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Build a *Mature*Food Safety Culture
that Meets GFSI
Audit Standards



#### **Today's Speakers**



#### **Laura Dunn Nelson**

Vice Chair, IAFP Food Safety Culture PDG; BSI PAS 320 Food Safety Culture Steering Committee 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



#### **Agenda & Objectives**

- 1 Understanding Food Safety Culture
- 2 Steps to Advancing Maturity Levels of GFSI's Culture Dimensions
- 3 Understanding Audit Requirements
- 4 Practical Guide to Food Safety Culture Implementation
- 5 Available Resources
- 6 Q&A



#1

# **Understanding Food Safety Culture**





#### A (Very) Brief History of Food Safety Culture

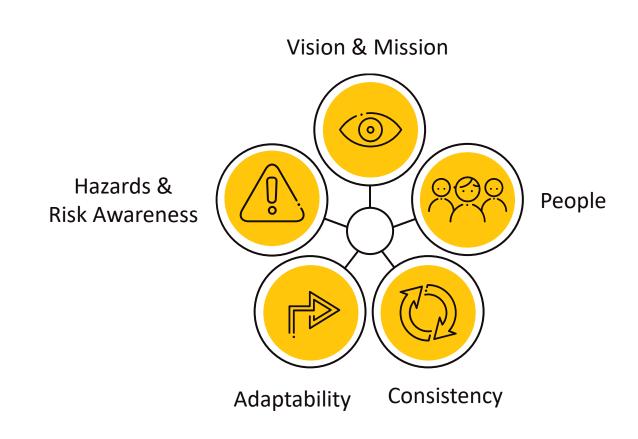
- Food safety culture (FSC) has been strong concept for many years
- Lacked recognized standards, consistent definitions, or identified targets
- This changed in 2018: A Culture of Food Safety: A Position Paper from the Global Food Safety Institute (GFSI)
- 2020 GFSI announced food safety culture will be assesses as part of its Benchmark Requirements
  - BRCGS Issue 8 added FSC to audits in February 2019
  - SQF Code Edition 9 adds FSC to audits in May 2021
  - IFS Issue 7 added an element for FSC in March 2021
  - FSSC 22000 issued FSC guidance document in 2020. ISO
     22000:2018 must be implemented by June 29, 2021





#### **GFSI's Definition of Food Safety Culture**

- Food safety culture defined by five "dimensions"
  - Vision & Mission
  - People
  - Consistency
  - Adaptability
  - Hazards & Risk Awareness
- Every company has varying levels of maturity in each dimension
- Food safety practices must be applied throughout an organization: every role, everybody





#### **Understanding & Adoption are on the Rise**

#### **Glass Half Full**



**114% increase** in companies conducting Food Safety Culture Audit (from 14.4% to 30.8%)\*



**60% lift** in using culture level to measure value of training (19.1% to 30.5%)\*



of leaders understand how to build a strong culture

#### **Glass Half Empty**



of companies aren't conducting Food Safety Culture Audits



of companies aren't using culture to measure value of training



of leaders don't understand how to build a strong culture



Of those that do, understanding doesn't equal implementation



believe despite all efforts they still have employees not following food safety program



