

**BASECODE**

# **Reframing Compliance as Culture**

**APPENDIX**

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Compliance Tracking in Practice:

What's Working – and Where We Might Nudge

Exploring kitchen compliance behaviors to improve tracking without disrupting workflow.



What We'll Cover

- Approach & Why  
Our methodology and rationale for examining kitchen compliance tracking.
- What's Already Working  
Successful compliance tracking practices currently in place.
- Where Tracking Doesn't Stick
  - Individual vs. system-based tracking
  - Support without participation
  - Lack of natural tracking moments
  - Underutilized tools
- Opportunity Spaces & Your Input  
Potential solutions and areas where we need your expertise.

Approach & Why

Approach to understand kitchen compliance tracking:



Where Tracking Doesn't Stick (Yet)

Key opportunity spaces identified:

- Individual vs. System  
Tracking happens through personal initiative, not team practice
- Support vs. Participation  
Flex staff follow direction but don't engage with tracking
- No Dedicated Moment  
Tracking happens between tasks, not as a defined step
- Tools Present But Not Embedded  
Equipment available but not integrated into workflow
- Silent Compliance = Missed Learning  
Following without discussing prevents improvement

What's Already Working

- Safety Practice Embedded in Craft  
What it says:  
Probe used to check tof temp before plating. Food cooled properly in blast chiller.  
Why this matters: These actions show **embedded food safety behaviors** in the chef's **intuitive workflow** without prompting.  
How observed: Chef consistently used thermometers and proper cooling techniques as routine practice, not as performance.
- Adaptive Flex Staff  
What it says:  
"I just freelance here!"  
[Observed] Flex chef adjusted immediately after feedback.  
Why this matters: Flex staff are responsive and engaged, representing an **untapped opportunity** for compliance tracking.  
How observed: Immediate positive response to corrections.
- Light-Touch Kitchen Coordination  
What it says:  
Hub gave brief but repeated instructions. Stations adjusted smoothly during pressure.  
Why this matters: Demonstrates a **light-based, low friction system** where light-touch leadership maintains service flow.  
How observed: Chef gave short, repeated guidance throughout service while completing his own tasks.
- Pride in Doing Things Right  
What it says:  
"I'm in control of the furnace!"  
[Observed] Chef double-checked placement in the blast chiller – even later in the shift.  
Why this matters: Food quality and safety are treated as **craft and responsibility**, creating a strong **foundation for tracking systems**.  
How observed: Chef used senses, temperature checks, and the app without prompting, demonstrating **ownership of results** rather than mere task completion.



Tracking Lives in Individuals, Not Systems

- Solo Responsibility  
"Everybody has the app... everybody should do it. I often do it twice!" – Hub  
Chef logged temperature without reminders.
  - Self-Reminders Required  
"I also forget... but I told myself I just have to open the app"  
No one else opened or interacted with the app.
  - Tech Knowledge  
Hub explains factors and after using thermometer without prompting.
  - Tech Integration  
Chef connects thermometer to app via bluetooth before measuring.
- Why this insight matters:
- Shows that tracking is happening – but it's a personal choice, not a shared practice
  - Reinforces that the restaurant's capability or willingness – it's about distribution and visibility.

**What this suggests:**  
Tracking works – but only when someone personally takes it on. It's not reinforced as a team rhythm or shared expectation.



Support ≠ Participation

Flex staff provide necessary support but don't fully engage with compliance tracking systems:

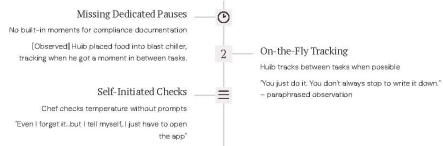
- Task Focus  
Flex staff concentrate on assigned duties
- Direction Response  
Follow guidance for preparation techniques
- Compliance Gap  
Don't engage with tracking responsibilities
- Role Limitation  
"I just freelance here!"

**What this suggests:** Flex staff operate as supporters, not system actors. It's not about willingness – it's about how roles are framed and handed off during service.



No Natural Moment for Tracking

There was no point in the shift where tracking behavior was built in. Chef was tracking in between tasks.

