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Communicating for Compliance

trial

Report prepared by Ipsos MORI for Food Standards

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Glossary of Terms

Competent Authority	A body or individual that has legally delegated capacity or power to perform a designated function. The Food Standards Agency is the UK's Central Competent Authority (CCA) for official controls on food safety, which gives them the authority to regulate and undertake official controls of food businesses, such as food hygiene inspections.
Food Standards	The agency was created in 2000 as a non-ministerial government department,
Agency (FSA)	governed by a board, and tasked with protecting consumers in relation to food.
Food Hygiene Rating	The FHRS was officially launched in 2010 and operates across England, Wales and
Scheme (FHRS)	Northern Ireland. The aim of the scheme is to enable consumers to make
	informed choices about the places they eat out or shop for food. It provides
	simple visual indicators about food hygiene standards at the time of the last local
	authority food safety officer's inspection, and is also available online. This is
	intended to encourage businesses to achieve and maintain high compliance
	standards with an overarching aim of reducing the incidence of foodborne illness.
Registration of food	Food business operators must register food establishment(s) under their control
business establishments	with the appropriate Competent Authority and this should be at least 28 days
	before the business starts trading or the food operations commence
Official controls	Official controls are any form of control performed for the verification of
	compliance with food law.
Risk rating scheme	A food inspection programme that prioritises controls based on risks posed by the
	food or the food business operator practices.
Control/ comparison	To assess the impact of the intervention, it is important to compare the outcomes
group	achieved through the intervention with the outcomes that would have occurred
	without the intervention. One way to do this is by using a control or comparison
	group. This allows for comparison of outcomes between the group of businesses
	involved in the intervention (i.e. those who received the letter designed for this
	trial) with a group of similar businesses who instead received the 'business as
	usual' correspondence from their LA. The difference in outcomes between these
	groups represents the impact of the intervention.

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We would also like to thank all the Food Business Operators who were willing to discuss their views of LA correspondence, and their priorities and information needs when getting ready to open their business.

Executive Summary

In August 2016, Ipsos MORI was commissioned by the FSA and BEIS to run a randomised control trial (RCT). Its purpose was to establish the effect of re-designed information¹ sent by local authorities on food business's Food Hygiene Rating (FHR). The study had 3 elements: Pre-trial intervention development, the randomised control trial, and post-intervention follow-up interviews with Food Business Operators (FBOs) in the treatment group. The trial found no treatment effect, i.e. those in the treatment group did not have a significantly higher FHR than those in the control group. Nevertheless, the report sets-out some practical considerations for optimising future communications, drawing on evidence from businesses and wider literature.

Pre-trial intervention development

Phase 1: Needs Analysis of the target population

The first phase in intervention development was a needs analysis of the target population (FBOs) that consisted of two complementary phases: i) 'information needs' **interviews** with Food Business Operators (FBOs) (n = 8) and ii) a series of **workshops** on FBO's information needs and a final **co-design** workshop with Local Authority (LA) officers.

Key findings from the information needs interviews with FBOs were:

- Compliance with food safety is one of a number of competing priorities for new food business owners. The period after registration can be stressful as FBOs prepare for opening (e.g. due to renovations, staff training, compliance with other regulations), meaning communications need to work hard to cut through.
- Given these challenges in opening a business, the tone should be supportive.
- Experienced FBOs made <u>more</u> use of advice as they knew what was involved and on which aspects they would benefit from advice by contacting their local authority in advance of the inspection.
- Whereas inexperienced FBOs did not usually realise that support was available, even though they were most in need of help. Such FBOs thus worked out the details of the process as they went along.
- There is a wide variation in literacy of FBOs, with some speaking English as a second language. This means the letter needs to be written in plain English and avoid the use of technical, legislative terminology.
- Correspondence should be simple and concise with key messages and required actions clearly explained and easily digestible such as:
 - o An acknowledgment that registration was successful to reassure FBOs.
 - o An explanation of the FHR and information on how to get a high rating.

¹ The re-designed letter /email is referred as the "the trial intervention" throughout this report. It was issued by local authorities to a randomly selected treatment group of newly registered food businesses. A control group of newly registered food businesses were sent their local authorities' existing information with regard to food safety and the food hygiene rating scheme,

- o Clarity about what they can expect next from their local authority.
- o Clarity of their own regulatory responsibilities.
- Further relevant information should be clearly signposted and easy to obtain.
- Given mode preferences varied between FBO's communications should be sent via traditional mail and electronically.

Information needs workshops and a co-creation workshop

To complement the interviews, BEIS ran a series of workshops across England and Wales with local authorities in order to identify the information needs of businesses as they prepare for opening. At a final co-creation workshop, Ipsos MORI, LA officers, business representatives, and policy experts from FSA and BEIS, agreed a set of overall 'design principles' for the trial letter/email. These included: that is should be personalised, concise and written in plain English, have a positive and supportive tone, contain a 'call to action' and include relevant links to information.

Phase 2: Optimal Design

Drawing on the insight from phase 1, FSA / BEIS designed the first draft of the intervention. Ipsos MORI performed an *Optimal Design* analysis² to refine this letter as well as integrating the findings, priority items and 'design principles' from Phase 1 to develop a new Communicating for Compliance letter prototype. It also included a one-page checklist that made it clear what actions an FBO ought to take to obtain a high FHR. An annotated letter is included in the annex showing how behaviour change content was integrated into the intervention design.

Phase 3: Rapid Appraisal of Prototypes (RAP)

In the final phase prior to trial we used Ipsos MORI's mixed-method RAP approach to assess the prototype trial letter in further interviews with FBOs (n = 7) that had recently been inspected. Two letters were tested, along with the checklist, in each interview: a one-page version based on the optimal design, and a longer version to provide an additional sense check of FBOs' preferred balance of concision and detail. In refining the letter after this phase, key messages from the longer letter were therefore retained while keeping the letter to a single page. More prominent sign-posting was used for the checklist to encourage its wider use. These changes informed the final design of the letter ahead of the trial,

The randomised control trial

LA selection

40 local authorities were selected to take part in the trial from a list of 60 that were recruited by BEIS.

Those excluded had registered fewer than one new FBO per week on average over the previous 12 months

- including such authorities would have contributed disproportionately to the administration of the trial and

weakened the analysis. The authorities represented a mix of regions, rural and urban authorities and authority types (e.g. unitary authorities, metropolitan and non-metropolitan boroughs etc.) ³

Randomisation of trial establishments

The trial establishments were randomised to the treatment and control groups in sequential order within local authority and establishment type in four categories: restaurant/café/canteen; pub/bar/nightclub; takeaway; and hotel/bed & breakfast/guest house. This process continued until the week in which 500 businesses had been allocated to each group. The final totals were 504 in the treatment group and 500 in the control group.

Statistical analyses

The first analysis looked at the difference between the proportion of establishments rated as good (4) or very good (5) in the two experimental groups. The proportion rated as good or very good in the control group was 77.2% and in the treatment groups it was 76.6%. The implied treatment effect was -0.7% which was not significant at the 0.05 level (p = 0.85). A chi-square test was used to test the difference in proportions. A consistent result was obtained when testing the rating score: the mean rating for the control group was 4.04 and for the treatment group was 4.10. The difference was not significant at the 0.05 level (p = 0.54). A T-test was used to test the difference in means.

Repeating the analyses on the proportion of good or very good ratings within establishment type also showed no significant impact of the treatment. The p-values for the differences ranged from p = 0.23 for restaurant/café/canteen to p = 0.98 for pub/bar/nightclub.

In order to control for other possible factors, a logistic regression model was fitted with good or very good versus other ratings as the outcome measure and experimental group, local authority, establishment type and type of cuisine as covariates. For stability of the model, the local authorities with small numbers of ratings were merged into a single category. The logistic regression model again showed that there was no impact from the treatment (odds ratio = 0.94; p = 0.77).

Reactions to the trial letter from FBOs in the treatment group

The initial purpose of undertaking post-trial interviews with FBOs (n=10) was to establish whether this impacted their behaviour. As none of the ten interviewees could recall the trial letter they were asked to react to the letter which they were sent by Ipsos MORI researchers during the post-trial interview.

Registration Process

Most FBOs understood they are required to register their food business with their Local Authority prior to opening. In total, nine of ten did online registration. None could recall in detail the experience of online registration but given it was so unmemorable they all suggested it was easy and quick.

