Evaluation of the Food Hygiene Rating Scheme and the Food Hygiene Information Scheme: 
Process evaluation – final report

Submitted to the Food Standards Agency by:
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Main messages

The process evaluation of the Food Hygiene Rating Scheme (FHRS), running in England, Wales and Northern Ireland, and the Food Hygiene Information Scheme (FHIS), operating in Scotland, was intended to provide an early indication of the performance of the schemes – implementation, operations and perceived impacts. It is part of a wider evaluation of the schemes – impact and synthesis studies will be published later in 2014.

The research was carried out in two stages between October 2011 and June 2013 in a sample of UK local authorities. It consisted of interviews with FSA policy officials, local authority food safety officers and food business operators; focus groups with consumers and a quantitative survey of food businesses. The process evaluation is not intended to be representative of all local authorities operating the FHRS/FHIS. Therefore, the degree to which certain events were occurring or the extent of certain held views cannot be estimated fully. Rather, the findings can provide valuable insights into programme operations on the ground and the ways in which the schemes are being perceived and experienced.

Evidence from the process evaluation suggests that:

- Positive progress has been made in gaining buy-in from local authorities across the UK. Resourcing of the schemes needs monitoring to ensure food safety teams can carry out physical inspections to plan, maintain scheme administration and engage with food businesses, particularly new businesses and those with poor hygiene standards.

- In FHRS areas, positive changes in food hygiene standards have been noted by local authority officers since the introduction of the schemes, although improving poor performing food businesses was considered to be a challenge. It should be noted that conclusions about the extent to which changes are attributable to the schemes cannot be judged until a study of impacts has been completed.

- Food business operators broadly supported the FHRS/FHIS and were introducing required changes. However, operators questioned the requirement to document food safety systems and, in FHRS areas, perceived inconsistencies about inspections and scoring which raised concerns. A more collaborative relationship between local authorities and food businesses could encourage operators to seek advice towards improving hygiene standards and would recognise the vital role businesses have in the delivery of the FHRS/FHIS.

- There was positive but limited evidence about competition between food businesses over ratings/inspection results. This is an area for further
development. The FSA should investigate how competition can act as a mechanism for driving up hygiene standards.

- Consumer awareness of the schemes was perceived to be low by all stakeholder groups. This is another area for development as consumer pressure to improve food hygiene standards is integral to the FHRS/FHIS theory of change. Further national communication activities, in tandem with local promotion of the FHRS/FHIS, could help to raise the profile of the schemes.

- The degree to which FHRS/FHIS stickers and certificates are voluntarily displayed by food businesses may be limiting consumer access to food hygiene information and consequently restraining the use of the schemes. To address this, the FSA should focus more efforts on increasing display on food business premises. Mandatory display, which was endorsed by local authorities and consumers, is one approach that should be considered. The experience in Wales should be closely monitored to assess the feasibility of such a strategy.

- The research identified a gap in knowledge about how food hygiene information is interpreted and used by consumers. The FSA should identify and test options for encouraging the use of hygiene information in food purchasing decisions. Consumers have requested more details on the FHRS/FHIS inspection process and the rationale for specific ratings/inspection results but little is known about how this information would be applied.

- It appears that food hygiene information is more likely to be used when consumers are making deliberative decisions about eating outside the home, like planning for a special occasion or in unfamiliar territory, such as on holiday. These insights could be developed further when promoting use of the schemes.
1 Executive Summary

This report presents findings from the process evaluation of the Food Hygiene Rating Scheme (FHRS) operating in England, Wales and Northern Ireland and the Food Hygiene Information Scheme (FHIS) that is operating in Scotland. The process study is part of a wider evaluation of the schemes – impact and synthesis studies will be published later in 2014.

1.1 Background

- The FHRS and FHIS are run by local authorities in partnership with the Food Standards Agency (FSA). Both schemes are based around the statutory programme of planned inspections carried out by local authority food safety teams to ensure that food businesses are complying with food hygiene law. They apply to food businesses and other establishments that provide food directly to the consumer. The standard of hygiene assessed for a food business is reflected in an FHRS rating (ranging from a ‘0’ at the bottom to a ‘5’ at the top) or an FHIS inspection result (‘Pass’ or ‘Improvement Required’).

- The schemes are intended to provide information on the standard of food hygiene of individual food businesses so that members of the public can make informed choices about where to buy food and where to eat away from home. Food hygiene is expected to improve as food businesses respond to public demand for higher standards. The ultimate goal of the schemes is to reduce the incidence of foodborne illnesses in the UK population.

1.2 Process evaluation focus and methods

- The process evaluation provides an early indication of FHRS/FHIS performance with rich data that will help to clarify and explain FHRS/FHIS evaluation impact analyses to be reported in 2014. The overall aim of the full evaluation is to assess whether FHRS and FHIS are operating as intended as set out in the programme theories of change (refer to Appendix 2).

- The process evaluation was carried out in two phases: stage 1 (October 2011 to February 2012) focused on early implementation and delivery of the FHRS/FHIS while stage 2 (February to June 2013) focused on established operations of the FHRS/FHIS and perceived impacts. An additional objective of stage 2 was to gain understanding of the attitudes and experiences of those food businesses with relatively poorer standards of food hygiene.¹

¹ Refer to section 2.3 for more details on the research methods.
Data collection for the full process evaluation covered the range of stakeholders and consisted of: interviews with FSA policy officials, local authority food safety officers and food business operators; focus groups with consumers and; a quantitative survey of food businesses. The report also draws on other relevant research that has been carried out with consumers and food businesses since the launch of FHRS/FHIS.

1.3 Findings

Local authorities

- Local authority officers supported the FHRS/FHIS and were positive about using a common system to communicate food hygiene standards. Operations have bedded in to the regular programme of inspections. On the whole, workloads were considered to be manageable. However, local authorities that were not meeting their programme inspection targets attributed this to limited staff resource. Food safety teams that did not have administrative support considered the extra paperwork associated with the schemes to be a burden.

- Overall, food business demand for appeals and re-visits has been lower than had been envisaged by local authority officers. In Wales, however, requests for re-visits have added strain to workloads. This was attributed to mandatory display of ratings anticipated from November 2013.

- Food safety teams have put considerable effort into ensuring consistency of FHRS ratings/ FHIS inspection results and, as a consequence, local authority officers were confident they were achieving consistency within local authorities. But in Wales and England, officers felt there were inconsistencies in scoring FHRS ratings across local authorities.

- In all FHRS countries local authority officers reported increased rates of compliance over time. However, they identified a core group of low performing food business operators with whom they found it difficult to encourage positive changes. In Scotland local authority officers felt that greater awareness of the FHIS was required in order to boost the effectiveness of the scheme.

- Among food businesses with an FHRS rating of ‘3’, ‘4’ or ‘5’ and those with a FHIS ‘Pass’ inspection result, voluntary display was lower than expected by local authority officers. They felt there was little else food safety teams could do to persuade businesses to display their ratings/ inspection results. To encourage engagement, local authority officers endorsed mandatory display and wider publicity.
Food businesses

- Food business operators broadly supported the FHRS/FHIS, recognised the value of a uniform system for assessing food hygiene practices and were aware of their rights to appeal and to request a re-inspection. The incremental FHRS ratings gave food businesses a concrete structure to strive toward. Negative views tended to arise when an FHRS rating or FHIS inspection result was lower than expected and considered unjustified.

- Reported display of stickers/certificates in a location that was publically visible was associated with ‘Pass’ or higher levels of compliance. Proprietors said that a prime reason for displaying was to communicate their food hygiene standard to customers.

- Food business survey evidence highlighted widespread implementation of improvements primarily in order to achieve higher FHRS ratings or an FHIS Pass result. Motivations to improve ratings/inspection results were driven partly by business pride and concern about losing trade. There was also evidence suggesting that food business proprietors were starting to compare their ratings/inspection results with competitors. In Wales there was the added impetus that display of ratings would be compulsory from November 2013 and businesses were concerned about their FHRS ratings going on public display.

- Experiences reported by poor performing food businesses helped to shed light on the FHRS/FHIS from their perspectives. Proprietors expressed frustration with the inspection system and perceived unfairness about the rationale for poor ratings/inspection results. Proprietors felt the Confidence in Management scoring category was too paperwork driven and a burden on small independent businesses; communications with local authority officers could be more collaborative and supportive as business staff felt vulnerable; more information was needed on how to achieve full compliance and about the rationale for the frequency of scheduled inspections; there were real barriers to making some changes such as costs and building regulations. Finally, there was a general view among businesses that customers are not engaged with the FHRS/FHIS and other factors like quality of food and service were more important to maintaining trade.

Consumers

- In general, the focus group research found that consumers supported and welcomed the FHRS/FHIS in principle, recognising that it provides a useful, objective indication of food hygiene standards. Very few FHIS Improvement Required results or FHRS ratings of 3 and below had been encountered.
• As display increases, focus group participants felt they would increasingly use the schemes to choose between food businesses. It was acknowledged, however, that on most eating occasions, other decision criteria would influence their choice (particularly convenience or taste).

• The priority placed on different decision criteria, including hygiene considerations, can depend on the eating occasion. Hygiene standards may be given less priority, for example, when using a favoured regular eating place, following an urge for a takeaway, or when in a hurry at lunchtime. Expectations were higher for a special occasion. Hygiene information would be more useful when consumers are taking time to deliberate eating options like for a special occasion or when choosing premises in new locations such as on holiday.

• On the whole the simplicity of the schemes was appreciated with a clear rating system under the FHRS and a simple Pass/ Improvement Required under the FHIS. When probed to consider minimum acceptable standards it became clear, however, that consumers were uncertain how to interpret the FHRS scores while in Scotland consumers were unclear of the implications of an Improvement Required inspection result.

• In order to get more benefit from the FHRS/FHIS consumers felt that display of inspection ratings/results should be mandatory for food businesses and that wider advertising was needed to raise the profile of the schemes.

Theories of change

• Theories of change models for FHRS/FHIS spell out the policy intent for behaviour change within each of the target populations (refer to Appendix 2). The expectations for the schemes are far reaching – requiring the buy-in of local authorities and the retail food and catering sectors, influencing consumer food purchasing behaviour and, in the longer term, extending to the reduction of food borne illnesses. The models were used to track progress.

• The data suggest that more needs to be done to encourage food businesses to display their ratings/inspection results and to prompt consumers into using food hygiene information. Once customer use of the schemes is on the increase then it is more likely that food businesses will sense pressure to improve their hygiene standards.

• Slower progress in reaching the public is understandable because, as the end users of the schemes, the other elements and events identified in the theories of change need to be set in place first.

• Progress on the theories of change for each group is summarised in the table below.
## Tracking progress against the theories of change

<table>
<thead>
<tr>
<th>Positive progress</th>
<th>Weak progress</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Local authorities</strong></td>
<td></td>
</tr>
<tr>
<td>- Scheme take-up &amp; commitment</td>
<td>- Consistency in scoring FHRS ratings</td>
</tr>
<tr>
<td>- Guidance</td>
<td>- Resourcing</td>
</tr>
<tr>
<td>- Forums for development &amp; support</td>
<td></td>
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<tr>
<td><strong>Food businesses</strong></td>
<td></td>
</tr>
<tr>
<td>- Awareness increasing</td>
<td>- Awareness lags in Scotland</td>
</tr>
<tr>
<td>- Perceived increased compliance*</td>
<td>- Display of ratings/results lower than expected by local authorities</td>
</tr>
<tr>
<td>- Perceived increased display of ratings/results</td>
<td>- Public awareness perceived to be low</td>
</tr>
<tr>
<td>- Competition – comparing ratings/results</td>
<td></td>
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<tr>
<td><strong>Consumers</strong></td>
<td></td>
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<tr>
<td>- Awareness increasing</td>
<td>- Awareness lags in Scotland</td>
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<tr>
<td>- Insights on potential use</td>
<td>- Further clarification to enhance understanding</td>
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<tr>
<td></td>
<td>- Access to food hygiene information limited by rates of display</td>
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<tr>
<td></td>
<td>- Use of the schemes in decisions about food purchases</td>
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</tbody>
</table>

* This evidence needs to be treated with caution as trend statistics cannot identify whether or not the changes are attributable to the FHRS/FHIS.

## 1.4 Recommendations

Based on the evidence, the following recommendations are put forward for the FSA and local authorities to address:

- **Continue support to local authority food safety teams** with on-going training in all countries and cross-local authority forums to address inconsistencies in scoring FHRS ratings.

- **To enhance food business engagement in the schemes, nurture a collaborative relationship between local authorities and food businesses:**
  - Work with food business operators to identify effective modes of communication.
  - Inform food businesses operators about changes in food hygiene requirements that may affect FHRS ratings/ FHIS inspection results.
  - Towards the goal of improving hygiene standards, encourage operators to initiate contact for clarification and advice.
To improve the synergy between ratings/results and food hygiene standards, explore ways to encourage operators to request a re-inspection after changes have been addressed.

- Ensure local authorities provide food businesses with full information on how to comply with food hygiene law in a comprehensible format (e.g., avoiding technical jargon and use of other modes of communication to overcome language barriers).

- Explore options to address concerns about documentation of food safety systems, particularly for small businesses and those with English language limitations.

- Investigate how competition over ratings/inspection results can be encouraged among food businesses. To date there has been little information on how competition acts as a mechanism for improving food hygiene standards.

- Encourage the display of FHRS ratings/FHIS inspection results more vigorously among food business operators. Mandatory display, which was highly endorsed by local authorities and consumers, is one approach that should be considered. Learning from the experience in Wales will help to refine this strategy.

