Addressing Cultural Diversity and Food Safety Programs: The Victorian Experience

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Food safety programs have been adopted in Victorian legislation, and have been included in the Australia and New Zealand Food Safety Standards. This study explored the introduction of the food safety program concept amongst Vietnamese food retailers. This paper presents the results of a process evaluation of the “Food Safety Awareness Campaign”, implemented amongst Vietnamese food retailers in Melbourne by a group of local government agencies. The evaluation involved the collection of qualitative data from both a group of Vietnamese food proprietors, and a group of environmental health officers who were involved in the program. The evaluation revealed that there was a general understanding of the program, along with its requirements, by the proprietors. This understanding was attributed to the program being conducted in the workplace, general acceptance of the delivery style and the provision of resource materials to facilitate the food safety documentation. A number of areas were identified that impeded the program, particularly the implementation of program tasks by the food proprietors. These included the need for a greater understanding of food hygiene concepts, issues surrounding cultural acceptability, time, costs, benefits, practicality and sustainability of implementing the program. Recommendations for improving the program included; investigating the recruitment of bi-lingual workers, enhancing the program resource materials, the inclusion of food handling staff in the training programs, and the development of strategies surrounding the promotion of benefits of food safety programs for small business.

Key words: Evaluation, Food Safety Programs, Vietnamese, Qualitative, Training, Food Hygiene

Education of food proprietors to enhance compliance with Food Act legislation is one of the most common tools used by local government agencies (Office of Regulation Review, 1995). The most appropriate way to educate proprietors, and the suitability of the mechanism selected for program implementation, particularly when dealing with groups from a diverse cultural background, are key questions faced by local government agencies in Victoria. This is particularly important given the cultural diversity of the food sector, and due to the introduction of the legislative requirement for food premises to develop a food safety program.

A number of agencies at the local, state, national and international level have conducted trials involving the training of proprietors in small businesses on the concepts of food safety programs. These trials include The Business of Safe Food (BSF) in Victoria, The Pilot Food Safety Project (PFSP) in New South Wales, Food Safety Project (FSP [ACT]) in the Australian Capital Territory, FoodSafe Handler Training Program (FSIP) in Western Australia, and the Implementation of Food Safety Programs in Small Business (FSPSB) in New Zealand (Allman 1996;
Australia and New Zealand Food Authority (ANZFA) 1998; Centre for Public Health 1997; Small Business Professional Development 1998; Victorian Department of Human Services [DHS] & ANZFA 1996). Typically, the interventions include a basic introduction to food hygiene concepts followed by specific training surrounding identification of food hazards based on Hazard Analysis Critical Control Point (HACCP) principles.

Evaluation of these programs has been mostly informal, however, the key findings suggest that there are a number of issues regarding the training and implementation of food safety programs in small businesses. These issues include ensuring the training is ‘hands on’, is relevant, involves management commitment and leadership, and addresses cultural difficulties, (particularly those relating to language and literacy). Barriers to success include the lack of support for record keeping, reluctance to change, and the need for a greater understanding of food hygiene concepts together with linking food safety outcomes to ‘bottom line’ benefits. More positive outcomes were identified as improved relationships with Environmental Health Officers (EHOs) as well as increased consumer confidence, and in some cases perceived increases in hygiene standards (Allman 1996; ANZFA 1998, 1999; Centre for Public Health 1997; Small Business Professional Development 1998; Victorian DHS & ANZFA 1996).

Regardless of the training provided, however, there is still debate regarding the effectiveness of food handler training in achieving increased compliance with legislation and reduction in the incidences of food borne illness. Essentially there has been a call for more evaluation of food hygiene programs. Food hygiene education should examine more closely its operation within the health promotion context in order to achieve sustainable behaviour change among participants, and eventually lead to the reduction of food borne illness.

Traditionally, food hygiene education relies on the knowledge based approach (education and behavioural) through the provision of food hygiene training. It has been described as adopting a ‘KAP model’ (knowledge, attitudes and practice) where individual behaviours or practice are dependent on knowledge and attitudes (Rennie 1995).

Rennie (1995) suggested that the application of a broader planning model, such as Tones’ Health Action Model (HAM), which recognises the influencing factors of skills, knowledge, motivation, environmental support, behavioural intentions, norms, and provides the basis for a more successful approach to food hygiene.