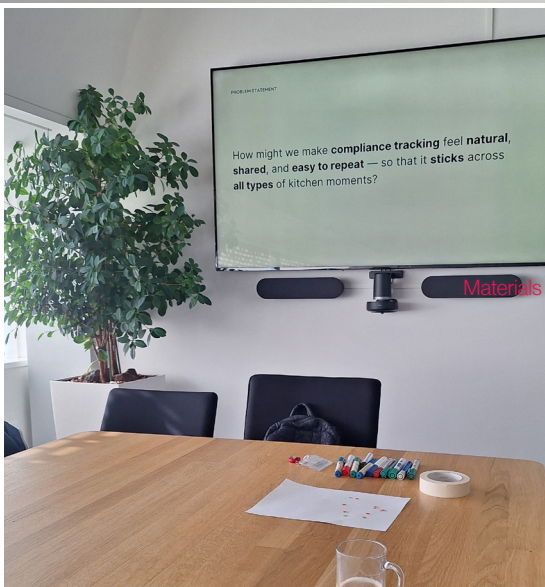
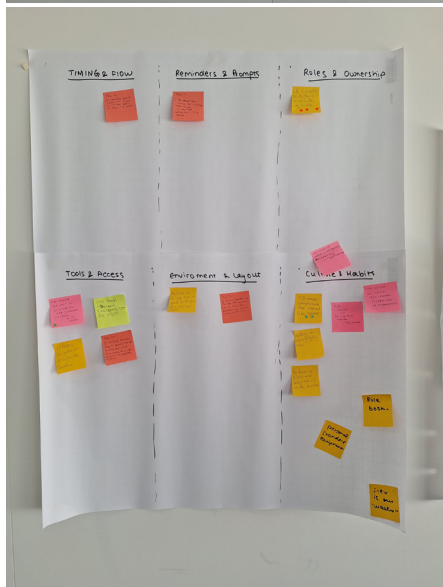
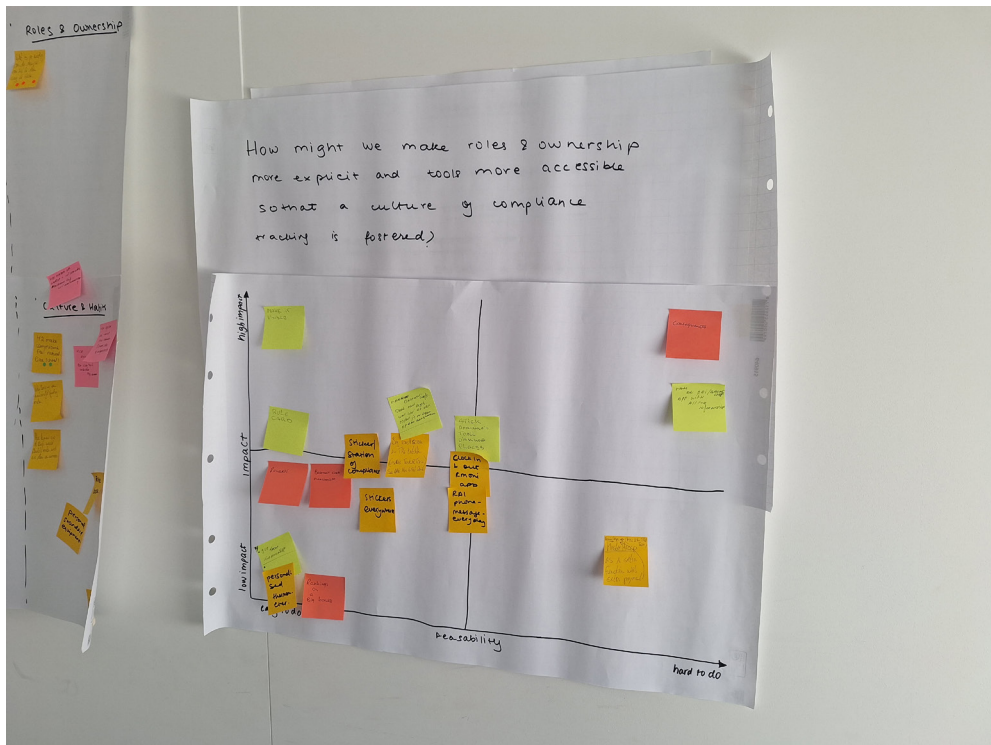


**What this suggests:** The kitchen has rhythm – but tracking isn't built into that rhythm. Without a pause, the system doesn't prompt documentation.

