Food Safety Strategy Template:
Supporting information

ACELG
Australian Centre of Excellence
for Local Government

QUT
Queensland University of Technology

EHA
ENVIRONMENTAL
HEALTH AUSTRALIA

LOGAN
CITY COUNCIL

Redland
CITY COUNCIL

Sunshine Coast
Council

City of
Ipswich

February 2014

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Introduction

A strategy sets out the actions an organisation intends to take to achieve a particular goal, such as improved food safety practices. The development of a strategy allows the organisation to review and improve their existing operations, identify and implement new strategies, prioritise actions and strategically allocate resources to maximise efficiency and effectiveness. Implementing a holistic food safety strategy will help local governments continually improve their performance in this area. To support local governments develop a holistic food safety strategy a **customisable template has been developed as part of the research project 'Food Safety: Maximising Impact by Understanding the Food Business Context'** (more information about the research project is available online at www.acelg.org.au/foodsafety).

The food safety strategy template was developed having regard to existing local government programs and the findings of the research project. As the findings of the research project have informed the development of the template, the research report **'Food s**afety: Maximising impact by understanding the food business **context' (Davies, Brough and Johnstone 201**4) is regularly mentioned in this document and should be read in conjunction with this document when customising the template. It is important to note that qualitative research provides insight into the complexities of issues such as food safety regulation and this understanding can inform the development of effective strategies to advance food safety. However, qualitative research is not intended to provide definitive generalizable findings. Consequently, each Council should ensure they understand their local food business context and customise the information contained in this template to suit.

The strategy template is structured into three sections:

- The council**'s approach to food safety including their compliance policy;**
- Food safety services which includes council**'s internal systems and** programs, services that support food businesses, and services that support the community; and
- Program evaluation which details how the programs that make up the strategy will be evaluated.

This document has been developed to provide additional information, guidance and examples/case studies that will assist local government staff customise the template to develop a food safety strategy for their council.

Tips when using the template

All parts of the template are customisable so that councils can efficiently customise the template, including the adoption of corporate document standards. Sections can be added or removed from the template as appropriate, but the local government should ensure that the document adopts a holistic approach to food safety.

Please ensure that the acknowledgement of the organisations that contributed to the development of this template is maintained.

Hidden text

Explanatory text is provided as 'hidden text' (i.e. can be viewed when developing the template and hidden or deleted prior to publication).

To view/hide hidden text in a Word document:

1. Select the 'file' menu.
2. Click on 'options'.
3. Click on 'display' in the left menu bar.
4. Check the 'hidden text' box to view hidden text or uncheck the box to hide the explanatory text.

Users of older versions of Word may need to use the help function to access relevant instructions for viewing/hiding hidden text.

General information

Where specific information (e.g. the name of the council) needs to be entered in generic text, a grey background has been used. The grey background can be deleted by placing the cursor on adjoining text that has a white background and using the backspace/delete key.

Removing the watermark

The food safety strategy template has a watermark on it to remind users that it is a template and needs to be adapted. This is particularly important if people use an internet search engine and are linked directly to the template rather than first viewing this document and the research report which explain the purpose of the template.

Once the template has been customised to suit your council you can remove the watermark by:

1. Select the 'page layout' menu.
2. Click on the 'watermark' icon.
3. Select 'remove watermark'.

Users of older versions of Word may need to use the help function to access relevant instructions to remove the watermark.

Updating internal references

To improve efficiency and minimise the risk of errors, internal references (e.g. the contents page, the numbering of figures) have been incorporated in the template. **To update figure numbers right click on the number and select 'update field'.**

To update the contents page right click anywhere in the contents list and select **'update field'. If the menu headings have been changed you will be given the** option of only updating the page numbers or updating the entire contents page – to ensure all headings are shown in the contents page choose the option that will update the entire table.

Guidance for completing the template

The following section headings correlate with the headings in the food safety strategy template. Please refer to the information provided below and relevant information in the research report when completing the template.

Executive summary

The purpose of the executive summary is to provide a concise overview of key information in the food safety strategy so that people can quickly understand the purpose and content of the strategy.

The example executive summary can be adapted and information added to suit your council or replaced with alternate text.

Introduction

A generic introduction has been provided in the template. The example introduction includes a brief explanation of the impacts of food-borne illness and the factors that have influenced changes in the frequency and occurrence of food-borne illnesses; a commitment to advance food safety and a brief explanation of how the food safety strategy will help advance food safety.

The example introduction can be adapted to suit your council or replaced with alternate text.

Aims and objectives

Example aims and objectives have been provided in the template. The example text has been designed to be generic and will be relevant to most local governments.

