to improve their hygiene practices.

Many food businesses surveyed indicated that they did not want to post 'low' score or grading and would seek re-inspections to improve.

There is still some opposition by food businesses and their professional associations to 'Scores on Doors' schemes. There are concerns about inconsistency of food inspections, that the grade only represents a 'point in time', that data is lacking to show such schemes reduce foodborne illness, and that the schemes do not allow for quick recognition of business improvements and may foster negative attitudes by consumers.

Consumer feedback in international evaluations has supported 'Scores on Doors' schemes.

In Scotland, a UK Food Standards Agency survey (FSA Scotland 2006) found 82% of consumers were in favour of a scheme to provide inspection grades. 94% thought this information should be accessible online.

The UK Food Standards Agency (2010) in its biannual public attitudes tracker survey reported that consumer's judgement and awareness of hygiene standards in the places they ate at and purchased food was based on general appearance (65%), appearance of staff (51%) and reputation (42%). This shows that there is consumer interest in the hygiene standards of food businesses and the public actively uses the type of information 'Scores on Doors' schemes can provide.

In Toronto, 75% of consumers surveyed were aware of inspection information from the Dine Safe scheme being displayed at the food business. 95% said that they made dining decisions based on the coloured inspection display card displayed at the business. A further survey on the Toronto scheme (Basrur 2003) found 77% of consumers felt safer in making restaurant choices based on the grade displayed.

A survey by the Danish Veterinary & Food Administration (2008) found 97% of consumers thought the 'Smiley' display scheme was 'very good' or 'good'. The Denmark 'Smiley' has become one of the best known consumer public schemes in that country, with 59% of patrons to restaurants indicating that they have changed dinner plans after reviewing scores.

The Center for Science in the Public Interest, Washington, USA (2008) agrees that consumer confidence in eating out at restaurants is increased with a grade display.

### **3.5 Why the Authority chose a grading scheme**

The scheme piloted in NSW used a grading scheme and not a 'Pass/Fail', and was a result of research and consultation by the Authority over the previous 18 months. Even though there is no universally-agreed best method to communicate inspection results to the public, with many formats being used throughout the world (Filion & Powell 2009), research has suggested that multi level grading schemes provide businesses with an incentive to further progress and improve rather than a simple 'Pass/Fail' or 'Yes/No' award scheme.

The grading scheme piloted in NSW used a letter grade scorecard. The letter format was selected based on the experience in several countries including New Zealand and the USA (Filion pers com. 2010, Filion 2010) including testing through market research and focus groups of consumers and food businesses.

Food businesses participating in the 'Scores on Doors' Pilot were inspected using the standard Food Premises Assessment Report (FPAR). The FPAR was developed in consultation with NSW councils and is based on requirements of the Food Standards Code (FSC) Chapters 1 and 3. The FPAR is the foundation of the 'Scores on Doors' scheme and provides for consistency and transparency during the food inspection process. It enables businesses to be inspected and scored using the same criteria and questions no matter where they are located within the state.

The FPAR is divided into nine sections that relate to compliance with the hygiene and food safety requirements of the FSC. The FPAR focuses on the most important foodborne illness risk factors identified in numerous studies, including inadequate cooling and cold holding temperatures, food prepared ahead of planned service, inadequate hot holding temperatures, poor personal hygiene and infected (sick) food handlers, inadequate reheating and inadequate cleaning of equipment and premises.

The nine sections cover:

- General requirements
- Food handling controls
- Health and hygiene requirements
- Cleaning and sanitation
- Miscellaneous (temperature measurement, single use items)
- Animals and pests
- Design and construction of food premises
- Maintenance
- Labelling

Each section contains a number of questions that were phrased to provide answers of compliance or non-compliance. The questions were based on requirements of the FSC, but phrased based on *Safe Food Australia - A Guide to the Food Safety Standards*. Gathering information and data for each question at inspection relied on a number of factors including:

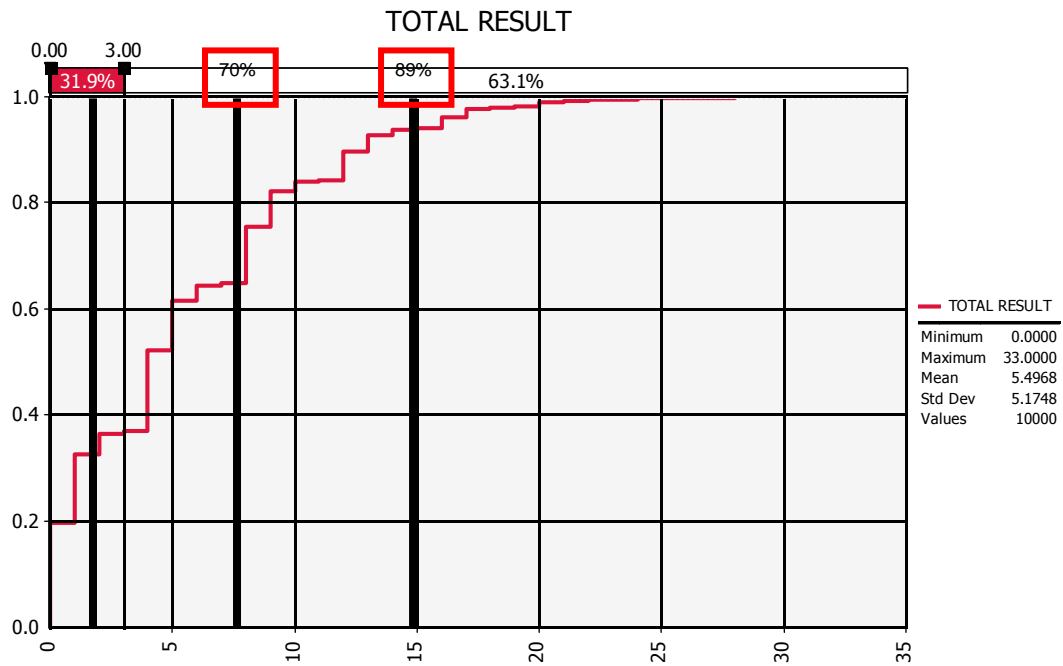
- observation by EHO
- time of inspection
- product or food risk
- inspection history of premises

The FPAR was designed to be used as a checklist of compliance and featured a scoring system from which a letter grade (A, B, C or P) was determined.

