

# Food in the Platform Economy

## Self-Assessments (Accessible Version)<sup>1</sup>

### Description

This document presents a proof of concept tool for self-assessment of salient food safety and integrity risks by online food vendors and/or online intermediary platforms active in the food sector.

The tool is composed of four worksheets:

- List of hazards (2x): Enumerates challenges that could contribute to food safety or integrity incidents (the first worksheet is for use by the vendors' self-assessment, the second for the platforms' self-assessment).
- Self-assessments (2x): Generates self-assessment questionnaires from the tables in the list of hazards (one worksheet is for vendors, the other for intermediary platforms).

Macros must be enabled for this file to work.

Please note that this file has an associated report that explains the file in much more detail.

This file is a proof of concept to demonstrate feasibility and functionality (please refer to the associated report for a more detailed explanation). By the same token, the file does not present a ready-to-use final tool.

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<sup>1</sup> The original version of this file is a macro-enabled Excel file. For accessibility, this document presents an easier-to-read version of this tool.

## Version control

v. 08/02/2021: Unified vendor and intermediary self-assessments into a single self-assessment tool. The breaking up of an originally super large risk ranking matrix file into standalone tools facilitated communication, but there were one files too many. Additionally, adjusted text variously for consistency across all tools/files in this project.

v. 12/01/2021: Broke up the master risk ranking matrix into separate standalone documents. Previously, assessments were offered as part of the master document noted below, which was large and somewhat hard to follow. The new set of standalone documents facilitate communication.

v. 01/01/2021: The master risk ranking matrix used to generate this module was quality assured by a member of the FSA's Analytics Unit. No additional quality assurance is deemed necessary at the moment because the proof of concept nature of the tool implies a need for changes before a final product is available.

v. 10/11/2020:

- Visual presentation improved. General functionality revised.

v. 01/10/2020:

- Accidentally named and shared with wrong date in version, see v. 10/11/2020 for pertinent info.

30/09/2020

- First functional version of master risk ranking matrix (covering multiple types of online food actors and presenting the functionality for self-assessments by actors as well as assessments by auditors, inspectors, and/or regulatory organisations).

## Hazards (Vendors)

**Table 1:** General (Applicable to all online food businesses)

<b>Hazard</b>	<b>Self-assessment</b>
Imperfect registration. Some online food vendors may not be aware of or interested in registration.	Are you a registered food business?

Limited experience. New entrants might be tempted to prioritise the learning of online market dynamics over food safety and integrity concerns.	Have you been operating online for many years?
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**Table 2: Vendor-101 (Applicable to all online food vendors).**

<b>Hazard</b>	<b>Self-assessment</b>
Cleanliness. Cleanliness is a foundational requirement. It would be good to confirm if online vendors prioritise it.	Do you ensure that the working environment is clean and suitable for safe food production?
FSMS. It is unknown whether all online vendors have a food safety management system (FSMS) in place.	Do you have a food safety management system (FSMS) in place to cover all of your food business activities?
FSMS (online considerations). Even if a vendor has an FSMS, the vendor might be unaware of the various ways in which online operations may affect the process.	Have you considered how online activities may call for adjusting your FSMS?
Lack of food safety training. The extent to which online food vendors pursue food safety training is unknown, but much variation across types of vendors is plausible.	Have you received food safety training?
Traceability. It is unknown whether many online vendors keep due records of all steps in the intermediation process.	Do you know your traceability obligations and keep records accordingly?
Allergens (understanding). Gaps in communication vis-à-vis the platform economy may mean some vendors are only partially aware of allergens and applicable procedures.	Are you aware of all 14 allergens and prepare your food in accordance to the FSA's allergens guidance?

Allergens (display across sales channels). Some online food vendors may not display allergen information across all online sale channels.	Do you declare allergen information in all sales channels?
Allergens (packaging/service). Some vendors may not display allergen information in packaging or during service due to considering online declarations sufficient	Do you declare allergen information in your packaging and/or at service?
FHRS (coverage). Very small online food vendors may not be covered by the FHRS.	Are you covered by the FSA's Food Hygiene Rating Scheme (FHRS)?
FHRS (herd effects). Display of FHRS by vendors covered by it may be challenged by their need to appear in listings alongside vendors not covered or not displaying FHRS.	Do you display your FHRS across all sales channels?
Food fraud (quality of supply). Online vendors may be at increased risk of being targeted by organised crime.	Do you avoid ingredients buying at discounted prices and/or from non-reputable sources?
Food fraud (lack of customer oversight). The disconnection between preparation and consumption may increase the opportunity for fraudulent behaviour by some online food vendors.	Do you prepare food in front of customers or serve food in premises?

