

SCORES ON THE DOORS

Executive Summary

1. This paper sets out the key findings of the Agency's evaluation on scores on the doors schemes operated by UK local authorities. It concludes that there is general stakeholder support for such schemes as a good way to help inform and empower consumers. Experience with current schemes also suggests that they can encourage businesses to raise hygiene standards.
2. The findings show strong support for a national scheme to avoid continued proliferation of different local authority arrangements. It concludes that a scheme based on the following principles would provide an approach that would go furthest to meeting stakeholder views and expectations:
 - a 4 tier system (3 tiers + "fail");
 - a star system rating (with accompanying descriptor);
 - effective local authority appeals procedures;
 - arrangements to allow opportunities for rescoring; and
 - voluntary display of scores on business premises

Board Action Required

3. The Board is asked to:
 - **note** the background to Scores on the Doors pilots and conclusions from the evaluation exercise;
 - **agree** a proposed national approach to Scores on the Doors to be the basis of formal stakeholder consultation; and
 - **note** work planned to engage with stakeholders in developing a support package for the national approach.

LOCAL AUTHORITY LIAISON DIVISION

Contacts: Tom Murray Tel: 0207 276 8980
tom.murray@foodstandards.gsi.gov.uk
Paula Waldron Tel: 0207 276 8444
paula.waldron@foodstandards.gsi.gov.uk

SCORES ON THE DOORS

Issue

1. To formally agree a recommendation for a national scores on the doors approach, and to note the strategy for future stakeholder engagement.

Strategic Aims

2. The measures considered within this paper deliver the strategic target of recommending a national scheme for publishing information on food hygiene in food businesses.

Background

3. "Scores on the doors" for this purpose is defined as a scheme where food hygiene information is made available at the business premises, supported by web-based information systems. The primary purpose of scores on the doors is to inform and empower consumers. Experience with current schemes does suggest that this in turn can encourage businesses to raise their hygiene standards.
4. A number of local authorities have developed their own schemes independently of the Agency to respond to local needs. The Agency and LACORS agreed Key Principles for schemes, which was published on the Agency website, to assist local authorities.
5. In total, over one hundred local authorities are currently publishing information on the web. Most of these use a 5-star rating scheme, and there are also a significant number of other schemes (such as smiley faces or traffic lights). Some schemes focus on specific sectors of the food industry, usually catering outlets, others cover all businesses subject to a food hygiene inspection.
6. In September 2006 the Board was updated on progress on scores on doors schemes operating in the UK, and how the Agency was evaluating them [PRO 06/09/01]. Approximately fifty local authorities are Agency-supported pilots. The pilots were established to enable the Agency to gather evidence to evaluate the following key issues:
 - The effectiveness of schemes and the different tier systems used;
 - The different approaches to using symbols to categorise scores;
 - The need for appeals / re-inspection (re-scoring) mechanisms; and
 - Whether schemes can work on a voluntary basis with regard to the display of scores.

7. The number of schemes in place has enabled the Agency to track different schemes and test the key issues above in the context of any recommendations for a national scheme. Many local authority schemes have been driven by local needs, including the efficiencies they offer in handling of Freedom of Information (FOI) requests on business hygiene standards. Were the Agency to decide not to pursue a national approach at this stage the number of local authorities participating in scores on the doors schemes could continue to rise for the foreseeable future to reflect the FOI advantages and local demands.
8. Scores on the doors schemes are also already operating in parts of North America, Singapore and parts of Europe and these too provide useful information. Some examples of overseas schemes are set out in Annex A.
9. An Independent Advisory Group (IAG) was established in 2007 to bring together relevant stakeholders to consider the key issues associated with scores on the doors and any national scheme. A workshop was also held on 5 February 2008 where key evaluation findings were presented and some Board Members were able to hear first-hand the views of industry, consumer, and local authority stakeholders. The work of the IAG and views expressed at the workshop have helped inform the conclusions and recommendations in this paper.

Evaluation Exercise

10. Two companies were contracted to formally evaluate scores on the doors schemes in the UK. Continental Research have evaluated consumer understanding of the schemes, and Greenstreet Berman have assessed the impact on local authorities and businesses and recommended a way forward on each of the evaluation objectives in light of the evidence available¹.
11. **The effectiveness of schemes and the different tier systems used** - The evaluation reviewed the existing schemes which ranged from two tier (e.g. pass, improvement required) to six tier (e.g. 0 – 5 stars). Examples of four tier schemes included “smiley faces” and 0 – 3 stars. Most schemes use the three elements of the enforcement Code of Practice² risk rating system within a business proprietor’s direct control as the basis for their scores on the doors rating i.e. the standard of hygiene, structure, and management control. The evaluation considered the way these different approaches influenced both consumers and businesses, and their practicality from a local authority scoring perspective.
12. **The different approaches to using symbols to categorise scores** - A wide range of symbols are used in existing schemes, although the majority use star

¹ The executive summary of the Greenstreet Berman evaluation can be found in Annex B.

