



FOOD SAFETY RATING SCHEME (FSRS) REVIEW REPORT 2018-19

A step towards
improved safe food culture

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PURPOSE AND OBJECTIVES

Purpose

The purpose of this report is to provide an evaluation of the Food Safety Rating Scheme (FSRS or the Scheme) following its introduction in April 2016.

Objectives of the Scheme

The FSRS is a powerful non-regulatory tool which aims to:

- > **Improve compliance** of food businesses by encouraging them to comply with food safety legislation and ultimately reduce incidences of food poisoning.
- > **Inform consumers** about the food safety compliance of a food business in the form of star ratings so that they can make an informed choice about where they decide to purchase food.
- > **Analyse** the inspection data and identify the core issues of food safety across the state that help develop effective educational programs and communication methods that improve compliance and food safety management in a timely manner.

Nationally there are increasing incidences of foodborne illness outbreaks. These are often linked to inadequate food handling practices and a lack of food safety skills and knowledge in food service businesses. There is significant work occurring at a national level under the *Australia's Foodborne Illness Reduction Strategy 2018 – 2021+* to attempt to address this increase (see Appendix 1.) The adoption of a food safety rating scheme is an additional state based tool that supports this essential work program.

EXECUTIVE SUMMARY

From October 2014 to July 2015, SA Health in conjunction with nine local councils conducted an eight month pilot of the Scheme. After the successful pilot, the Scheme was officially launched state-wide in April 2016. During the development of the overarching principles of the Scheme, it was decided that SA Health would conduct a formal review of the Scheme after two years of its operation. This review process was initiated in August 2018.

Review mechanism – SA Health collected feedback on various aspects of the Scheme in order to determine if the Scheme in its current format is effective and meeting its objectives. The review also intends to identify whether improvements are required, and whether any opportunities exist to improve the Scheme to be more effective and user friendly. Feedback on these aspects was gathered from two distinct stakeholder groups (consumers and food businesses) in the form of online surveys. Feedback from local council regulators, who are conducting food safety inspections, was also collected using face to face meetings and phone interviews. This is the first time SA Health has access to all food inspection reports of businesses in the participating council areas that are covered in the scope of the Scheme. Data from these inspection reports was also analysed as part of the review process to determine the compliance trends and identify the nature of non-compliances.

Consumer feedback – Consumer responses received as part of the review were very valuable in determining consumer awareness, recognition, use and perception of the FSRS. The majority of consumers had positive opinions about the Scheme. They welcomed the transparency provided by government to share inspection scores in the form of a star rating. There was a common belief that the Scheme will drive a positive food safety culture in South Australia. Many consumers commented that the Scheme needs more widespread ongoing promotion to increase effectiveness.

Food business feedback – The feedback from food businesses identified that the Scheme has helped improve compliance with food legislations. This was one of the Scheme's primary objectives. Analysis of inspection data by SA Health supports that the statewide compliance rate of the participating businesses has improved from

54% to 65% (11% improvement) since the launch of the Scheme. The food businesses that are not covered by the Scheme also showed interest in the FSRS.

Survey responses from food businesses in participating council areas were helpful in determining key factors of the inspection process such as acceptability, trust in the new inspection process, and knowledge shared by Environmental Health Officers (EHOs).

Survey responses from the food businesses in non-participating council areas were helpful to determine their awareness, interest level and perception of the Scheme.

Participating councils feedback – Responses from the councils were mixed. While a majority of the participating councils agree the Scheme has helped their businesses to improve compliance, some councils believe that compliance has improved in only those businesses where the proprietors were well engaged in the process. There is a perception that the Scheme would not be completely utilised unless all food business proprietors are fully engaged, which may only be possible if the Scheme becomes mandatory.

Non participating councils feedback – The majority of non-participating councils believe the Scheme has potential to improve compliance. While some councils are theoretically willing to implement the Scheme, they are unable to do so due to perceived resource issues. Some regional councils see no added value in implementing the Scheme because of the limited number of food businesses in the areas. However, they recognise the value in using the Scheme in metropolitan areas where there is a perceived competition between businesses. They believe that competition is a factor that encourages businesses to improve their food safety compliance rating and would benefit from the display of a star rating certificate to attract more customers.

Based on feedback from stakeholders and analysis of inspection data from participating businesses, it is evident that the Scheme is helping food businesses in South Australia to improve their compliance. Furthermore, the data is identifying the key food safety concern areas across the state and in the individual councils. This information is very useful for both councils and SA Health to target their resources effectively.

BACKGROUND

Background to the SA Food Safety Rating Scheme

In 2010, the House of Assembly, on a motion from Hon. Mr 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 about the results of food safety inspections and non-compliances with the *South Australian Food Act 2001*.

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 risk food service businesses in SA, similar to those already operating in some local council areas across 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 'rating' that is displayed on the door of the business for consumer information.

Pilot project

The pilot SA Food Safety Rating Scheme (the pilot) was developed as a collaboration between SA Health, local food businesses, local councils and consumers, and commenced on 6 October 2014. The pilot was a 5 star Scheme, with 5 stars representing excellent compliance with food safety standards, whereas 4 and 3 star certificates were awarded for 'very good' and 'good' compliance respectively. The pilot captured P1 and P2 food services businesses (see SA Health website for Priority classification of food businesses) like restaurants, cafes, take-away shops, bakeries, caterers and petrol stations selling high risk hot food that have been prepared/hot held on site in the volunteering council areas that were due for a routine inspection during the pilot period. The frequency and execution of inspections conducted under the pilot were no different to usual, except for the use of a tailored inspection form to record the inspection findings.

The tailored inspection form required 48 elements to be assessed and scored either as compliant with the legislation, non-compliant, not observed, not applicable, or as an observation. Non-compliant elements were weighted and assigned a pre-set score based on their potential risk to food safety as determined by the local council Environmental Health Officer (EHO). The total inspection score was then converted into a star rating. The food businesses that achieved a star rating of 3, 4, or 5 were awarded a certificate which could be displayed at the discretion of the business owner.