Appendix B: Ideal HACCP Journey

	Arrival & Preparation	Goods Reception	Storage	Food Preparation	Cooking	Cooling & Storage
Timing	Daily/Start of every shift	Per delivery batch	Immediately post-delivery	During all Prep Tasks	Per Food Batch	Post-cooking, within 2 hours
Location	Changing Room/Kitchen Entry Point	Receiving Dock / Cold Staging Area	Cool Room/Dry Store/ Freezer	Main Prep Area	Cooking Line / Hot Kitchen	Cooling /Blast /Blast Chiller
Responsible Actor(s)	All Staff/ Entry Supervisor	Receiving Chef / Logistics Support	Storage staff/line cook	Line cook / Flex staff	Chef de Partie / Line cook	Line cook / Steward
Sequential Activities	<div>Change into clean uniform and shoes</div> <div>Remove jewelry and personal items</div> <div>Wear hairnet/hat/goggles</div> <div>Wash hands thoroughly before kitchen entry</div>	<div>Assign goods to loading dock</div> <div>Measure temperature of chilled/frozen goods</div> <div>- Inspect packaging, labels, and expiry</div> <div>Report anything non-compliant items</div> <div>Verify supplier information (SAPs)</div>	<div>Store goods in designated zones</div> <div>Apply FIFO method</div> <div>Label items with date/time</div> <div>Log storage temperature</div>	<div>Separate raw and cooked prep areas</div> <div>Use color coded tools</div> <div>Separate surface prep and one</div> <div>Check hand between tasks</div> <div>Hand sanitise between tasks</div> <div>Thaw allergen control zones</div> <div>Thaw allergen control zones</div>	<div>Cook food from 80°C to 70°C within 2 hours</div> <div>Use shallow containers/blast chiller</div> <div>Load blast/chill line</div> <div>Log cooling temperatures and blast cooling time</div>	<div>Cool food from 70°C to 5°C within 2 hours</div> <div>Use shallow containers/blast chiller</div> <div>Load blast/chill line</div> <div>Log cooling temperatures and blast cooling time</div>
CCP (Critical Check Points)	Hygiene check before kitchen entry	Delivery temperature and visual compliance	Correct storage zone and FIFO labelling	Cross contamination prevention	Core temperature control	Cooling time and temperature compliance
Tools Required	Uniform, sink, soap, hygiene checklist	Thermometer, delivery log, rejection form, allergen info system	Labels, temperature log, storage containers	Cover-coded tools, sanitizers, soap, gloves, allergen signage	Thermometer, cooking logbook, sanitizer wipes	Shallow containers, blast chiller, cooling log
Documentation	Hygiene checklist	Delivery temperature log, rejection record, allergen log	Storage log, temperature records	Sanitisation checklist, allergen zone log	Cooling temperature log	Cooling record with time/temp
Management Point (BP)	Wash hands and check uniform cleanliness Waste dispose tissues, packaging in bins	Sanitize thermometer after use Waste bin rejected/expired	Clean shelves and storage surfaces - Waste: remove outer packaging waste	Sanitize utensils/surfaces between use Waste: bin food scraps securely	Clean thermometer and cooling surfaces Waste: remove burnt/excess food	Sanitize cooling containers and chiller Waste: dispose cooling wipe/labels
Health Consideration	Do not enter if symptomatic (fever etc)			Avoid prep if experiencing illness symptoms		

## Appendix C: Co-Framing Workshop



WORKSHOP OBJECTIVE

- Welcome & Intro
- Icebreaker
- Activity 1 - How to's
- Break
- Energiser
- Activity 2 - Ideation
- Matrix Mapping
- Wrap up

### Embedding Sustainable Compliance Tracking in Professional Kitchens

Creative Workshop May 8th

WORKSHOP OBJECTIVE

We're here today to explore how we can make compliance tracking **easier, smarter, and more natural** in our daily kitchen routines.

But before we dive in...

👉 Let's start with a quick quiz.

Answer: b) Asks/waits for the shift lead to instruct her on next steps

QUOTES FROM SHADOWING

"I don't think I'm at that level of responsibility yet."

MAIN INSIGHT

When expectations aren't clearly defined, flex staff default to **non-participation** in logging.

WHY THIS MATTERS

Behavioural adoption isn't about willingness — it's about **role clarity**. Without it, capable people step back from tasks that "don't feel like theirs."

QUESTION 3 OUT OF 4

A freelance chef arrives first for his shift. The kitchen looks clean. There are no immediate issues, and prep needs to begin. What does he do next?

- Logs the check immediately in the app
- Focuses on food prep, then logs it later from memory
- Waits for the supervisor to assign the task
- Takes a dance break 🕺

Answer: b) Focuses on food prep, then logs it later from memory

QUOTES FROM SHADOWING

MAIN INSIGHT

When there's no problem to solve, **logging**

QUESTION 1 OUT OF 4

A chef in the staff kitchen is preparing for the lunch rush. He checks the food temperature with a thermometer. What does he do next?

- Opens the app and logs it right away
- Jots it down on a sticky note to log later
- Asks a colleague to fetch the iPad from the main kitchen
- Doesn't log

Answer: c) Asks a colleague to fetch the iPad from the main kitchen.

QUOTES FROM SHADOWING

"I remember it. I will do it, but, you know, I don't have the iPad with me, so I'll do it when I have the iPad."

[At the end of service] "Okay let's do this," "What was the temperature again?"

MAIN INSIGHT

Logging is delayed not because chefs don't care but because **service rhythm overrides system logic**.

WHY THIS MATTERS

Compliance tools that are not embedded/present at the point of action are easy to forget or postpone, especially in high-pressure service contexts.

QUESTION 2 OUT OF 4

A contract flex worker, finishes prepping meals in the staff restaurant. What does she do next?

- Measures the temperature
- Asks/waits for the shift lead to instruct her on next steps
- Books a flight to Portugal
- Logs the checks proactively in the app

Answer: c) Responsibility silently shifts to the lead alone

QUESTION 4 OUT OF 4

Every kitchen shift now has a designated "compliance lead" who's responsible for logging all checks. What tends to happen next?