#2

# Steps to Advancing Maturity Levels of GFSI's Culture Dimensions





#### **VISION & MISSION**

Business structure, values, and purpose

Setting direction and expectations

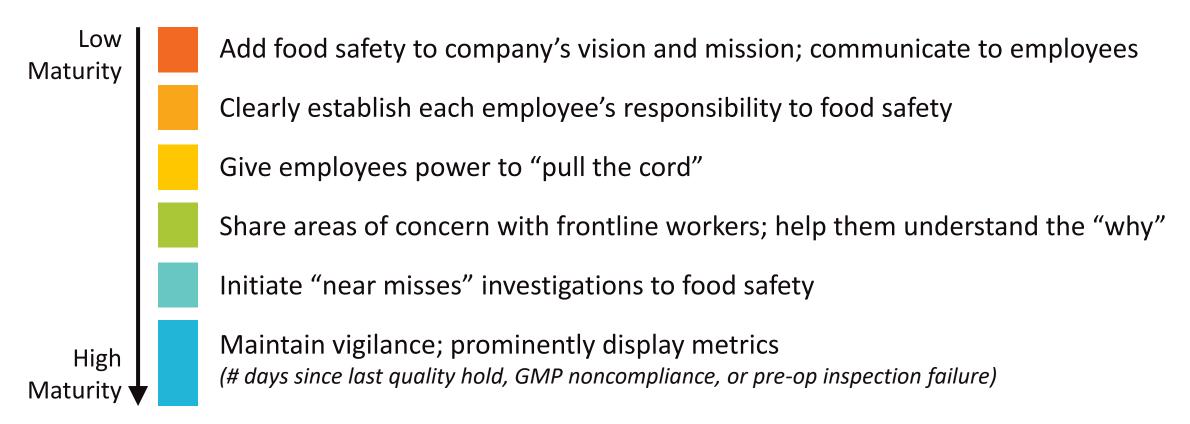
Leadership and messaging

#### **Vision & Mission: The Target**

- Any food-related company should clearly have food safety prominent in overarching vision and mission
- All employees, senior executives to hourly workers, must embrace and practice the vision and mission
  - Executives and senior management visibly embrace food safety
- Expectations of employees are clear, understand, visible
- Writing statements aren't enough; company and people must bring it to life every day



#### **Vision & Mission: Advancing Maturity**







#### **PEOPLE**

Stakeholders

Governance

Communication

Learning organization

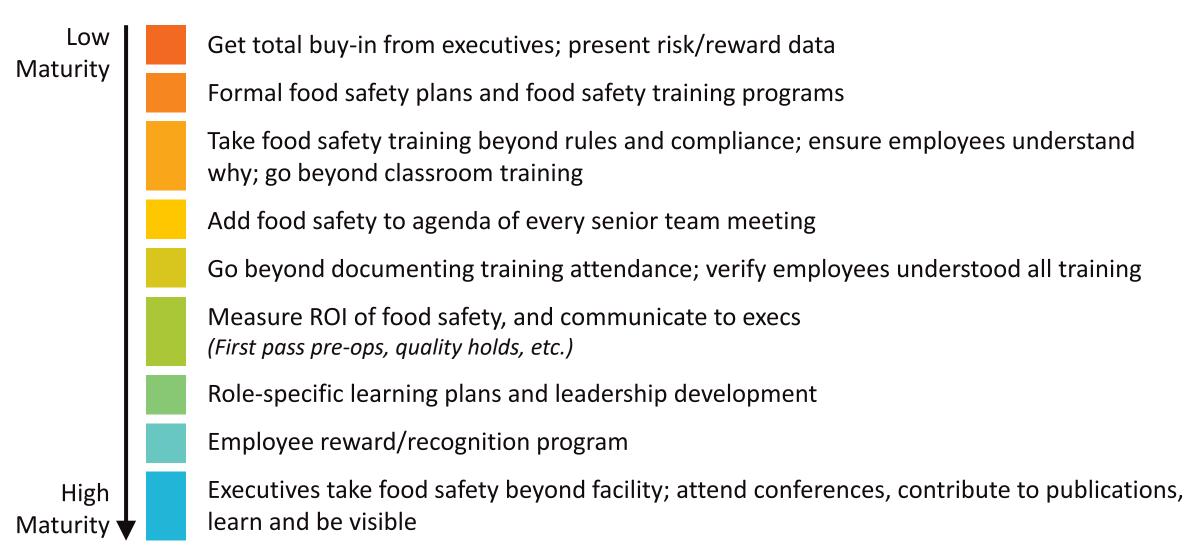
Incentives, rewards, & recognition

#### **People: The Target**

- Employees consistently make the right food safety decisions – even when no one is looking
- Training efforts include continual learning
- Employees understand more than rules
- Training effectiveness is measured and verified
- On-the-floor coaching and reinforcement are standard
- Compliant behaviors and proactive actions are recognized/rewarded
- Training and culture efforts are applicable and understood to all demographics/nationalities in an organization
- Senior leaders walk the talk