Study Rationale: Evaluation of the Food Safety Awareness Campaign

The research undertook a process evaluation of the ‘Food Safety Awareness Campaign’ conducted for 12 weeks during 1998 by the Victorian municipalities of Greater Dandenong, Yarra, and Maribyrnong, and the Victorian Department of Human Services. The program was developed in response to outbreaks of food poisoning involving Vietnamese food premises in Melbourne during 1997. The aim of the program was to raise the awareness of food safety among the Vietnamese food retailers and introduce the new legislative requirements of the Food Act 1984. The objectives of the campaign were to trial a method of training 150 food proprietors, who were predominantly Vietnamese, on:

- the changes to the legislation; and
- the implementation of a component of food safety programs, documentation, based on identified potential food risks in their food premises.
The program involved:

• pre-evaluation of the premises by the EHO to ascertain current practices and level of awareness in food hygiene

• an onsite consultation with a project officer (qualified EHO) for 2-3 hours to introduce the food proprietor to the changes to the Food Act 1984 and provide training in the implementation of a program based on food handling practices essential to food safety or good manufacturing practices (GMPs). This included training in the monitoring and recording of:
  - deliveries (suppliers' records)
  - temperatures of cooling and heating equipment (temperature control charts)
  - cleaning tasks (cleaning schedule)
  - pest control measures (pest control chart)
  - staff illnesses (illness register).

The program was delivered in English (the project worker was not bilingual) with some proprietors having friends or children present to interpret. Thermometers were made available for proprietors to purchase and a set of documentation and food hygiene support materials, mostly in English, were provided for proprietors to complete on a daily/weekly basis, depending on the nature of the task, for a six-week period. An outcome evaluation by the project worker was also completed. It involved a quantitative measure of whether the documentation was attempted, changed to suit the premises, completed accurately, translated, or recorded in a language other than English.

Method

The key research questions to be explored in this project were:

• What were the proprietor's perceptions and reactions to the Food Safety Awareness Campaign?

• What were the factors that supported and impeded the process?

The focus of the evaluation was a process evaluation (Hawe, Degeling & Hall 1990), based on the principles of the Health Action Model proposed by Tones (1990). This involved examining the areas of program satisfaction, comprehension, cultural acceptability, motivation and ability to implement the program.

Food proprietors

Data was collected through the conducting of structured open-ended, face to face interviews with a sample of 10 Vietnamese proprietors involved in the program (three from each of the respective municipalities). The structured open-ended interview method was selected due to the limited time the participants could be available. It was also believed, as suggested by Rissel, Russell and Mitchell (1992), that there is anecdotal evidence that Vietnamese people have a reputation for wanting to please, and have difficulty saying 'no' directly, which may be pronounced in personal interviews. In some Asian cultures it is also considered impolite to respond negatively to a series of questions. Consequently, a respondent might inaccurately answer 'yes' to some or all closed-ended questions (Metoyer-Duran 1993). The structured open-ended method was therefore selected in an attempt to overcome this problem.

A stratified purposeful sampling strategy was applied in order to select suitable premises (Patton 1990). This involved selecting premises that had been assessed as implementing the program with either
average, above average, or below average competency, as determined by the project worker.

Participants once selected were given the opportunity to be interviewed in either English by the researcher or Vietnamese, by an interpreter. The interview schedule was translated and pre-tested, in both English and Vietnamese, before use (Metoyer-Duran 1993). Responses to interviews with proprietors conducted in Vietnamese were back-translated (Twin 1997). All interviews were analysed using cross interview analysis (Patton 1990). This involved comparing the individual responses of the proprietors to each of the questions posed and developing categories from these responses. The data were then coded, using the method described by Hawe, Degeling and Hall (1990) to enable patterns and themes to be identified.

Project group

Data were also collected by the conducting of a focus group with the project group (project worker and EHOs) to increase the validity of findings through the triangulation of data (Goodwin & Goodwin 1994). The format used was based on the ‘group interview’ technique proposed by Hawe, Degeling and Hall (1990) for undertaking process evaluations. Seven themes reflecting the key areas covered in the interviews with the proprietors were explored.

The data from the workshop was analysed based on the procedure proposed by Hawe, Degeling and Hall (1990). Categories were developed for each of the negative and positive responses to each of the themes already determined for the focus group. These categories were then coded and analysed for emerging patterns. Feedback and discussion with the project group took place to assist in the analysis.