- The lead tracks and delegates evenly
- Logging becomes more consistent across the team
- Responsibility silently shifts to the lead alone
- Everyone contributes equally since roles are now defined

Answer: c) Responsibility silently shifts to the lead alone

QUOTE FROM INTERVIEW

"We noticed that when you assign one person to do it, others tend to lean back... and just expect that person to do it."

MAIN INSIGHT

Centralised roles can unintentionally cause **ownership diffusion** — where others disengage from shared responsibility.

WHY THIS MATTERS

The system seems covered, but it's fragile. When that one person is absent, **tracking gets lost**.

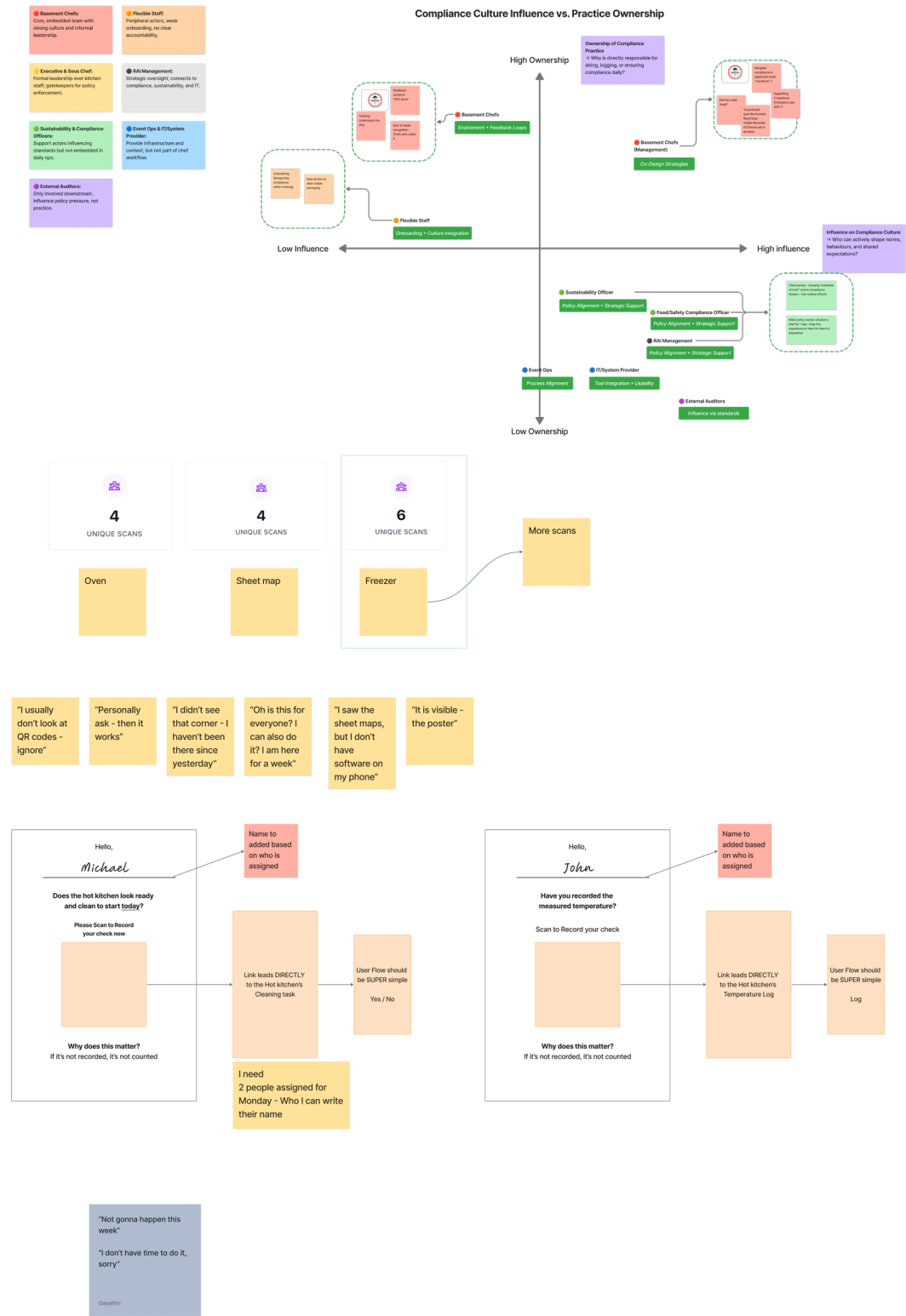
PROBLEM DEFINITION

**What it Leads Into**

These answers aren't problems — they're patterns. And that's what we're here to fix — not by working

Presentation: Insights presented as a quiz to be more interactive

Appendix D: Testing Insights





Appendix E: Exploration of Behaviour Frameworks

POUR stands for:

- **Perceivable** – Is the system visible and discoverable at the moment it is needed?
- **Operable** – Can the user physically or digitally access and operate the system?
- **Understandable** – Is it clear what the system is asking, and does the user understand what to do?
- **Robust** – Can the system support varied users, tasks, and parallel actions reliably?

