Building a *Mature* Food Safety Culture:

A Guide to Meeting GFSI Culture Standards

intertek alchemy

Authors:

Laura Dunn Nelson
Vice Chair, IAFP Food Safety Culture PDG;
VP of Food Safety & Global Alliances, Intertek Alchemy

Jeff Chilton
Certified SQF Consultant and Auditor, FSPCA and International HACCP Alliance Lead Instructor;
VP of Consulting, Intertek Alchemy

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Introduction

The term "food safety culture" has been commonly used for years by food companies, their suppliers, and distributors. The term is born out of an inherent sense of responsibility to provide safe food products to customers and, in the process, avoid costly recalls and lawsuits. Every company has a food safety culture, whether they realize it or not. But how mature is it? How is that even measured? And how can companies continue to develop and improve their food safety cultures, ultimately driving positive impact for their business?

Up until recently, that question was left to be answered by individual companies. At best, the term was nebulous and inconsistently defined and measured. At worst, it was glossed over entirely. That is until the Global Food Safety Initiative (GFSI) announced that food safety culture will be assessed as part of its 2020 GFSI Benchmark Requirements. This necessitated solid definitions and standards.

The GFSI board turned to a group of leading practitioners and scientists to help define "food safety culture" based on five dimensions:

GFSI believes to be successful and sustainable, food safety practices must be applied throughout an organization as defined by these dimensions, not just relegated to the designated food safety quality control/quality assurance teams. The "People" dimension has become more critical than ever as frontline workers represent the eyes, ears, and hands with the most direct connection to food safety and culture. Improving food safety performance requires changing and aligning employee behaviors.

Certification Program Owners (CPOs), commonly referred to as "scheme owners," such as BRCGS, SQFI, FSSC 22000, and IFS, are now adopting these principles and submitting their latest requirements for GFSI benchmarking and recognition.

Is your food safety culture mature enough to meet the new GFSI certification requirements? If not, what can you do to get ready? This document is intended to help you find out.

Purpose of this Paper

This paper will help explain the five GFSI dimensions so you can better assess the maturity of your food safety culture and set a course for continued improvement. We'll review various scheme owners and their certifications currently being benchmarked by GFSI to help you prepare for new audit requirements.

Perhaps most importantly, this paper will also share some practical implementation tips that you can apply at your facility to promote a strong food safety culture. These tips will serve to help companies meet audit requirements and bolster food safety programs, ultimately driving company success.

Laura Dunn Nelson

As a member of GFSI's Food Safety Culture Technical Working Group and Chair of the "People" subgroup, Laura helped draft the food safety culture guidelines set forth by GFSI. Currently, Laura is the Vice Chair of IAFP's Food Safety Culture Professional Development Group and a member of the BSI PAS 320 Food Safety Culture Steering Group. She has been a global ambassador for food safety culture, speaking on the topic around the globe as Intertek Alchemy's VP of Food Safety. Laura brings over 30 years of experience implementing food safety and quality control programs for processing, packaging, food service, and retail operations. Laura has worked with global retailers and manufacturers in the implementation of their food and workplace safety programs. She has also assisted food companies in the successful implementation of good manufacturing practices (GMP), quality assurance, and HACCP programs.

Jeff Chilton

Jeff has over 35 years of experience in the food industry, specializing in food safety, quality assurance, and plant management. Jeff has worked 23 years as a consultant, helping clients achieve and sustain GFSI certification under the SQFI, BRCGS, and FSSC 22000 standards, providing USDA and FDA Regulatory Compliance services for HACCP and Food Safety Plans and performing food safety training for the industry. Among other credentials, Jeff is a certified SQF Auditor, SQF Consultant, Preventive Control for Human Food Lead Instructor, International HACCP Alliance Lead Instructor, and NAMI Inspection Advisory / Scientific Affairs Committee Member.

FOOD SAFETY CULTURE

It’s more than a checklist.

Nearly every company large and small in the food ecosystem claims to follow some set of rules or practices for keeping food products safe. Their commitment to following food safety practices is essential to keeping food safe for consumers around the world.

the **World Health Organization** estimates that nearly

1 in **10** people are sickened by eating food processed or prepared by others

&

420,000 people die each year from **foodborne illness**[1]

Litigation and damaged brand reputation due to pathogen product contamination provides an incentive for improving food safety cultures. Past outbreaks of Listeria, for example, have cost companies millions over lawsuits, product recalls, and damage to their brands.

The fact that major illnesses can still occur even with the most stringent food safety rules demonstrates the complexity and fragmentation of our food delivery system. Written rules and regulations can be interpreted and applied quite differently

1 World Health Organization, Food Safety Fact Sheet, April 2020

depending on the industry, region, and individual people in charge of maintaining oversight. More daunting still, millions of frontline food workers have widely varying levels of experience, knowledge, and confidence in their own roles in protecting the global food supply.

Senior management certainly plays an important role in establishing the importance of food safety and providing the support to ensure employees have the knowledge and confidence to consistently follow the correct food safety behaviors. Employees at every level must know the difference between right and wrong food safety behaviors and have the confidence to make the right decision — even when no one is looking.

This is something that employees might instinctively know or can be effectively taught through observations, training, and demonstrations to show how wrong decisions negatively impact customers and their employers.

