

Food Safety Rating Scheme Pilot Assessment Report

September 2015

In February 2013 the Minister for Health, the Hon Jack Snelling, M. P., tabled a response to parliament about developing a Food Safety Rating Scheme (FSRS) for South Australia (SA).

As part of this response he tasked SA Health to develop and run a 12 month Food Safety Rating Scheme Pilot, to commence in late 2014, in order to test the merits of such a scheme in SA.

The SA Pilot commenced on 6 October, 2014. Due to the effective operation of the pilot and the significant amount of data that has been collected in the first nine months the Minister has determined that this scheme successfully demonstrates an opportunity to increase state wide food safety standards and provides a tangible benefit to SA consumers. As a consequence, the Minister has directed SA Health to commence refinement of the pilot to enable roll out of a voluntary full state wide scheme in early 2016.

In this interim period, councils already part of the pilot will continue as normal before transitioning into the revised scheme in 2016, along with supporting SA Health to integrate appropriate modifications to the pilot scheme. All other councils will be invited to join the full state wide scheme in early 2016 after receiving appropriate training and support from SA Health.

The following reports on the results collected from the SA FSRS Pilot.

1 Executive summary

Food Safety Rating Schemes, commonly known as Scores on Doors, are used nationally and internationally as a way of communicating, to the general consumer, the outcomes of food safety inspections, and this increased awareness of food safety inspections aims to ultimately drive an improvement in public health. A FSRS has been developed and piloted in South Australia based on the response to the recommendations from a SA parliamentary inquiry in 2013.

The FSRS piloted in SA was initially based on systems in existence in NSW, UK and Victoria and further developed in consultation with industry, councils and consumers. The mechanism of consultation and development has allowed an exceptional relationship to be developed with volunteering councils and business associations, which has resulted in a successful working environment and high level engagement. This process of consultation is intended to be mirrored in the minor modifications and roll out of a full state wide scheme.

The scheme piloted in SA is a 5 Star scheme, with 5 Stars representing excellent compliance with food safety standards. 4 and 3 Star certificates are awarded for very good and good compliance with food safety legislation. The scheme includes all high and medium risk food service businesses (P1 and P2) in the volunteering council areas which are due a routine inspection during the pilot period. The inspections conducted under this scheme are no different to prior to the pilot, except for the use of a tailored recording form. The inspection form requires each of the 48 elements (scoring questions) to be assessed and scored either as compliant with the legislation, non-compliant, not observed / tested at the inspection, N/A, or an Observation. Non-compliant elements are awarded a pre-determined score based on their potential risk to food safety by the Environmental Health Officer (EHO), and the total inspection score is then converted into a Star Rating. Those that achieve a star rating of 3, 4, or 5 Stars are awarded a certificate which can be displayed on the site of inspection by the business at the discretion of the business owner.

The scheme has been specifically developed to not cause any additional burden to businesses and to minimise additional burden on participating councils.

The pilot commenced on 6 October, 2014, with nine actively participating councils volunteering for the pilot. At the nine month data extract, 1032 inspections had been received and analysed by SA Health. At this point 52% businesses were awarded a star rating certificate, equivalent to 535 businesses.

It should be noted that, during the pilot, the star rating awarded to a business only reflects the 'point in time' inspection. Businesses were *not* re-scored after corrective actions were undertaken and therefore the results may suggest a larger ongoing non-compliance rate than is actually the case.

The data collected throughout the first nine months was extremely consistent and the department is confident that the information collected to date is sufficient to determine the next steps to be undertaken at the conclusion of the pilot.

Aside with providing knowledge to consumers, a significant secondary benefit of the pilot scheme is the collection of a large volume of quantitative data on food inspections conducted by local councils. This data has identified consistent specific areas of food businesses non-compliance across the nine councils and enabled the department and councils expeditiously develop targeted solutions to improve compliance. The data also provides a baseline against which to measure the effectiveness of these solutions.

The pilot has highlighted three main areas where work is required to raise awareness, improve understanding and assist businesses to comply with the food safety legislation. These three areas are:

- Temperature control of foods that are prepared and stored (including the provision of an adequate temperature measuring device)
- Cleaning and Sanitising, and
- Hand washing.

Councils participating in the pilot have indicated that although there needs to be some modifications, they fully support a SA FSRS state wide roll out as it provides a risk based prioritised approach to inspections. They have noted that this scheme positively encourages businesses to improve their food safety standards and accelerates their food safety compliance. This quantitative scheme can ultimately improve the quality of the food safety inspection and therefore should result in improved food safety in food businesses.

The pilot has shown or has indicated that a full scheme would be able to:

- allow for targeted approaches to drive compliance with the food safety legislation and in turn aim to improve food safety in South Australia,
- help increase food safety awareness for consumers,
- raise inspection transparency to food businesses, and
- provide another tool with which to improve inspections within and between councils across South Australia.

For these reasons, as well as the positive feedback provided by the pilot councils and the significant amount of data gathered during the first 9 months of the FSRS pilot, the department strongly recommended to the Minister for Health, that the voluntary scheme is refined, in conjunction with industry and local council, rolled out state wide and supported by the department initially for a period of 24 months.

A three phased approach to rolling out the full state wide voluntary scheme is proposed with a commencement date (depending on interest by councils) of early 2016.

2 Background

2.1 South Australian Food Safety

Food safety in South Australia (SA) is covered by state legislation, which follows national model legislation. The legislation is in place to ensure that food prepared for sale is safe and suitable and must be labelled correctly. Further controls are in place to ensure that vulnerable populations, such as the elderly, immuno-compromised or infants are further protected from risks associated with unsafe handling and preparation of food.

The vast majority of food businesses are controlled under the *SA Food Act, 2001* (the Food Act), the corresponding *SA Food Regulations, 2002* and the Australia New Zealand Food Standards Code (the Code). This legislation provides outcomes that must be achieved by food businesses to ensure that food is safely prepared and suitable for consumption.

In SA, the responsibility to enforce the food safety requirements under the Code is undertaken by the local councils and SA Health. These practices are monitored by way of unannounced inspections by Environmental Health Officers (EHOs) that are authorised officers under the Food Act. The frequency of these inspections are determined by the risk of the foods being prepared on site (i.e. a site making batches of raw egg aioli has a higher food safety risk, than a bakery which sells plain bread), and the overall performance of the business. The sites with higher risks are inspected more frequently. The nature of these unannounced inspections reflect what is happening at the time of the inspection only, and may mean that not all processes and procedures will be viewed by EHOs at their inspection. In these situations officers use a range of other mechanisms to assess the food safety standard of the business and assess unobserved processes.

There is no prescribed format for recording inspection findings. Each council may use their own form, but many use the nationally available Australian Food Safety Assessment (AFSA) tool which is a commercially available product made available by Environmental Health Australia (an institute body for EHOs, see appendix 1).

After inspection there are a range of enforcement tools available to the local councils to ensure that corrective actions are applied to address any non-compliance with the legislation. Enforcement action is taken under the principle of a 'graduated and proportionate' response and may range from further inspections, formal letters, and expiations to prosecutions. The action(s) taken will be appropriate, and intend to ensure food safety, and will also reflect other considerations such as the site's previous inspection history and seriousness of non-compliance.

SA Health does not have any direct involvement with council inspections, findings or enforcement activities. It does however, provide oversight, advice and assistance to councils. Annually, councils are legally required to provide summary data on these inspections for publication in the annual Food Act Report, tabled in parliament by the Minister for Health.

Inspection results for individual food business are not made public. Consequently, consumers generally have no information regarding the food safety performance of individual food businesses. The only publically available information, other than the Food Act Report, are successful prosecutions which are included on the SA Health prosecution register

(<http://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/about+us/legislation/food+legislation/food+prosecution+register>).

2.2 SA Health / Local Government Association (LGA) Memorandum of Understanding (MOU) Work Program

A MOU has been established between SA Health and the LGA to outline the responsibilities for monitoring and enforcement under the Food Act. This MOU also outlines the need for a strong working relationship to work towards continuously improving food safety and the administration of the Food Act in SA.

As part of the SA Health and LGA commitment under the MOU a work plan was developed in 2010 to progress strategic priorities and projects. At that time, 14 key projects were developed as part of the work plan including projects focussing on consistent application of the Food Act by local councils, monitoring and enforcement of the Food Act, and the development and pilot of a state wide Food Safety Rating Scheme (FSRS)¹.

A related and important precursor, project prior to undertaking a FSRS was the Food Business Risk Classification and Inspection Frequency Project. This project was initiated to improve consistency in application of risk rating of businesses by local councils across the state. The expectation of the project was to provide a state wide science-based, transparent risk assessment tool to determine the risk of each food business. The assigned risk in conjunction with business performance would assist determination of the frequency of food inspections as well as identify the inspection focus. The SA Food Business Risk Classification System was released, after extensive trialling, in late 2013. Councils are currently in an implementation phase, and will be expected to begin reporting against this system in the 2015-2016 Food Act Annual Report. For more details on this system refer to <http://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/protecting+public+health/food+standards/priority+classification+of+food+businesses>

2.3 Food Safety Rating Schemes

Food Safety Rating Schemes, commonly known as Scores on Doors, are used nationally and internationally as a way of communicating, to the general consumer, the outcomes of food safety inspections. Although each scheme has a different method of presenting results to the consumer, they all work on the following principles

1. Food businesses are inspected in accordance with local legislation
2. The inspection findings are scored / quantified, based on supporting evidence
3. The score is converted into a consumer friendly rating / symbol
4. The rating / symbol is displayed on site (either voluntarily by the business or in some cases the display or the star rating is mandated)

Within SA, two Food Rating Schemes were being operated independently prior to the commencement of this pilot (Image 1). The City of Salisbury operated a star rating scheme, which attributed a certificate with up to five stars. Four stars are awarded where legislation was fully complied with and a further star was assigned where additional food safety practices were employed.