Principle	Field Observation	Barrier	Implication
Perceivable	iPads often stored in lockers or behind prep lines, not in the immediate workflow	System is not visually present at the moment of action	Staff don't receive a visual cue to log compliance
Operable	Flex staff often lack login credentials or shared devices are in use	Some users physically cannot engage with the system	Creates exclusion for temporary workers or during busy service
Understandable	UI shows red flags for non-compliant entries; forms can be confusing under pressure	Staff perceive errors as personal mistakes	Logging feels risky or high-stakes, which leads to avoidance
Robust	The app locks when one person is already using a form; system only supports serial input	Multiple users can't log in parallel	Creates bottlenecks, delays, and ownership diffusion

What is ABC?

- **Antecedents:** What happens before the behaviour; triggers or conditions that prompt it
- **Behaviour:** The observable action or inaction
- **Consequences:** What happens immediately after; reinforces or disincentivises repetition
- This structure helps us understand why logging either happens or drops off, especially in high-pressure, real-time work like kitchens.

Phase / Situation	Antecedent	Behaviour	Consequence
Start of Shift	No reminder or role assignment; iPad not visible	Logging not initiated	Compliance forgotten, assumed to be someone else's task
After Visual Checks	Kitchen looks clean, no issues spotted	Staff skips immediate logging	No issue means no record, no accountability created
During Prep / High Pressure	iPad distant or in use; service takes priority	Staff defers logging "until later"	Staff forgets what to log; may enter incorrect or missing data
Task Already Done by Someone	App shows entry already made, or form locked by another	Staff assumes logging is covered	Ownership diffused; system logs depend on one person
Entry Triggers Error Message	Red flag warning (non-compliant temp or time value)	Staff closes app or avoids input	Logging feels like a test; behaviour avoided out of fear

Appendix E: Exploration of Behaviour Frameworks

COM-B Analysis by Behaviour Profile				
Staff Type	Capability	Opportunity	Motivation	Observed Behaviour
Core Staff	✔ Fully trained; understands expectations	✔ Full login access; app use integrated in shift	✔ High – sees logging as part of professional role	Some Log consistently but overburdened
Contract Flex	● Knows tasks, unclear on logging rules	✔ Has access but detached from internal systems	● Wants to help but hesitant to overstep	Performs actions, doesn't log unless prompted
Freelance Flex	✔ Skilled cook, understands procedures	✘ Sometimes no access or no direct assignment	✘ Low – logging isn't perceived as valuable	Often skips logging unless enforced
Transactional Flex	✘ Not trained, low system understanding	✘ No access or login; no role induction	✘ Doesn't view compliance as part of the task	Never logs; only performs physical tasks
Legacy Flex	✔ Fully trained; understands expectations	✔ Full login access; app use integrated in shift	✔ High – sees logging as part of professional role	Some Log consistently but overburdened

Insights per COM-B Domain

1. Capability

Flex and transactional staff often lack knowledge of what should be logged and why.  
Logging is perceived as a "management task" unless explicitly assigned.  
*"I don't think I'm at that level of responsibility yet."* — Contract Flex, Staff Kitchen

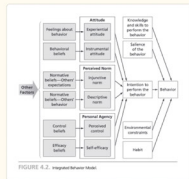
2. Opportunity

Physical access barriers (e.g. shared iPad, distant devices) prevent real-time logging.  
Social opportunity is inconsistent — some shifts assign a compliance lead, others assume someone will do it.  
*"I'll do it later... I don't have the iPad."* — Staff Restaurant Shadowing

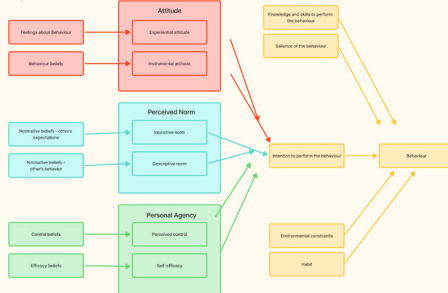
3. Motivation

Reflective motivation is low when staff perceive logging as redundant or without value.  
Some fear the consequences of incorrect input due to red error flags.  
*"I come in, look around, and only open the app an hour later... I start immediately with what has to go. Then I finish that first — then afterwards, I fill in the app."* — Cold Kitchen