- Make food hygiene information more accessible to consumers by promoting the FSA ratings website and smartphone app more widely. Consider partnering with existing resources that provide information on eating out, like online food reviews.

- Consider providing more details on the composition of ratings/inspection results to make the system more transparent. Further research is warranted to test how this information might be interpreted and used by consumers.

- Raise the public profile of the schemes through further national communication activities, in tandem with local promotion of the FHRS/FHIS.

- Given the above activities, continue to monitor and address resourcing of local authority food safety teams to ensure there are sufficient staff for FHRS/FHIS inspections, scheme administration and promotion, and for tailored communications with individual food businesses.
2 Introduction

This report presents findings from the process evaluation of the Food Hygiene Rating Scheme (FPRS) operating in England, Wales and Northern Ireland and the Food Hygiene Information Scheme (FHIS) that is operating in Scotland. The process study is part of a wider evaluation of the schemes – impact and synthesis studies will report later in 2014.

For further details on the FPRS/FHIS and plans for the full evaluation, readers can refer to the stage one process study report.²

2.1 Background

The FPRS and FHIS are run by local authorities in partnership with the Food Standards Agency (FSA). The FPRS was launched in November 2010 and the FHIS was piloted from November 2006 with full roll out beginning January 2009. The schemes operate through a programme of planned inspections carried out by local authority food safety teams to ensure that food businesses³ are complying with food hygiene law. This is supported by FSA guidance, the ‘Brand Standard’⁴ for FPRS and separate guidance for local authorities in Scotland on the operation of the FHIS. The standard of hygiene assessed for a food business is reflected in the FPRS/FHIS inspection result determined.

The schemes are intended to provide information on the standard of food hygiene of individual food businesses so that members of the public can make informed choices about where to buy food and where to eat away from home. Food hygiene is expected to improve as food businesses respond to public demand for higher standards. The ultimate goal of the schemes is to reduce the incidence of foodborne illnesses in the UK population.

In England, Wales and Northern Ireland, food businesses are given an FPRS rating on a six band scale representing the level of compliance with food hygiene law – ranging from ‘0’ (urgent improvement necessary) to ‘5’ (very good).

² http://www.food.gov.uk/science/research/ssres/foodssafety/fs244011/#anchor_3
³ The schemes apply to businesses and other food establishments that supply food directly to the consumer.
In Scotland, food businesses can achieve an FHIS inspection result of ‘Pass’ or ‘Improvement Required’.  

Food businesses are encouraged to display a sticker or certificate showing their rating/inspection result in a location that is publically visible. Currently display is voluntary. However, from November 2013 local authorities in Wales entered an 18 month transition period after which all businesses will be required by law to display their FHRS sticker. Additionally, the FSA in Northern Ireland is currently investigating the feasibility of making the display of FHRS ratings compulsory.

Ratings and inspection results are also available to the public through the FSA website and through mobile smartphone apps.

At the time of reporting, the FHRS was running in all areas of Wales and Northern Ireland. In England, it is expected that the scheme will be running in 99% of local authority areas by the end of 2013. The FHIS is currently being rolled out in Scotland and all Scottish local authorities have committed to adopt the scheme.

More details on the FHRS and the FHIS are available in Appendix 1.

### 2.2 Process evaluation objectives

The process evaluation provides an early indication of FHRS/FHIS performance with rich data that will help to clarify and explain FHRS/FHIS evaluation impact analyses to be reported in 2014. The overall aim of the full evaluation is to assess whether FHRS and FHIS are operating as intended as set out in the programme theories of change (refer to Appendix 2).

The process evaluation was carried out in two phases: stage 1 (October 2011 to February 2012) focused on early implementation and delivery of the FHRS/FHIS while stage 2 (February to June 2013) focused on established operations of the FHRS/FHIS and perceived impacts. An additional objective of stage 2 was to gain

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5 Information on the scheme can be obtained at [http://www.food.gov.uk/policy-advice/hygenratings/](http://www.food.gov.uk/policy-advice/hygenratings/).
understanding of the attitudes and experiences of those food businesses with relatively poorer standards of food hygiene.

2.3 Methods

The process evaluation took a systematic approach to collecting and analysing feedback on the schemes, using both quantitative and qualitative social science techniques. Data collection for the full process evaluation covered the range of stakeholders and consisted of: interviews with FSA policy officials, local authority food safety officers and food business operators; focus groups with consumers and; a quantitative survey of food businesses. Details on the stage 1 methods are provided in a separate report. Methods used in stage 2 are outlined below with further details provided in Appendix 3. Fieldwork instruments are supplied in Appendix 4.

2.3.1 Stage 2 fieldwork

An initial sample of 30 participating local authorities was drawn across the UK – England (15), Wales (5), Northern Ireland (5) and Scotland (5). The sample was intended to include local authorities with a high proportion of low FHRS ratings (0-2) or ‘Improvement Required’ FHIS results, relative to the other local authorities in that country. The study consisted of four interlinked strands of fieldwork that took place between February and June 2013:

- Telephone interviews with a food safety officer in a management role within each of the sampled local authorities (30 in total).
- Focus groups with consumers were conducted in 12 of the 30 local authorities across England (4), Wales (3), Northern Ireland (3) and Scotland (2). Each group consisted of 7-8 participants who were selected to ensure awareness of the FHRS/ FHIS and interest in new eating experiences and/or concern for food hygiene.
- The 30 local authorities served as the sample frame for selecting 8 areas in which the remaining fieldwork took place – 2 local authorities in each country. Overall the sample included a range of area and demographic characteristics in order to capture variation among the stakeholder groups.
- A telephone quantitative survey (n=800) was conducted with food business operators located within the 8 local authorities. The sample was designed so that

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6 [http://www.food.gov.uk/science/research/ssres/foodsafetyss/fs244011/#anchor_3](http://www.food.gov.uk/science/research/ssres/foodsafetyss/fs244011/#anchor_3)

7 Based on a December 2012 data capture of the distribution of FHRS ratings/ FHIS results, a percentage 0-2/ Improvement Required was calculated for each local authority participating in the national scheme. Within each country, local authorities were ranked on this tally and those with a higher percentage were prioritised, balanced with the other selection criteria.
findings could be reported separately for food businesses receiving each level of FHRS rating/ FHIS inspection result as well as by national scheme and country.⁸

- 67 qualitative interviews were conducted with food business operators within the 8 local authorities sampled. Because a focus of the research was to better understand the attitudes and motivations of poorer performing food businesses in regards to food hygiene standards, the sample was concentrated on food businesses with a 0-2 FHRS rating or an Improvement Required FHIS inspection result.

2.3.2 Interpretation of the findings

It is important to bear in mind how the results from this report can be interpreted. The quantitative survey provides a snapshot on the opinions of FHRS/FHIS inspected food business operators. Any differences reported are statistically significant at the 95% level of confidence⁹ unless stated otherwise. Food businesses in 8 local authorities across England, Wales, Northern Ireland and Scotland were surveyed. The research is not intended to be a representative sample of all food businesses in the UK that are within scope of the schemes. Rather the survey identifies some of the prevalent views held by food businesses at one point in time. These common (and less common) views, when considered with the other stakeholder research, can help to inform plans for FHRS/FHIS publicity and policy.

Qualitative research is intended to identify a range of views and experiences in more depth and to provide possible explanations on why the views are held. In the research with food businesses, the qualitative research can help to shed light on the different views expressed in the quantitative survey. The data can also uncover unanticipated issues and help to refine messages for future FHRS/FHIS policy and publicity.

2.4 Report outline

The report collates findings from both stages of the process evaluation, organised in five substantive chapters. Chapters 3 through 5 report findings from the perspectives of local authorities, food business operators and consumers respectively. Chapter 6 considers the progress of the schemes in relation to the theories of change. Process evaluation conclusions and recommendations for developing the FHRS/ FHIS further are presented in Chapter 7.

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⁸ For more details on the survey methods refer to the report: ‘FHRS/FHIS Evaluation – Food Business Survey’ available at: insert URL.

⁹ This is where there can be 95% confidence that the results are not due to a chance event.
The report also draws on other relevant research that has been carried out with consumers and food businesses since the launch of FHRS/FHIS. This research is cited where relevant and is listed in the References.

A full report on the process evaluation survey of food businesses is also available.\textsuperscript{10}
3 Local Authorities

This chapter presents process evaluation findings from the perspective of local authority food safety officers in relation to FHRS/FHIS operations and delivery: food safety team processes and food business safeguard measures; changes to food business hygiene standards attributable to the schemes and; display of ratings/inspection results.

3.1 General perceptions on FHRS/FHIS

Overall, local authority officers were positive about the scheme, endorsing it as ‘a useful tool’ for inspection staff to encourage food businesses to improve food hygiene standards. There was a general perception that hygiene standards among food businesses were rising as a result of the FHRS and FHIS. Local authority officers felt that more food businesses were achieving a ‘5’ rating in FHRS areas, and there had been a reduction in the numbers of ‘problem premises’.

3.2 Food safety team processes

3.2.1 Tasks and workload

Progress on inspections varied by country. In England and Wales higher risk premises (A-C)\(^ {11}\) were prioritised and these inspections were up to date. But not all lower risk food businesses had been rated due to limited staff resources. Inspections of all risk-rated establishments were said to be up to date in Northern Ireland. In Scotland an on-going rolling programme was underway but challenges in keeping up to date were reported due to the volume of food businesses, staff resource issues and implementation of the E. coli O157 guidance.

Local authorities continued to follow the annual inspection programme which was generally reported to be unaffected by the schemes. Local authority officers did identify some changes or additions to work tasks:

- Longer inspection visits – physical inspections were reported to be longer than in the past, this was particularly the case with lower scoring food businesses where time is required to gather evidence (e.g., taking photographs, inspecting documents) and to explain inspection results to the operator. Longer visits were considered ‘manageable’ in terms of workloads.

\(^{11}\) The frequency of food hygiene interventions is determined by the assessed risk of food premises, assigned as categories A through E, with A being the highest risk. Refer to Appendix A for more information.
• Greater attention to scoring – it was reported that staff were taking more care and slightly more time when producing risk scores as a result of FHRS. This was also viewed as a positive change.

• Extra administrative tasks – paperwork, reports and correspondence associated with the scheme were found to be more cumbersome for teams that lacked administrative support.

3.2.2 Relationships with food businesses

Local authority officers indicated that relationships between inspection staff and food businesses had remained about the same under the FHRS/FHIS, although tensions had been created with some lower rated businesses which were resentful and challenged the rating system. It was also noted that a change in relationship may emerge if and when display becomes mandatory.

3.2.3 FSA Guidance

Local authority officers were satisfied with the FHRS/FHIS guidance. The Brand Standard was generally said to be clear, comprehensive and useful for practical guidance on scoring. In Scotland flow diagrams were identified as a useful aid for distinguishing between major and minor non-compliance. Suggestions were made to improve elements of the guidance:

• More information about incorporating the E. coli O157 cross-contamination guidance into the process was requested in FHRS areas with suggestions that real-life scenarios and practice examples be provided.

• Clarification was requested on procedures for rating mobile traders and low-risk businesses such as bed & breakfasts and pubs that do not serve food.

• Dissatisfaction was expressed regarding the scoring system for the Confidence in Management category of FHRS. There was a view that the scoring was unfair to businesses that had inadequate documentation of food safety management systems, even if their hygiene standards were good in other respects. Local authority officers suggested there should be a moderate score of ‘15’ for assessing Confidence in Management so that food businesses are not automatically awarded a ‘1’ rating due to weak documentation of food safety management systems.

3.2.4 Scoring consistency

Stage 1 of the process evaluation explored the practical issues involved in introducing and operating the schemes during the first months of implementation. This research found that maintaining consistency in the scoring for food hygiene was
an issue for food safety teams. Despite extra training to address inconsistencies, there was a general feeling that the scoring for FHRs was too open to individual interpretation. The stage 2 research found that, over time, these concerns seem to have abated as officers reported that within team consistency in scoring FHRs ratings had improved and was not considered to be an issue.

Food safety teams have put considerable effort into ensuring consistency of FHRs ratings/ FHis inspection results. FSA guidance, in-house training, team meetings and workshops had been welcomed. Cross-local authority activities, internal consistency checks, informal team discussions and use of case scenarios were identified as the most helpful for maintaining consistency.

While local authority officers were confident they were achieving consistency within food safety teams, those in Wales and England felt there were inconsistencies in scoring FHRs ratings across local authorities. Cross-local authority scoring was not perceived to be an issue in Northern Ireland and Scotland. To address consistency issues, local authority officers welcomed an on-going programme of national/ regional consistency training and discussion forums, as well as enhanced FSA materials containing more examples of scoring scenarios.

3.3 Food business safeguard measures

Respondents reported they had received fewer formal communications from food businesses about the FHRs/FHis than anticipated. Anxieties expressed at stage 1, that resources would be inadequate for re-visits and appeals, have therefore proven largely unfounded. Requests for re-inspection/re-visits were the most common type of formal communication while appeals, ‘right to reply’ and complaints were relatively rare and not all inspection teams had experience of them. Consequently, re-inspection requests and appeals have had little impact on workloads as local authority officers have managed to fit them in to their regular inspection schedules. Wales, however, is an exception where requests for re-inspections were said to have added strain to busy schedules. This was attributed to the announcement that display of FHRs ratings would become compulsory in November 2013 and local authority officers in Wales were concerned that these formal requests would further increase. It should be noted, however, local authority officers reported that requested re-inspections/ re-visits tended to result in a higher ratings so the extra work was said to be ‘paying off’.