Recall of the trial letter

We can infer the lack of recall of the trial letter is likely to be a factor why there was no treatment effect - because not enough businesses engaged with the content of the intervention. Indeed, preparing a business for opening was seen as a very busy period and FBO priorities are having the right stock, and acquiring and training staff. As business owners who receive a lot of post they felt it was no surprise they had not opened and read the trial letter. They suggested that making it clear in the subject line (email) and on the envelope (letter) that the correspondence contained important food safety information and that the content can help them achieve a high FHR, might encourage them to engage with the correspondence, i.e. to open the email or read the letter.

Reactions to the trial letter

After reviewing the trial letter, they all said it was clear that it was intended to encourage business owners to comply with food safety rules. The checklist was seen as particularly useful - several suggested that if they had received it they would have used it as a training resource as well as a reminder for staff to undertake the necessary checks to maintain high standards. The FBO welcomed the link to the Growth Hubs, for financial and other business support advice.

There was a lot of positivity about the layout, and the length of the letter, and that the use of bold, underline and colour made it easy to comprehend and engage with. All understood that the letter was intended to help businesses achieve a high food hygiene rating and the fact that it made clear there can be business benefits if they were to obtain one, resonated with many.

Conclusions and recommendations

The trial letter and accompanying checklist is more 'business focused', by clearly communicating the necessary information need to obtain a high FHR. It utilises behavioural science to encourage businesses to act on the advice, if they can be made to read the content. The period following registration is a key opportunity in which to provide businesses with information that supports compliance. Indeed, the post-trial interviews with FBOs found that the re-designed information (letter / email) is instructive as it sets-out what FBOs must do to achieve a high FHR. The letter also included a link to BEIS's Business Support Helpline⁴ or to Local Growth hubs which can provide financial advice and business support. It is hypothesised that the hubs could also help FBOs become more resilient and successful. However, further research is needed to test this.

⁴ https://www.gov.uk/business-support-helpline

The behavioural theory, insight and testing used in the development of the trial letter determined that the letter should be no longer than a single side, and that the checklist focussed on the right issues. Insight from interviews with FBOs also demonstrated that additional detail in the letter (what happens next and when is that likely to be, what will I be inspected on, what the FHRS is and how to get a high one) was useful and should be retained. However, further work is needed to encourage businesses to engage with the new correspondence.

Previous Ipsos MORI research⁵ has identified different ways to encourage consumers to engage with energy supplier correspondence including **personalisation**, **branding**, **communicating urgency and immediacy**, **and colour on the envelope**. While the correspondence in this trial was personalised, the focus was on improving the content of the letter/email itself. In terms of opening emails, the same research found that: 'the subject line is significant because it and the identity of the sender, are the only means of persuading consumers to open emails'.

Therefore FBOs might be persuaded to open correspondence if 'IMPORTANT FOOD SAFETY INFORMATION' or similar, was added in the subject line (of an email) or on the envelope (of a letter), indicating it's content. The use of the FSA's Food Hygiene rating scheme 0 to 5 logo might also be helpful as it is easily recognisable, including for those FBOs that struggle to read English as it is highly visual in nature. In addition, highlighting that the content could help businesses achieve a high Food Hygiene Rating (FHR) could encourage them to open the letter or email.

Department for Health research found that prompting patients about forthcoming appointments, led to less appointments being missed. This principle could be applied in the context of food businesses. An acknowledgement email and / or text message sent by LAs after receiving a registration form is an opportunity to prompt the FBO to look out for further food safety information in a letter or email.

We suggest that if more work could be done to encourage businesses to open and read the new correspondence then this could have an impact on the number of newly registered businesses who obtain a high FHR, meet their legislative responsibilities, and boost economic growth in local economies.

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 $^{^{5}}$ https://www.ofgem.gov.uk/ofgem-publications/39464/prompting-engagement-and-retention-written-customer-communications-pdf

1 Introduction

1.1 Background

The Food Standards Agency (FSA) and Local Authorities (LAs) have a duty⁶ to support and enable food businesses to comply with food hygiene regulations. Survey evidence⁷ suggests that most want to be compliant, however, it is hypothesised some may not be reading or acting on FSA or LA information, resulting in low Food Hygiene Rating (FHR). Some new food businesses do not comply with food hygiene regulations, which may necessitate expenditure to reach compliance. As newly registered businesses are likely to have a low turnover in the immediate term, this financial pressure can threaten the survival of the business. Given the high prevalence of SMEs (up to 95% in some localities) their survival is important to local economies. Therefore, improving compliance with food hygiene regulations is important to both the FSA and BEIS.

1.2 Study aim

The FSA and BEIS wanted to investigate whether changes to LA correspondence⁸ could improve the performance of businesses on the FHR assessment.

1.3 Study objectives

The objectives of this study were to:

- 1. Review the current correspondence to newly registered FBOs and adapt to a more business focused approach, while maintaining clarity about what is required to ensure compliance.
- 2. Revise the correspondence based on feedback and advice from the FSA and BEIS, LAs, Trade Associations, FBOs and behavioural insight specialists.
- **3.** Obtain feedback from food businesses on the draft trial letter and the final trial letter through depth interviews.
- **4.** Devise a pilot model that can be effectively evaluated and used to provide evidence to inform recommendations about food communications from FSA/LAs.

1.4 Study approach

In August 2016, Ipsos MORI was commissioned by the FSA and BEIS to deliver a randomised control trial (RCT), to understand the effect of re-designed correspondence (i.e. the trial letter) on the FHR. This study had 3 elements:

- 1. Pre-trial intervention development: The trial letter was developed by the FSA and BEIS with input from Ipsos MORI's Behavioural Research team, and insight from LA food safety officers, food businesses, Food Trade Associations and interviews with eight Food Business Operators (FBOs)⁹. A draft version was subsequently tested in a Rapid Appraisal of Prototype (RAP) interviews with a different group of newly registered FBOs (n=7). Further refinements were made ahead of the trial.
- 2. The randomised control trial: this method allowed the effects of the trial letter to be compared against the unrevised correspondence, to establish the impact of the trial letter. In practice, 1,004 newly registered food businesses in 35 local authorities were randomly allocated to the treatment group¹⁰ and the control group¹¹. The trial ran from February to November 2017 and data returns from participating LAs meant we could compare the FHR of 636 businesses.
- 3. Post-intervention follow-up interviews: this involved interviews with ten FBOs in the treatment group. These interviews were initially intended to explore reactions to the letter and establish whether it prompted compliance; but after it was discovered they had not engaged with it, we explored how they prepared for inspection and their reactions to the letter after being sent it by Ipsos MORI researchers.

1.4.1 Structure of the rest of the report

Section 2: Intervention development – the sections discusses the various inputs to intervention development including newly registered FBOs views of their information needs around compliance, feedback from LAs, behavioural theory, as well as further testing through RAP interviews with FBOs.

Section 3: Isolating the treatment effect – this brief section explains the randomisation process, the trial data returned to us by participating LAs, the statistical tests applied to ascertain the treatment effect.

Section 4: Understanding the treatment effect – this section discusses the views of FBOs in the treatment group in terms of the registration process, trial letter recall, and whether they acted on this information.

Conclusions and recommendations – this section set-outs some ideas to encourage food business to engage with LA correspondence.

2 Insight and testing to create the trial letter

This section discusses the various inputs into the development of the trial letter including the information needs of FBOs, insight from LA officers, behavioural theory, as well as further testing through RAP interviews with FBOs.

2.1 Phase 1: Needs Analysis

Needs analysis of the target population consisted of two complementary phases: i) 'information needs' **interviews** with Food Business Operators (FBOs) (n = 8) and ii) a series of workshops and then a final **co-design workshop** with LA officers.

