FSA 07/12/04 **13 DECEMBER 2007**

SAFER FOOD, BETTER BUSINESS PROGRAMME – MILESTONE EVALUATION REPORT

Executive Summary

1. This paper describes progress of the Safer food, better business programme, the Agency's drive to better protect consumers by improving food safety in small catering and retail businesses. It reports an evaluation and review of the programme and presents conclusions and options for the future to continue progress toward the Strategic Plan target for business compliance with food safety management requirements.

2. The Board is invited to:

   - **note** evaluation of the Safer food, better business programme;
   - **discuss** options for the future of the programme;
   - **agree** the preferred option for the next phase of the programme.

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Issue

1. This paper describes progress and evaluation of the Safer food, better business (SFBB) programme, presents conclusions and options for the future.

Strategic Aims

2. The SFBB programme contributes to the FSA Strategic Aims to:

- provide guidance and support to help small retail and catering businesses such that by the end of 2010, all food businesses are actively working to achieve compliance with food safety management requirements with at least 75% fully compliant;

- better safeguard the health of consumers by reducing food-borne disease;

- work in partnership with stakeholders, particularly industry and local authorities;

- actively progress the Agency agendas of better regulation, simplification & moving enforcement toward Hampton principles.

Background

3. The Board last considered the SFBB programme in September 2006 (FSA 06/09/01). The aim of the programme is to help micro[1] and small catering and retail businesses comply with the 2006 food hygiene regulations that require businesses to put in place effective food safety management procedures. There are over 400,000 micro food premises in England. Research has shown these businesses previously found food safety management difficult to implement and that improving their standards would have a positive impact on public health by reducing food poisoning. Given the numbers of premises, the scale of activity represents a significant challenge for the Agency and its partners.

4. SFBB is a major Agency programme aimed at these small businesses with carefully researched and designed guidance, together with a toolkit of support for local authorities and grant support for local projects to directly assist small

[1] Micro businesses employ less than 10 staff

businesses. The programme has involved a wide range of stakeholders and is at the forefront of Agency activity to make real the Hampton principles of progressive enforcement.

5. The Agency has sought continuous involvement and feedback from stakeholders and the SFBB programme has been reviewed and refined to develop a wide product set with targeted support. Resources of just over £12m over the 3 years from April 2005 to March 2008 have been deployed, to directly assist businesses through the provision of innovative guidance and one to one coaching in the businesses' premises, and to build capacity for future support. Full details of the programme are described in Annex 1.

Review and Evaluation

6. A major review and evaluation of the programme was carried out during 2007 with three elements. These were: market research managed by the Central Office of Information to find out the effect of the programme from the perspective of the target small businesses, reports from local authorities that had received grants starting in 2005, and a local authority survey of business compliance. The evaluation provides a stocktake of progress so far against plans and gives evidence to shape the future programme. This section summarises the findings, fuller details are given in Annex 2.

7. Evidence from local authorities confirms grant-funded activity with businesses is in line with project plans, meaning that over 50,000 small businesses will have been directly assisted by March 2008. Over 380,000 SFBB packs have been distributed to small businesses and local authorities since the programme was launched in 2005. The programme has built capacity to deliver SFBB through independent trainers as well as training over 1,300 enforcement officers, improving mentoring skills and a providing a practical understanding of how to deliver SFBB to businesses.

8. Compliance with the food safety management requirement for all food businesses has improved from 30% in 2002 to 45% in March 2006 to 48% in March 2007. These figures are based on local authority inspections. Many businesses that have been helped using SFBB have yet to be re-inspected (as the average inspection frequency of the target businesses is once every 18 months). The 48% figure for compliance in March 2007 therefore under-reports the effect of the programme moving businesses towards full compliance. In addition, many businesses are close to compliance and actively working toward it. Evidence from the local authority grant projects shows that where support has been provided, 66% of businesses are broadly compliant shortly after the intervention in the business. Broadly compliant meaning the business is either compliant or very close to being compliant, with only minor improvements needed. The remaining 34% of businesses were making progress towards compliance.