According to local authority officers, requests for re-visits were primarily associated with lower rated (0-2) food businesses that had been downgraded due to poor documentation of food safety management systems, for example.

12 The FHRs and FHis incorporate safeguards to ensure fairness to businesses. This includes: i) an appeal procedure, ii) a mechanism for requesting a re-inspection/re-visit for the purposes of re-scoring when improvements have been made and iii) a ‘right to reply’.
In FHRS areas, there was a concern that resources for re-visits should be reserved for non-compliant businesses as opposed to operators rated ‘3’ or ‘4’ who wanted to improve their rating. Requests for re-visits from businesses rated ‘3’ or ‘4’ were seen as a burden to the system because these businesses were already broadly compliant. It was suggested that these businesses should be charged a fee for re-visits.

3.4 Changes to food hygiene standards

In England, Wales and Northern Ireland, there was a general perception that hygiene standards were rising on the whole although positive change in terms of scheme engagement and hygiene practices among low rated food businesses was considered to be an ‘uphill battle’. Local authority officers described a split between food business operators who cared about food hygiene and the schemes, and those who did not. The former group usually received higher ratings and were unhappy if they did not. The latter group usually received low ratings (0-2) and tended to be associated with ethnic-minority-owned businesses whose staff struggled with English, and food businesses that rely on the late night economy.

In general, the local authority officers sampled in Scotland reported they had detected little change in attitudes among food business since the launch of FHIS. The more conscientious businesses tended to receive a ‘Pass’ result while those assessed as ‘Improvement Required’ were less motivated to make changes. There was an impression that food businesses do not yet see the benefit of the scheme because consumers are not fully engaged. Overall, the lack of change in business attitudes was attributed to the low profile of the scheme.

In both schemes, difficulties engaging some businesses were attributed to difficult economic times (as proprietors were more concerned about shrinking profits than about food hygiene), to different cultural practices concerning food preparation/hygiene and to the low profile of the FHRS/FHIS.

Local authority officers attributed positive changes in FHRS areas partly to the scheme itself for drawing attention to the food safety categories. It was noted that more food businesses were asking for clarification on their ratings. Positive changes were also attributed to additional work and initiatives with low rated food businesses, which included:

- improving documentation of food safety management systems
- on-site advice for businesses with a 0-2 rating
- seminars on food hygiene practices or focusing on the inspection criteria (particularly Confidence in Management)
- one-to-one coaching on specific hygiene practices
- use of foreign language interpreters to help with communications
Unlike in the other countries, local authority officers in the sample from Scotland reported there had not been any local initiatives to help improve the hygiene practices of non-compliant food businesses.

### 3.5 Display of ratings/results

Local authority officers reported that the display of inspection outcomes was lower than expected among food businesses with a FHRS rating of ‘3’, ‘4’ or ‘5’ and those with a FHIS ‘Pass’ inspection result. They felt there was little else food safety teams could do to persuade businesses to post their ratings/results. Officers said they routinely encouraged food businesses to display their ratings during inspections and/or in the covering letter accompanying the certificate along with the exhortation, for example, ‘we strongly encourage you to display this’.

One reason given for the low incidence of display was that businesses have little incentive to do so; given the low visibility of stickers/certificates and the perception that public awareness of the scheme was low, displaying a high rating (as opposed to no rating) made little difference to the business.

All local authority officers agreed that it should be mandatory for food businesses to display FHRS ratings/ FHIS inspection results and that this was necessary to add clout to the scheme. There was also a view that making display of FHRS ratings compulsory would encourage more low rated food businesses to comply.

Food safety officers raised concerns about resources (staff and time) needed for monitoring and enforcement of mandatory display. It was anticipated that mandatory display would lead to an increase in formal requests for re-inspections and appeals as food business operators would be motivated to receive higher ratings/ inspection results. To help address these issues, local authority officers suggested fixed penalty fees for non-display, involvement of other staff (e.g., Environment Wardens) to help police the system and, in FHRS areas, charging a re-visit fee to food businesses that are broadly compliant (rated 3 or better).

### 3.6 Summary

Local authority officers supported the FHRS/FHIS and were positive about using a common system to communicate food hygiene standards. Operations have bedded in to the regular programme of inspections. On the whole, workloads were considered to be manageable. However, local authorities that were not meeting their programme inspection targets attributed this to limited staff resource. Food safety teams that did not have administrative support considered the extra paperwork associated with the schemes to be a burden.

Overall, food business demand for appeals and re-visits has been lower than had been envisaged by local authority officers. In Wales, however, requests for re-visits
have added strain to workloads. This was attributed to mandatory display of ratings anticipated from November 2013.

Food safety teams have put considerable effort into ensuring consistency of FHRS ratings/ FHIS inspection results and, as a consequence, local authority officers were confident they were achieving consistency within local authorities. But in Wales and England, officers felt there were inconsistencies in scoring FHRS ratings across local authorities.

In all FHRS countries local authority officers reported increased rates of compliance over time. However, they identified a core group of low performing food business operators with whom they found it difficult to encourage positive changes. In Scotland, local authority officers felt that greater awareness of the FHIS was required in order to boost the effectiveness of the scheme.

Among food businesses with an FHRS rating of ‘3’, ‘4’ or ‘5’ and those with a FHIS ‘Pass’ inspection result, voluntary display was lower than expected by local authority officers. They felt there was little else food safety teams could do to persuade businesses to display their ratings/ inspection results. To encourage engagement, local authority officers endorsed mandatory display and wider publicity.
4 Food Businesses

This chapter presents process evaluation findings from the perspectives of food business operators in relation to FHRS/FHIS operations and delivery: food business safeguard measures; changes to food business hygiene standards attributable to the schemes and; display of ratings/inspection results.

4.1 General perceptions on FHRS/FHIS

Evidence from the food businesses survey, conducted in the 8 case study areas found an association between satisfaction and ratings/inspection results. In FHIS areas, 97% of businesses who reported a ‘Pass’ inspection result were satisfied with the result they received, compared, not surprisingly, with 64% of businesses who reported an ‘Improvement Required’ result. In FHRS areas, businesses which reported a rating of 4-5 were more likely to be satisfied with their rating (93%), than those who received a rating of 3 (55%) or a rating of 0-2 (24%).

In the qualitative research, food business operators broadly supported the FHRS/FHIS and recognised the role of a uniform system for assessing food hygiene. The scheme was viewed as keeping operators ‘on the ball’ while the incremental FHRS ratings gave food businesses a concrete structure to strive toward. There was a view that the schemes are more appropriate for higher populated areas with more passing trade as opposed to small towns which rely on local business and regular customers.

In terms of the FHRS, proprietors with a ‘5’ or ‘4’ rating were generally satisfied with the scheme and viewed the rating as recognition for their efforts. Those with ratings below a ‘3’ were less satisfied and described them as ‘a bit harsh’ or ‘not entirely fair’. Respondents with a ‘3’ rating tended to accept that there was room for improvement, had made changes and were hoping for a higher rating next time.

In Scotland, negative views tended to arise when an ‘Improvement Required’ result was considered unjustified. There was also concern that the simple dichotomy of the FHIS did not indicate the degree to which a food business ‘passed’ or ‘required improvement’ – a concern also raised by consumers (refer to section 5.4).

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13 The survey did not probe why food businesses with an Improvement Required result or a rating of 0, 1 or 2 were satisfied. This topic should be addressed in future research on the schemes.

14 A view which is consistent with findings from the consumer focus groups which highlighted that people are less likely to be influenced by hygiene ratings/inspection results when using a regular or favourite premise (refer to section 4.3).
4.1.1 Perceived inconsistencies in FHRS areas

Food business operators in FHRS areas perceived inconsistencies with the scheme:

- Inconsistencies between food safety officers. Site inspections were perceived to vary according to the individual local authority officer.
- Inconsistencies in rating outcomes observed by proprietors operating in different local authorities despite following the same food hygiene procedures.
- Operators who had worked in multiple food businesses felt there were inconsistencies with premises they perceived as less hygienic achieving higher ratings than they felt was warranted.
- It was noted that inspections during peak versus off-peak periods (e.g., different seasons, different times of day) could result in a different rating. In practice, inspections were said to place food businesses at a disadvantage when the local authority officer arrived during ‘awkward’ times such as: extremely busy lunch periods; during the first week of a business opening; and when management/experienced staff were away.

4.1.2 One size does not fit all

In the qualitative research, a recurring theme among food business operators was the view that the FHRS should not be standardised across all types of food business. Moreover, it was felt that the current system does not reflect all the controls that are necessary for businesses that prepare food throughout the day (as opposed to breakfast only, for example) and those that prepare food from raw ingredients (as opposed to frozen, for example). There was a perception that a one-size-fits-all scheme was unfair with some food businesses able to achieve high ratings more easily than others (comparing, for example, an all-day restaurant to an evening takeaway to a petrol station shop).

4.2 Food business safeguard measures

Evidence from the food business survey (shown in Table 4.1) indicates that awareness of the right to a re-visit, the right to appeal and the right to reply were all relatively high in FHRS areas (at 81%, 79% and 74% respectively) but lower in FHIS areas (at 67%, 64% and 56% respectively). Use of these safeguard rights among the surveyed businesses was low, however. Of the three safeguards, businesses were most likely to report having exercised their right to request a re-visit (7% in Scotland, 17% elsewhere). 2% reportedly used their right of appeal in Scotland (under the FHIS) and 8% elsewhere (under the FHRS). 2% used their right to reply in Scotland (under the FHIS) and 8% elsewhere (under the FHRS). The majority of businesses that had used a safeguard found the process easy and perceived it as fair.
Table 4.1: Awareness and use of business safeguards

<table>
<thead>
<tr>
<th></th>
<th>FHRS area</th>
<th>FHIS area</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>%</td>
<td>%</td>
</tr>
<tr>
<td><strong>Right to request a revisit</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Awareness</td>
<td>81</td>
<td>67</td>
</tr>
<tr>
<td>Use</td>
<td>17</td>
<td>7</td>
</tr>
<tr>
<td><strong>Right to appeal</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Awareness</td>
<td>79</td>
<td>64</td>
</tr>
<tr>
<td>Use</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td><strong>Right to reply</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Awareness</td>
<td>74</td>
<td>56</td>
</tr>
<tr>
<td>Use</td>
<td>8</td>
<td>2</td>
</tr>
</tbody>
</table>

Adapted from Figures 4.2 and 4.3 IFF Research (2014) Survey of food businesses.

Evidence from the qualitative interviews with food businesses suggests that the low use of safeguards among food businesses reflects, in some instances, a reluctance to engage with local authority inspection teams. Proprietors were of the view that inviting local authority officers to visit was a risky strategy as new, unanticipated transgressions might be found, ‘no matter when they come in, no matter what you do, they’re going to find something else ... so we’ll never call them in.’ Moreover, there were reports that operators were reluctant to initiate a re-visit because inspections were a source of anxiety and staff were ‘terrified’ of local authority officer visits.

Among those aware of the safeguards other reasons for non-use included:

- being too busy
- being more focused on economic survival than the FHRS rating/ FHIS inspection result
- plans to request a re-visit once changes had been made
- not being clear what further changes were needed to merit a higher rating

Those not aware of the safeguard measures had assumed the business had to accept the rating/ inspection result they received, implement changes, and wait for the next scheduled inspection.
4.3 Changes to food hygiene standards

Several strands of evidence from the food business survey highlight the extent to which the FHRS/FHIS has driven improvements in hygiene standards.

Most businesses (81%) that had not achieved an FHRS rating of ‘5’ or an FHIS ‘Pass’ result said that they had implemented improvements, for example:

- changes to cleaning procedures
- improved food handling practices and procedures
- developing/improving documentation around food safety, temperature control
- staff personal hygiene practices
- condition of the building (including carrying out repairs)

Poor performing food businesses were most likely to say that they had implemented changes. The majority of food businesses stated they had made required changes primarily in order to improve their FHRS rating/FHIS inspection result.

Motivations to improve ratings/inspection results were driven partly by business pride, concern about losing trade and the incremental rating/inspection result structure of the schemes. In Wales there was the added impetus that display of ratings will be compulsory from November 2013 and businesses were concerned about their FHRS ratings going on public display.

Looking to the future, almost all food businesses who received an FHIS ‘Pass’ result or an FHRS rating of ‘5’ thought that it was important to their business to maintain that standard. In terms of aspirations to improve: 86% of food businesses which received an FHIS ‘Improvement Required’ result or an FHRS rating below ‘5’ felt that it was important to improve their rating/inspection result, mainly for reasons of ‘pride’.

From the qualitative fieldwork, it was evident that food business operators were striving to achieve a higher FHRS rating/FHIS inspection result as respondents were generally dissatisfied with an Improvement Required result or ratings below a ‘4’ or ‘5’ and they reported changes had been implemented as requested. Frustrations were expressed by businesses which were willing and able to introduce further improvements but which stated they had been given little or no guidance on how to achieve the highest scores. There was an unmet desire among businesses within both the FHRS and FHIS for a detailed checklist of changes needed to improve standards and secure a Pass result or a rating of 5.

From the qualitative fieldwork, there was evidence that some food businesses in England and Scotland had limited engagement with the national schemes, with
instances of respondents reporting they were not familiar with FHRS/FHIS or they were not aware of their rating/inspection result.

