Evaluation of the
Food Hygiene Rating Scheme and the
Food Hygiene Information Scheme

Stage 1 - Early Implementation Study
Interim Report on Mandatory Display of
Food Hygiene Rating Scheme Ratings
and Food Hygiene Information Scheme
Inspection Results

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Evaluation of the Food Hygiene Rating Scheme and the Food Hygiene Information Scheme

Stage 1 - Early Implementation Study

Interim Report on Mandatory Display of Food Hygiene Rating Scheme Ratings and Food Hygiene Information Scheme Inspection Results

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Executive Summary

The Food Standards Agency has commissioned the Policy Studies Institute to evaluate the Food Hygiene Rating Scheme (FHRS) in England, Wales and Northern Ireland and the Food Hygiene Information Scheme (FHIS) in Scotland.

The FHRS and FHIS are designed to help consumers choose where to eat out or shop for food by giving them information about food businesses’ hygiene standards. They are also intended to encourage food businesses to improve their standards. FHRS ratings/FHIS inspection results are published at food.gov.uk/ratings and businesses are given stickers/certificates and encouraged to display these where their customers can easily see them.

The overall objectives of the evaluation are to understand how the schemes are operating, to assess the impacts of the FHRS/FHIS on consumers, food businesses, local authorities, food hygiene compliance and public health, and to offer explanations of how and why impacts are occurring. There are two parts to the evaluation: a process evaluation and an impact evaluation.

This report presents interim findings from the first stage of the process evaluation. It focuses on the question of whether food businesses should be required to display their FHRS rating/FHIS inspection result at their premises.

Views on the mandatory display of FHRS ratings/FHIS inspection results were explored in interviews with local authority food safety team managers and staff, interviews with food businesses and focus group discussions with consumers.

Key findings

Support for mandatory display

- Among local authority food safety team managers and staff, as well as consumers, there was strong support for the principle of mandatory display. Many food businesses with higher ratings were also in favour.

- Supporters of mandatory display believed that it would lead to consumers receiving more information about poorly performing food businesses – which rarely display their rating/inspection result at present – and would raise awareness of the scheme generally.

- It was thought that mandatory display might motivate some food businesses to improve hygiene standards – although not the worst performers unless mandatory display led to their losing customers.
**Concerns about mandatory display**

- Some food businesses and consumers did not believe that FHRS ratings/FHIS inspection results were fair guides to hygiene standards. In some cases they suggested that mandatory display would be more acceptable if the stickers showed a breakdown of the rating/inspection result.

- Local authority food safety team staff and managers were concerned about the cost of enforcing mandatory display and the increased number of re-visits which they expected they would have to carry out.

- Practical issues were raised, such as the need for stickers to be visible and ways of informing consumers about ratings/inspection results of take-aways and home delivery businesses.
Introduction

The Food Standards Agency has commissioned the Policy Studies Institute to conduct a process evaluation and an impact evaluation of the Food Hygiene Rating Scheme (FHRS) in England, Wales and Northern Ireland and the Food Hygiene Information Scheme (FHIS) in Scotland. This report presents some of the interim findings from the first stage of the process evaluation. It focuses purely on the question of whether food businesses should have to display their FHRS rating/FHIS inspection result. The full findings from the first stage of the process evaluation will be reported later this year.

Background

The FHRS and FHIS are designed to help consumers choose where to eat out or shop for food by giving them information about food businesses’ hygiene standards. They are also intended to encourage food businesses to improve their standards.

The schemes are run by local authorities in partnership with the Food Standards Agency. Local authorities can choose whether they take part in the schemes. The number of authorities in the schemes is increasing and the Food Standards Agency is encouraging remaining local authorities to adopt the schemes as early as possible.

In FHRS areas, each food business is rated by the local authority’s food safety team when they inspect the business to check that it is complying with food hygiene law. The rating given reflects the inspection findings. A ‘0’ rating means that urgent improvement is necessary. A rating of ‘5’ means that the hygiene standards are very good. The FHIS is similar, but instead of a rating each food business is given one of two inspection results – ‘Pass’ or ‘Improvement Required’.

Food businesses are given stickers/certificates and encouraged to display these where their customers can easily see them but, at present, food businesses do not have to display these. Consumers can also check the FHRS ratings/FHIS inspection results of food businesses on the Food Standards Agency’s website at www.food.gov.uk/ratings.

Aims and objectives of the evaluation

The overall objectives of the evaluation are to understand how the schemes are operating, to assess the impacts of the FHRS/FHIS on consumers, food businesses, local authorities, food hygiene compliance and public health and to offer explanations on how and why impacts are occurring.

The process evaluation comprises a multi-component case study design to explore how the FHRS/FHIS schemes are operating. It aims to gather rich contextual information on early implementation of the schemes and to assess
whether the schemes are, in the longer term, operating as the FSA intended. The core research questions addressed by the process evaluation are:

- How are the FHRS and FHIS being implemented and what implications are there for local authority resources?
- Are the FHRS and FHIS operating as intended by the FSA?
- What are the experiences of the key groups (consumers, businesses, local authorities) that the schemes are attempting to influence?
- What are the perceived changes (consumer/business behaviour, local authority enforcement and related activities) that are emerging as a result of the key target groups’ interactions with the schemes?

The process evaluation is being carried out in two stages: the first stage explores early adoption and implementation of the schemes and the second stage intends to study the longer term operation of the FHRS/FHIS once more established.

When reading this report it should be remembered that the reported findings are from the first stage of the process evaluation. The FHRS and FHIS were new schemes for the areas where fieldwork was carried out and were therefore relatively unfamiliar to most business and consumer research participants, with consumer awareness particularly low.