The pilot Scheme was specifically developed to not cause any additional burden to businesses and to minimise additional burden on participating councils. The pilot commenced with nine actively participating councils. After nine months of operation, 1032 inspection reports had been received and analysed by SA Health. At this point, due to the significant amount of data gathered and the positive feedback provided by the pilot councils, the Department strongly recommended to the then Minister for Health and Ageing, that the project pilot should be refined and rolled out state-wide for a period of 24 months. More detail about the pilot can be found in the Interim Food Safety Rating Scheme Pilot Assessment Report.

The current scheme

The design of the certificate, scope and operation of the current Scheme remains identical to that used in the pilot, with the only variation being minor changes to the inspection form. Some of the elements on the inspection form were combined resulting in a total of 44 elements compared to 48 elements in the old version used during the pilot.

In summary: The Scheme remains voluntary for local councils to participate and for businesses within the participating local council areas. Businesses are able to choose whether or not they display a certificate issued to them.

All P1 and P2 food service businesses captured within the scope of the Scheme in the participating council areas are inspected using the dedicated inspection form, and if eligible receive a certificate.

The Scheme has two facets:

1. The food business 'inspection score' – calculated by the local council at their routine inspection, and recorded on the inspection form.
2. A certificate – to be displayed on the business premises to inform the general public in the form of a star rating. The provision of this interpretive information may then assist the consumer in their choice of an eating establishment.

The inspection form (Appendix 2), records compliance with the national Food Standards Code, specifically food safety standards 3.2.2 and 3.2.3, by assessment against 44 elements. For each element the following inspection outcomes may be recorded (Table 1).

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

Inspection outcome	Notes
C	<i>Compliant</i> with the legislation.
NA	<i>Not Applicable</i> to this inspection, e.g. not all food business requires documented recall plan.
NO	<i>Not Observed</i> at the time of the inspection the EHO did not see, or was unable to ascertain through directed questioning whether the element is being complied with or not.
O	<p><i>An 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 (e.g. 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 again. 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)	<i>Non-compliant</i> with the legislation, record the score as directed on the inspection form.

Each element has points assigned against it by the EHO if the business is not compliant with the legislation in that area. A prescribed 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

For a few elements, 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.

All individual scores calculated are combined. The final inspection score is then translated into a star rating category using the following criteria (Table 2).

All inspection forms are submitted to SA Health by the local councils and a star rating certificate is issued where required (Appendix 4). The data received from the local councils is retained in a confidential database. Periodically local councils are provided a summary of their data from submitted inspections.

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

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 14 – <i>'All foods 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.

THE SCHEME TWO YEAR REVIEW

The Minister for Health and Wellbeing approved a review of the Scheme being initiated in August 2018. The experiences, impressions and perceptions of the Scheme from all stakeholders in the form of their feedback have been collated and analysed to complete this review (see Appendix 5 for data collection methodology). Additionally, food business inspection findings between March 2016 and June 2019 were analysed as part of this review process.

Currently, 21 local council areas are fully participating in the Scheme.

- > **Adelaide City Council**
- > Adelaide Hills Council
- > **City of Charles Sturt**
- > Town of Gawler
- > **City of Holdfast Bay**
- > Mid Murray Council
- > **City of Mitcham**
- > District Council of Mount Barker
- > City of Mount Gambier
- > Rural City of Murray Bridge
- > **City of Onkaparinga**
- > **City of Port Adelaide Enfield**
- > **City of Playford**
- > **City of Salisbury**
- > **City of Tea Tree Gully**
- > **City of Unley**
- > **City of West Torrens**
- > Yorke Peninsula Council
- > **City of Marion**
- > City of Victor Harbour
- > Coorong District Council

Twelve councils are in metropolitan areas (bolded) and the remaining 9 are in non-metropolitan areas.

This covers approximately 72% of the SA population.

During the period from March 2016 to June 2019, 11076 inspections were submitted to SA Health for collation and issue of certificates. Not all current participating local councils have been participating since March 2016, some councils joined later in 2016 or 2017-18. Also, while some councils have chosen not to engage in the state-wide system, they have adopted the scheme principles in the inspection process and are using the Scheme inspection form to conduct their food inspections.

The main reasons for these council (operated under a subsidiary arrangement) not participating in the Scheme are the perceived inconsistency of the inspection process within participating councils, and the Scheme not being mandatory. If these councils came on board the Scheme would cover over 80% of SA's population.

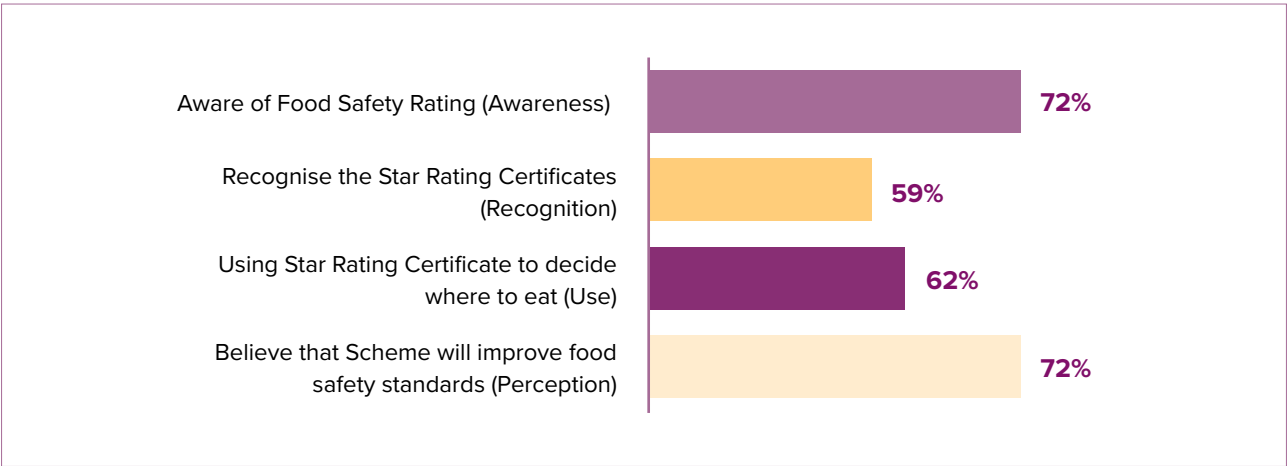
Survey Statistics

Two online surveys were hosted on the YourSAy (state-wide online engagement platform) website between 23 August 2018 and 30 September 2018. The surveys were promoted on Facebook, Twitter and via email to food businesses by councils. These surveys achieved a reach of 43,354 people which resulted in 142 responses from consumers and 89 from businesses.