4.4 Display of ratings/results

The food business survey similarly identified an association between reported display of stickers/certificates and higher levels of compliance (see Table 4.2 below). At one extreme, 82% of businesses that reported a FHRS rating of 5 said that they displayed their rating sticker/certificate so that it was visible to customers from outside. By contrast, just 21% of business that reported a FHRS rating of 0-2 said they displayed their sticker/certificate externally. The same variation can be found with FHIS businesses based in Scotland. Those that reported a Pass result were more likely to state their sticker/certificate was on display externally (36%) than businesses who reported an Improvement Required inspection result (9%).

Table 4.2: Reported display of sticker/certificate by rating/inspection result

<table>
<thead>
<tr>
<th>FHRS rating^</th>
<th>Display visible from outside</th>
<th>Internal display</th>
<th>Not on display</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>82</td>
<td>14</td>
<td>4</td>
</tr>
<tr>
<td>4</td>
<td>65</td>
<td>17</td>
<td>17</td>
</tr>
<tr>
<td>3</td>
<td>45</td>
<td>20</td>
<td>35</td>
</tr>
<tr>
<td>0, 1 or 2</td>
<td>21</td>
<td>20</td>
<td>59</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>FHIS inspection result^</th>
<th>Display visible from outside</th>
<th>Internal display</th>
<th>Not on display</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pass</td>
<td>36</td>
<td>42</td>
<td>22</td>
</tr>
<tr>
<td>Improvement required</td>
<td>9</td>
<td>24</td>
<td>67</td>
</tr>
</tbody>
</table>

Adapted from Figure 3.1, IFF Research (2014) Survey of food businesses [INSERT URL].

^ Figures do not add to 100 due to rounding.

Reasons given for not displaying were: dissatisfaction with a low rating; concern it would harm the reputation of the business; not knowing the whereabouts of the sticker/certificate; because it was not a legal requirement; and considering the sticker to be not aesthetically pleasing. There was also the view that displaying a rating offered no commercial advantage because the food business relied on customer loyalty.

The food business survey provides evidence on perceptions of the effect of displaying FHRS ratings/FHIS inspection results. Views were split: 45% of respondents who said they displayed their sticker/certificate so it was visible to customers reported no impact on their business while 39% reported a positive impact. Perceived positive impacts included: a better reputation among customers; greater customer confidence; and increased volume of customers.
There was also evidence suggesting that food business proprietors were starting to engage more with the schemes and compare the competition. Half of all respondents were aware of at least some of their competitors’ ratings/inspection results while 9% said they were aware of the ratings/inspection results of all local businesses.

### 4.4.1 Mandatory display

Mandatory display of ratings/inspection results was broadly supported in the qualitative research with food businesses. But there were reservations about possible negative impacts this could have on food businesses with low FHRS ratings/Improvement Required FHIS results. It was felt that display of poor results could force business closures before these proprietors could practically implement the required changes. Food business operators suggested that they be granted a grace period to address changes and that this be followed by a re-inspection before the rating/inspection result goes public.

Food businesses were also concerned about how consumers would interpret ratings/inspection results. They felt more information on the assessment should be provided so that businesses with a FHRS rating below 3 or an Improvement Required result would not be automatically associated with a ‘dirty kitchen’ in cases where a business was downgraded due to incomplete documentation of food safety procedures.

Finally, food business operators in FHRS areas held a view that inconsistencies in the inspection regime should be addressed before display of ratings/inspection results becomes mandatory. There was also concern that if one or more food businesses specialising in a certain ethnic cuisine displays a poor result this will have negative repercussions as consumers will come to distrust all similar food businesses, even those that are broadly compliant.

### 4.5 Poor performing food businesses

The Stage 2 qualitative fieldwork included a focus on food businesses with lower FHRS ratings (0-2) and ‘Improvement Required’ FHIS results. These respondents can shed more light on the issues from their perspectives.

A prevalent theme among these businesses was a general feeling of dissatisfaction with FHRS/FHIS. Operators expressed frustration with the inspection system and unfairness about the rationale for poor ratings/inspection results. Concerns regarding perceived inconsistencies with FHRS inspections were outlined above (refer to section 4.1). Additional issues are discussed below.
Perceived lack of scheme relevance to trade

For some proprietors, there was a limited commercial case for engaging in the FHRS/FHIS due to the low public profile of the schemes. From the interviews with poor performing businesses, there was a general view that ratings/inspection results and changes made to address compliance issues had limited impact on business trade. For example, a manager of a small supermarket in England maintained that customers don’t care about hygiene ratings, rather ‘they care about the freshness of the food and what they see – whether the display counter and shelves are clean and tidy, whether the staff are clean and tidy and whether they are wearing gloves.’ Furthermore, the scheme was given low priority due to a perceived lack of relevance. For instance an owner of a fish ‘n chip takeaway located in a small town in Wales felt that the FHRS is more appropriate for higher populated areas with more passing trade as opposed to small towns which rely on local business and regular customers. His trade had built up over 20 years and he maintained customers return because of the quality of the food, not because of a hygiene rating.

Confidence in Management scoring

The confidence in management criteria in FHRS areas was a recurring issue for food business operators who viewed the requirements as an unnecessary time burden, particularly for small independent businesses with limited time and staff and for proprietors with English as a second language. Plus the emphasis on documentation of food safety procedures was felt to be an unfair representation of the ‘cleanliness’ of food preparation practices. Downgrading due to insufficient documentation of food safety systems was perceived as ‘pedantic’ and ‘paperwork driven’. It was suggested that the local authority/FSA provide support and offer alternatives for small independent businesses.

Focus on the negative

There was also the view that although operators knew the areas of weakness they were not given enough information to know what was needed to achieve a ‘5’ rating or a ‘Pass’ result. There were reports where proprietors in FHRS areas had made the requested changes connected with a low rating (0-2) and were then surprised to only receive a ‘3’ rating after re-inspection. It was unclear to these people what more was needed to achieve a ‘5’ rating.

Communications

It was felt that the relationship between food businesses and local authority officers could be more collaborative. Improved communications, consultation before changes to food hygiene requirements are made and advice between inspection visits were suggested. It was felt that a helpline offering food hygiene advice for food businesses would also be useful.
Some respondents expressed feelings of vulnerability; inspections were a source of anxiety and staff were ‘terrified’ of inspection visits. Food business operators wanted a ‘softer’ approach instead of receiving threats to close the business down.

Regarding right-to-reply safeguard measures, there were examples where operators were avoiding contact with the local authority officer because they did not wish to get the council involved any further (refer to section 4.2).

In Wales there were claims by proprietors from an ethnic minority background (and also in an area with a high concentration of poor FHRS ratings) that local authority officers were targeting them. In a weak economic climate it was felt that the local authority needs to provide more support to small independent businesses.

Frequency of inspections

It was not clear to food business proprietors what determined the schedule for inspections – i.e., why some food businesses were inspected more often than others. It was felt that FHRS/FHIS inspections should be conducted annually at a minimum in order to capture changes that occur.

Barriers to changes

Changes that involved decorating (e.g., painting, plastering) or preparation areas (e.g., shelving, sink installation) or minor changes to documentation processes were considered straightforward by the food business operators.

However, building restrictions and landlords created difficulties in carrying out structural renovations to premises. Businesses with a limited kitchen area found it difficult to make space for separating raw and cooked food preparation. Resources (cost, staff, time) were raised as a barrier to making changes, particularly for small independent businesses. There was also evidence that operators did not fully understand the changes required or what could be done to improve their hygiene rating, especially among those whose first language was not English.

4.6 Summary

Food business operators broadly supported the FHRS/FHIS, recognised the value of a uniform system for assessing food hygiene practices and were aware of their rights to appeal and to request a re-inspection. The incremental FHRS ratings gave food businesses a concrete structure to strive toward. Negative views tended to arise when an FHRS rating or FHIS inspection result was lower than expected and considered unjustified.

Reported display of stickers/certificates in a location that was publically visible was associated with ‘Pass’ or higher levels of compliance. Proprietors said that a prime reason for displaying was to communicate their food hygiene standard to customers.
Food business survey evidence highlighted widespread implementation of improvements primarily in order to achieve higher FHRS ratings or an FHIS Pass result. Motivations to improve ratings/inspection results were driven partly by business pride and concern about losing trade. There was also evidence suggesting that food business proprietors were starting to compare their ratings/inspection results with competitors. In Wales there was the added impetus that display of ratings would be compulsory from November 2013 and businesses were concerned about their FHRS ratings going on public display.

Experiences reported by poor performing food businesses helped to shed light on the FHRS/FHIS from their perspectives. Proprietors expressed frustration with the inspection system and perceived unfairness about the rationale for poor ratings/inspection results. Proprietors felt the Confidence in Management scoring category was too paperwork driven and a burden on small independent businesses; communications with local authority officers could be more collaborative and supportive as business staff felt vulnerable; more information was needed on how to achieve full compliance and about the rationale for the frequency of scheduled inspections; there were real barriers to making some changes such as costs and building regulations. Finally, there was a general view among businesses that customers are not engaged with the FHRS/FHIS and other factors like quality of food and service were more important to maintaining trade.
5 Consumer views and use of FHRS/FHIS

This chapter reports results from consumer focus groups conducted as part of the process evaluation. It sets out findings in relation to: the role of food hygiene in consumers’ food purchasing decisions; the extent to which hygiene priorities differ with eating occasion; perceptions and use of the FHRS/FHIS; and, views on how the schemes might be improved.

5.1 Role of food hygiene in food purchasing decisions

Focus group participants said they tend to rely on their own sensory information for judging standards of food hygiene when eating out, including: smell, overall appearance and feel (for example sticky floors underfoot). Visual cues were particularly important, hence respondents reported a preference for visible kitchens to enable judgements on hygiene.

People listed a variety of decision criteria when purchasing food (e.g., price, convenience, food quality and taste, atmosphere) and while food hygiene was important it was not necessarily a dominant criterion. Rather, it was the lack of cleanliness that draws attention to food hygiene issues. Otherwise, food hygiene was taken for granted as people trusted food businesses follow correct practices and assumed low hygiene standards lead to business closures. This perception was echoed in other consumer research (TNS BMRB, 2012)\(^{15}\) – basic food hygiene is expected and regulations are assumed to be sufficiently robust to detect and prohibit unsafe practices.

Food hygiene was given higher priority by those who had had a bad experience such as food poisoning and by people who described themselves as very strict about cleanliness in their home, for example. Otherwise, decisions about where to eat or purchase food were taken quickly, relying on combinations of criteria as cited above.

5.2 Use of ratings/inspection results

Focus group participants viewed FHRS/FHIS as a good idea for promoting public awareness of food hygiene outside the home. The schemes were met with enthusiasm in some instances: ‘It’s a very good thing ... such a simple idea I just sort of thought to myself when I heard it it’s a brilliant idea.’ People particularly appreciated the fact that the scheme is assessing food businesses using objective measures, in contrast to more subjective, impressionistic assessments: ‘As a

customer, you’re making your own judgement on whether a place is clean or not, on quite superficial things like does the carpet look clean.’

Consumers had not seen ‘Improvement Required’ displayed in Scotland or FHRS ratings of below 3 elsewhere. Participants in the focus groups speculated that, if FHRS ratings and FHIS inspection results were more widely displayed by food businesses, they would use them to choose among similar businesses. But other factors like price, menu options, and familiarity with the establishment would also be taken into consideration. Hypothetically, if a food business did not have a sticker/certificate visibly displayed when others did, people said they would be sceptical of its standards of food hygiene and thought the proprietor had something to hide.

5.2.1 Minimum standards

Focus group participants in FHRS areas generally considered a ‘3’ or a ‘4’ rating to be the minimum acceptable standard of food hygiene. A higher minimum rating was associated with people who described themselves as more conscious of food hygiene and who expected standards to be at least ‘good’. Those who would only accept a rating of ‘3’ or above, were deterred by ‘improvement necessary’ in the lower ratings, reasoning that if a food business was rated ‘2’ or lower, then this increased the chances of catching a food borne illness.

No one in the focus groups said they would be willing to eat at an establishment if they knew it had received a ‘zero’ FHRS rating. It was suggested that businesses with a rating of 0 or 1 should be closed down until the problems were resolved.

There was debate about whether a ‘3’ rating was good enough with respondents concluding that they needed more information about the scheme to make such a judgement. One view was that ‘3’ may be sufficient, particularly as there was a perception that factors such as paperwork or peeled painting can lower a rating and these elements were not perceived as hygiene concerns.

In Scotland, using a food business with an ‘Improvement Required’ inspection result was perceived as taking a risk. An ‘Improvement Required’ result was therefore seen as a strong deterrent: ‘It’s basically Fail by another name isn’t it?’

Minimum acceptable ratings were not rigidly adhered to, however, as people adapted their views on food hygiene and/or the potential use of the food hygiene schemes according to the eating circumstances.
5.2.2 Different eating circumstances

People identified different criteria and slightly different hygiene standards in light of different eating situations. Therefore the type of eating experience can make a difference to how and whether food hygiene information is used.

Higher standards of food hygiene were associated with expensive dining and special occasions when people want assurance of a good quality experience. Participants had higher expectations for ratings/inspection results on these occasions.

However, there was also a view that when making decisions about eating out, expectations for food hygiene (and ratings/results) should be high regardless of the type of food business or the eating occasion.

Ratings/inspection results were perceived as providing useful information when deliberating where to eat for a special occasion or when comparing unfamiliar food businesses, such as on holiday or for new business ownership. People sought out a variety of sources of information when deciding where to eat in an unknown area or when considering a new premise, including online reviews. People agreed they were more likely to judge an unfamiliar place harshly, and avoid going to it, if the food business had received a poor review or if it had a FHRS rating that was lower than their minimum acceptable standard.