Results

Proprietor demographics

Demographic information regarding the number of years the proprietor had lived in Australia, age, educational status, food hygiene training completed is represented in Table 1.

All proprietors were born in Vietnam. The most common language spoken in the business was Vietnamese, with some speaking Chinese and English. Eight of the group had no formal training in food hygiene, however, two were currently undertaking a short course in food hygiene in addition to the program.

Proprietor: Summary of results

Most participants perceived the program as being ‘good’ and to be about ‘checking and measuring the temperature of food and keeping records relating to food safety’. Even though most participants indicated that they understood the verbal and written instructions of the campaign, knowledge of key terms such as ‘corrective action’ were not understood by most participants. For example, when one proprietor was asked what the word ‘corrective action’ meant, he commented:

I do not understand the word corrective because I do not understand a few Vietnamese words. All OK at the moment, if the fridge does not have the right

Table 1: Demographic information regarding the number of years the proprietor had lived in Australia, age, educational status, food hygiene training completed

<table>
<thead>
<tr>
<th>Participants n=10</th>
<th>Years Living in Australia</th>
<th>Age</th>
<th>Educational Status</th>
<th>Formal Food Hygiene Training</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-10</td>
<td>10-20</td>
<td>25-30</td>
<td>&gt;35</td>
</tr>
<tr>
<td>Male (n=7)</td>
<td>1</td>
<td>6</td>
<td>nil</td>
<td>6</td>
</tr>
<tr>
<td>female (n=3)</td>
<td>nil</td>
<td>3</td>
<td>1</td>
<td>2</td>
</tr>
</tbody>
</table>

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temperature, meaning the food is not at the right temperature so I have to find the person to fix the fridge.

Most participants indicated that they would have preferred the program (both written and verbal) to be in Vietnamese, with some indicating that this would have been better for staff. Some indicated that having formal training in food hygiene helped them to understand the program; with others indicating that they found the charts simple to fill out with practice and after careful reading.

The most common charts filled out as part of the program were the daily temperature charts, then the suppliers' charts, followed by the cleaning charts. The most common difficulties perceived by participants were time to fill out the charts, the inability of staff to assist in the filling out of charts and the checking and recording of deliveries. The practicalities of the tasks for staff in the restaurants to be able to undertake were also raised as well as the relevance of certain activities.

For example, one proprietor commented:

We need more time. We need to train people. One hour or two hours is not enough time. Need to be able to get confidence to do it and understand it. When are they going to do it? We need more time to understand why does it. Lots of people don't understand English like me. Make one very confused, can't read it. Vegetables come in. They drop it and leave it. No time to check. If they tie up this campaign in the restaurant the country go down very bad. The cost of labour to do this is too much. We only have five-dollar dishes and to do this means more people employed.

And

Big difference in Asian and European food. Is very different. We have lots of fresh products not always in freezer. Nearly have a couple of hundred different ingredients. Ordered nearly every day. Hard to record daily everything when we get from suppliers all the time.

Mixed responses were received in relation to suggestions for improvements. Most felt more time was needed to undertake the tasks, but concerns were raised regarding paying staff to do this. The need to translate components of the program into Vietnamese was most commonly raised. Other suggestions included staff training, consolidation of charts into one book and looking at simpler method for the recording of time and temperatures.

Even though some felt the program reminded them how to improve food hygiene, and that undertaking the tasks would be safer for customers, all participants indicated that they had not changed anything in their food practices as a result of the program, perceiving that they already produce safe food. Some felt that they carried out the activity because the government required them to do so.

Project group: Summary of results

The EHOs commonly thought that there were many positive aspects to the program. This included it being voluntary, delivered at the proprietors' premises and flexible in terms of delivery and content. The provision of a thermometer to each of the premises as well as the use of visual aids was also considered positive. The group thought that it provided the opportunity to enhance the relationship between the proprietors and EHOs and in some cases the attempt in documentation by proprietors took place. Positive impacts on food hygiene were observed in some instances, such as some proprietors showing further interest in food hygiene education by enrolling in another food hygiene course.

However, some negative themes arising from the workshop included concerns regarding the sustainability of the program, cultural issues such as perception of correct storage of food and in some cases language and literacy issues.

One EHO commented:

I'm not sure whether they always understood. When one proprietor was asked to take the temperature of the fridge, he pulled out the fridge magnet he had put in the fridge.
The suitability of the program content, particularly relating to the amount delivered, and the relevance of some components, was raised. Lack of motivation or willingness of some proprietors to participate in the program, and the impact the program had on the resources of the proprietors (principally time available to them) and on the participating councils, were also considered as issues.