Consumer feedback

Consumer surveys were aimed to capture levels of awareness, understanding, usage and perception of the Scheme from consumers. Of the consumer responses, 87% were from consumers living in council areas participating in the Scheme, with 13% from non-participating council areas.

Figure 1: Consumer Feedback parameters



Food business feedback

Of the business responses, 90% were based in participating councils and 10% in non-participating councils. From all food business responses, 34% of businesses acknowledged they are captured by the Scheme, 62 % were unsure and 4% responded that they are not covered by the Scheme.

Food businesses in participating council areas

All business operators in participating council areas responded that they were made aware of the Scheme by their local council EHO and 96% were pleased that they were captured. The figure below outlines three key parameters (Acceptability, Trust and Knowledge) measured through the online survey.

Food businesses in non-participating council areas

36% percent of businesses in non-participating councils would like to be a part of the Scheme, 50% were unsure and 14% do not want to be captured by the Scheme. The reasons for this are unknown but it may be due to the lack of awareness about the benefits of being involved in the Scheme, or perception around extra burden caused by participation. Figure 3 outlines three key parameters (Awareness, Interest Level and Perception) that were measured through the online survey.

Figure 2: Food businesses (in Participating council areas) Feedback parameters

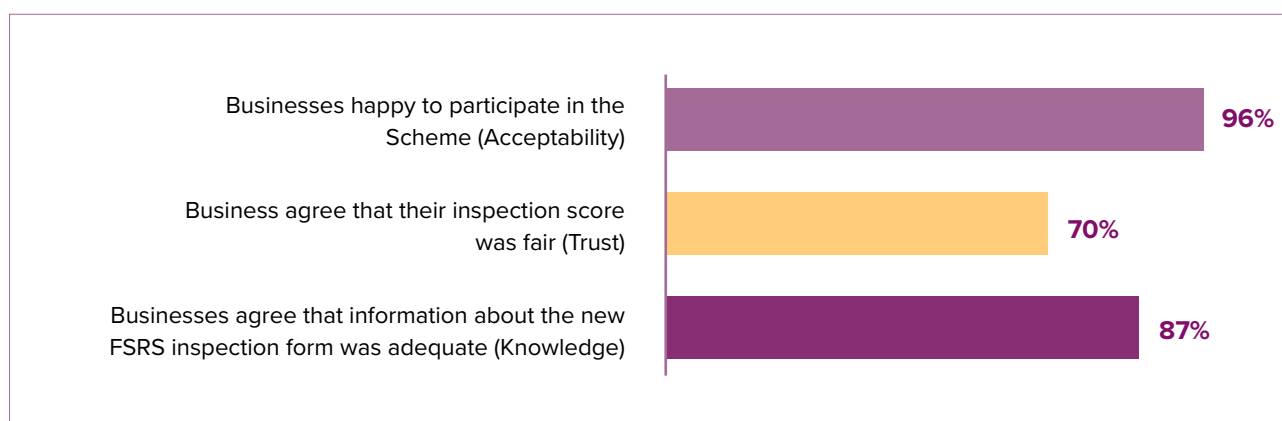
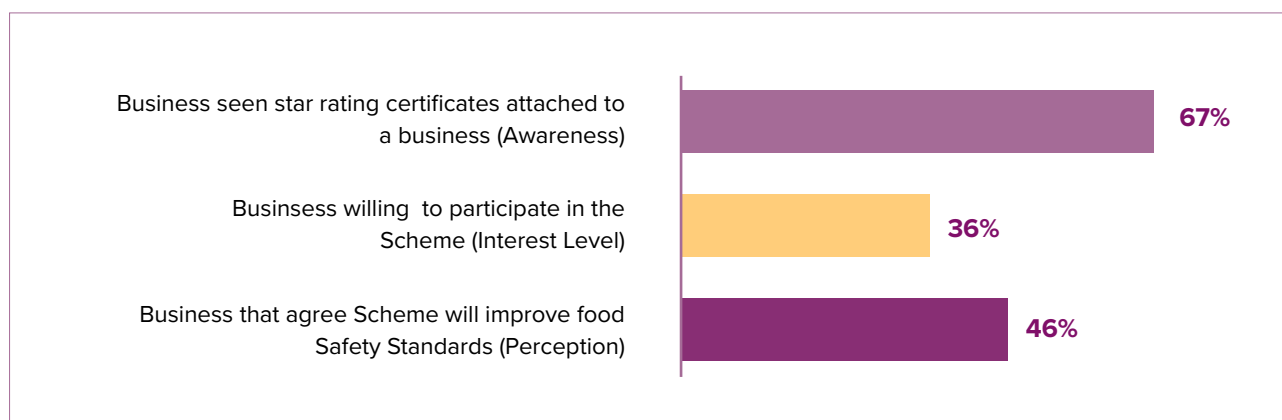


Figure 3: Food businesses (in Non-Participating council areas) Feedback parameters



Council feedback

Participating councils

Participating councils indicated that the Scheme is working well, and acknowledge benefit from using the Scheme. The Scheme allows inspections to focus on risk, and although it takes a little longer to complete, it allows for a better business understanding and promotes targeted discussions with businesses around areas of non-compliance. Both the inspection form and the certificate are seen to be adequate, however councils have proposed range of minor improvements to design. Changes in the inspection form could be helpful in its effective use by councils, and improve understanding to the business around the inspection process. A change in design of the certificate could be helpful for consumers to improve their understanding and awareness about the Scheme.

Participating councils perception of food business engagement is diverse and is highly dependent on factors including the proportion of tourist visitors, levels of business competition, proficiency of English language spoken by food business staff, and the demographics of food business customers. However, it is generally agreed that businesses with a good general food safety culture and understanding, along with businesses that are owner operated, are happier to engage in the Scheme. New businesses and businesses that change ownership also have better engagement.

