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 (TOM).

1.4. The ROF programme is committed to working in an open policy making way engaging with a wide range of stakeholders across the food industry. This includes the use of short duration *feasibility studies* to help shape and develop the TOM. By working with Scoresafe Food Hygiene Services Ltd (hereafter referred to as Scoresafe) and Taunton Deane Borough Council and West Somerset Council during this feasibility study, the FSA aimed to take on board fresh ideas in the registration arena and understand best practices and lessons learned, enabling the development of the best possible regulatory model for food.

2. The Scoresafe System

2.1.Scoresafe is a company based in Taunton that has developed a commercially available food safety management system.

2.2. The system is available via a web based portal and is accessible (as a download via the portal) on Android devices.

2.3. The system generates checks from data captured through the set-up process, this is based on prescribed critical limits at critical control points and checklists similar to those found in Safer Food Better Business (SFBB).

3. The Application

3.1. In December 2017, the FSA received and subsequently approved an application for a feasibility study from Scoresafe, to be delivered in partnership with Taunton Deane Borough Council and West Somerset Council. The feasibility study subsequently started on 19 February 2018.
4. Objectives and Methodology

4.1. The objectives for the feasibility study were to determine whether digital technology could:

- Gather electronic registration information from existing food businesses via a web portal. Where possible extend this to new food businesses.
- Evaluate the ease of sharing the data with Taunton Deane Borough Council and West Somerset Council.
- Understand whether food businesses are willing to engage and share their own information via a web portal with the regulator.
- Understand whether the Scoresafe enhanced registration data can be used by Taunton Deane Borough Council and West Somerset Council to validate or enhance currently held food business information.
- Understand whether food businesses prefer using an online portal or traditional paper based methods for food business registration.
- Understand how many of these food businesses thereafter proceed to use digital technology as a food safety management system.
- Understand whether Taunton Deane Borough Council and West Somerset Council could potentially use information from the online portal to improve efficiency in the delivery of official controls.

4.2. The feasibility study involved Taunton Deane Borough Council and West Somerset Council sending an invite to twenty food businesses in the local borough. The businesses were not intended to be statistically representative of any particular group.

4.3. The businesses willing to participate in the study were sent a confirmation email from Taunton Deane and West Somerset Council.

4.4. Scoresafe thereafter sent an email invitation requesting the food business operator registers the details of their business on a Scoresafe portal.

4.5. None of the businesses invited were existing users of the Scoresafe system. Also, the Scoresafe system was provided free of charge to each business for the duration of the feasibility study. There was no expectation upon the business to continue using the system post the feasibility study.

4.6. The food business operators entered the details of their business on a registration page and a summary page was subsequently generated which was sent on to Taunton Deane Borough Council and West Somerset Council.
4.7. The Environmental Health Manager from Taunton Deane Borough Council and West Somerset Council was then tasked with assessing the data and where applicable, cross-referencing against existing records.

4.8. The Environmental Health Manager carried out qualitative feedback with the food business owner on conclusion of the data review.

5. Findings

5.1. Research during the feasibility study and the collation of qualitative and quantitative data was undertaken by the Environmental Health Manager at Taunton Deane Borough Council and West Somerset Council. Below is a summary of their findings.

5.2. Twenty-nine food business operators were contacted by Taunton Deane Borough Council and West Somerset Council between 1 March and 29 April.

5.3. Seventeen of the food business operators contacted expressed an interest in taking part in the study. Ten food business operators subsequently registered.

5.4. None of the ten food businesses that registered were new businesses and all had received an inspection in the last twenty-four months.

5.5. Once the food business operators had registered their premises, the registration information was input onto a summary sheet and sent to Taunton Deane Borough Council and West Somerset Council. Research suggested that the input of data onto the summary sheet was time-consuming as it was not automated. However, the data sharing between Scoresafe and the Local Authority was smooth according to the Environmental Health Manager.

5.6. Scoresafe mentioned that they could automate the above process or provide access to the portal for the Environmental Health Manager, thus simplifying the transfer of data and removing the need for a manual summary sheet. This was not in scope for the feasibility study however.