Prior to commencement of the Pilot, the scoring system to be applied during an inspection was simulated using a spreadsheet add-in program @RISK (version 5.0, @Risk, Palisade Corp.) a program that simulates outcomes from a series of activities with individual likelihoods. @RISK ran 10,000 simulations using the scoring weights allocated to each question within the FPAR and then estimated non-compliance rates for each, to get a snapshot of likely scores. The results, while not a perfect model of the overall scoring system, were very encouraging and gave a good basis for commencing the trial.

The @RISK simulation projected that approximately 30% of inspections would result in an 'A' grade being awarded, 40% awarded a 'B' and 10% a 'C'. The simulation projected an approximate 10% of food businesses inspected under this scheme would be awarded a 'P' grade (grade pending).

**Graph 1. @RISK model simulation results**



## What are the grades?

| Grade                     | Points | Definition   |
|---------------------------|--------|--|
| <b>A</b><br>EXCELLENT     | 0-3    | <b>Excellent</b> – the top grade means that you achieved the highest level of food safety standards.   |
| <b>B</b><br>GOOD          | 4-8    | <b>Good</b> – means you have good food safety practices. Some minor areas where standards were not met will need to be addressed.  |
| <b>C</b><br>ACCEPTABLE    | 9-15   | <b>Acceptable</b> – means you have an acceptable standard of food safety. A number of areas, although not serious, need to be corrected.   |
| <b>P</b><br>GRADE PENDING | 16+    | <b>Pending status</b> – means the business did not achieve an acceptable level of food safety performance in a number of areas. The business will be inspected again within three months to ensure the problems are rectified. |

**Scores on doors**  
**Food Safety Result**

**A**  
EXCELLENT

B GOOD  
C ACCEPTABLE  
P GRADE PENDING

Business Name \_\_\_\_\_  
Address \_\_\_\_\_  
Inspection Date \_\_\_\_\_ LOCAL COUNCIL LOGO TO GO HERE  
Expiry Date \_\_\_\_\_

© NSW Food Authority  
The NSW Food Authority is a government agency established under the Food Act 2003. It is responsible for the regulation and control of food safety in New South Wales. The NSW Food Authority is a government agency established under the Food Act 2003. It is responsible for the regulation and control of food safety in New South Wales.

**Scores on doors**  
**Food Safety Result**

**B**  
GOOD

A EXCELLENT  
B GOOD  
C ACCEPTABLE  
P GRADE PENDING

Business Name \_\_\_\_\_  
Address \_\_\_\_\_  
Inspection Date \_\_\_\_\_ LOCAL COUNCIL LOGO TO GO HERE  
Expiry Date \_\_\_\_\_

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**Scores on doors**  
**Food Safety Result**

**C**  
ACCEPTABLE

A EXCELLENT  
B GOOD  
C ACCEPTABLE  
P GRADE PENDING

Business Name \_\_\_\_\_  
Address \_\_\_\_\_  
Inspection Date \_\_\_\_\_ LOCAL COUNCIL LOGO TO GO HERE  
Expiry Date \_\_\_\_\_

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**Scores on doors**  
**Food Safety Result**

**P**  
GRADE PENDING

A EXCELLENT  
B GOOD  
C ACCEPTABLE  
P GRADE PENDING

Business Name \_\_\_\_\_  
Address \_\_\_\_\_  
Inspection Date \_\_\_\_\_ LOCAL COUNCIL LOGO TO GO HERE  
Expiry Date \_\_\_\_\_

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**Scores on doors**  
**PARTICIPANT**

Business Name \_\_\_\_\_  
Address \_\_\_\_\_  
Inspection Date \_\_\_\_\_ LOCAL COUNCIL LOGO TO GO HERE  
Expiry Date \_\_\_\_\_

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#### **4. Pilot methodology**

20 local government councils in NSW piloted the 'Scores on Doors' scheme, namely: Goulburn Mulwaree, Holroyd City, Tumbarumba Shire, Forbes Shire, Parkes Shire, Greater Taree, Kogarah City, Ashfield, Randwick City, Parramatta City, Upper Hunter Shire, Newcastle City, Penrith, Blacktown City, City of Sydney, Mosman, Warringah, Waverly, Cessnock, and Wyong Shire Council. The Pilot ran from 1 July to 31 December 2010. Each local council wrote to their medium and high risk retail food service businesses that process and sell unpackaged, ready-to-eat potentially hazardous (i.e. requires temperature control) food for immediate consumption.

Those businesses included restaurants, cafés, takeaway shops, bakeries, pubs, hotels and clubs. Examples of businesses not intended to be covered by the Scheme include supermarkets, delicatessens, service stations, butchers, green grocers, temporary markets, mobile food vending vehicles, and premises licensed by the NSW Food Authority.

Food businesses received a fact sheet about the scheme, a copy of the Food Premises Assessment Report (FPAR) used by council EHOs during inspections, and consumer cards with 'Scores on Doors' information to display for their customers. In addition there was local media activity at the time, including radio advertisements and press articles.

Each business that wanted to volunteer to participate was asked to sign a written agreement with the council. The Agreement outlined the roles and responsibilities of each party during the six month pilot.

Participating businesses were inspected by council EHOs using the FPAR and associated scoring scheme. The results of the inspection determined a score and a grade for the food business.