There are divided opinions about the scope of the Scheme. Some believe it should be extended to P3 businesses to include supermarket activities and mobile vendors; however others are happy with the current scope. It was however, agreed by all that P4 (lower risk) businesses should not be captured.

The current inspection form does not have any provision to capture information regarding how businesses are displaying their certificate. Therefore participating councils have no data around the number of businesses displaying the certificate in the public domain. There may be value in exploring the collection of this information in evaluating public perception and effectiveness of the program.

Generally, it is understood that businesses receiving high scoring certificates (i.e. 4 or 5 stars) are more inclined to display their certificates compared to businesses that receive 3 stars. Display of certificates is voluntary.

Consistency of council inspections was expressed as a concern between participating councils. However, none of these issues were raised by businesses that completed the survey.

Non participating councils

The majority of non-participating councils are located in regional and remote areas of South Australia. Food businesses in these communities are typically small in numbers, and in many cases there are no choices for consumers, which negate one of the primary objectives of the Scheme.

Feedback received from these councils indicates that the decision not to participate in the Scheme was based on a lack of appetite for engagement from food businesses, and perceived extra resource issues for councils. In the case of resourcing, it was not always perceived that there was a great deal of additional work required to participate in the Scheme, but EHO resources were already heavily or fully committed to delivering current mandatory legislative requirements. Their feedback indicated that they were not opposed to the Scheme but would prefer that the Scheme was mandated along with publishing results of the Scheme and having them publicly available. There is a perception that these changes will make the Scheme more effective and they can also justify extra resources for a mandatory requirement.

Survey feedback and data analysis were also used to review whether Scheme objectives were delivered.

OBJECTIVE 1

Encourage Food Business Compliance with Food Safety Legislation

The inspection data submitted from participating councils has been assessed. The current data (when compared with the baseline set by the pilot) indicates that food businesses on average have improved their rates of compliance with the food safety legislation. Generally, participating local councils believe that the Scheme has the potential to drive improved compliance with food safety standards, especially in food courts or where competition between businesses is high. Where there is an apathetic or disengaged owner, the impact of the Scheme is believed to be limited and this may only be improved by making the Scheme mandatory which would require display of a certificate regardless of the inspection outcome.

Of the 142 consumers that responded to the online survey, an overwhelming 72% believed that the Scheme will improve food safety standards in food businesses (Figure 4). Only 48% of participating businesses believed that it had encouraged them to improve their compliance with food safety standards (Figure 5), compared to 46% of non-participating businesses that thought the Scheme would improve their compliance with the food safety legislation (Figure 6).

Figure 4: Consumers response

Do you think the Scheme will have a positive impact on food safety standards in food service businesses?

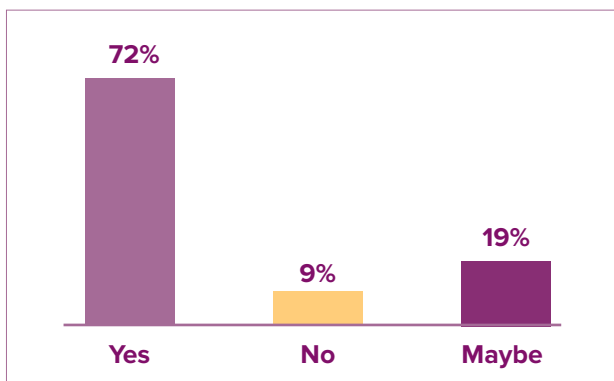


Figure 5: Participating businesses response

Do you believe the FSRS has encouraged you to improve your compliance with food safety standards?

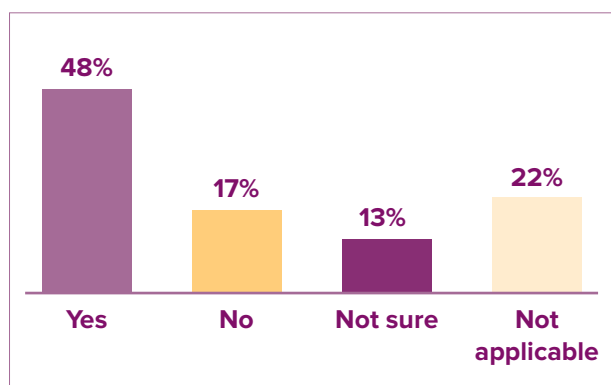
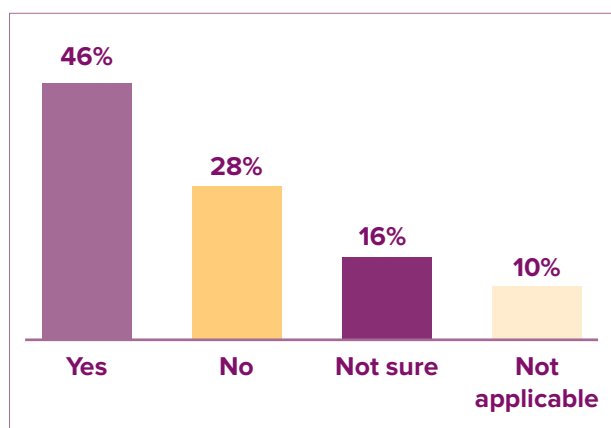


Figure 6: Non participating businesses response

Do you believe participating in the FSRS would encourage you to improve your compliance with food safety standards?