² The Code of Practice made under the Food Safety Act 1990 sets out guidance on enforcement approach to which the local and port health authorities (food authorities) should have regard to. It contains a risk rating scoring system which is used by food authorities to determine inspection frequencies.

symbols. Examples of other local authority approaches include traffic lights, smiley faces, tulips, words (such as “good” and “poor”) and letters (“A – E”). Sometimes a scheme might combine these (e.g. “good” with a green tick and “poor” with a red cross). The evaluation considered which symbol was likely to be best for consumer understanding and business \ local authority acceptability.

13. **The need for appeals / re-inspection (re-scoring) mechanisms** - Currently, at least three schemes offer the opportunity for rescoring (Scotland, Torridge and Leicester) and one scheme, Leicester, charges for re-inspection associated with this. Re-inspections normally take place after a business has achieved a low score at the initial assessment, and after remedial action has been taken by the business. All schemes offer appeals through existing local authority channels. The evaluation considered whether formal re-inspection (requested by a business to amend a score) and a more formal appeal procedure were necessary.
14. **Whether schemes can work on a voluntary basis with regard to the display of scores** - Although local authorities are able to put business scores on their websites, there is no current legal requirement requiring businesses to display certificates or stickers at their business premises. The evaluation considered whether schemes could be effective on a voluntary basis.

Key Evaluation Findings

15. Overall the evaluation shows that there is consumer, business and local authority support for scores on doors as a way better inform and empower consumers. All stakeholders see a need for a national scores on doors scheme to avoid the continued proliferation of different local arrangements, and to maximise impact and to minimise confusion.
16. There is evidence that schemes encouraged businesses to improve hygiene standards and may have led to measurable improvements in hygiene inspection scores. The evaluation could not attribute the improvements seen to scores on the doors schemes alone because of other potential contributing factors (for example, Safer Food Better Business).
17. Key findings from the evaluation to inform any national scores on doors scheme are provided below.

Numbers of Tiers

18. The evaluation focus groups showed a consumer preference for schemes having a rating scale that differentiates different compliance levels. The consumer Hall Tests³ demonstrated that consumers’ understanding of what the tiers meant in

³ The Hall Tests formed part of Continental Research’s evaluation of the impact of schemes to consumers. They took place in areas not running scores on the doors schemes, and asked participants to assess and rate the key details of a scheme.

terms of standards and their corresponding symbols was stronger in schemes such as the four-tier systems of Coventry and Leicester.

19. Businesses expressed support for a progressive scale with more than 2 or 3 tiers in order to more validly reflect their standards and to provide an incentive to improve. Schemes with fewer tiers, such as the “pass” and “improvement required” scheme used in Scotland, were perceived to be easy to understand by consumers, but provided them with limited information to draw distinctions between the standards of different premises.
20. Some local authorities operating 0 to 5 star schemes did not issue certificates for grades less than 3 on the assumption they would not be displayed. The feedback from business supported this, with businesses reluctant to display a grade below the middle point of the scale, even where this was defined in the scheme as broadly compliant. The consumer evaluation also showed a significant reduction in consumer confidence for any premises less than half way up a rating scale, with businesses in the bottom half of any rating scale seen as poor performers. The evaluation indicated that a greater number of tiers did not lead to increased consumer or business differentiation between standards. The findings of the evaluation suggest a 0 - 3 tier system.
21. The Davidson Review on the implementation of EU legislation also commented that any scores on the doors schemes should avoid the possibility of regulatory creep arising from a need to achieve standards higher than legal requirements to achieve the higher ratings.⁴
22. The consumer research and the feedback from business and local authorities indicated the importance of clearly communicating the scale and the meaning of each tier, suggesting the full scale to be displayed and descriptive words set against each tier.