The City of Charles Sturt operated the 'Deliciously Safe' scheme. Under this scheme, businesses were awarded a sticker to display in their premises only where they complied fully with the requirements outlined in the legislation.

¹ The FSRS project was transferred across the current work plan (2014-2016) – which can be accessed at <http://sahealth.sa.gov.au/wps/wcm/connect/Public+Content/SA+Health+Internet/Protecting+public+health/Food+standards/Food+Safety+Work+Plan/>

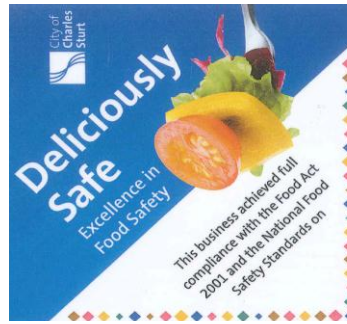


Image 1 : Example certificates from the City of Salisbury and City of Charles Sturt current Food Safety Rating Scheme certificates

3 SA Food Safety Rating Scheme Pilot

3.1 Background

In 2010, the House of Assembly, on a motion from John Hill (previous SA Minister for Health and Ageing), directed the Social Development Committee (SDC) to inquire into and report on the merits or otherwise of schemes that provide information to the public on the results of food safety inspections and non-compliance with the Food Act.

The Inquiry Report was released in September, 2012, and the Ministerial Response to the Report was tabled in Parliament on 19 February, 2013. The Inquiry Report contained 20 recommendations relating to the establishment of a state wide food safety rating ('scores on doors') scheme in SA.

The Ministerial Response supported the main recommendation of the Inquiry Report - to develop and implement a voluntary, state wide, food safety rating scheme for high and medium food service businesses in SA, similar to those already operating in some local council areas of Australia and overseas.

The primary objective of such a scheme would be to provide information to the public on the results of routine food safety inspections carried out by local council. This would normally take the form of a certificate or poster showing a 'score' that is displayed on the door of the business for consumer information.

3.2 Pilot Design / Development Process

Development of the pilot scheme occurred in four distinct phases:

1. Review of schemes in operation in South Australia / nationally / internationally
2. Development of overarching principles and scheme design by the Reference Group (RG)
3. Development and testing of the inspection form by a working sub group
4. Finalisation of pilot design by the volunteering councils

The review of currently operating schemes assessed the key elements of each scheme focusing on data collection methodologies, rating of non-compliances and presentation of information to consumers. The information gathered on existing schemes in operation formed the basis of options provided to the tripartite RG for decision for the SA pilot.

Membership of the RG included SA Health, the Health Consumers Association SA (HCASA), Subway, an independent restaurateur representing Business SA, Restaurant and Caterers Association (RCA), Australian Hotels Association (AHA), City of Salisbury, Adelaide City and the City of Charles Sturt councils, and Environmental Health Australia SA.

The RG was formed in August, 2013 with the four main deliverables:

- 1) Develop key elements of the scheme
- 2) Engage councils to participate in the pilot
- 3) Engage volunteers from industry within participating council areas to take part in the 12 month pilot
- 4) Assist in preparation of communication plan for the pilot.

In summary the RG determined that the SA pilot scheme should be a 5 Star rating system with an inspection form and rating system similar to that used in NSW and Victoria.

Consultation with NSW has given insight into the development, successes and failures of their scheme which has been running, on a voluntary basis for over six years, and provided interesting lessons for development of the SA scheme.

Other key elements / rules that were determined by the RG included:

Volunteering councils would be asked to make all their EHOs available for training prior to the start of the pilot, agree to use the new form for all high / medium risk (P1 and P2 as defined by the Food Business Risk Classification) food service businesses when they were routinely inspected, to submit all data to the Food Safety and Nutrition Branch (FSNB), to participate in review meetings during the course of the pilot and to agree to follow the guidance of the scheme to ensure that there was consistency in operation across the council areas.

It was acknowledged that although councils would not be asked to conduct different or more frequent inspections, the physical use of a new form, and additional administration such as transferring inspection outcomes to SA Health, would increase the time resource burden on the EHOs.

The inspection conducted would not vary from pre-pilot inspections as it still requires compliance measured against Standards 3.2.2 and 3.2.3 of the Code. The only variation would be a new tailored form to record the inspection findings. As such there would be no additional burden on businesses. The inspection form was made available on the SA Health website, and widely communicated through business associations, leaflet drops in some council areas and social media, prior to the commencement of the pilot to ensure transparency and encourage businesses to improve areas that would be scored.

Relevant businesses in the volunteering councils are given the choice of whether and where to display the awarded star rating certificate, but all food service businesses in scope would be inspected using the new inspection form to ensure maximum data capture. In several council areas, the tailored inspection form was also used for all other inspections to make the process easier for the EHOs and reduce other administrative burden.

The essential requirements needed on the draft Star Rating certificate was also determined by the RG.

Prior to finalising the scheme, key elements, as determined by the RG, were made available as a public consultation document. This document was made available in a downloadable form, or as interactive questions which were completed directly via a Survey Monkey questionnaire.

The links to this consultation document were released to; all local councils, to the LGA, a range of business associations including AHA and RCA, Business SA, on a consumer association website, and were placed on the SA Health website with support from media and communications to promote it via a range of social media mechanisms. Outcomes of the consultation were incorporated into the pilot design.

All council areas were invited to participate in the 12 month pilot. The council areas that volunteered were:

- Adelaide City Council
- Adelaide Hills Council
- City of Holdfast Bay
- City of Onkaparinga
- City of Salisbury
- City of Tea Tree Gully
- District Council of Mount Barker

- Mid Murray Council
- The Rural City of Murray Bridge
- Wattle Range Council²

The FSRS is not a replacement to enforcement of the food safety legislation. The scheme aims to provide an additional tool to encourage businesses to comply with the legislation. Undertaking the scheme does not replace the enforcement actions that are available to councils to ensure safe food production at food businesses.

In parallel to the overall pilot development process a sub group which included Adelaide City, City of Salisbury and City of Charles Sturt council, EHA and SA Health further refined and tested the inspection form prior to the commencement of the pilot.

Using the general details determined by the RG, the preparation of Standard Operating Procedures (SOP) for the volunteering councils (appendix 2), the Star Rating certificate final design and the specifics of the inspection form were finalised in conjunction with the 10 councils that volunteered for the pilot period.

Support and guidance was also provided by the NSW Food Authority at the later stages of development, in order to learn from it's experiences of running a similar scheme for four years, and in specific areas, the NSW model was followed for some of the finer details of the SA scheme.

3.3 The Final SA Pilot Scheme

The scheme has two facets:

- The food business 'inspection score' - calculated by Environmental Health Officers (EHOs) at their routine inspection.
- A certificate/sticker – to be displayed on the business premises to publicise the score to the general public. The provision of this interpretive information may then assist the consumer in their choice of a food eating establishment.

3.3.1 Scoring

The tailored inspection form, which is divided into 48 specific elements (appendix 3), is used to assess compliance with the Food Standards Code, food safety standards 3.2.2 and 3.2.3. For each element the following inspection outcomes may be recorded (Table 1):

Inspection outcome	Notes
C	<i>Compliant</i> with the legislation
NA	<i>Not Applicable</i> to this inspection. I.e. not all food business display hot food
NO	<i>Not Observed</i> At the time of the inspection the EHO did not see, or was unable to ascertain though directed questioning whether the element is being complied with

² at the nine month phase of the pilot, no inspections have been received by Wattle Range Council. As such the scheme assessment will be based on the nine actively volunteering councils.

O	<p>An <i>Observation</i> should only be recorded if:</p> <p>The non-compliance observed is minor in nature and does not pose a direct food safety risk (i.e. a cracked tile away from food preparation surfaces). Deviations from the legislation which are 'out of character' with other elements of the inspection may also be recorded as an observation at the discretion of the inspector.</p> <p>If a minor non-compliance is observed, that has been noted before, and could easily, reasonably and practicably be remedied then an observation must not be raised - but the full non-compliance score must be recorded.</p> <p>Re-occurring or an accumulation of a minor observation, (e.g. accumulation of dirt and debris) must be scored as a non-compliance</p>
1,4, or 8 (as specified)	Non-compliant with the legislation, record the score as directed on the inspection form

Table 1: Summary of the inspection findings that may be recorded against each inspection element

The inspection score is generated by assigning points to each element of the inspection that are not compliant with the legislation. A set score of 1,4 or 8 is applied to each element depending on the direct risk the non-compliance has on food safety.

- 1 = low risk,
- 4 = medium risk and
- 8 = high risk to food safety.

In a few cases, EHOs have the opportunity to select from two scores 1 or 4, 4 or 8, and 1 or 8; this has been allowed only for a few elements where the precise nature of the non-compliance is highly variable in terms of food safety risks.

For example: element 13 'Potentially Hazardous Food (PHF) stored under temperature control' can be scored as 4 or 8 points. It would be appropriate to score 8 for a business that was making up large batches of stews / casseroles / gravies and then allowing them to cool in the ambient air before placing them in the refrigerator. However, if a business was making batches of stews / casseroles / gravies and splitting them into smaller portions to cool before placing in the fridge a score of 4 points may be more appropriate.

3.3.2 Star Rating certificate

All scores calculated are combined, the final score is then translated into a star rating category (Table 2).

Inspection Score	Star Rating	Notes
0-3	5 Stars - Excellent	Reflects excellent compliance with food legislation
4-7	4 Stars – Very Good	Reflects very good compliance with food legislation
8-11	3 Stars - Good	Reflects good compliance with food legislation
8-11	NA	If any high risk (8 point element) is scored as non-compliant, no certificate will be issued, even if the final total score is 11 or below.

