

**Report to
Rapport au:**

**Ottawa Board of Health
Conseil de santé d'Ottawa
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Ward: CITY WIDE / À L'ÉCHELLE DE LA VILLE File Number: ACS2015-OPH-EHP-0002

**SUBJECT: UPDATE ON OTTAWA PUBLIC HEALTH'S FOOD SAFETY
PROGRAM: "OTTAWA SAFE" TRIAL PROJECT**

**OBJET: MISE À JOUR SUR LE PROGRAMME DE SALUBRITÉ DES ALIMENTS
DE SANTÉ PUBLIQUE OTTAWA : PROJET PILOTE « OTTAWA SANS
DANGER »**

REPORT RECOMMENDATIONS

That the Board of Health for the City of Ottawa Health Unit:

- 1. Approve the “Ottawa Safe” online trial project as part of the next phase of the Food Safety Program, as outlined in the report; and**
- 2. Direct staff to report back on the Food Safety Program, including the “Ottawa Safe” trial project in 2017.**

RECOMMANDATIONS DU RAPPORT

Que le Conseil de santé de la circonscription sanitaire de la ville d’Ottawa :

- 1. Approuve le projet pilote en ligne « Ottawa sans danger » dans le cadre de la prochaine étape du Programme de salubrité alimentaire, comme l’indique ce rapport; et**
- 2. Charge le personnel de présenter un rapport sur le Programme de salubrité alimentaire, y compris le projet pilote «Ottawa sans danger» en 2017.**

EXECUTIVE SUMMARY

This report provides an update on Ottawa Public Health’s (OPH) Food Safety Program with focus on the program’s three pillars including: Education; Inspection, and; Quality Assurance. OPH is recommending to the Board of Health to approve an enhancement to the online food safety inspection disclosure as a trial project called *Ottawa Safe*. The proposed trial project will use a system of ‘red,’ ‘yellow,’ and ‘green’ flags online to communicate food premise inspection results - in a more user-friendly and easier to understand format - to the public and food premise operators.

The goal of shifting the current online food inspection disclosure system to *Ottawa Safe* is to improve food safety standards, reduce the risk of food-borne illness, raise consumer awareness of food safety, and recognize businesses that consistently uphold food safety practices. Research shows disclosure systems improve compliance with food safety legislation and enhance food safety standards in food business establishments.

Subject to Board of Health approval, OPH will implement *Ottawa Safe* with an emphasis on education, communication, and quality assurance. This approach will be designed to educate and engage the public and Ottawa’s approximately 5,900 food premise operators on the enhanced Food Safety Program. *Ottawa Safe* will have new elements

added aimed at the public for increasing their understanding of food safety practices, as well as the trial system of food inspection disclosure.

OPH will undertake an evaluation of the online disclosure trial, and table an update report with its findings regarding the *Ottawa Safe* trial in 2017, along with any recommendations for further amendments to the disclosure of food premise inspection information.

RESUMÉ

Le présent rapport vise à faire le point sur le programme de salubrité des aliments de Santé publique Ottawa (SPO) en mettant l'accent sur ses trois piliers, soit l'éducation, l'inspection, et l'assurance de la qualité. SPO recommande au Conseil de santé d'approuver le projet pilote « Ottawa sans danger », une amélioration au système de diffusion en ligne des résultats des inspections de la salubrité des aliments. On propose d'utiliser un système de couleurs (rouge, jaune et vert) en ligne pour communiquer les résultats des inspections des services alimentaires au grand public et aux exploitants de manière plus conviviale et claire.

SPO a décidé de passer du système actuel de diffusion en ligne des résultats des inspections de la salubrité des aliments à « Ottawa sans danger », dans le but d'améliorer les normes en matière de salubrité des aliments, de réduire les risques de maladie d'origine alimentaire, de sensibiliser les consommateurs à la salubrité des aliments et de souligner le bon travail des entreprises qui appliquent constamment des pratiques appropriées. Des études ont montré que les systèmes de diffusion améliorent le respect de la réglementation sur la salubrité des aliments et incitent les services alimentaires à adopter des normes plus rigoureuses.