Format of information

23. Consumer research indicates a strong preferences for certain types of symbols and words. Consumers prefer positive symbols (such as stars) and words. They show a preference for more detailed information to help inform choice (such as an explanation of the scoring system and the history of the premises). They also prefer certificates that look authoritative, and would like to see local authority and FSA logos, which convey a sense of authority.
24. Stakeholders in the hospitality industry have expressed concern that using star ratings for hygiene information may confuse consumers, as there is an existing system in use for hotel services. Any star scheme would need styling to avoid such confusion.

⁴ Davidson Review on Implementation of EU Legislation
http://bre.berr.gov.uk/regulation/documents/davidson_review/davidson_review.pdf

Re-inspection (Re-scoring)

25. Some local authorities considered that re-inspection and subsequent rescoring will encourage businesses to make short-term improvements which they then fail to sustain. However, industry argues that opportunities for rescoring following improvements are vital to give consumers accurate information on standards and will incentivise businesses to improve. One scheme displays the business's two previous scores, so that consumers can judge if the business has sustained improvement or whether standards are slipping between inspections.
26. The evaluation evidence shows that businesses regard an opportunity for a "rescore" as an important factor in any scores on the doors scheme. The evidence from the evaluation also indicates that businesses may accept charges to change their scores, but would be reluctant to pay unless it was associated with a desire for a better grade.
27. On balance, the Agency considers opportunities for rescoring to be essential. In resource terms, any premises which receives a low score is likely to be revisited as part of a local authority's routine enforcement activities to check that any necessary improvements have been made. The cost to local authorities of reinspection for these businesses should therefore be neutral. Where a business requires a revisit to move from a medium to high rankings, this could require additional local authority resources. The costs of providing these services, the ability to charge for re-inspections and the mechanisms by which charges may be instituted will be explored as part of the consultation process.
28. The Agency will look further at ways to minimise local authority burdens from rescoring premises, including experience of the level of demand for revisits and how in certain circumstances some authorities are using evidence that improvements have been made rather than actually visiting the business (for example, photographs backed up by invoices).

Appeals

29. All schemes currently offer businesses an opportunity to appeal against scoring decisions, usually through the local authority's complaints procedure. However, in practice few appeals appear to have been made. Some schemes also offer a 'right of reply' on their website.

Display of Scores at premises

30. As displays of scores \ ratings at business premises is currently voluntary, the evaluation indicates that premises currently achieving the higher ratings are more likely to display their certificate than those with low ratings.

31. However, scheme coverage of businesses and consumer awareness of schemes is currently low, so businesses not displaying scores do not stand out to consumers. As a national scheme extends coverage and provides the opportunity to raise consumer awareness it may be increasingly difficult for a business not to display its score without consumers drawing their own conclusions about standards.
32. There is some support amongst local authorities and consumer groups for making the display of certificates by business mandatory. The 10th London Local Authorities Bill, currently before Parliament, contains a draft clause to this effect that only applies to London boroughs. The Agency supports measures to improve consumer choice, but at present does not have the evidence to support a mandatory approach requiring the display of certificates. Advocating a mandatory approach at this stage would not, we believe, be in line with the principles of good regulation⁵.

Conclusions

33. Evaluation evidence does not conclude in favour of any one existing approach. However, the conclusion which follows would provide an evidence based national scheme and would address most of the views and concerns of stakeholders:
- A four tier system (with a clearly defined scale) which will provide more information to consumers than a pass / fail scheme and incentivise businesses, but at the same time reduce the potential for consumer confusion and the potential for inconsistency arising from more tiers;
 - A star rating system (as positive rating systems are favoured by consumers), but styled to avoid confusion with existing hotel schemes;
 - Revisits and rescore, with the detail of how this will work to be the subject of further work;
 - Existing local authority arrangements for appeals / complaints;
 - Display of scores at food businesses to be voluntary

⁵ Proportionate, accountable, consistent, transparent and targeted.

