

Identifying online display of Food Hygiene Rating Scheme ratings: Introduction

Background

The present situation

The display of a Food Hygiene Ratings Scheme (FHRS) rating is currently mandatory at physical premises in Wales and Northern Ireland (NI).

Legislation for mandatory (online) display is in the process of being drafted. A version of the legislation was drafted in Northern Ireland in 2017, but this fell through due to the suspension of the parliament, and there is now a desire to revisit it to ensure it is fit for purpose. However there are still unresolved questions, such as what constitutes 'online display', and how best to introduce and enforce this requirement, without creating an undue burden on businesses or Local Authorities. An impact assessment has been conducted for rollout of mandatory display (including online) in England. This suggests a cost both to businesses of compliance, and to Local Authorities of enforcement. A [digital discovery](#) conducted last year concluded that mandatory display would be challenging for businesses, and recommended conducting a voluntary pilot first.

To inform policy on mandatory display in Wales and Northern Ireland, the FSA already commissions an annual audit of physical display, and it would be possible to conduct a similar audit of online display. However, a request was made to the Strategic Surveillance team to explore what can be done in house, including a more automated approach.

This project

The overarching aim of this project was to develop an automated solution to understanding the current state of play with respect to food businesses' online presence and the extent and nature of FHRS ratings display. We developed methods of finding websites and retrieving and assessing images, in order to cover a much larger sample than manual research could in the same timeframe, at a much lower cost.

The key question was: what proportion of businesses are displaying an FHRS rating on their online presence? And as supplementary questions, where online display is found, how is it split across nations and business types, what ratings are being displayed, and how are businesses typically displaying their rating?

The work involved in answering these questions can be divided into two main parts: obtaining the website addresses for the establishments (as this data is not collected by the FSA); and then finding and analysing the images on these websites to see if any of them are (or could be) an FHRS rating.

Developing automated methods of answering these questions allows us to do three things:

1. to explore these questions ahead of time, to help inform the drafting of legislation
2. to generate baseline online display figures before any policy intervention, but also an analysis that can be easily re-run at intervals going forward as policy is rolled out

- to build a technological solution that could be developed into a tool in future to facilitate enforcement by identifying businesses that are (most likely to be) non-compliant

Timeline

The project grew out of an initial ‘proof of concept’ piece of work that was carried out in Summer 2019. This phase of development began at the start of February 2021, and ran for three months. Fortnightly checkpoints were carried out with key stakeholders to share developments, resolve questions and ensure development was on an appropriate path. A final ‘show and tell’ event was held at the start of May 2021.

Sample selection

Although there is not yet an agreed definition of ‘online display’, for the purposes of this project a working definition was required. It may be that any future legislation takes a different approach, for example prioritising businesses that sell food online. If this is the case, the analysis sample could be altered for future iterations of the work. Table 1 shows the decisions that were taken during this process.

Table 1: Characteristics included and excluded from the sample

| Dimension | Scope |
|---|--|
| Include presence on an online aggregator such as Deliveroo? | No – we know these already display FHRS rating |
| Include social media pages? | No – business websites only |
| Does the website need to have an ordering facility (‘point of sale’)? | No – any website even if purely informational (‘point of decision’) |
| Include all business types? | No – only restaurants, hotels, takeaways and pubs. Other types would not be expected to have physical display. |
| What about branches of a chain? | Include if the branch has its own page, exclude if the website is just the overall chain’s website |

Once a definition had been agreed, a sample was taken from the [FHRS open data](#). The total sample size was set at 1500, which is the same as the physical audit. The sample was split equally across the three nations, but proportionally by business type (i.e. restaurants constitute around half of the in-scope businesses, so were around half of the sample). The other requirement in selecting the sample was that the establishment needed to have at least a postcode to identify its location, so that its business website could be retrieved (this process is detailed in the next section). However as the analysis was not considering mobile caterers, it is unlikely that this would have resulted in substantial loss. The composition of the final sample is

shown in Table 2.

Table 2: Final sample composition

| | England | Northern Ireland | Wales |
|-----------------------------------|---------|------------------|-------|
| Hotel/bed & breakfast/guest house | 31 | 44 | 52 |
| Pub/bar/nightclub? | 108 | 81 | 122 |
| Restaurant/Cafe/Canteen? | 243 | 253 | 226 |
| Takeaway/sandwich shop? | 118 | 122 | 100 |
| Total | 500 | 500 | 500 |

This composition could be adjusted in any future iteration. It would be very straightforward to include a different subset of business types, or change the relative size and representation of the business types and nations. There would also be some scope to change other exclusion criteria, such as allowing chain websites or Facebook pages (although the latter would present both legal and technical barriers with respect to image retrieval and analysis).