WORKSHEET 3.6

# Observing Without Changing the Work

*Subchapter 3.6 · case in the book: Penang*

When your auditor walks into the kitchen, what changes in the first five minutes, and how would you know what the kitchen looked like before?

This worksheet turns the tools of the subchapter into a form you can fill in. The texts come from the book; the empty columns are for your own property. Adapt it before use: an unadapted checklist is exactly what the book warns against.

## Practical application: what to do in your property

| Step (from the book) | Done? | What we found / owner |
|---|---|---|
| The observation method: Observation audits of live stations would last at least ninety minutes, include the busiest hour, start on the guest side, and continue openly at the stations. | | |
| The cameras: The security cameras would not be used for food safety audits of individual behaviour. | | |
| The station kit: Each station received a standard kit: two pairs of colour-coded tongs, a spare gas canister, a probe with a spare battery and test strips for the sanitiser. | | |
| Guest observations: Guest reports about food handling would be logged as observations, passed to the food safety team, and verified within one Hawker Night. | | |

These steps are the book's method, not requirements of ISO 22000. Evidence can take whatever form suits the property; a separate document is needed only where an applicable requirement, or the property's own system, makes it necessary.

## Verification Pact: what is believed, tested against the standard

| What is commonly believed | What actually holds | Our position |
|---|---|---|
| "Internal audits must be announced." | No. Neither the standard nor the guidance requires notice of the exact day; the programme defines methods. | |
| "Security footage is good audit evidence of individual behaviour." | Not as stated. Information used in an audit should respect confidentiality and the purpose for which it was collected. | |
| "Observation without interview proves nothing." | No. Observation is a recognised method; information is verified, by any means, before it becomes evidence. | |
| "A covert audit is more objective." | No. Objectivity depends on method and evidence; integrity excludes deception. | |
| "The auditor should correct what she sees." | Not as stated. She records and reports; she intervenes only where a guest is at immediate risk. | |

## Common mistakes: a self-check

| Mistake (from the book) | Present here? | Action / owner |
|---|---|---|
| Short audits at the start of service | | |
| Arriving conspicuously | | |
| Using security footage for audits | | |
| Interviewing before observing | | |
| Ignoring traces | | |
| Closing guest reports as complaints | | |

## Operative synthesis

- **Do observation audits include the busiest hour and last long enough? (Programme manager): Audit plans and times**
- **Is the observation method written and known to staff? (Food safety team leader): Programme; briefing record**
- **Do auditors read traces, not only behaviour? (Lead auditor): Audit notes**
- **Is any recording used only for its stated purpose? (General manager): Policy on cameras and devices**
- **Are guest reports verified as observations? (Food safety team leader): Observation log**
- **When did an auditor last see our busiest hour?: A date, a time, and what was found**
- **What did the auditor find in the bins?: A specific trace and what it showed**
- **Are we using any recording of staff for purposes they were not told about?: No, with the policy to show it**

## Action plan for our property

| Action | Owner | Due | How we will know it worked |
|---|---|---|---|
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Source: Francesco Dore, The Helm and the Lens, Volume 6b «The Lens», subchapter 3.6. Edizioni Effedore, 2026. Clause references are paraphrased; this sheet does not reproduce the text of ISO 22000, ISO 19011, ISO 22003-1 or ISO/IEC 17021-1. It is not legal advice: food law is that of the place where the property operates.