Other Issues Relevant To A National Scores On Doors Scheme

Devolved Administrations

34. Belfast and Banbridge in Northern Ireland and Swansea in Wales are piloting the 5-star scheme developed by the London local authorities. A number of authorities in Northern Ireland and Wales, whilst not currently piloting schemes, are generally positive and have taken the decision not to progress matters until there is an agreed national approach.
35. The Agency in Scotland has been working with stakeholders for two and a half years on the development of a hygiene information scheme for consumers. The Food Hygiene Information Scheme pilot was launched in November 2006 with broad consensus from consumer, industry and enforcement representatives that make up the project Steering Group. The scheme is based on a pass/fail format with the 'Pass' level set at a standard that is intended to reflect compliance with food hygiene regulations. The Steering Group has produced a "One year on" report which incorporated the findings of an interim evaluation reported in May 2007⁶. The Scottish Food Advisory Committee considered the Steering Group's report (in draft) at its open meeting on February 2008 and agreed its recommendations.
36. The proposed national scheme is a significant departure from the scheme developed in Scotland and the proposal is to consult in Scotland on the scheme set out in this paper and also on the Food Hygiene Information Scheme. However, prior to consultation, it is proposed that the Agency in Scotland will review the recent Greenstreet Berman and Continental research with the stakeholder Steering Group and consider whether any aspects of the scheme should be amended prior to consultation.
37. Whilst the proposed national scheme is a departure from the system developed in Scotland, the level of compliance required to achieve a "pass" rating is broadly comparable to the two- and three- star categories proposed in this paper.

Hygiene Awards

38. Hygiene Awards are distinct from scores on the doors as they recognise only those businesses that have achieved very high standards of hygiene. An example of a Hygiene Award is the Agency's EatSafe award used in Northern Ireland and Scotland, and "gold, silver and bronze" awards used in Wales. Currently, there is no national Hygiene Award scheme operating in England.

⁶ <http://www.food.gov.uk/scotland/safetyhygienescot/foodhygieneinfoscot/>

39. Agency research indicates that Hygiene Awards have the potential to motivate business. However, they are used primarily to motivate staff within the business rather than to inform consumers more generally about hygiene standards of the food businesses in their area. On this basis, and to avoid the risk of “gold plating”, i.e. the scheme requiring more than the current legal requirements, it is proposed that Hygiene Awards where they exist should be outside and in addition to the scores on the doors scheme.

Legal Implications

40. The primary purpose of any national scores on doors scheme is to inform and empower consumers. Supporting such a scheme is viewed as compatible with the Agency’s powers and functions.

Risk, resource and sustainability implications

41. A key risk is that Local Authorities may choose to remain with local schemes. This would lead to a lack of consistency across the UK. The Agency will mitigate this risk through promoting the national scheme and providing local authorities with support that will encourage a switch to a national approach. A report will be put to the Board in 2010 detailing the take-up of the national approach.
42. The evaluation indicates that consumer awareness of scores on the doors, whilst a key factor in the success of a scheme, is currently low. Stakeholders have indicated that they would expect a commitment from the Agency to raise the general awareness of any national scheme.
43. There are risks that inspection numbers could increase in connection with revisits, but routine inspections programmes by local authorities would allow authorities to set the initial scores, and the revisits necessary to assess improvements in poorly performing business are part of their routine hygiene inspection activity. As such schemes could be incorporated into their current inspection arrangements. Local authorities would not be required to provide additional inspections as a result of any national scores on the doors scheme unless the scheme allowed for a business to request a rescoring opportunity to move from a satisfactory score.
44. There is a risk from inconsistent scoring which may affect scheme credibility. However, Environmental Health Practitioners are experienced in scoring premises against the Code of Practice, which forms the basis of all current schemes. This should help mitigate this risk. The Agency support for pilot schemes included training to achieve consistency, and this could be considered for inclusion in any national support package.
45. Consideration has been given to the sustainability of the proposals. Environmental impacts will be minimal, although there will be a positive social

impact from improving consumer choice and a potential benefit in terms of business reputation for those businesses fully compliant with hygiene standards.

Recommendation

46. Based on the evaluation and conclusions presented in this paper, it is recommended that a national scores on the doors scheme is based on:

- a 4 tier system (3 tiers + “fail”)
- a star system rating (with accompanying descriptor)
- effective local authority appeals procedures
- arrangements to allow opportunities for rescoring
- voluntary display of scores on business premises

47. A matrix showing how the scheme relates to the Code of Practice risk rating system and symbols and suggested descriptors is provided at Annex C.

Next Steps: Timetable

48. Subject to Board discussions it is proposed to carry out a twelve week consultation on a national scores on doors scheme based on the key conclusions in this paper. During the consultation period, officials will work with relevant stakeholders to develop a support package for the scheme.

49. A further paper will be put to the Board in Autumn 2008 detailing the results of the consultation, when the Board will be asked to confirm the final scheme and any Agency support package necessary to promote and sustain the scheme.

50. The national scores on the doors scheme will be subject to review after a two year implementation period to assess its impact and take-up, and any changes necessary in light of experience.