As GFSI describes it:

"Rules state facts; culture lives through the human experience."

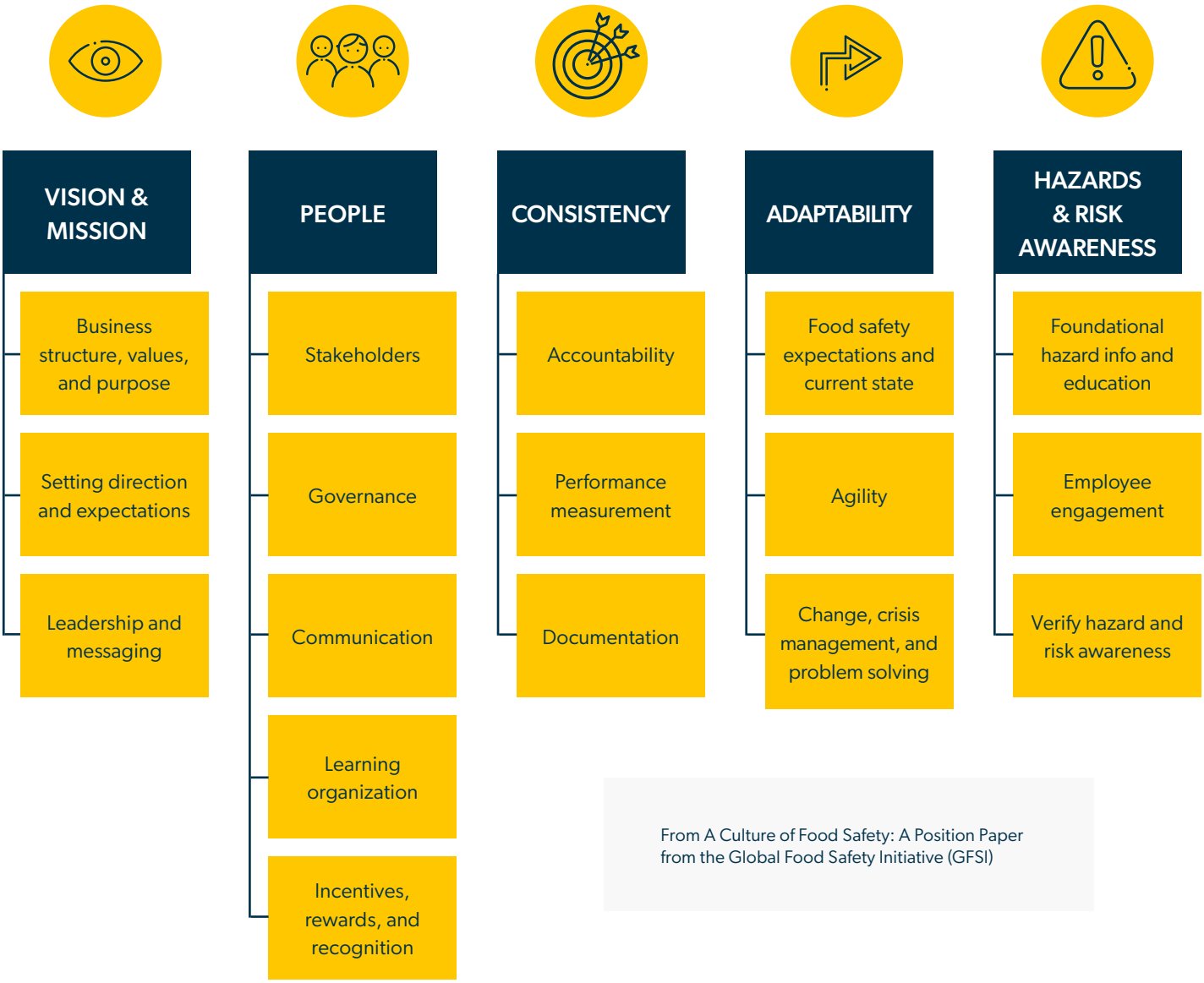
Using the GFSI five dimensions, companies can create awareness that changes and aligns worker food safety behaviors. Measurements of “awareness” and “behavior” are not as cut-and-dry as some compliance measures, which likely contributed to some of the early confusion around the food safety culture concept.

For comparison, whereas, an IT department might be judged by the number of security compliance measures they meet, a food safety culture is judged on GFSI’s five distinct dimensions. Furthermore, it’s generally accepted there are varying levels of maturity within a dimension, and it’s most likely that a single company has varying maturity levels across the five dimensions.

Maturity levels within a particular dimension can depend on several factors:

- The role leaders and managers play within an organization to achieve and maintain a food safety culture
- How well and how regularly food safety culture practices are communicated, and the metrics used to establish and gauge accountability
- A company’s level of awareness and adaptability to hazards and the steps needed to mitigate them

The diagram below shows GFSI's five dimensions of a food safety culture, along with critical components of each dimension. In the following section, this paper will examine each dimension individually.



From A Culture of Food Safety: A Position Paper from the Global Food Safety Initiative (GFSI)

STEPS TO ADVANCING MATURITY LEVELS OF GFSI FOOD SAFETY CULTURE

In this section we will examine each of the five GFSI food safety culture dimensions individually.