The example aims and objectives can be adapted to suit your council. It is important that the aims and objectives of your council's food safety strategy align with its vision, corporate plan and other key documents (which are outlined in the next section).

Links to council's corporate plan

Explaining how the food safety strategy will support the council to achieve its vision and meet the commitments made in its corporate plan and other key documents will help management, councillors and the general public understand the strategic importance of developing and implementing a food safety strategy. It will also help Environmental Health Officers (EHOs) involved in food safety regulation understand how their daily activities contribute to corporate goals.

The information provided in this section should be concise and easily understood by community members.

> **Example:**
> Ipswich City Council's vision for Ipswich to 2031 and beyond is documented in the 'Ipswich Community Plan I2031'. As shown in figure 1, this long-term community plan is supported by other planning documents (e.g. Council's Corporate Plan and Annual Operational Plans) and by Council's planning and performance review process.
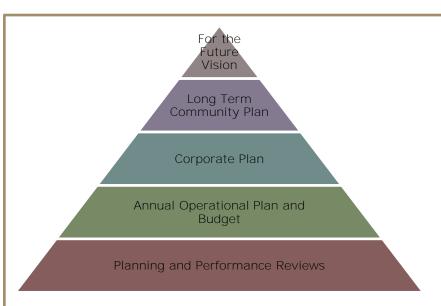>
> cont.

Figure 1: Ipswich City Council's planning framework.

(Source: Ipswich City Council 2013, p.3).

As shown in figure 2, Council has committed to ensuring food businesses are **monitored and action is taken when necessary to ensure the community's** health is not compromised. This action is detailed in the Ipswich City Council Operational Plan 2013-2014 and supports a healthy community (i.e. strategy 5.1 detailed in the Ipswich City Council Corporate Plan 2012-2017). Ultimately all food safety inspections and regulatory action will help protect the **community's health and wellbeing, and is an important strategy that supports** the long-**term vision of 'community spirit and wellbeing' which is one of the** main themes in our long-term vision.

Ipswich Community Plan I2031	Ipswich City Council Corporate Plan 2012-2017	Ipswich City Council Operational Plan 2013-2014
I2031 Theme: Community Spirit and Wellbeing (CSW)	CSW Goal 5: Community health and wellbeing. CSW Strategy 5.1: Healthy community. Action 5.1.4: Ensure food premises are properly set up and regularly inspected to safeguard community health in relation to consumption of prepared food and beverages. Outcome: Food premises are monitored and action taken where necessary to ensure the **community's** health is not compromised.	CSW Action 5.1.4 Task description: Ensure food premises are property set up and regularly inspected to safeguard community health from consumption of prepared food and beverages. Action outcomes: Food premises are monitored and action taken where necessary to ensure the community's health is not compromised. Performance measure: Food premises are properly set up and inspected. Method of measurement: Development compliance audit.

Figure 2: Ipswich City Council goals, strategies and outcomes relating to food safety.

(Information sourced from: Ipswich City Council 2011; Ipswich City Council 2012; Ipswich City Council 2013).

Links to the Customer Service Charter

Many local governments have a Customer Service Charter which outlines the council's commitment to customer service and often also explains the council's expectations of customers.

How the food safety strategy supports the implementation of the customer service charter should be explained.

> ***Example:***
>
> Sunshine Coast Council has detailed its commitment to supporting customers in its Customer Charter which is available via http://www.sunshinecoast.qld.gov.au/sitePage.cfm?code=customer-charter. In the Customer Charter Council has explained what customers can expect from Council and how customers can help Council staff achieve the best outcomes.
>
> The services and programs detailed in this Food Safety Strategy are consistent with the principles in the Customer Charter. In particular, the strategies detailed in this document support courteous, respectful and helpful interactions.
>
> By documenting Council's approach to food safety in this Food Safety Strategy customers are able to access this information and provide feedback.

Our approach to food safety

An example introduction to this section of the food safety strategy has been provided. The example text can be adapted to suit your council.

Food safety laws

The local governments involved in the research project associated with the development of the food safety strategy template are based in Queensland. Consequently, an overview of the Queensland food laws has been provided as example text. Councils in other States/Territories will need to replace the example text with an overview of the relevant food safety laws.

Risk-based compliance

Please refer to pp.42-43 of the research report.

Many government agencies have used risk-based compliance strategies to ensure their limited resources are being used to target the highest risk issues. The steps involved in developing a risk-based approach to compliance are shown in figure 3.

Identifying the risks of non-compliance
What can happen? When and where? How and why?

↓

Analysing the risks of non-compliance
Determine the level of each risk.

↓

Prioritising the risks of non-compliance
Set priorities for addressing the risks.