0-11		If element 16 – ‘ <i>All food are processed adequately in particular high risk foods</i> ’ is recorded as Not Observed during the inspection then a certificate will not be issued irrespective of the total score.
12+	None	No certificate issued as too many minor or major non-compliances with the legislation recorded at the inspection

Table 2: Summary of the final 'Star Rating' categories that may be assigned to each routine food inspection

Where the correct score is achieved a star rating certificate (appendix 4) is issued by SA Health directly to the business, or via the EHO (as directed by each council), along with supporting information for the business and the consumer (see appendix 5 and 6).

A score of 12 or more points (None – Star Rating category) results in no certificate being issued. This may be as a result of many minor non-compliances with the legislation, or to the other extreme could represent a major failing by the businesses to comply with the legislation.

3.4 Pilot Operation

The operation of the pilot was designed to ensure minimum resource impact on the volunteering local councils and no difference to the high / medium risk (P1 and P2) food service businesses that are captured under the scheme.

To minimise the burden on volunteering councils, SA Health has set up individual arrangements to receive data, which best fits existing council systems. This ranges from scanned and emailed original inspections, copied and posted inspections, electronically submitted inspections and database extracts from electronic systems.

To participate in the pilot, councils agreed to provide one point of contact for correspondence between the council and SA Health and to agree to the guidelines as outlined in the SOP. These SOPs have been consistently applied by all council members of the pilot and have helped to ensure that all councils have operated the system in a consistent manner.

Data to date, has been received within a timely manner and, in general, certificates have been processed and dispatched, well within the seven day target by SA Health. During the pilot, the volunteering councils regularly met to discuss issues that have been noted during the pilot. These issues have been either addressed at the time and resolved to the agreement of all councils, or have been added to an agenda for consideration in development of a full state wide scheme.

The working relationship with the councils has been extremely productive and has resulted in discussion and decision around areas of non-compliance that has not been achieved in the past. It is anticipated that this method of consultation will be used in the interim period to ensure the maximum engagement of the councils involved in the scheme.

3.5 Pilot Results

The pilot officially started on 6 October, 2014. Data has been captured from the inspections of high and medium risk food service businesses submitted by the councils participating in the trial. Data was extracted at three, six and nine months [2/1/15; 2/4/15 and 2/7/15 respectively] after commencement and has been used to outline the interim results below.

3.5.1 Overview results

Across the nine³ council areas inspection results have been provided every three months. It is predicted that by the end of the pilot data will have been collected from ~1400 routine food inspections, most of which are from different food businesses (Table 3 / Figure 1).

At this point 52% businesses were awarded a star rating certificate, equivalent to 535 businesses.

It should be noted that, during the pilot, the star rating awarded to a business only reflects the 'point in time' inspection. Businesses were *not* re-scored after corrective actions were undertaken and therefore the results may suggest a larger ongoing non-compliance rate than is actually the case.

Star Rating Category	3 months	6 months	9 months
NA	14	39	47
None	112	286	450
3 Star	26	60	110
4 Star	45	116	194
5 Star	62	153	231
Total certificates issued*	133	329	535
Total number inspections where no certificate issued**	126	325	497
Total inspections	259	654	1032

Table 3: Summary frequency of certificates issued / no issued at 3,6 and 9 months into the FSRS pilot

*combined numbers of 3,4,5 Star certificates

** combined numbers of NA and None inspection frequencies

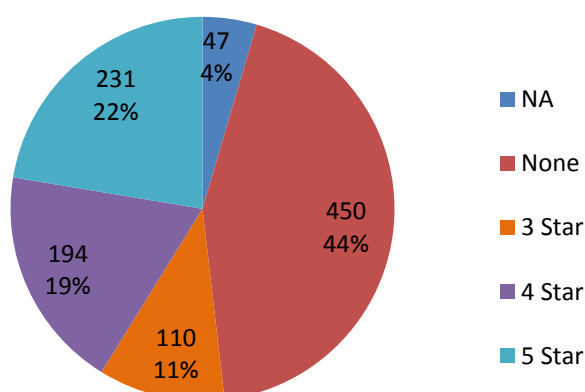


Figure 1 : Summary of the 9 month data presented as a proportion of total categories

³ No inspections have been received from Wattle Range Council.

Based on the overall spread of data across the five Star Rating categories that can be assigned to each inspection (NA, None, 3,4,5 Star), the department is extremely confident that the interim data collected at the nine months will be representative of the 12 month data, as the proportion of inspections that are assigned each category has remained constant through-out the pilot to date (Figure 2).



Figure 2 : Percentage of inspections recorded within each category at 3, 6, and 9 months.

3.5.2 Recorded Non-Compliance

Fourteen of the elements on the inspection form are attributed a score of 8 points, due to the high risk that non-compliance poses to food safety. Table 4 highlights the frequency (at nine months) that these elements have been recorded as non-compliant as a percentage of the total 1032 inspections conducted. Of note are elements 41 (sanitising of food contact surfaces) and 47 ('how' hands are washed) which were recorded as non-compliant at 16% and 15% of inspections respectively.

Element number	Element	% Non-compliance (NC)
2	The business does not pose a serious danger to public health and is fit for purpose	0.1
3	Food business responsibilities satisfactorily demonstrated	1.2
13	Potentially hazardous foods (PHF) stored under temperature control	2.1
16	Foods processed adequately - in particular high risk foods	1.4
17	PHF foods are kept out of temp control for the minimum amount of time	3.7
18	PHF are cooled correctly	2.1
19	Rapid reheating/hot holding of PHF	0.9
21	PHF displayed under temperature control or time limit not exceeded	7.6
41	Adequate cleaning and sanitising of food contact surfaces -	16.6

	including equipment (e.g. benches / boards)	
43	Food handlers must NOT prepare or handle food if suffering from a condition	0.1
45	NOT eat, sneeze, spit, cough, use tobacco or similar over food/food prep surfaces	0.9
46	wash and dry hands as directed by	5.6
47	wash hands using 'soap', warm running water and dry hands appropriately	14.6
48	demonstrate appropriate food handling - skills and knowledge	1.6

Table 4 : Percentage of times each high risk element (8 points) was recorded as non-compliant at 9 months.

Eighteen elements on the inspection form score 4 points if found not compliant as non-compliance could pose a medium risk to food safety (Table 5). Element 11 (storage – protection from contamination) was non-compliant in 24% of all 1032 inspections conducted. Whilst, 23 (hand washing facilities), 35 (use of a temperature measuring probe) and 37 (adequate cleaning of premises) was recorded as non-compliant in 14%, 18% and 15% of inspections respectively.

Element number	Element	% Non-compliance (NC)
4	Received goods are protected from contamination	0.4
6	Potentially Hazardous Foods (PHF) received under temperature control	3.3
7	All foods are protected from contamination during transportation	0.1
8	PHF transported under time/temp. control	0.1
11	Goods are stored appropriately and protected from contamination	24
13	HF stored under temp control	7.1
14	Safe and suitable food ingredients used	5.3
15	Foods protected from contamination during processing	5
20	Displayed foods are protected from contamination, Ready to Eat (RTE) self service food supervised and separate utensils provided	1.5
23	Accessible hand washing facilities used only for washing, hands, face and arms	14
24	Suitability and maintenance of Premises	6.7
25	Suitability and maintenance of Fittings	3.7
26	Suitability and maintenance of Equipment	2.9
34	No signs of pest activity	2.8
35	Accurate temp measuring device in use	17.6
37	Adequate cleaning of premises (walls, floors, ceilings)	15.2

38	Adequate cleaning of fittings	10.8
39	Adequate cleaning of equipment	8.8
40	Adequate cleaning and sanitising of Eating and drinking utensils	7.2
42	Food handlers must avoid unnecessary contact with RTE food or food preparation surfaces	0.9
44	Food handles must wear appropriate clean clothing/bandages, and minimise personal contamination of food/food contact surfaces	0.1

Table 5: Percentage of times each medium risk element (4 points) was recoded as non-compliant at 9 months.

Due to the variable effect that some non-compliances may have on food safety, it should be noted that some elements will be recorded as both high / medium and / or low.

An 'observation' is one of the defined means of scoring an element that is not strictly compliant with the legislation but, where the EHO does not want to apply the full non-complaint score. Instances where an 'Observation' can be recorded is clearly defined on the form and in supporting material.

Prior to the commencement of the pilot, there was a high degree of concern that the 'observation' recording category could 'hide' non-compliances in businesses and still allow them to be awarded a Star Rating certificate.

The frequency of 'observations' for each specific element are low. The ability to have this scoring option has given a degree of flexibility to EHOs during inspections that is vital to ensure the engagement of councils and overall trust in the scheme, and this low level of recording has allayed the original concerns noted above.

Both an 'Observation' and a scored non-compliance indicates, that for a particular element, there is a degree of non-compliance with the legislation which may impact on the risk to public health. Therefore for the purposes of the interim report, the frequency of Observations and non-compliances will be combined to show 'Total NC'.

The combined data for the high risk (8 point) elements for three, six and nine months are displayed in Figure 3. As well as indicating particular elements which have the highest non-compliance, it also demonstrates that the spread of data collected over time has remained relatively static and this further adds confidence that that data extracted at the nine month stage of the pilot will be reflective of the final data extract at the conclusion of the 12 month pilot phase.