- **Vision and Mission**
- **People**
- **Consistency**
- **Adaptability**
- **Hazards and Risk Awareness**

We will first demonstrate observable characteristics that would represent a mature level of food safety culture for that particular dimension. Then we will outline a number of steps a company can take to advance its maturity within that dimension. Available food safety culture assessments will help you assess the level of your food safety culture maturity by identifying gaps and opportunities for maturing your culture within these five dimensions.

Vision & Mission

The Foundation for Your Food Safety Culture

A company's vision and mission statements are something determined and communicated by its senior management and board of directors. It's a comprehensive commitment covering the company's overall goals as it grows and delivers products and services to customers. Any food-related company should clearly have food safety prominently placed in its overarching vision and mission.

Employees and the entire senior management must embrace and practice a company's vision and mission. The expectations should be clear and easily understood. Simply writing vision and mission statements aren't enough, however. A company must bring it to life every day. This starts with executives and senior management visibly embracing the food safety components of the vision and mission. Employees have to see this from their leaders at every level of the organization. Likewise expectations of employees should be clear and understood, and leaders must provide the proper support their employees will need to comply.

Even as a company might alter business models, acquire other companies, or introduce new products, its commitment to food safety must remain a foundation for doing business.

As you gauge your level of readiness in this category, consider whether or not your senior leaders are engaged with food safety, what kinds of messaging or internal communications are being used, and if you can verify whether or not your entire company understands your food safety mission and vision.

Steps to Advancing Your Organization's Maturity Level: Vision and Mission

Food safety must be included to the company's vision and mission. But for food companies, while food safety may not be a competitive differentiator, it must always be part of the North Star for the company's vision and mission. The mission and vision must be clearly communicated to all employees and consistently reinforced and supported by all employees.

Give employees the power to "pull the cord." Pulling the cord is a reference to empowering employees to stop production when they see or notice something that could cause a faulty product or food safety risk. Made famous by Toyota to prevent defects that could lead to crashes, in food companies this is paramount to prevent foodborne illness. Leaders must make it clear to employees they should always report food safety risks immediately and leaders should positively recognize employees for identifying potential hazards and alerting their supervisors.

Clearly establish each employee's responsibility to food safety by articulating the expected food safety behaviors.

Share areas of concern with frontline workers. Workplace safety practitioners discuss "near misses" with employees as a pillar of their

safety programs. FSQA practitioners must do the equivalent. When employees understand the "why" behind their food safety behaviors, they can better internalize the reasons behind their food safety protocols. Ultimately, we want to encourage employees to bring ideas to leaders on how to improve food safety. And leadership must act upon this information in order to reinforce the importance and value of employee food safety communications.

Once in advanced maturity stages, challenge everyone to maintain this level of food safety vigilance and proactive awareness of potential food safety hazards. Again, borrow from workplace safety leaders who prominently display the number of days since the last lost time incident. Display how long it has been since a quality hold, GMP noncompliance, or pre-op inspection failure.

High Maturity

People

The Heart and Soul of Your Culture

When GFSI thinks of people in this category, it looks at key stakeholders and learning organizations along with the organization's governance, communications, and incentives/rewards/recognition programs. All of this is considered for the way it impacts their food production environment, from farm to fork, fishing boat to processing, packaging to distribution, and servers.

Cultures cannot live without people, and people cannot exist without developing some form of culture. Within the food industry, a safety culture should be evangelized from an employee's first onboarding session to their last day on the job.

Employee behaviors are developed and cultivated by what they learn and experience on the job. Their evolving attitudes are influenced daily by their training, their supervisors/

managers, their senior management, and their peers. This effort includes continual learning and communications to equip employees with the knowledge and the confidence to make the right food safety decisions — even when no one is looking. Use of effective coaching and recognition of compliant behaviors is a powerful tool to reinforce correct food safety actions by employees, and effectively promote a food safety culture.

Employees need to understand more than rules. They need to appreciate how their actions promote or diminish food safety. They must have a keen understanding of why they are responsible for food safety. Even then, their perceptions of food safety might be influenced by their own cultures, attitudes, values, beliefs, and — again — their peers. This is why it's important to remember there is no one-size-fits-all model for training and education.

Training has to reach and influence multiple demographics within an organization. It is critical to note that simply delivering training is not enough. Training effectiveness must always be measured and verified. In addition, training should be reinforced by the actions and behaviors of company leaders. They need to walk the talk and demonstrate the company's food safety culture day in and day out.

Steps to Advancing Your Organization's Maturity Level: People

Low Maturity

Get total buy-in from executives. This starts by educating senior leaders on food safety. At early maturity stages, this education may fall upon managers, HR, and FSQA personnel to help senior leadership understand what food safety is and how the food safety management programs positively impact the company's business outcomes. Make a presentation outlining the risks and rewards, such as:

- Average cost of food recall is $10 million in direct costs
- Improving culture can save a company up to $67 million for every 5,000 employees
- Include recent examples of recalls (available on USDA and FDA websites)
- Positive production and yield increases without costly quality holds or rework

Companies in stage one may be seeking initial GFSI certification to expand their customer base. This certification will require more formal food safety plans and food safety training program.

Enhance food safety training by including the "why" behind what to do. If this seems too daunting, partner with agencies and vendors that provide universally applicable food safety training courses.