↓

Identifying and selecting compliance measures
Examine the options and choose the most suitable actions.

↓

Planning for implementation
Plan when and how the compliance measures will be carried out

↓

Reporting and reviewing
Monitor and evaluate the plan to ensure it remains effective

Figure 3: The risk assessment steps involved in developing a risk-based compliance approach.
(Source: The Better Regulation Office 2008, p.4)

Information about risk-based compliance has been provided in the template including why the council has adopted a risk-based compliance approach, how the food safety strategy complements a risk-based compliance approach, the benefits of a risk-based compliance approach and the steps involved in achieving a risk-based approach to compliance. The example text should be adapted to suit your council.

More information about risk-based compliance is available from http://www.dpc.nsw.gov.au/__data/assets/pdf_file/0019/30862/01a_Risk-Based_Compliance.pdf.

Council's compliance policy

Some local governments have a documented compliance or enforcement policy. Council compliance policies should be consistent with the 'Australia and New Zealand food regulation enforcement guideline' (available via http://www.health.gov.au/internet/main/publishing.nsf/Content/foodsecretariat-enforcement-guideline.htm).

An example of a detailed compliance and enforcement policy which incorporates modern enforcement principles is the 'NSW Food Authority compliance and enforcement policy' which is available via http://www.foodauthority.nsw.gov.au/_Documents/industry_pdf/compliance-enforcement-policy.pdf. Councils who need to develop a compliance policy should

review the NSW Food Authority policy, the example from Sunshine Coast Council detailed below and other existing policies.

Some general text has been provided in the template to introduce the council's policy regarding compliance/enforcement activities. This example text should be amended to suit your council.

Example:

Sunshine Coast Council will be firm but fair, objective and professional in carrying out regulatory activities to ensure safe food practices are adopted and the requirements of the *Food Act 2006* are obeyed. Council's approach to food safety regulation is documented in Council's 'Compliance and Enforcement Policy 2009'.

The 'Compliance and Enforcement Policy 2009' documents in a transparent manner how Council will exercise compliance and enforcement actions to protect the community and ensure Council meets its legal obligations. The policy also provides information about Council's expectations of individuals and businesses to ensure ongoing adherence to relevant laws.

The focus of Council's 'Compliance and Enforcement Policy 2009' is on achieving positive community outcomes by implementing the following principles:

- applying proportionality in the application of the law and in securing compliance;
- being consistent in approach;
- displaying transparency in what individuals and businesses may expect from Council if they default; and
- that any enforcement action is considerate of risk. (Sunshine Coast Council 2009, pp.4-5).

The policy notes that a Council officer will consider the risk, costs involved, available evidence, the behaviour of the person, circumstances of the breach and the public interest when deciding what, if any, enforcement action should be taken when breaches of the law are found.

The type of action Council officers may take to ensure laws are obeyed is detailed in the policy. It is noted that generally Council will only prosecute a person/business if there is adequate evidence that an offence was committed, it is in the public interest and one or more of the following apply:

- the offence involves a failure to comply in part or all of a statutory notice;
- there is a history of similar offences;
- the offence has the potential to cause serious consequences for community health, safety, amenity or environmental harm;
- there has been excessive or persistent breaches of legal requirements;
- there has been failure to provide information to Council without a reasonable excuse or a person/business has knowingly supplied false or misleading information; or
- Council staff have been obstructed while trying to carry out their duties. (Sunshine Coast Council 2009, p.8).

To access the Sunshine Coast Council 'Compliance and Enforcement Policy 2009' please visit
http://www.sunshinecoast.qld.gov.au/addfiles/documents/policies/compliance_enforcement.pdf.

Food safety services

This section of the strategy details how council has implemented systems and services that support food businesses to understand food safety requirements and comply with the food safety laws at all times.

Council's systems and processes

Regulatory capture is a risk for all regulatory agencies and is discussed on pp.44-45 of the research report. Local governments need to consider regulatory capture when developing their food safety strategy and incorporate processes to minimise this risk. Such processes should be explained under the following headings.

A separate section on regulatory capture has not been included in the template as the author believed most local governments would not want to draw attention to this risk, possibly diverting attention from all of the positive work the council is doing to advance food safety. However, local governments may insert a section which explains what regulatory capture is and how the council is managing that risk if they prefer.

Accessing information

Please refer to pp.45-46 of the research report.

During the research it was noted that council systems and process may inadvertently create relationships in which a business operator learns to rely on council EHOs to tell them what to do. This may result in the business operator believing they are doing the right thing by obeying the instructions of the EHO, **but the business isn't meeting** the council**'s expectations because they aren't** proactively managing all food safety risks in their business. Councils should carefully read pp.45-46 of the research report and consider if their systems and processes should be amended.