Sous réserve de l'approbation du Conseil de santé, SPO mettra en œuvre le projet « Ottawa sans danger », en mettant l'accent sur l'éducation, la communication et l'assurance de la qualité. Cette approche vise à renseigner le public et les quelque 5 900 exploitants de services alimentaires d'Ottawa à propos du programme de salubrité des aliments et à les sensibiliser. « Ottawa sans danger », offrira de nouveaux éléments permettant au public de mieux comprendre les pratiques en matière de salubrité des aliments, ainsi que le projet pilote du système de diffusion des résultats des inspections de la salubrité des aliments.

SPO évaluera « Ottawa sans danger », puis présentera en 2017 un rapport d'étape résumant ses conclusions concernant ce projet pilote et formulera des

recommandations de modification du processus de diffusion des renseignements sur les inspections des services alimentaires.

BACKGROUND

To promote food safety, and help prevent, identify, and control emerging food safety issues including food-borne outbreaks, Public Health Inspectors (PHIs) conduct over 14,000 inspections of restaurants, food facilities and food events annually. To build a foundation for successful compliance with required food safety practices at food premises, Ottawa Public Health's (OPH) Food Safety Program focuses on food safety education. During the inspection process, and when observing standard practices are not being followed (with respect to correct food handling and storage, equipment cleaning and disinfection, facility sanitation and employee hygiene), PHIs provide food premise operators and staff with on-site food handler training. OPH also offers a [provincially certified food handler training course](#) and promotes access to online food handler training. In 2014, OPH delivered 100 English, 16 French, one Cantonese and one Vietnamese certified food handler training courses, conferring 2,050 certified food handler certificates. Community Food Advisors, Food Banks and Public Health Dietitians are exempt from paying for Food Handler Training. Other agencies that have partnerships with OPH may request free Food Handler Training which OPH approves on a case-by-case basis.

Quality assurance is also an integral part of OPH's Food Safety Program. Quality assurance works to uphold the program's principles of consistency and predictability, responsiveness, efficiency and effectiveness, to advance food safety in Ottawa.

In May 2014, the Board of Health reviewed an update on the continued progress of OPH's Food Safety Strategy ([ACS2014-OPH-EHP-0005](#)), and information about planned future food safety initiatives. Over the past year, OPH has made strides with the three pillars of its Food Safety Program, including: Education; Inspection, and; Quality Assurance as outlined in Document 1.

Food safety inspection disclosure of food premises was highlighted as a priority area for OPH focus. The Board directed OPH to investigate various food safety disclosure options to enhance transparency and accountability for both the public and food premise operators, in order to ensure the highest possible level of food safety at food premises. Since that time, OPH has engaged with food premise operators, local Business Improvement Associations (BIAs), residents, PHIs, and other Ontario public health units. OPH also reviewed relevant literature in the development of an informed approach to food safety inspection disclosure. This approach will assist OPH to

consistently meet inspection targets, provide clear guidelines to food premise operators, and recognize businesses that meet requirements for food safety practices.

In keeping with its commitment to transparency and accountability, and as part of its Food Safety Program, OPH is proposing an added component to the existing online food safety inspection disclosure system, through a trial project called *Ottawa Safe*. *Ottawa Safe* will be an online resource where food premise inspection information (including enforcement action taken) will be available. The design of *Ottawa Safe* is to promote a better understanding of safe food practices to meet the needs of both residents and food premise operators.

Provincial Context and Developments

According to the Ontario Public Health Standards (OPHS) and the targets in the Public Health Funding and Accountability Agreement with the Board of Health, food premises classified as ‘high-risk’ must receive a compliance inspection once every four months. Food premises classified as ‘moderate-risk’ require a compliance inspection every six months. OPH has consistently met these targets.

The OPHS require that low-risk food premises receive at least one inspection annually. In the past, OPH occasionally took longer than the prescribed 12 month period to inspect low-risk food premises on account of resource constraints and other demands. However, new approaches to increase collaboration with health promotion staff, reallocate staff, and the shift in risk assessments of food premises (outlined below), will ensure that OPH inspects all low-risk food premises each year.

Risk assessments of food premises are conducted on-site on an annual basis by PHIs. In 2015, the Ministry of Health and Long-Term Care (MOHLTC) released a [Guidance Document for the Risk Categorization of Food Premises](#) for local health units to use in assessing risk at food premises. This new guidance tool outlines a standard approach to be used by all 36 local health units in Ontario for the prevention and reduction of food-borne illness in food premises and to support efficient allocation of Board of Health resources.