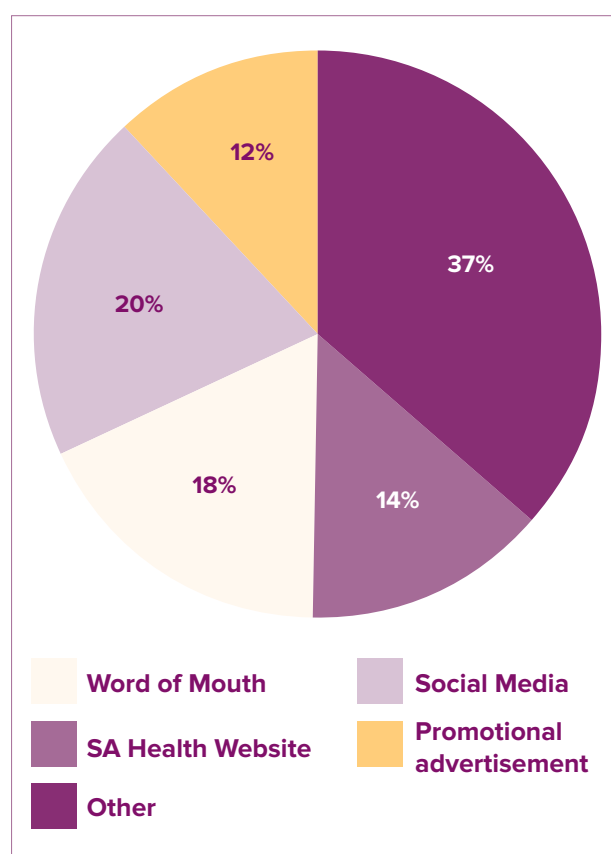
OBJECTIVE 2

Provision of Information to Customers

In the initial phase customers were made aware of the Scheme via press advertisement, table top decals at selected shopping plazas, paid Facebook advertisement and an animated video published on the SA Health website. A2 size posters were also displayed for four weeks at the Adelaide Central Market and other venues including cafes, snack bars and shopping precincts. Scheme pamphlets designed for consumers were distributed by councils through the participating businesses to the consumers. A webpage hosting the animated video is available on SA Health website.

Of the consumers that responded to the online survey, 20% responded that they became aware of FSRS via social media, closely followed by word of mouth (18%). 37% said most of their awareness of the Scheme had been generated by other means, including working in local government, studying the Scheme as part of a university project, reading the local newspaper, visiting the local council website or working in food industry etc. (see Figure 7).

Figure 7: Consumers: How did you become aware of the Scheme?



62% of consumers stated they would use the Scheme to make an informed decision about where to eat, while 84% would or might change their mind if the business was displaying a 3 star certificate. Consumer survey feedback indicates the Scheme has the potential to improve compliance with food safety standards. However, the number of customers that comment on, or ask a food business about their Food Safety Rating was very low. (Figure 8 and Figure 9).

Figure 8: Participating businesses

How often do customers comment on, or ask about your FSRS?

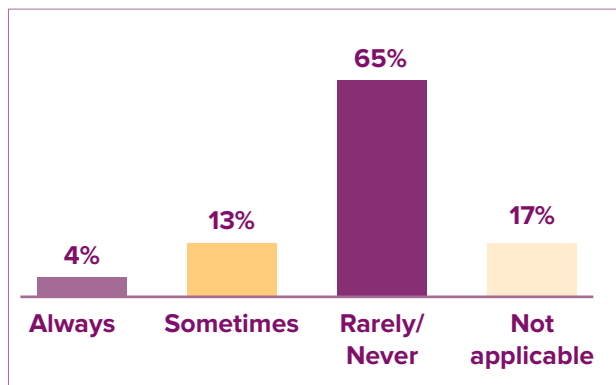
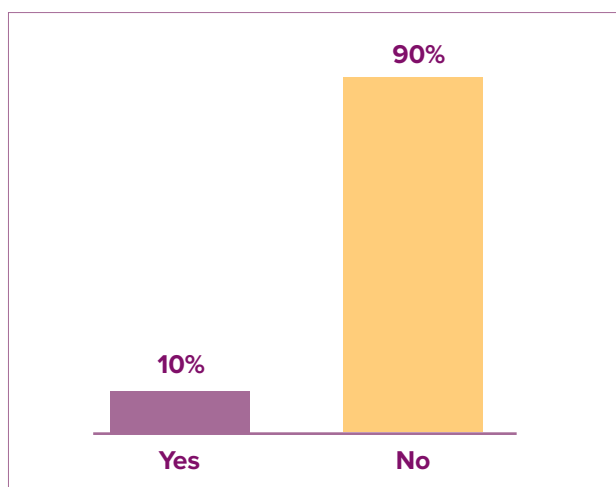


Figure 9: Non- participating businesses

Have you ever been asked about the FSRS by a customer?



Only 22% of participating businesses believe that displaying a certificate will have an impact on their business (Figure 10). However, 46% of those not captured by the scheme believe that displaying a certificate would attract more customers or have a positive impact on their business (Figure 11) and if they could, 60% of non-participating businesses would display a certificate.

Figure 10: Businesses in participating areas

Does displaying FSRS certificate have an impact on your business?

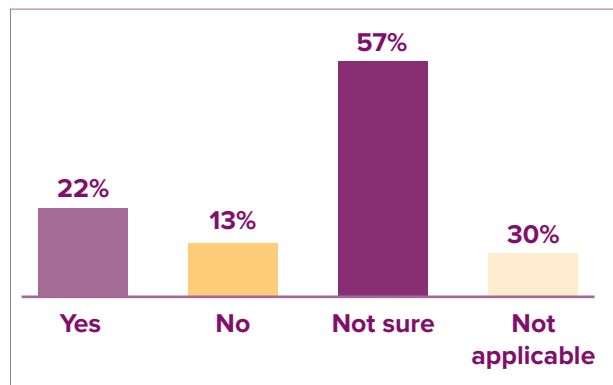
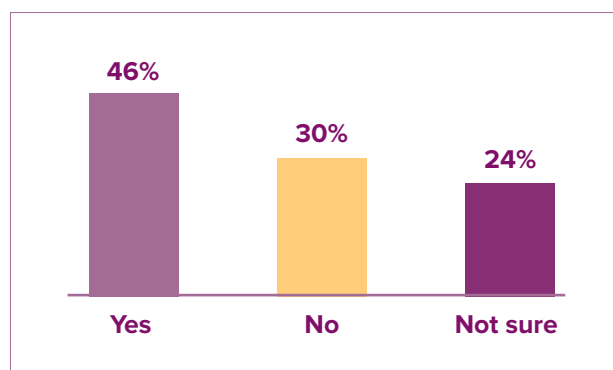