**Process evaluation stage 1: aims and methods overview**

In this report, the term ‘FHRS/FHIS Adopter’ refers to a local authority which adopted FHRS or FHIS before the end of June 2011. Most FHRS Adopter local authorities involved had adopted the scheme between the official FHRS launch in November 2010 and the end of June 2011. This stage of the research intended to explore implementation and early delivery of FHRS/FHIS and to provide an early assessment of perceptions of the schemes among the key target groups.¹

Fieldwork for Stage 1, primarily qualitative in nature, was conducted between October 2011 and February 2012 and comprised the following elements:

- Interviews with FSA policy staff with responsibility for and oversight of FHRS/FHIS in each country;
- Implementation interviews with local authority food safety managers and inspection staff;
- Desk research including analysis of existing datasets on consumer food hygiene-related behaviour; and
- Case studies of local authorities who had adopted the FHRS/FHIS before the end of June 2011.

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¹ Further details on the research methodology is available on the FSA website: [http://www.food.gov.uk/science/socsci/ssres/foodsafetyss/fs244011/](http://www.food.gov.uk/science/socsci/ssres/foodsafetyss/fs244011/)
In addition to an exploration of implementation issues and perceptions of early delivery, views of mandatory display of FHRS ratings/FHIS inspection results were also explored. In some instances the issue of mandatory display was raised spontaneously by respondents. In other cases, respondents were directly asked about their views of voluntary and mandatory display.

**Focus and structure of the interim report**

This report focuses on one key policy question: should the display of FHRS ratings/FHIS inspection results become mandatory? Research participants’ perspectives on this question were gathered in order to inform policy thinking on the current voluntary nature of the scheme and the possibility of moving to a mandatory regime. This particular issue is being considered at this stage so that the findings may inform the FSA’s current review of the voluntary approach to display. The timing of the review is in line with that set out in Lord Young’s ‘Common Sense Common Safety’ report and follows the public consultation on this issue in Wales.

The report comprises analysis of all responses gathered on this question and is divided into three sections. The first section presents the perspectives of local authority staff; the second covers the views of food businesses and consumers gathered during case study fieldwork. The report concludes with a short discussion on the key emerging conclusions.

A comprehensive assessment of early implementation of FHRS and FHIS will be covered in a later full report of findings from this stage of the evaluation.

**Terminology**

The term ‘food safety team manager’ is used for local authority food safety team members who were identified as holding management responsibilities for the team and acknowledged this during fieldwork.

The terms ‘food safety team staff’ and ‘food safety team members’ refer to environmental health officers and food safety inspectors who did not have management responsibilities.

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Local authority perspectives

Local authority sample

This phase of the research involved understanding adoption and implementation of the schemes from the perspective of food hygiene teams based in FHRS/FHIS Adopter local authorities. In addition, the views of local authorities that had chosen not to adopt the national scheme were gathered.

FHRS/FHIS Adopter local authorities

A purposive sample\(^3\) of FHRS/FHIS Adopter local authorities was drawn from the existing LA database\(^4\) held by the FSA using the following selection criteria:

- Country coverage
- The existence of a previous ‘local’ food hygiene rating scheme
- Urban/less urban local authorities
- Any available information on foodborne illness outbreaks.

These criteria were chosen for the following reasons. It was known that the regulatory and/or historical situation regarding the FHRS/FHIS was different in each UK country. It was expected that experiences and views of FHRS/FHIS might vary according to whether the local authority in question had previously operated a local scheme. It was anticipated that there might be differences between urban and rural local authorities – for instance, because of the presence of many minority ethnic owned food businesses and the higher density of food businesses in some urban areas. It was also thought that local authorities which had experienced major outbreaks of foodborne illness might have different views from those which had not.

In each FHRS/FHIS Adopter local authority the food safety team manager and a food safety team member were interviewed by telephone. They were asked how and why their local authority had adopted the scheme, whether there had been changes in the inspection process or their workload since it was

\(^3\) Purposive sampling is a form of sampling which is carried out with a particular purpose in mind. The main aim is not to generate findings which can be generalised to the wider population, but to identify cases for in-depth study which illuminate the key issues of the phenomenon in question.

\(^4\) The panel dataset, compiled by the Food Standards Agency, contains data about each local authority in the UK. The dataset includes data on statutory notifications of food poisoning, levels of food safety related work, business food hygiene compliance rates and other local authority attributes such as population size, unemployment rates and the type of authority. It will be used to evaluate the impact of the FHRS/FHIS.
introduced, how they thought the scheme was perceived by food businesses and consumers, what they themselves thought of the scheme and what, if any, changes they would like to see. Respondents who did not raise the issue spontaneously were asked whether they thought it should be mandatory for food businesses to display their FHRS rating/FHIS inspection result on their premises.

**Non-Adopter local authorities**

A purposive sample of local authorities which had chosen not to adopt the schemes was also drawn. The sample aimed to cover all countries and included local authorities operating a local scheme. At the point the sample was drawn (October 2011) there were no ‘Non-Adopter’ local authorities in Wales. Since that time, more local authorities have adopted the schemes, which means that views of Non-Adopter local authorities should be considered in their time-limited context.

Interviews with food safety team managers in Non-Adopter local authorities concentrated on the reasons why they had not yet adopted the scheme, whether they had any plans to do so, and whether they thought it should be mandatory for food businesses to display their FHRS rating/FHIS inspection result.