Work to make sure food safety is universally seen as important by the senior management team. Start by adding food safety to the agenda of every senior team meeting.

Implement additional food safety communication channels beyond classroom training, such as food safety posters, video loops in breakrooms, and supervisor shift huddle guides to ensure continual food safety reinforcement.

Additional employee training materials should be added that go beyond basic food safety protocols and personal hygiene, such as topics covering allergens, foreign materials, pathogen awareness, facility defense, and HACCP basics.

Adding site-specific examples to the universally applicable food safety training courses will make the training more relevant to employees. For example, augment a general HACCP awareness course with plant specific information on your own critical control points and monitoring procedures. Companies can leverage course authoring software to aid in this effort, some of which require little more technical skill than using Microsoft PowerPoint.

Companies must go beyond documenting training attendance by verifying employees understand the training. A straightforward learning management system (LMS) is the easiest way to streamline this effort by automating knowledge checks to verify employee's food safety understanding.

Establish communication methods to keep executives updated on food safety program compliance. For example, this can include positive metrics on first-pass pre-ops and production without rework to reinforce the ROI on food safety.

Training should follow an annual learning plan based on a job task analysis. These learning plans should be role-specific to cover expected food safety behaviors.

Implement an employee reward and recognition program that encourages employees to identify and report food safety risks and celebrate teams that are consistently focused on food safety improvements.

Companies should invest in leadership development among their frontline workforce. This has long-term positive effects beyond food safety, of course. Having supervisors. upskilled in effective communication, change management, motivation, and coaching will also pay huge dividends for a company's food safety culture.

Executives and leadership should start looking outwards now that their company is on the right path. Attend food safety conferences, contribute to food safety forums and publications, engage in the dialogue. Executives should strive to see their company included when the industry seeks speakers or examples of food safety excellence. Employees will become proud of their food safety culture being recognized beyond their facility walls.

High Maturity

Establish measurements for food safety training in relation to company performance. Communicate these metrics during leadership meetings to ensure executives understand the ROI of training.

Consistency

Routine with Vigilance

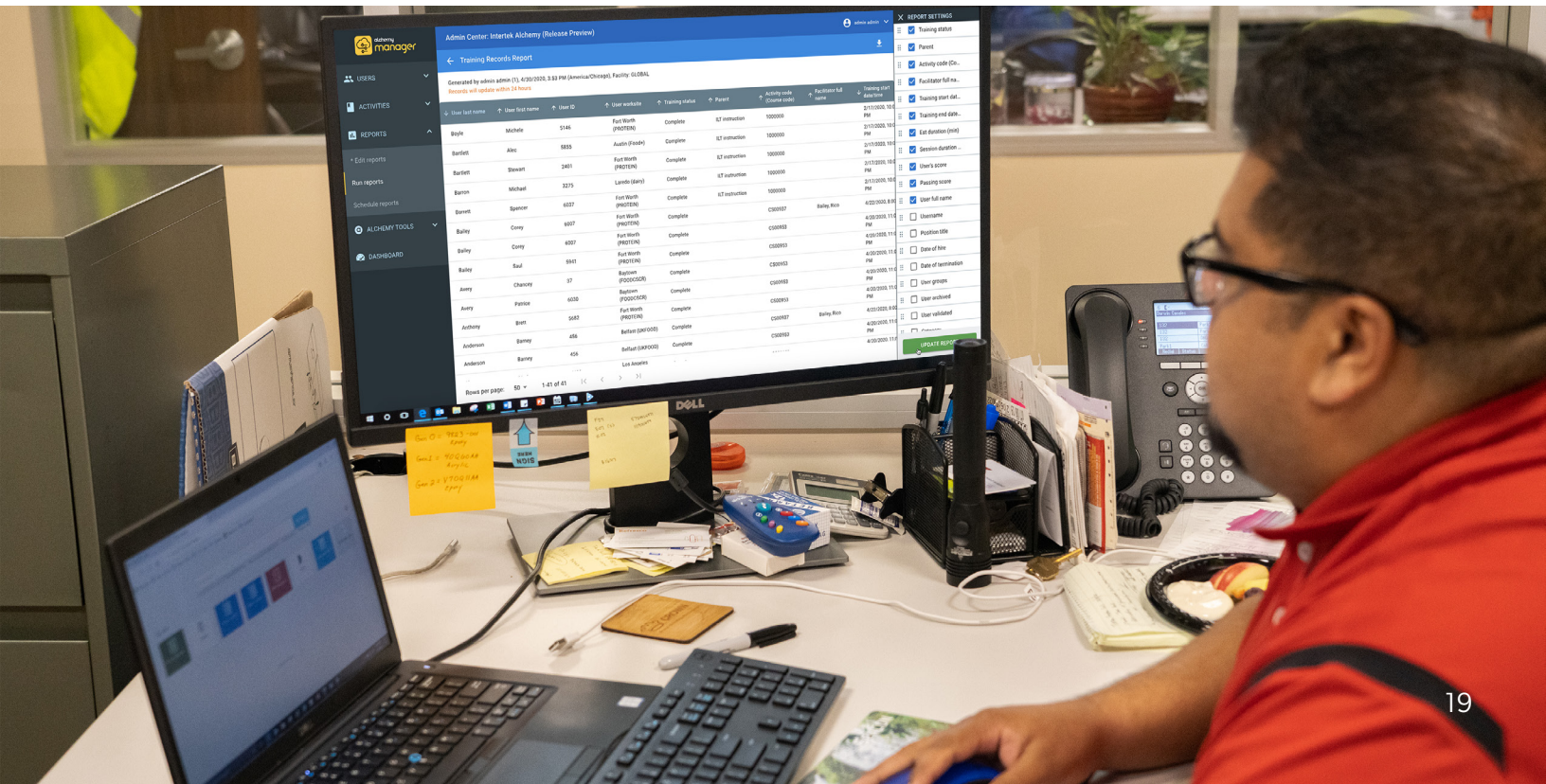
To maintain a consistent food safety culture, successful companies align their food safety priorities with people, technology, resources, and processes. They also apply, measure, and document consistently from top down, considering decisions, actions, and behaviors.