Providing information in readily accessible ways that supports the diversity of the food industry is important. For example, information should be provided in a format that enables people to easily use translation systems and audio systems that will read a document aloud. Council staff should also know how to show people how to use such systems.

When explaining information council EHOs should focus on the desired outcome/s rather than telling a person what to do. Discussing options of how that outcome can be achieved will help the person make a suitable decision without creating a relationship in which the EHO tells the person what to do and they obey (which long-term will not achieve ongoing compliance).

In this section explain how council**'s systems and processes (e.g. accessing** information, application processes, etc.) have been established or amended to support food businesses understand what they need to do and why.

Consistency

Please refer to pp.21-22, 23 and 46 of the research report.

Perceived inconsistency was a significant issue that was frequently raised by food businesses that participated in the study. Real or perceived inconsistencies caused confusion and frustration, as well as a sense of unfairness between competitors. Please read the relevant pages of the research report to understand how perceived inconsistencies are impacting food businesses, the relationship between councils and food businesses, and the relationship between EHOs and food businesses. Many perceived inconsistencies may be the result of poor communication rather than actual inconsistencies. Therefore, effective communication may minimise perceived inconsistencies.

The difference between consistency and uniformity is discussed on p.46 of the research report. It is important that council communications explain the difference between consistency and uniformity and note that council EHOs will implement the requirements of the Food Act in a consistent manner, but what is required may vary between businesses as the type of food being handled, size of the business, etc. varies between businesses.

It is also important to identify internal systems that maximise consistency between EHOs. Such systems may include:

- EHO training to improve consistency during inspections, etc.;
- Scheduled buddying up of EHOs whereby two EHOs occasionally undertake an inspection together to learn from each other and identify potential areas of inconsistency;
- Having EHOs allocated to conduct inspections in a particular geographical area so that the same EHO conducts multiple inspections of a business over a few years (this strategy needs to be balanced with other council priorities);
- Documented standard operating procedures (SOPs) which are consistent with the relevant state documents, for example the Queensland Health publication **'Monitoring and enforcement of the *Food Act 2006*' (available via** http://www.health.qld.gov.au/ph/documents/ehu/32766.pdf) or **the 'Australia and New Zealand food regulation enforcement guideline' (available via** http://www.health.gov.au/internet/main/publishing.nsf/Content/foodsecretariat-enforcement-guideline.htm);
- The use of inspection proformas and templates;
- Recording the basis for uncommon decisions so that similar considerations can be used for future decisions;
- Team discussions about unusual cases;
- etc.

Councils may also participate in groups that enhance regional collaboration. For example, Redland City Council provides the secretariat for the South-East Queensland Food Safety and Public Health Working Group which meets regularly to advance food safety outcomes in a regionally consistent manner. Through this role Redland City Council staff have supported the group to develop a business plan which focuses on high risk and strategic issues. They have also been involved in the development of a number of resources including a guide to assess food **safety supervisor's skills and knowledge in a regionally consistent manner and a** guide for local government on the use of non-reticulated water in food premises.

The South-East Queensland Food Safety and Public Health Working Group have also recently engaged a large corporation to address food safety concerns that were emerging in various council areas. Rather than each council engaging the company, it was considered more efficient and effective to engage the company through the working group.

Communication

Please refer to pp.11-13 (meaning of food safety); pp.15-16 (meaning of compliance), pp.16-18 (relationship with council); and pp.18-22 (relationship with EHO) of the research report.

During the research it was noted that businesses had varying understandings of **the term 'food safety'. How EHOs can influence a business' understanding of food** safety is discussed in detail in the research report.

The term 'compliance' has multiple definitions. Councils want ongoing adherence or conformance to the food legislation by food businesses, whereas some businesses believed they were being 'compliant' by obeying the instructions of the EHO after each inspection. Consequently, councils should ensure that they clearly and consistently communicate their expectations of food businesses to ensure there is a shared understanding. Alternative terms such as adherence and/or conformance may also be used (refer to the discussion on pp.38 and 52 of the research report).

An example of a strategy to ensure businesses understand the council's expectations of them comes from Gold Coast City Council which has implemented on-site introductory meetings. The scheduled meetings occur at the food business within 4 weeks of the operator commencing and take approximately 30 minutes. During the meeting the business operator is able to meet the EHO who inspects food businesses in that area and the EHO explains:

- Council's expectations of food business operators;
- The resources/tools available to the operators to help them meet council's expectations; and
- Obligations of Food Safety Supervisors.