Board Action Required

51. The Board is asked to:

- **note** the background to Scores on the Doors pilots and conclusions from the evaluation exercise;
- **agree** a proposed national approach to Scores on the Doors, to be the basis of formal stakeholder consultation; and
- **note** work planned to engage with stakeholders in developing a support package for the national approach

EXAMPLES OF INTERNATIONAL APPROACHES

There are a number of scores on the doors schemes around the world. The examples below include a selection from the USA, where most states have a scheme, and others from Canada, Denmark and Singapore. Information on evaluation of the schemes has been included where possible.

DENMARK

After each inspection, the supervising officer reports on the outcome and a new “smiley” is awarded. The accompanying report is made publicly available on the national smiley website, which also displays the four most recent inspection reports for each establishment. Businesses must display to customers the most recent smiley report.

Scores are in the form of a series of faces:-

Very happy smiley face - The Inspector had no remarks;

Happy smiley face – Certain rules must be obeyed;

Neutral face - An injunction or prohibitory order has been given to the enterprise;

Frowning face - The enterprise has received an administrative fine, been reported to the police or approval has been withdrawn.

If the result of an inspection is unsatisfactory the premises can be re-inspected after it has improved but this must be paid for. The results are also published on the Ministry of Family and Consumer Affairs website at:

<http://smiley.fvst.dk/Smiley.aspx?view=Simpel>

Evaluation of the Denmark Scheme

Surveys carried out in 2003 showed that 94% of consumers supported the scheme and 79% said they would be influenced by the results when choosing eating places. 77% of businesses supported the scheme and of these 83% believed that the inspector’s judgement was fair when making assessments. Overall, the Danish food authority asserts that compliance levels have improved and that the scheme has been an outstanding success.⁷

⁷ Jenny Morris. Publication of Hygiene Inspection Information. Report available via the internet at: http://www.cieh.org/knowledge/food_safety_and_nutrition/food_safety_and_standards/food_safety_initiatives.htm

USA: NEW YORK

The Food Service Establishment Inspection Scoring System is designed to provide food service operators with a clear understanding of where a problem exists and what they must do to prevent illness or disease. A base point value is assigned to each violation. A Public Health Hazard is the most severe type of violation and typically has a base point value of 7; other Critical Violations have a value of 5; and General Violations have a value of 2. A total of 28 or more points in public health hazards, critical or general violations requires a follow-up inspection by the Department of Health and Mental Hygiene (DOHMH) to determine if the violations have been corrected. Depending on the severity of the violation, additional violation points may be added, so that the final point total reflects the extent and severity of the violation. The more extensive or severe the violation, the greater the overall point value it has. Details are posted on the New York City DOHMH website:

<http://www.nyc.gov/html/doh/html/rii/index.shtml>

USA: TENNESSEE

Tennessee uses a 44-item inspection sheet with a maximum of 100 points. Thirteen of the items are considered critical. Non-compliance with critical items must be corrected within ten days. Serious or repeated violations may result in revocation of the establishment's permit. Current food permits and the most recent inspection report must be displayed in a prominent location for the public to view. Reports are also placed on the Department of Health's website at:

<http://tn.state.gogov.com/tennessee/>

USA: VESSEL SANITATION PROGRAM (VSP)

VSP was launched by the US Department of Health and Human Services, Centres for Disease Control and Prevention in the early Seventies after several disease outbreaks on cruise ships. It was established to protect both passengers and crew by minimising the risk of gastrointestinal illnesses on cruise ships.

VSP staff inspects twice yearly all cruise ships with a foreign itinerary that calls at a US port and carries 13 or more passengers. The inspections are conducted to ensure that vessels are maintained to adequate levels of sanitation and to provide guidance to staff if required. Inspections are scored on a points system of 100, with scores of 86, and higher, classified as satisfactory and below being deemed unsatisfactory and requiring reinspection within 30-45 days.

Scores are published on the VSP web site and a compiled list is also distributed to more than 3,000 travel-related services world-wide. These are available on the Centres for Disease Control and Prevention (CDC) website at:

<http://wwwn.cdc.gov/vsp/InspectionQueryTool/Forms/InspectionSearch.aspx>

Evaluation of the VSP Scheme

Since the program started the number of disease outbreaks on ships has declined dramatically even against a background of increased ships and passengers.⁸

CANADA: TORONTO

DINESAFE was introduced in 2001 when businesses had to post certificates detailing the results of food safety inspections in an obvious place. There are three categories:- Pass, conditional Pass (revisited in 48 hours) and Closed. These are also placed on the Dinesafe website at:
<http://app.toronto.ca/food2/index.jsp>

Evaluation of the Toronto Scheme

There was an increase in compliance with regulatory requirements from 78% in 2001 to 88% by 2003. There was also a reduction in infractions known to be associated with food borne illness and a greater compliance in food premises with certified food handlers compared with those without.⁹

SINGAPORE

A Grading system for Eating Establishments and Foodstalls was introduced in June 1997. Its aims were to provide a more structured appraisal system and to encourage licensees to improve and maintain good personal and food hygiene at their stalls. It is claimed that this system enables the public to make a more informed choice when patronising these stalls.