5.7. The research found that, in terms of the breadth of data collected from registration, the Scoresafe portal collected far more, compared to the existing Taunton Deane Borough Council and West Somerset Council food business registration form. It is however acknowledged that data collected via written forms is designed addressing different user needs and return techniques. The additional fields that appeared on the Scoresafe portal and not on the existing Taunton Deane and West Somerset Council food business registration form are in Annex A.

5.8. The research identified a few questions which were on the existing Taunton Deane Borough Council and West Somerset Council food business registration form but not on the Scoresafe portal, such as the names of the water supply providers and the details of the head office.
5.9. The research identified areas which were not captured by either the food business registration form or Scoresafe, such as the size of the business and the target customers (i.e. end consumer, other businesses etc.).

5.10. The Environmental Health Manager said that receiving the additional data upfront for the duration of the study led to better and more informed decision making regarding the risk of the business.

5.11. The Environmental Health Manager suggested that the collection of additional fields upfront could potentially be used to evaluate food business risk. However, this was out of scope for the study.

5.12. Of the nine respondents to the post study questionnaire, eight preferred using an electronic registration form for the purposes of food business registration. One preferred a paper format.

5.13. All nine respondents were happy with the Local Authority being given permission to see the data.

5.14. The Environmental Health Manager suggested that it would be useful to use the data received (via the digital platform) to send targeted guidance to food business operators.

5.15. The Environmental Health Manager felt that time could be saved if food business registration data were received directly by the Local Authority from a reliable digital platform. They also said that this data could be used by the Local Authority to prioritise responses to new registrations and changes.

5.16. The Environmental Health Manager said that receiving food business registrations digitally was more convenient as it cut down on paper copies, was a smoother process and contributed to a paperless office environment.

5.17. The Environmental Health Manager felt that the food business operators were excited about the prospect of using a digital platform to register and of the ten who registered via the portal, three businesses requested an extension of Scoresafe services for the purposes of digital food safety management.

6. Considerations

6.1. Consideration will need to be given in any future model to the emergence of digital food management related services.

6.2. Consideration will need to be given to exploiting emerging technologies to send food registration information directly to Local Authorities, to improve efficiency in the delivery of official controls.

6.3. Consideration will need to be given to stipulating a minimum data set that needs to be captured at the outset to ensure a successful food business registration.
6.4. Consideration will need to be given to understanding the most efficient means for Local Authorities to receive and view new food business registration data (i.e. via a portal, using existing databases etc.).

6.5. Consideration will need to be given to ensure this data is sent in the most time efficient way so to keep the Local Authorities well informed as and when there are changes.

6.6. Consideration may also need be given to how data collected from the outset can be used to inform the risk category of a food business.

6.7. Consideration may also need be given to whether data collected from the outset can be used by the regulator to further inform their approach to improve the efficiency in the delivery of official controls.

7. Conclusion and Recommendations

7.1. The feasibility study has demonstrated the value of using a digital system as an alternative to paper based systems, for the purposes of food business registration.

7.2. A future pathfinder or feasibility study could help to fully understand and evaluate these issues in more depth. Any future study should be based on a larger sample of food businesses, including new food businesses and be cross-Local Authority.

8. Acknowledgements

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

- Taunton Deane Borough Council and West Somerset Council,
- Scoresafe Ltd.
- The nine food businesses and staff involved in the study.
9. 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
# Annex A

## Comparison of Registration Information

<table>
<thead>
<tr>
<th>Information</th>
<th>Existing registration form</th>
<th>Scoresafe</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of FBO</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Address of the premises</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Trading name</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Telephone</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Email</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Head office</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Local Authority (originating authority)</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Type of food activity</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Private water supply</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Opening hours</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Number of staff</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Number of food handlers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suppliers names and addresses</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Pest control</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Type of food handled (raw, ready to eat, etc)</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Type of processing/handling/packaging</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type of food storage (frozen, chilled, ambient etc)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type of service (Hot holding, chilled)</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Equipment (cooking)</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Equipment (cleaning)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Equipment (temperature controlled)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Structure: Surfaces (walls, floor, ceilings)</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Structure: washing facilities (wash basins, food washing, utensil wash)</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Structure: staff cloakrooms</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Structure: extraction</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Waste disposal</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>100%</td>
<td>38%</td>
<td>88%</td>
</tr>
</tbody>
</table>