One EHO commented:

Labor and resource intensive. If this is the level we have to go to, it has huge implications for us and the council.

The suitability of some of the materials provided during the program, particularly the durability of the charts provided to document the food hygiene activities was raised. Many recommendations were made by the group to improve the program. These centred around the need to develop strategies to encourage more receptiveness to the program and participation in program activities, sustainability of the program including the implementation of the tasks and the overcoming of cultural barriers surrounding language and literacy and food storage. A review of delivery to ensure the content matched the needs of the participants ensuring relevancy of the tasks required was recommended, as well as developing a mechanism to measure impacts successfully.

**Discussion**

**Limitations of the study**

Time constraints and the use of standard open-ended questions as a method of qualitative inquiry limited the ability to explore participants’ perceptions of certain aspects of the program in greater detail. For example, when answering questions regarding the storage of food, it would have been helpful to more fully explore these perceptions.

Even though the interview was pre-tested, the wording of some open ended questions did not always produce a direct answer to the question which indicated that some interviewees might not have clearly understood the question. Possible bias may also have been introduced when asking participants certain questions regarding knowledge of food hygiene terms. Other sources of information, such as previous training in food hygiene, may also have assisted interviewees in answering these questions.

**Meeting program objectives: key outcomes**

Based on pre- and post inspection visits carried out by the EHOs during the program, the EHOs considered that, amongst the more willing or interested proprietors in the program, there appeared to be a raised awareness and in some cases, minor improvements in their hygiene practices. The project worker also provided anecdotal evidence regarding positive improvements (Kelton 1998). The EHOs, however, considered that among less willing or less interested proprietors, no changes were observed, including little or no attempt at documentation.

These perceptions need to be viewed with caution due to:

- the pre- and post inspection visits not measuring the degree of change
- limitations associated with anecdotal evidence
- the possibility of improvements in food hygiene being made as a result of other factors rather than the training itself (e.g., visit by an authority).

In addition, the EHOs raised the issue regarding the difficulty of measuring change as a result of the program and the need to develop better indicators to assist in this process. Other studies also have highlighted the difficulty of linking improved food
hygiene to specific food training programs although increased knowledge may be observed (Telbut 1992).

All proprietors indicated that they had not changed anything in their food practices as a result of the program, perceiving that they already produce safe food (although one felt that it reminded him how to improve food handling at his premises and he gave ‘tighter’ attention to management). Even though this response could be expected, given that the proprietors would be keen to promote their competencies in the area of food safety, it does raise questions regarding the actual impact the program had on food handling practices at these premises and the need to examine aspects of program implementation further.

Participant satisfaction and implementation of program activities
The general response to the program by the proprietors was positive; with most considering that the instructions concerning the program requirements were clear. The EHOs particularly considered that the workplace was a suitable venue for the training session due to its convenience and familiarity to the proprietors and because it enabled the demonstration of concepts in the workplace. In the case of proprietors who have low language and literacy skills, demonstrating the concepts in the workplace has the advantage that it enables the provision of visual stimuli to help explain concepts (Harmer 1991).

The main factor impeding the implementation of activities in the program was the time available for the proprietor to participate in program delivery and concerns by both the EHOs and proprietors regarding interruptions due to the normal course of business. Therefore overcoming the difficulties of the workplace interruptions appeared preferable to isolating the proprietor from the workplace.

Cultural acceptability
Despite the fact that most proprietors reacted positively to the program (and indicated that they were satisfied with the delivery and the provision of materials), most indicated that they would have preferred the written and verbal instructions to be given in Vietnamese. This generally related to the inability of staff (other than the proprietor) to assist in the implementation of the tasks as the information was in English. Some proprietors also felt that the provision of the program in Vietnamese would have assisted them in better understanding the program.

Concerns were also raised by the project worker that using a friend or child to interpret the program may have resulted in inaccurate messages being conveyed, as the translations could not be verified. Professional interpreters, particularly when translating information of this nature, are more desirable in order to avoid unreliable information being conveyed (Kangan TAFE 1999). It is also interesting to note that half of those interviewed requested the assistance of an interpreter for the interview, a further indication that some proprietors may not have understood the verbal and written instructions of the program (which were in English).