9. Both local authorities and businesses themselves are clear that together with the guidance packs, one to one coaching in the business premises is the most effective support. Local authority reports show that progress is especially effective where collaborative links are made with local stakeholders such as trade bodies and local community groups. Many funded projects established and developed effective local partnership working, building capacity for future collaborative work.

10. The evaluation shows that the SFBB programme is making significant progress and has achieved real momentum. Independent feedback from businesses is particularly positive. There is strong evidence that having effective food safety management in place helps or improves the business in general**,** demonstrating the success of the SFBB approach which was designed to achieve this – the *better business* angle. As a result of implementing food safety management, 75% of businesses report they have improved their food safety practices, 70% report their business is more effective commercially because of it, and 45% report their business is more profitable, largely because of improved consistency, better stock control, less wastage and improved staff training.

11. The evaluation also highlights those sectors of small food businesses that require more effort if the Agency is to reach its targets. In particular, it shows from the perspective of businesses themselves, less progress has been made with sectors such as takeaways, small hotels & bed & breakfast accommodation. From the local authority perspective, there is a continuing challenge to assist harder to reach communities where there are language and communication issues and a need to further develop a shared understanding of different cuisines. The Agency has already responded to this need by developing packs for ethnic cuisines and an interactive training DVD, available in 16 languages, providing assistance to managers and training to staff in small food businesses. This DVD will be launched in January 2008 and is expected to be a further positive influence on progress.

12. Feedback from local authorities, individual businesses and other stakeholders suggest the SFBB programme is a success. It is effective in a wide range of business types, and has been particularly successful moving businesses towards compliance that had previously found food safety management difficult or impossible to implement. A flavour of the comments from stakeholders is included as quotes in the Annexes.

Future Challenges and Programme Options

13. The SFBB programme aim is to deliver a step change in food industry standards and achieve the Agency's strategic plan target of 75% compliance by 2010 with the requirement for food safety management procedures. The

programme covers England only, other programmes are underway in other U.K. countries and are subject to separate reports.

14. The review and evaluation shows that the SFBB programme has achieved a significant positive movement in compliance amongst micro and small businesses, providing cost-effective guidance and support. There is now momentum behind the programme with much enthusiasm to build on the successes already achieved. The evaluation demonstrates that free guidance packs together with one to one coaching in the businesses' premises is the most effective approach. However, despite progress made, the evidence suggests that more work is required to maintain the momentum of the programme, particularly in targeting harder to reach sectors. Given this, options for the next phase of the SFBB programme for 2008/09 onward are shown below and are layered with increasing activity and progress against different resource levels. Early indications about Agency resource prioritisation suggest that up to £1.5m a year can be made available between 2008/09 and 2010/11.

Option 1: Maintenance and Provision of SFBB guidance material

15. It is clear from stakeholders that the bed-rock of a continuing programme must be the continued availability of the SFBB guidance packs and related materials. The minimum option for the future programme is maintaining the availability of SFBB packs and support material to small businesses and local authorities. Option 1 provides maintenance, re-printing, warehousing and delivery of packs and DVDs and would cost approximately £800,000 in each of the 3 years to March 2011. Without this provision, the activity to deliver SFBB at a local level is likely to dwindle with lack of demand from businesses. Compliance levels are likely to improve only marginally because of this and the high turnover of small food businesses.

Option 2: Local authority support projects

16. Option 2 provides for project activity working with local authorities that have yet to receive significant SFBB support, and also provides resources to build on the success of some existing smaller scale local projects that had previously delivered successfully. This work would take advantage of the capacity already established to deliver projects based on one to one coaching, using the new DVD training material, and will maintain the momentum of the programme. Option 2 includes the activity in option 1 and would cost a total of about £1.5m each year.

Option 3: Support projects for hard to reach groups

17. Option 3 responds to the evaluation evidence that there is a need for focussed support for hard to reach businesses and communities. This option builds on option 2, and additionally supports local projects to deliver further business

assistance that includes communication and language support for communities and business types that have found implementing food safety management more difficult. Option 3 would cost about £2m each year.