Businesses were issued with a scorecard 'A', 'B', 'C' or 'P' related to their inspection score. Those businesses awaiting inspection displayed a temporary scorecard ('participant'). Under the signed agreement businesses were obliged to display the scorecard prominently in the outlet (preferably on the front door or window) until the next routine inspection. A review process was available to food businesses if they wished to appeal the score and grade.

#### **5. Evaluation of the Pilot in NSW**

A comprehensive methodology was used, combining both quantitative and qualitative approaches, and covering all key audience types, i.e. hospitality industry associations, the businesses participating in the Pilot, consumer advocates, consumers living and/or working in those Pilot areas, key representatives from the 20 councils participating in the Pilot, and the Food Regulation Forum. The evaluation generated qualitative and quantitative responses to the scheme through consultation meetings with the Hospitality Industry Working Group and survey questions:

- 50 x 15 minute face-to-face or telephone interviews by council environmental officers with participating food businesses to acquire more open-ended feedback
- two consumer focus group sessions by an independent social researcher (TNS Research) to (i) quantitatively gauge the level of consumer awareness and usage of scheme and (ii) gain quantitative and qualitative reactions to Pilot certificates/scheme
- 300 postal surveys completed by consumers living and/or working in the pilot areas that had eaten at a participating business
- consultation with CHOICE (consumer advocates)

- a series of workshops/teleconferences with councils operating 'Scores on Doors' to acquire their subjective feedback on the aims, design, impact and experience of scheme
- online questionnaires via survey monkey for councils operating 'Scores on Doors' to indicate their aims, the design of the scheme, impact on the council and their opinion of the scheme
- an assessment of hygiene inspection data provided by councils from before and after certification, along with the inspector's judgement of change in standards and observation of certificate display
- consultation meetings with the Food Regulation Forum and Retail and Food Service Industry Advisory Group

The evaluation was conducted between December 2010 and February 2011.

## **6. Main findings**

### **6.1 Consumer attitudes and feedback**

#### **6.1.1 Consumer focus groups**

The Authority commissioned an independent social research company, TNS Social Research, to undertake consumer research to evaluate consumer understanding and feedback of the Pilot. TNS undertook this research by conducting two focus group discussions. The number of participants in each focus group ranged from 6 to 8 individuals, and each session was between 1.5 to 2 hours in duration. The sample size was designed to provide a reasonable level of statistical power and confidence. The consumer groups were recruited to comprise a mix of males and females from the general community, aged 18+ years. To ensure relevance of the conversation, only those displaying some familiarity with the program were invited to participate in the research. Respondents were drawn from a mix of participating council areas.

The aim of the focus groups was to assess the success of the Pilot and to determine what improvements could be made to the future program when it is rolled out state-wide.

The questions posed in the focus groups are summarised below:

- what information on the 'Scores on Doors' scheme is required by consumers
- what was the reaction and behaviour of consumers and businesses to different information and presentation formats
- how best to encourage businesses to participate during the Pilot
- where and how grades could best be displayed
- what are the scope of the issues incorporated into the 'Scores on Doors' scheme and how best to communicate this to both businesses and consumers

The results of the focus groups conducted by TNS follow. The full TNS report is available in Appendix 1.

Overall there was a favourable reaction from both focus groups for the 'Scores on Doors' scheme, both groups agreeing it is a positive initiative that would benefit both consumers and food businesses.

There was a general preference for the scheme to be mandatory in order to enhance the credibility of, and participation in, the program. The concerns about a voluntary scheme related to potential lack of take-up by food businesses and limited accountability if the scheme were not comprehensively implemented.

Respondents were required to evaluate different grading formats, for example by replacing the piloted display format (letters) with stars. Group one had some preference for stars (as letters in current form leave room for confusion). Group two preferred letters (as stars are too similar to food rating/accommodation grading schemes).

Although the star grading scheme was not consistently preferred over the letter grading scheme, when presented with the option of solid stars only versus solid stars plus star outlines, both groups opted for stars with outlines. The primary reason for this was that it made it easier to quickly count the score out of 5 and understand the range.

When exposed to the current versus proposed wording describing the various grades, both groups expressed a preference for the current wording, while acknowledging that the proposed wording was more likely to encourage business participation in the program.

|          | <b>Pilot wording</b> | <b>Proposed new wording</b> |
|----------|----------------------|-----------------------------|
| <b>A</b> | Excellent            | Excellent                   |
| <b>B</b> | Good                 | Very good                   |
| <b>C</b> | Acceptable           | Good                        |
| <b>P</b> | Grade pending        |                             |

There was some confusion and debate about the real meaning of a P grade. Respondents were unclear as to whether it meant failed, pending inspection or pending outcome of inspection.

i.e.: P = Pass, Poor, Pending, Pending decision or final grading.

However, the general consensus was that it was likely to impact negatively on consumers propensity to visit the respective outlet.

Most would approach it with caution and enter only to purchase non-perishables or if there were no other option in close proximity. Others would compromise, and give the outlet the benefit of the doubt, especially if a local favourite. It would also depend on what type of outlet it was. Respondents were less likely to compromise if the outlet in question was expensive.

The groups were responsive to the idea of obtaining food outlet grades online. If this option were available, there was preference for this to be via a central website rather than on local council sites, although some suggested offering both.

There were further suggestions of incorporating sophisticated search engines, linking up with related sites such as Eatability and Google maps, and offering multiple search variables. Some within the groups also suggested offering interactive opportunities such as allowing consumers to update details or report extreme cases.

There was a request for more publicity and promotion of the program to increase public awareness and participation. In addition to word of mouth, local media was seen as an effective means to achieve this.

### **6.1.2 Consumer postal and online surveys**

A postal survey for consumers to complete was distributed to those food businesses participating in the Pilot. This survey was also made available via an online survey on the Authority's website for consumers to provide feedback. The surveys sought responses from consumers who had eaten at participating businesses on their opinions and recognition of the 'Scores on Doors' Pilot.