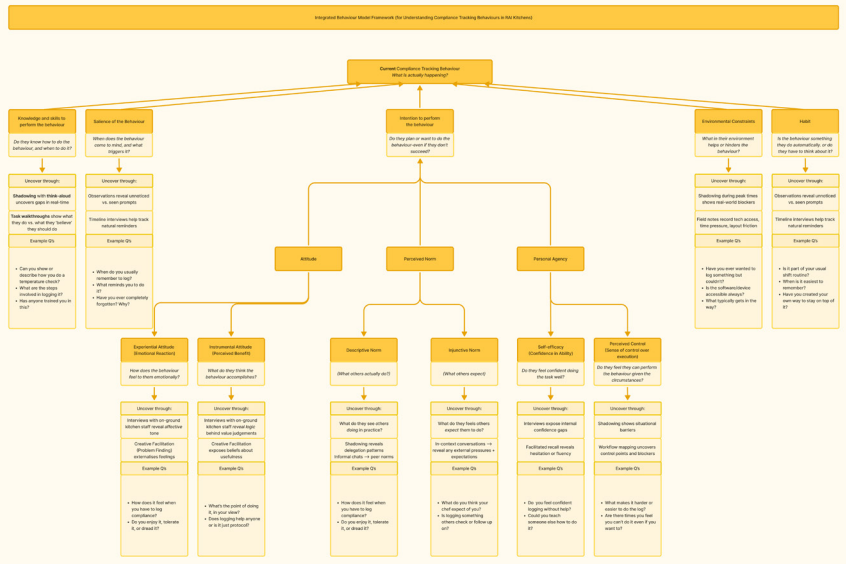


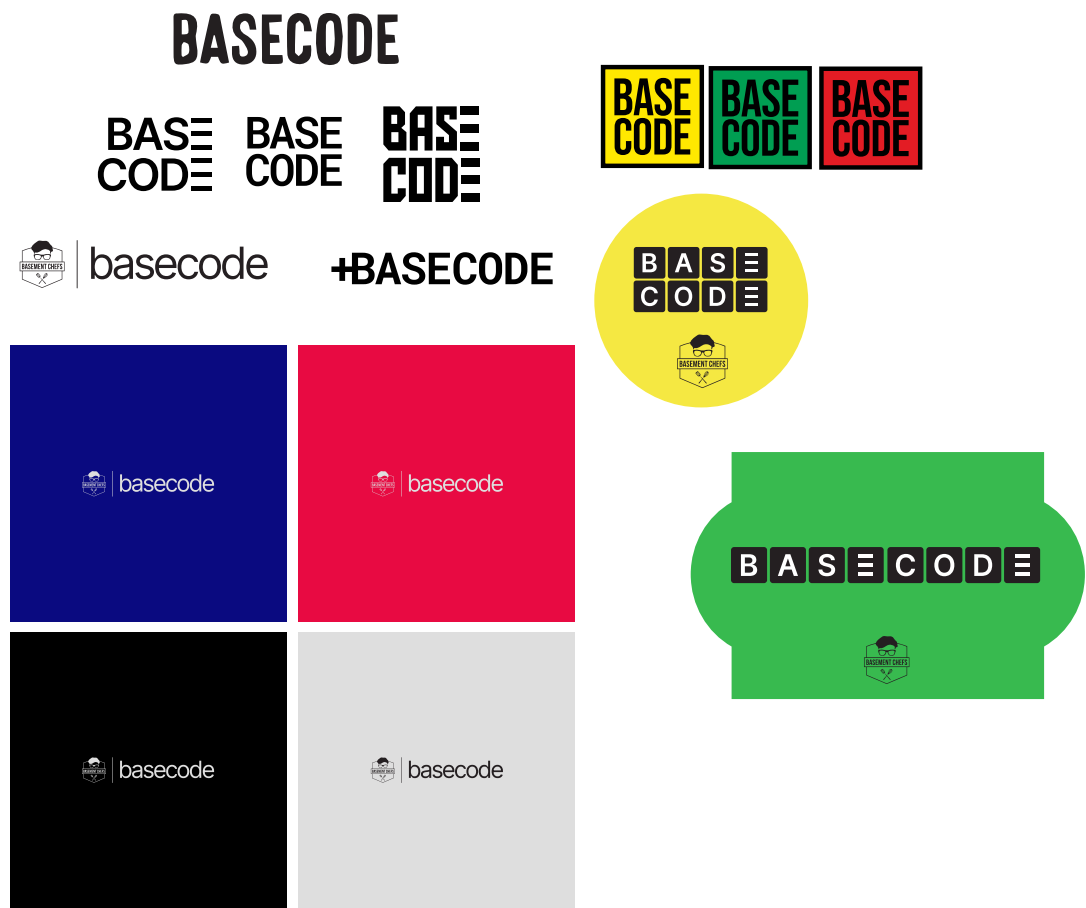


Integrated Behaviour Model



Integrated Behaviour Model





## Appendix G: Presentation to Kitchen Leadership Team

### Common Responses from Staff



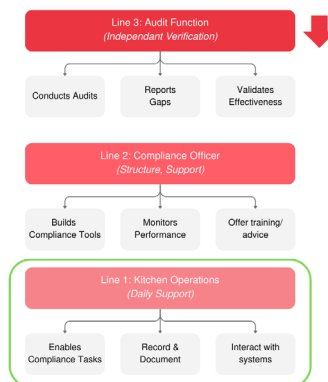
These aren't refusals, they're signals.