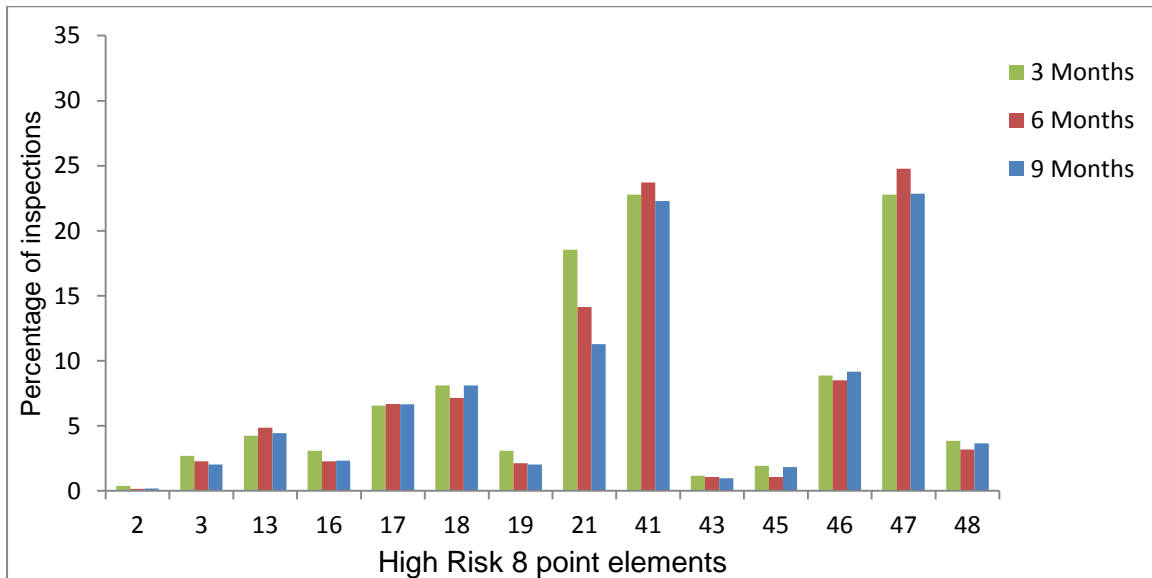


Figure 3: Percentage of Total NC (combined observations and true NC recorded), for all high risk elements at 3,6,9 months

From the data the elements with combined NC and observations most frequently recorded are:

21 - PHF displayed under temp control or time limit not exceeded

41 - Cleaning and Sanitising of food contact surfaces - including equipment (e.g. benches / boards)

47 - wash hands using 'soap', warm running water and dry hands appropriately

Other frequently non-compliant elements are: 17,18 and 46.

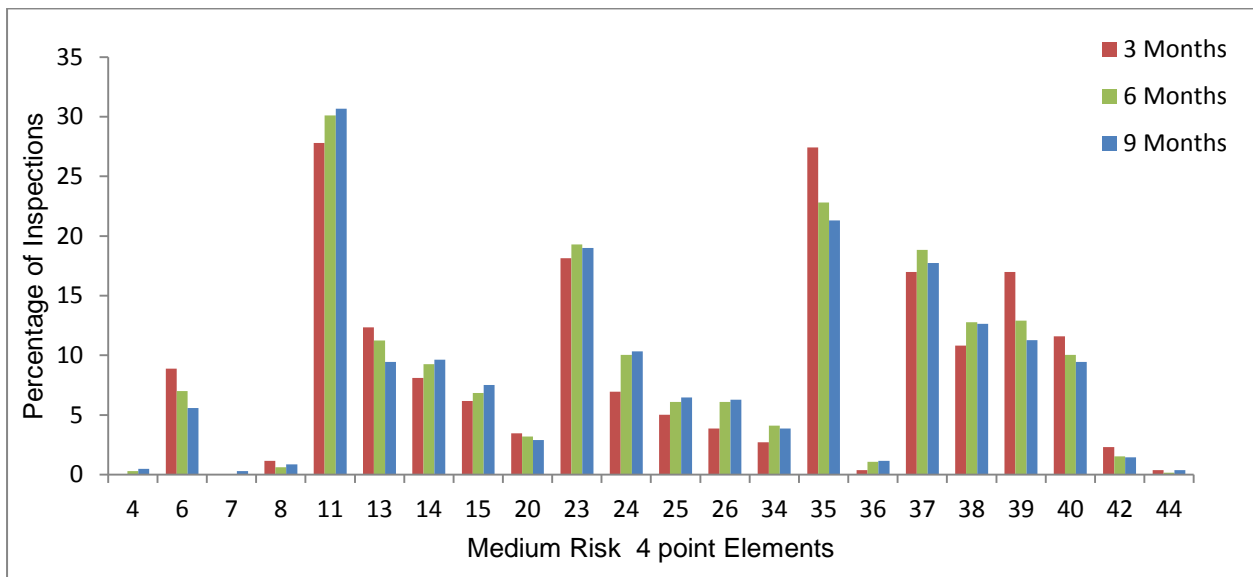


Figure 4: Percentage of Total NC (combined observations and true NC recorded), for all medium risk elements at 3,6,9 months

Consideration of the medium risk (4 point) elements over the three data periods (see Figure 4) indicates the following elements have been frequently recorded as non-compliant and / or an observation:

11 – Goods are stored appropriately and protected from contamination

23 - Accessible hand washing facilities used only for washing, hands, face and arms

35 – Accurate temp measuring device in use

37 – Adequate Cleaning of: Premises (walls, floors, ceilings)

38 - Adequate Cleaning of: Fittings (e.g. shelving, ovens)

39 - Adequate Cleaning of: Equipment

Other frequently non-compliant elements are 13 and 40.

In summary, the data collected from the inspections reflects elements from chapter 3 (3.2.2 and 3.2.3) of the Food Standards Code. The weighting that has been applied aims to reflect the direct risk each element has on the safety of the food for sale.

When these frequently recorded elements are grouped together it provides several key distinct themes. These are:

- Temperature control of foods that are prepared and stored (including the provision of an adequate temperature measuring device)
- Cleaning and Sanitising, and
- Hand washing.

Targeting these key areas, will also incorporate some of the non-consistencies recorded for other linked elements. Section 3.8 outlines the specific measures that are being undertaken by SA Health to initially address these areas.

3.5.3 Repeated routine inspections

It was not expected during the 12 month pilot period, for many premises to receive a second routine inspection due to the general frequency of when these are conducted, (routine inspections, do not include the follow up actions that EHOs conducted to ensure that corrective actions are completed). Up to the nine month period only 22 sites received more than one routine inspection, with 19 significantly improving or not changing score / star rating and only three achieving a worse inspection outcome. Due to the low numbers of inspections it is not deemed appropriate to draw further conclusions from the data at this time.

3.5.4 Pilot logistics

The actual operation of the scheme worked well from both SA Health and the councils' perspectives. It has been noted that councils have taken generally about double the time to conduct the inspection using the new form. This is partly due to the extra subcategories that the EHOs are expected to record against plus it reflects inspections being conducted in a more 'risk focused' manner.

Work will be required prior to full scale roll out on how the data is collected and also the process in which this information is provided to SA Health. Learnings from the pilot will help direct this work which in turn is expected to reduce this time burden on the councils.

During the pilot, two council areas have moved from paper based recording towards electronic collection of information. This has provided both benefits and challenges, which will need to be addressed to ensure a smooth, ongoing transition of data.

3.6 Council Feedback

At the conclusion of the pilot, detailed feedback will be collected from councils with regard to the operation of the scheme, resource implications, technical details of the scheme / form etc. At this interim period all councils were asked if they would like to submit an overall comment of the scheme to date. The following shows these comments received from four councils prior to the release of this report:

“This is a fantastic scheme. I had my doubts prior to commencing but after inspecting the businesses in our area we have discovered many benefits. We now have a quantitative measure which has a more powerful influence on compliance. For example, in the past we would have some ticks and crosses next to the business - which is meaningless to the businesses as far as how good they are. Now we can give them a score - ‘grade’ – and all businesses identify with this and are far more motivated to improve their score and consequently reduce their risk of food poisoning. This scheme also enables officers to conduct a more comprehensive inspection focussing on high food poisoning risk areas/practices. Therefore we are providing a more comprehensive service to the business and their customers. Businesses are also excited to display their score – when they receive a good score – as this a valuable marketing tool. Therefore overall this scheme has had a significant impact on food safety and business/ economic development in South Australia. We also score businesses that do not need to be scored because of the effect it has on compliance and communication with the business. We hope the scheme remains.”

“The food safety rating scheme has provided a risk based, prioritised approach to the old standardised food safety inspection. It also provides a quantitative measure as to the food safety compliance of a particular business. There have been some “teething issues” with the form during the trial period. However, with time and some slight modification to the form we should likely see a streamlined and further refined standardised inspection process.”

“The scheme may be unfair on some businesses due to lack of consistency between EHOs. It gives businesses more incentive to improve. The scheme may be more meaningful if it were compulsory. It has changed the focus of food inspections from cleaning and maintenance to a food safety focus. The scheme may be more meaningful if the general public had a greater awareness/understanding of the program (there hasn’t been much publicity).”

“The food safety rating scheme provides an excellent incentive to positively encourage businesses to improve their food safety standards. The City of Salisbury has received significant supportive feedback regarding the scheme from both consumers and businesses. Environmental Health Officers have noticed a significant acceleration in food safety compliance from the businesses willing to improve their star rating.”

3.7 Consumer Feedback

Consumer feedback has been limited during the course of the pilot due to the low number of businesses displaying certificates in concentrated areas (which would facilitate choice). Engaging consumers to ascertain understanding of the pilot scheme, and providing input into the development of the state wide system will be undertaken using a range of mechanisms as outlined in the communications plan.

3.8 Interim Actions

3.8.1 Issues identified from the pilot

The data collected from the pilot FSRS to date, has highlighted existing areas of frequent non-compliance. The scheme has not ‘generated’ these issues, but has provided a means by which we can, with a degree of certainty, acknowledge they exist and quantify the frequency of this occurrence, and thereby direct appropriate resources to address the risks.

Different responses or actions are needed depending on the risk non-compliance poses to food safety. As an initial acknowledgment of the elements which have been highlighted by the interim data (hand washing, sanitising and temperature control), SA Health is currently reviewing information / resource materials directed at these areas and focused towards both EHOs and food businesses.

Medium and longer term actions are currently being considered to address issues and gaps identified by the pilot results, and include:

Training

- Specific technical training for EHOs (to enable more detailed advice to be provided to businesses)
- Training offered to businesses at a state level
- Presenting at events / conferences.