292 responses were received. Overall opinions of the Pilot were very positive. The vast majority of respondents thought 'Scores on Doors' would be useful and if grades were displayed by more businesses in NSW, they would use them to help make decisions about where to eat.

The survey questionnaire and results are provided at Appendix 2.

A summary of responses to the survey questions follows:

- 44% of consumers surveyed claim to have used 'Scores on Doors' to make a decision on where to eat. 27% answered "No" to this question and 25% claim to have not noticed the scorecard display on entry.
- 83% of consumers surveyed are likely to use 'Scores on Doors' to make a decision about where to eat in the future
- 76% preferred a star grading format as that which best displays the standard of food safety in food businesses. 24% preferred the letter grading format.
- 39% of consumers understood a 'C' grade to mean that the business isn't perfect and that might affect my decision to eat there. 21% indicated that the business might not be perfect, but would still feel comfortable about eating at that business.
- 8% of consumers indicated they would only eat at 'A' graded businesses with a further 31% indicating they would only eat at an 'A' or 'B' graded business.
- 88% of consumers indicated they would not eat or be worried about eating somewhere that had a 'P' grade displayed. Only 8% of consumers indicated that they understood a 'P' grade for a business to not yet be acceptable, requiring re-inspection. The business might not be perfect, but they would still feel comfortable about eating there.
- 80% found the information cards on the 'Scores on Doors' Pilot that were displayed on the front counters of participating businesses to be informative and/or interesting.
- 38% would like to see grades available online through a central website, while a further 27% would like the opportunity to search for grades on a local council website. 30% claim they would not look online for grades.

Although not prompted, a few consumers spontaneously suggested that the 'Scores on Doors' scheme should be made mandatory for it to be effective.

## **6.2 Food industry outcomes, attitudes and feedback**

### **6.2.1 Hospitality Industry Working Group**

A Hospitality Industry Working Group (HIWG) was established to seek input and discuss issues on 'Scores on Doors' schemes and the Pilot conducted by the Authority. The HIWG met on 5 occasions during and after the Pilot.

The HIWG comprised representatives from peak food and hospitality associations and food retailers and major a 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 major issues considered by the working group were:

- Discussion on the two broad types of 'Scores on Doors' scheme options available—'Pass/Fail' scheme or a 'grading' scheme. This included:
  - the pros and cons of 'Pass/Fail' and 'grading' schemes
  - if a 'grading' scheme was favoured, then what was the preferred and most positive design and display for food businesses, for example:
    - the use of symbols, letters or numerals
    - use of word descriptors
    - the design of the scorecard to be displayed
    - the inclusion of the "P" grading used in the trial
- Potential for the 'Scores on Doors' scheme be a positive counterbalance to the existing 'Name & Shame' scheme.
- Whether the scheme should be voluntary or mandatory.
- Whether supermarkets should be included in the scheme.
- Use of the "Scores on Doors Participation Agreement" for businesses signing up for the scheme.
- Content of the Food Premises Assessment Report (FPAR).
- Concerns of increased 'compliance costs' for a food business in achieving a high grade. The HIWG noted that food businesses would not be interested in participating in a voluntary scheme if the cost of preparing a business to obtain a high grade was too high.
- Whether businesses would be able to request a re-inspection with payment of an appropriate fee to council.
- The need for a communication strategy for food businesses to foster awareness and understanding of the scheme and how it would operate.
- How the Pilot should be evaluated and opportunities for the group to discuss the evaluation outcomes.

There was substantial consensus to support the introduction of a 'Scores on Doors' scheme based on:

- Reliance on the existing inspection regime, therefore not adding to cost or requiring additional or separate inspections
- Use of a 3 tier grading scheme
- Representation of grades by a star symbol (i.e. 5 stars, 4 stars, 3 stars)
- Use of positive word descriptors to describe the stars i.e. 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 frightening" for food businesses to sign and understand
- The scheme being voluntary, based on support and promotion by industry associations
- Ability for the scheme to be adopted nationally

The AHA had reservations regarding the adoption of a grading scheme, preferring a 'Pass/Fail' scheme. The AHA Board confirmed it was opposed to a grading scheme, whether it be numerical, letters or symbols. It also opposed any wording. The AHA Board indicated a preference for a "tick" scheme (similar to the Heart Foundation Tick) as a positive message for compliance with food safety standards. The AHA does not support a national scheme. If any scheme was to be adopted, it should be voluntary and a NSW only scheme.

The supermarket and national retail sector emphasised their preference to remain excluded from the scope of the scheme. Supermarkets were not included in the Pilot as they were not considered to be significant providers of ready-to-eat food for immediate consumption. There also appears to be little consumer interest in including supermarkets in the proposed scheme in the future. Supermarkets, like any food business, must still comply with the Food Standards Code. It was noted, however, that some supermarkets are trialling café type sections. If this becomes a major trend, the case for supermarkets not to participate would be less strong.

### 6.2.2 Participating food businesses

A total of 266 food businesses participated in the Pilot. The breakdown of business type is shown in Table 2.

**Table 2. Number of participating businesses by business type**

| <b>Business type</b> | <b>Number businesses signed</b> |
|----------------------|---------------------------------|
| Restaurant           | 94                              |
| Café                 | 45                              |
| Pub                  | 7                               |
| Club                 | 13                              |
| Hotel                | 2                               |
| Bakery               | 12                              |
| Takeaway shop        | 93                              |
| <b>Total</b>         | <b>266</b>                      |

The major issues raised by participating businesses were:

- Concerns that the scheme would add to compliance costs for their business
- The need for consistency of inspection outcomes
- That many of the businesses found the "Scores on Doors Participation Agreement" daunting and they were hesitant to sign
- That some businesses would have participated in the Pilot if they had had an opportunity to know their final grade score prior to signing the Agreement
- How businesses could use the grade as a marketing tool
- Businesses were wary of displaying a perceived 'low' score (i.e. would be wary of displaying a 'C' grade)
- A lack of understanding of the 'P' (pending) Grade score
- The need for a comprehensive communication package to increase awareness and understanding of the scheme

The overall opinions of food businesses who participated in the Pilot were positive:

- 93% indicated they would continue with the scheme after the Pilot

- 82% believe that participation in a 'Scores on Doors' scheme will help to raise awareness of food safety standards within their business and be a positive reinforcement for staff attitude and behaviour
- 100% of respondents were happy with the information material (fact sheets, guidelines, consumer cards) provided to explain the Pilot
- 86% indicated they would be willing to pay for a re-inspection ahead of the next scheduled inspection if they received a poor score and had taken measures to rectify breaches found
- 57% prefer the star grading format as the best display of the standard of food safety and hygiene in their business
- There was a preference for the scheme to be voluntary, however there was request by other businesses for the scheme to be mandatory.

