KitchenLogs and Harrow Council Feasibility Study 2018

1. Background and Context

1.1. Regulating Our Future (ROF) is a major transformation programme to modernise and re-shape the regulatory regime for food. ROF will change the way food businesses are regulated and inspected across England, Wales and Northern Ireland. The Food Standards Agency (FSA) aims to have a new system in place by 2020.

1.2. The FSA is taking a whole system approach, understanding what information is available from a wider range of sources and how this can could be used in the future to gain assurance that food is safe, what it says it is and public health is protected.

1.3. Through ROF the FSA is looking to make more use of 2nd and 3rd party data and businesses' own assurance systems to support regulation. New and emerging enterprises, technology and innovations have the potential to provide a range of data that could support the ROF target operating model.

1.4. The FSA is committed to working in an open policy making way engaging with a wide range of stakeholders across the food industry. By working with KitchenLogs during this feasibility study, the FSA aimed to take on board fresh ideas, best practice and lessons learned, enabling the development of the best possible regulatory model for food.

2. KitchenLogs (Food Safety Diary App)

2.1. KitchenLogs are a London based start-up who have developed a commercially available digital food safety management system.

2.2. The system contains pre-installed checklists based on the FSA's food safety management system, safer food, better business (SFBB). The system can be modified to suit business requirements and can be downloaded for use on both Android and iOS devices.

3. The Application

3.1. The FSA received and subsequently approved an application for a feasibility study from KitchenLogs in partnership with Harrow Council. The feasibility study started in July 2018.

4. Objectives and Methodology

4.1. The objectives for the feasibility study were as follows:

- Implement KitchenLogs digital Food Safety Management System (FSMS) in 3 food business operators (FBOs) who are FHRS rated either 1 or 2 and assess whether using a KitchenLogs digital FSMS can increase the FHRS score (and improve hygiene/standards and safety).
- Sharing data with local authorities.

4.2. Three food businesses (all restaurants) were selected by the Local Authority (Harrow Council) for inclusion in this study. The selections were made during week beginning 16 July 2018.

4.3. Business 'A' serves Japanese cuisine. Prior to the study it had a history of poor hygiene and food standards and was most recently inspected in July 2018 and deemed to have had issues with food handling processes and a lack of implementation of food safety procedures. The business was subsequently awarded a Food Hygiene Rating Scheme (FHRS) score of 1.

4.4. Business 'B' serves Indian cuisine. Prior to the study, it was most recently inspected in late May 2018 and had issues with completing Hazard Analysis and Critical Control Points (HACCP) records and recording allergen information. The business was subsequently awarded a FHRS score of 1.

4.5. Business 'C' serves Indian and East African cuisine and has an onsite licenced bar. Prior to the study, it was most recently inspected in July 2018 and there were issues with the consistency of completing HACCP records, as well as food handling concerns. The business was subsequently awarded a FHRS score of 2.

4.6. The businesses were all keen on taking part in the study as paying customers. They were onboarded during week beginning 6 August 2018. The KitchenLogs team attended the premises of the businesses taking part in the study and gave them access to their food safety management system. The team also provided the necessary training needed to use the software and assisted them through the transition.

4.7. The business received an email prompt from the system when data recording was required and were given a four-hour slot to log the information. Businesses received a report at the end of each day detailing the data that had been logged for that time period. KitchenLogs were able to access the data entered to monitor the business' compliance and offer assistance.

4.8. The information and data being entered by the businesses was actively monitored until 19 October.

4.9. A new round of inspections was carried out by the Local Authority in November 2018.

5. Findings

5.1. There was an improvement in the FHRS score for two out of the three businesses. Business ‘B’ and Business ‘C’ increased their ratings from 1 to 4 and 2 to 4 respectively. The Environmental Health Officers involved however noted some minor failings with the structure and handling practices at both premises.
5.2. This was the highest rating Business ‘B’ and Business ‘C’ had received in the last four years.

5.3. Business ‘A’ remained on FHRS score of 1. The Environmental Health Officer cited issues around the handling of raw food and lack of knowledge by staff.

5.4. An Environmental Health Officer mentioned that Business ‘A’ ‘was guilty of practices which would have dragged them down however good the records were.’

5.5. It was observed that there was a lack of management presence on-premise at Business ‘A’ and staff were reluctant to implement the food safety policies put in place to enable the food safety management system to be used effectively.

5.6. An Environmental Health Officer said regarding food safety management systems ‘They are only as good as the management and maintenance of the safety procedures underpinning them and they don’t replace sensible management.’

5.7. Regarding data, the Environmental Health Officers involved in the study preferred to review this at the premise - as opposed to contacting the proprietor to request access, receive the data, and then make the unannounced visit.

5.8. The Environmental Health Officers mentioned that a constant stream of data to the Local Authority would be overwhelming. However, it would be beneficial to get access when needed, to live data, without sending a request to the business.

5.9. The Environmental Health Officers involved noted that the digital records reviewed at premise were clear and that a digital system used properly would help to improve a business’ management score.

5.10. The Environmental Health Officers involved felt that tamper-proof data added a layer of trust and authenticity.

5.11. The Environmental Health Officers involved also mentioned that a food business which was poorly rated could build trust over time and benefit from being inspected less often if it properly used daily opening and closing checks which would demonstrate a commitment to good hygiene and housekeeping.

5.12. At a post feasibility study interview with KitchenLogs, the team felt that there is a real need get buy in from the right people (i.e. management) at the start of the digital implementation, else there may be issues in staff transitioning to use the new system. This observation was not evaluated as part of the feasibility study; however, it is noted that management for Business ‘A’ worked at an alternative site, were not actively involved in its running and managed this restaurant remotely.

6. Conclusion and Recommendations

6.1. The feasibility study, although not designed to be a comprehensive scientific study, has demonstrated using a small sample of businesses, the use of a digital food safety management system as an alternative to paper-based system for poorly rated food businesses. This study has demonstrated that digital systems could prove to be beneficial tools in improving compliance and potentially increase the FHRS score, but only when the business is willing to follow the procedures in place.

6.2. This study was designed as a small-scale preliminary study and there is value in commencing to a pathfinder with a food safety management system provider. The pathfinder would need to be designed using more analytical and scientific methods, with more refined objectives, use a larger sample size, multi-region, use a cross-section of food businesses, run for a longer duration and use not only low rated FHRS businesses but also high rated ones.

6.3. The increase in companies offering digital food safety management system could be seen as an opportunity at the FSA to lead on a standard that is used as a baseline in this industry.

7. Acknowledgements

7.1. The Food Standards Agency is grateful for the time, resources and input into this study by:

- KitchenLogs
- Harrow Council
- The three food business operators

8. Glossary

i) Feasibility Study

A small scale preliminary study, conducted in order to identify feasibility, time, cost, adverse events, predict an appropriate sample size, and help to develop the study design prior to larger scale ‘Pathfinder’ activity

ii) Pathfinder

A project that increases understanding of an element of the new regulatory model. In doing so, pathfinder projects will assist in finding out what works best for implementation. Knowledge gained is shared openly for the benefit of the wider organisation/programme