This discipline requires accountability across all levels of a company, requiring frontline workers and executive management to take responsibility for their decisions and actions. Employees must be comfortable to report food safety issues beyond their immediate scope of work, and know that all levels of employees around them can be held accountable for their actions.

The food safety performance of employees and managers should be measured with metrics that cascade throughout the company. Data should be collected and reviewed regularly to assess food safety trends, identify emerging risks, and to anticipate new food safety threats.

Data collection should be based on the organization's own needs and not simply the requirements from external audit requirements or regulatory expectations. And it should be documented evenly and applied broadly to enable informed decision-making around food safety.

Technology should be adopted to aid in the timely and accurate collection of data to improve food safety performance and program adherence. Focus should be on leading indicators vs. lagging indicators for proactive problem solving.



As companies look at their maturity level in this dimension, they should assess if all employees know their responsibilities and if they're being held accountable for their decisions and actions. How is their performance and compliance measured with company guidelines? And is their documentation capturing behaviors and best practices for others to follow? How do they collect and use data to control current and emerging food safety risks?

Employees should play an ACTIVE ROLE in the COLLECTION & REVIEW of data, problem resolution, and continuous improvement plans

Steps to Advancing Your Organization's Maturity Level: Consistency

Low Maturity

Companies should verify food safety training food safety behaviors are occurring on the floor. Mobile apps can help supervisors facilitate these food safety observations in accordance with standardized company principles. Any corrective actions should also be documented.

Proactively review paper-based data collection pointsin your operations and identify areas where plant management technology could yield compliance and productivity improvements.

Conduct a food safety culture audit by interviewing, assessing, and recording employee awareness and engagement levels with the company's food safety program. This assessment should be completed at each level of the organization from senior management to frontline employees to assess consistency of results. After establishing this baseline, conduct this audit regularly. Measure and analyze the trends, identify areas of opportunity, and set goals for improvement.

Add a measure connecting levels of food safety culture to ROI of training and overall company success. Only 31% of companies currently evaluate this measure, creating a significant opportunity to connect culture to the balance sheet.

Educate employees on appropriate methods of root cause analysis. Encourage root cause analysis of points of failure. Implement mitigation strategies and corrective and preventive actions then monitor for effectiveness.

Automate training records to proactively identify gaps, not just in training completion, but also understanding of training. The right learning management system (LMS) and courseware delivery mechanisms should make this automation quite simple.

Act upon the gaps identified with a pre-set plan of engagement, which could include refresher training, coaching, and on-the-job training.

Implement process/technology for horizon scanning for emerging food safety risks.

Adaptability

There's Strength in Nimbleness

A thorough and complete approach to a food safety culture provides a foundation for companies to quickly respond and adapt to changes in their environments. It provides the agility to assess and take advantage of opportunities, and also quickly mitigate threats.

To build an agile food safety culture, managers and directors must gain the support and commitment from their leaders and their workforce, quickly assess and address ongoing food safety threats, and be prepared to optimize food safety behaviors.

Companies have to know how quickly they can adjust their business structures and processes. Employees have the clear responsibility to make changes in food safety and are supported and rewarded for their decision-making. With a mature food safety culture, employees can adapt to issues more quickly by assessing potential threats, applying mitigation protocols without waiting for management directives, and lead the root cause assessment. Employees also participate in or lead the assessment of new mitigation protocols to ensure adaptations to the food safety program are effective.

When responding to change, companies must focus on food safety and apply that vision to their decisions. Employees need the appropriate change management skills to embrace their role in food safety continuous improvement plans and crisis management.

Once food safety improvements and best practices are identified by employees, they are communicated throughout the organization. Employees can respond quickly with oversight to ensure the right decisions are made. Some of this comes from lessons learned from past experiences and from watching other companies as they respond to a crisis.

Steps to Advancing Your Organization's Maturity Level: Adaptability

Low Maturity ↓

Establish an official change management process and train your leaders on it. Change management has become a mature discipline. But the boxes to check and steps to follow will be unique to each company's operations. If this is a first foray into this area, utilizing an external consultant would be a good idea.

Implement a document control and management program that tracks document changes, reasons for the change, and processes for changes.

Assess all data collection activities. Why are you collecting the data? How are you using the data? If the data is not being reviewed, trended, and leveraged for decision–making, it may not be useful to collect. Even worse, the data you are collecting and storing could be a future liability in the event of an adverse safety event.