Prior to the release of the new provincial guidelines, OPH’s stringent standard to setting risk categories resulted in a relatively high number and proportion of high-risk premises in Ottawa compared to peer health units. The approach used by OPH prior to the new provincial guidelines required a large number of scheduled inspections and a significant demand on PHIs to meet inspection targets. With the new provincial guidance tool, a number of food premise ‘risk categorizations’ have shifted, such that many high-risk

premises have been newly categorized as 'moderate-risk,' and a number of premises previously considered moderate-risk are now 'low-risk.'

At the end of 2014 Ottawa had 1,448 food premises categorized as high-risk; and 2,200 as moderate risk. Currently in Ottawa, there are 1,048 food premises categorized as high-risk; 2,439 as moderate risk, and; 1,597 as low risk for a total of 5,884 food premises. These figures vary based on opening and closing of food premises, or change in 'risk' status. The level or degree of risk can change based on inspection history, the nature of food preparation, volume of food produced, inherent food hazards and equipment and facility conditions.

Factors such as a past history of good practice, independent audits of food safety practices and the presence of certified food handlers are now considered during the risk assessments. The new tool will make Public Health Funding and Accountability Agreement targets more attainable and support PHIs to spend time educating food premise operators and staff during inspections.

DISCUSSION

Local Context – Next Phase of OPH Food Safety Program

OPH will continue to advance its Food Safety Program through its three pillars: Education, Inspection, and Quality Assurance.

Education

Based on food industry feedback, and to maximize PHI resources, OPH will work to increase online enrolment in its provincially certified food handler training course, while maintaining in-person courses for priority populations. The roll-out of the proposed *Ottawa Safe* trial will be supported by new approaches to education of food premise staff to underscore the consistent and predictable nature of how food safety practices are recognized and upheld.

OPH also issues seasonal messages and publications including [Food Matters](#) to promote food safety practices to the broader public on topics including safe defrosting methods and barbecues hazards. New interactive elements will be included in the implementation of the *Ottawa Safe* website to highlight the food safety practices promoted by OPH, and the significance of non-compliance with particular requirements. *Ottawa Safe* will serve as a resource to the public, with further information about how to safely prepare food at home.

Inspection

The Food Safety Program has redesigned how work is divided across urban, sub-urban and rural regions in the city, to draw on teams of three to four PHIs that cross-cover each other in a district. This change is designed to promote increased consistency of inspection related decisions between PHIs.

Quality Assurance

Ongoing monitoring for quality assurance by OPH staff includes reviews to ensure food premise owners/operators understand OPH's approach, and that timeliness, accuracy and consistency are reflected in the posting of disclosure results. With the proposed roll-out of *Ottawa Safe*, educational materials will be provided to food premise operators and staff to clearly explain expectations about how to achieve compliance with required food safety practices. OPH will set out what support is provided and what actions are taken when breaches are observed.

Previously, food premises with repeat non-compliance have not been consistently flagged for escalated enforcement action. In 2014, Quality Assurance support to frontline PHIs aimed to maximize their use of current technologies, and development of new strategies and tools. Increased clarity, consistency, and transparency about enforcement actions to food premise operators, members of the public, and PHIs will now be available.

Recommendation 1 - Approve the “Ottawa Safe” online trial project as part of the next phase of the Food Safety Program, as outlined in the report

New Online Food Inspection Disclosure Trial Project – *Ottawa Safe*

The goal of shifting the current online food inspection disclosure system to the *Ottawa Safe* trial is to improve food safety standards, reduce the risk of food-borne illness, raise consumer awareness of food safety, and recognize businesses that consistently uphold food safety practices. Research shows disclosure systems can improve compliance with food safety legislation and enhance food safety standards in food business establishmentsⁱ.

The failure of a food premise operator to meet the required food safety standard is referred to as a deficiency. OPH's current system for disclosure of inspection information online uses only two categories of deficiencies to classify how food premises uphold food safety practices: “in compliance” or “not in compliance.” The current system will be enhanced to provide users with a clear understanding of the

significance of the non-compliance for health, and indication of the history of a food premises' compliance. There are four types of deficiencies that have been developed under the OPH Food Safety Program related to meeting required food safety standards as outlined in Document 2. Using these categories will provide consumers and food premises with a better understanding of the significance of the deficiencies reported.