18. The chart below shows forecast progression in compliance rates in approximate terms against different levels of resources provided by the Agency. The forecasts reflect evidence on business turnover, numbers of businesses moving to compliance by themselves, the positive effect of routine inspections by local authorities and scores-on-doors schemes. However, the target small businesses represent a highly diverse range of businesses such that these figures cannot be precise.

19. As the SFBB programme continues with more businesses moving to compliance, there will be a need for more understanding of the segment of business still working towards compliance. It will be important to measure the progress of businesses that are improving their standards and providing better protection for consumers, but may not have yet reached the point of full compliance. This will enable the Agency to refine the SFBB projects making interventions in businesses, to ensure a continued focus on improving public health, as well as advancing with the target for full compliance. It is proposed to link this work with the 'Scores on Doors' initiative, so that scoring and reporting of the stages of progress a business makes towards compliance can be given.

SFBB Options 2008/09 to 2010/11 – resources against approximate compliance levels

Option	FSA resource p.a.	End financial year compliance projection [Strategic Plan target: 75% by end 2010] *No. of businesses moved to compliance in year*			
		2007/08: Funding in place	**2008/09**	**2009/10**	**2010/11**
1	£0.8m: SFBB guidance product maintained	55% *34,750*	59% *15,500*	62% *15,500*	65% *15,500*
2	£1.5m: option 1 + further targeted grants to local authorities	**55%** *34,750*	**60%** *22,000*	**65%** *22,000*	**70%** *22,000*
3	£2m: option 2 + targeted projects for hard to reach groups & communities	**55%** *34,750*	**60%** *26,750*	**66%** *26,750*	**72%** 26,750

Conclusion

20. The SFBB programme has been successful, developing partnership working with stakeholders, helping local authority enforcement move to Hampton principles and improving consumer protection by helping micro and small businesses move to compliance in a way that has helped them be better businesses. The programme is at a mid-point, having achieved significant momentum and building capacity toward being self-sustaining. Options 2 and 3 presented here would definitely maintain momentum towards meeting the Agency's Strategic Plan target.

Board Action Required

21. The Board is invited to:

- **note** evaluation of the Safer food better business programme;
- **discuss** options for the future of the programme;
- **agree** the preferred option for the next phase of the programme.

ANNEX 1

Safer food, better business (SFBB) Background Information

Introduction

1. SFBB was launched by the Food Standards Agency in September 2005. It is a simple to use food safety management system for small catering and retail businesses. It is based on the 4Cs (cooking, chilling, cleaning and avoidance of cross contamination) of the Agency's Food Hygiene Campaign, and avoids the complexity and use of jargon associated with traditional HACCP systems. The material is designed to be practical, based on 'safe methods' which a business adapts to reflect their activity. There is minimal documentation, record keeping is by exception using a simple diary. SFBB enables small catering and retail businesses to manage food effectively, comply with legislation and provides improved protection for customers. Packs can be viewed on the Agency's website at www.food.gov.uk/sfbb .

Development of SFBB:

2. The Agency led a multi-disciplinary team to develop SFBB including enforcement officers, professional bodies, industry representatives and experts, working with the University of Salford and directly alongside 50 small catering businesses. The development of SFBB took account of the flexibility in the new food hygiene Regulation and the Government's commitment to reduce burdens on businesses. It was piloted in 40 local authorities (LAs) with over 1,000 small businesses to test effectiveness.

SFBB Guidance:

3. The current product set includes:
   - SFBB for Caterers, launched in September 2005 and updated in 2006, for small restaurants, cafes and takeaways.
   - SFBB for Retailers, launched in May 2006 – for small convenience stores, confectioners, newsagents etc.
   - SFBB for Chinese cuisine; &
   - SFBB for Indian, Pakistani, Bangladeshi and Sri Lankan cuisines, both launched in March 2007. These packs have been adapted to reflect the cuisines and specific cooking methods. The pack for Chinese cuisine is available in both English and in traditional Chinese as research and testing carried out during the development stage indicated that this was necessary.

4. Since the programme was launched, over 380,000 SFBB packs have been distributed free to small food businesses and local authorities.

Support to local authorities and businesses:

5. In addition to the packs, there is a major support programme in place:

- A toolkit of support material for LA enforcement professionals (EHPs) and trainers to use in workshops for businesses.