Companies should reassess their food safety and HACCP plans to ensure they reflect your current operations. It is key to remember these are living documents that require refreshing. If it's been a while, there could take some work to make these key plans align with current operations.

Companies should strive to abandon reliance on paper documentation. SOPs are a good place to start. Simple technologies exist empowering companies to digitize their SOPs, making them readily available even on mobile devices. Among the key gains: any time changes are needed, it is simple to update in one central location so employees always access the most current version.

Companies without a Continuous Improvement Manager should appoint and train one. Preferably, this individual's only job is that of Continuous Improvement Manager. But even if adding this responsibility to an existing role, including this title and accompanying directives in their job description will ensure a trained specialist is available to the team for process guidance.

Leverage mobile technology to elevate an on-the-job training (OJT) program. This technology makes it easier to create job- or task-specific training courses that are easy for new hires to learn. It additionally makes it easier for companies to cross-train employees on new skills and food safety practices.

High Maturity

Enhance focus on your supply chain. There are a number of third-party platforms and subscriptions with voluminous databases of suppliers, grading their risk-level on a wide range of factors. This keeps your food safety teams current with new risks, and it provides a resource to quickly adapt to new suppliers if needed.

Hazards & Risk Awareness

Put Blind Spots in the Spotlight

From a high level, every company has some appreciation of the potential impact of hazards and risks to their customers. That perception might differ, however, based on how a food safety culture is deployed across the company.

Mitigating risk starts with a solid internal auditing program and senior-level focus on risk management. This is where a company's food safety and quality assurance team takes the helm. They are the subject matter experts trained for this purpose. But just as we have spent much of this paper extolling the need for food safety to be more than an FSQA responsibility, this holds true for risk mitigation too. FSQA leaders need to share food safety hazards with all employees for a mutual sense of risk awareness.

Without a clear understanding of the potential risks and threats, some employees, depending on their age, background, and culture, might not share the same sense of urgency and caution around potential hazards. It is critical to explain "why" food safety protocols and regulations are important. This requires establishing a clear comprehension of hazards and risks through effective employee training and education.

The "virtuous cycle" of this is that once this level of understanding and maturity exists among a company's frontline workforce, they truly become an omnipresent extension of the FSQA team.

A Clear
Understanding & Awareness of HAZARDS

Empowers Workers
to Identify Hazards as They Emerge

Employees should have the support of their supervisors to do so and should be positively recognized for sharing hazards. By recognizing and encouraging employees' ongoing role in identifying food safety risks, the organization relies less on external inspections for food safety compliance and more on internal food safety awareness and active engagement.

Steps to Advancing Your Organization's Maturity Level: Hazards and Risk Awareness

Low Maturity

Build a strong internal auditing process. Inspect yourself the way inspectors would, thereby proactively rooting out issues. A company just getting started with this can benefit from external training on internal auditing. This training can be on-site or remote, and there are even eLearning options available.

FSQA leaders must stay current on emerging food safety threats worldwide. They should compile reports, including potential impact to the company, presenting to senior leadership on a routine cadence.

Companies should put a microscope to their processes. If the company has adequate resources, risk assessments can be done internally. Or an external consultant can be utilized to provide an independent perspective. Some critical areas to consider are:

- Raw Material Hazard Analysis
- Process Hazard Analysis
- Food Fraud Vulnerability Assessment
- Foreign Supplier Verification Program Development or Supply Chain controls as applicable

Instill a "Near Miss" program for food safety. This is a common practice for workplace safety programs that track both accidents and near misses fastidiously. Workers are praised for calling attention to injury risks. This near-miss reporting should undeniably be adopted by FSQA. Keep in mind, the more near misses reported the better. This means a company's employees are comfortable calling out dangers that could potentially slow down production or compromise food safety standards. And more areas of risk are identified for correction.

Companies that utilize co-manufacturers should be applying the same rigor to each co-manufacturing facility.

Conduct an enterprise-wide food safety and regulatory risk assessment. This will be a comprehensive examination from the boardroom and C-suite to corporate systems analysis, from supply chain to distribution. A company may benefit from an external party for impartiality and thoroughness.

High Maturity

Understanding **THE AUDIT REQUIREMENTS** of CPOs

After GFSI established a food safety culture as a certification requirement, CPOs (or scheme owners) quickly began reviewing their standards for audits. Among some of the issues they address are new factors like mandatory unannounced audits, customer audits, and the need for continuous improvement.

Below is a synopsis of changes submitted to GFSI by several key scheme owners.

SQF Code Edition 9

New additions to SQF require senior site management to lead and support a food safety culture that ensures:

- The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures.
- Adequate resources (sufficient staffing, capital expenditures, training time) to meet food safety objectives.
- Food safety practices and all applicable requirements of the SQF System are adopted and maintained.
- Employees are informed and held accountable for their food safety and regulatory responsibilities.
- Employees are positively encouraged and required to notify management about actual or potential food safety issues.
- Employees are empowered to act to resolve food safety issues within their scope of work.