#### **People: Advancing Maturity**







#### **CONSISTENCY**

Accountability

Performance measurement

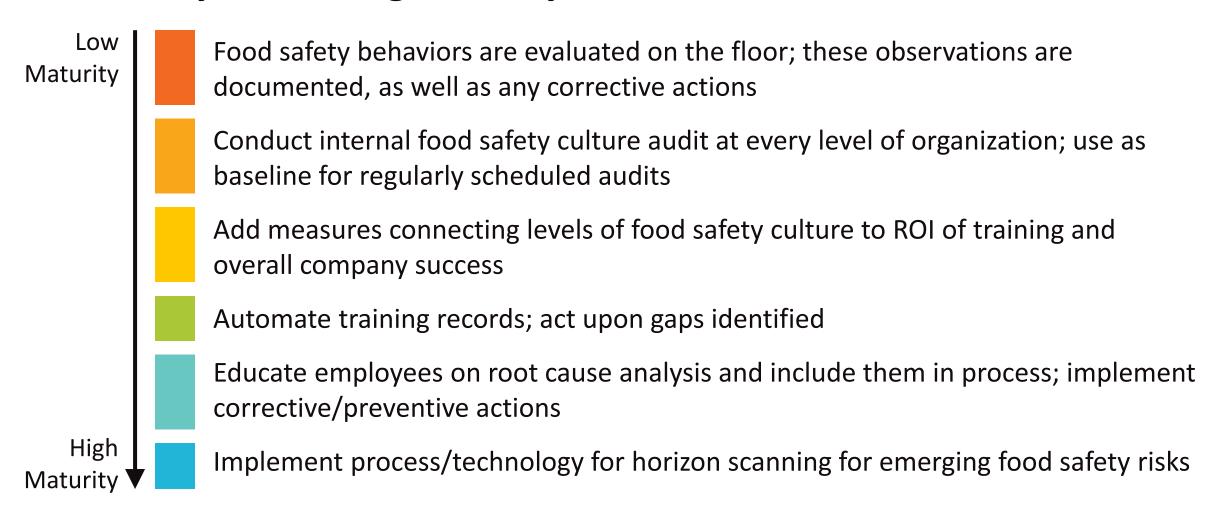
**Documentation** 

#### **Consistency: The Target**

- Accountability exists across all levels of a company
- Employees are comfortable reporting food safety issues beyond their immediate scope of work
- Food safety performance is measured, metrics analyzed and reviewed throughout organization
- Data/metrics based on company's own needs, not just standards to meet audit requirements
- Technology is in place to aid in data collection and analysis
- Employees play active role in problem resolution and continuous improvement plans



#### **Consistency: Advancing Maturity**







#### **ADAPTABILITY**

Food safety expectations and current state

**Agility** 

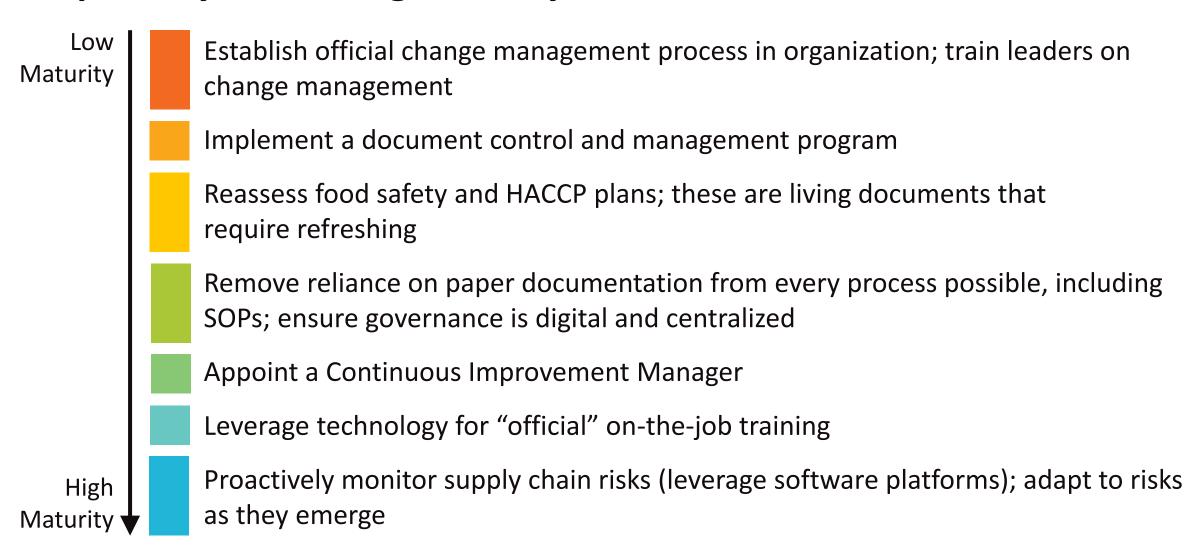
Change crisis management and problem solving