OPH's current online disclosure system (OttawaRestaurantInspections.ca) displays food premise inspection results in English and French. Visitors to the website can search Ottawa food premises – either by facility name or address – to view the most recent inspections results. This information is used by patrons to make informed decisions on where they dine. OPH uploads inspection results shortly after they are completed. Inspection results remain on the website for two years. The site also features an online complaint/feedback form which OPH monitors regularly to ensure timely follow-up by a PHI.

In 2014, OPH updated its disclosure website to be more easily accessible on users' mobile devices. This change provided users with enhanced access to inspection reports to help them make informed decisions as well as introduced disclosure for personal services settings (such as tattoo, hair salons, aesthetic services, etc.) and recreational water inspections (including pools and spas). Since its implementation in 2014, OPH's updated food safety disclosure website has received approximately 47,380 hits.

To inform the development of an online food safety inspection disclosure trial project that will better meet the needs of the public and food premise operators, OPH undertook a review of food inspection literature and disclosure systems across North America. As part of this process, OPH collected information about systems of disclosure of inspection information from peer Ontario health units. The review showed a variety of disclosure models are being used to communicate food safety inspection results, including: web-based displays of inspection results and 'green, yellow, red' placards; 'A, B, C' grading systems; and a two-tier 'pass/closed' model, among others. The system of using 'red,' 'yellow' and 'green' designations for different food premise inspection results is the most common in Ontario.

While a number of jurisdictions have implemented systems using a similar user interface, there are marked differences among local health units in the supporting category definitions, infrastructure, philosophy, and cost.

Trial Project Design – *Ottawa Safe*

Ottawa Safe will recognize food premises that uphold all food safety requirements and differentiate between premises that do not comply with required food safety standards based on the level of risk to health associated with the deficiencies identified. *Ottawa Safe* will use a made-in-Ottawa approach by using the four deficiency type classification scheme described in Document 2 of this report for each contravention of the food safety standards. *Ottawa Safe* will also present the results of food premise inspections using a colour coded 'red', 'yellow' and 'green' grading system.

Green: Premise has been inspected and is approved for operation by OPH

Yellow: Premise has been inspected and is approved for operation by OPH, but enforcement action has been taken (including violation tickets orders under the *Health Protection and Promotion Act*, and/or court action)

Red: Premise has been closed by OPH and is not approved for operation

The consistent application of OPH's enforcement policy, which focuses on repeat non-compliance for escalating legal action, will underlie the *Ottawa Safe* colour coded food safety disclosure system. The majority of food premises correct deficiencies identified in food safety practice when discovered on the spot and with education about the rationale for the practice. Therefore, the inspection results for most food premises are expected to be associated with a 'green' rating as no enforcement action would have been taken by the PHI. Options for further recognition of businesses that consistently excel at complying with all food safety practices over repeated inspections are being explored. A small number of premises are expected to encounter ongoing challenges meeting food safety requirements and the addition of a 'yellow' rating may be applied to their food premise inspection results. This may serve as an added incentive to improve their performance as 'yellow' indicates legal action has been taken, which operators might be concerned will deter customers from visiting.

As part of the new approach to disclosure, when PHIs determine that a food premise is highly suspected or confirmed to be the cause of a food-borne outbreak based on food samples, stool samples, and epidemiological evidence, OPH will post results of the outbreak investigation on its website. Historically, the number of suspected or confirmed food-borne outbreaks associated with a food premise has ranged between 3 to 5 a year.

In summary, the *Ottawa Safe* online disclosure of food premise inspection information will incorporate four possible designations for each and every contravention of a food safety standard - health hazard deficiency, critical deficiency, semi-critical deficiency, and non-critical deficiency. In addition, each set of inspection results will be flagged red,

yellow, or green based on whether enforcement action was taken. Red will indicate that the PHI ordered that the premises be closed and will align with the PHI having noted at least one Health Hazard Deficiency. A yellow flagged inspection will indicate that the PHI took enforcement action short of requiring that the premises be closed and would typically arise as a result of a PHI issuing a ticket to an operator for failing to correct a deficiency that was noted during the previous inspection. Green flagged inspection will indicate that no enforcement action was taken, although the full inspection results that are posted may indicate one or more deficiencies were noted by the PHI at the time of the inspection.