The skills and knowledge of the operators are also assessed during the on-site meeting and the operator can ask the EHO any questions they may have. This type of meeting also has the potential to establish a positive relationship in which the business operator may understand that the council is a source of support and assistance and therefore the business operator may be more likely to seek advice from the council about food safety matters (thereby ensuring the advice is accurate).

Language is a significant barrier for business operators from a culturally and linguistically diverse (CALD) background (refer to pp.13-14 of the research report). Consequently councils should ensure that communication strategies used will be suitable for the diversity of local food business operators.

EHO's skills and knowledge
Please refer to pp.8-10, 13, 18-26 and 46-49 of the research report.

The skills and knowledge of EHOs was found to significantly influence food safety outcomes in the study conducted as part of this research. For example, it was noted that business owners perceive EHOs to be more knowledgeable if they have a good understanding of the food industry and an appreciation of challenges faced by business operators, are able to collaborate with business operators to develop solutions and are able to explain food safety concepts in ways that are easily understood. Conversely, EHOs may be regarded as less skilled and knowledgeable if they are not able to customise advice regarding how legislation can be applied in a specific business. It was also noted that if EHOs can explain why they need to do something and the implications of their actions in the context of food safety, food business operators were more likely to adopt the desired behaviour in the business.

Many perceived inconsistencies may be the result of poor communication rather than actual inconsistencies. Therefore it is critical that EHOs have effective communication skills so that they are able to explain the reasons why decisions have been made without breaching confidentiality requirements.

During the research it was also noted that the focus of EHOs during inspections had a strong correlation with what food business operators believe food safety is or what is important for food safety. Consequently, an EHO's communication during an inspection should focus on the most significant risks. In order to do this

it is essential that EHOs are supported to maintain their technical knowledge including their knowledge about modern causes of food-borne illness, adaptations of micro-organisms and the implications for food safety, food preservation/treatment technology, new types of food (including traditional foods produced by communities that are new to an area and new foods that are produced using new ingredients or new technology), etc.

Inspections

Please refer to pp.24-26 and 48-49 of the research report.

As noted above, the focus of EHOs during inspections has a strong correlation with what food business operators believe food safety is or what is important for food safety. A strong focus on one or two issues during an inspection may effectively **'blinker' the business operator to focus only on those issues, at the risk of ignoring** others. During the study it was noted that if an EHO was able to clearly explain to the business operator the many inter-related aspects of food safety in the business, it appears the business operator is more likely to view food safety on a continuum of inter-related procedures. Consequently, it is important for EHOs to discuss the highest priority food safety risks with business operators rather than potentially just focusing on non-compliances.

During the research it was noted that the focus of EHOs during inspections varied. The use of inspection proformas may support consistency among EHOs as well as encouraging EHOs to focus on the highest risk issues. For example, councils may like to amend existing inspection proformas to separate out high risk issues (e.g. the use of raw egg products, washing of fruit and vegetables, etc.) to remind EHOs to specifically check on these issues during inspections. The addition of a section on the proforma that requires the EHO to identify the highest risk issues in the business may also remind EHOs to focus on these issues and to discuss them with the operator.

If a council collates and uses inspection data to inform future food safety education campaigns, food safety training, etc., this should be explained in this section.

Food safety complaints and food-borne illness investigations

Most food business operators and members of the community do not know how councils investigate food safety complaints or that councils are involved in investigating food-borne illness investigations. It is important that councils promote the important work they do to protect the community and respond to consumers concerns about food safety issues.

The information provided in this section of the template should explain how the council responds to food safety complaints and their responsibilities during investigations of food-borne illness outbreaks.

If a council collates and uses complaint data and the results of food-borne illness outbreak investigations to inform future food safety education campaigns, food safety training, etc., this should be explained in this section.

Targeted programs

Some local governments undertake targeted programs, i.e. programs which target a particular food safety issue or type of food. For example, Gold Coast City Council has undertaken various targeted programs including some for rice products such as sushi, fried rice and cooked rice. Clear objectives linked to compliance with the Food Safety Standards and improved food safety outcomes are set for each targeted program. The targeted programs generally involve three phases:

- Pre-assessment education: A letter introducing the targeted program, explaining why council is focusing on the specific type of food and specific legislative requirements for the relevant food is sent to relevant operators. A factsheet explaining how to prepare the relevant food safely is included with the letter. Some factsheets are available in multiple languages.
- Assessment: A routine inspection of relevant businesses is conducted, with particular attention being paid to high risk issues and matters relevant to the program (e.g. temperature control of cooked rice). Generally an educative approach is taken during these inspections, but enforcement action is taken if necessary.
- Evaluation: Council collects data during the assessment phase, e.g. if the pre-assessment educational material was received, the proportion of businesses that comply with certain requirements, non-compliances noted, etc. Council also gathers data on issues targeted during the campaign such as the **assessment of 'alternative methods' including which alternative methods are** being used, where the alternative methods have been sourced from, etc. This allows council to collate and compare information to identify trends and issues that may warrant further targeted education. In some targeted programs microbiological samples have been taken and analysed for microorganisms that cause food-borne illness and are typically associated with the food being targeted. Samples have been taken before and after the education and assessment to indicate how effective the targeted program was, e.g. there was a significant reduction in the proportion of **samples that were 'unsatisfactory' or 'potentially hazardous' after the education and assessment phases of the** cooked rice and fried rice targeted program.