#### **Adaptability: The Target**

- A foundation is in place for quick response and adaptation to a change in company's environment or supply chain
- Employees participate in, or lead, the assessment of new mitigation protocols
- Change management as a discipline is understood with the processes and principles in place
- "Post mortems" are routine part of corrective/preventive actions or incident response, lessons learned are documented and easily retrieved for future reference
- Companies review and discuss the response of other companies as they respond to their own crises



#### **Adaptability: Advancing Maturity**







## HAZARDS & RISK AWARENESS

Foundational hazard info and education

Employee engagement

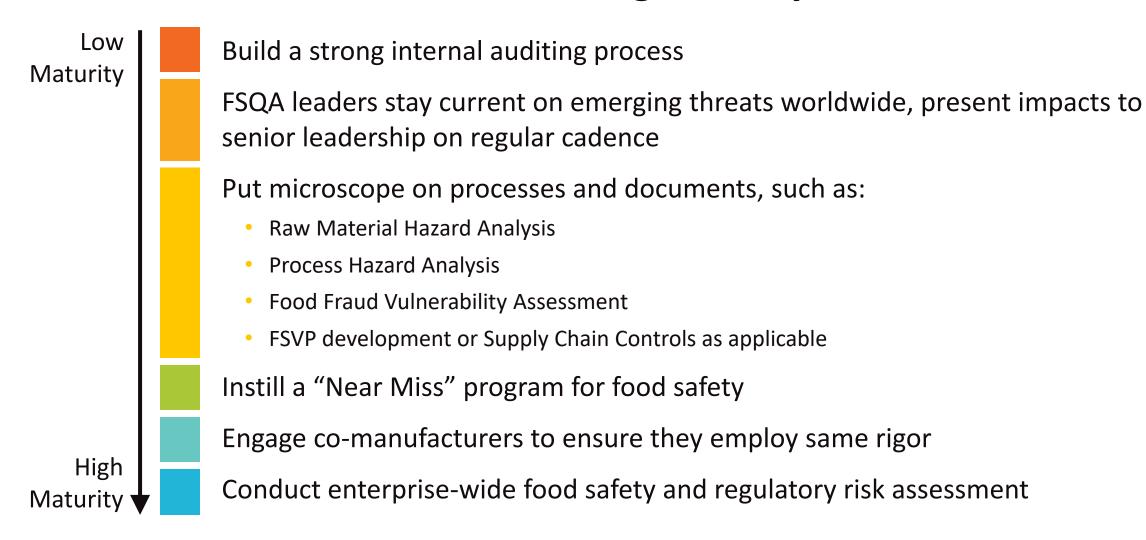
Verify hazard and risk awareness

## Hazards & Risk Awareness: The Target

- Solid internal audit program on regular cadence
- Risk management focus includes senior-level engagement
- FSQA leaders share food safety risks/hazards, even to frontline workers
- Employees are capable, and have the support, to bring forward food safety risks
- Company relies less on external inspections for food safety compliance, and more on internal food safety awareness and active engagement



#### **Hazards & Risk Awareness: Advancing Maturity**





#3

# Understanding Audit Requirements





#### **Audit Requirements: BRCGS Issue 8**

- Requires site's senior management provide clear path for development and continual improvement of food safety and quality culture
- Define activities involving all sections of a site that impact product safety training

- Create an action plan indicating how the activities will be enacted and measured, and their intended time scales
- Complete a review of the effectiveness of completed activities



#### **Audit Requirements: SQF Code Edition 9**

- Establish, document, and communicate food safety objectives and performance measures to all relevant staff
- 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



#### **Audit Requirements: IFS**

- 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
  - is communicated to all employees if timely, effective manner
  - is broken down into specific objectives for relative departments

- Food safety and quality management system is reviewed annually (or more frequently if changes occur), including:
  - 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



#### **Audit Requirements: FSSC 22000**

- Provides food safety culture guidance document breaking down all clauses where food safety culture must be considered
- FSSC 22000 leads with two GFSI leading questions:
  - When was your last food safety training and what did you learn?
  - How do you educate staff to understand the importance of hazard and risk management controls and the consequences of not following them?