- Free regional training for EHPs, to help them to deliver the SFBB programme. Over 1,300 EHPs have now been trained in England.

- A grant scheme of around £10m to fund LA projects in England. LAs and other stakeholders were awarded grants for projects to assist businesses with workshops and one to one coaching in their premises.

- By March 2008, over 50,000 small businesses will have been directly helped. 263 LAs have managed 88 grant-funded projects, many of which have involved collaborations with other LAs, local colleges, business associations or community groups.

- Many projects included significant match funding.

- A national framework contract with agreed rates for consultants to run workshops and carry out one to one coaching on the behalf of LAs.

- A programme of regional meetings for LAs to share good practice.

- Publication of SFBB newsletters providing updates, case studies from businesses who have successfully implemented SFBB and features on good practice initiatives from LAs.

SFBB future developments:

6. Additional material is being developed, which includes:
   - An interactive DVD to be launched in January 2008 to complement the programme, providing a versatile training tool for managers and staff. It provides information and training in 16 languages commonly used in small food businesses, with minimal text, reflecting the need to train people from diverse communities. The tool has two sections, one will guide managers through SFBB with the aim of needing less external help from EHP's and coaches and the other section provides training in food hygiene for staff. The material will also be available to view or download on the FSA website.

- The interactive DVD will be accompanied by an information leaflet designed to provide essential information on personal hygiene for new staff in catering and retail premises. This has been designed with limited wording and a strong visual focus to assist managers to train staff with language or literacy issues.

- Vulnerable groups (care homes, childminders) - additional material is being developed which will be available from early 2008. New factsheets will cover issues such as contamination risks from mixed domestic and commercial use of kitchen facilities.

- A project working with catering colleges to assist introducing SFBB to students as part of their training is underway.

- Working with industry to encourage the uptake and implementation of SFBB in businesses. The Agency has been working with various industry stakeholders, including retailers such as Spar, Londis and Budgens, and a number of caterers such as public house chains.

ANNEX 2

SUMMARY OF FINDINGS FROM THE SFBB EVALUATIONS

1. The Agency has undertaken a milestone evaluation of the SFBB programme as a whole, gathering evidence and feedback from stakeholders including local authorities and businesses on the effects of the programme. This work has been undertaken in three strands:

   - [A] An extensive research project interviewing businesses to explore their perception of implementing a food safety management system.
   - [B] An independent academic review of final reports from a number of the local authority projects from the first tranche of grants which ended in March 2007.
   - [C] Analysis of a questionnaire which explored the level of compliance of food businesses in implementing food safety management requirements in general.

[A] FOOD SAFETY MANAGEMENT EVALUATION RESEARCH REPORT (Central Office of Information (COI) / Jigsaw Research)

Objectives

2. The Agency, through COI, commissioned an independent quantitative evaluation by Jigsaw Research, interviewing 1,143 small catering and food retail businesses across England, Scotland, Wales and Northern Ireland. The research investigated the impact on businesses of food safety management systems (FSMS). Around two-thirds of these businesses had received SFBB. The specification for the research project and interview questionnaire was developed in conjunction with the Agency's statisticians and social scientists to ensure the resulting data would be robust.

3. The businesses covered 3 key audience types:

- Businesses experiencing an intervention from a local authority (e.g. seminar or coaching);
- Businesses requesting a pack from the Food Standards Agency;
- Businesses (as far as was known) not experiencing either of the above.

4. The objectives of this research were to establish, from the perspective of the business:

- The extent businesses in the target market had implemented FSM, and which systems they had?
- The extent that implementing FSM had improved food hygiene.
- The most effective methods of intervention/assistance.
- How businesses would react to other forms of intervention?
- What the benefits of FSM are to the business.
- How else can businesses be encouraged to implement FSM.

Summary of findings:

5. Overall, FSMS have been widely adopted amongst small catering and food retail businesses. Based on their own perception, 93% of businesses claimed to have FSM in place, and of those, over three-quarters claimed it was fully implemented.