If your council undertakes targeted programs, the details of such programs should be provided in this section. Information could include which programs have been undertaken in the past, why these programs were prioritised (e.g. there a high incidence of food-borne illness associated with the food) and the evaluation results of the programs; brief details of future targeted programs that the council is planning or how the council will identify priorities for future targeted programs.

Liaison with other organisations
Please refer to pp.49-50 of the research report.

During the research it was noted that it may be beneficial for local governments to work with large corporations to exploit financial and other bonuses to improve food safety outcomes.

As previously mentioned (in the section on consistency) in some areas groups have developed to support regional consistency regarding food safety matters. For example the South-East Queensland Food Safety and Public Health Working Group meet regularly to advance food safety outcomes. The working group provides a forum for member councils to share their best food safety resources, knowledge from projects, etc. By sharing resources and collaborating on new resource development each council is able to maximise what it can offer to food businesses with a smaller investment.

Working with the Chamber of Commerce may also help local governments improve their understanding of the local food industry and the challenges they face. Industry associations that represent particular types of food businesses (e.g. restaurants, caterers, bakeries, clubs, etc.) may also help local governments understand issues and challenges within relevant business types.

It is also important for information about food safety risks to flow quickly from Federal and State agencies to local governments and then onto relevant food businesses (as noted on p.39 of the research report). To facilitate the timely flow of information, it is important that each council has a close working relationship with relevant State agencies, industry associations, etc.

Advocacy for our local food businesses

Please refer to p.49 of the research report.

Often advocacy work occurs without business operators or the community knowing. Understanding how your council supports local food businesses can help strengthen the relationship between the two parties. Promoting the council's advocacy work also helps the community understand some of the less obvious, but important work the council does, which can help improve the council's profile in the community.

In this section explain how your council advocates for local food businesses including how a business can raise an issue. For example, council may report adverse impacts of the food safety legislation to the State health department and advocate for the laws to be amended.

Consideration should also be given to how the council can support local food businesses to comply with food safety laws by advocating on behalf of the business with landlords and other parties which may have power over structural aspects of the business. Alternatively, councils may like to advocate at a higher level and encourage parties involved in establishing lease agreements (e.g. lawyers, real estate agents) to ensure that the landlord is bound to support the business to comply with structural requirements of the Food Safety Standards.

Support for food businesses

All of the council's services and programs that support local food businesses should be promoted in this part of the food safety strategy.

Understanding of the food industry

A deep understanding of the local food industry is essential if councils wants to be able to develop efficient and effective programs that advance food safety. For example, in this research it was noted that if particular actions were not habitual to a person, then their view of their level of compliance was affected (refer to p.49 of the research report). This resulted in several businesses which the relevant local government believed had significant non-compliances describing themselves as compliant. Understanding this type of thought process may help EHOs communicate more effectively with such people and understand the need to work with a business over a period of time to change their norms.

In this research it was noted that businesses respected EHOs that demonstrated an understanding of the food industry context. It was also noted that operators from CALD backgrounds are very vulnerable (refer to p.13 of the research report) and this should be considered by EHOs when interacting with such operators.

For example, several years ago Logan City Council included a language survey on the back of their food business licence renewal forms. Using the licence renewal process to gather this information was cost effective. Each business was asked to nominate the primary language spoken and read in their business, as well as whether or not they were confident speaking and reading English. The language options were presented in English and relevant language. The council added a field to their database to record language information for all food businesses. Consequently, council has been able to accurately identify which languages to present information in. For example, information sessions in English, Vietnamese

and Cantonese were held during the introduction of the Eat Safe Logan food business rating scheme. During the introduction of Eat Safe Logan all food businesses were given posters containing key food safety messages. The posters were available in English, Vietnamese, Traditional Chinese and Simplified Chinese which are the most common languages among food business operators in Logan City. If a different primary language was used in a business, the council EHOs provided a copy of the Eat Safe Logan posters in English and a copy of the World Health Organisation's 'Five keys to food safety' poster in the primary language of the business. This meant that every business received some food safety information in their primary language.