**Table 3:** Logistics (Applicable to vendors involved in food delivery and/or food events' management, incl. those that outsource these tasks to contractors or independent partners/associates).

<b>Hazard</b>	<b>Self-assessment</b>
Delivery (oversight). The relation between the vendors and those fulfilling logistical needs for them may vary significantly, implying varying degrees of oversight over food delivery and/or events' management.	Irrespective of who performs it, do you have oversight and control of all aspects of delivery

	and/or event management?
Delivery (training). Trained delivery personnel are less likely to incur food safety and integrity issues than untrained personnel.	Is your food delivered by someone with food safety training?
Delivery (temperature). Food (including groceries) is susceptible to changes in temperature.	Do you or your delivery partner control the temperature of the food you deliver?
Delivery (contamination). Food (including groceries) can be unintentionally or intentionally contaminated during delivery.	Do you or your delivery partner take measures to avoid food being contaminated during delivery?
Mix-ups (foundational). Accidental mix-ups seem likely in the context of delivery of multiple orders or management of large events.	Do you have procedures to avoid orders from being mixed-up before or during delivery?
Mix-ups (non-foods). Some online vendors may deliver mixed food and non-food products or manage events involving both types of products. The digital aspects of logistics involved may increase all associated risks.	Do you have procedures to avoid food products being mixed with non-food products during transport/delivery?
Mix-ups (allergens). Given separation between production and consumption, products containing allergens may easily be confused during or after transport.	Do you have procedures to avoid ingredients being mixed during transport?

**Table 4:** Personal (Applicable to very small 'personal' type of online food vendors).

Hazard	Self-assessment
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Mixed activities (storage). Some small online food vendors may not store domestic and business foods separately.	Do you store the food that you use for your business activities separately from the food you use for personal consumption?
Mixed activities (preparation). Some online food vendors may not separate the preparation of food for business and domestic consumption.	Do you prepare the food you sell to or exchange with others separately from the food for your own domestic consumption?
Nomadic practices (foundational). Some online food vendors travel or otherwise change kitchens in the process of providing services.	Do you change or alternate where or how you store or prepare food?
Nomadic practices (procedures). A degree of nomadic practices may be impossible to avoid, but procedures to manage the location changes involved may reduce their risk.	Do you have guidelines or procedures to manage the food safety and integrity risks of changing where or how you store or prepare food?

**Table 5: MSMEs (Applicable to all MSME vendors).**

<b>Hazard</b>	<b>Self-assessment</b>
n/a. Medium sized SME vendors are the archetypal type of online food vendors. Most applicable hazards were covered in previous modules.	n/a.

**Table 6: Large (Applicable to large or industrial type of online food vendors).**

<b>Hazard</b>	<b>Self-assessment</b>
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<p>Assessment. Large food businesses often have food safety and integrity procedures in place, but it is uncertain if they have specifically assessed added risks that may arise from online operations.</p>	<p>Have you evaluated the added food safety and integrity challenges that may arise from the online aspects of your business operations?</p>
<p>Regulatory mismatch. Aspects of some online food vendors' online operations may fall under the remit/supervision of different local authorities (LAs), which may further challenge the regulation of online activities.</p>	<p>Are all parts of your business inspected by a primary authority?</p>

## Hazards (Platforms)

**Table 7: General (Applicable to all online food businesses).**

<b>Hazard</b>	<b>Self-assessment</b>
<p>Imperfect registration. Registration expectations for platforms are unclear.</p>	<p>Are you a registered food business?</p>
<p>Limited experience. New entrants might be tempted to prioritise the learning of online market dynamics over food safety and integrity concerns.</p>	<p>Have you been operating online for many years?</p>