#4

# Practical Guide to Food Safety Culture Implementation



# 10 MUST-HAVES for

# GFSI

# Food Safety Culture COMPLIANCE

- 1) Food Safety & Quality Policy Statement
- Pood safety objectives and performance measures
- 3) Food safety culture program
- 4) Sufficient staffing
- 5) Resource summary
- 6) Expand policy statement training programs
- 7) Reinforce food safety principles continuously
- 8) Provide systems for two-way communications
- 9) Promote reporting of potential food safety risks
- 10) Regular meetings to communicate food safety objectives and results



#### **Food Safety Culture Assessments**

- Formal survey with all levels of employees
- Measures current state of food safety culture at a facility
- Creates baseline metrics, illuminates areas for improvement
- Enables organizations to quantify food safety culture
- Conduct at least annually or bi-annually
  - Recommend shortened 6-month interval after first assessment
- Documents maturity of culture over time



## Regulatory Emphasis on Food Safety Culture

#### FDA "New Era for Smarter Food Safety" Blueprint

https://www.fda.gov/food/new-era-smarter-food-safety/new-era-smarter-food-safety-blueprint

- Tech-enabled traceability
- Smarter tools and approaches for prevention and outbreak response
- New business models and retail modernization
- Food safety culture

#### **FDA Increasing Emphasis**

- Increased awareness for regulators and industry
- Food safety culture training for regulators
- Evaluation of food safety culture during food safety assessment inspections

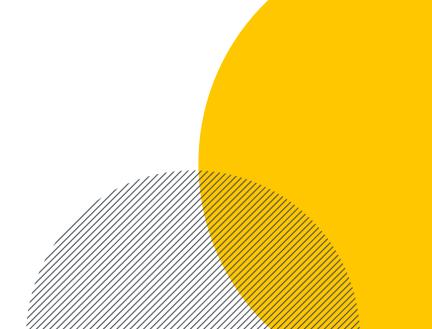




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## **Available Resources**





#### **Alchemy Consulting Food Safety Culture Services**





- Food safety & HACCP plan development or re-analysis
- Change management consulting
- GFSI audit prep and gap analysis



#### Audit/ Assessment

- Measure and evaluate baseline culture
- Develop and implement action plan
- Establish goals, metrics, and communication plan



## ILT / VILT Training

- Root cause analysis
- Corrective/Protective Actions
- PCQI & HACCP
- Internal auditor training
- Food safety culture training



### Risk Mitigation

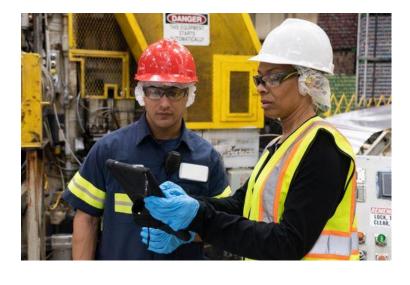
- Raw Material Hazard
  Analysis
- Process Hazard Analysis
- Food Fraud Vulnerability Assessment
- FSVP development



#### **Intertek Alchemy Courses and Technology**







#### **Training**

- 100+ multilingual food safety training courses; easily customizable
- Develop role-specific learning plans
- Standardized on-the-job training app
- Leadership development training

#### **Verification**

- Verify & document employee understanding
- Automated recordkeeping and paperless documentation
- Proactively identify gaps and potentially risky employees

#### Reinforcement

- App for on-the-floor behavior observations & corrective actions
- Supervisor aids for consistent training reinforcement
- Digitize SOPs for easy access, retrieval, guaranteed consistency





## Thank You!