Logan City Council also undertook a survey of over 20% of local food businesses to identify barriers to food safety compliance, their level of knowledge of food safety principles, and their knowledge of council's services to support food safety. Environmental health students undertaking work experience conducted the survey for the Council. The students gained valuable insight into the food industry and were also taken out on inspections with EHOs. Using students to conduct the survey was cost effective and avoided businesses admitting they didn't obey food safety laws to EHOs appointed as authorised persons under the Food Act. The results from this survey have been used to develop resources that meet the needs of local food businesses. For example, one of the findings of the survey was that very few businesses were reading the Council's food safety newsletter; instead they wanted more frequent short food safety messages. Consequently, the Council has developed a series of food safety postcards which provide short messages on key food safety topics.

Business support

Please refer to p.50 of the research report.

Businesses that participated in this research indicated they would like broader support for their business from councils. A business that is financially viable has greater capacity to adopt safe food handling practices as well as positively contribute to the local economy. Therefore councils should explain all the programs they have available to support local businesses in this section.

Council EHOs should be aware of business support programs and should promote them to businesses during inspections, etc. This may help businesses to see the EHO and the council as supporting them to succeed and to comply with the food safety requirements.

Resources for food businesses

In this section of the food safety strategy detail the resources available to food businesses to support them to comply with the food safety laws. The information should include the types of resources available from the council and how to access them, information available on-line and the relevant links, etc. Resources should support industry to develop the skills and knowledge required to comply with the food safety laws and should be accessible to the diversity of the food industry (including people with disabilities, low literacy levels and English as a second language).

For example, Logan City Council has developed a range of tools and resources (many based on resources developed by Brisbane City Council as part of the Eat Safe Brisbane implementation) to support businesses to understand the Eat Safe Logan scheme and to understand key food safety messages. Many resources are available in multiple languages. The Eat Safe Logan forms, tools and resources to assist food businesses are available via http://www.logan.qld.gov.au/laws-and-permits/business-licensing/eat-safe-logan/tools-and-resources-to-assist-food-businesses.

During the interviews conducted as part of the research project, several business operators expressed the desire for the relevant local government to advise them of changes to requirements. This is an important service that the council, potentially in partnership with other organisations (e.g. the local Chamber of Commerce, industry associations, landlords in large shopping centres), should offer as a means of supporting local food businesses. How the council will update food businesses about changes to food safety laws and other important **information may be included in the 'communication' section of the food safety** strategy and/or in this section.

Training

Please refer to pp.10, 13-14, 28-29, 30-31, 37 and 50-51 of the research report.

There are detailed discussions about food safety training in the research report. Some of the key findings are that food safety training should be practical and include scenarios which allow participants to implement the information they have just learnt. It was also noted that it may be beneficial to include information about communication skills to in food safety training for young food handlers so they are better equipped to raise food safety concerns with their manager.

Training for business operators should include information about their role as a role model, setting the workplace culture, etc. and how these issues can influence food safety.

Consideration should be given to how people with disabilities, low literacy levels and people from CALD backgrounds will be supported to develop the food safety skills and knowledge they need to comply with the food safety laws. Many online training programs and programs in a traditional classroom setting may not be appropriate for all food handlers and business operators. Food safety training often needs to be available in multiple formats so that a food handler/business operator can choose the media that they will learn most from. For example, Brisbane City Council is working with a multicultural association to develop culturally informed food safety training.

Young food handlers and food business operators also noted the need for ongoing or refresher training. Cost-effective options for such training should be noted in the food safety strategy and promoted to food businesses.

Incentives

Food business rating schemes
Please refer to pp.27 and 40-42 of the research report.

Food business rating schemes are a market mechanism used to encourage businesses to implement better food safety practices in order to attain a higher rating. Such schemes rely on consumers choosing food businesses based on their rating, thereby placing market pressures on poor performing businesses. Consequently it is important that consumers understand the food business rating scheme.

Brisbane City Council developed and implemented the Eat Safe Brisbane food business rating scheme. More details about the scheme are available via: http://www.brisbane.qld.gov.au/community/community-safety/food-safety/index.htm.

With Brisbane City Council's endorsement Logan City Council has implemented the same scheme, i.e. Eat Safe Logan. The Councils adopted different implementation strategies, but ensured regional consistency by adopting the same scheme. More

information about Eat Safe Logan is available via:
http://www.logan.qld.gov.au/laws-and-permits/business-licensing/eat-safe-logan.