Figure 11: Non-participating businesses

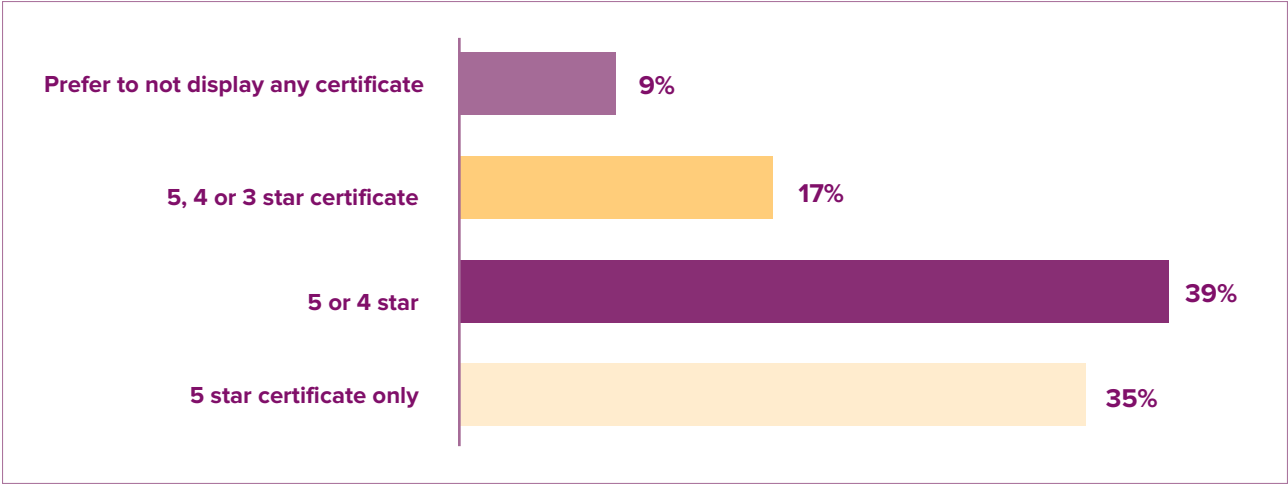
Would displaying FSRS certificate attract more customers or have an impact on your business?



The survey results indicate that participating businesses are still not certain of the impact of the Scheme, but believe that displaying a 3 star certificate would not be beneficial as consumers do not understand the Scheme.

Figure 12: Participating businesses response

Participating Business Response: Which FSRS Certificate would you display at your business?



Participating councils are in agreement that there is limited awareness of the Scheme by consumers. Improving consumer awareness is essential to drive the long term effectiveness of the scheme and would help drive improved compliance with the food safety standards.

OBJECTIVE 3

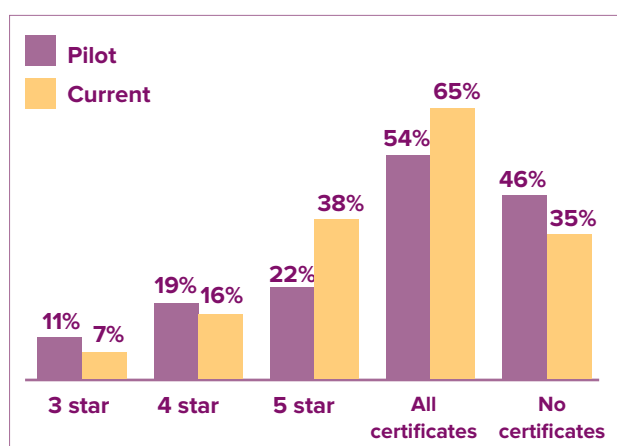
Data Collection and Analysis

Inspection data submitted from participating councils has been assessed from 1 March 2016 to 30 June 2019. This represents the period of full release of the Scheme to date, and where appropriate, data was compared to that collected from the nine month pilot period (6/10/14-2/7/15).

The current data (when compared with the baseline set by the pilot) indicates that food businesses on average have improved their rates of compliance with the food safety legislation.

11,076 inspection reports have been submitted to SA Health from the 21 participating councils between March 2016 to June 2019. Of these, 65% resulted in the issuing of a certificate (3, 4, or 5 star), an increase from the 54% issued during the pilot period (11% improvement in compliance). A breakdown of these inspection outcomes indicates that the majority of this change is due to an increase in the issuing of 5 star certificates from 22% to 38% (16% improvement in compliance).

Figure 13 Direct comparison of percentage compliance status during pilot vs current full scheme



In-depth consideration and analysis of the real time inspection data provides valuable information to enable councils and SA Health to target specific technical initiatives which should further improve this trend.

The pilot results were actively communicated to the operating councils. With ongoing emphasis on the top concerning areas (hand washing & cleaning and sanitising), EHOs worked together with businesses to address these high risk elements which affect their inspection score. This targeted focus would have resulted in improving compliance for these elements. Hand washing, cleaning and sanitising were top concern areas identified during pilot and there is significant decrease in non-compliance in these areas over the two year period.

One major change noted between the pilot and current data is the use of the Observation (O) scoring option. An 'Observation' is recorded when a business is not strictly compliant with the food safety legislation, however the deviance is not deemed 'bad' enough to issue a non-compliance score against the element (1,4,or 8). This scoring option (Observations) was used considerably during the pilot, however the use of 'Observations' has significantly reduced as regulators become more confident with the Scheme.

Consistency between how EHOs interpret the inspection findings into foodborne illness risks was one of the initial concerns raised by local councils and a perceived concern from food service businesses at the inception of the Scheme. Where there is likely to be human interpretation of a situation there is the possibility of varied responses. SA Health is of the view that by adopting a wide range of supporting mechanisms under the Scheme, the variation between individuals and local councils is being addressed to a point where locally competing businesses can be confident that they are being treated uniformly.

This drive towards minimising inconsistency is being supported by the provision of an EHO Toolkit. This kit is a guidance document designed for EHOs to assist them in understanding the technical components of the Scheme and the scoring criteria for the non-compliant elements. In many councils the toolkit has been used extensively and is now referred to primarily by new EHOs. Despite its use, there is a collective agreement that mixed group discussion and training around examples or scenarios is the best way to drive consistency between and within councils, and therefore it is essential that this centralised support by SA Health remains in place.

