

Food Compliance Culture

Implementing and Managing Food Compliance Culture Concepts

Development

To define detail, scope and purpose.

Development

This information can be used to develop food safety and quality programs that meet the requirements of modern Regulatory, Customer and Industry Standards:

- We take the time to explain the expectations and requirements of food safety and quality compliance as these relate to your food safety and quality programs.
- You may choose to use our Premium Resources to build, enhance or upgrade your food safety and quality program.
- We encourage you to share this webpage with any food compliance associates and peers you believe may benefit from our commitment to providing our users with user-friendly information and resources to achieve a superior Food Compliance Culture.
- We welcome your suggestions for additions of general or specific content through the haccp.com Contact Page.

Key Definitions for Food Compliance Culture

- **Accountability:** The obligation of a person or team to answer for their actions and decisions, and to accept responsibility for the outcomes within their role in the food business.
- **Competency:** Competency is the collection of skills, knowledge, and attributes to perform, usually described in terms of observable and measurable behaviours. The measurement parameters of Competency are often expressed as an individual's ability to objectively apply their skills, knowledge, and attributes expected as elements of their position within a food business.
- **Continuous Improvement:** To raise the performance of an organisation through an ongoing process of identifying and improving missions, goals, objectives, and action strategies through activities that may include but not be limited to internal reviews, internal or external assessments, service user feedback, complaints, and other service delivery issues.
- **Food Compliance Culture:** Food Compliance Culture is the cumulative outcome of human beliefs and behaviours within a food business and the meaning people attach to those beliefs and behaviours.
- **Food Safety Culture:** The shared values, beliefs and norms that influence mindset and behaviour toward food safety across a food business. It is the term most commonly used in Codex and Global Food Safety Initiative guidance, and in this guide it is used interchangeably with Food Compliance Culture.
- **Key Performance Indicator or KPI:** A quantitative or qualitative measure that enables the overall delivery of a service to be assessed against the goals or targets set by an entity in its strategic plan.
- **Knowledge:** Knowledge is a familiarity with facts, truths, and principles that is sufficient and appropriate for the production of safe and suitable foods.
- **Leadership:** The capacity of senior management and supervisors to set direction, model the expected behaviour and motivate people to meet the commitments in the food safety and quality policies.
- **Management Commitment:** Direct participation by the highest-level executives in a specific and critically important aspect or program of an organisation.
- **Resources:** Assets available and anticipated for operations, including people, time, skills, knowledge, technology, data, money, equipment, facilities, and other assets used to plan, implement and evaluate food safety and quality and operational systems.
- **Skills:** A skill is the ability to actively and sufficiently participate in tasks that ultimately result in safe and suitable foods being produced.
- **Stakeholder:** A stakeholder is a person or entity with an interest or concern in something, especially a business. In the context of Food Compliance Culture, a Stakeholder may include any business employee or associate.

- Training: The term training refers to the acquisition of knowledge, skills, and competencies as a result of the teaching of vocational or practical skills and knowledge that relate to specific useful competencies.

Food Compliance Culture Development

When considering the development, documentation, and implementation of Food Compliance Culture within food safety and quality management systems, the following information should be considered to ensure effective outcomes:

About Food Compliance Culture

Food Compliance Culture is the cumulative outcome of human beliefs and behaviours within a food business and the meaning people attach to those beliefs and behaviours.

Food Compliance Culture is closely aligned with the concept commonly known as food safety culture in guidance from the Global Food Safety Initiative and Codex.

Food Compliance Culture determines how different levels of staff communicate with one another as well as how employees deal with clients and customers.

As an element of contemporary food business management practices, the methods for implementation and management of a strong Food Compliance Culture vary from business to business and site to site. As such, it is difficult to 'measure' levels of Food Compliance Culture within any given organisation.

At haccp.com, we consider the following concepts to be critical to the implementation and management of a strong Food Compliance Culture:

Strong Inspirational Leadership



Visible and engaged leadership sets the direction for food safety and quality across the whole business.

“Senior Management leads the way by willingly committing to the implementation and management of ‘best practice’ Food Safety and Quality Programs!”

Leadership is essential for any food business to meet customer and regulatory requirements and to continuously improve as a business operation. Strong leadership allows the quality objectives of the food business to be met with appropriate and sufficient support that filters from the senior management of the business through to all of the employees and contractors.