There are strengths and limitations of food business rating schemes. Councils should choose whether or not to implement such a scheme after thorough research. Ensuring EHOs will be consistent in their assessment of food businesses and therefore it is a 'fair' system is critical to the success of a food business rating scheme. Logan City Council managed consistency issues during the implementation phase of Eat Safe Logan by having Senior EHOs attend Eat Safe Brisbane rating inspections with Brisbane City Council EHOs (to reduce the risk of regional inconsistency), and then those Senior EHOs trained all Logan City Council EHOs and subsequently attended EHO rating inspections on an ad hoc basis to ensure each EHO was still rating businesses in a consistent manner. Logan City Council EHOs also discussed specific issues and incidents that they had noted during their rating inspections in team meetings to ensure a consistent approach was being adopted.

Other incentives

The details of other incentives (e.g. reduced licence fees) that the council uses to encourage ongoing adherence to the food safety laws should be promoted in this section of the food safety strategy.

Support for the community

Food safety promotion

Improving consumer knowledge about food safety enables consumers to make informed choices, which in turn can create market pressures that encourage the ongoing adoption of good food safety practices in businesses.

Food-borne illness can originate from food contaminated in domestic homes; therefore, it will not be possible to advance food safety in your area unless the council also educates the general community about food safety.

In this section detail the programs and resources the council uses to promote food safety in the general community. Remember to include activities that occur at specific times, e.g. activities that are undertaken during Australian Food Safety Week which occurs in November each year (more information is available from the Food Safety Information Council website http://www.foodsafety.asn.au/).

Food business rating schemes

If your council has a food business rating scheme, detail how consumers have been educated about how the scheme works and how to use it.

For example, Logan City Council used frequent media releases and other council communication systems to provide regular information to the community leading up to the first release of the publically displayed Eat Safe Logan ratings in local food businesses. The council also promoted the Eat Safe Logan scheme to consumers through an advertisement in local cinemas which featured a local person who had recently been a contestant in a national television cooking program. The cinema ad can be viewed at http://www.youtube.com/watch?v=sediVT8xC7U and the full length video clip (which is also on the council's website) can be viewed at http://www.youtube.com/watch?v=v1WWIsajREw.

Program evaluation

It can be difficult to prove the value of a service that aims to prevent incidents. For example, how do you prove a council program about food safety is the reason there has been a reduction in food-borne illness? However, it is important to evaluate programs to ensure limited resources are being used wisely and programs are actually achieving the desired outcomes. Respected program evaluation techniques can be used to evaluate local government environmental health programs, including those that focus on food safety.

Program evaluation is systematic way of assessing existing programs to determine if services are being implemented as planned; what outcomes are being achieved; if the program can be improved (e.g. improving efficiency, relevancy, reliability, sustainability); and if there are more cost-effective ways of achieving the program goals (CDC 2011).

Some program evaluation resources that may help environmental health managers include:

- 'Program evaluation in environmental health' by the Northwest Center for Public Health Practice at the University of Washington, available via http://www.nwcphp.org/docs/eh_program_evaluation/attachments/PE_print_version.pdf.
- 'Introduction to program evaluation for public health programs: a self-study guide' by the US Centers for Disease Control and Prevention (CDC), available via http://www.cdc.gov/eval/guide/.
- 'Guidelines for evaluation of environmental health services' by Drew, van Duivenboden and Bonnefoy on behalf of WHO Regional Publications, Europe, available via http://www.euro.who.int/__data/assets/pdf_file/0003/98292/E71502.pdf.

A free online course about program evaluation is available via the Northwest Center for Public Health Practice, University of Washington. The course takes approximately 90 minutes to complete. It can be accessed via http://www.nwcphp.org/training/opportunities/online-courses/program-evaluation-in-environmental-health.

In this section the council's approach to evaluating food safety programs and projects should be detailed. It is important that both short and long-term evaluation of programs and projects occurs to ensure the program/project is initially effective and that the program/project has had a sustained positive impact on food safety outcomes. Environmental health managers may need to secure the council's support to undertake program evaluation activities, including securing the budget and other resources needed to undertake such activities. Evaluation activities and costs should be incorporated into any future food safety projects.

The community is genuinely interested in food safety and often don't understand or appreciate the work local governments do. Therefore it may be beneficial for local governments to promote positive food safety program/project evaluation results.

References

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About ACELG

ACELG is a unique consortium of universities and professional bodies that have a strong commitment to the advancement of local government. The consortium is led by the University of Technology Sydney's Centre for Local Government, and includes the University of Canberra, the Australia and New Zealand School of Government, Local Government Managers Australia and the Institute of Public Works Engineering Australia. In addition, the Centre works with program partners to provide support in specialist areas and extend the Centre's national reach. These include Charles Darwin University and Edith Cowan University.

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