BRCGS Issue 9

Recent BRC Issue 9 updates continue to emphasize the importance of a positive product safety culture. This requires senior site management to define and maintain a clear path for the development and continued improvement of food safety and quality culture. This includes:

- Defining activities involving all sections of a site that impact product safety training
- An action plan indicating how the activities will be enacted and measured, and their intended time scales
- A review of the effectiveness of completed activities, including annual review of the food safety and quality culture system

IFS

New IFS code requirements involve changes to the governance and the commitment of a food safety culture. Under the new guidelines, senior management must develop, implement, and maintain a corporate policy that includes food safety and product quality, a focus on the customer, and a defined food safety culture.

The corporate policy must be communicated to all employees and should be broken down into specific objectives for the relevant departments. All relevant information related to food safety, product quality and authenticity must be communicated effectively and in a timely manner to relevant personnel.

Changes also require senior management to ensure the food safety and quality management system is reviewed at least once a year, or more frequently if significant changes occur. The reviews must include:

- Objectives and policies including elements of a food safety culture
- Results of audits and site inspections
- Positive and negative customer feedback
- Process compliance
- Authenticity and conformity issues
- Status of corrections and corrective actions
- Notifications from authorities

FSSC 22000

The new FSSC 22000 and the ISO 22000 standards do not explicitly call out a food safety culture, but it is implied across the entire standard. FSSC 22000 provides a food safety culture guidance document that breaks down all the clauses where food safety culture must be considered. FSSC 22000 leads with two GFSI guiding questions.

- When was your last food safety training and what did you learn? This requires a look into training records for evidence that personnel are competent when maintaining food safety and that they have participated in food safety training.
- How do you educate staff to understand the importance of hazard and risk management controls and the consequences of not following them? In this case, auditors will review programs to ensure employees are receiving the proper coaching and training to support a food safety culture.

PUTTING IT TO PRACTICE

A Practical Guide to Food Safety Culture Implementation

Now that we have explored the importance of developing a food safety culture, how can you meet audit requirements and regulatory expectations? How can you ensure every employee is committed to practicing the right behaviors all the time?

Earlier we looked at a wide range of suggestions specific to each dimension maturity. Here we provide a more focused list of 10 "must haves" to comply with GFSI food safety culture requirements. Each of the following components should be addressed.

Food Safety and Quality Policy Statement

Ensure this written policy includes statements related to:

- Senior management commitment to produce safe and high-quality products
- Management commitment to provide the staffing and resources necessary to ensure the production of safe and quality products
- Staff is informed and held accountable for their food safety and regulatory responsibilities
- Staff is positively encouraged and required to notify management of actual or potential food safety issues
- Staff is empowered to act to resolve food safety issues within their scope of work

The Food Safety and Quality Policy Statement must be displayed in prominent areas for employees and visitors to see. It must also be communicated to all employees in documented training sessions and with new employees during orientation.

Food Safety Objectives and Performance Measures

Food safety objectives must be formally defined and documented. Companies should define at least five to ten formal objectives. Once defined, performance measures must be established. Companies should monitor performance monthly or at least quarterly. Results should be shared and discussed in documented management reviews as inputs to the process.

Objectives can be defined around the topics of recall avoidance, external and internal audit results, customer complaints, Good Manufacturing Practices (GMP) compliance, microbiological specification compliance, regulatory compliance, training completion, employee turnover, absenteeism rates, and other metrics.

Food Safety Culture Program

Not all standards require a documented procedure. However, it is a best practice to document elements of your food safety culture. This written program can summarize elements such as Vision-Mission-Values, Food Safety and Quality Policy Statement, Food Safety Objectives and Performance Measures, Employee Training and Communications, Employee Engagement and Feedback Methods. It can also include specific statements or procedures related to each of the five GFSI disciplines of food safety culture, as well as procedures for culture surveys or assessments.

Sufficient Staffing

A company's organizational chart must demonstrate sufficient staffing to ensure food safety for QA, Sanitation, Maintenance and other departments as needed. Staffing must be adequate on each production shift as well. Designate individuals directly and indirectly responsible for food safety. Job descriptions for every position in the company should include statements to meet food safety and quality requirements, along with requirements for the GFSI scheme used at the facility.

Resource Summary

Create a document that lists capital expenditures related to food safety and quality, staffing expense, training time allocation, and other resources to demonstrate sufficient resources have been provided to assure food safety and quality.

Expand Policy Statement Training Programs

Communicate policy and food safety culture principles to new and existing employees on a regular basis. Consistently reinforce food safety culture messaging for ongoing awareness. Document all of this communication.

Reinforce Food Safety Principles Continuously

Develop ongoing food safety communications that reach all employees. Annual refreshers are not enough. Communications should be on a routine basis to continuously reinforce food safety expectations and the importance of food safety to the company.

Provide Systems for Two-Way Communications

Create methods for employees to notify management of food safety issues anonymously or by name via standard forms, suggestion boxes, apps, or other methods. Companies should keep a summary log of all information received and review it during monthly management meetings.

Promote Reporting of Potential Food Safety Risks

Companies should establish an employee recognition program that encourages employees to identify food safety concerns. Adopt a similar approach to "near misses" reporting widely practiced in Environmental, Health, and Safety. This reporting process needs to include documented actions taken by supporting team/ management on the concerns brought forth by employees. Supervisors should positively recognize employees who report food safety risks, and should never punish employees who report food safety risks, even if it causes lost product or time. Employees should help and encourage fellow employees to practice safe food handling practices, without waiting on management recognition.