Establishments are graded using an A – D system where A is excellent and scored at 85% and above, B is Good (70% - 84%), C is Average (50% - 69%) and below 50% is Poor, and a certificate is issued to the vendor.

⁸ Quoted on the CDC website at: <http://www.cdc.gov/nceh/vsp/desc/aboutvsp.htm>

⁹ Sylvanus Thompson, Ron de Burger and Olayemi Kadri. The Toronto food inspection and disclosure system. *British Food Journal*, 107 (3), 2005



Evaluation of Scores On The Doors
Executive Summary for the Food Standards Agency
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Michael S Wright, Rachel Evans, Rachel Smith, Nina Williams,
Paul Leach and Ben Cash.

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Greenstreet Berman Ltd

10 Fitzroy Square, London, W1T 5HP T: 020-7874-1570

E: info@greenstreet.co.uk www.greenstreet.co.uk

This document provides a summary of Greenstreet Berman Ltd's evaluation of scores on the doors schemes completed on behalf of the Food Standards Agency in 2007-2008.

Executive summary

Scores on the doors' (SOTD) schemes are intended to assess food businesses against legal compliance. This is commonly an assessment against three parts of the Inspection Rating Scheme, namely, hygiene compliance, confidence in management/control systems and structural hygiene. A certificate given to the business after a routine hygiene inspection and displayed on the window, door or a public access area of the premise. The ultimate aim of the evaluation was to inform FSA decisions on a national SOTD scheme. This evaluation provided information from the period to end of 2007 of current schemes regarding:

- Impact on Local Authorities and businesses;
- Rates of display amongst businesses;
- Level of awareness and comprehension amongst consumers and businesses;
- Whether consumers will take account of the award (or lack of one) in their consumption behaviour;
- Whether it prompts improved food hygiene standards amongst food businesses.

The evaluation included:

- A postal survey of businesses that had received a SOTD certificate or letter;
- A telephone survey of SOTD businesses to acquire more open ended feedback;
- A series of workshops with Local Authorities (LAs) operating SOTD to acquire their subjective feedback on the aims, design, impact and experience of schemes;
- Online questionnaires for Local Authorities operating SOTD to indicate their aims, the design of the schemes, their impact on the authority and their opinion of the scheme;
- An assessment of hygiene inspection data provided by local authorities from before and after certification, along with the inspectors judgement of change in standards and observation of certificate display;
- A consumer study by Continental Research to (1) quantitatively gauge the level of consumer awareness and usage of schemes and (2) and quantitative and qualitative reactions to pilot certificates/ schemes.

Key findings

Costs and benefits

Overall, the costs (which are borne mainly by LAs) were considered acceptable by LAs, whilst benefits accrued to businesses, LAs and customers. Whilst most LAs identified significant costs (time and expenses) in launching and, less so, in operating SOTD schemes, these did not hinder other food safety enforcement work and the resources required to operate schemes were less than expected, in most

cases. Key demand on LAs included designing and launching a scheme, and producing websites. These costs would be reduced if a national scheme was introduced.

The immediate cost to businesses was minimal, in the form of posting a certificate. Hygiene improvements were aimed at achieving higher scores, and hence were required to improve compliance and so were not exclusively required by SOTD schemes.

There was evidence that SOTD schemes encouraged businesses to improve hygiene standards and may have led to measurable improvements in hygiene inspection scores. The evidence included:

- The subjective opinions of businesses (who quoted examples of improvements attributed to SOTD) and inspectors;
- Statistically significant improvements in hygiene inspection scores in SOTD businesses between the period before and after implementation of SOTD, although we cannot certainly attribute these improvements to SOTD;
- Evaluations of similar schemes overseas have shown a direct link between SOTD and improved standards in business.

Businesses provided a series of positive reasons for displaying certificates, including increasing customer confidence and their reputation.