A total of 16 FHRS/FHIS Adopter local authorities and six ‘Non-Adopter’ local authorities participated in the study:

Table 1: Local authority sample breakdown

<table>
<thead>
<tr>
<th>LA Sample</th>
<th>FHRS/FHIS previous scheme</th>
<th>FHRS/FHIS no previous scheme</th>
<th>Non-Adopter</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>FHIRS</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>England</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Wales</td>
<td>2</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>N. Ireland</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>FHIS</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scotland</td>
<td>0</td>
<td>3</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Total local authorities</td>
<td>7</td>
<td>9</td>
<td>6</td>
<td>22</td>
</tr>
<tr>
<td>Total interviews</td>
<td>14</td>
<td>18</td>
<td>6</td>
<td>38</td>
</tr>
</tbody>
</table>

**Case study local authority sample**

The details of the case study sampling strategy are set out in the next section. The case study design involved consultations with one food safety team member in each case study area. Any distinct views expressed by these local authority staff on the mandatory display question have been incorporated into the main local authority staff data.
**FHRS/FHIS Adopter Local Authorities**

This section combines the views of both food safety team managers and food safety team staff.

There was near unanimous support for mandatory display of FHRS rating/FHIS inspection results at food business premises (all respondents referred to stickers not certificates). Only one respondent, a food safety team member, thought that it should remain voluntary. Mandatory display was considered important in order to inform consumers of food business hygiene standards; to boost awareness of the scheme; and potentially to encourage food businesses with a poor compliance record to improve their hygiene standards.

Respondents’ knowledge of voluntary display in their local authority varied but, in FHRS areas, the consensus was that those with a 4 or 5 rating tended to display their sticker and those with a rating of 2 or lower usually did not. They suggested that display of a 3 rating was more varied. In FHIS areas, food safety team staff were of the opinion that those with an ‘Improvement Required’ result tended not to display their inspection result while those with a ‘Pass’ were more likely to do so. These views were based on anecdotal information rather than any systematic study of voluntary display.

Some respondents said that, following an inspection, they usually advised food businesses to display their FHRS rating/FHIS inspection result but could not insist that they did so. Given the current voluntary nature of the scheme, the only consistent source of information on food business hygiene standards is the FSA website. In one local authority, staff tended not to advise food businesses to display their rating/result stickers because they felt that food businesses knew they did not have to display. Mandatory display was expressed as the “missing piece” in the scheme by one food safety team member.

There were no apparent differences in opinion across the FHRS countries or between FHRS and FHIS areas; the exception being the one contrasting voice supporting the continuation of voluntary display.

**Reasons for supporting mandatory display**

*Raising awareness of the scheme*

Generally, respondents thought that mandatory display would strengthen the scheme and increase its profile: ‘I think it can only be a good thing really’.

One food safety team manager said that mandatory display would make FHRS rating/FHIS inspection results as ubiquitous as ‘No Smoking’ stickers, while another commented:

‘We are going to the trouble of issuing [stickers and certificates] ... why shouldn’t the public know? ... I think it would be an excellent idea.’
Clarity and transparency in communicating food business hygiene standards were also cited as important reasons to support enforced display. It appeared that for some the relevance and ‘robustness’ of the scheme hinged on this:

‘... if they don’t display ... it makes a bit of nonsense of it.’

‘These kinds of schemes will only work the way they should if people are forced to put stickers on their doors.’

Local authority staff also made international comparisons, citing Denmark and New York City, where, in their opinion, mandatory display of food hygiene rating results has been a success. Referring to Denmark, one respondent suggested that precise instructions on where to display stickers would be essential:

‘... it’s got to be somewhere prominent at the front of the business really and they have been quite particular about how they want them to display it.’

Informing consumers

The public’s ‘right to know’ about the hygiene standards of food businesses was considered an important reason and it was felt that enforced display would ‘deliver for the consumer’.

It was thought that consistency resulting from mandatory display would increase public awareness of the scheme and help people know ‘what to look for’. One respondent said:

‘consumers are perplexed that display is voluntary ... if display was mandatory then there would be just one rule and non-display would mean that food businesses were breaking the law.’

One view was that mandatory display would help consumers make decisions about which food businesses to visit, especially if some businesses refused to display. Consumers could potentially question non-display:

‘should I really be going into these premises if they are not displaying their sticker and certificate?’

It was argued that mandatory display would help consumers make comparisons based on FHRS hygiene ratings resulting in the decision to choose a higher-rated food business:

‘if people have got a choice between a 3 place, and two doors down the road, they’ve got a 5, they’re going to gravitate towards the 5 I think.’
Others felt that there was a clear case for mandatory display because consumers who did not have access to or were less likely to use the internet would not check the FHRS website.

Influencing food businesses

The relationship between mandatory display of food hygiene information and levels of compliance was discussed by many respondents. Mandatory display was viewed by some as being critical to influencing food businesses with poor food hygiene standards to improve their hygiene standards: ‘I think it would have a huge impact’.

Although mandatory display was seen as a way to potentially improve hygiene standards, some were sceptical and had little expectation that mandatory display would drive up the food hygiene standards of lower-rated food businesses, one food safety team member in a FHRS area said, ‘anything is worth a try if we can get these businesses to even get to a three rating.’ It was referred to as ‘another weapon in [an inspector’s] armoury’ to drive up standards.

Mandatory display was summarised as an important element in changing the behaviour of both consumers and food businesses:

‘a proportionate response to protect consumers and change the behaviour of those poor businesses which have failed to meet their obligations and put consumers at risk.’

One respondent thought that FHRS rating/FHIS inspection result display should remain voluntary, explaining that some food businesses were unwilling to improve standards or struggled to understand the importance of compliance with food hygiene regulations. In such instances, the conclusion was that forcing food businesses to display it would be ineffective in raising food hygiene standards.

Concerns about mandatory display

Although local authority staff expressed support for mandatory display, they raised concerns about the implications of a mandatory approach. The predominant concern raised by food safety team staff was in relation to the impact mandatory display could potentially have on their workload and generally on team resources.