6. Business attitudes towards FSMS and SFBB in particular were highly positive, with almost universal agreement amongst those that had adopted a FSMS that

it helps them stay compliant with food hygiene legislation and this gives them confidence in the area of food safety management. There was also agreement that implementing FSM is generally easy, helps in day to day business management and is a useful tool for training staff. Many positive comments were recorded, one business said:

> *"It has given me peace of mind knowing everything is running well and staff are well trained".*

7. Of the 72% of businesses who said that their FSMS was fully implemented, 69% of businesses agreed that implementing a FSMS had increased business effectiveness, with just under half of businesses agreeing that it had improved their actual profitability. Examples of how the FSM improves effectiveness were given – almost all businesses with a FSMS reported that it helped to keep everything in one place, ¾ stated that it helped with stock control and minimising wastage. One business said:

> *"We have more of a handle on what's actually going on. It is kept on record, rather than someone having to remember, and is so easy to reference".*

8. The research found that generally speaking, larger businesses (i.e. those with 6+ employees) are more positive about FSMS as are care homes/nurseries, restaurants, pubs/clubs. Hotels/guest houses and home caterers were less positive about FSMS, whilst takeaways were more mixed in their views.

9. There was some feeling that operating a FSMS means that managing food safety takes longer than before, however most businesses acknowledged that this was time well spent and could see the benefits of operating a system.

10. Perceptions of external assistance were very positive. The FSA information packs were very well received with the vast majority wanting to see these continue in future. There were equally positive about local authority interventions, particularly one to one coaching and training courses. In addition to information packs, businesses would be highly likely to go on training courses (especially among caterers), and use DVDs and online information in the future.

[B] EVALUATION OF SPECIAL GRANT SCHEME FINAL REPORTS

11. As part of the SFBB support programme, the Agency has operated a 'special grant scheme' which awarded funding to local authorities to run specific SFBB projects within their individual districts or in collaboration with other local authorities. The scheme was delivered in two tranches and targeted micro-businesses (i.e. those with 10 or less employees). Projects in the first tranche in general did not specifically target hard to reach businesses or those serving BME cuisine, pending development of relevant support initiatives.

12. The main aim of this report was to provide an expert external overview of the first 38 final reports for projects undertaken by local authorities receiving funding from the first tranche of the scheme, and to provide a summary of the findings. The majority of the first tranche projects ran in the main between Sept 2005 and the end of March 2007.

Objectives

13. The principle objectives of the research were:-

- To identify the range of projects undertaken, including the types of collaborations between local authorities and other bodies;
- To evaluate the strengths and areas for improvement of the projects undertaken, including a consideration of the 'value for money' offered by the projects;
- To highlight good practice in the operation of the projects.

Summary of findings:

14. The key statistics are:-

No. of projects reviewed	38
No of businesses receiving face to face interventions (workshop and or one to one coaching)	22,684
Total cost to the Agency	£3,193,691
Average cost per business	£140.79
% of businesses evaluated by local authorities as being broadly compliant with food safety management requirements after interventions. [Broadly compliant meaning the business is either compliant or very close to being compliant, with only minor improvements needed. The remaining 34% of businesses were making progress towards compliance]	66%

15. The range of projects and collaborations were:

- [Of the 38 projects examined] 24 were single LA projects, and the remainder ranged from collaborations between 2 and 28 other local authorities;

- 27 projects involved the use of consultants to carry out seminars/coaching, 19 of which involved CMi who had been awarded a national framework contract;

- 8 projects involved collaborations with local colleges, aiming to build sustainability for future business support; and

- 10 projects involved collaborations with local/national business associations and community groups related to BAME cuisines in order to engage a wider target audience.

16. The main strengths, issues about value for money and areas for improvement were:

- Reports highlighted widespread positive comments received during the evaluations carried out by local authorities, with businesses commenting on the usefulness of SFBB as a food safety management system.

- Previous research highlights the difficulties faced by micro-businesses in implementing food safety management systems. The 66% success rate demonstrates the value of SFBB or similar supportive approaches in enabling these types of business to comply with food safety management requirements.