NSW FOOD AUTHORITY EXPERIENCE WITH SCORES ON DOORS

SA Health's Food Safety Rating Scheme was created in line with New South Wales (NSW) Food Authority's Scores on Doors program. Scores on Doors has been operating in NSW since 2011 following a successful pilot in 2010. SA Health sought information from NSW Food Authority regarding their experiences with Scores on Doors and outcomes of their review of the pilot scheme. It was identified that NSW has not made any fundamental changes to their program since its roll out in 2011. From its inception in 2011 until 2015, the Scores on Doors program had an assigned person as a dedicated resource to promote the program and educate council EHOs. The Scores on Doors program is now running smoothly and has a consistent state-wide compliance rating.

While the scope of businesses covered by Scores on Doors was originally set by NSW Food Authority, some individual councils have expanded the program to include additional businesses, with one council capturing all food businesses in the program, regardless of their classification. Given this significant difference between the businesses captured by the SA Food Safety Rating Scheme and the NSW Scores on Doors program it is unreasonable to compare the star rating certificate data between the two schemes.

After eight years of operation the Scores on Doors program remains a voluntary system for both councils and businesses. Feedback from EHOs in NSW has been similar to feedback received during the FSRS review in that EHOs would like to see the system become mandatory. Consistent to data obtained during the FSRS review, information from NSW EHOs has shown that 3 star rating certificates have negative connotations as it is the lowest score that can be obtained (despite the 3 star rating aiming to reflect a 'good' score for the business).

NSW Food Authority is looking to establish an online inspection portal where they would have access to the inspection data from councils. This system will present an opportunity for timely inspection data analysis, identification of non-compliance and possible release of scores to the public.

CONSULTATION WITH REFERENCE GROUP MEMBERS

A FSRS reference group was formed in 2015 which included representatives from industry groups, local government and consumer groups. This group had a key role in the development of the Scheme. The Reference Group assisted by providing feedback to the work plan group in the development of key elements of the Scheme, encouraged engagement of councils and promoted awareness and understanding of the Scheme to businesses and consumers. Considering their role in development of the Scheme, the members of this group were invited to provide final comments and feedback on the Scheme and its review process.

All members of Reference Group unanimously support the continuation of the Scheme as they see the benefits of the Scheme in the improvement of food safety with in SA food businesses.

The council representatives agreed that the inspection form and the Scheme in general provide a basis for discussions with businesses about food safety risks during the routine inspection. The collection of non-compliance data from the forms has assisted some council's in providing targeted information to businesses about common food safety issues. The council representatives raised that inspection consistency across jurisdictions, particularly in relation to scoring of non-compliances, is of importance. Concerns about inspection consistency were also raised by industry representatives. To improve inspection consistency Reference Group members recommended a review and update of the EHO toolkit, regular training for EHOs and review of the FSRS inspection form.

It was stated that food businesses who engaged well were generally very passionate about achieving a 5 star rating and that 3 star ratings have perceived negative connotations. Comments from businesses to council officers indicated businesses would be unlikely to display a 3 star rating certificate.

It was perceived by the members that overall awareness of the Scheme by the public was low, henceforth leading to low consumer demand for star rating certificates in businesses. Suggestions to improve awareness of the Scheme included ongoing advertising particularly using social media, as it was noted that there was only one concentrated wave of advertising when the Scheme was launched in 2016.

Members discussed that having an “app” or web-based platform showing the location of businesses and their star ratings may also raise awareness of the Scheme, and in turn encourage businesses to participate and improve their food safety. Some councils’ including Brisbane City Council in Queensland and City of West Torrens in South Australia have already commenced providing star ratings in public electronic platforms i.e. via council websites. While Brisbane City Council is listing all businesses, their locations and star ratings on their website, the City of West Torrens is only listing the name and location of those businesses that have 5 star rating. It was noted that making the Scheme mandatory may be the best solution to encourage those businesses that have poor food safety culture to improve their food safety. Another incentive that some councils are already using to encourage food businesses to improve their star rating is providing discounts on inspection fees or reduced inspection frequency if business achieve high star rating consistently, however this is at the discretion of the councils.

CONCLUSION

Operating in 21 councils and covering 72% of the SA population, the current FRSR scheme has the potential to positively impact food safety in food service businesses.

The FSRS appears to be having a positive impact on driving compliance (Objective 1) as shown by a significant improvement in the areas of highest non-compliance when compared with the pilot. Despite the limited resources for consumer education and awareness, the

level of understanding of the Scheme is slowly improving (Objective 2). It should be remembered that surveys have captured the thoughts and impressions of food service customers already engaged with the Scheme. Increasing general public awareness of this Scheme has the power to improve and drive a food business to improve food safety. As the system continues, more inspection data and improved consistency in the inspection process is expected.

APPENDIX

1. Appendix 1: Australia's Foodborne Illness Reduction Strategy 2018 – 2021+

In April 2017, the Australia and New Zealand Ministerial Forum on Food Regulation (the Forum) agreed the food regulation system is producing strong food safety outcomes overall, however agreed to three priority areas for the food regulation system across Australia and New Zealand for 2017 – 2021 which would further strengthen the existing system.

- > To reduce foodborne illness, particularly related to *Campylobacter* and *Salmonella*, with a nationally-consistent approach.
- > To support the public health objectives to reduce chronic disease related to overweight and obesity.
- > To maintain a strong, robust and agile food regulation system that gives confidence to consumers that their food is safe, and that the system can manage new and innovative industry approaches.

By being proactive the food regulation system will not only better protect consumers, it will also support the food industry to meet consumer demands.

To support Priority 1, a national strategy Australia's Foodborne Illness Reduction Strategy 2018 – 2021+ was developed in collaboration with industry.