Implementation of *Ottawa Safe*

With the Board's approval, OPH Food Safety Program staff and PHIs will make the necessary technological adjustments to begin to have inspection results reflected under the new categories with associated colours before the end of the 2015 calendar year. Costs will be accommodated within existing budgets. Prior to "going live" with the inspection report changes online, the "look" of the website will be tested with members of the Ottawa Restaurant Association and potential restaurant consumers and patrons.

Before the launch of *Ottawa Safe*, OPH will send an educational information package to approximately 5,900 food premises by mail, as well as posting the information online, explaining the new approach, including the underlying consistent and predictable enforcement policy. The routine inspections that PHIs make will be used to further explain and educate food premise staff about the trial, and highlight how to provide feedback to OPH about the trial.

Quality assurance processes will be used to ensure inspection results are accurate and the enforcement and disclosure is consistent and predictable.

Communications Approach

The online food disclosure trial project will be accompanied by complementary information package available online and through social media. This information package is designed to educate and engage the public and food premise operators on the enhanced Food Safety Program.

In addition to the educational approach for food premise staff, and as noted above, the disclosure website will have new elements added aimed at the public for increasing their understanding of food safety practices, as well as the trial system of disclosure.

Between June – December 2014, the current disclosure website received 27,462 hits. From January 2015 to present, the current website has received 18,803 hits. Further promotion of the site will be carried out through social media channels. Options to further highlight food premises with outstanding results over time will be explored with BIAs, Chambers of Commerce, and the Ottawa Restaurant Association.

Evaluation of *Ottawa Safe*

OPH will evaluate the *Ottawa Safe* trial against its goals as stated above, based on a one-year period, to ensure that all food premises have been inspected during the trial. All food premises will be given the opportunity to provide anonymous feedback about the system and its implications for their food safety practices and business.

OPH will seek user feedback using online surveys located on the proposed *Ottawa Safe* website. The surveys will include measures to assess the clarity of information provided, such as whether the significance of different inspection results and the colours are easily understood. The survey will also seek to increase appreciation of safe food handling. The findings from these survey results will be further explored qualitatively using focus groups.

OPH will assess compliance with required food safety practices, including whether the proportion of food premises with repeat non-compliance decreases, under the new system compared to the previous one. Attention will be paid to any impact on food-borne outbreaks associated with food premises, though they are small in number each year, as well as on food-borne illness in the population at large.

OPH will monitor and assess the volume of use, and reach of *Ottawa Safe* through website metrics. Staff input will be sought regarding usability of the system and supporting tools, as well as any unforeseen impacts.

Recommendation 2 - Direct staff to report back on the Food Safety Program, including the “*Ottawa Safe*” trial project in 2017

OPH will table an update report with its findings regarding the *Ottawa Safe* trial in 2017, along with any recommendations for further amendments to the disclosure of food premise inspection information, and the Food Safety Program as a whole.

RURAL IMPLICATIONS

There are no rural implications.

CONSULTATION

The next phase of Ottawa Public Health's Food Safety Program, including *Ottawa Safe*, the online food inspection disclosure trial project, was informed by input from restaurant owners and operators, Business Improvement Associations, residents, and City of Ottawa partners.

LEGAL IMPLICATIONS

There are no legal impediments to implementing the recommendations in this report. The need to revise the current inspection website disclaimer and provide additional information on how to interpret online reports when the "Ottawa Safe" online trial project is implemented has been reviewed with Ottawa Public Health.

RISK MANAGEMENT IMPLICATIONS

There are no risk implications associated with this report.

FINANCIAL IMPLICATIONS

There are no financial implications associated with this report.

ACCESSIBILITY IMPACTS

There are no accessibility implications to receiving this report.

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SUPPORTING DOCUMENTATION

DOCUMENT 1: Progress on Ottawa Public Health's Food Safety Programming

DOCUMENT 2: Ottawa Public Health – Types of Food Safety Inspection Deficiencies

DISPOSITION

Staff will implement *Ottawa Safe*, the online food inspection disclosure trial project, upon Board approval of the report recommendations.

ⁱ Sylvanus Thompson, Ron de Burger, Olayemi Kadri, (2005) "The Toronto food inspection and disclosure system: A case study," *British Food Journal*, Vol. 107 Iss: 3, pp.140 - 149