There was less evidence of an impact on UK consumers. Both businesses and consumers reported low levels of consumer awareness of current schemes, with little impact on the number of customers. Also the rate of display of certificates reported by inspectors was low. The researchers' opinion is that the relatively low level of awareness reflected the short duration of schemes and the limits of LA publicity. LAs and some businesses advocated a larger scale national advertising campaign to raise awareness. Some LAs advocated compulsory display of certificates. Consumers did indicate that they would in the future make use of certificates in choosing food venues, in the event that a certificate was on display.

LAs also reported benefits to them, over and above better hygiene standards. These included a more positive attitude to compliance amongst businesses, improved profile of food safety activities and a reduction in high risk category businesses (which reduces inspection workload).

Grading broadly compliant

All sources queried how 'broadly compliant' is presented. The researchers suggest that 'broadly compliant' businesses should be 'happy' to display a certificate. The evaluation found that:

- Many LAs assume businesses will not display below 3 stars (in 0 to 5 star schemes);
- The business postal survey indicates that there is a sharp drop in the rate of display below 3 stars (again for 0 to 5 star schemes);

- Of schemes tested, consumers tended to express reluctance to use outlets with a rating below the midpoint (in the case of an odd point scheme), or in the bottom half of the scale (in the case of an even point scheme).
- There was some evidence that businesses, on the whole, displayed certificates with words such as Acceptable, as well as Pass;
- Businesses want a range of grades to provide recognition of their performance and an incentive to improve, citing a need for more than 2 or 3 grades.

These findings suggested a 0 to 3 grade system as this may avoid consumers wrongly assuming that middle or lower grades (i.e. tier 2 on a six point scale) are unacceptable whilst still providing a progressive scale with more than 2 grades. These points also suggested that the grading and certificate design needs to facilitate display and comprehension of broadly compliant scores. An option is to always display the scale and to use words to unambiguously communicate grades, such as Acceptable, whether or not symbols are used. In respect of lower grades, an option is to use 'positive' words, as far as possible, to describe lower grades to facilitate their display and to convey their meaning to consumers.

Certificate design

The feedback from the consumer research completed by Continental Research indicated:

- The Coventry / Hybrid 3-star scheme achieved the highest rating (easiest to understand, having a clear rating scale and other positive features)
- The perceived top score for the London sticker was 4 stars by 39% of people, with bottom score perceived to be 1 by 43% of people (the London sticker does not provide blank stars or the entire scale);
- Pass – Improvement Required had a low rating on clarity of the grading scale;
- The Smilesafe symbols rated lowest.

The consumer research also indicated that the certificate or sticker needs to be easy to understand, clearly noticeable, provides sufficient detail and up to date information.

Communicating with and supporting business

Whilst a minority of LAs do not offer advice and explanation of the scheme during inspections, the majority do. This was considered important to engage business and help them make improvements.

There was a clear policy divide between LAs, with some providing support to business (with SOTD as part of a wider initiative), and others viewing SOTD as a way of publicising scores (and arguing against workload of supporting business). Nonetheless most LAs promoted SFBB in parallel to SOTD. Therefore, there appeared to be little reason to not offer SFBB support alongside SOTD schemes, especially as some LAs found that SOTD prompted interest in SFBB.

Revisits

Whilst some LAs express concern about the workload and principle of revisits this evaluation indicated that:

- Businesses regard the option of a revisit as essential– although they are reluctant to pay for them unless they desire a better grade;
- To date LAs have reported few requests for revisits;
- Some LAs regard revisits as essential to secure business engagement with the scheme and to provide support to business hygiene improvements.

Therefore, it was concluded that the workload concerns may not be realised, whilst offering revisits meets a key business requirement.

Websites

Given that the majority of businesses do not display certificates, especially low grades, it appeared essential to have scores available online for the sake of consumer access and Freedom of Information, despite limited reported use by consumers in the consumer research.

Recommendations

A national SOTD scheme could be recommended on the grounds that:

- 97% of consumers support the idea, as do the majority of businesses and most LAs operating SOTD express satisfaction with them;
- A national scheme may have the presence to increase awareness and hence impact, and a national scheme, with national advertising, would reduce reliance on LAs resources;
- There was some evidence that SOTD could encourage improved food hygiene and facilitate self compliance amongst business due to the incentive offered by certificates as well as provide a basis for businesses to be positively engaged with LAs.