2.1.1 Information needs interviews

These interviews aimed to understand the process FBOs went through from registration to their first inspection, and importantly for this trial, what information was sought during this process. **Eight** interviews were carried out by telephone with FBOs¹². The interviews explored user needs in terms of content, tone, layout and mode of delivery, and whether these needs were met by the correspondence they had received. The interviews thus sought suggestions for improvement to post-registration correspondence that would support food businesses in fulfilling their regulatory responsibilities. Key findings from the interviews were:

- Compliance with food safety is one of a number of competing priorities for new food business owners. The period after registration can be stressful as FBOs prepare for opening (e.g. due to renovations, staff training, compliance with other regulations), meaning communications need to work hard to cut through.
- Given these challenges in opening a business, the tone should be supportive and the messages should be salient.
- Experienced FBOs made <u>more</u> use of advice as they knew what was involved and on which aspects they would benefit from advice by contacting their local authority in advance of the inspection.
- Whereas inexperienced FBOs did not usually realise that support was available, even though they were most in need of help. Such FBOs thus worked out the details of the process as they went along.
- There is a wide variation in literacy of FBOs, with some speaking English as a second language. This means the letter needs to be written in plain English and avoid the use of technical, legislative terminology.
- Correspondence should be simple and concise with key messages and required actions clearly explained and easily digestible such as:
 - o An acknowledgment that registration was successful to reassure FBOs.
 - o An explanation of the FHRS and information on how to get a high rating.
 - o Clarity about what they can expect next from their local authority.

- o Clarity of their own regulatory responsibilities.
- Further relevant information should be clearly signposted and easy to obtain.
- Given mode preferences varied between FBO's communications should be delivered via traditional mail and electronically.

2.1.2 Information needs workshops and a co-design workshop

BEIS ran an initial series of workshops across England¹³ with local authorities to identify the information needs of businesses as they are getting ready to commence trading. At a final co-creation workshop, Ipsos MORI presented this insight and the findings from the interviews with FBOs to LA officers and policy experts from FSA and BEIS using the structure – content, tone, layout and mode. The prioritisation exercise generated a key item shortlist in each category which informed the development of overall 'design principles.' It also highlighted that businesses would prefer to receive correspondence by both post and email, however for the trial, LAs followed their 'Business as Usual' procedures which for the most part was to send correspondence by post.

2.2 Phase 2: Optimal Design

Drawing on the insight from Phase 1, FSA / BEIS designed the first draft of the intervention. Ipsos MORI performed an *Optimal Design* analysis¹⁴ to refine this letter as well as integrating the findings, priority items and 'design principles' from Phase 1 to develop a new C4C letter prototype. Resdesign was a collaborative, iterative exercise involving both FSA / BEIS and Ipsos MORI. Key alterations to the letter included a reduction in length to 1-page, simplified language and redesign of layout to clarify sequence of information and provide visual cueing devices. It also included a one-page checklist that made it clear the actions an FBO needs to take to obtain a high FHR.

Behaviour change content was also included in the letter. A first salient message, a generic gain frame – *Good preparation for inspection gives your business the best possible chance of a 5 rating* – was used because it was hypothesised that an initial loss frame or more threatening communication¹⁵ would provoke a defensive reaction and disengagement from the desired preparatory behaviour. A second salient message– *Businesses say displaying a high rating has helped them win more customers* – *we don't want you to miss out!* – comprised both a *Social Proof* and an *Anticipated Inaction Regret* component. When individuals want to act effectively in novel, ambiguous or uncertain situations they often rely on *social proof* – a descriptive norm i.e. do what others do – to guide their own behaviour.¹⁶ In the case of business owners, competition was invoked because competition can be a driver of behaviour among organisations. *Anticipated regret* and specifically *anticipated*

 $^{^{13}}$ Workshops were held in London, Devon, Birmingham and York. Welsh LAs attended the Devon workshop

*inaction regret*¹⁷¹⁸ have been demonstrated to be good predictors of behaviour. An annotated letter is included in the annex showing how behaviour change content was integrated into the intervention design.

2.3 Phase 3: Rapid Appraisal of Prototypes (RAP)

In the final phase prior to trial we used Ipsos MORI's mixed-method RAP approach to assess the prototype C4C letter in further interviews with FBO's (n = 7) that had recently been inspected. The RAP interviews took place face-to-face at the FBOs' premises.

Two letters were tested in each interview: a one-page version based on the optimal design, and a longer version to provide an additional sense check of FBOs' preferred balance of concision and detail. A checklist listing the steps an FBO should take to achieve a good rating was included. The same version was used with both letters and therefore only tested once with each participant. The RAP interviews consisted of two components for each prototype. First, a qualitative component using a 'concurrent think-aloud' where FBOs were given a prototype correspondence to read and say what occurred to them as they were reading it. After this exercise FBOs were asked to: reflect further on the format and content of the letter; provide suggestions for improvement if relevant; and say what they thought were the key messages of the letter. The qualitative component was followed by semi-structured questions that asked FBOs to assess various aspects of the materials again drawing on SAM and the System Usability Scale (SUS).¹⁹

These interviews found that some of the additional detail in the long letter (what happens next and when is that likely to be, what will I be inspected on, what the FHRS is and how to get a high one) was useful and should be retained, as was the checklist. In refining the letter after this phase, key messages from the longer letter were therefore retained while keeping the letter to a single page. More prominent sign-posting was used for the checklist to encourage its wider use. These changes informed the final design of the letter ahead of the trial.

3 Isolating the effect of the trial letter

This brief section explains the randomisation process, the trial data returned to us by participating LAs, and the statistical tests applied to isolate the treatment effect.

3.1 LA selection

47 local authorities were selected to take part in the trial from a list of 60 that were recruited by BEIS. Those excluded had registered fewer than one new FBO per week on average over the previous 12 months - including such authorities would have contributed disproportionately to the administration of the trial and weakened the analysis. The authorities represented a mix of regions, rural and urban authorities and authority types (e.g. unitary authorities, metropolitan and non-metropolitan boroughs etc.) ²⁰

The LAs selected were: Bournemouth, Bradford, Brighton-hove, Broxbourne, Burnley, Charnwood, Cheshire West and Chester, Chesterfield, Derby City, East Hampshire, Elmbridge, Enfield, Greenwich, Hambleton, Hinckley & Bosworth, Horsham, Huntingdonshire, Lancaster City, Luton, Mid Kent, Northampton, NW Leicestershire, Oldham, Plymouth, Rochdale, Rossendale, Slough, South Cambridgeshire, South Norfolk, South Oxfordshire and the Vale of the White Horse, Stoke, Stroud, Tandridge BC, Torbay, Wakefield, Watford, West Somerset and Taunton Deane, Wigan, Worcestershire, York, Chelmsford, Denbighshire, Newport, Blaenau Gwent, Pembrokeshire, Torfaen and Poole.

3.2 Allocation to the treatment and control groups

Data returns from local authorities

Each week, participating local authorities sent details of all businesses that had registered the previous week to Ipsos MORI. To assist with data matching and cleaning throughout the project this included information such as the establishment name and address. However, for isolating the treatment effect, the key variables were the local authority name and establishment type.

Randomisation protocol

In order to isolate the treatment effect, Ipsos MORI established a randomisation protocol that ensured an even split of businesses was allocated to the control and treatment group for each combination of local authority and establishment type. This was essential as for example, control correspondence varied substantially across local authorities, therefore an abundance of businesses from authorities with very limited correspondence in the control group could have overstated the impact of the intervention, or an abundance of businesses that

received particularly detailed correspondence in the control group could have understated the impact. Similarly, there may be systematic trends by establishment type that meant an unequal split of establishment types in the different groups could overstate or understate the impact of the intervention.

The establishments were randomised to the treatment and control groups in sequential order within local authority and establishment type in four categories: restaurant/café/canteen; pub/bar/nightclub; takeaway; and hotel/bed & breakfast/guest house. This was operationalised by filling in a spreadsheet (see Table 1) that alternatively assigned the establishments to the control and treatment groups within local authority and establishment type by simply adding each establishment to the next available cell on the appropriate row. The experimental group that the establishment was assigned to was then read off from the column heading.

In order to balance the control and treatment groups, half of the first establishments in each local authority were allocated to the control group and half to the treatment group. This was done by shading out cells to indicate that they should not be used.