Information

- Wider range of business focused information in user friendly formats
- Business information provided in a range of languages
- Additional content added to the SA Health Food Safety Kits which are provided to all new businesses
- Improved website content on high risk food elements
- Presenting at events / conferences
- Interactive web content
- Newsletters / fact sheets.

Enforcement

- Facilitate consistent enforcement approach by authorised officers, through guidance and training.

These actions will intend to focus on ensuring that business owners know and understand their requirements under the legislation; that authorised officers are competent and confident to conduct effective inspections and providing appropriate advice and support to businesses; and ensuring that there are appropriate consequences for businesses that can't or won't comply with legislative requirements.

Further actions will be determined in consultation with council areas and as / when / if new areas are highlighted by the data, and will be an ongoing project parallel to the FSRS and be conducted in conjunction with the LGA / SA Health working group.

3.8.2 Consistency

Aside from addressing the areas of non-compliance, inconsistencies in inspection outcomes and enforcement actions have also been highlighted by the scheme. These variations need to be addressed to develop trust and integrity in the scheme.

Work has already commenced in this area with the nine volunteering councils, but as the scheme is extended a greater focus will be required to ensure all authorised officers are acting in a similar manner in similar situations. Further work addressing consistency generally across the state, is already being undertaken via other LGA / SA Health working group projects, such as the Food Business Risk Classification Project, Inspection and Enforcement Principles and the New Enforcement Framework.

The following measures will be / are being put in place to ensure a smooth integration of new councils into the scheme and throughout the duration of SA Health's dedicated and direct involvement with the scheme:

- Dedicated training will be offered to all EHOs, including the gathering, assessment and consistent interpretation of inspection findings
- Guidance material for the pilot will be expanded to include new learnings and provide a greater degree of guidance
- Regular training / update meetings / feedback will be collected and offered to the councils involved
- Specific discussion of 'common' issues, with agreed outcomes determined by the councils participating at regular meetings
- Data will be regularly screened to look for potential issues of areas of non-compliance or areas of inconsistencies in scoring
- Where appropriate, joining councils will be offered a 'buddy' from the council areas who participated in the pilot to provide further practical support on day to day operational issues
- Where possible, issues of contention will be resolved by discussion with engaged councils. This should ensure a greater degree of engagement and a higher degree of consistent interpretation
- Provision of guidance on consistent council enforcement actions, supported by a parallel work program 'the Enforcement Project'.

3.9 Opportunities

A vast amount of data has been collected in the first nine months of the pilot. This data provides valuable baseline information into the current status of compliance with the food legislation. It will enable targeted activities by local councils and SA Health in the specific areas of non-compliance highlighted by the data, and subsequent inspection findings will allow the effectiveness of these activities to be monitored.

However, collection of this data, has also highlighted more areas where further data could be collected and areas in which the scheme, over time, could be evolved to capture more information.

Roll out of a modified scheme will allow further links to be established with the Food Businesses Risk Classification System and a greater inspection focus on food processing activities to be achieved.

This scheme has highlighted:

1. Opportunity to gather data not previously accessible
2. Possible gaps in the current inspection process
3. The opportunity to focus food business inspections on high risk food preparation and handling, to align with the Food Business Risk Classification System.

4 Interim Pilot Conclusions

Councils participating in the pilot have indicated that although there needs to be some modifications, they fully support a SA FSRS state wide roll out as it provides a risk based prioritised approach to inspections. They have noted that this scheme positively encourages businesses to improve their food safety standards and accelerates their food safety compliance. This quantitative scheme can ultimately improve the quality of the food safety inspection and therefore should result in improved food safety standards.

The FSRS pilot has shown or has indicated that a full scheme would be able to:

- allow for targeted approaches to drive compliance with the food safety legislation and in turn aim to improve food safety in South Australia,
- help increase food safety awareness for consumers,
- raise inspection transparency to food businesses, and
- provide another tool in which to improve EHO consistency across South Australia.

For these reasons, the positive feedback provided by the pilot councils and the significant amount of data gathered during the first 9 months of the FSRS pilot the department strongly recommends that the scheme is, in conjunction with industry and local council, rolled out and supported state wide.

The scheme has provided valuable data that can help lead to strategic improvements in resources, training and education.

Three main key areas have been highlighted for an initial focus at a state and council level to drive legislative compliance which then should improve food safety. An initial range of mechanisms are being put in place to address these. Further work plans will be developed targeting these areas in conjunction with the LGA / SA Health MOU working group. These activities target the high risk elements that businesses are regularly not complying with, and therefore pose the highest risk to food safety. All other non-compliances, including the low risk elements still indicate a non-compliance with the legislation and must not be ignored; but in an environment of restricted time and resources these are being targeted to areas which are deemed to have the greatest public health benefit, an action that could not be conducted quantifiably prior to the start of this pilot.

The wider use of this scheme will provide a positive mechanism in which to highlight the issues of food safety to consumers and businesses and help target, in conjunction with existing regulatory measures, the areas which increase the risk of food borne illness in South Australia.

The mechanism of consultation and development of the initial and final stages of the pilot scheme worked exceptionally well. It is proposed that this model will be extended into the development of the full scheme.

A state wide scheme will support and build on systems already in place and will continue to provide a quantitative overview of food safety in SA, and will provide a valuable mechanism to address the effectiveness of projects and systems targeted at improving food safety.

5 Proposed Next Steps

A full and final data analysis will be conducted at the conclusion of the 12 month pilot. It is not expected, however, for the last three months to raise any other significant issues or alter the findings as outlined at this 9 month stage.

There are two distinct phases to expand this scheme state wide in 2016.

1. Scheme refinement / transition phase (now – December, 2015)
2. Expanded scheme rolled out across the state (early 2016). However, a phased roll out may be required depending on the number of new councils volunteering to join the scheme

5.1 Scheme refinement / Transition phase (September – December, 2015)

In this period, councils who are already part of the pilot and who wish to continue will be requested to continue as per the pilot period. Any changes that are implemented will be incorporated into their actions from the formal roll out of the scheme in early 2016.

If required, this period may also be used to trial with restricted councils or EHOs individual aspects of the final scheme to ensure that they will work smoothly during full roll out.

Key elements of this phase include:

- Release interim results to original Reference Group and participating councils
- Commence engagement with all other councils to seek interest in participating in full state wide scheme
- Form a new tri-partite reference group with two main aims:
 - Assess and review the 12 month pilot
 - Support the actions of SA Health in refining the scheme ready for roll out
- Finalise a dedicated communication plan in conjunction with media and communication teams and liaise with communication teams in the pilot councils
- Commence work and support for local councils on technical areas highlighted from the collected data
- Engage with NSW Food Authority to discuss interim findings and possible actions and approaches to address process issues identified, with special reference to consumer understanding and engagement.
- Review and refine the scheme in conjunction with the working group, with the main aspects including:
 - Inspection form
 - Data collection process from councils operating electronically (to include assessing feasibility of using the current Public Health Management System (PHMS) to collect the data directly
 - The Certificate
 - Data integrity, security, compatibility of systems and contingency plans for loss of data
 - Consideration of further opportunities provided by the information collected by the pilot.
- Ensure interested councils are trained and ready to commence operations under the banner of the scheme in early 2016
- Prepare guidance for integration of councils into the scheme post official roll out
- Ensure SA Health resources are provisioned in place for the increase support required
- Refine the supporting materials for councils and businesses

- Prepare updated website and technical materials for release
- Continue to work and support for local councils on technical areas highlighted from the collected data
- Use learnings from pilot to begin addressing, with new and existing pilot councils, issues identified around inspection and enforcement consistency

5.2 Scheme roll out (commencing early 2016)

Key elements of this phase include:

- Ensure new councils are provided dedicated support to ensure a smooth integration into their current operating procedures
- Support pilot councils in their transition to the new scheme
- Follow the communication plan to seek consumer engagement and understanding
- SA Health to continue to support local councils operationally for a guaranteed 24 months, during which time data will be collected and assessed and modifications to the scheme will be actioned where required
- Support the addition of new councils into the scheme as per the process to be defined
- Use scheme learnings and insight to direct resources to target areas with a direct risk to food safety.

Appendix 1 – AFSA form (page 1 only)

AFSA Australian food safety assessment

Business Name		Ref No		Scheduled
Manager/Proprietor		Date	/ /	Follow Up
Premises Address		Time		Complaint
Business Phone		Officer		Other

Indicate compliance using ✓/✗ in "Complies?" column. If non-compliance is serious indicate by also inserting a * in the "Serious N/C" column.