FHRS/FHIS information was also recognised as valuable when scrutinising food businesses that participants associated with lower standards of hygiene (e.g., ethnic food takeaways) or where there is a perceived greater risk of illness (e.g., butchers).

Food hygiene information seemed to have less influence on people’s decisions about regular or favourite eating places because people preferred to rely on their own experiences. People were also willing to let their food hygiene standards slip in cases when they were eating out to satisfy a yen for comfort/temptation foods such as ‘greasy’ foods and ethnic cuisine. This type of eating was often mentioned in connection with alcohol consumption. Other examples of trade-offs arose in relation to convenience – when in a hurry at lunchtime the view was expressed that convenience was more important than hygiene or other factors.

The choice of eating place was also determined by the preferences of the eating party (e.g., picky children, vegetarians) but focus group participants said they would expect the same hygiene standards as they do for themselves regardless of the composition of the eating party.16

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16 The TNS BMRM (2012) research with consumers found that hygiene rating schemes would be useful when eating out with vulnerable groups such as people with health problems.
5.3 Room for improvement and clarification

A number of suggestions were made on how the scheme might be improved overall. Firstly, FHRS ratings and FHIS inspection results were viewed as a snapshot of food hygiene practice at one point in time which may or may not reflect businesses’ typical hygiene standards. A food business could be excellent most of the time and just have one bad day when the inspector arrives or vice versa with a food business making an extra effort but then allowing standards to slip. People were also sceptical about ratings that were more than one year old because they would not capture any changes made in the food business (for better or worse).

There was also the view that one size does not fit all and that there should be a different hygiene rating system for restaurants where food is served and shops such as butchers and bakers where food is taken away.

Initially, the simplicity and clear rating system of the FHIS scheme in Scotland was appreciated and the advantage of a simple ‘Pass/Fail’ [sic] certificate was acknowledged. On further discussion, however, ‘Pass’ and ‘Improvement Required’ were viewed by some as not particularly discerning. In these instances, there was agreement that the FHIS had scope for improvement in relation to the dichotomous ratings – that hygiene standards are not black and white. It was suggested that a finer scale could be used, with ‘excellent’ at the top (which very few would achieve) so there was always an incentive for food businesses to strive to improve. It was also suggested that a different word to ‘Pass’ would be preferable. One view was that a ‘Pass’ can be interpreted as though a food business has just scraped through and is not necessarily good in terms of food hygiene. Consumers in Scotland felt that wider publicity on the FHIS could help to clarify the scheme.

Focus group participants viewed the FHRS/FHIS as incomplete and a ‘token gesture’ without the public display of ratings/inspection results. People supported mandatory display as a means of holding food businesses accountable for their hygiene standards and a way of communicating hygiene standards more widely. There was also the view that hygiene information was more likely to be used if it was more visible.

To help raise public awareness consumers felt the schemes need to be advertised more widely. Other suggestions for promotion included: listing hygiene information in printed and online food reviews, coverage in television cooking programmes, inclusion in the school curriculum. It was also suggested that a public helpline be set up so that non-users of the internet could access ratings/inspection results and so that consumers could feedback on food hygiene experiences they encountered.

People requested additional information about FHRS/FHIS, in particular regarding:

- The frequency of inspections – to be valid, it was expected that food businesses would need to be inspected at least annually and more often if improvements were necessary.

- Criteria used for judging food hygiene and how FHRS ratings/ FHIS inspection results are calculated – in both stages of the process evaluation, consumers were more concerned about problems related to food handling than they were about structural issues or incomplete documentation. Therefore, before deciding whether a rating was acceptable, there was a perceived need for more information on what the ratings entailed. There was confusion about the meanings of the different FHRS ratings/ FHIS inspection results.

It was suggested that more details about the FHRS/FHIS and more information about specific food business ratings/ inspection results should be available on the FSA website. This view was also expressed in the TNS BMRB (2012) research where consumers indicated a preference for a more detailed breakdown of scores and non-conformities and access to written inspection summaries on websites.

### 5.4 Summary

In general, the focus group research found that consumers supported and welcomed the FHRS/FHIS in principle, recognising that it provides a useful, objective indication of food hygiene standards. Very few FHIS Improvement Required results or FHRS ratings of 3 and below had been encountered. As display increases, focus group participants felt they would increasingly use the schemes to choose between food businesses. It was acknowledged, however, that on most eating occasions, other decision criteria would influence their choice (particularly convenience or taste).

The priority placed on different decision criteria, including hygiene considerations, can depend on the eating occasion. Expectations for hygiene standards may be lowered, for example, when using a favoured regular eating place, following an urge for a takeaway, or when in a hurry at lunchtime. Expectations were higher for a special occasion. Hygiene information would be more useful when consumers are taking time to deliberate eating options like for a special occasion or when choosing premises in new locations such as on holiday.

On the whole the simplicity of the schemes was appreciated with a clear rating system under the FHRS and a simple Pass/ Improvement Required under the FHIS. When probed to consider minimum acceptable standards it became clear, however, that consumers were uncertain how to interpret the FHRS scores while in Scotland consumers were unclear of the implications of an Improvement Required inspection result.
In order to get more benefit from the FHRS/FHIS consumers felt that display of inspection ratings/results should be mandatory for food businesses and that wider advertising was needed to raise the profile of the schemes.
6 Theories of change

This chapter draws together the available evidence to address the question: Are the FHRS and FHIS operating as intended by the FSA? To do so, progress is tracked against the theories of change that were developed for each of the evaluation target groups – local authorities, food businesses and consumers.

6.1 Overview

The FHRS and FHIS follow from a long tradition of food safety regulation and enforcement in the UK. At the local authority level, the extent to which food hygiene inspection results have been communicated to consumers has varied tremendously. It wasn’t until January 2009 (FHIS) and November 2010 (FHRS) that a joined-up, standardised force for disseminating food hygiene information was introduced into the UK public domain.

The expectations for the schemes are far reaching – requiring the buy-in of local authorities and the retail food and catering sectors, influencing consumer food purchasing behaviour and, in the longer term, extending to the reduction of food borne illnesses.

Theories of change models were developed for the schemes in 2009-2010\(^\text{18}\) as a collaboration between the FSA and social science researchers at the Policy Studies Institute. They spell out the policy intent for behaviour change within each of the target populations – local authorities, food businesses and consumers. The overarching model is depicted in Figure 6.1 while theories of change models for each of the key groups are available in Appendix 2.

In sum, the policy intent is that consumer decisions about food purchases will take food hygiene information into account and avoid food premises with poor hygiene standards. The underlying assumption is that consumer behaviour change will drive organisational behaviour change. Organisational behaviour change in hygiene practices will in turn reduce the climate for organisms and hence the risk of food related illnesses.

The theories of change can be used as a framework for monitoring the progress of the schemes against the evaluation evidence. The remainder of this chapter takes each of the target groups in turn drawing on the FHRS/FHIS evidence to date – the process evaluation\(^\text{19}\) as well as other relevant sources.

\(^{18}\) Husain and Morris (2011) ‘An evaluation design for food hygiene rating schemes’. London: Food Standards Agency. Contact the FSA to request access to the report.

\(^{19}\) This discussion builds on the evidence previously presented in the Stage 1 FHRS/FHIS process evaluation report.
6.2 Local Authorities

The local authority theory of change for the FHRS/FHIS identifies two outcomes: i) common understanding of food hygiene scoring and ii) consistent inspection regime across all local authorities. In order to arrive at these outcomes the theory of change identifies a number of intermediate steps:

- FSA guidance on the schemes
- Training and support for local authority food safety teams to develop understanding and to establish consistency in how scores are determined
- Adequate resources for local authority operations

To date, progress with local authority buy-in to the schemes has been very positive. This is a vital step towards UK coverage. The FHRS is currently running in all areas of Wales and Northern Ireland. In England, it is expected that the scheme will be running in 99% of local authorities by the end of 2013. The FHIS is being rolled out in Scotland and all Scottish local authorities have committed to adopt the scheme.

Findings from the process evaluation fieldwork reveal a strong commitment to the FHRS/FHIS in the sampled areas. Food safety officers supported the schemes and were positive about using a standardised rating to communicate food hygiene standards.
The feedback was generally positive regarding reception to FSA guidance and training on the schemes. Food safety officers in both FHRS and FHIS areas described the guidance as useful. But food safety officers in FHRS areas repeatedly felt that the new safety controls for E. coli O157 needed to be incorporated into the ‘Brand Standard’. Training (FSA and regional/local) and other forums for support (e.g., team meetings, cross-local authority workshops, regional liaison groups) were viewed as useful for sharing practices and case scenarios. It was felt that these efforts have helped develop scoring consistency within local authority food safety teams. For this reason FSOs considered it necessary that these supports be sustained.

The evidence also suggests that limited local authority resources are restricting FHRS/ FHIS operations. Staff shortages were regularly identified as a reason why not all food businesses within scope of the schemes had received an inspection. Likewise, those food safety teams that lacked administrative support found the paperwork associated with the FHRS/FHIS to be a burden.

However, a key weakness to date is the perceived inconsistency between local authorities regarding the scoring of FHRS ratings. This was also an issue echoed by food businesses that were interviewed for the study.

6.3 Food Businesses

Food businesses are identified as key agents for change; serving as both the intermediaries for programme delivery to the public and as a source of food borne pathogen risk. Food businesses directly interact with local authorities and consumers. The theory of change for food businesses is based on the premise that customers are more likely to use food businesses with higher FHRS ratings or FHIS Pass results. In order to maintain trade, food businesses will respond by improving their hygiene standards, particularly in areas where they are competing with similar businesses. The theory assumes the following elements are needed to achieve the goal of reducing food borne illnesses:

- Awareness and understanding of FHRS/FHIS
- Perceptions of consumer engagement with the scheme – food businesses believe that consumers are using the scheme
- Behaviour change – food businesses are willing and able to improve and maintain hygiene standards so that they can achieve higher FHRS ratings/ FHIS Pass results
- Voluntary display – food businesses with higher ratings/results display stickers/certificates because they believe that this attracts customers, while businesses

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20 This finding was not evident in FHIS areas.
with low ratings/ Improvement Required results may not display but worry that not doing so deters customers

- Competition – food businesses which face competition from nearby businesses are particularly likely to try to achieve higher ratings/ inspection results and to display them

The evidence to date indicates that although inroads have been made (to varying degrees) on all the above behaviours, there is still much more change required among food businesses. Each element of the food business theory of change is discussed below.

6.3.1 Awareness and understanding

Cross-sectional survey studies show that food business awareness of the FHRS is reasonably high (GfK Social Research, 2013).21 Over 90% of food businesses surveyed in FHRS areas reported they were aware of the scheme and this remained about the same between 2011 and 2013.

Awareness of the FHIS in Scotland was lower at 62%, based on a 2012 survey of food businesses (GfK Social Research, 2012).22

Awareness was higher in Wales and Northern Ireland where there have been national campaigns to promote the FHRS. Additionally, in the process evaluation fieldwork there was an indication that some operators in England and Scotland were not fully aware of the scheme.

Evidence from the process evaluation qualitative fieldwork identified a gap in understanding among food businesses that were not fully compliant with food hygiene law. A recurrent issue among these proprietors was not understanding what additional changes were needed in order to achieve a ‘5’ rating or a ‘Pass’ result.

6.3.2 Perceptions of consumer engagement

There was a general view among food business operators that their customers are not aware of the FHRS/FHIS or, if they are aware, they consider other factors like food quality and price, more important than food hygiene information. For this reason, proprietors placed less value on FHRS/FHIS when considering their business trade. Consumer awareness is discussed further in section 6.4.


22 The report, ‘Food Hygiene Rating Scheme (FHRS) and Food Hygiene Information Scheme (FHIS) – Display of ratings and inspection results in England, Northern Ireland and Scotland’ is available at: http://www.foodbase.org.uk/results.php?f_category_id=&f_report_id=758
6.3.3 Improvements in compliance

In the process evaluation, local authority officers in all FHRS countries perceived positive changes in the compliance of food businesses and felt this was driven in part by the scheme.\textsuperscript{23} Similarly, surveyed food businesses in all countries reported they had implemented the requested changes and indicated they intended to maintain these improvements and strive towards higher ratings/inspection results.\textsuperscript{24}

Overall the annual local authority monitoring returns show improvements in business compliance with food hygiene law. However, this information needs to be treated with caution as trend statistics cannot identify whether or not the changes are directly attributable to the FHRS/FHIS. Positive changes in compliance rates are occurring across local authorities, including those that have not adopted the schemes. A rigorous impact analysis on FHRS/FHIS that is due to report in 2014 will help shed light on how much this can be attributed to the schemes.

6.3.4 Display of ratings/inspection results

As noted in section 4.4, display of stickers/certificates is associated with the outcome of the FHRS/FHIS inspection, with higher rates of display reported among food businesses with a 4/5 rating or Pass inspection result. A similar trend was found in a recent GfK audit of display in FHRS areas.\textsuperscript{25} As shown in Table 6.1, in the three FHRS countries, display of a sticker/certificate in a place visible to customers was highest among food businesses with a 4/5 rating (about 66%), compared to those with a rating of 3 (about 25%) or a rating of 0, 1 or 2 (about 10%). Overall, around half of food businesses were displaying their rating at the time of the 2013 audit – 52% in England, 47% in Wales and 57% in Northern Ireland (data not shown). The GfK audit found, over time, there has been a significant increase in the rate of voluntary display in each of the FHRS countries.

\textsuperscript{23} Local authority officers in Scotland were less positive about improvements to date. This was mainly attributed to the low profile of the scheme.