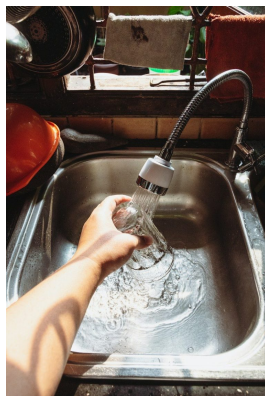
The benefits of Strong Inspirational Leadership include:

- Establishing and maintaining a unity of purpose which identifies the direction the business should take;
- Creating an environment in which participants are encouraged to achieve the business' objectives whilst maintaining integrity;
- Achieving unification in the evaluation, alignment, and implementation of business activities;
- Reducing miscommunication within the business;
- Setting goals and targets which facilitate meeting customer requirements and continuous improvement;
- The recognition of people's contributions to the business through encouragement and inspiration;
- Maintaining an environment of trust which is exclusive of fear;
- Creating and maintaining shared values and ethical role models at all levels of the business;

- Promoting a proactive environment of trust which drives positive behavioural change;
- Embedding of values that achieve the documented commitments within the Food Safety and Quality Policies.

A statement of commitment or quality policy statement is often used to define the business' commitment to meeting the objectives defined by legislative, industry, customer, and moral requirements.

Management Commitment



Simple tasks such as handwashing show whether the food safety program is working in daily practice.

"All levels of Business Management demonstrate their commitment to the Food Safety and Quality Policies by providing the human and financial resources required to facilitate them!"

An understanding of and commitment to the food safety program by senior management is paramount for any food safety and quality program to work effectively. Without management commitment, product safety, and quality, and indeed the success of the business operation could be in jeopardy. Demonstrated commitment from management also flows down to other levels within the organisation, creating insight for everyone working with the product and processes. When this flow is effective, the ultimate safety and quality of the finished product are improved, often along with productivity and profit. The Management Commitment processes within leading food businesses are strongly linked to the Continuous Improvement Process.

You can't manage what you can't measure! Every food business must establish formal mechanisms for confirming whether or not their business is achieving the commitments stated within their documented Food Safety and Quality Policies:

- Key Performance Indicators are one way through which food businesses may measure the strength of Food Compliance Culture;
- Another basic application for the measurement of Food Compliance Culture is to observe and record the completion of elemental tasks such as handwashing: if tasks such as handwashing are not completed appropriately, this indicates immediate issues with the implementation of the Food Safety and Quality Program;
- internal and external audit outcomes can also be used to measure a food business' 'expectations' versus 'outcomes' against rigid compliance criteria.

Stakeholder Engagement

"Everyone within the Food Business believes in the Food Safety and Quality Policies and plays a role in their implementation!"

The involvement of people is one of the most important factors in integrating and maintaining effective food safety and quality management system. Without the appropriate and adequate involvement of people, food safety and quality requirements cannot be met in a manner that facilitates the basic objectives of the quality management system.

The benefits of involving people include:

- Enhanced participation through encouraging and motivating the involvement of all people, regardless of their position, skill, or knowledge level;
- Development of people to ensure both the business and the people involved benefit from participation;

- Increasing the opportunity for innovation and creativity within the business objectives;
- People become more accountable for their performance within the holistic sense of business operation;
- People become eager to participate in continual improvement activities.

Employee participation should be encouraged throughout all aspects of any food business' operational food safety and systems. This not only provides a genuine sense of worth for employees but also provides an opportunity to gather insight into the working elements of the business. Ways in which employee participation can be achieved include:

- Voluntary inclusion opportunities for employees within small project groups;
- Providing a mechanism through which employees can voice their opinion regarding the efficiency and effectiveness of operational business systems;
- Allowing employees to nominate hazards, which may include food safety, food quality, workplace quality, and workplace health and safety hazards;
- Encouraging employees to identify constraints to their performance, and to evaluate their performance against their personal goals and objectives;
- Allowing employees to freely share knowledge and experience, and to discuss problems, issues, and opportunities for improvement.

key suppliers and service providers may also be considered 'Stakeholders' in the context of Food Compliance Culture due to their scope of business interactions and related outcomes.

Acknowledged and Enforced Accountability

"Everyone within the Food Business understands their role and responsibilities and is responsible for their actions!"

Encouraging a strong sense of Acknowledged Accountability within the mindset of food business employees, visitors and contractors is a vital element of maintaining a Food Compliance Culture. Contemporary Food Safety and Quality Programs must permit transparency in communication and training activities to ensure high levels of general and specific awareness of accountability. All levels of business management can support outcomes by ensuring employees are aware of their role and responsibilities and are unencumbered when it comes to providing constructive feedback regarding the implemented Food Safety and Quality Program.

Accountability must be enforced to ensure the content and context of the documented Food Safety and Quality Policies are met at all times.

Effective communication mechanisms provide a clarity of purpose for all food business stakeholders.

Knowledge is Power



Training gives each team member the skills and knowledge needed for their role in the food business.