		Complies?		Serious N/C	
Receiving					
1	Protection from contamination (3(1) of 3.2.2)			18	Food for disposal not sold/recall process (11, 12 of 3.2.2)
2	Identification/traceability of food (3(2) of 3.2.2)			Health, Hygiene & Knowledge	
3	Temperature control of PHF (3(3) and (4) of 3.2.2)			19	Health of food handlers – responsibilities (14 of 3.2.2)
Storage					
4	Protection from contamination (3(1) of 3.2.2)			20	Hygiene of food handlers - responsibilities (13, 15 of 3.2.2)
5	Appropriate environmental conditions (3(1) (b) of 3.2.2)			21	Food business – responsibilities (19, 16 of 3.2.2)
6	Temperature control of PHF incl frozen (3(2) of 3.2.2)			22	Adequate handwashing facilities (17 of 3.2.2 and 14 of 3.2.2)
Processing					
7	Safe and suitable food (2(1) of 3.2.2)			23	Food handling – skills & knowledge (3 of 3.2.2)
8	Protection from contamination (2(1)(a) of 3.2.2)			Premises and Hygiene	
9	Adequate cooking/processing (2(1)(b) of 3.2.2)			24	Cleanliness of premises, fittings, equipment (19 of 3.2.2)
10	PHF out of temp. control for min. time (2(2) of 3.2.2)			25	Cleaning/sanitising of food contact surfaces (24 of 3.2.2)
11	Cooling of PHF (2(3) of 3.2.2)			26	Suitability and maintenance of premises, fittings and equipment (21 of 3.2.2 and 23, 30, 11 & 12 of 3.2.2)
12	Reheating of PHF (17 (4) of 3.2.2)			27	Temperature measuring devices (22 of 3.2.2)
Display					
13	Protection from contamination (3(1) (a), (3) & (4) of 3.2.2)			28	Use of "single use" items (25 of 3.2.2)
14	Temperature control of PHF incl. frozen (3(5) of 3.2.2)			29	Control of animals and pests (24 of 3.2.2)
Packaging					
15	Appropriate materials and process (3 of 3.2.2)			30	Water supply adequate and potable (4 of 3.2.2)
Transportation and Distribution					
16	Protection from contamination (10) of 3.2.2)			31	Disposal of sewage and waste water (5 of 3.2.2)
17	Temperature control of PHF (10) & (2) of 3.2.2)			32	Storage of refuse & recyclable matter (6 of 3.2.2)
				33	Adequate ventilation and lighting (7 & 8 of 3.2.2)
				34	Storage of personal effects/chemicals (15 of 3.2.2)
				35	Adequate toilet facilities (16 of 3.2.2)

PHF means Potentially Hazardous Food. See over for definition.

#	COMMENTS/ACTION TO BE TAKEN	

Further Action? Nil Reinspection Letter Order/Notice Expiation Notice

Please attend to any outstanding items by the due date. For enquiries contact the officer on the number below.

I have read and I understand the contents of this assessment. Officer signature: Reinspection date:

Signature of proprietor/ staff: Officer contact No:

425355 © Environmental Health Australia

Appendix 2 – Pilot Standard Operating Procedures



Government of South Australia
SA Health

Food Safety Rating Schemes – Council Operating Guidelines

Food Safety Rating Schemes (the scheme), also commonly known as 'scores-on-doors' schemes, are used in Australia and overseas as a way of informing consumers about the food safety of businesses such as restaurants and cafés. The score or rating is calculated using the results of routine food safety inspections undertaken by local council Environmental Health Officers (EHOs). This score is then usually represented as a number, letter or stars and displayed at the business.

Providing consumers with information about the safety of food service establishments is an important way of helping them to make informed choices about where they decide to purchase food. This improved level of understanding then aims to drive an improvement in compliance with food safety legislation and in turn improve public health, through a reduction in food borne illnesses and reduced burden on Local Government re-inspection and enforcement responsibilities.

SA Health in collaboration with industry, local government and consumers has developed a scheme similar to schemes operating in NSW and the UK. On request from the Minister of Health, this scheme will be voluntary in its operation; focus on food safety elements for high and medium risk food service businesses and the first stage of implementation will be an assessed 12 month pilot.

Target businesses

In line and underpinned by the South Australia Food Business Risk Classification, this scheme will be targeted at high and medium food service businesses (P1 and P2).

Targeted businesses include:

- Restaurants
- Cafes
- Take-aways
- Bakeries selling ready to eat processed food (i.e. hot pies)

The scheme is not intended for supermarkets, school canteens, low risk food premises or those selling pre-packaged food i.e. pharmacies. Petrol stations that sell high risk hot food that have been prepared/hot held on site are likely to fall within the scope of the scheme.

In determining whether a business is within the main scope of the scheme, consideration should be given to the intent of the scheme. i.e. that the certificate is intended to help consumers choose where they purchase food for immediate consumption.

Any business that is subject to an EHO food inspection may be inspected using the pilot form, however only businesses that provide a food service element directly to the public (and based in public facing areas) will be offered a graded certificate.

If you have a business that would like to participate, but you feel does not fit into the above criteria – please contact SA Health using the details below for guidance.

N/O – not observed. NB most elements may be tested verbally if actual processes are not taking place during the inspection. The use of N/O should be minimised where possible.

✓ - compliant with the corresponding section of the FSC.

O – observation. This is where the element is not fully/completely compliant with the legislation but the inspector believes that the business will be unduly penalised by allocating a score to this element.

An observation should only be recorded if the non-compliance observed is very minor in nature and does not pose a direct food safety risk (i.e. a cracked tile away from food preparation surfaces). Deviations from the legislation which are 'out of character' with other elements of the inspection may also be recorded as an observation at the discretion of the inspector.

If a minor non-compliance is observed, that has been noted before, and could easily, reasonably and practicably be remedied then an observation must not be raised - but the full non-compliance score must be recorded.

Re-occurrence or accumulation of a minor observation, (e.g. accumulation of dirt and debris) must be scored as a non-compliance.

'score' – not compliant. The business has failed to demonstrate compliance with the requirements of the FSC for that element. The appropriate score (either 1, 4 or 8 as shown in previous column) for that element should be entered into the score column.

Inspections should be conducted at the existing inspection frequency based on the underpinning elements of the Food Business Risk Classification system. It is not the intention of SA Health that any extra inspections should be conducted as a direct consequence of this pilot.

Elements on the form have been weighted according to their direct potential food safety risk. i.e. 1 point = minor, 4 = moderate and 8 = serious risk to food safety.

Initial communication

It is requested that the EHOs outline the following information to the site manager / owner during the inspection and leave the 'Food Safety Rating Schemes: What does this mean for my business' leaflet onsite after the inspection.

- The display of the star rating is completely voluntary.
- The inspection will not be any different to usual, except the form to record the observations is different, and a score will be generated to reflect the outcomes of the inspection.
- Regarding non-conformances with the legislation, the council should act in the same manner as normally. After the inspection the form will be sent to SA Health to process and dispatch a Star Rating certificate.
- More information can be found in the leaflet.

Display of certificates

Businesses are allowed to position the Star Rating certificate in any position on the business site that was the subject of the inspection. If a business would like duplicate certificates or would like to display the material in any other place, (including online), they are requested to contact SA Health.

Certificate ownership

All certificates issued remain the joint ownership of the inspecting council and SA Health. If either of these parties believe there is genuine reason (such as a justified food complaint or food borne incident) why the business should no longer display this material it may be retrieved from the site. The operating council must inform SA Health if this material has been retrieved and the rationale for collection.

Distribution of Certificates

During the pilot SA Health will prepare the certificates based on the submitted inspection forms. These will be sent directly to the operating businesses or to the council to issue.

Re assessment of Inspection Scores and Star Ratings

Where required, operating councils should conduct follow up activities based on their normal procedures and protocols. A re-assessment of the inspection score should not be conducted at this time.

Due to resource constraints and to maintain consistency between the volunteering council areas, re assessment of scores will not be available until the next routine inspection. Businesses should still be encouraged to conduct remedial actions in a timely fashion. Councils are requested to note if this re assessment is requested and provide feedback to SA Health in follow up meetings for consideration as part of the post pilot analysis.

No inspection due

Due to the length of the pilot and the standard inspection frequency of inspections there will be some businesses that will not be inspected during this pilot period. On request to the council, any business that feels that they are being disadvantaged by not being able to display a certificate may request an 'Awaiting Inspection' certificate. This will be issued by SA Health where appropriate.

Appeals and grievances and complaints

Councils should act on complaints and grievances from inspected businesses or members of the public as per their current protocols. Where a complaint from the public is upheld, the council may choose to remove the Star Rating certificate.

Fees and charges

No excess fees/charges should be levied by the council for participating in this food safety rating scheme trial.

Pilot commitments

Council ⇄ SA Health

- Regularly pass inspection form and any supporting notes to SA Health
- Representative to inform SA Health of comments / grievances and resultant actions
- Commit to follow the guidance notes supplied to ensure consistency within and between volunteering councils
- Representative to attend the 'quarterly' meeting
- Representative to attend any ad-hoc meetings during and post feedback meetings

SA Health ⇔ Council

- Provide pre pilot training and support
- Supply supporting documentation, focused towards businesses and consumers
- Regularly update relevant councils with outcomes post inspection, i.e. issue of certificates etc
- SA Health commit to maintaining standards of consistence between and within volunteering councils
- Co-ordinate marketing activities to promote the scheme to the public
- Facilitate and arrange 'quarterly' meetings
- Facilitate and arrange ad-hoc during and post feedback meetings
- Maintain a secure database on inspection scores and star ratings.