Workload implications

Mandatory FHRS rating/FHIS inspection result display necessitates an enforcement regime to ensure compliance. Respondents speculated that if monitoring and enforcement of mandatory display became the responsibility of the food safety team, it would take time away from their core enforcement and compliance role. Another suggested that monitoring and enforcing display should be the responsibility of trading standards officers.
They also speculated that mandatory display would result in an increase in the number of appeals, re-visit requests, and ‘right to reply’ requests. This would increase pressure on already stretched resources, especially in local authorities where food safety teams have been affected by budget cuts. The possibility of charging for re-visits was mentioned, particularly for higher-rated food businesses, that is, those with a 3 or 4 FHRS rating. On the other hand, another view raised was that frequent re-visits to food businesses with poor compliance were already part of the inspection regime and it was thought that rating/inspection result related re-visits would not place additional pressures on food safety team members’ time and workload.

It was emphasised that mandatory display would result in increased pressure to work within prescribed timescales to conduct routine inspections and respond to re-visit requests, ‘it would definitely increase our workload or the need to get the inspections done more on time’.

Enforcing display and tackling non-display

Respondents believed that mandatory display would require an effective enforcement regime, because otherwise some low-rated food businesses would simply refuse to display their FHRS rating/FHIS inspection result:

‘It’s all very well having these schemes in place and making it mandatory to display stickers but it has to be thought through who is going to enforce it ...

Questions were raised about penalties for non-display. Fixed term penalties were mentioned and one respondent was concerned that if food safety team staff were responsible for enforcement of mandatory display, they would be taking on a ‘traffic warden role’.

If such a penalty were to be put in place, the cost of processing penalty notices and pursuing unpaid penalties was identified as an important issue that needed to be adequately addressed before any mandatory display regulation came into effect.

An increase in complaints from members of the public who noticed non-display and reported it to the local authority was anticipated. It was felt that the time and cost of processing and checking such complaints could place additional burdens on food safety team staff.

Echoing views in support of continued voluntary display, other respondents were convinced that some food businesses would not display their rating or inspection result even under a mandatory regime. Others were concerned that stickers/certificates would ‘be up one day and not the next’ and that regulating display, especially in larger cities with thousands of food businesses, would be logistically difficult.
**Influencing consumer behaviour**

Doubt was expressed about how much mandatory display would influence consumer behaviour. The example of an outlet of a multi-national food business which had received a low FHRS rating was given. In this instance, the poor compliance record of this outlet was covered by the local media but had not had an impact on the food business’ revenues. Other respondents were, however, more convinced that mandatory display of FHRS ratings or FHIS inspection results would help consumers ‘make good, informed choices’ (refer to section above on reasons for supporting mandatory display).

**Non-Adopter Local Authorities**

Views among the small number of Non-Adopter local authorities that participated in the study were generally more supportive of voluntary display. In some instances, this was as a result of concern about monitoring and enforcing of the display. Issues raised were similar to those expressed by staff in local authorities that have adopted FHRS/FHIS, centring on implications for food safety team resources, cooperation of food businesses and penalties for non-display.

Those supporting voluntary display of FHRS ratings or FHIS inspection results spoke about the positive nature of a voluntary scheme, as display would represent a food business’ pride in their level of compliance and perhaps shows an underlying commitment to maintaining or improving their standards. It was felt that this positive demonstration of self-validation would be lost under a mandatory display regime.

Similarly, it was felt that a gradual awareness raising of the scheme through voluntary display would be more effective in driving food business compliance and influencing consumer behaviour change than a ‘hard hitting’ scheme that mandated FHRS rating or FHIS inspection result display.

Staff from local authorities where a local voluntary scheme was in operation emphasised the ‘superiority’ of their scheme. This perception may have been based on comparing FHRS/FHIS with their local scheme as a whole rather than on the relative merits of mandatory and voluntary display.

One respondent clearly supported a mandatory display regime which, in their opinion, would positively influence food business compliance behaviour:

‘poorer [food] businesses would take notice, particularly the kebab shops that frequently change hands.’

Finally, in one local authority, it was felt that their ‘hand was being forced’ and they appeared resigned to the inevitable adoption of FHRS/FHIS by their local authority as well as mandatory display saying, ‘the writing is on the wall’. If given the choice, one could assume that this local authority would preserve the voluntary nature of their local scheme.
Local authority perceptions of food business reactions

Asked about how food businesses might react to mandatory display of FHRS ratings/FHIS inspection results, local authority staff expressed mixed views. A clear distinction between food businesses with better food hygiene standards (described as those with 3, 4, or 5 rating or a ‘Pass’ result) and poor performers (0, 1 or 2 FHRS rating or the FHIS result, ‘Improvement Required’) was made. The general consensus was that only food businesses with a better compliance record would welcome mandatory display.

One respondent explained that some businesses in their local authority already thought that FHRS rating/FHIS inspection result display was mandatory but still did not display. This respondent doubted whether those with a lower rating (2 or below) or with an ‘Improvement Required’ result would start to display under a mandatory regime. These types of food businesses ‘work on the principle that most customers do not even bother to look ...’ and therefore, would not feel compelled to display unless tough penalties for non-display were in place.

Other respondents felt that food businesses would dislike mandatory display but that it would ‘raise a red flag’ and increase compliance because food businesses with a poor compliance record ‘won’t have anywhere to hide’. It appears that local authority staff thought that the fear of losing customers through display of a lower rating/result would drive food business change.