Local							
Auth	Туре	Description	CONTROL	TREAT	CONTROL	TREAT	CONTROL
LA 1	TYPE 1	Restaurant/café/canteen					
LA 1	TYPE 2	Pub/Bar/Nightclub					
LA 1	TYPE 3	Takeaway					
LA 1	TYPE 4	Hotel/B&B/Guest House					
LA 2	TYPE 1	Restaurant/café/canteen					
LA 2	TYPE 2	Pub/Bar/Nightclub					
LA 2	TYPE 3	Takeaway					
LA 2	TYPE 4	Hotel/B&B/Guest House					
LA 3	TYPE 1	Restaurant/café/canteen					
LA 3	TYPE 2	Pub/Bar/Nightclub					
LA 3	TYPE 3	Takeaway					
LA 3	TYPE 4	Hotel/B&B/Guest House					

Table 1 Template for allocation of establishments to experimental group

After each weekly allocation, the Ipsos MORI trial team sent each local authority the allocated group for the businesses that had registered that week. The local authorities then sent the intervention or control correspondence as relevant.

This process continued until the week in which 500 businesses had been allocated to each group. The final totals were 504 in the treatment group and 500 in the control group

3.3 Data returns

In the months after correspondence was sent by local authorities to newly registered food businesses, most businesses received a food hygiene inspection. For the trial to be able to measure the impact of the intervention, it was necessary to compare the FHRS of the two groups. The local authorities therefore returned to Ipsos MORI where possible the FHRS and date of inspection for each of the food businesses registered in

the trial period. They were also asked to append additional data to facilitate more detailed analysis. Not all of this data was routinely collected by LAs, meaning some data was not returned in sufficient numbers to be included in the analysis. The data requested is listed below – variables that were included in the analysis are highlighted in **bold**:

- Date of first inspection
- First FHRS
- Correspondence channel (i.e. post or email)
- Provision of pre-inspection advice, either paid or free, and face to face or by telephone/
- Type of cuisine
- Size of food business (by number of employees)
- If the FBO had previous experience of running a food business

However, for around one in three businesses (368) the data was not returned – in around half of these cases (189), the local authority advised that it was not possible to return the data, generally because the business had ceased trading (54 businesses) or because they had not been inspected yet (61). For most of the remainder (161), it was not possible to obtain any information from the local authority despite being sent regular reminders from the Ipsos MORI team. Businesses without a rating could not be analysed, and it was also necessary to remove a small number of businesses that were duplicates (5) or that the local authority flagged were not eligible for the study (6). The final number of businesses included in the quantitative analysis was 636.

Of the 636 participating establishments (i.e. ones for which we obtained a rating), 316 had been allocated to the control group (50%) and 320 to the treatment group (50%), demonstrating the randomisation protocol worked well in practice. The allocations within establishment type and local authority were also well controlled. Of those for which we obtained a rating, the balance by establishment type matched the allocations, however there was a significant amount of variation by local authority – ratings were obtained for 90% of businesses or more in some authorities, whereas in others no ratings were obtained at all.²¹

Table 2 shows the split of the number of establishments for which we had a rating for in the control and treatment groups by establishment type and local authority (any with a sample size of 10 or more). That shows that the matching resulted in fairly well-balanced samples – we would expect some deviation from a 50%/50% split within LAs and establishment type because a rating was not obtained for about a third of the sampled establishments.

²¹ Possibly because they had not inspected the Businesses yet, because of prioritisation and large numbers of new businesses.

Table 2 Sizes for control and treatment (analysis) samples by establishment type and local authority²²

	Sample size				Percentage (%)			
	Control	Treatment	Total	Control	Treatment	Total		
Establishment type:								
Hotel/ BnB/ Guesthouse	10	13	23	43%	57%	100%		
Pub/ Bar/ nightclub	33	37	70	47%	53%	100%		
Restaurant/ café/ canteen	180	178	358	50%	50%	100%		
Takeaway	93	92	185	50%	50%	100%		
,								
Local Authority:								
Blaenau Gwent	10	9	19	53%	47%	100%		
Borough of Poole	5	5	10	50%	50%	100%		
Bradford	34	34	68	50%	50%	100%		
Chelmsford City Council	8	10	18	44%	56%	100%		
Chesterfield Borough Counci	13	14	27	48%	52%	100%		
Chester West and Chester	26	27	53	49%	51%	100%		
Elmbridge Borough Council	12	9	21	57%	43%	100%		
Hambleton District Council	7	8	15	47%	53%	100%		
Luton	10	11	21	48%	52%	100%		
Maidstone	7	14	21	33%	67%	100%		
Northampton	9	7	16	56%	44%	100%		
Norwich City Council	12	8	20	60%	40%	100%		
Oldham Metropolitan Borou	9	9	18	50%	50%	100%		
Plymouth City Council	21	18	39	54%	46%	100%		
Rochdale	14	24	38	37%	63%	100%		
Rossendale Borough Counci	8	5	13	62%	38%	100%		
South Cambridgeshire DC	4	7	11	36%	64%	100%		
Swale	13	19	32	41%	59%	100%		
Torbay	27	22	49	55%	45%	100%		
Tunbridge Wells	14	11	25	56%	44%	100%		
Vale of the White Horse	4	3	7	57%	43%	100%		
Wakefield Council	9	8	17	53%	47%	100%		
Worcestershire	23	21	44	52%	48%	100%		
Other LAs	17	17	34	50%	50%	100%		
TOTAL	316	320	636	50%	50%	100%		

3.4 Analyses

The first analysis looked at the difference between the proportion of establishments rated as good (4) or very good (5) in the two experimental groups (Table 3). The proportion rated as good or very good in the control

group was 77.2% and in the treatment groups it was also 76.6%. The implied treatment effect was -0.7% which was not significant at the 0.05 level (p = 0.85). A chi-square test was used to test the difference in proportions. A consistent result was obtained when testing the rating score: the mean rating for the control group was 4.04 and for the treatment group was 4.10. The difference was not significant at the 0.05 level (p = 0.54). A T-test was used to test the difference in means.

Table 3 Establishments rated as good or very good for the two experimental groups

	Sample			Р	Percentage (%)			
	Control	Control Treatment Total		Control	Treatment	Total		
Rating:								
Good (4) or very good (5)	244	245	489	77.2%	76.6%	76.9%		
Other (0 to 3)	72	75	147	22.8%	23.4%	23.1%		
Total	316	320	636	100.0%	100.0%	100.0%		

Table 4 Establishments rated as (very) good for the two experimental groups by establishment type

	Sample			Р	Percentage (%)			
	Control	Treatment	Total	Control	Treatment	Total		
Hotel/BnB/Guesthouse:								
Good (4) or very good (5)	9	13	22	90.0%	100.0%	95.7%		
Other (0 to 3)	1	0	1	10.0%	0.0%	4.3%		
Total	10	13	23	100.0%	100.0%	100.0%		
Pub/Bar/Nightclub:								
Good (4) or very good (5)	24	27	51	72.7%	73.0%	72.9%		
Other (0 to 3)	9	10	19	27.3%	27.0%	27.1%		
Total	33	37	70	100.0%	100.0%	100.0%		
Restaurant/Café/Canteen:								
Good (4) or very good (5)	155	145	300	86.1%	81.5%	83.8%		
Other (0 to 3)	25	33	58	13.9%	18.5%	16.2%		
Total	180	178	358	100.0%	100.0%	100.0%		
Takeaway:								
Good (4) or very good (5)	56	60	116	60.2%	65.2%	62.7%		
Other (0 to 3)	37	32	69	39.8%	34.8%	37.3%		
Total	93	92	185	100.0%	100.0%	100.0%		

²² Other LAs refers to those with small numbers of returns: City of York, East Dorset, East Hampshire, Newport, Hinckley and Bosworth, Stroud, Charnwood, South Oxfordshire, North West Leicestershire, Burnley, Poole and Torfaen. The remaining LAs listed at the start of this chapter had zero returns and are not included in the analysis.

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Repeating the analyses on the proportion of good or very good ratings within establishment type (Table 4) also showed no significant impact of the treatment. The p-values for the differences ranged from p = 0.23 for restaurant/café/canteen to p = 0.98 for pub/bar/nightclub.

In order to control for other possible factors, a logistic regression model was fitted with good or very good versus other ratings as the outcome measure and experimental group, local authority, establishment type and type of cuisine as covariates (Table 5). For stability of the model, the local authorities with small numbers of ratings were merged into a single category. The logistic regression model again showed that there was no impact from the treatment (odds ratio = 0.94; p = 0.77).