\textsuperscript{24} Evidence from elsewhere shows positive signs of improvement. Recent research conducted for the Chartered Institute of Environmental Health (CIEH) reported significant improvements in FHRS ratings in Wales. Ratings for 255 food businesses were tracked between October 2012 and April 2013. 40% had improved their rating during this time and the number of businesses with a higher (4-5) rating increased from 8% to 26%. Available at: \url{http://www.cieh.org/WorkArea/showcontent.aspx?id=46936}

Table 6.1: Audited display of FHRS stickers/certificates

<table>
<thead>
<tr>
<th>FHRS rating</th>
<th>England %</th>
<th>Wales %</th>
<th>Northern Ireland %</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 or 5</td>
<td>64</td>
<td>66</td>
<td>67</td>
</tr>
<tr>
<td>3</td>
<td>28</td>
<td>22</td>
<td>24</td>
</tr>
<tr>
<td>0, 1 or 2</td>
<td>10</td>
<td>17</td>
<td>13</td>
</tr>
</tbody>
</table>

Adapted from Chart 3.1, GfK 2013 audit of display [http://www.food.gov.uk/multimedia/pdfs/fhrs-display-research-report.pdf](http://www.food.gov.uk/multimedia/pdfs/fhrs-display-research-report.pdf)

### 6.3.5 Competition

There was some indication in the process evaluation findings that business operators are consciously aware and are comparing ratings/inspection results of other businesses, both in the local area and of businesses whom they would consider to be competitors (refer to section 4.4).

### 6.4 Consumers

Change in consumer behaviour is arguably the biggest challenge for the FHRS/FHIS. The theory for change assumes consumers will take into account food hygiene standards when they decide where to purchase their food. There are three parts to the theory:

- **Awareness of FHRS/FHIS**
- **Understanding of the scheme**
- **Behaviour change** – consumers check food business ratings/inspection results (stickers, certificates or online) and are more likely to use food businesses with higher ratings/results

Although there are small indications of positive change since the introduction of the FHRS/FHIS, it appears that more needs to be done to prompt consumers into using food hygiene information. Slower progress in reaching the public is understandable because, as the end users of the schemes, the other elements and events identified in the theory of change need to be set in place first.

#### 6.4.1 Awareness and understanding

In the process evaluation, there was a recognised need to improve consumer awareness of the FHRS/FHIS in all countries and this was reported by all stakeholder groups. Building the public profile of the schemes through local advertising and other activities was not considered sufficient. As reported in section
5.3, understanding of the FHRS/FHIS was muddied by the need for clarification. In the focus groups people requested additional information regarding inspection processes and the composition of ratings/inspection results in order to better understand the schemes.

On a more positive note, results from the FSA Biannual Tracker Survey\(^\text{26}\) indicate that awareness of the FHRS has grown since it was first launched in November 2011. In May 2013, 34% of respondents reported that they had seen or heard about the FHRS, up 13% from November 2011 (refer to Table 6.2). Public awareness of the schemes was higher in Wales (49%) and Northern Ireland (41%) where there have been national advertising campaigns compared to England (33%). Less positively, in Scotland, awareness of the FHIS has remained constant over the same period, at about 11%.

<table>
<thead>
<tr>
<th>Scheme awareness</th>
<th>Seen sticker/certificate</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>May13 %</td>
</tr>
<tr>
<td>FHRS</td>
<td>34</td>
</tr>
<tr>
<td>FHIS</td>
<td>11</td>
</tr>
</tbody>
</table>

Adapted from Figure 13 Tracker Survey Wave 6
* Statistically significant difference to the previous wave of research

Awareness of FHRS and FHIS stickers/certificates was also gauged through the Tracker Survey with a new question introduced in November 2012 (respondents were shown stickers and certificates and asked if they had seen them). Reports that people had seen FHRS stickers/ certificates significantly increased between November 2012 and May 2013 – up from 50% to 57% (refer to Table 6.2). In 2013, awareness of stickers/ certificates was highest in Northern Ireland (84%), followed by Wales (70%) and England (56%). In Scotland awareness of FHIS stickers or certificates over the same period increased from 32% to 45%.

### 6.4.2 Public use

To date, there is no data available to indicate the extent to which those members of the public who say they are aware of the FHRS/FHIS actually use it. Given findings from the process evaluation, it may be assumed that awareness (and understanding) do not necessarily lead to application of the schemes. The research suggests that,
even among those who say they have used hygiene information when purchasing food, they do not always refer to this information. Rather, the circumstances of the eating occasion will influence use and people are more likely to refer to hygiene information when taking care to deliberate over eating decisions, such as for special occasions and unfamiliar places (on holiday or newly opened premises).  

Access to food hygiene information in order to avoid food businesses with poor hygiene standards was also an issue. As indicated in the 2013 audit of FHRS display, the vast majority of food businesses with a 0, 1, or 2 rating did not display a sticker or certificate. Moreover, given that the overall rate of FHRS display is about 50%, consumers may not be led to believe that a missing sticker/certificate is an indication of poor hygiene.

6.5 Summary

Theories of change models for FHRS/FHIS spell out the policy intent for behaviour change within each of the target populations – local authorities, food businesses and consumers. The expectations for the schemes are far reaching – requiring the buy-in of local authorities and the retail food industry, influencing consumer food purchasing behaviour and, in the longer term, extending to the reduction of food borne illnesses. The models were used to track progress to date. This is outlined in Table 6.3.

The data suggest that more needs to be done to encourage food businesses to display their ratings/inspection results and to prompt consumers into using food hygiene information. Once customer use of the schemes is on the increase then it is more likely that food businesses will sense pressure to improve their hygiene standards.

Slower progress in reaching the public is understandable because, as the end users of the schemes, the other elements and events identified in the theories of change need to be set in place first.

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27 These findings are supported by consumer insight research carried out in 2012 which indicated that people are more likely to rely on extra information when eating in an unfamiliar location, eating with vulnerable people (e.g., people with food allergies) and on special occasions. TNS BMRB (2012) Citizens Forum: Expanding Food Hygiene Information. Available at: http://www.food.gov.uk/multimedia/pdfs/citizens-forum-report-2012

Table 6.3: Tracking progress against the theories of change

<table>
<thead>
<tr>
<th>Positive progress</th>
<th>Weak progress</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Local authorities</strong></td>
<td></td>
</tr>
<tr>
<td>o Scheme take-up &amp; commitment</td>
<td>o Consistency in scoring FHRS ratings</td>
</tr>
<tr>
<td>o Guidance</td>
<td>o Resourcing</td>
</tr>
<tr>
<td>o Forums for development &amp; support</td>
<td></td>
</tr>
<tr>
<td><strong>Food businesses</strong></td>
<td></td>
</tr>
<tr>
<td>o Awareness increasing</td>
<td>o Awareness lags in Scotland</td>
</tr>
<tr>
<td>o Perceived increased compliance*</td>
<td>o Display of ratings/results lower than expected by local authorities</td>
</tr>
<tr>
<td>o Perceived increased display of ratings/results</td>
<td>o Public awareness perceived to be low</td>
</tr>
<tr>
<td>o Competition – comparing ratings/results</td>
<td></td>
</tr>
<tr>
<td><strong>Consumers</strong></td>
<td></td>
</tr>
<tr>
<td>o Awareness increasing</td>
<td>o Awareness lags in Scotland</td>
</tr>
<tr>
<td>o Insights on potential use</td>
<td></td>
</tr>
<tr>
<td></td>
<td>o Further clarification to enhance understanding</td>
</tr>
<tr>
<td></td>
<td>o Access to food hygiene information limited by rates of display</td>
</tr>
<tr>
<td></td>
<td>o Use of the schemes in decisions about food purchases</td>
</tr>
</tbody>
</table>

* This evidence needs to be treated with caution as trend statistics cannot identify whether or not the changes are attributable to the FHRS/FHIS.
7 Conclusions and recommendations

The process evaluation of the FHRS/FHIS covered implementation, operations and perceived impacts from the perspectives of food safety officers and food business operators in selected local authorities across the UK. The experiences and views of consumers were also collected. The process evaluation is not intended to be representative of all FHRS/FHIS activities. Therefore, the degree to which certain events were occurring or the extent of certain held views cannot be estimated. Rather, the findings can provide valuable insights into programme operations on the ground and the ways in which the schemes are being perceived and experienced.

This chapter sums up future challenges and conclusions from the 2 year study and provides recommendations following from the evidence.

7.1 Future challenges

The process evaluation has identified some key challenges relating to the perceived reliability of the schemes; concerns associated with mandatory display of food hygiene information; challenges associated with poor performing food businesses, competition over ratings/inspection results, and consumer use of the schemes.

7.1.1 Scheme reliability

The FHRS and FHIS are being implemented across different local authorities and across a range of food businesses. This opens up the possibility for different interpretations as the schemes are applied and adapted to the local setting. The process evaluation raised several concerns about scheme operations that threaten the perceived reliability, and ultimately the validity, of the schemes. Perceived reliability (that ratings/results are assessed consistently and that they accurately reflect food hygiene standards) is integral to maintaining stakeholder trust in the FHRS/FHIS so these areas warrant further attention:

- Although local authority officers were confident they were achieving consistent scoring of FHRS/FHIS results within food safety teams, officers in England and Wales identified inconsistencies when comparing FHRS scoring across local authorities.
- Based on their experiences, food business operators in FHRS areas observed that both the focus of an inspection and the rating can vary according to the local authority officer. It was also noted that the timing of inspections can influence a rating, for instance, those carried out during peak and off-peak periods.
The appropriateness of applying a single scheme across a range of food businesses was brought into question in both FHRS and FHIS areas. Food business operators felt that a single grading system did not take into account the effort put in by some food establishments (for example those that cook from fresh ingredients versus frozen prepared meals) and this did not seem fair to them. For consumers, applying one set of standards to different types of food business did not seem intuitively correct.

Finally, consumers and food business operators observed variations in the frequency of inspections. It was unclear what determined how often different food businesses were inspected. Consumers questioned the validity of ratings/inspection results that were based on an inspection that was more than a year old.

7.1.2 Mandatory display of ratings/ results

Consumers can access information about the food hygiene standards of individual food businesses through two routes: electronically and through stickers/certificates that are on display. The evaluation findings suggest that low rates of display are likely to be restricting public access to food hygiene information – according to the 2013 GfK audit of display, around half of food businesses in FHRS areas were not displaying their rating. If voluntary display is not working, then it seems feasible to conclude that more effort needs to be devoted to encouraging display. Making display mandatory is one possibility.

Both stages of the process evaluation found strong support among local authorities and consumers for making the display of ratings/inspection results compulsory. Local authority officers believed this would put more pressure on food businesses to engage in the schemes while increased visibility of stickers and certificates would help lift the public profile of the schemes. People in the focus group research viewed the FHRS/FHIS as incomplete without the public display of ratings/inspection results. Mandatory display was broadly supported in the qualitative research with food businesses. However, reservations were expressed among both better and poorer performing food businesses about anticipated negative impacts this could have on establishments with low FHRS ratings/Improvement Required FHIS results.

Wales will provide a case example following the November 2013 legislation to make display of FHRS ratings in food businesses a legal requirement. An early indication from the process evaluation in Wales suggests that the volume of requests for re-

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29 The evaluation did not gauge public access to electronic information (through the internet or smartphone). This is an area for future research.
inspections/ re-visits for the purpose of re-rating have added to workloads and local authority officers expected these formal requests to increase.

In addition to a potential strain on the workloads of food safety teams, the process evaluation identified other practical challenges for the implementation and monitoring of mandatory display in food businesses:

- Food safety officers raised concerns that mandatory display could adversely affect relationships with food businesses as inspection visits may become ‘confrontational’ with poorer performing businesses. Local authority officers also questioned how and by whom display of ratings/results would be monitored.

- Food business operators in FHRS areas maintained that perceived inconsistencies in the inspection regime should be addressed before display of ratings/ inspection results becomes mandatory.

- While the display of low ratings/ Improvement Required results is intended to place extra pressure on these businesses to improve food hygiene, the concern was voiced among both better and poorer performing food businesses that display could force business closures before these proprietors can practically implement the required changes. They added that this could ultimately harm the local economy.

7.1.3 Poor performing food businesses

Local authority food safety officers identified a core group of poor performing food business operators (FHRS ratings below 3 or FHRS Improvement Required results) with whom they found it difficult to encourage positive changes. One aim of the Stage 2 research was to gain insights on the attitudes and experiences of these businesses. As outlined in Chapter 4, proprietors expressed frustration with the inspection system and perceived unfairness about the rationale for poor ratings/ inspection results. The findings identify areas to clarify and address in future work with poor performing food businesses. It should be noted that although these findings are issue driven, in the research these proprietors broadly supported the FHRS/FHIS and the majority reported they were making the requested changes.

- The Confidence in Management scoring category was considered to be too paperwork driven and a burden on small, independent businesses.

- It was felt that communications with local authority officers could be more collaborative and supportive. A reason why food business operators did not exercise their rights to appeal or request a revisit was that staff felt vulnerable.

- Proprietors requested more information about how to achieve full compliance.
- There were real barriers to making some changes such as costs and constraints of building space.

Finally, from the evaluation evidence it seems that proprietors with poor English proficiency (reading, writing, speaking) are at a disadvantage. Local authority officers need to take this into account when communicating with these individuals.