The survey questionnaire and results are provided at Appendix 3.

### 6.3 Local government outcomes and feedback

Overall there was a positive response to the scheme from the councils who participated in the Pilot, the council Regional Food Groups, and the Food Regulation Forum.

One council participating in the Pilot indicated that they will not be proceeding with the 'Scores on Doors' scheme after the conclusion of the Pilot. However, a number of additional councils have expressed interest in adopting the scheme once it is reviewed and relaunched in 2011.

These groups recognised the benefits of a uniform food business inspection checklist and guidelines being used across NSW to improve consistency and interpretation of inspections. The 'Scores on Doors' Pilot has helped enable the development, road testing and adoption of these standardised documents.

#### 6.3.1 Pilot council participation

Local councils participating in the 'Scores on Doors' Pilot were positive about the outcomes of the Pilot. 20 councils participated in the Pilot.

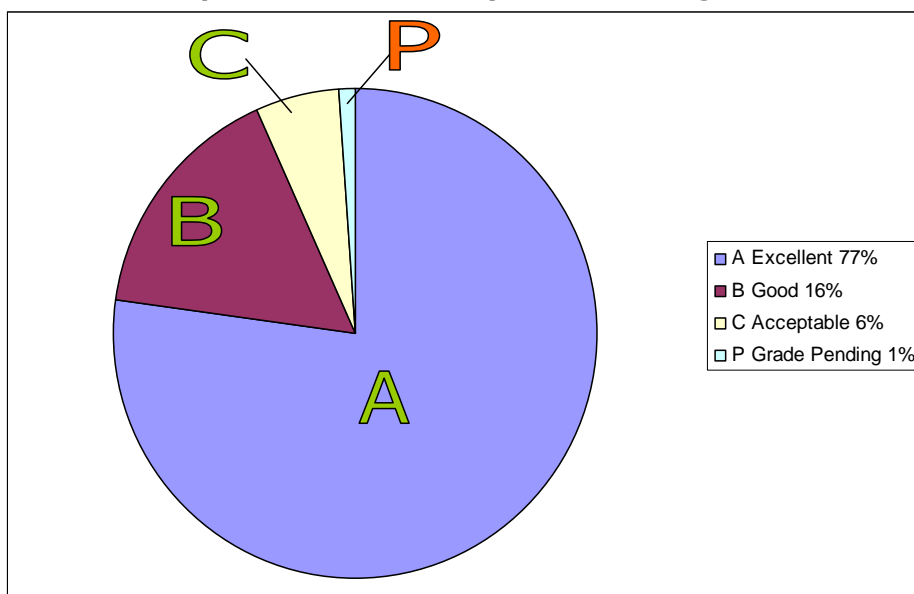
Table 3 shows the spread of grades issued by councils during the Pilot.

**Table 3. Spread of grades by business type during Pilot**

| Business type | No. of businesses inspected | Results    |           |           |          |
|---------------|-----------------------------|------------|-----------|-----------|----------|
|               |                             | A          | B         | C         | P        |
| Restaurant    | 78                          | 56         | 12        | 8         | 1        |
| Café          | 37                          | 33         | 5         |           |          |
| Pub           | 4                           | 4          |           |           |          |
| Club          | 10                          | 8          | 2         |           |          |
| Hotel         | 2                           | 2          |           |           |          |
| Bakery        | 12                          | 11         | 1         |           |          |
| Takeaway shop | 88                          | 65         | 17        | 5         | 1        |
| <b>Total</b>  | <b>231</b>                  | <b>179</b> | <b>37</b> | <b>13</b> | <b>2</b> |

*(NB. 35 businesses signed had not been inspected during Pilot period)*

**Graph 1. Grades issued by councils during Pilot**



Five teleconferences were held with participating councils during the Pilot.

The major issues raised and discussed by councils in these meetings were:

- Signing up of food businesses was slow in some areas due to initial wariness of the scheme by some businesses. Most of the initial businesses to sign up knew they were of a standard to receive an 'A' grade.
- Some councils indicated that the Agreement was viewed by some businesses as a bit daunting. Most councils however attributed any slow sign up rate as being due to businesses not wanting a B or C grade. Councils felt the 'C' grade was not that well accepted by businesses, although it was perceived as a pass for food safety compliance.
- The use of FPAR as a template checklist was viewed favourably by those councils participating in the Pilot. The Authority and councils will look to further trial the use of the FPAR across NSW from July 2011 to June 2012 after which time it will be reviewed. Some councils have already signalled that they will adopt the FPAR for their use. The FPAR was revised and improved during the Pilot as a result of feedback received from participating councils. Score allocation for breaches of individual questions on the FPAR was also revised as a result of feedback and discussion to better reflect the nature of the breach.
- Anecdotal evidence that proprietors are happy with the assessment report and explanatory notes.
- The inspection process took up to 15-20 minutes longer due to increased thoroughness by officers and initial non-familiarity with the FPAR.
- The proposed scoring scheme did not raise any major issues or anomalies and positively reflected the food safety and hygiene standard of the business being inspected. In general the inspections completed resulted in the final scores/grades being as per the officers' expectations.
- Councils commented that the Frequently Asked Questions (FAQ) document complemented the FPAR and provided assistance with interpretation of inspection findings. The document will be updated throughout the course of the Pilot and into the future and is aimed at giving EHO's and participating businesses additional guidance on the consistent interpretation and use of the food premises assessment report.