Further information

If you have any questions please contact foodpolicyprograms@health.sa.gov.au or call (08) 8226 7100

Internal LG and SA Health Use only

Appendix 3 – Tailored pilot Inspection form and supporting notes

This assessment report reflects findings from data/time of inspection only

Business name	Date	Time	Ref No
Address	Inspection type		Risk Rating
Contact No.	Email		
ABN	Date of previous inspection		
Proprietor / Manager	Are all actions from previous inspection actioned?		
Person In Charge (at time of inspection)	Officer:	Date of next inspection:	

General		Result	Premises and Equipment (incl. Vehicles)		Result
1	Is the business correctly notified 3.2.2-4	1	23	Accessible hand washing facilities used only for washing, hands, face and arms 3.2.2-17: 3.2.3-14	4
2	The business does not pose a serious danger to public health and is fit for purpose? 3.2.3-3	8	24	Suitability and maintenance of Premises 3.2.2-21: 3.2.3-10,11	1or4
3	Food business responsibilities satisfactorily demonstrated 3.2.2 16/18	1or8	25	Suitability and maintenance of Fittings 3.2.2-21: 3.2.3-13/17	1or4
Received goods			26	Suitability and maintenance of Equipment 3.2.2-21: 3.2.3-12	1or4
4	Are protected from contamination 3.2.2 - 5.1	4	27	Adequate ventilation and lighting 3.2.3-7,8	1
5	Are traceable and accurately identified 3.2.2-5.2	1	28	Adequate toilet facilities 3.2.3-16	1
6	PHF received under temp control 3.2.2-5.3/4	4	29	Facilities provided for storage of personal / non food items 3.2.3-15	1
Transportation and Distribution			30	Water supply adequate and potable 3.2.3-4	1
7	All foods are protected from contamination 3.2.2-10: 3.2.3-17	4	31	Adequate disposal of sewage and waste water 3.2.3-5	1
8	PHF transported under time/temp. control 3.2.2 10	4	32	Adequate storage of refuse and recyclables 3.2.3-6	1
Recalls /Food disposal			33	Practicable pest exclusion, prevention and destruction measures used 3.2.2-24	1
9	Food for disposal is clearly identifiable and segregated 3.2.2-11	1	34	No signs of pest activity. (score 4 if in high risk areas) 3.2.2-24	1or4
10	Is there a suitable recall process in place 3.2.2-12	1	35	Accurate temp measuring device in use 3.2.2-22	4
Storage			36	Single use items (protected & disposed) 3.2.2-23	1
11	Goods are stored appropriately and protected from contamination 3.2.2-6:1a	4	Adequate Cleaning of:		
12	All foods stored under appropriate environmental conditions 3.2.2-6:1b	1	37	Premises (walls, floors, ceilings) 3.2.2-19.1	1or4
13	PHF stored under temp control 3.2.2-6.2	4or8	38	Fittings (e.g. shelving, ovens) 3.2.2-19.2	1or4
Processing			39	Equipment 3.2.2-19.2, 3.2.3-17	1or4
14	Safe and suitable food ingredients used 3.2.2-7:1a	4	Adequate Cleaning and Sanitising of:		
15	Foods protected from contamination 3.2.2-7:1bi	4	40	Eating and drinking utensils 3.2.2-20: 3.2.3-12	4
16	Foods processed adequately - in particular high risk foods 3.2.2-7:1bii	8	41	Food contact surfaces - including equipment (e.g. benches / boards) 3.2.2-20, 3.2.3.17	8
17	PHF foods are kept out of temp control for the minimum amount of time 3.2.2-7:2	8	Food handlers MUST		
18	PHF are cooled correctly 3.2.2-7:3	8	42	avoid unnecessary contact with RTE food or food preparation surfaces 3.2.2-13	4
19	Rapid reheating/hot holding of PHF 3.2.2-7:4	8	43	NOT prepare or handle food if suffering from a condition 3.2.2-14	8
Displayed foods			44	wear appropriate clean clothing/bandages, and minimise personal contamination of food/food contact surfaces 3.2.2-15.1	4
20	Are protected from contamination, are RTE self service food supervised and separate utensils provided 3.2.2-8:1,2,3,4	4	45	NOT eat, sneeze, spit, cough, use tobacco or similar over food/food prep surfaces 3.2.2-15.1	8
21	PHF displayed under temp control or time limit not exceeded 3.2.2-8:5	8	46	wash and dry hands as directed by 3.2.2-15.2,3	8
Packaging			47	wash hands using 'soap', warm running water and dry hands appropriately 3.2.2-15.4,17.1	8
22	Is the process and materials appropriate 3.2.2-9	1	48	demonstrate appropriate food handling - skills and knowledge 3.2.2-3	1or8

If NC is raised in any major (score 8) category, the business is withdrawn from the scheme irrespective of the final score.

5 Star = 0-3 points

4 star = 4-7 points

3 star = 8-11 points

12+ points = business ungraded

Total Score

Star rating

Quantified data formulated as part of the food safety rating system voluntary state wide pilot will only be used for informing the outcomes of this pilot and will not be released for any other purpose unless required by law.

Further action: (please circle)				
Nil	Re-inspection	Letter	Notice	Expiation
Inspecting officer				
Signature:		Contact no.:		
Owner / Manager / Employee				
Sign:		Print:		

Supporting notes Pilot form V2

1	Has the food business notified SA Health, are their details (name, address, nature and location) correct?
2	This section only to be used when an urgent or serious danger to food safety is observed. The intent of this element is to reflect the intent of using emergency powers (s.31 Food Act). Where the premises is unsuitable for purpose and results in a serious danger to public health i.e. there are missing walls / floors / ceilings / roofs scoring for the purpose of the Food Safety Rating scheme must cease. The inspection and appropriate follow up actions should continue as normal. This element should only be scored where it is deemed inappropriate to score specific deficiencies under other elements of the form (e.g. # 24-28)
3	Are food handlers aware and following the general procedures to ensure a hygienic environment (such as provision of handwash facilities) and safe environment when food handlers are unwell. Are food businesses taking all practicable measures to ensure people do not contaminate food and do not have unnecessary contact with RTE food.
4	All delivered food is protected from contamination. Where possible, food should be immediately inspected on delivery, checking for signs of contamination, checking the integrity of the packaging and the suitability of the transportation containers.
5	Can the source and content of the food be identified through the label or other mechanisms? Information on request should include name and business address of the vendor, manufacturer, packer or importer; plus the prescribed name or designation of the food.
6	PHF must be received under appropriate temperature control. i.e. frozen, below 5°C, above 60°C or a documented controlled period of time outside these limits.
7	Where food is being transported from or to the inspection premises, by the food business operating from that premise. Is food protected from contamination and damage to packaging during transportation? Is cross- contamination adequately prevented?
8	Where food is being transported from or to the inspection premises, by the food business operating from that premise. PHF must be transported under appropriate temperature control. i.e. frozen, below 5°C, above 60°C or a documented controlled period of time outside these limits.
9	Suitable systems are in place to ensure food for disposal is identifiable, segregated so not accidentally used or sold.
10	For food manufacturers/ importers and wholesale supply, are there systems in place to ensure the recall of unsafe food if required? Is this system documented and has been followed if required? NB all other businesses should record N/A on the inspection form.
11	Food is stored in such a way as to protect from contamination. Foods adequately covered, in appropriate containers in appropriate locations, adequately labeled and segregated i.e. raw foods separate from RTE foods.
12	Food is stored in appropriate environmental conditions so as not to adversely affect the safety and suitability of the food. Consider for example; temperature, humidity, and light levels.
13	PHF must be stored under appropriate temperature control. i.e. frozen, below 5°C, above 60°C or a documented controlled period of time outside these limits. Standard scoring is 4pts. 8 Pts must only be scored where the non-compliance relates to PHF that are not subject to further processing.
14	Have all practical steps been taken to process safe and suitable foods? Food should be checked prior and during processing for expired use by dates, for signs of contamination and deterioration.
15	Food must be protected from contamination during preparation.
16	Foods must be cooked / processed to ensure the microbiological safety of the food elements. Is the correct process used accurately and for the required period?
17	Foods should be kept out of temperature control for the minimum amount of time possible. E.g. are foods defrosted in a fridge / microwave, are foods returned to temperature control immediately after use?
18	Are PHF cooled safely? Can the business demonstrate 60 - 21°C within 2 hours and from 21 - 5°C within a further 4 hours?
19	Are PHF intended for hot holding reheated rapidly to 60°C?
20	Displayed food is protected from contamination. Unpackaged foods must be supervised, displayed with separate serving utensils (or other), and be protected by barriers. RTE food on bar or counter tops to be served must be adequately wrapped to prevent contamination.
21	PHF must be displayed under appropriate temperature control. i.e. frozen, below 5°C, above 60°C or a documented controlled period of time outside these limits.
22	Has appropriate packaging material been used. Suitable for food, it is clean and free from potential contaminants?
23	WHERE Permanent handwashing facilities need to be easily accessible within food areas if their hands are likely to be a source of contamination, used only for washing hands / arms / face. Separate basins will be required immediately next to toilets.
24	The premises (including vehicles) is designed, constructed and maintained in a good state of repair and working order with regard to its use. Regard should also be given to ease and effectiveness of cleaning and suitability for the business activities. 4pts must only be scored where there are multiple issues and a heightened risk to food safety as a consequence of these non-conformances.