### 7.1.4 Food business competition

One of the elements in the FHRS/FHIS theory of change is that food businesses will use their ratings/inspection results as a basis for competition which will in turn drive up hygiene standards. The evaluation found some indication that food businesses were comparing the competition – half of surveyed business operators said they were aware of at least some of their competitor’s ratings/results while 9% said they were aware of ratings/results for all local businesses. It would seem that this finding could be developed further to test if and how knowledge of other business’s ratings/inspection results serves as a mechanism for change.

### 7.1.5 Consumer engagement

Consumer engagement (awareness and use) in the FHRS/FHIS was identified as an issue in the evaluation. All stakeholders viewed public awareness to be low. Crucially, there was a view among food business operators that food hygiene information was not a high priority among their regular customers and in these cases there was not a sense of public pressure to drive up standards of hygiene. This is an area for improvement as it is important that food businesses perceive their customers are noticing food hygiene information.

As discussed in Chapter 6, there is a knowledge gap about the dynamics of use of food hygiene information. Even if consumer awareness of FHRS/FHIS was higher, it cannot be assumed that this will lead to greater use. To help move the schemes forward, more work needs to be done to identify and assess strategies to encourage the use of hygiene information in food purchasing decisions. Insights from the research suggest that introducing the information into contexts where people already turn to for reviews on food premises, like online reviews, could be one approach worth pursuing.

On a related issue, consumers have expressed interest in receiving more details about the scoring and performance of individual food business to help explain ratings/inspection results. If this information is made available then further work is required to help consumers interpret and apply it appropriately.
7.2 Conclusions

The FHRS and FHIS were designed to provide consumers with food hygiene information that can be used when making decisions about food purchases. In order to achieve an ultimate goal of reducing food borne illnesses, the policy intent is for changes to occur among local authorities, food businesses and consumers.

Evidence from the process evaluation suggests that positive progress has been made in gaining buy-in from local authorities to incorporate the FHRS/FHIS into their inspection programmes. Since the introduction of the schemes, positive changes in food hygiene standards have been noted by local authorities, although conclusions about the extent to which these changes are attributable to the schemes cannot be judged until an impact evaluation has been completed. Consumer awareness of the FHRS/FHIS has also increased over the life of the schemes.

The schemes are operated by local authorities in partnership with the FSA but the process evaluation has highlighted the crucial role food businesses play in delivery. There seem to be some critical challenges that need to be addressed in order to strengthen the operation, delivery and use of the FHRS/FHIS. More progress is needed to engage consumers and poor performing food businesses in the schemes.

7.3 Recommendations

Based on the evidence, the following recommendations are put forward for the FSA and local authorities to address:

- **Continue support to local authority food safety teams** with on-going training in all countries and cross-local authority forums to address inconsistencies in scoring FHRS ratings.

- **To enhance food business engagement in the schemes, nurture a collaborative relationship between local authorities and food businesses:**
  - Work with food business operators to identify effective modes of communication.
  - Inform food businesses operators about changes in food hygiene requirements that may affect FHRS ratings/ FHIS inspection results.
  - Towards the goal of improving hygiene standards, encourage operators to initiate contact for clarification and advice.
  - To improve the synergy between ratings/results and food hygiene standards, explore ways to encourage operators to request a re-inspection after changes have been addressed.

- **Ensure local authorities provide food businesses with full information on how to comply with food hygiene law in a comprehensible format** (e.g.,
avoiding technical jargon and use of other modes of communication to overcome language barriers).

- **Explore options to address concerns about documentation of food safety systems**, particularly for small businesses and those with English language limitations.

- **Investigate how competition over ratings/inspection results can be encouraged among food businesses.** To date there has been little information on how competition acts as a mechanism for improving food hygiene standards.

- **Encourage the display of FHRS ratings/FHIS inspection results more vigorously** among food business operators. Mandatory display, which was highly endorsed by local authorities and consumers, is one approach that should be considered. Learning from the experience in Wales will help to refine this strategy.

- **Make food hygiene information more accessible to consumers** by promoting the FSA ratings website and smartphone app more widely. Consider partnering with existing resources that provide information on eating out, like online food reviews.

- **Consider providing more details on the composition of ratings/inspection results** to make the system more transparent. Further research is warranted to test how this information might be interpreted and used by consumers.

- **Raise the public profile of the schemes** through further national communication activities, in tandem with local promotion of the FHRS/FHIS.

- **Given the above activities, continue to monitor and address resourcing of local authority food safety teams** to ensure there are sufficient staff for FHRS/FHIS inspections, scheme administration and promotion, and for tailored communications with individual food businesses.
References


Appendix 1: About the FHRS and FHIS

Food Hygiene Rating Scheme (FHRS)

The scheme

- The FHRS, which is for England, Wales and Northern Ireland (a scheme with similar aims is being rolled out in Scotland), is a local authority/FSA partnership initiative.
- It provides consumers with information about hygiene standards in food premises at the time they are inspected to check compliance with legal requirements – the rating given reflects the inspection findings.
- It allows consumers to make informed choices about where to eat out or shop for food and, through the power of these choices, encourages businesses to improve hygiene standards.
- The overarching aim is to reduce the incidence of foodborne illness (1 million cases annually with 20,000 hospitalisations and 500 deaths) and the associated costs to the economy (£1.5 billion annually).
- Restaurants, takeaways, cafés, sandwich shops, pubs, hotels, hospitals, schools and other places people eat away from home, as well as supermarkets and other retail outlets, are given hygiene ratings as part of the scheme.
- The FHRS is based around the local authority’s planned food hygiene intervention programme so does not require additional inspections.
- There are six hygiene ratings on a simple numerical scale ranging from ‘0’ (urgent improvement necessary) at the bottom to ‘5’ (very good) at the top.
- Consumers can access ratings at food.gov.uk/ratings and businesses will be encouraged to display stickers and certificates showing their rating at their premises.

The inspection

- At inspection, the food safety officer checks how well the business is meeting the law on food hygiene. Three areas are assessed. These are:
  - how hygienically the food is handled – how it is prepared, cooked, cooled, stored, and what measures are taken to prevent food being contaminated with bacteria
  - the condition of the structure of the premises including cleanliness, layout, lighting, ventilation, equipment and other facilities
- how the business manages and records what it does to make sure food is safe using a system like Safer food, better business

- A numerical value is assigned for each area – see below. Food safety officers use guidance to determine how to score each of these areas.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>How hygienically the food is handled</td>
<td>0 5 10 15 20 25</td>
</tr>
<tr>
<td>Condition of structure</td>
<td>0 5 10 15 20 25</td>
</tr>
<tr>
<td>How the business manages and documents food safety</td>
<td>0 5 10 20 30</td>
</tr>
<tr>
<td><strong>Total score</strong></td>
<td>80</td>
</tr>
<tr>
<td><strong>Level of compliance</strong></td>
<td>High  Low</td>
</tr>
</tbody>
</table>

**The food hygiene rating**

- The rating given depends on how well the business does overall – the total score.
- It also depends on the area(s) that need improving the most - the business may do better in some areas and less well in others.
- To get the top rating, the business must score no more than 5 in each of the three areas.
- All businesses should be able to get the top rating.
- A new rating is given at each planned inspection.

<table>
<thead>
<tr>
<th>Total score</th>
<th>0 – 15</th>
<th>20</th>
<th>25 – 30</th>
<th>35 – 40</th>
<th>45 – 50</th>
<th>&gt; 50</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highest permitted individual score</td>
<td>5 10 10 15 20 -</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Rating</th>
<th>VERY GOOD</th>
<th>GOOD</th>
<th>GENERALLY SATISFACTORY</th>
<th>IMPROVEMENT RECOMMENDED</th>
<th>SIGNIFICANT IMPROVEMENT REQUIRED</th>
<th>REPEAT INSPECTION RECOMMENDED</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
<td>6</td>
</tr>
</tbody>
</table>

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Food Hygiene Information Scheme (FHIS)

The scheme

The Food Hygiene Information Scheme (FHIS) is run in Scotland. The FHIS has similar aims to the Food Hygiene Ratings Scheme (FHRS) run in other parts of the UK. Like the FHRS the FHIS is a means of providing information to consumers about the standards of hygiene in food businesses at point of sale and on the web. The demand for such a scheme was first recognised in Scotland by Consumer Focus Scotland in its paper 'Food Law Enforcement – A Study of the Views of Environmental Health and Food Safety Officers in Scotland' (February 2004) and seen as an important mechanism for informing consumer choice.

FHIS was established as a pilot project which ran from November 2006 to November 2008, in partnership with five volunteer Local Authorities. In December 2008 the Food Standards Agency Board recommended continuation of the FHIS as the appropriate format for a national scheme in Scotland. This recommendation acknowledged the prevailing views of stakeholders in Scotland received during the public consultation process.

The scheme was overseen during the pilot by a Steering Group that incorporated consumer, industry and enforcement representation. The Steering Group still oversee the scheme today.

Assessment

The FHIS assessment is also based on compliance with the European Community Regulations on food hygiene. In this case, the scoring system is not wholly dependent on the Food Law Codes of Practice. The general direction and guidance given to local authorities is followed in assessing compliance against the
requirements of the Regulations on food hygiene but there is no direct dependency on the 'food hygiene interventions-rating scheme' set out in the Codes.

Assessment is made against all aspects of the Regulations including hygiene practices, the structure of the establishment, equipment and implementation of food safety management systems - i.e. current compliance level. The initial score may be given only following a full inspection (as defined in the Food Law Codes of Practice).

The scheme is designed around the definition of a ‘Pass’ and this represents 'satisfactory compliance' with the Regulations on food hygiene, with any non-compliances being minor in nature only, not recurring and not critical to food safety. Any business that does not meet the 'Pass' standard falls into the 'Improvement Required' category - the local authority will (in line with the Food Law Codes of Practice) communicate in writing, the nature of each non-compliance and the necessary remedial action. In this way, every business that does not meet the ‘Pass’ standard will be clear about the steps required to achieve this.

Minor non-compliances that are not critical to food safety are differentiated from more significant non-compliances. Such minor non-compliances should not affect consumer safety but are legal requirements and notified to the business with the normal expectation that they will be rectified as a matter of course without the need for a re-inspection. However, if such minor non-compliances are found to have not been rectified as expected, at a subsequent inspection then the business will not be assessed as a 'pass'.
Appendix 2: Theories of Change

During 2009-2010 a feasibility study set out programme theories of change for food hygiene rating schemes. This study identified an overarching theory of change as well as underlying theories of change for the key target groups: local authorities; food businesses and consumers. These are reproduced in Figures A2.1 through A2.4 below.

Requests to access the feasibility study that set out the programme theories of change can be made to the FSA.

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Figure A2.1: The overarching programme Theory of Change
Figure A2.2: The Theory of Change - Local Authorities
Figure A2.3: The Theory of Change – Food Businesses
Figure A2.4: The Theory of Change - Consumers

[Diagram showing the flow of information and actions related to food hygiene rating and consumer decision making.]

- Food Standards Agency
- Local Authority
- National scheme website
- Consumer
- Food Businesses
- Marketing and communication activities
- Increased awareness of food hygiene
- Rating stickers/certificates
- Accesses website
- Looks for rating stickers/certificates
- Understands rating system
- Compares hygiene rating of food businesses
- Chooses food business with higher hygiene rating
- Fewer reported cases of food borne illness
Appendix 3: Methodology

A3.1 Overview

The full evaluation of the FHRS/FHIS consists of a process study (the focus of this report), an assessment of impacts and a synthesis of the full evaluation (both due to report in 2014).

The process evaluation took a systematic approach to collecting and analysing feedback on the national schemes, deploying both quantitative and qualitative social science techniques. It consisted of two stages:

- Stage 1 – early implementation study (October 2011 to February 2012)
- Stage 2 – established operations (February to June 2013)

Summary of Stage 1 methods

Stage 1 of the process evaluation focused on early implementation and delivery of the FHRS/FHIS. The research consisted of:

- Telephone interviews with FSA FHRS/FHIS policy officials in each country
- Telephone interviews with local authority food safety officers
- Secondary analysis of survey data on consumer food hygiene related behaviour
- Site visits to observe and interview food business operators in 6 local authorities in England (3), Wales (1), Northern Ireland (1) and Scotland (1)
- 12 consumer focus groups, 2 in each of the 6 selected local authorities

The research followed a case study approach within 6 sampled local authorities in order to report feedback about the FHRS/FHIS from the different stakeholder perspectives. Full details of the Stage 1 methods are in a published report available on the FSA website.31

A3.2 Stage 2 Methods

Stage 2 of the process evaluation focused on established operations, delivery of the FHRS/FHIS and perceived impacts. The research consisted of:

- Telephone interviews with food safety officers
- Consumer focus groups
- Survey of food businesses
- Site visits and interviews with food business operators

http://www.food.gov.uk/science/research/ssres/foodsafetyss/fs244011/#anchor_3
Details on the sampling procedures and the separate strands of fieldwork follow. Fieldwork instruments are available in Appendix 4.

**Sampling**

Sampling followed a two-stage process: i) selection of local authorities for research on national scheme operations, and ii) selection of local authorities for case studies.

**Phase 1 local authority sample**

Initially, 30 UK local authorities were selected for fieldwork with food safety officers about the operations of the established schemes. At the time of the fieldwork, all these local authorities had been operating the FHRS or FHIS for a minimum of 12 months, but most had been operating the scheme for 18 to 24 months. Variation was sought on geographic, demographic and scheme related criteria which included:

- Type of national scheme
- Country – 15 in England and five in each of Wales, Northern Ireland and Scotland
- Geographic spread within each country
- Urban and rural locations
- Relatively high proportions of 0-2 rated / Improvement Required businesses. A focus of the Stage 2 research was to better understand the attitudes and motivations of higher risk and poorer performing food businesses in regards to food hygiene standards. Higher concentrations would improve the chances of reaching these businesses for fieldwork.
- The 6 local authorities that served at Stage 1 case studies were included for longitudinal follow-up in food safety team fieldwork

In order to reduce research burden, local authorities that had participated in recent FSA related research or where staff were undergoing change (such as restructuring) were excluded from the sample.