**Table 8: Intermediary-101 (Applicable to all intermediary platforms).**

<b>Hazard</b>	<b>Self-assessment</b>
<p>Unregistered vendors. Platforms not requiring vendors to be registered food businesses may contribute to an increase in the number of unregistered food operators.</p>	<p>Do you require and check registration as food business from vendors operating in your platform?</p>

<p>Traceability. It is unknown whether online platforms (or how many) are sufficiently close to their vendors to facilitate traceability should a need for such thing arise (this can be extended to the ability to consider complaints).</p>	<p>Could you trace a food product/service sold or exchanged through your platform to its vendor?</p>
<p>Communications with vendors. Platforms that regularly engage with their vendors on food safety and integrity issues can help communicate applicable guidance if/when needed; the opposite might represent a communications challenge.</p>	<p>Do you maintain regular communication with the vendors in your platform?</p>
<p>Interest in food safety/integrity. The degree to which different platforms encourage vendors to think about food safety/integrity is not well known (especially outside the takeaway sector).</p>	<p>Do you include food safety and integrity considerations in your communications with vendors?</p>
<p>Interest in food safety culture. The degree to which different platforms encourage vendors to think about their food safety culture is unknown.</p>	<p>Do you encourage and support food vendors in thinking about food safety culture?</p>
<p>FSA/LA communications. Good communicate with LAs and the FSA can facilitate regulation; poor communication may represent a challenge.</p>	<p>Do you have established channels/procedures to communicate with local authorities (LAs) and the FSA?</p>
<p>Facilitating allergen declarations. Functionality differentials may affect the extent to which a platform facilitates allergen declarations (and their visibility).</p>	<p>Do you provide the functionality for vendors' allergen declarations to be visible?</p>



FHRS (admission). Platforms that require vendors to have a minimum FHRS score may represent a lower risk than those that do not.	Do you require a minimum FHRS score from your vendors?
FHRS (display). Functionality differentials may affect the extent to which a platform facilitates FHRS display (and their visibility).	Do you provide the functionality for vendors' FHRS score to be visible?
Quality assurance. Platforms with quality assurance processes may help to reduce the likelihood of unintentional incidents and fraud-related incidents.	Do you inspect or otherwise quality-assure your vendors?

**Table 9: Logistics (Applicable to intermediary platforms involved in food delivery/events' management, incl. outsourcing).**

<b>Hazard</b>	<b>Self-assessment</b>
Ownership. The ownership over issues that may arise during food delivery or management of food events/experiences may vary as per the relation between platforms and contractors/associates.	Irrespective of who performs it, do you have oversight and control of all aspects of delivery and/or event management?
Delivery (training). Trained delivery or event management personnel are less likely to incur food safety and integrity issues than untrained personnel.	Do you require or provide food safety training from/to your delivery or event management team?
Delivery (temperature). Food (including groceries) is susceptible to changes in temperature.	Do you ask/provide equipment from/to your delivery or event management team to ensure that food temperature is

	maintained throughout delivery or service?
Delivery (contamination). Food (including groceries) can be unintentionally or intentionally contaminated during delivery.	Do you ask/provide guidelines and equipment from/to your delivery or event management team to avoid food being contaminated during delivery or service?
Mix-ups (foundational). Accidental mix-ups seem likely in the context of the delivery of multiple orders and during the management of large events.	Do you ask/provide guidelines and equipment from/to your delivery team to avoid orders being mixed-up during delivery?
Mix-ups (mixed goods). Some platforms sell food and non-food products. It is unknown if food is being mixed with other products in a way that could lead to cross-contamination.	Do you have procedures to avoid food products being mixed with non-food products during transport/delivery?
Mix-ups (allergens). Mix-ups of allergen and non-allergen items seem particularly feasible in the context of intermediated sales and outsourced delivery of food or management of food events/experiences (too many hands involved type of problem).	Do you have procedures to avoid ingredients being mixed during transport and service?
Vendor matching (foundational). Some platforms may deliver orders combining goods/services by multiple vendors, which may increase risks beyond the single-vendor model.	Do you provide logistical services that lead to you, your staff, personnel, partners, or associates combining

	products/offers by the vendors in your platform into single orders?
Vendor matching (traceability). Without due internal record-keeping by the platform, vendor matching activities may challenge traceability even further.	Do you keep detailed records of the ways in which you combine/match offers by different vendors in your platform?
Meta-aggregation (foundational). Platforms that complement their listings with products or services from other platforms might face added food safety and integrity challenges.	Do your listings include (outsourced) products/services by vendors external to your platform and/or from other platforms?
Meta-aggregation (traceability). Platforms that complement their listings with products or services from other platforms might represent a particularly poignant traceability challenge.	Do you keep detailed records of the products/services you outsource/aggregate from external vendors and/or other platforms?