Local authority views - conclusions

Overall, local authority food safety team managers and staff were in favour of modifying the scheme to incorporate mandatory FHRS rating/FHIS inspection result display, considering it to be an important way to raise awareness of the scheme, inform consumers and improve food hygiene standards among food businesses with poor hygiene standards. The possibility that lower performing food businesses might refuse to display their rating/inspection result under a mandatory regime was thought to necessitate an enforcement regime with penalties in place for non-display.

Although supportive of mandatory display, local authority staff expressed concern about the implications of a mandatory regime on their workloads. Anxieties about the role of food safety team staff in monitoring and enforcing mandatory display centred on the availability of resources and time pressures on teams, many of whom have experienced staff reductions in recent years.

It was felt that the details of how and where the rating/inspection result should be displayed for maximum effect would have to be clearly set out. The need to be prescriptive, as identified in the Danish scheme, was emphasised by one respondent.
Case study findings on mandatory display

Case study research methods and sample

The last component in the study of early implementation comprised detailed area case studies selected from the FHRS/FHIS Adopter sample. The aim of this component was to extract in depth information on the early implementation and delivery of the schemes. Additionally, it sought to explore how the schemes were influencing the principal stakeholders.

Six local authority case studies (five FHRS and one FHIS) were selected as follows:

- England – 3
- Northern Ireland – 1
- Wales – 1
- Scotland - 1

Of these, three local authorities had previously operated a local food hygiene rating or award scheme. One large metropolitan area local authority was included in the sample. Case studies comprised desk research on the local area, an interview with a food safety team manager, interviews with food businesses and group discussions with consumers.

Within each local authority, larger towns or cities which were most likely to have clusters of food businesses were selected for fieldwork, so that any possible interactions between food businesses could be investigated. Within each city, localities with a large number of food businesses were identified. These localities comprised either one major road with numerous food businesses or a small area with food businesses located in close proximity to each other across a number of streets.

A purposive sample of food businesses was drawn from data available on the FSA’s rating website (www.food.gov.uk/ratings). Food businesses were selected based on type and their FHRS rating/FHIS inspection result. The sample included restaurants, cafes, takeaways, pubs, small retailers such as butchers and bakers, and a supermarket. In FHRS areas, food businesses rated 0 were excluded. Because of their higher risk category, it was known that these businesses would be subject to significant enforcement activity and have a higher risk of closure. The PSI research team concluded that research participation might be construed as an additional intervention (and a burden) and that their focus during an interview (if they agreed to participate) would likely be on compliance and their interactions with enforcement officers rather than the FHRS.

The sample in FHRS areas intended to focus on food businesses with 1-4 ratings. However, the overall achieved sample comprises a large number of food businesses with a 4 or 5 rating. In one area, this was partly because there were many more of these businesses, but in most cases it was because low-rated premises were less willing to participate in the research. They
tended to be harder to contact, they were more likely to refuse to be interviewed when they were contacted, and they were more likely not to keep appointments if they agreed to be interviewed. As a result, a narrower range of lower-rated food businesses were interviewed than had been hoped for, and this has limited the analysis of that group’s views.

In a small number of cases, lower-rated food businesses had improved their rating under FHRS. One food business with a 2 rating (as identified by the website) had received a 4 in the month preceding fieldwork. Another, originally rated 0, had improved its hygiene standards to receive a 3. In the FHIS area, an equal number of ‘Pass’ and ‘Improved Required’ food businesses were selected along with an example of a food business with an ‘Awaiting Inspection’. An average of eight food businesses in each area participated in the study.

A face-to-face interview was carried out with each food business operator. The topics covered in the interview included: the respondent’s awareness and understanding of the scheme, their experience of the inspection process since the introduction of the scheme, their reasons for displaying or not displaying their rating/inspection result, whether they had changed their hygiene practices as a result of the scheme, their overall views of the scheme, and how they would feel if it were mandatory to display their rating/inspection result.

In each area, two focus groups with members of the public were undertaken. Participants were purposively sampled based on prepared food purchasing and eating out habits as well as socio-demographic criteria in the localities where food business interviews were conducted. Sampling aimed also to capture demographic variation such as age, gender and ethnicity. The ethnic profile of local authorities was derived from neighbourhood statistics (based on the 2001 census and readily available on the internet). The groups were split by participants’ socio-economic status (one group comprising A/B/C1 and the other C2/D/E)\(^5\) to reduce the influence of socio-economic disparities and encourage open discussion between participants. It is to be noted that most participants tended to be in the B-D range with clustering around the C1-C2 SES categories. Focus group discussions were aimed at capturing a range of experiences and views on food hygiene, eating-out and purchasing food and the FHRS in England, Northern Ireland and Wales and the FHIS in Scotland.

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\(^5\) The social grading system derived from the British National Readership Survey was used as this system was familiar to the market-research practitioners who recruited the focus-group participants. Broadly speaking, social grades A/B/C1 refer to higher, intermediate and junior managerial and professional occupations, while C2/D/E refer to skilled manual workers, semi-skilled and unskilled manual workers, pensioners and the unemployed.
The topics covered in the discussions included: how participants decided where to buy food, the role (if any) of food hygiene considerations in that decision, their understanding and use of the scheme (at this point the scheme was explained in some detail), their views of the stickers, certificates and website and the scheme overall, whether finding out more about the scheme had changed their intentions regarding future decisions about where to buy food, and how they felt about the prospect of food businesses having to display their rating/inspection result. (It was made clear to participants that at present food businesses could choose whether or not to display.)

In focus group discussions participants were asked only about the scheme in their area, that is, Scottish participants were asked only about the FHIS and group discussions in England, Wales and Northern Ireland focused on the FHRS. Overall participants’ views on mandatory display were similar across the UK countries and any differences across the FHRS/FHIS areas have been clearly set out.

This section presents the views of food businesses and consumers. All relevant local authority staff views have been incorporated into the previous section discussing local authority perspectives.