Apart from the language and literacy issues surrounding the delivery of the program, the other cultural issues impacting on the program involved the nature of Vietnamese cooking methods. Many proprietors said that they did not store hot food as they cook it and serve it immediately to the customers, with one proprietor stating that it would therefore be difficult for customers to become poisoned in his restaurant. If correct temperature storage is applied to these products while waiting to be cooked or prior to cooking this may be the case, however, risks may still be imposed by other handling techniques such as poor personal hygiene or cross contamination. In these cases it also raises the question of whether the taking of the temperatures of...
food is seen as relevant by these proprietors. As mentioned in the discussion of study limitations, it would have been helpful to explore this perception in more detail. The EHOs also expressed concerns regarding this, together with the difficulties that arise due to customer preference for some hazardous foods to be stored outside the correct holding temperature.

The evaluation by the project worker also raised issues surrounding temperature storage, with cases of food poisoning involving Vietnamese foods being attributed to incorrect storage temperatures of food (Commonwealth Department Health and Family Services 1997; Kelton 1998). This perception might also reflect the need for more basic education in this area as well as addressing strategies surrounding customer preference.

Program materials
The most commonly suggested changes to the program materials involved the charts used to document the food safety activities. Even though it was felt that the charts were generally clear and easy to use, it was believed by both the EHOs and proprietors that the charts needed to be consolidated into one book. The EHOs also felt that the durability of these materials needed to be enhanced as well as ensuring access to further copies. The evaluation carried out by the project worker also highlighted the need to review the ease of recording information in charts, such as using “ticks”, rather than numbers or words (Kelton 1998).

Food hygiene training
Most proprietors indicated that they understood the program and various activities; however the evaluation raised doubts regarding this. In particular, most proprietors had difficulties with the concept of ‘corrective action’, with some EHOs also considering this was not fully understood.

Jacob (1992) suggests that one cannot identify a hazard if there is first no possession of the knowledge that a hazard may exist. The ability to identify hazards in food preparation is necessary in order to be able to carry out corrective action and hazard identification and understanding in food preparation are important parts of basic food hygiene education.

Most proprietors in the program had no previous training in food hygiene, suggesting that further basic training in food hygiene may assist with understanding the procedures required in the program. The EHOs also felt more training in hazard identification was necessary. One proprietor, who had previous food hygiene training, indicated that this had helped him understand the program, including terms such as ‘corrective action’. Many studies surrounding training in aspects of food safety programs highlight the need for basic food hygiene training as a prerequisite to food safety program concepts. In particular, Burch (1995) suggests that an essential element of the food safety program approach is that both management and food handlers are fully conversant with all aspects of safe food handling.

From a general theory perspective, to have a clear understanding of why one is carrying out a task rather than being told what to do, is also considered more likely to result in the correct undertaking of the activity (West & Pines 1985). The issue of lack of staff training, understanding or commitment was also mentioned as a difficulty in implementing the procedures by proprietors. Even though the intervention only attempted to introduce the proprietors to the concept, this research, as with other projects such as the FSPSB, BSF, and FSP indicates that this area needs to be addressed (Allman 1996; Small Business Professional Development, 1998; Victorian DHS & ANZFA 1996).

Practicality
The practicality of activities in the program, such as the recording of suppliers’ details, was commonly raised as a difficulty with implementing the program. Specifically, one proprietor felt that the volume and range of
ingredients purchased in his food premises (over 100) made it difficult to record information on a daily basis. Problems were also encountered with suppliers not wanting to wait while deliveries were checked, being able to take temperature of frozen food and the ability to record and check goods on arrival. Some perceived that checking the supplier’s goods was not needed as they thought that the suppliers should guarantee the quality of their goods. Similar problems have been encountered in other food safety program trials involving small business, in particular the FSPSB, which found that premises did not perceive that keeping an up to date list of suppliers was needed (Allman 1996). It appears that education of suppliers regarding the requirements of food businesses to carry out these tasks is also needed to facilitate the new legislative requirement.

**Time, cost and benefits**

Lack of time, perceived costs and the need for clear benefits were common themes arising from the evaluation. These issues have also emerged in other trials regarding food safety programs in small business and appear to be key areas that need addressing in order to facilitate the new approach to food safety (Centre for Public Health 1997; Small Business Professional Development 1998; Victorian DHS and ANZFA 1996).