- In general, a majority of councils participating in the Pilot have indicated that they felt a star rating model would be viewed more positively than a letter grading scheme. There was also concern about the interpretation of the 'P' grading.
- A general consensus among participating councils that the word descriptors 'excellent', 'very good' and 'good' were acceptable. However, there was good support for the use of the words used in the Pilot 'excellent', 'good' and 'acceptable'. There was concern that the level of hygiene in a food business be adequately described by the word descriptors.
- The rationale for the award of a "3 star/good" grade means that the non compliances identified do not require further intervention from the EHO until the next routine inspection. If the inspection outcome requires enforcement action (eg: improvement notice, penalty infringement notice etc) or identifies a 'critical' breach, eligibility criteria have been developed where no grade is awarded, irrespective of the final score. Enforcement action is defined in the criteria as issuing of an improvement notice, or penalty notice, or prohibition order, or seizure notice or prosecution.
- In general councils felt that the option of re-grading inspections on a cost-recovery basis would be a positive step. However, some councils emphasised that the offer of a re-grade inspection to businesses would depend on resource availability.
- General support for the scheme being introduced state-wide with council participation to be voluntary.
- The development of recommendations for criteria for businesses to be eligible to display a grade, as a result of an inspection.

### **6.3.2 Food Regulation Forum**

The Food Regulation Forum (FRF) consists of representatives from the Local Government and Shires Associations (LGSA), the Local Government Managers Australia (LGMA), the Development & Environmental Professionals Association (DEPA), and Environmental Health Australia (NSW) (EHA).

The FRF supported the development and piloting of a 'Scores on Doors' model in March 2010. The FRF agreed that the NSW Food Authority should now trial a state-wide model for voluntary use by councils across NSW, in consultation with local government and the retail and food service industry.

The major issues raised by the FRF were:

- The FRF was concerned that unless a single state-wide scheme was developed and consistently used, there would be a proliferation of different schemes operating in NSW creating confusion for businesses and consumers.
- Councils should be able to voluntarily opt to participate depending on resource availability and challenges for smaller rural or regional councils where there may be little demand for such a scheme.
- That the scheme complements existing initiatives to provide a comprehensive and balanced package of regulatory, training and risk management strategies for the NSW food service sector.

## Conclusion

The Pilot initiated debate and discussion on all issues relating to the proposed scheme.

Overall, there was agreement on the anticipated benefits of adopting a 'Scores on Doors' scheme state-wide. However, it must be acknowledged that there were some differences of opinion and some feedback that did not support the proposed model.

The Authority believes it has taken on board all feedback and made changes to the pilot scheme to satisfy majority views.

There was strong support from all areas that a single scheme be introduced state-wide to ensure uniformity and consistency. There is a need to ensure that there is consistency and fairness in scoring and that there is an adequate and transparent review process available to businesses.

The food industry and local government sectors support voluntary participation of councils and food businesses in a 'Scores on Doors' scheme. Consumer feedback indicated a general preference for a scheme to be mandatory in order to enhance the credibility and engagement by business with a scheme.

A voluntary scheme will allow the scheme to grow by genuine industry and consumer demand. The industry could utilise it as a marketing tool to increase patronage and revenue. This could lead to increased competition among local food businesses. This could then lead to improvement in hygiene compliance and perhaps encourage a positive 'cultural' change within businesses in terms of improved workplace attitudes to food safety and hygiene.

The benefits of making a scheme mandatory are uncertain. A mandatory scheme would require the introduction of new legislation that would not be supported by the food industry or local government. A mandatory scheme may increase costs of compliance for food businesses for no extra return. It may add to the burden on council resources, especially in regional/remote areas where there is little consumer or food business demand for a scheme. It is uncertain whether a mandatory scheme would achieve higher levels of compliance compared to a voluntary scheme as it could be seen as adding further regulatory burden and not encourage business to improve hygiene standards.

The cornerstone for the proposed scheme is the use of the standardised FPAR, including a scoring system and guidelines for inspection. The use of a standard certificate to display the grade was supported. Many councils use food inspections as a means of providing continuing education and advice to food businesses. This promotes a positive engagement with the business and further ensures consistency in interpretation of inspection outcomes. This is acknowledged as a very important role for councils and it should be encouraged.

One of the greatest areas for discussion was on the representation of grades. Different groups preferred different representation formats. The food industry favoured the use of star symbols. Both consumers and local government representatives were more closely split on their preference for stars or letters. However, both groups overall preferred stars to letters.

All groups preferred to use a word descriptor to describe the star grades. The importance of the interpretation of the word descriptors was raised by all sectors in feedback. Again there was a split between the word descriptors used in the Pilot and an alternative option. There was greater support for use of the alternative option words 'excellent', 'very good' and 'good' to describe the star grades. It was noted that word descriptors were viewed as an incentive for continuous improvement by food businesses.

Feedback also led to development of criteria for businesses to be eligible to display a grade. Enforcement action as a result of an inspection, and/or the awarding of a 'critical' breach score will automatically deem a business ineligible to display a grade, regardless of the score, for the scheme for that inspection (Appendix 7).

The 'P' grade display was not well received by all groups. Its meaning was not well understood and there was a preference to delete it from the grading system. The "Participant" display certificate was also not well received by all groups.

Based on the research conducted, the Authority should consider increasing consumer awareness of the scheme. This includes communication messages and programs to Culturally and Linguistically Diverse (CALD) groups. Although consumer awareness is likely to grow over time via word of mouth and from seeing the scorecards being displayed, there is a need to raise public awareness in the short term through increased advertising and publicity.