The evidence available to this evaluation provides a basis to offer some recommendations on features of a scheme, including:

- **Name of the scheme**– the scheme and title on the certificate should express the purpose of the scheme, such as food hygiene inspection score, rather than a colloquial phrase;
- **Content of certificates** - Certificates should boldly state that the certificate relates to food hygiene, include previous rating, provide the rating scale, a summary line to highlight any issues, date (and result) of previous and next inspection, the contact details for the LA and inspector, FSA logo and signatures, Certificate reference number;
- **Grading system** – a progressive 0 to 3 star scheme with words to define the grades. Some options on the definition of these grades are given below:

- As business did not display 'fail' grades, there appeared to be little value in having multiple 'fail' grades or in awarding a star for a 'fail' grade. One option was to define 1 star 'positively' such as Acceptable (with conditions) where the standard achieved does not need enforcement but improvement is needed to be broadly compliant. This follows the example of some US systems that use terms such as 'Conditional Pass' for businesses that are 'close' to compliance. 0 stars could be used for businesses where standards are clearly unacceptable, such as where enforcement action is needed. This could be defined as (for example) 'Unacceptable' or 'Unacceptable enforcement recommended';
- Businesses express a wish for a progressive scale to recognise their achievement and to provide an incentive for further progress. An option is to define grades 1 to 3 positively, such as 1 = Acceptable (with conditions), 2 = Satisfactory and 3 = Good (or Acceptable, Good and Very Good).

This evaluation does not provide a firm basis for determining the specific words used to define grades but does indicate the principles, as noted above.

Some concern was expressed about having multiple grades above broadly compliant (defined as 30 points). The concern was that this could create overly tight bands of scores that may be difficult to define, communicate and defend. For example, if broad compliance is 30 points, the bands above this would be (say) 0 to 10 and 15 to 25. If broad compliance is 25 to 30, then two superior grades would be even tighter.

Drawing these points together suggests that grade 2 is used for 'broadly compliant', grade 3 is for 'above broadly compliant', grade 1 is used for 'conditionally' acceptable and 0 is for businesses where enforcement is recommended.

- **Revisits** – these could be recommended on the grounds that businesses view them as very important, whilst few actually ask for a revisit. Payment in the region of £25 to £100 (say £50) could be required where the revisit is for a broadly compliant or above broadly compliant business that would not normally have a revisit for enforcement reasons. Revisits for businesses below broad compliance are likely to be made for routine enforcement and follow up reasons and so may not justify a charge;
- Inclusion of **complaints** within a general LA complaints process but a dedicated **appeals process**;
- **Advice to businesses**- Provision of advice and encouragement to businesses during inspections is recommended to ensure fairness and engender positive business engagement with the scheme, with additional support for businesses an option for LAs;
- **Publicity and stakeholder engagement**: a substantive publicity and engagement exercise is needed prior to launch of schemes, to alert and advice businesses and consumers;
- A dedicated **website(s)** with search functions by type of business, area, grade and name of business. It is uncertain whether a national or regional website is preferable.

Many respondents advocate a compulsory system. The low rate of display found to date could be interpreted to mean that compulsion is necessary. However, it is uncertain whether a national scheme with a high level of publicity would achieve a higher level of awareness of schemes and display of certificates. Therefore, an option is to launch a national scheme and monitor implementation, reviewing the question of compulsion at a later date.

Impact of introducing a new scheme

The evaluation indicates that:

- Business and consumers have a low awareness of current schemes;
- The majority of Local Authorities have not yet adopted a scheme;
- Some LAs have previously changed from one scheme to another.

Therefore, there is some evidence that a transition to a different scheme, whilst rendering the work completed by a significant minority of Local Authorities redundant, would not cause public communications problems or transition problems for most LAs.

DRAFT RATING SCALE AND COMPLIANCE DESCRIPTORS

Conversion Matrix for "Scores on the Doors"

Intervention Rating score on structure, hygiene and confidence in management	Compliance Descriptor	Star Rating	Notes	% of business*
0	GOOD	★★★	Establishments that have achieved a "high standard of compliance" (the business must still retain a maximum score of 5 in each CoP risk category)	28%
5				
10				
15				
20	SATISFACTORY	★★☆	Establishments that have achieved broad compliance (maximum score of 30 across the three risk rating elements, with no score higher than 10)	54%
25				
30				
35				
40	BASIC (improvement required)	★☆☆	Establishments with a risk rating score of greater than 10 in a compliance category.	13%
45				
50				
55				
60	FAIL	NO STARS	Businesses that have failed to meet the minimum hygiene standard and formal enforcement action is being pursued.	5%
65				
70				
75				
80				

* percentage of food businesses falling into each category based on 2005 Food Premises Survey.