1/15

### Why this Matters: 3 Lines of Defence

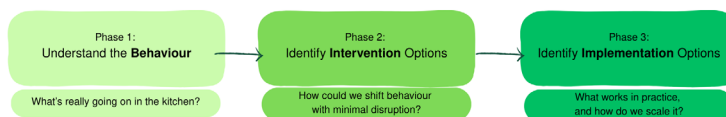
RAI's Compliance Systems and Tools are in place but the first line of defence **relies on people to act**.

Without behaviour, there's no record.  
Without a record, there's no evidence.





2/15

### Research Overview



3/15





## IDE Master Graduation Project

### Project team, procedural checks and Personal Project Brief

In this document the agreements made between student and supervisory team about the student's IDE Master Graduation Project are set out. This document may also include involvement of an external client, however does not cover any legal matters student and client (might) agree upon. Next to that, this document facilitates the required procedural checks:

- Student defines the team, what the student is going to do/deliver and how that will come about
- Chair of the supervisory team signs, to formally approve the project's setup / Project brief
- SSC E&SA (Shared Service Centre, Education & Student Affairs) report on the student's registration and study progress
- IDE's Board of Examiners confirms the proposed supervisory team on their eligibility, and whether the student is allowed to start the Graduation Project

#### STUDENT DATA & MASTER PROGRAMME

Complete all fields and indicate which master(s) you are in

Family name	Gopi		IDE master(s)	<input type="checkbox"/> IPD	<input type="checkbox"/> DfI	<input checked="" type="checkbox"/> SPD
Initials	G.G		2 <sup>nd</sup> non-IDE master			
Given name	Gayathri		Individual programme (date of approval)			
Student number	5992893		Medisign	<input type="checkbox"/>		
			HPM	<input checked="" type="checkbox"/>		

#### SUPERVISORY TEAM

Fill in the required information of supervisory team members. If applicable, company mentor is added as 2<sup>nd</sup> mentor

Chair	Ir. Bart Bluemink	dept./section	DOS	<p>! Ensure a heterogeneous team. In case you wish to include team members from the same section, explain why.</p> <p>! Chair should request the IDE Board of Examiners for approval when a non-IDE mentor is proposed. Include CV and motivation letter.</p> <p>! 2<sup>nd</sup> mentor only applies when a client is involved.</p>
mentor	Dr. Milad Hajjamlri	dept./section	DOS	
2 <sup>nd</sup> mentor	Rientz Mulder			
client:	RAI Amsterdam			
city:	Amsterdam	country:	Netherlands	
optional comments	Milad brings expertise in organisational change, co-creation, and stakeholder engagement with his ongoing collaboration with RAI Amsterdam. Bart's expertise in organisational strategy and servitization, supports the project's strategic direction and long-term impact.			

#### APPROVAL OF CHAIR on PROJECT PROPOSAL / PROJECT BRIEF -> to be filled in by the Chair of the supervisory team

Sign for approval (Chair)

**Bart Bluemink**

Digital ondertekend door Bart Bluemink  
Datum: 2025.02.17 18:12:38 +01'00'

**Bart Bluemink**

Name **Bart Bluemink**

Date **14 feb 2025**

Signature



## Personal Project Brief – IDE Master Graduation Project

Name student Gayathri Gopi

Student number 5,992,893

### PROJECT TITLE, INTRODUCTION, PROBLEM DEFINITION and ASSIGNMENT

Complete all fields, keep information clear, specific and concise

**Project title** Developing Strategy to Drive the Adoption of Sustainability and Food Safety Tracking Systems at RAI Amsterdam.

*Please state the title of your graduation project (above). Keep the title compact and simple. Do not use abbreviations. The remainder of this document allows you to define and clarify your graduation project.*

#### Introduction

*Describe the context of your project here; What is the domain in which your project takes place? Who are the main stakeholders and what interests are at stake? Describe the opportunities (and limitations) in this domain to better serve the stakeholder interests. (max 250 words)*

This project explores how RAI Amsterdam's Food & Beverage (F&B) operations can successfully integrate sustainability and food safety compliance tracking into daily workflows. As a major event venue, RAI must align with EU 2050 climate neutrality targets while ensuring compliance with food safety regulations. However, embedding these systems into existing operational structures remains a challenge, as regulatory initiative often compete with hospitality-driven priorities.

To address this, the project focuses on integrating tracking systems into standard procedures ensuring they are effectively used and embraced by F&B employees. Key stakeholders include RAI's corporate executive chef, Rientz Mulder, the Basement Chefs (F&B Employees), Sustainability / Compliance teams, and IT teams, whose engagement is critical to fostering adoption.

As part of a research project under Dr. Milad Hajiamiri at TU Delft's Design, Organisation & Strategy Department, this project will apply strategic design, systemic thinking, and co-creation methods to explore how sustainability and compliance tracking can be seamlessly embedded into RAI's daily operations. The goal is to develop a structured implementation strategy that ensures sustainability and compliance tracking become an intuitive and integral part of the organisation's workflow.