Increased awareness will, in turn, put pressure on businesses to comply with food hygiene regulations and to display their certificates. Greater communication and education of food businesses is also required. The more a food business understands the basis of the scheme and its operation, the more engaged they should be. One of the objectives of introducing the scheme is to encourage food businesses to participate and positively change the food safety and hygiene culture within their businesses. This could then lead to improved compliance rates at inspection and lessen the factors that cause foodborne illness.

A set of recommendations is provided to deliver a scheme package that best addresses all the concerns expressed. Given the wide range of issues and viewpoints revealed by the evaluation, it is proposed that the next step be a state-wide trial for 12 months, followed by a review.

## Recommendations

1. The 'Scores on Doors' scheme should be introduced as a state-wide model for voluntary implementation by councils across NSW and voluntary participation by food businesses. The model should be trialed for a 12 month period. It should be aimed at medium to high risk retail and food service businesses that process and sell food that is ready-to-eat, potentially hazardous (i.e. requires temperature control), and for immediate consumption.
2. Participation in the 'Scores on Doors' scheme should be via a written agreement between a participating council and each participating food business that:
  - a. defines council and business obligations under the scheme;
  - b. enables a business to request the council to review its grade; and
  - c. provides termination conditions.

The agreement used for the Pilot should be revised to reflect the recommendations in this evaluation report and streamlined to the extent possible (Appendix 4).

3. The 'Scores on Doors' scheme should have the following features:
  - a. Reliance on the existing inspection regime, therefore not adding to cost or requiring additional or separate inspections
  - b. Use of a three tier grading scheme
  - c. Representation of grades by a star symbol (i.e. 5 stars, 4 stars, 3 stars)
  - d. Use of word descriptors to describe the star grades (i.e. 5 stars—*excellent*, 4 stars—*very good*, 3 stars—*good*)
  - e. Calculation of the grade from the results of an inspection conducted by an 'authorised officer' of an appointed 'enforcement agency' (in most cases, a council Environmental Health Officer) using the standardised checklist and scoring template (Food Premises Assessment Report (FPAR)), that was developed for the Pilot (Appendix 5).
  - f. Option for a food business to seek a review of its grade within 7 days of receiving the scorecard
  - g. Option for a food business to seek a re-assessment inspection from the appointed enforcement agency (in most cases the council Environmental Health Officer) for the usual inspection fee, where it is offered by the council (policy and resources)
  - h. Use of a standard certificate to display the grade in a conspicuous location near the entry of the business. Certificate to state that it records a food safety result and include the name of the food business, business address, inspection date, expiry date and issuing council (Appendix 6).
  - i. Participation in the scheme will be voluntary for both council and food businesses.
4. Use of the 'P' grading and "Participant" display should be discontinued.
5. Development of criteria to be applied for businesses to be eligible to display the grade obtained during an inspection. Any enforcement action undertaken, or award of a 'critical' breach will automatically deem a business ineligible to display a grade for that inspection (Appendix 7).

6. The Authority should develop a communication strategy, including communication packages targeting councils, food businesses/associations and consumers, to ensure stakeholder awareness and understanding of the scheme and how it will operate.
7. The scheme should be reviewed after the 12 month trial in consultation with stakeholders. The review should include consideration of:
  - extent of council and business participation in the scheme and the reasons for non-participation
  - consumer and community feedback on the initiative
  - whether and how website publication of state-wide 'Scores on Doors' results should be developed and maintained
  - whether the scheme is consistent with other 'Scores on Doors' initiatives elsewhere in Australia and, if not, how its alignment could be improved
  - development of a system that recognises and rewards food businesses that achieve a five star grading in consecutive inspections

## Draft proposed grade display



Business name \_\_\_\_\_  
 Address \_\_\_\_\_  
 Inspection date \_\_\_\_\_ Expiry date \_\_\_\_\_  
 Issuing council \_\_\_\_\_



© NSW Food Authority  
 The grading presented on the statement of the premises is a rating based on a food safety assessment carried out by an authorised officer of council on the date indicated. The grading is given in good faith and is intended as a general guide only. The standard for the rating is the general standard of the rating. The standard relates to representation, open to inspection and will not be held for any negligent act or omission in connection with the rating, the condition of the premises, the quality of food or food safety standards of the food business on the date indicated or at any time in the future.



Business name \_\_\_\_\_  
 Address \_\_\_\_\_  
 Inspection date \_\_\_\_\_ Expiry date \_\_\_\_\_  
 Issuing council \_\_\_\_\_



© NSW Food Authority  
 The grading presented on the statement of the premises is a rating based on a food safety assessment carried out by an authorised officer of council on the date indicated. The grading is given in good faith and is intended as a general guide only. The standard for the rating is the general standard of the rating. The standard relates to representation, open to inspection and will not be held for any negligent act or omission in connection with the rating, the condition of the premises, the quality of food or food safety standards of the food business on the date indicated or at any time in the future.



Business name \_\_\_\_\_  
 Address \_\_\_\_\_  
 Inspection date \_\_\_\_\_ Expiry date \_\_\_\_\_  
 Issuing council \_\_\_\_\_



© NSW Food Authority  
 The grading presented on the statement of the premises is a rating based on a food safety assessment carried out by an authorised officer of council on the date indicated. The grading is given in good faith and is intended as a general guide only. The standard for the rating is the general standard of the rating. The standard relates to representation, open to inspection and will not be held for any negligent act or omission in connection with the rating, the condition of the premises, the quality of food or food safety standards of the food business on the date indicated or at any time in the future.