Regular Meetings

Conduct regular meetings to communicate the company's food safety objectives and the results of performance measures to all employees to keep everyone informed and engaged.

Completion of the activities identified above will promote food safety culture throughout an organization and provide ample evidence to meet auditor expectations.

Food Safety Culture Assessment

Another method to build an even more robust food safety culture is to use formal assessments or surveys to measure food safety culture within a facility. While these are not required for audit standards or regulations, they are certainly considered a best practice to evaluate a food safety culture system and identify areas needing attention.

There are several food safety culture assessment tools on the market to facilitate this process. Some companies may opt to create their own survey with quantified responses. Alternatively, a company can engage an external food safety consultant to develop and conduct the survey. Whatever method you choose, it is wise to administer these assessments at all levels of the organization. Results for each group should be measured separately to assess consistency throughout the organization.

These assessments provide a great way to quantify food safety culture. It is recommended to repeat this process at least annually or bi-annually to create a baseline and identify continuous improvement or opportunities. This process can help document the increasing maturity of your food safety culture over periods of time.

Regulatory Adoption *of*

Food Safety CULTURE

Beyond GFSI, global regulatory agencies also recognize the link to a company's mature food safety culture and their potential reduction in food safety risks. Many agencies are actively promoting food safety culture. And regulatory audits are likely to cover food safety culture in the near future as well.

U.S. Food and Drug Administration (FDA)

The FDA has embraced food safety culture in significant fashion. It recently released New Era of Smarter Food Safety: FDA's Blueprint for the Future, stating that it "outlines the approach FDA will take over the next decade." This blueprint buckets modern food safety into four core elements — "Food Safety Culture" is one of those elements.

The FDA identified these three subcomponents of the Food Safety Culture Core Element:

1. Promote food safety culture throughout the food system.
2. Promote further food safety culture throughout the agency.
3. Develop and promote a smarter food safety consumer education campaign.

Certainly, as the FDA continues this promotion and provides resources for awareness and training of agency personnel, food safety culture will receive much more attention in the future. Companies will need to demonstrate strong food safety culture to regulators in addition to just meeting audit requirements.

Codex Alimentarius Commission

Codex Alimentarius — the collection of internationally recognized food safety standards, codes of practice, and guidelines — revised its General Principles of Food Hygiene document to include elements important to achieve a food safety culture.

One significant change found in the section Management Commitment to Food Safety:

"Fundamental to the successful functioning of any food hygiene system is the ***establishment and maintenance of a positive food safety culture*** acknowledging the importance of human behavior in providing safe and suitable food."

European Commission

The European Commission also added food safety culture to its regulations. This revision includes asking management and their employees to commit to an appropriate food safety culture that includes a clear distribution of responsibilities, appropriate training and supervision, verification that controls are performed timely and efficiently, and documentation is up to date.

Food Standards Australia New Zealand

Food Standards Australia New Zealand (FSANZ) has distributed its Food Safety Questionnaire as a "health check" of a business's food safety culture. FSANZ cited it as "a national resource for industry and food regulators." The questionnaire follows a similar format to GFSI, covering topics such as vision, workforce, staff knowledge, and technology on a sliding scale.

FINAL THOUGHTS & RECOMMENDATIONS

Food safety culture has evolved from the nebulous perspective of the past to the current state of defined processes and quantifiable results. It will continue to evolve at an even a faster pace as audit standards and regulatory emphasis increase. Food safety culture is an imperative element of a company's food safety system that must be addressed. All companies must take the following actions moving forward:

- **Review Programs –** Senior management and food safety teams should evaluate their company's level of food safety maturity considering all the new information, requirements and expectations.
- **Reassess Programs –** While a knowledgeable "food safety culture champion" will likely be imperative to keep culture moving forward, their driving objective should be to make food safety everyone's responsibility. Continuous improvement teams should be established and trained on food safety culture. Mitigation strategies, based on dimension gaps determined by food safety culture assessments, must be implemented and measured for success.
- **Re-evaluate Programs –** Food safety culture strategies should be re-evaluated at least annually to assure they are effective and drive continuous improvements.
- As companies continue their food safety culture journey, they will recognize its importance to employee engagement, teamwork, communications, process management, and recall and outbreak avoidance. All of these add untold, intangible value to a company.

A strong, robust **Food Safety Culture** is the right thing to pursue for every food company throughout the supply chain.

People *make the* Difference

Intertek Alchemy is the leading global expert in engaging frontline workers to become the driving force for food safety. Its wide range of training, coaching, and communications solutions are used in over 4,000 food manufacturing facilities worldwide.

Intertek Alchemy has been a driving force in the emergence, evolution, and adoption of Food Safety Culture since the company's inception in 2005. Its leaders and subject matter experts have authored hundreds of published articles, webinars, and conference presentations on the topic, and sit on numerous boards and steering committees devoted to Food Safety Culture, including contributing to the GFSI position paper defining Food Safety Culture.

Intertek Alchemy's consultants provide organizations with food safety culture assessments, action plans, and training to sustain a mature food safety culture.

(866) 463-5117

ContactUs@IntertekAlchemy.com

IntertekAlchemy.com

intertek alchemy