Supporting notes Pilot form V2

25	The fittings are selected, installed and maintained in a good state of repair and working order with regard to its use. Regard should also be given to ease and effectiveness of cleaning and suitability for purpose. 4pts must only be scored where there are multiple issues and a heightened risk to food safety as a consequence of these non-conformances.
26	Equipment must be selected and maintained in a good state of repair and working order with regard to its use. Regard should also be given to ease and effectiveness of cleaning. A business must not use chipped, broken or cracked eating or drinking utensils for food handling. 4pts must only be scored where there are multiple issues and a heightened risk to food safety as a consequence of these non-conformances.
27	The premises must have adequate ventilation to remove fumes, smoke, steam and vapours; and adequate lighting for the activities conducted on site. Lighting and ventilation systems must be installed in such a manner as to not provide a risk of food contamination i.e. fluorescent tubes to be sheathed or covered.
28	Toilet facilities must be available for food handlers, these should meet the Building Code of Australia if within food preparation areas.
29	Separate adequate storage facilities must be provided for chemicals, clothing and personal belongings to minimise the risk of contamination of food and food contact surfaces.
30	A food business must use potable water for all activities unless they can demonstrate that the use of non-potable water will not adversely affect the safety of the food handled by the business.
31	An effective waste water and sewage system must be in place to ensure the effective disposal and ensure no likelihood of contamination of food or potable water supplies.
32	Recyclable waste and other rubbish must be: stored in enclosed containers, retained in areas designed to contain the volume and content of waste and to be easily and effectively cleaned.
33	EXCLUSION the business must prevent (with the exception of assistance animals and seafood, fish or shellfish) live animals in food handling areas. All possible measures, including screens and door closures should be taken to prevent animals and pests from entering the premises. PREVENTION / DESTRUCTION the business must take all reasonable measures to prevent and eradicate pests living in the premises.
34	INFESTATION signs of pest infestation; e.g. droppings, damage, live/dead pests. Score 4 where the infestation is either in a high risk area or the extent of the infestation poses a high potential risk for contamination.
35	Where a business is handling PHF a temperature measuring device that can measure to +/-1°C must be readily accessible
36	Single use items must be stored in a way to ensure that they are not contaminated before use, and that they are disposed of after use.
37	A premise must be maintained where there is no accumulation of food waste, dirt, grease, other matter or waste/ recyclable material except in appropriate containers and in acceptable volumes.
38	Fixtures/fittings must be kept clean of food waste, dirt, grease, or other matter than could potentially contaminate food or food surfaces.
39	Equipment must be kept clean of food waste, dirt, grease, or other matter than could potentially contaminate food or food surfaces.
40	Immediately before use, eating / drinking utensils must be inspected to ensure they are in a clean and sanitary condition.
41	Food contact surfaces and preparation equipment e.g. knives, boards and tongs must be inspected to ensure they are in a clean and sanitary condition.
42	A food handler must take all reasonable measures not to handle food or surfaces likely to come into contact with food that could compromise the safety and suitability of food.
43	Food handlers must not handle food or undertake any activity that may contaminate food, if they are suffering from or believe they may be suffering from a food borne disease or a condition that may contaminate food. Food handlers must know that they have a requirement to notify in the case of potential / actual contamination. Ignorance of employees to these elements indicates a non conformance of food business responsibilities (Q.3)
44	Food handlers must take all practicable measure to ensure food and food surfaces are not contaminated, by: e.g. wearing appropriate and clean clothing, minimising jewellery, tying hair back, ensuring bandages / dressings are completely covered and waterproofed.
45	Food handlers must not spit, smoke, use tobacco or similar and handle mobile phones in areas where food is handled.
46	WHEN a food handler must wash their hands immediately before commencing / re commencing handling food, when their hands are likely to be a source of contamination, after handling raw food, immediately after using the toilet, immediately after smoking, coughing, sneezing, using a tissue, eating / drinking, smoking, handling their mobile phone or touching their hair / scalp or body opening.
47	HOW a food handler must wash their hands using soap (or equivalent) with warm running water and dry hands thoroughly in a way that will not transfer pathogenic microorganisms. This element includes the requirement to ensure the handwash basin is provisioned with items needed to wash hands correctly.
48	A business must ensure all persons have appropriate knowledge and skills in food safety and hygiene that is appropriate to their work activities.

Appendix 4 – Example pilot certificate

2014-2015 pilot

Food Safety Rating



A N Other, Rundle Mall
(ABN 20091070)

achieved an
EXCELLENT food safety rating
at their routine inspection on 2 JULY 2015

For more information on the Food Safety Rating Scheme visit
www.sahealth.sa.gov.au/foodsafetyratingscheme

This certificate remains the property of the issuing council and SA Health and may be removed at any time. This rating is issued based on the findings of a food safety assessment carried out in accordance with food legislation by an authorised officer of the council on the date indicated. The rating is given in good faith and is intended as a general guide only. The council makes no representation, gives no warranty and will not be liable 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.




Government
of South Australia
SA Health



DELAIDE
CITY COUNCIL

Appendix 5 – Consumer leaflet (A5 double-sided)


South Australian Food Safety Rating Scheme Pilot



Food Safety Rating Schemes are used as a way of informing consumers about the food safety practices of food service businesses such as hotels, restaurants and cafés. The Star Rating is calculated using the results of routine food safety inspections undertaken by local council Environmental Health Officers (EHOs).

Providing information about the food safety of these businesses is an important way of helping consumers to make informed choices about where they decide to purchase food.

A voluntary Food Safety Rating Scheme (the Scheme) has been developed in conjunction with industry, consumers and local government, for use in South Australia. A 12 month pilot to test the feasibility and benefits of this Scheme will commence in October 2014.



South Australian Food Safety Rating Scheme Pilot

The ten councils participating in the pilot are:

- > Adelaide City Council
- > Adelaide Hills Council
- > Wattle Range Council
- > District Council of Mount Barker
- > City of Holdfast Bay
- > City of Onkaparinga
- > The Rural City of Murray Bridge
- > City of Tea Tree Gully
- > City of Salisbury
- > Mid Murray Council

Food service businesses within these council areas that achieve a high degree of compliance with Food Safety Standards at the time of the inspection will be awarded one of the following ratings:

- ★★★★★ 5 Stars – Excellent
- ★★★★☆ 4 Stars – Very Good
- ★★★☆☆ 3 Stars – Good

Businesses that do not meet the food safety standards in critical areas, and / or in many minor areas will not be awarded a Star Rating. These businesses will be asked to undertake work to resolve identified problems within a set timeframe (as per normal practices). Display of the Star Rating certificate is completely voluntary for businesses and, during the pilot, information regarding these scores will not be released by the Councils or SA Health.

Not all food businesses are part of this voluntary Scheme and due to council work schedules, some businesses may not receive a routine inspection during the pilot period. Therefore, just because a business is not displaying a certificate, does not mean that the business activities are unsafe. If you are unsure... ask the business owner or your local council.



If you would like more information about this Scheme please visit our website www.sahealth.sa.gov.au/foodsafetyratingscheme, contact SA Health on foodpolicyprograms@health.sa.gov.au or call (08) 8226 7100 or contact your local council environmental health team.



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Appendix 6 – Business leaflet (tri-folded)

You will also need to have good practices in place to ensure you clean and maintain equipment, prevent cross contamination and ensure your staff maintain hygienic practices at all times. Taking these steps can lead to a lower score and as a result you can achieve a higher star rating.

The inspection form that the Council EHO will use is available to download on www.sahealth.sa.gov.au/foodsafetyratingscheme and can be used to perform your own self check prior to your routine inspection.

Can I be re-assessed if I undertake the remedial actions?

Local Councils do not have the resources to conduct extra rating inspections for the purposes of this pilot. You will still be required to undertake any corrective actions as directed by your EHO, and as part of this you may receive follow-up visits. However, your Star Rating will not be assessed until your next routine inspection.

How do I become part of the pilot program?

All you need to do is ensure you are meeting all legislative requirements and then wait until your next routine inspection.

After your inspection, SA Health will provide you with your certificate to display on site.

Your certificate will indicate to your customers the food safety rating you have achieved. This transparency will build trust and confidence in your business's ability to manage food safety.

Over time, more businesses will be inspected and the general public will become better informed of the scheme. This will encourage poorer performing businesses to improve their food safety compliance.

This, in the long term, will translate into improved public health across our state.

For more information

See www.sahealth.sa.gov.au/foodsafetyratingscheme

Contact your local Council

Or

SA Health Public Health Services

Telephone: (08) 8226 7100

foodpolicyprograms@health.sa.gov.au



www.ausgoal.gov.au/creativecommons

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Food Safety Rating Scheme

What does this mean for my business?

Information for Businesses
October 2014



What is the Food Safety Rating Scheme?

The Food Safety Rating Scheme (the scheme) is an initiative that is being piloted by SA Health under the *Food Act 2001* at the request of the Minister for Health. The voluntary scheme allows for a score interpreted from routine council food premises inspections to be displayed at food service businesses, such as restaurants, cafés, take-away shops, pubs and bakeries. The score will inform customers of how well a food business complies with food safety standards contained in the Australia New Zealand Food Standards Code and in particular the direct risk to food safety.

Your local Council has chosen to participate in this state wide 12 month pilot.

What does Council participation in the pilot mean for my business?

Ultimately there will be little difference to your routine inspection.

Routine Council food premises inspections will continue to focus on assessing compliance with food safety standards.

The inspection will focus on the food safety risks associated with the foods you handle and how you prepare them. Businesses will still be expected to carry out corrective action as required by the Council Environmental Health Officer (EHO). There will be no additional burden to your business as a consequence the scheme.

What are the differences?

There are three key differences you may notice:

Firstly the inspection findings will be recorded on a different form. This form will display more information than previous versions but will not change the nature of your inspection.

Along with written findings the outcome of the inspection will also be scored. The lower your total score, the better your overall food safety result. Points will be added where you are not compliant with food safety standards.

Lastly, a copy of your completed inspection form will be passed on to SA Health. They will convert the Inspection Score into a Star Rating and dispatch a certificate for you to display at your business if you wish. **You are not obliged to display the certificate.**

What if I am not due to have an inspection in the 12 months during the pilot?

No additional inspections will be conducted as part of the pilot. If you believe that your business will be unduly disadvantaged by not having an inspection during this period please contact your local council to discuss.

How is my business rated?

All elements that are currently inspected against are displayed on the inspection form. These are coupled with a risk rating score. This score reflects the risk that non-compliance may have on the overall safety of the food, e.g. actions associated with food handling and preparation carry more risk than minor structural issues and therefore will be given a higher score if the business is not compliant with food safety standards.

Each time a non-compliance is noted, a score will be given. At the end of the inspection all scores are added up and converted to a Star Rating. Lower inspection scores indicate better food safety and more stars awarded.

1-3 points = 5 Stars and an Excellent rating.

4-7 points = 4 Stars and a Very Good rating.

8-11 points = 3 Stars and a Good rating.

Sites that score 12+ points or are non-compliant in any major area will be considered to have a higher food safety risk and as a consequence will require corrective actions and will not receive a Star Rating certificate. Local councils will be able to provide general advice to assist businesses to achieve improvements.

You will still need to undertake any corrective action required by the Council EHO regardless of your final score.

How to maximise my Star Rating

Scoring is weighted to increase scores where high food safety risks are identified.

To get the best rating you should ensure that you understand the food safety risks associated with the foods you prepare and sell and that you have controls in place to manage these risks.

For more information

SA Health
Food and Controlled Drugs Branch
11 Hindmarsh Square
Adelaide
SA 5000
Telephone: 088226 7100
www.sahealth.sa.gov.au

Public I1-A1



www.ausgoal.gov.au/creative-commons



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