Table 5 Regression model of good or very good rating

				Degrees		
	Parameter	Standard	Wald	of		Odds
	Estimate	Error	statistic	freedom	p-value	ratio
Experimental group:						
Control	0.00	(baseline)				
Treatment	-0.06	0.21	0.09	1	0.77	0.94
Local Authority:			52.3	15	<0.01	
Blaenau Gwent	0.00	(baseline)				
Bradford	1.16	0.60	3.80	1	0.05	3.20
Chelmsford City Council	0.68	0.74	0.86	1	0.35	1.98
Chesterfield Borough Council	0.27	0.65	0.17	1	0.68	1.31
Chester West and Chester	0.48	0.59	0.66	1	0.42	1.61
Elmbridge Borough Council	1.36	0.81	2.82	1	0.09	3.89
Luton	-1.60	0.76	4.45	1	0.03	0.20
Northampton	-0.15	0.73	0.04	1	0.84	0.86
Norwich City Council	0.02	0.71	0.00	1	0.98	1.02
Oldham Metropolitan Boroug	0.94	0.77	1.49	1	0.22	2.55
Plymouth City Council	1.08	0.66	2.70	1	0.10	2.95
Rochdale	0.99	0.65	2.34	1	0.13	2.69
Torbay	0.02	0.61	0.00	1	0.98	1.02
Tunbridge Wells	1.56	0.80	3.80	1	0.05	4.78
Worcestershire	1.13	0.64	3.11	1	0.08	3.10
Other LAs	1.82	0.58	9.76	1	<0.01	6.15
Establishment Type:			24.4	3	<0.01	
Hotel/BnB/Guesthouse	0.00	(baseline)				
Pub/Bar/Nightclub	-2.74	1.11	6.12	1	0.01	0.06
Restaurant/Café/Canteen	-1.88	1.07	3.06	1	0.08	0.15
Takeaway	-2.91	1.09	7.17	1	<0.01	0.05
- 1						
Cuisine:			12.4	4	0.01	
Chinese	0.00	(baseline)		-		
European	-1.61	0.60	7.24	1	<0.01	0.20
Indian	-0.67	0.47	2.06	1	0.15	0.51
Other	-1.42	0.53	7.05	1	<0.01	0.24
Missing	-1.11	0.65	2.92	1	0.09	0.33
0		5.05	5_	_	5.55	2.33
Intercept	3.51	1.27	7.63	1	<0.01	33.45
шенері	3.31	1.21	7.03	1	~O.UI	JJ.4J

3.5 Study limitations

This study aimed to establish the impact of the intervention (revised LA correspondence) on compliance with food safety in newly registered businesses, using the FHRS as a proxy indicator. However, the ability to measure the impact of the intervention on behaviour in this way is limited given that:

- Broad compliance is already high. In the control group, 77% achieved a FHR of 4 or above, which suggests there is a small proportion of businesses for whom regulatory correspondence has the potential to improve compliance.
- Some FBOs in the treatment group who are already broadly compliant or above may have made changes to their behaviour because of the correspondence but this might not have been picked up by the FHR- as it is a fairly crude proxy for behaviour change and therefore these effects would be missed by the trial.

More fundamentally, for an intervention of this type to impact on behaviour, it is necessary of course for the FBOs to engage with the communications they receive. Therefore, the absence of a treatment effect (i.e. an impact) could mean that FBOs saw the letter but it was not suitably engaging to have the desired effect, However it could be that FBOs do not routinely read LA correspondence, meaning that further work is required to encourage businesses to open it in the first place. The latter was supported by the qualitative evidence as discussed in the final chapter.

4 Reactions to the trial letter from FBOs in the treatment group

The initial purpose of undertaking interviews with ten FBOs²³ was to establish their views of the letter, and more importantly whether this impacted FBO behaviour. As none of the ten interviewees could recall the trial letter they were asked to react to the letter which Ipsos MORI researchers sent to them during the interview. Although we were not able to discuss the extent to which it prompted compliance, the findings are still useful as they do corroborate the data collected in the pre-trial stage.

4.1 Registration Process

Most FBOs understood they are required to register their food business with their Local Authority prior to opening. Those who had prior experience of the food industry were aware it could be done online; those new to the industry were notified by their staff or by other FBOs in the same sector; some did their own research, either a Google search or direct to a local authority website. A couple of FBOs visited their Local Authority where one was told it could be done online, and the other completed a registration form there and then. In total, nine of ten did online registration. None could recall in detail the experience of online registration but given it was so unmemorable they all suggested it was easy and quick.

"I know a chef who told me about the inspection – he put me in touch with someone from the local authority"

FBO, Restaurant/ Café/ Canteen, Non-metropolitan borough

"I got the information online – on the Environmental Health website you have a good food practice programme which gives you the information there."

FBO, Hotel/ B&B/ Guesthouse, Unitary authority

4.2 Recall of the trial letter

None of the interviewees could spontaneously recall receiving the trial letter and after they had been sent a copy during the interview, they all confirmed they had not seen it. However it is important to note that these interviews took place up to six months after the letter was sent.

'I don't think I got this actual letter though, I think it's what the inspector told me'

FBO, Restaurant/ Café/ Canteen, Non-metropolitan borough

We can infer this is likely to be a factor why there was no treatment effect - because not enough businesses engaged with the content of the intervention. Indeed, preparing their business for opening was seen as a very busy period and their priorities are having the right stock, and acquiring and training staff. As business owners who receive a lot of post they therefore felt it was no surprise they had not opened and read the trial letter. They suggested that making it clear in the subject line (email) and on the envelope (letter) that the content can help them achieve a high FHR might encourage FBOs to engage and read LA correspondence.

Preparing for food safety inspection

Although nobody could recall the trial letter, nine of ten participants were aware they would be inspected. The most common way of finding this out was via the FSA and / or LA website and / or; others were aware from their own experience of food safety training, through existing contacts in the food industry, and one participant via an unspecified online forum for small businesses.

"I know the rules and regulations from my previous jobs"

FBO, Restaurant/ Café/ Canteen, Unitary authority

One participant said they assumed they would be inspected and their preparatory work was based on hygiene and cleanliness standards they applied in their own home.

Overall, there was good awareness of the Safer Food Better Business pack, either because they had seen it online (FSA / LA website) or because it had been given to them by someone they knew, or because it was left in the establishment by a previous owner. In general, it was considered a helpful resource as it made it clear what they ought to have in place to achieve a high food hygiene rating, including a food safety management system. Some said they also watched You-Tube clips of food preparation demonstrations, which also provided tips on how to avoid the risk of cross contamination. This suggests there is value in retaining the links included in the trial letter.

4.3 Reactions to the trial letter

After reviewing the trial letter, they all said it was clear that it was intended to encourage business owners to comply with food safety rules. Spontaneously, most said they recognised information about the Food Hygiene Rating Scheme, the logo itself, and of course the SFBB pack.

"If I had seen this letter I would definitely have read it"

FBO, Hotel/ B&B/ Guesthouse, Unitary Authority

The checklist was seen as particularly useful - several suggested that if they had recalled receiving it they would have used it as a training resource as well as a reminder for staff to undertake the necessary checks to maintain high standards. Two FBOs said the checklist was easier to digest than the information available on the FSA / LA website but felt there was still sufficient detail that they would know what to do to obtain a high rating.

"It would have been extremely useful. The checklist tells you what the inspector was looking for whereas we were guessing what they were looking for. If you know what the parameters are then you can meet them".

FBO, Restaurant/ Café/ Canteen, Metropolitan borough

"Just having a checklist we would have been more confident for the inspection. Most of it on there is what we knew anyway, but it would have been nice to have as we didn't know what they were checking for"

FBO, Pub/ Bar/ Nightclub, Non-metropolitan borough

None of the interviewees were aware that Growth Hubs²⁴ existed, however the possibility of financial support appealed and most said they would be likely to follow through to more information using the hypertext link included in the trial letter – if in email format.

There was a lot of positivity about the layout, and the length of the letter, and that the use of bold, underline and colour made it easy to comprehend and engage with. All understood that the letter was intended to help businesses achieve a high food hygiene rating and the fact that it made clear there can be business benefits if they were to obtain one resonated with many.