In particular the FSIP found that ensuring the low cost of undertaking the programs was an essential incentive for businesses (ANZFA 1998). The BSF highlighted the need to link food safety programs to bottom line benefits as a method of addressing these issues (Victorian DHS and ANZFA 1996).

Providing solutions to these problems is not an easy task, with the promotion of benefits being considered by the EHOs as a key method to address them. The difficulty is that the concept of food safety programs for small businesses is relatively new and the assessment of savings or tangible benefits (apart from ensuring continual registration of the food premises under the Food Act 1984) relating directly to businesses are still evolving. For example the FSIP found that some positive benefits for businesses were experienced, including a perceived rise in food hygiene standards, staff becoming more proactive in preventing food spoilage, and with the monitoring of a fridge temperature in one business resulting in the loss of stock being averted. This also highlighted the necessity for the establishment of a routine and cultural change amongst staff and management regarding this new approach (ANZFA 1998).

Rennie (1995) suggests that it is necessary to develop considerable confidence and belief in the current or future benefits if the recommended action is more difficult than the current practice, which is applicable to this program given that documentation is additional to proprietors’ current practices. The FSIP also found difficulties among some premises in keeping up with documentation with staff unwilling to take on new responsibilities (ANZFA, 1998).

The FSP (ACT) project found that businesses are more willing to subscribe to training if they are convinced of its value and their need for training (Small Business Professional Development 1998). This is also supported by Nutbeam (1998) who cites that program acceptance by the target group is essential to the intervention. O’Connor & Parker (1995) suggests that for effective collaboration in health, conditions such as the recognition of necessity for both parties (the ability to gain something from the process for themselves) needs to be incorporated in the intervention.

**Sustainability**

Sustainability of the program was raised as a concern by the EHOs. The Health Action Model proposed by Tones, Tilford, & Robinson (1990) suggests that a number of factors need to be addressed in order for programs to result in sustainable change in the workplace.

These factors include the influencing of norms and significant others, providing an
incentive to change (motivational), belief or concerns regarding adverse effects of current practices, the provision of knowledge, relevant skills and workplace facilities such as the provision of equipment to implement the change (Rennie 1995).

The process applied in this program attempts to address some of these issues such as the provision of knowledge through the training session and facilitating change in the workplace through the provision of equipment such as thermometers and food safety charts. However, the research has indicated that improvements in the provision of suitable knowledge and equipment need to be made. Further strategies need to be developed in the area of benefits, support from other workplace personnel (such as staff training), and addressing the issues of time, practicality and costs in order to ensure effective short and long term changes.

The role of local government

The research has provided the opportunity to examine more closely the role of local government in educating food proprietors as a means of seeking compliance with new food safety legislation, and has raised a range of issues. It has highlighted the need for governments to consider the impact of this legislation on the small business community and perhaps the need to employ strategies recognised by the manufacturing sector in managing cultural diversity in order to achieve more sustainable gains (Migliorino, Miltenyi & Robertson 1994). For example, suggestions for improvements or recommendations for further programs of this nature may include the provision of further training and possible language and literacy support for staff at these premises, resulting in the need for considerably more resources to be made available.

The important question is whose responsibility it is to bear the costs of these programs, and if the responsibility is with local government how capable is it of meeting these demands? One EHO showed particular concern regarding the strain on resources of local government in the provision of this type of program and the ability of councils to meet the costs of any additional program requirements.

Conclusion

The study revealed that there was a perception of a general understanding of the program and tasks by the proprietors. A number of program process supported this including conducting the program at the workplace and the general delivery and provision of equipment and materials to proprietors to undertake the documentation. However, the study did identify a number of areas that impeded the program, particularly the implementation of program tasks. This included the need for a greater understanding of food hygiene concepts by the proprietors, and issues surrounding cultural acceptability, time, costs, benefits and practicality.

Even though the program may have raised the awareness of food hygiene issues, and food proprietors made some attempt at documentation, there is room for improvement in the implementation of the program. This includes investigating the recruitment of bi-lingual workers, enhancing the program materials (in particular, the food safety charts) including food handling staff in the training and the need to develop strategies surrounding the promotion of benefits of this new approach to food safety for small business.

The program processes also appear to be limited in ability to achieve more sustainable outcomes, including changes to food hygiene behaviour without giving some attention to the above areas.

Finally, the study has provided a further indication of the challenges facing both local government and the food industry in achieving compliance with the new food safety legislation, particularly for culturally diverse groups such as Vietnamese food proprietors.
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