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## Personal Project Brief – IDE Master Graduation Project

### Problem Definition

*What problem do you want to solve in the context described in the introduction, and within the available time frame of 100 working days? (= Master Graduation Project of 30 EC). What opportunities do you see to create added value for the described stakeholders? Substantiate your choice.  
(max 200 words)*

Despite the necessity of sustainability and food safety compliance tracking, ensuring their consistent use within RAI Amsterdam's Food & Beverage operations remains a challenge. Workflow disruptions, competing priorities, and a lack of clear accountability hinder the seamless adoption of these systems, leading to inconsistent compliance practices and underutilisation of available tools.

A key barrier is the hospitality-first mindset, where immediate operational demands often take precedence over long-term regulatory commitments. Additionally, without a structured approach to integration, employees may view compliance tracking as an added burden rather than an embedded part of their daily workflow.

This project aims to identify the barriers to adoption, develop targeted interventions, and create a strategic roadmap that ensures these tracking systems become an intuitive part of RAI's operational culture. By leveraging strategic design and co-creation with key stakeholders, the project seeks to transform compliance from a top-down obligation into a shared responsibility, fostering long-term engagement and accountability.

### Assignment

*This is the most important part of the project brief because it will give a clear direction of what you are heading for. Formulate an assignment to yourself regarding what you expect to deliver as result at the end of your project. (1 sentence) As you graduate as an industrial design engineer, your assignment will start with a verb (Design/Investigate/Validate/Create), and you may use the green text format:*

*Design a strategy to drive the adoption of sustainability and food safety compliance tracking in RAI Amsterdam's Food & Beverage operations, ensuring seamless integration into daily workflows in the context of EU's 2050 climate neutrality regulations.*

*Then explain your project approach to carrying out your graduation project and what research and design methods you plan to use to generate your design solution (max 150 words)*

Project approach:

1. Problem Framing (Research & Context exploration): conduct desk research and stakeholder interviews to map workflows and identify adoption barriers.
2. Problem Re-framing (Analysis & Problem Refinement): synthesise findings to pinpoint compliance adoption challenges and refine the project focus.
3. Co-creation & Ideation: facilitate workshops to explore ways to embed tracking systems into daily workflows.
4. Prototyping & Testing: develop a strategic framework/roadmap and targeted interventions, testing feasibility through stakeholder feedback.
5. Refinement & Final deliverables: Refine the framework/roadmap, ensuring alignment with RAI Amsterdam's needs, and provide implementation recommendations for long-term engagement.



### Project planning and key moments

To make visible how you plan to spend your time, you must make a planning for the full project. You are advised to use a Gantt chart format to show the different phases of your project, deliverables you have in mind, meetings and in-between deadlines. Keep in mind that all activities should fit within the given run time of 100 working days. Your planning should include a kick-off meeting, mid-term evaluation meeting, green light meeting and graduation ceremony. Please indicate periods of part-time activities and/or periods of not spending time on your graduation project, if any (for instance because of holidays or parallel course activities).

Make sure to attach the full plan to this project brief.  
The four key moment dates must be filled in below

Kick off meeting	17 Feb 2025
Mid-term evaluation	11 Apr 2025
Green light meeting	6 Jun 2025
Graduation ceremony	4 Jul 2025

In exceptional cases (part of) the Graduation Project may need to be scheduled part-time. Indicate here if such applies to your project

Part of project scheduled part-time	
For how many project weeks	
Number of project days per week	

Comments:

Dates are tentative for now.

### Motivation and personal ambitions

Explain why you wish to start this project, what competencies you want to prove or develop (e.g. competencies acquired in your MSc programme, electives, extra-curricular activities or other).

Optionally, describe whether you have some personal learning ambitions which you explicitly want to address in this project, on top of the learning objectives of the Graduation Project itself. You might think of e.g. acquiring in depth knowledge on a specific subject, broadening your competencies or experimenting with a specific tool or methodology. Personal learning ambitions are limited to a maximum number of five.  
(200 words max)

This project aligns with my background, interests, and career goals in systemic design, organisational strategy, and experience-driven innovation. In my previous work experience, while working for a luxury multi-retailer in Hong Kong, I helped align digital and in-store experiences with new legal regulations, ensuring smooth adoption across customer touchpoints. This gave me a systemic perspective on regulatory-driven change and adoption strategies, directly relevant to embedding compliance tracking into RAI Amsterdam's Food and Beverage operations.

During the masters, undertaking electives such as Sustainable Consumer Behaviour, Creative Facilitation, Supporting Humans (Behaviour Change) and Generative AI, has equipped me with knowledge on behavioural adoption, engagement and stakeholder collaboration skills which are essential for ensuring long-term compliance adoption at RAI.

Personal learning ambitions:

1. Develop expertise in change management/systemic adoption strategies
2. Enhance co-creation and facilitation skills with corporate stakeholders
3. Apply behaviour change principles to compliance adoption
4. Translate strategic insights into actionable interventions
5. Gain experience in roadmap development for complex service ecosystems.