"All the essential bits stand out - everything important is highlighted which is handy if you are reading something quickly"

FBO, Restaurant/ Café/ Canteen, Non-metropolitan borough

4.4 Suggested improvements

Content

Some felt that the letter and checklist did not cover all the important issues or did not provide sufficient guidance on certain issues. One FBO said their inspection identified a problem with their filter / extraction system in the kitchen area, something that was not specifically covered in the checklist. However, if the checklist covered all possible contraventions it would not meet the optimum one-page length. Others wanted the checklist to be more exact on temperature monitoring and temperature controls and suggested this could be resolved if each item in the checklist had hyperlinks to user-friendly and digestible sources. Given inadequate temperature control is a common factor in food safety incidents and outbreaks we suggest that the checklist should make it clear what are the required temperature for the cooking, cooling and storage of food.

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Mode of delivery

It is perhaps because researchers asked FBOs about a letter that they assumed it would typically be sent in the post. Across the ten interviews some wanted it sent in the post instead of email and vice versa. In order to increase the chances of it being read and acted upon, some would prefer to read an email but would provide a hard copy to staff in the kitchen. Therefore, it is reasonable to suggest that if LA correspondence is to 'cut-through' to the intended audience then a combination of the two is likely to be the optimal approach. However, this may not always be possible given an increasing push to digital in public services. Irrespective of the mode of delivery (i.e. mail or email), interviewees said the envelope / subject line should make it clear what the purpose of the letter is and importantly that engaging with it can increase their chance of achieving a high FHR.

5 Conclusions and recommendations

The trial letter and accompanying checklist is more 'business focused', by clearly communicating information that would help businesses obtain a high FHR. It utilises the principle of behavioural science to encourage businesses to act on the content, and it is worth noting that FBOs involved in the post-trial interviews felt the letter could help them achieve this. The letter also included a link to BEIS's Business Support Helpline or to Local Growth hubs which can provide financial advice and business support. It is hypothesised that the hubs could help FBOs become more resilient and successful. However, further research is needed to test this.

The behavioural theory, insight and testing used in the development of the trial letter determined that the letter should be no longer than a single side, and that the checklist focussed on the right issues. Insight from interviews with FBOs also demonstrated that additional detail in the letter (what happens next and when is that likely to be, what will I be inspected on, what the FHRS is and how to get a high one) was useful and should be retained. However, further work is needed to encourage businesses to engage with the new correspondence.

Previous Ipsos MORI research²⁵ has identified different ways to encourage consumers to engage with energy supplier correspondence including personalisation, branding, communicating urgency and immediacy, and colour on the envelope. While the correspondence in this trial was personalised, the focus was on improving the content of the letter/email itself. In terms of opening emails, the same research found that: 'the subject line is significant because it and the identity of the sender, are the only means of persuading consumers to open emails'.

Therefore FBOs might be persuaded to open correspondence if 'IMPORTANT FOOD SAFETY INFORMATION' or similar, was added in the subject line (of an email) or on the envelope (of a letter), indicating it's content. The use of the FSA's Food Hygiene rating scheme 0 to 5 logo might also be helpful as it is easily recognisable, including for those FBOs that struggle to read English as it is highly visual in nature. In addition, highlighting that the content could help businesses achieve a high Food Hygiene Rating (FHR) could encourage them to open the letter or email.

Department for Health research found that prompting patients about forthcoming appointments, led to less appointments being missed. This principle could be applied in the context of food businesses. An acknowledgement email and / or text message sent by LAs after receiving a registration form is an opportunity to prompt the FBO to look out for further food safety information.

 $^{^{25}}$ https://www.ofgem.gov.uk/ofgem-publications/39464/prompting-engagement-and-retention-written-customer-communications-pdf

6 Appendix

This contains the following documents:

- Discussion guide for depths interviews with FBOs pre-trial FBO information needs
- Draft correspondence used in the pre-trial FBO RAP interviews
- Discussion guide for depth interviews with FBOs pre-trial FBO RAP interviews
- The trial intervention: LA letter/email and checklist, annotated to show how behavioural insights were incorporated into the design.
- Discussion guide for depth interviews with FBOs post trial interviews with FBOs in the treatment group.

Information needs guide

Understanding Food Business Operator (FBO) Information needs in order to be compliant

- This is a first draft of a series of questions to be put to food business owners / managers that were registered within the last twelve months. Given the data collection relies on the audience being able to recall their information needs and whether or not they were met we suggest we do not speak to businesses who registered before this date. However, even with this cut-off date we anticipate that recall could still be an issue, therefore we will use a process map to highlight the process they went through and later in the conversation ask them to comment on the advisory letter sent to food businesses in that area, where appropriate. Both the process map and area-appropriate letter will be sent by email in advance of the call.
- We will be conducting c.8-10 interviews, lasting c.30-40 min. They will be over the phone unless the business is located in London and the surrounding area.
- The output of the interviews will help to inform the development of the re-designed letter.

INTRO/ SECTION

Explain background:

- FSA and BEIS want to improve compliance among newly registered food businesses, and make it easy to comply without changing the regulations
- Ipsos MORI will trial new correspondence with newly registered food businesses to see if this improves compliance
- To help us design the new letter we are interviewing food businesses that have already been through the registration process to understand your information needs
- Will take 30-45 mins. Incentive offered

Ground rules

- Ipsos MORI are independent of FSA/ BEIS so please be as open as possible. We are not checking up on them
- Everything we find and report will be anonymised and data will remain confidential and destroyed 6months after project completion.
- Confirm participant is happy to take part in the research and remind them they can withdraw at any time i.e. voluntary participation
- Ask if they have any questions before starting interview.
- Ask for permission to record.

SECTION 1: Background (5m)

Can you tell me a bit about your business? E.g. type of business, opening hours (including if these are seasonal), number of staff, location.

Prior to setting up the business...

What did you know about setting up a food business?

What did you know about the registration process?

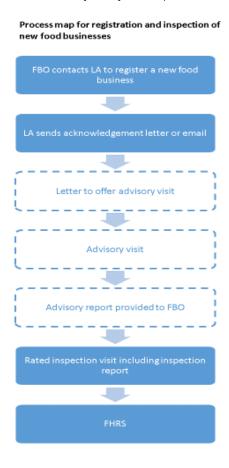
What did you know about demonstrating compliance with food law?

What were your aims for the business? [e.g. to make money, support family, make good food]

SECTION 2: Views on the processing of registering food business (5-10m)

Can you tell me about your experience of the registration and inspection process?

How closely did your experience match that outlined in the process map



What, if anything, was difficult / challenging about the process?

What, if anything, did you not know that you wish you had known at the time?

- Specifically, was there anything that you wish you had known
 - o About preparation for the advisory visit?
 - o about compliance with food law?

SECTION:3: Receiving correspondence (5-10m)

We would now like to focus on the third step of the process – the letter – or some form of correspondence (could also be a checklist or advice pack and/or leaflet) - to offer an advisory visit.

You should have an example either of the correspondence you received or of something like it...

Do you recall receiving correspondence to offer an advisory visit?

What do you remember about it?

How did the correspondence make you feel?

What format did you receive it in?

How clear were you on how to proceed / what to do next?

What did you do as a result of the correspondence? (Contact LA; visit relevant website e.g. LA or FSA; other)

How helpful did you find the correspondence?

- How helpful was it in terms of preparing for the advisory visit?
- How helpful was it in supporting compliance with food law?

SECTION 4: Improving to LA correspondence (advisory letter) (5-10m)

Note: Still working with the example correspondence. Interviewer to already be familiar with the correspondence. Interviewer to encourage participant to keep talking if they go quiet (which is likely)

Part 1

I'd like you to review the correspondence and 'think aloud' as you do so i.e. tell me what you think about it as you go, sharing your impressions and opinions.

Part 2Imagine you were about to go through the process of registration and inspection for the first time, what would you change about the correspondence to....

- help businesses prepare for the advisory visit?
- help businesses comply with food law?

What would you change in terms of...

- Content
 - o Key messages
 - How clear are the key messages?
 - How could they be made clearer?
 - o Missing information
 - What other information would be useful to include?
 - o Branding

• Who do you want such letters to come from? Who do you trust? [e.g. FSA, local authority]

• Layout / Design

- o Length
 - Could the correspondence be shorter / more concise?
 - What might be removed?
- o Salience
 - How far does the design help make key messages / actions clear?
 - Links to useful resources e.g. webpages

Mode

o How would you like to receive the correspondence (Letter; Email etc)

SECTION 5: Conclusion (<5m)

Is there anything else you would like to add about the advice or support you received from the LA around the time you were setting up / registering?