Characteristics of the phase 1 local authority sample are provided in Table A3.1.

**Phase 2 case study sample**

Eight local authorities were selected for case study. This phase of the research covered six FHRS areas (two local authorities in each of England, Wales and Northern Ireland) and two FHIS areas in Scotland. The case study research comprised:

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32 Based on a December 2012 data capture of the distribution of national scheme ratings/results, a percentage 0-2/Improvement Required was calculated for each participating local authority. Within each country, local authorities were ranked on this tally and those with a higher percentage were prioritised, balanced with the other selection criteria.
• Focus groups with consumers

• A telephone survey of food businesses within scope of the national food hygiene inspection schemes

• Site visits and qualitative interviews with food business operators

The 30 local authorities served as the sample frame for selecting case study areas. Sample criteria were agreed with the FSA in advance.

Two of the six Stage 1 case study areas were selected. This was based on:

• The high proportion of lower rated / Improvement Required food businesses in the area

• England1 area was selected because it comprises a wide variety of food choices, reflecting the area’s multi-ethnic population

• The inclusion of Scotland1 also ensured a longitudinal case study perspective on the Food Hygiene Information Scheme as well as the Food Hygiene Rating Scheme.

The final sample of local authorities aimed to achieve variation and to balance the range of characteristics across the UK and as much as possible within countries:

• Two Stage 1 case study areas – for longitudinal follow-up

• Two local authorities in each country – in order to capture national scheme developments unique to England, Wales, Northern Ireland and Scotland

• Geographical distribution within countries, with three of the eight cases located in rural areas

• A range of population demographics

• Within each country local authorities with relatively high concentrations of food businesses assigned a 0-2 rating or Improvement Required

• A mix of LAs with and without a previous local hygiene rating scheme

• Variation on the approach to which the local authority implemented the scheme

In Table A3.1, local authorities selected for case study fieldwork are highlighted in grey. The six Stage 1 case study areas are identified in italics.

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33 As part of the longitudinal research design, consumer focus groups were also carried out in the four local authorities which served as case studies in Stage 1 of the evaluation process study.
### Table A3.1: Stage 2 local authorities by sample characteristics

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Geography</th>
<th>Pop’n</th>
<th>% BME</th>
<th>% Unemployment</th>
<th>% Deprivation</th>
<th>% 0-2 / IR</th>
<th>Approach</th>
<th>All FBs assessed</th>
<th>Start date</th>
<th>Previous scheme</th>
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<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<td>14.1</td>
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<td>10</td>
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<td>Dec 2010</td>
<td>Y</td>
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<td>Y</td>
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<tr>
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<td>6</td>
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<td>Apr 2011</td>
<td>N</td>
</tr>
<tr>
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<tr>
<td><strong>Wales</strong></td>
<td></td>
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<td>1.811m</td>
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<td>10</td>
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<td>Jun 2011</td>
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<td><strong>Scotland</strong></td>
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<td>Y</td>
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<td>Local Authority</td>
<td>Geography</td>
<td>Pop’n</td>
<td>% BME</td>
<td>% Unemployment</td>
<td>% Deprivation</td>
<td>% 0-2 / IR</td>
<td>Approach</td>
<td>All FBs assessed</td>
<td>Start date</td>
<td>Previous scheme</td>
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<tr>
<td>-----------------</td>
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<td>------------</td>
<td>----------</td>
<td>------------------</td>
<td>------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Scotland4</td>
<td>Mixed</td>
<td>80,300</td>
<td>0.1</td>
<td>11.6</td>
<td>40</td>
<td>23</td>
<td>Critical Mass</td>
<td>Y</td>
<td>Dec 2010</td>
<td>N</td>
</tr>
<tr>
<td>Scotland5</td>
<td>Mixed</td>
<td>85,900</td>
<td>1.5</td>
<td>7.0</td>
<td>6</td>
<td>14</td>
<td>Critical Mass</td>
<td>Y</td>
<td>Apr 2011</td>
<td>N</td>
</tr>
</tbody>
</table>

Notes:
Geography based on separate country classifications.
Population and percentage Black and Minority Ethnic (BME) based on 2011 census statistics.
Unemployment rate from 2011 Labour Force Survey (LFS) and based on the International Labour Organisation (ILO) definition of out of work and actively seeking work. Due to small numbers, LFS unemployment estimates for Northern Ireland had been aggregated to the regional level.
Deprivation based on Indices of Multiple Deprivation summary percentages for each country from most recent data: England (2010), Wales (2011), Scotland (2012) and Northern Ireland (2010).
All FBs assessed indicates whether all food businesses within scope have received a FHRS/FHIS result, as reported in telephone interviews with EOs. In all cases where incomplete, only low risk businesses had not received an inspection result.
A3.3 Stage 2 fieldwork

Interviews with food safety officers

A telephone interview was conducted with a food safety officer in a management role in each of the 30 local authorities in the phase 1 sample. Prospective respondents were identified by the FSA and participation in the research was voluntary. Interviews took place between February and March 2013 and lasted approximately 40 minutes. Interviews were structured around a set of standard topics which included:

- Perceptions of how the scheme is working
- Promotional activities since scheme implementation and the level of success in reaching and influencing target groups
- Knowledge of businesses that have improved/lost their rating over time
- Perceptions of food business commitment to the scheme and change over time
- Perceptions of appeals/revisit requests
- Establishing and maintaining consistency in scoring and determining ratings
- Sustainability of the scheme and resource implications
- Resources and funding concerns
- Ideas/best practice in sustaining the scheme and influencing target groups

The data from interviews with food safety officers helped to inform the Stage 2 case study sample.

Consumer focus groups

Focus groups with consumers were conducted in 12 of the 30 local authorities in the phase 1 sample, across England (4), Wales (3), Northern Ireland (3) and Scotland (2). Each group consisted of 7-8 participants who were screened to ensure awareness of the FHRS/FHIS and interest in new eating experiences and/or concern for food hygiene.

The focus groups lasted up to 90 minutes and took place during May-June 2013. Participation was voluntary and individuals received a £30 incentive/thank you for their cooperation. Thematic topics covered were:

- Deciding where to eat
- Assessing an unfamiliar food outlet
- Relevance of food hygiene
- Knowledge and views on the scheme
- Use of the scheme (different eating scenarios)
• Views on stickers, certificates and mandatory display
• The FSA food hygiene ratings website

The resulting sample consisted of 91 consumers. Participant characteristics and screening criteria results are presented in Tables A3.2 and A3.3.

Table A3.2: Consumer focus groups – participant characteristics

<table>
<thead>
<tr>
<th>Characteristic</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender</td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>44</td>
</tr>
<tr>
<td>Female</td>
<td>47</td>
</tr>
<tr>
<td>Age group</td>
<td></td>
</tr>
<tr>
<td>18-24</td>
<td>14</td>
</tr>
<tr>
<td>25-34</td>
<td>17</td>
</tr>
<tr>
<td>35-49</td>
<td>28</td>
</tr>
<tr>
<td>50-64</td>
<td>25</td>
</tr>
<tr>
<td>65+</td>
<td>7</td>
</tr>
<tr>
<td>How often eat out?</td>
<td></td>
</tr>
<tr>
<td>1 or more times a week</td>
<td>49</td>
</tr>
<tr>
<td>At least 2-3 times a month</td>
<td>41</td>
</tr>
<tr>
<td>Missing</td>
<td>1</td>
</tr>
<tr>
<td>Have you … (multiple response)</td>
<td></td>
</tr>
<tr>
<td>Seen FHRS/FHIS stickers /certificates on display</td>
<td>87</td>
</tr>
<tr>
<td>Visited website for FHRS ratings / FHIS results</td>
<td>21</td>
</tr>
<tr>
<td>FHRS rating / FHIS result influenced eating decision</td>
<td>34</td>
</tr>
<tr>
<td>None of the above/missing</td>
<td>3</td>
</tr>
</tbody>
</table>

TOTAL 91

Table A3.3: Consumer focus groups – participant attitudes to food

Participants were asked the extent to which they agree with the following:

I like to try out new food
I like to try new places to eat
I like to learn about a food establishment before visiting
I am aware of the standards of hygiene at places where I eat out

<table>
<thead>
<tr>
<th>Number of statements</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
agreed

<table>
<thead>
<tr>
<th>Agreement Level</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agreed with 4 statements</td>
<td>73</td>
</tr>
<tr>
<td>Agreed with 3 statements</td>
<td>18</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>91</strong></td>
</tr>
</tbody>
</table>

Food business survey

A telephone quantitative survey (n=800) was conducted with food business operators located within the 8 case study local authorities. The sample was designed so that findings could be reported separately for food businesses receiving each level of FHRS rating / FHIS inspection result as well as by national scheme and country. Fieldwork took place between May and June 2013.

Interview targets were set by area and by rating/inspection result (based on an April 2013 data extract) within each area in order to maximise the potential for comparing findings for businesses with different FHRS ratings / FHIS inspection results. Interviews were conducted via CATI (computer assisted telephone interview) and lasted approximately 15 minutes. Participation was voluntary. Research topics covered:

- Whether FHRS ratings/FHIS inspection results have been displayed in the establishment (and if so – where and what effect they feel that this has had on their customers)
- Action taken since inspection
- Extent to which improving ratings/achieving a ‘5’ or a ‘pass’ result is seen as a business priority

Data were tabulated by type of scheme, FHRS rating/ FHIS inspection results and country. Differences that were statistically significant at the 95% level of confidence were reported.

Food business qualitative interviews

Within each local authority sampled for case study, larger towns or local neighbourhoods (within cities) were selected based on prevalence of 0-2 FHRS ratings or Improvement Required FHIS results. Local food safety officers assisted with identifying the areas.

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34 There was insufficient food business sample within the rural local authority in Northern Ireland to satisfy the quota criteria. Therefore, the survey sample for Northern Ireland was extended to include two additional rural local authorities adjacent to the initial rural local authority.

35 For more details on the survey methods and instrument refer to the report: ‘FHRS/FHIS Evaluation – Food Business Survey’ available at: [ENTER URL](#).

36 This is where there can be 95% confidence that the results are not due to a chance event.
Recruitment was based on a quota sample of 8 food businesses per case study area. Because a focus of the research was to better understand the attitudes and motivations of poorer performing businesses in regards to food hygiene standards, the sample was concentrated on food businesses with a 0-2 FHRS rating or an Improvement Required FHIS inspection result. A total of 67 qualitative interviews were conducted with food business operators during May-June 2013. Interviews were voluntary and took place during normal business hours. Fieldwork was conducted face-to-face with the exception of three interviews which took place over the telephone. Interviews lasted approximately 15 minutes and were organised around the following topics:

- Views and experiences of the scheme
- Understanding on the aims of the scheme
- Views on displaying the rating/inspection result
- Changes made as a result of the scheme
- Views on customer engagement with FHRS/FHIS
- Suggestions for improvement

Characteristics of the 67 food businesses are available in Table A3.4.
Table A3.4: Qualitative fieldwork with food business operators – characteristics

<table>
<thead>
<tr>
<th>Characteristic</th>
<th>Count</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>FHRS Ratings</td>
<td></td>
<td>51</td>
</tr>
<tr>
<td>0</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>19</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>FHIS Inspection Results</td>
<td></td>
<td>16</td>
</tr>
<tr>
<td>Improvement Required</td>
<td>12</td>
<td></td>
</tr>
<tr>
<td>Pass</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Business type</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Restaurant/café</td>
<td>30</td>
<td></td>
</tr>
<tr>
<td>Takeaway</td>
<td>13</td>
<td></td>
</tr>
<tr>
<td>Pub</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Small retailer</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>Hotel/B&amp;B</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Butcher</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Ownership</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Independent</td>
<td>53</td>
<td></td>
</tr>
<tr>
<td>Chain</td>
<td>14</td>
<td></td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td>67</td>
</tr>
</tbody>
</table>

The numbers confirm the focus on poorer performing food businesses as 31 cases (46%) had received either a 0-2 FHRS rating or Improvement Required FHRS result while a further 28% had received a ‘3’ FHRS rating. The majority (79%) of food businesses in the sample were independently owned. Although several types of food businesses were included, the most common were either a restaurant/café (45%) or a takeaway (19%).

Qualitative data analysis

All interviews and focus groups were digitally recorded (when permission was granted) and professionally transcribed and anonymised.

Analysis followed a two stage approach. First, transcripts were systematically categorised using a charting ‘Framework’ technique. This used a series of spreadsheets (or charts) created in Microsoft Excel to devise a data matrix of research topics by study cases, with research themes comprising the columns and respondents comprising the rows. Case Information on sub-topics was entered into
the matrix cells. Themes were derived both from the interview topics and the data content. This structure was applied separately for each of the stakeholder groups – food safety officers, food businesses and consumers.

Second, systematic comparisons of views and experiences were made between respondents and across groups. This was aided by the spreadsheet structure. Cross-stakeholder analysis examined patterns and contrasts across the dataset as a whole, drawing out overarching themes. Longitudinal comparisons for changes and differences were made where relevant.

The analysis did not seek to identify the number of people having a particular view or experience or the prevalence of these. Rather, the qualitative data captured a range of views that exist in the populations under study.
Appendix 4: Fieldwork Instruments