**Consumer views**

Generally, participants had little awareness of FHRS or FHIS. Participants associated stickers (and not certificates) with the word display during the discussion on mandatory display. When some participants were shown FHIS certificates, they confused them with food hygiene training certificates. Residents in FHRS local authorities where a previous local scheme had been in operation recalled seeing stickers but also occasionally, certificates on food business premises. In areas where the previous scheme comprised a star rating, participants tended to confuse FHRS ratings with star ratings.

In a few instances, when details of the scheme were explained by the moderator, the question of mandatory display of FHRS ratings/FHIS inspection results was raised spontaneously by participants. At the end of the discussions, participants were asked directly about the issue. The moderator explained (or reiterated) that, at the moment, food businesses could choose whether to display their ratings/inspection results. The moderator went on to say that some people thought they should have to display them, while other people thought the system was fine as it is. Participants were asked for their views on the subject.

Across all the focus group discussions there was overwhelming support for mandatory display. Only a small number of participants thought that display of FHRS ratings/FHIS inspection results should be voluntary. It is unclear whether these contrasting voices were trying to express a viewpoint which intentionally diverged from group consensus or whether they actually thought that display should be voluntary.
There were no apparent differences in opinion in relation to the mandatory display question across the two group types (i.e. lower and higher socio-economic status), by other demographic characteristics (i.e. age, gender or ethnicity), across case study areas, or by FHRS/FHIS countries.

**Support for mandatory display**

Awareness of FHRS/FHIS was low and participants were unsure about the key requirements of the scheme. After details of the scheme were explained and the issue of FHRS rating/FHIS inspection result display was raised, some participants understood that display was not mandatory and said immediately that this was a defect of the scheme. Others asked the moderator whether display was mandatory, and expressed dismay when they were told that it was not. This may also reflect the opinion of some who had assumed that display was already mandatory.

One view was that the absence of a sticker at a food business premises would make them wonder about what the food business was trying to hide. One participant, referring to mandatory display said, ‘I can’t see any reason why it shouldn’t be’.

In one area, participants discussed mandatory display in terms of the cost of implementing the scheme, and one participant, expressing support for mandatory display, emphasised this point: ‘... that’s a pure waste of money isn’t it ... they should be made to do it …’. During another group discussion, participants questioned the relevance of a scheme without mandatory display:

‘if they’re going to go and score it and the place doesn’t have to show it, what’s the point...’.

It was thought that the current FHRS/FHIS design,

‘just sounds a bit bureaucratic and a bit administrative and toothless, so that’s why it’s got to be mandatory’.

**Views on mandatory display and food businesses**

When FHRS was discussed with participants they questioned whether food business operators would voluntarily display a 2 rating:

‘I don’t think anybody would display something in a cafe or whatever that says ‘improvement necessary’.

Echoing the FHRS view, similar sentiments were expressed in relation to the FHIS ‘Improvement Required’ result which participants felt food businesses would be reluctant to display. Consequently, it was suggested, such food businesses would have little incentive to improve their hygiene standards unless strong enforcement measures were instituted alongside the mandatory display of FHRS ratings or FHIS inspection results.
Participants in one FHRS area with a previous local scheme mentioned noticing stickers issued under the previous local scheme and commented that only stickers of higher scores were prominently displayed on food business premises. In this area, other participants discussed the current voluntary display regime and were convinced that food businesses with lower ratings would not display their FHRS rating/FHIS inspection result unless they were required to do so.

Mandatory display, it was thought, would help drive up food hygiene standards. It was assumed that mandatory display would lead to consumers choosing food businesses with better hygiene standards thus affecting food business sales:

‘well yeah, if their hygiene isn’t good, it should hit them in their pocket, you know, stop people going in’.

Personal experiences also played a role in support for mandatory display. During one discussion, a few participants, including one who reported having had food poisoning from a restaurant, strongly supported mandatory display and suggested a strict penalty for non-display:

‘I would like to see anybody closed down if they’re not displaying it.’

Participants in other groups discussed mandatory display in relation to different types of food businesses and two participants who opposed mandatory display conceded that display of ratings/inspection results in hospitals and schools should be mandatory. Their opinion was that children in schools and patients in hospitals cannot choose where they eat, whereas people going to a restaurant or cafe can look up ratings or inspection results on the internet.

**Mandatory display and consumer choice**

In some instances, participants linked mandatory display with increased consumer choice and understood the impact this could have on improving food business hygiene standards. Emphasis was placed on the importance of the visibility of FHRS rating/FHIS inspection result on food business premises if display became mandatory:

‘There’s no point in doing it [mandatory display] if they don’t have to put it in the window. If they don’t have to put it on the window, people aren’t going to know until they’re actually in there and they’re looking for a certificate somewhere on a massive wall somewhere and you’re just not going to see that’.

In one group discussion the need for additional information alongside mandatory display of FHRS ratings/FHIS inspection results was suggested. With particular reference to how ratings/inspection findings are determined, some participants felt that information on the recommended changes food businesses had been asked to make as well as the timescale within which
they were required to make the changes should be provided alongside the rating/inspection result.

Participants in one FHRS area felt that alongside the mandatory display of hygiene ratings on food business premises, the display of ratings on menus and on food business websites should be mandatory so that off-premise consumers, especially those ordering take-aways could readily access this information:

‘I think you should make it mandatory on the takeaway menus as well, display it on their menus’.

**Concerns in relation to mandatory display**

Across all areas, most of the participants favoured mandatory display, concerns were expressed over the transparency of the FHRS ratings and what the different ratings (particularly the middle ratings) meant in relation to food business hygiene standards:

‘It’s got to be more transparent, we need to understand where we are with the 3 or a 2 ...’