Thanks and close. Incentive, hand it over and / or confirm bank transfer

Long RAP letter

LA Logo

LA Address and Contact details

Business details and address

Dear Mr/Mrs Jones (NAME)

Thank you and congratulations! You have successfully registered your new food business.

What happens next?

- Your business will receive a food safety inspection likely to be in the next 4-6 weeks. You will not be told the date of the inspection.
- As a result of the inspection your business will receive a **food hygiene rating**.
- The Food Hygiene Rating Scheme is designed to help people choose where to eat or shop for food by giving them information about the hygiene standards in a food business.
- Watch this video for a simple explanation: http://bit.ly/1SX12qz

What will your business be inspected on?

The inspection will focus on three main areas:

- 1. how you manage and record what you do to make sure food is safe using a system like <u>Safer Food</u>

 <u>Better Business</u> and that staff know about food hygiene rules and follow them.
- 2. **how hygienically food is handled** how it is prepared, cooked, cooled, stored, and what actions are taken to prevent food being contaminated with bacteria like E-coli.
- 3. **the condition of the premises** including cleanliness, layout, lighting, ventilation, equipment and other facilities such as customer and staff toilets.

Good preparation for inspection gives your business the best possible chance of a 5 rating

A food hygiene rating of 5 is good for business and could help you win customers



How do you get a high food hygiene rating?

- Complete the actions in the **food safety checklist** at the end of this letter. These are the key things that the inspector will be checking you are doing and what the food hygiene rating is based on.
- Use a food safety management system like FSA's **Safer Food Better Business**. It is available online http://bit.ly/1UefQ4v

<u>All businesses can get a high food hygiene rating</u>. To get this you must be able to demonstrate good hygiene standards at the time you are inspected. **Use the checklist and go online to make sure you are doing what you need to.**

Good food hygiene is important for the safety of your customers, and it is something they care about. Food hygiene ratings for all businesses are published online: http://ratings.food.gov.uk/

We're here to help and want you to get the best possible food hygiene rating so if you have any further questions get in touch.

We also offer an advisory visit where we can give face-to-face advice on how you can achieve a high Food Hygiene Rating Scheme (FHRS), so if you would like us to visit please ask for one.

Best wishes and good luck with your food business!

[Name of individual / LA contact]

Named individual / LA	Food safety team

Name of Growth Hub / Local Enterprise Partnership-

For support to grow your business, from developing your growth plans to accessing finance or considering new markets, we can help provide the right solutions based on your needs.

Named individual

Contact details

Short RAP letter

LA Logo

LA Address and Contact details

Business details and address

Dear Mr/Mrs Jones (NAME)

Thank you and congratulations! You have successfully registered your new food business.

What happens next?

- Your business will receive a food safety inspection likely to be in the next 4-6 weeks. You will not be told the date of the inspection.
- As a result of the inspection your business will receive a food hygiene rating.

What will your business be inspected on?

• The inspection will focus on three main areas: i) Management of food safety iii) Hygienic food handling iii) Cleanliness and condition of the premises

Good preparation for inspection gives your business the best possible chance of a 5 rating.

A food hygiene rating of 5 is good for business and all businesses can get a 5 rating.



How do you get a high food hygiene rating?

- Complete the actions in the food safety checklist at the end of this letter.
- Use a food safety management system like FSA's **Safer Food Better Business**. It is available online http://bit.ly/1UefQ4v

Not preparing for inspection may reduce your chances of a 5 rating. We don't want you to regret not preparing so please review the checklist and go online.

We're here to help and want you to get the best possible food hygiene rating score so if you have any further questions just get in touch.

Best wishes and good luck with the inspection,

[Name of individual / LA contact]

[FURTHER CONTACT]INFO

Named individual / LA	Food safety team

RAP checklist

Food safety checklist - how to achieve a good food hygiene rating?

Here are some tips to help you achieve a good hygiene rating. If you answered 'don't know' or 'no' to any question, you need to address this. In the checklist write down what you are going to do and who is going to do it. Don't forget that your score will be based on what is seen on the day of a visit – so it is important you maintain good standards at all times.

	Yes / No /	What action will
	Don't know?	be taken?
1. how you manage risk and record what you do to		
make sure food is safe		
 Food safety management system (FSMS) 		
A documented FSMS is used e.g. Safer Food Better Business		
Regular checks are carried out to make sure we manage risk		
and we record these checks e.g. in the SFBB diary		
Training		
Staff have received food hygiene training and/or adequate		
instruction and supervision and we have records to prove this		
Staff understand our FSMS and follow the good food handling		
practices that we have set out		
Staff know when and how to wash their hands properly		
Staff wear clean work clothing and/or over clothing		
Staff know that if they have diarrhoea and/or vomiting they		
must not return to work until 48 hours after symptoms cease		
2. how hygienically food is handled		
Temperature control		
The temperature of cold food storage is checked daily		
Checks are made to ensure all foods are thoroughly cooked		
Cooked food, that is to be stored cold, is chilled quickly		
Food being held hot is kept above 63°C		
All prepared food is labelled with a use by/throw by system		
 Cleaning and hand washing 		
A cleaning schedule is in place and complied with		
Suitable cleaning products and cloths are used		
Food preparation surfaces, hand contact surfaces (e.g. fridge		
door) and equipment are cleaned and disinfected regularly		
A separate basin for hand washing hands is provided and is		
equipped with hot and cold water, soap and paper towels		
Cross contamination		
Raw and ready to eat foods are stored separately		
Separate, identifiable equipment and surfaces are used for		
preparing raw and ready to eat foods		
3. the condition of the premises		

Structure and pests	
The floors, walls and ceilings are clean and in good repair	
There are sufficient sinks, with hot and cold running water, to	
wash food and clean/disinfect equipment	
The premises is proofed against pests such as rodents and	
flies	
Regular checks are carried out for signs of pests - there is no	
evidence of pest activity	

RAP discussion guide

Discussion guide for usability testing interviews – BEIS / FSA CforC RCT First draft - 131216

Explain background:

- The FSA and BEIS have designed a letter that will be sent to FBO's after registration of the business and before a food safety inspection
- We want to get your feedback on two versions of the letter to try and develop the best possible version
- This will take about 45 mins

Ground rules

- Ipsos MORI are independent of FSA/ BEIS so please be as open as possible. We are not checking up on them
- Everything we find and report will be anonymised and data will remain confidential and destroyed 6 months after project completion
- Confirm participant is happy to take part in the research and remind them they can withdraw at any time i.e. voluntary participation
- Ask if they have any questions before starting interview.
- Ask for permission to record.

Procedure

- Order of documents to be alternated for each interview
- Participants to complete all sections for each document in turn
- Participants to be asked at the end which document they prefer

Qualitative

Section 1: Think Aloud

I'd like you to review the letter and 'think aloud' – share impressions, opinions, thoughts about the letter - <u>as you read.</u>

It may feel a bit weird at first but give it a go.

We find this is a helpful way to understand how people engage with communications.

[If participant goes quiet, then remind them to 'think aloud']

Section 2: Reflections

- What are your **reactions** to the document? [Allow for spontaneous throughout and then picking up on what's already been said (in section 1) or elicit reactions if nothing has been said].
 - o What do you think about the format?
 - Presentation
 - Layout
 - Design
 - o What do you think about the content?
 - Language
 - Readability
 - Message (clarity)
- What, if anything, would you **change** about the document?
- What are the **key messages** from this document?
 - o Could you tell me what it is businesses will be inspected on?
 - o Could you tell me how to get a high good hygiene rating?

Quantitative

Imagine that you have received this letter and will be receiving an inspection in the coming weeks...