<http://www.health.gov.au/internet/fr/publishing.nsf/Content/australia-foodborne-illness-reduction-strategy-2018%E2%80%932021>

Appendix 2: Food Business Inspection Form

<https://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/resources/food+safety+rating+Scheme+pilot+inspection+form>

This inspection report reflects findings from the date and time of inspection only			
Business name		Date	Time
Address (including post code)		Inspection type	Risk Class Code
Postal address (if different)		Date of previous inspection: Are all actions from previous inspection actioned? y/n	
Contact No.		Food Court: y/n Chain / Franchise: y/n	
ABN/ACN		Does the business also operate mobile sites: y/n	
Proprietor / Manager		Person In Charge (at time of inspection):	
		Business Contact Email	

General Result		Premises and Equipment (incl. vehicles)	
1	Has the business notified 3.2.2-4	1	4
2	Food business general duty responsibilities demonstrated 3.2.2-16/18	1or 8	4
Received goods			
3	Are protected from contamination 3.2.2-5.1	4	4
4	Are traceable and accurately identified 3.2.2-5.2	1	4
5	PHF received under temp control 3.2.2-5.3/4	4	4
Transportation and Distribution			
6	All foods are protected from contamination 3.2.2-10 : 3.2.3-17	4	4
7	PHF transported under time/temp control 3.2.2-10	4	4
Recalls /Food disposal			
8	Food for disposal is clearly identified and segregated 3.2.2-11	1	4
9	Recall process in place 3.2.2-12	1	4
Storage			
10	Foods stored appropriately, and under appropriate environmental conditions and protected from contamination 3.2.2-6:3a b	1or 4	4
11	PHF stored under temp control 3.2.2-6:2	4or 8	4
Processing			
12	Practical measures in place to process safe and suitable food 3.2.2-7:1a	4	4
13	Foods protected from contamination 3.2.2-7:1bi	4	4

This inspection report reflects findings from the date and time of inspection only			
14	All foods processed adequately - in particular high risk foods 3.2.2-7:1bi	8	4
15	Minimised amount of time PHF are out of temp control 3.2.2-7:2	8	4
16	PHF are cooled correctly 3.2.2-7:3	8	4
17	PHF rapidly reheated to hold it hot 3.2.2-7:4	8	4
Displayed foods			
18	Are protected from contamination. RTE self service food supervised and separate utensils provided 3.2.2-8:1,2,3,4	4	4
19	PHF displayed under temp control or time limit not exceeded 3.2.2-8:5	8	4
Packaging			
20	Process and materials are appropriate 3.2.2-9	1	4
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 unrated			
Further action: (please circle) Nil Re-inspection Letter Notice Expiration			
Inspecting officer Signature: Contact no.:			
Owner / Manager / Employee Sign: Print:			
Details of individual inspections as part of the voluntary Food Safety Rating Scheme will only be used by SA Health for issuing certificates (where appropriate) and determining the public health outcomes of this Scheme and will not be released by SA Health for any other purpose unless required by law.			

Adequate Cleaning and Sanitising of:			
36	Eating and drinking utensils 3.2.2-20: 3.2.3-12	4	4
37	Food contact surfaces - including equipment (e.g. benches / boards) 3.2.2-20, 3.2.3-17	8	4
Food handlers MUST -			
38	NOT handle food in a way that could make the food unsafe or unsuitable 3.2.2-13	4	4
39	NOT handle food if suffering from/ carrying a foodborne illness/condition 3.2.2-14	8	4
40	Wear appropriate clean clothing/ bandages, and minimise personal contamination of food/food contact surfaces 3.2.2-15.1	4	4
41	NOT eat, sneeze, spit, cough, use tobacco or similar over food/food prep surfaces 3.2.2-15.1	8	4
42	Wash and dry hands as directed by 3.2.2-15.2,3	8	4
43	Wash hands using 'soap', warm running water and dry hands appropriately 3.2.2-15.4,17.1	8	4
44	Demonstrate appropriate food handling - skills and knowledge 3.2.2-3	1or 8	4

Appendix 3: FSRs Brochure for Businesses Star Rating Scheme

<https://www.sahealth.sa.gov.au/wps/wcm/connect/58fbfe004598437582978f2ed7c5921e/Food+Safety+Rating+2016+DL%28v2%29WebS.pdf?MOD=AJPERES&CACHEID=ROOTWORKSPACE-58fbfe004598437582978f2ed7c5921e-mwMPUdv>

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.

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 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?

You will 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 Scheme?

If your council has volunteered to participate in the Scheme, 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 or council will provide you with your certificate to display onsite.

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.

Food Safety Rating Scheme

What does this mean for my business?



Information for Businesses

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 food safety 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
health.FSRs@sa.gov.au

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What is the Food Safety Rating Scheme?

The Food Safety Rating Scheme (the Scheme) is used to inform consumers of how well a food business complies with food safety standards. It provides a score, interpreted from routine council food premises inspections, to be displayed at food service businesses, such as restaurants, cafes, take-away shops, pubs and bakeries.

A 12 month pilot of the Scheme, undertaken in 14/15 has successfully demonstrated that this Scheme provides an opportunity to increase state wide food safety standards and provides a tangible benefit to SA consumers, and should therefore be rolled out to all council areas.

Council participation in the Scheme is voluntary. Your local Council has chosen to participate.

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

Ultimately there will be little difference to your routine inspection.

Routine Council food premises inspections will continue to assess 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 of the Scheme.

What are the differences now your council is participating?

There are three key differences:

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. If you achieve a 3, 4 or 5 Star rating SA Health will dispatch a certificate for you to display at your business if you wish. **You are not obliged to display the certificate.** You will not receive a certificate if your score is too high or you have a major issue.

How is my business rated?

The inspection form lists all the elements that you need to comply with, 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. a problem associated with food handling and preparation carries more risk than minor structural issues and therefore will be given a higher score.

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 one of the major areas will be considered to present a higher food safety risk and as a consequence corrective actions must be undertaken and the business will not be issued 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 Food Act to achieve compliance as directed by the council EHO regardless of your final score.

Appendix 4: Star Rating Certificate Template

South Australian

Food Safety Rating



achieved a
VERY GOOD food safety rating

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

This certificate and its image 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.



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Appendix 5: Feedback Data Collection Methodology

For the review of the Scheme, feedback data was collected from consumers, food businesses and councils for analysis. The inspection data was also analysed to gauge the performance of the Scheme. The following methods were used to capture the data for analysis:

- > Consumer data – Online survey on SA Health website and on YourSAy platform
- > Food business data – Online survey on YourSAy platform
- > Participating council – Face to face meetings using a standardised questionnaire
- > Non-participating council – Face to face meeting, teleconference and standardised questionnaire response
- > Food inspection data – Provided by participating councils

For more information

www.sahealth.sa.gov.au

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