- Oldham MBC stated in their final report:

> *"After years of attempting to explain to small businesses the process of carrying out hazard analysis without a defined guide it was refreshing to have such a user friendly pack that all the delegates agreed was relevant to their business and that they felt their staff could understand."*

- Although not specifically targeted in the first tranche, 88 workshops were held specifically for businesses serving BAME cuisines. The final report for the Bath and North East Somerset project stated:

> *"It is worthy of note that the SFBB approach has secured more improvement in these sectors than any other initiative or approach used in these areas. The photographs and lack of jargon have helped the messages cross the language barriers".*

- Those projects that worked collaboratively found benefit in working with others, sharing expertise and resources, including the ability to transfer funds between local authorities. Reports noted improved relationships with businesses, and the benefits brought by collaborations with community groups and business organisations.

- The cost (to the FSA) per business of each of the projects varied from £65 to £287, with an average of £141.

- Under-estimation of project management and administration time was an issue for many of the projects, particularly where separate provision for this work had not been built into project plans. In recognition of this, the Agency highlighted the need to include sufficient time and resources for project management and administration in its grant application guidance for the second tranche projects.

- Despite considerable interest from businesses at the start of projects when the new legislation requirements were introduced, many of the projects reported subsequent difficulties in recruiting businesses to workshops. However, once they had attended and become familiar with SFBB they were much more enthusiastic, with a high rate of businesses moving on to one to one coaching.

- Whilst the first tranche of grants was not specifically targeted at BAME businesses, many of the projects indicated that earlier publication of SFBB packs for ethnic businesses would have been beneficial.

Good Practice recommendations:

17. The most successful projects were those that worked flexibly in providing support to businesses, using local knowledge and responding to business needs. A number of good practice points were identified to be fed back to local authorities. These included:

    - Extensive and positive press and publicity increased business awareness and encouraged participation in the scheme.

    - Using recognised community leaders/groups and venues to encourage participation in the programme, particularly in relation to BME cuisine.

    - Using business associations, links and expertise to access and engage a wider range of local businesses.

- Use of coaches with a catering background was valuable in encouraging empathy with businesses.

- Working with local colleges to build SFBB into established catering courses.

- A number of projects identified the use of ‘business champions’, model businesses that were valuable in promoting SFBB, providing mutual support and encouragement to other businesses, for example by providing case studies demonstrating successful implementation and tangible benefits in using SFBB.

[C] LOCAL AUTHORITY SURVEY
SUMMARY OF FINDINGS (ENGLAND)

18. A short questionnaire was sent to each local authority in England for completion in March 2006. This assessed the level of compliance with new food hygiene regulations requiring documented food safety management procedures, based on hazard analysis and critical control point (HACCP) principles. The survey was repeated in March 2007 and the findings are summarised in the table below. These are businesses that are fully compliant with the requirement for food safety management: they have effective food safety procedures in place that are followed such that safe food is produced, and the business has records in place to demonstrate this.

Table 1 Level of compliance with food safety management requirement.

Business Type	No. of businesses in survey	Compliance at 31 March 2006		No. of businesses in survey	Compliance at 31 March 2007	
		No.	%		No.	%
Manufacturer/Processor	2,611	1,344	51%	2,968	1,650	56%
Packer	311	191	61%	359	247	69%
Importers/Exporters	135	86	64%	199	142	71%
Distributors/Transporters	2,529	1,550	61%	2,712	1,807	67%
Retailers	44,483	23,207	52%	48,596	25,896	53%
Restaurants & Caterers	119,372	50,119	42%	129,582	58,640	45%
Manufacturers selling mainly by retail	1,711	710	41%	1,685	772	46%
All Businesses	171,152	77,207	**45%**	186,101	89,154	**48%**

Notes:

1. To provide a fair comparison over time, this analysis is based on the 153 local authorities that responded in both years of the survey. As these Local authorities may not be representative of other local authorities, the results should be seen as providing an indication of a trend rather than definite conclusions.

2. Compliance correlates with those businesses rated by local authorities, in accordance with the Statutory Code of Practice on Food Law Enforcement, as having a high score (0 or 5) for Confidence in Management (CIM), fully compliant with the requirement for having procedures based on HACCP principles.