Participants were also generally concerned that the display of a rating/inspection result would not necessarily mean that a food business was maintaining their standards and felt that the display could be misleading or meaningless unless there was frequent monitoring to ensure that standards were being maintained to the level of the rating/inspection result. Lastly, a few participants wondered whether people would bother to look for the rating or inspection result display and suggested that the writing on stickers should be bolder to make them stand out more and increase visibility of the displays.

**Support for voluntary display**

In a few instances, participants felt strongly that the rating display should remain a choice. Some concern was expressed about food business’ food hygiene standards which in this participant’s opinion could quickly lapse after a rating/inspection result had been given out. They felt that it was important for consumers to use their own judgement:

‘at the end of the day ... what the restaurant looks like, by the appearance of staff, if the chairs are grubby, if the tables are grubby, if the floor’s dirty ...’.

During another group discussion, a number of participants viewed mandatory display as unnecessary interference and a step towards over-regulation:

‘I wouldn't want someone coming in my shop, grading it and then us having to put a sticker ...having a rating ... because they'll soon do that for everything if they do’.
Another participant was concerned about the potential damage to small businesses and to local tourism:

‘is it going to become something that’s so important to people that we’re losing business? ... I think if you go to seek out the information, it should be available but I don’t know that the government ... the agencies should have such control on a business’ appearance to people’.

A number of participants (in an FHRS area) said that display should not be mandatory until the scheme was ‘fair’, following a discussion about how the FHRS rating was calculated. They indicated that a lower rating resulting from incomplete documentation was less serious than one due to poor food handling practices and that comparisons between food businesses with the same rating (but for different reasons) would be unfair. Respondents thought that the level of information available from a rating display was insufficient to make like-for-like comparisons.

**Lack of concern about food hygiene**

Objections to mandatory FHRS rating/FHIS inspection result display were raised by those who were least concerned about poor food hygiene (because they thought the risks were exaggerated, for instance) and most sceptical towards the schemes as a whole because they doubted whether the ratings/inspection results were fair reflections of food businesses’ hygiene standards.

**Food business views**

In all six case study areas, food business owners and managers were divided over whether it should be mandatory to display FHRS rating stickers or FHIS inspection result stickers. The participants associated ‘display’ with the word ‘sticker’ and certificates were rarely mentioned. A few were under the impression that it was already mandatory to display the stickers.

**Support for mandatory display**

In FHRS case study areas (i.e. those in England, Wales and Northern Ireland), food business operators who were in favour of mandatory display tended to be those whose businesses were highly rated. In most cases their businesses were rated 4 or 5. As most of the food businesses in the sample fell into these categories no firm conclusions can be drawn, but it would not be surprising if highly-rated food businesses were better disposed than low-rated towards the scheme, because they might feel that it affects them less. In one area with many minority ethnic owned food businesses, some operators of poorly-rated businesses also supported mandatory display. This may have been because they did not know that their businesses had low ratings – some of them had limited English and had been unaware of the existence of the FHRS before the interview.
In the FHIS case study area, there was no apparent link between the FHIS result and views on mandatory display. Respondents who supported mandatory display included operators of businesses which had been assessed as ‘Improvement Required’ as well as those of businesses which had a ‘Pass’ result.

There were no apparent differences between food business type and views on mandatory display.

**Reasons for supporting mandatory display**

Food business operators who supported mandatory FHRS rating/FHIS inspection result display gave three main reasons. First, they believed that it was important for consumers to know if a food business had low food hygiene standards. They thought that consumers were not getting this information at the moment because food businesses with poor food hygiene compliance rarely put up their stickers and consumer awareness of the scheme was low:

‘there [are] a lot of food premises [which] have no idea on hygiene which is quite shocking ... if they don't display they must have a bad rating, but not everyone knows that so that's why in my view I think it's best if it's compulsory'.

These respondents believed that mandatory display of ratings/inspection results would help to raise awareness of the scheme and would lead consumers to ask questions about a food business which displayed a sticker showing a lower rating or an ‘Improvement Required’ result, or did not display the rating/inspection result at all in contravention of the law.

The second reason given for supporting mandatory display was that it might encourage poorly-rated food businesses to improve their hygiene standards, if only because they would risk losing customers otherwise.

Finally, some operators of higher-rated food businesses felt that it was unfair on them not to make poorly-rated businesses display a sticker (and suffer the consequences) while they themselves strived to maintain high hygiene standards. Some saw the sticker as a reward for their efforts and felt that this reward was devalued if the scheme was not seen to apply to everyone.

One food business operator supported mandatory display but thought that food businesses should not have to display a sticker if they were appealing against a rating or had requested a re-visit.

**Opposition to mandatory display**

Food business operators who were opposed, or indifferent, to mandatory display worked in a wide range of food businesses, including some with high ratings. The research team reported that nearly all of them were not displaying their FHRS rating/FHIS inspection result at the time of the interview.
Some of these respondents had businesses which were (or had previously been) poorly rated and were worried about the effect on trade if they were forced to display a sticker. One respondent whose restaurant had recently been upgraded from a 2 to a 4 FHRS rating felt that lower-rated businesses should be given a chance to improve without having to display a sticker, which he feared could drive them out of business.

Some food business operators in FHRS areas objected to mandatory display because they disagreed with the way that the ratings were calculated. They thought that the ratings depended too much on the discretion of individual food safety team staff members, or that there was too much emphasis on structure and documentation. Some felt that the latter problem would not matter so much if the stickers showed a breakdown of the ratings/inspection results into the three categories of food handling, structure and confidence in management.