**Table 10:** *Open/social marketplaces (Applicable to 'marketplace' intermediary platforms).*

<b>Hazard</b>	<b>Self-assessment</b>
Illicit activities. Marketplaces are attractive for vendors who want to sell illegal food items.	Do you monitor listings to ensure no illegal food items are sold or otherwise traded through your marketplace?

<p>Repeat offenders. Marketplaces not requiring proof of ID or registration from vendors may provide an opportunity for repeat offenders to continue business indefinitely.</p>	<p>Do you require proof of ID or business registration from users as a pre-requisite to enabling the marketplace functionality?</p>
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# Self-assessment (Vendors)<sup>2</sup>

## Self-assessment (for vendors)

**Step 1:** Do you, your staff, or contracted undertake food delivery (irrespective of food being raw or cooked) and/or event/experience management (incl. but not limited to supper clubs and catering services)?

<input type="button" value="NO"/>	<input type="button" value="YES"/>
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**Step 2:** Are you a very small personal food operator (e.g. home kitchens, amateur part-time chef, etc.) or, alternatively, a large/industrial food business (e.g. restaurant chain, large catering service chain, online supermarket) operator?

<input type="button" value="PERSONAL"/>	<input type="button" value="INDUSTRIAL"/>
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Answer the questions. The coloured boxes will provide you a rough estimate of the likelihood of facing a related food safety/integrity issue (which may harm others and lead to losses and penalties for you and/or your business). Do note that this form is entirely for you to self-assess your activities and self-reflect on them. If you answer incorrectly, you'd be lying to yourself.

	<b>Likelihood</b> of a related incident
	<b>ANSWER HERE</b>
	<b>DO NOT MODIFY</b>

**Figure 1:** Screenshot of the self-assessment (for use by vendors) questionnaire.

<sup>2</sup> In the original version of this file the self-assessment questionnaire contains actionable buttons by which to select the type of actors/business to analyse. Macros then populate the questionnaire with applicable questions. In this file, a screenshot is offered in lieu of the ability to offer working macros.

# Self-assessment (Platforms)<sup>3</sup>

Self-assessment (for intermediary platforms)

**Step 1:** Do you, your staff, personnel, or external associates undertake/facilitate food delivery (irrespective of food being raw or cooked) and/or event/experience management (incl. but not limited to supper clubs and catering services)?

**Step 2:** Is your platform a social marketplace (i.e. a space where vendors/customers can socialise in ways that go beyond order-placing and -fulfillment)?

*Answer the questions. The coloured boxes will provide you a rough estimate of the likelihood of facing a related food safety/integrity issue (which may harm others and lead to losses and penalties for you and/or your business). Do note that this form is entirely for you to self-assess your activities and self-reflect on them. If you answer incorrectly, you'd be lying to yourself.*

	ANSWER HERE	Likelihood of a related incident  DO NOT MODIFY

**Figure 2:** Screenshot of the assessment (for use by qualified auditors and/or inspectors) questionnaire.

## Administrative sections<sup>4</sup>

**Table 11:** Guidance for respondents (auto-populated by questionnaires).

Likelihood (self-assessment)
NO (Never)
MINIMALLY (Barely)
SOMETIMES (More or less)
REGULARLY (Yes, but 'things' happen)

<sup>3</sup> In the original version of this file the assessment questionnaire contains actionable buttons by which to select the type of actors/business to analyse. Macros then populate the questionnaire with applicable questions. In this file, a screenshot is offered in lieu of the ability to offer working macros.

<sup>4</sup> The original file contains an additional section/sheet for functionality, with the contents declared below.

ALMOST ALWAYS (Mostly, with very isolated mishaps)

YES (Absolutely, no exceptions)