Section 3: Usability

Usability Items	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
	(1)	(2)	(3)	(4)	(5)
I think that I would refer to this document frequently prior to inspection					
I found this document unnecessarily complex					
I think this document would be easy to use					
I think that I would need the support of a					
food hygiene expert to be able to use this					
document					
I think the various features of this					
document (boxes, graphics, checklist) fit					
together well					
I thought the formatting of this document was too inconsistent					
I would imagine that most people would					
learn to use this document very quickly					
I think this document would be difficult to					
use					
I would feel confident in using this					
document (to prepare for a food safety					
inspection)					
This document does not provide me with a					
better understanding of how to prepare					
for a food safety inspection					

Section 4: Behavioural Predictors

Motivation & Capability Items	Strongly disagree	Disagree	Disagree somewhat	Neither agree nor disagree	Agree somewhat	Agree	Strongly agree
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
I intend to use							
this document							
to prepare for							

food safety				
inspection				
I want to use				
this document				
to prepare for				
food safety				
inspection				
I am better				
equipped for a				
food safety				
inspection as a				
result of this				
document				

Section 5: Preference Once each participant has completed sections 1-4 for each document ask them to consider documents together.

- Which document do you prefer? Why?
- Which document do you think will be more effective in getting FBO's to prepare for food safety inspections?

Thank and close. Hand-out incentive.

Final intervention correspondence annotated with description of how behavioural insights were incorporated into the design ²⁶



Good Eaton Council Food Safety Team Market St, Spoddington TT2 1NY 01928 768925

Ms Sylvia Patterson
Dino's Trattoria, Grubb Street
Spoddington

Dear Ms Patterson

Congratulations, you have successfully registered your new food business.

What happens next

- Your business will receive a food safety inspection and you will **not** be told when it is.
- As a result of the inspection your business will receive a Food Hygiene Rating.
- **Food Hygiene Ratings** are published online at **food.gov.uk/rating** where you and your customers can view your rating and those of your competitors.
- **The Food Hygiene Ratings** help customers choose where to eat or buy food <u>high ratings are good for</u> business.

What you should do now

- 1. Use the <u>Food Safety Checklist</u> at the end of this letter to prepare for inspection of: your management of food safety; hygienic food handling; and cleanliness and condition of your premises.
- 2. Use a **Food Safety Management System like** the <u>Food Standards Agency's Safer Food Better Business</u> to record and manage what you do. It is available online at **bit.ly/1UefQ4v**



Good preparation for inspection gives your business the best possible chance of a 5 rating.

Businesses say displaying a high rating has helped them win more customers – we don't want you to miss out!

Where you can get more help

- Watch the FSA's 'What's behind the numbers' video for a simple explanation of the Food Hygiene Rating:
 bit.ly/2k8ECKE
- For all the advice you need to start a food businesses go online: bit.ly/1ZxnBJJ
- Get food safety advice. Contact:
- Get help on business growth and finance. Contact:

Best wishes and good luck with your business!

²⁶ This letter was also sent as an email using the subject line "You have successfully registered your new food business"

INSERT CONTACT DETAILS IN THIS BOX Food safety checklist This checklist covers the key things you will be inspected on your rating will be based on what is seen on the day of inspection. Yes/ No/ Action to be • If you answer 'don't know' or 'no' to a question, you must put it Don't taken know right. Write down what has to be done and who will do it. Remember, you must maintain high standards at all times! Need help? Contact: HOW YOU MANAGE AND RECORD WHAT YOU DO TO MAKE SURE FOOD IS SAFE TO EAT Food safety management system (FSMS) A documented FSMS is used. Go to FSA's Safer Food Better Business online: bit.lv/1UefO4v Regular checks are carried out to make sure our controls are working and we record these checks e.g. in the FSMS Training Staff have received food hygiene training and/or adequate instruction and supervision and we have records to prove this Staff understand our FSMS and follow the good food handling practices that we have set out Staff know when and how to wash their hands properly Staff wear clean work clothing and/or over clothing Staff know that if they have diarrhoea and/or vomiting they must not return to work until 48 hours after symptoms cease HOW HYGIENICALLY FOOD IS HANDLED Temperature control The temperature of cold food storage is checked daily Checks are made to ensure all foods are thoroughly cooked Cooked food, that is to be stored cold, is chilled guickly Food being held hot is kept above 63°C All prepared food is labelled with a use by/throw by system Cleaning and hand washing A cleaning schedule is in place and complied with Suitable cleaning products and suitable cloths are used Food preparation surfaces, hand contact surfaces (e.g. fridge door) and equipment are cleaned and disinfected regularly A separate basin for hand washing hands is provided and is equipped with hot and cold water, soap and paper towels Cross contamination Raw and ready to eat foods are stored separately Separate, identifiable equipment and surfaces are used for preparing raw and ready to eat foods

CLEANLINESS AND CONDITION OF YOUR PREMISES	
Structure and pests	
The floors, walls and ceilings are clean and in good repair	
There are sufficient sinks, with hot and cold running water, to wash	
food and clean/disinfect equipment	
The premises is proofed against pests e.g. rodents and flies	
Regular checks for signs of pests show no evidence of activity	

Post-trial guide

Intro – 2 mins

NOTE – we will not mention the details of the trial because we think there is a good chance this would bias participants' views. Rather, we will explain that BEIS and FSA are really interested in what FBOs understand about their responsibilities, and the information they need to achieve a high food hygiene rating.

Securing consent

In accordance with Market Research Society Code of Conduct, and the rules for Government Social Research, participation in this interview is voluntary and you can refuse to answer any individual question or to withdraw from the interview at any time.

We will use the answers from this and other interviews with businesses in our report for the FSA and BEIS next year. We may include quotes from you in our report but never in a way that could identify you or your business. When we discuss our findings we will not mention your business by name or describe it in a way that could make it identifiable.

Background - 5 mins

Can you tell me a bit about your business? E.g. type of business, opening hours, number of staff, location.

Before this business, did you work in the food industry? Probe: role / years of experience.

What did you know about your food safety responsibilities (i.e. compliance with food regulations) before setting up your current business?

Where did you get this information from?

As far as you know, how did the LA first become aware that you were setting up a new food business? ALLOW FOR SPONTANEOUS THEN PROBE:

- I registered online/ by post
- I contacted them before registration to understand more about registration
- I contacted them about an inspection
- They contacted me first

After registration – 5 mins

After you registered your food business, did you receive information about the food hygiene inspection?

PROBE for:

- received letter/ email from LA
- received phone call from LA
- visit to premises by LA
- own research online (WHERE?)
- spoke to friends/ others I know in the industry
- spoke to an independent adviser or consultant

Sources of information other than letter -5 - 10 mins

If NOT received letter/ email from LA:

What new information did you learn? PROBE for e.g. how to prepare and sell safe food, financial support

How did you apply what you learned?

How do you think this prepared you for your inspection?

Reactions to the letter – 10 – 15 mins

If DID receive a letter

NOTE – if didn't get a letter or has no recall of detail then participants will not be able to answer the following questions. It should be emailed as directed below – check if they are able to receive this i.e. are they sitting at a computer

Did you read it?

What did the information cover? What were your big take away messages? How did the information make you feel? Concern, confusion, reassured, etc.

What did you think was the purpose of sending the information?

Do you think the letter improved your knowledge of how to get a high rating for your food business? Probe: to keep food safe and comply with the food regulations.

What action did you take after reading the letter? E.g. new processes put in place, explain to your staff what food safety is and how to ensure it?

NOTE: WE HAVE THIS IN SAMPLE, THIS IS TO CHECK PARTICIPANT RECALL -

Now, can I just check if you have been inspected? Do you know what rating you received?

If scored 0-4 what further information would you have needed to get a higher inspection rating?

If scored 5: to what extent was information contained in the letter the reason for this score?

NOTE: The letter can be emailed at this point to refresh participants' memories if they have no recall – if this helps them remember then go back through the previous section as relevant. If not, it can be used as a prompt in the next section.

Improvements to the letter – 5 mins

Do you have any suggestions for improving the letter?

Thinking about the letter you received, what can you remember about: *NOTE – they may have received this a long time ago and find these challenging, but if they seem to have good recall can probe for:*

- Design and layout e.g. colour, use of boxes
- Whether key points clear
- The Tone
- Web site links
- Videos links
- Contact details for LA
- Contact details for the Growth Hub IF YES: Did you contact the growth hub? What about? Was it useful?

Reactions to checklist - 5 mins

You should have also received a checklist with the letter. Do you remember receiving this?

IF YES

What can you remember about it? Was it useful? How?

Do you think the checklist helped to improve your knowledge of how to get a high rating for your food business?

What action did you take after reading the checklist? E.g. new processes, new systems, staff training, etc.

Incentive

Please ask for bank details so we can pay £50 incentive.

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