In one FHRS area the whole food hygiene inspection regime was criticised. It was felt that there was too much attention given to paperwork, which was thought to be difficult for people who struggled with English. Instead of the current system, it was suggested more frequent inspections together with much tougher sanctions for food businesses with a poor food handling record. One respondent suspected that consumers knew very little about the FHRS and that mandatory display would make no difference. (In fact his 4-rated supermarket was displaying a sticker, but he said that his partner had put it up and that he himself would not have bothered.)

**Case study conclusions**

Overall focus group participants seemed to conclude that the schemes were useful for informing consumers and a useful tool to help improve food business hygiene standards. Similarly, food business operators who supported mandatory display felt that display of FHRS ratings/FHIS inspection results would raise awareness of the schemes and help consumers make decisions about where to eat. In FHRS areas, those who supported mandatory display tended to be those whose businesses were highly rated, but this could be due to the higher prevalence of highly-rated food businesses in the sample.

Most participants across all the discussion groups felt that mandatory display of FHRS ratings/FHIS inspection results was important. Food business owners and managers, on the other hand, were divided over whether it should be mandatory to display FHRS rating stickers or FHIS inspection result stickers. There was no apparent association between food business type and views on mandatory display.

The potential effect on food businesses was discussed by focus group participants with some concluding that penalties for non-display would need to be implemented alongside a mandatory regime.
Some food businesses saw the sticker as a reward for their efforts and it might encourage food businesses with a poor compliance record to improve their hygiene standards.

Focus group participants’ concerns with mandatory display related to the interpretation of the FHRS rating/FHIS inspection result. They questioned how the ratings were calculated, the categories where a particular food business scored lowest and the reliability of the rating over time.

In FHRS areas, how the ratings are calculated was a concern also for food business operators who objected to mandatory display. These food business operators thought that the ratings depended too much on the discretion of individual food safety team staff members, or that there was too much emphasis on structure and documentation.

Many focus group participants and some food business operators felt that additional information showing a breakdown of the ratings/inspection results would be helpful.
Mandatory display: conclusions and implications

Support for mandatory display

Among local authority food safety team managers and staff, as well as consumers, there was strong support for the principle of mandatory display, although among both groups there were concerns – outlined below – about how it would work in practice. Many food businesses with higher ratings were also in favour.

Raise awareness of the scheme and inform consumers

Food safety team respondents and consumer focus-group participants generally felt that consumers should know about the hygiene standards of any establishment where they were thinking of buying food. They believed that the FHRS/FHIS was not yet achieving this goal because lower rated/Improvement Required premises rarely displayed their rating/inspection result and consumer awareness of the scheme was low.

It was felt that mandatory FHRS rating/FHIS inspection result display would lead to consumers receiving more information directly (because lower rated/Improvement Required premises would have to display their rating/inspection result) and would raise awareness of the scheme generally, meaning that consumers would pay more attention to the ratings. Consequently, consumers would question any food businesses which did not display their rating/inspection result and compare the ratings/inspection results of food businesses which were displaying their rating/inspection result thus incorporating food hygiene into their food purchase decisions.

Drive food business behaviour change and improve food hygiene standards

It was thought that mandatory display would motivate some food businesses to improve their food hygiene standards. Local authority staff and food business operators thought that well-run businesses which already had reasonable hygiene standards would be most likely to improve. They suspected that the worst performers would be much less likely to respond, unless mandatory display led to their losing customers.

Attention focused on stickers rather than certificates

Respondents mostly referred to stickers rather than certificates whenever they discussed mandatory FHRS rating/FHIS inspection result display. Local authority staff and food businesses assumed that consumers noticed stickers more than certificates, and researchers found many fewer certificates than stickers on display in food businesses, including among those whose owners supported the principle of mandatory display. In all of the focus groups, consumers were more interested in the stickers and talked more about them than about the certificates. Certificates were clearly seen by many
respondents as an irrelevance and were thought to be training certificates in one FHIS area. In view of this finding, if mandatory display were to be introduced, the FSA should consider limiting its scope to stickers.

**Concerns about mandatory display**

**Doubts about whether rating/result is a fair guide to hygiene standards**

Some food businesses (including some with a high rating or a Pass) objected to mandatory display because they thought the scheme itself was flawed. They thought that it placed too much emphasis on structure and documentation, or that it left too much to the discretion of individual food safety team members. Some consumers were also concerned that lower-rated/Improvement Required premises might have been marked down for what they saw as minor infringements relating to structure or paperwork. These food business operators and consumers sometimes suggested that mandatory display would be more acceptable if the stickers showed a breakdown of the rating/inspection result so that consumers could see why a food business had received a poor rating/inspection result.

**Cost of enforcement and re-visits**

Supporters of mandatory display agreed that it would have to be enforced with tough penalties, otherwise many lower rated/Improvement Required premises would not put up their stickers. Food safety team staff and managers were concerned about who would carry out the enforcement as they did not want the burden to fall on them. The cost of enforcement, as well as of the increased number of re-visits which they expected they would have to carry out under a mandatory regime and which would need to be conducted within prescribed timescales, were identified as key resource issues.

**Stickers need to be visible**

Consumers and food safety staff and managers who supported mandatory display said that it was important for the stickers to be visible. Food safety staff and managers thought it would be important to set out clear rules on where the stickers should be displayed.

**Take-aways and home delivery**

Some consumers pointed out that many people buy prepared meals from premises which they never visit. These meals are selected from menus delivered to their doors or from food business websites and ordered over the telephone or on-line. It was suggested that food businesses which offer a delivery service should be required to show their FHRS rating or FHIS inspection result on their menu leaflets or website otherwise consumers who have meals delivered to their door would not know the rating/result of the take-away food businesses unless they asked or chose to pick up their meal.