# Draft proposed Food Premises Assessment Report (FPAR)

## [DRAFT] Food Premises Assessment Report

FPAR V.2, 04/11



|                        |  |                 |  |
|------------------------|--|-----------------|--|
| Trading name           |  | ABN/ACN         |  |
| Person interviewed     |  | Date/time       |  |
| Proprietor/company     |  | Phone           |  |
| Address                |  | Ref no.         |  |
| Food Safety Supervisor |  | Cert no.        |  |
| Email                  |  | Inspection type |  |

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

NB: Assessment report contains findings from date/time of inspection only

## References

1. Anon. 2001. Toronto's DineSafe Program. <http://www.toronto.ca/health/dinesafe/overview.htm> (accessed 21 May 2010)
2. Anon. 2009. Food Safety and Foodborne Illness in Toronto [http://www.toronto.ca/health/moh/pdf/staffreport\\_april15\\_2009.pdf](http://www.toronto.ca/health/moh/pdf/staffreport_april15_2009.pdf) (accessed 20 May 2010).
3. Basrur, S. 2003. Food premises inspection and disclosure systems evaluation report. [http://app.toronto.ca/food2/pdf/food\\_safety\\_evaluation.pdf](http://app.toronto.ca/food2/pdf/food_safety_evaluation.pdf) (accessed 13 October 2010).
4. County of Los Angeles Public Health. 2007. Retail food inspection guide. <http://www.lapublichealth.org/eh/docs/RetailFoodInspectionGuideV2007.pdf> (accessed 20 May 2010).
5. Danish Veterinary and Food Administration. 2008. Danish smileys get a broader smile. [http://www.fvm.dk/News\\_display.aspx?ID=18488&PID=169628&year=2009&NewsID=5570](http://www.fvm.dk/News_display.aspx?ID=18488&PID=169628&year=2009&NewsID=5570) (accessed 13 May 2010).
6. Douglas, L. 2011. Evaluation of scores on doors pilot program. *Report prepared for NSW Food Authority by TNS Social Research.*
7. Farley, T. New York City Department Health & Mental Hygiene. 2011. Restaurant letter grading: the first six months. <http://www.nyc.gov/html/doh/downloads/pdf/rii/restaurant-grading-6-month-report.pdf> (accessed 20 February 2011).
8. Filion, K. and D.A. Powell. 2009. The use of restaurant inspection disclosure schemes as a means of communicating food safety information. *J. Foodservice.* 20:287-297.
9. Filion, K. 2010. Designing a national restaurant inspection disclosure system for New Zealand. <http://krex.k-state.edu/dspace/bitstream/2097/6957/3/KatieFilion2010.pdf> (accessed 10 January 2011).
10. Food Standards Agency. 2008. UK-wide 'Scores on the Doors' scheme on hygiene standards in food businesses – Summary of consultation responses. <http://www.food.gov.uk/multimedia/pdfs/consultationresponse/sotdresponses.pdf>
11. Food Standards Agency. 2011. Biannual public attitudes tracker survey. <http://www.food.gov.uk/science/socsci/surveys/publictrackingsurvey> (accessed 3 March 2011).
12. Hensen, S., S. Majowicz, O. Masakure, P. Sockett, A. Jones, R. Hart, D. Carr and L. Knowles. 2006. Consumer assessment of the safety of restaurants: The role of inspection notices and other information cues. *Journal of Food Safety* 26:275-301.
13. Irwin, K., J. Ballard, J. Grendon and J. Kobayashi. 1989. Results of routine restaurant inspections can predict outbreaks of foodborne illness: The Seattle-King County experience. *American J. Public Health.* 79 (5):586-590.
14. NSF.CMI. 2008. 'Scores on Doors': A threat or an opportunity. <http://www.nsf-cmi.com/publications/scores%20on%20the%20doors%20nsf-mi%20briefing%20document.pdf> (accessed 25 May 2010)



15. Pham, M.T., A.Q. Jones, J.M. Sargeant, B.J. Marshall and C.E. Dewey. 2010. A qualitative exploration of the perceptions and information needs of public health inspectors responsible for food safety. *BMC Public Health*. 10:345-353.  
<http://www.biomedcentral.com/content/pdf/1471-2458-10-345.pdf> (accessed 13 October 2010).
16. Scotland Food Standards Agency. 2006. Eat Safe Award Scheme (Scotland) Evaluation Summary Report. <http://www.food.gov.uk/multimedia/pdfs/eatsafescotevaluation.pdf> (accessed 20 May 2010).
17. Sheffield City Council. 2007. Food hygiene scores on the doors.  
<http://www.sheffield.gov.uk/environment/environmental-health/food/hygiene-scores-on-the-doors> (accessed 17 January 2011).
18. Simon, P.A., L. Phillip, R. Grace, G. Zhe Jin, R. Reporter, A. Aguirre and J.E. Fielding 2005. Impact of restaurant hygiene grade cards on foodborne disease hospitalizations in Los Angeles County. *Journal of Environmental Health* 67(7):32-36.
19. Worsfold, D. 2006. Consumer information on hygiene inspections of food premises. *J. Foodservice*. 17:23-31.
20. Wright, M., R. Smith, R. Evans, N. Williams and P. Leach. 2008. Evaluation of Scores on the Doors final main report for the Food Standards Agency. GSB Ref: CL 984.  
<http://www.food.gov.uk/multimedia/pdfs/sotdmainreport.pdf>
21. Zhe Jin, G. and P. Leslie. 2003. The effect of information on product quality: evidence from restaurant hygiene grade cards. *Qrtly. J. Economics*. 409-451.
22. Zhe Jin, G. and P. Leslie. 2005. The Case in Support of Restaurant Hygiene Grade Cards. *Choices* 20(2):97-102.

## **Appendices**

Appendix 1. TNS – Research report – Evaluation of Scores on Doors Pilot Program

Appendix 2. Consumer survey summary results

Appendix 3. Participating food business survey summary results

Appendix 4. Draft 'Scores on Doors' participation agreement

Appendix 5. Draft Food Premises Assessment Report

Appendix 6. Draft proposed 'Scores on Doors' certificate display

Appendix 7. Draft certificate display eligibility recommendations