"Everyone within the Food Business understands relevant Food Safety and Quality Risk and does the right thing every time!"

Personnel engaged in food operations that come directly or indirectly into contact with food should be trained, and/or instructed in food hygiene to a level appropriate to the operations they are to perform. Training is fundamentally important to any food hygiene system. Inadequate hygiene training, and/or instruction and supervision of all people involved in food-related activities pose a potential threat to the safety of food and its

suitability for consumption. All personnel should be aware of their role and responsibility in protecting food from contamination or deterioration. Food handlers should have the necessary knowledge and skills to enable them to handle food hygienically. Those who handle strong cleaning chemicals or other potentially hazardous chemicals should be instructed in safe handling techniques.

The nomination of training as a component of a Food Safety and Quality Program is to assess the skills and knowledge of participating personnel roles in Food Safety activities. Training does not always need to be formal or accredited, as skills and knowledge may be gained in different ways. However, regulators and customers may require evidence of training for specified roles. Many jurisdictions require food businesses to ensure that food handlers have the skills and knowledge for their tasks and to nominate a food safety supervisor. Australia, for example, applies Standard 3.2.2A (Food Safety Management Tools) to many food service, catering and retail food businesses. Persons managing or participating in food handling and/or processing operations must possess skills and knowledge concerning the scope of their workplace activities.

The skill and knowledge requirements for each staff member should correspond directly with the scope of work activities. The skills and knowledge required by a chef are different from those required by a cleaner. Skill and knowledge-based training may be considered in numerous forms, and it must involve food hygiene as well as general food safety concepts.

It is the responsibility of management to ensure that all employees are fully aware of food safety and food hygiene practices that are important to their job in the food business.

Facilitating Continuous Improvement

"Everyone within the Food Business participates proactively by identifying and communicating opportunities for improvement of the Food Safety and Quality Program. Senior Management implement opportunities for improvement to prevent the recurrence of Food Safety and Quality Program failures!"

Continuous improvement is all about developing and maintaining systems through which the business can always improve. The term continuous improvement refers to an ongoing need to improve the effectiveness of a management system. The effectiveness of any food safety or food quality system can be continually improved through the use of communications, management reviews, internal audits, corrective actions, system updates, and verification and validation activities.

Continuous Improvement is more of a philosophy than a process or system. It requires everyone in the food business, from senior management through to operational team members to adopt a mindset of continuously looking for ways to improve processes and systems by making them efficient and effective. In most contemporary food businesses, continuous improvement usually takes the form of process improvement activities or projects. A process improvement activity or project is a planned and structured activity to improve a process so that one or more of its outcomes are replaced by a more efficient or effective outcome.

Continuous Improvement relies on the following attributes to ensure success in the intended scope and purpose of the application:

- A commitment by all staff to continuous improvement of processes, products, courses, and services;
- Input and involvement of all stakeholders in identifying and implementing quality Improvements;
- Systematic use of qualitative and quantitative feedback as the basis for identifying and prioritizing improvement opportunities.

The benefits of continuous improvement include market leadership through managing and applying a commitment to continually improving business performance, the ability to ensure customer requirements are met, and customer expectations are exceeded through flexibility and quick reaction to customer demand, consistency in the business approach to improving operational capabilities, increased participation from people through training in the tools and methods of continual improvement, the ability to measure continuous improvement through the establishment of goals and targets, and through the acknowledgment of improvement activities.

Promoting and Maintaining a Strong Food Compliance Culture

Within contemporary Food Safety and Quality Management Systems, the promotion and maintenance of a strong Food Compliance Culture are one of the key roles of the senior management team.

Where the senior management team actively considers Food Compliance Culture within the scope of Management Commitment and mandates actions to address deficiencies and to support improving outcomes, the related food business will benefit in many different ways!

Basic applications of Food Compliance Culture maintenance and enhancement may include:

- Provision of human and financial resources to consistently achieve the production of safe and quality foods;
- Genuine, relevant training and development opportunities for all staff;
- Internal communication processes and mechanisms that allow an unrestricted flow of information between all Staff and the senior management Team. This may include confidential and anonymous communication processes and mechanisms where required.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Compliance Culture Development requirements in relation to their items.

Measuring Food Compliance Culture

Food Compliance Culture cannot be measured with a single number, but a combination of indicators gives a reliable picture of how well the commitments in your food safety and quality policies are being met in practice. Measures are most useful when they are agreed in advance, reviewed on a schedule and acted on.

Common indicators and methods include:

- Leading indicators: Completion rates for training, scheduled verification activities and corrective actions, and the time taken to close them;
- Observed behaviours: Direct observation of tasks such as handwashing, correct use of protective clothing and following work instructions, recorded against agreed criteria;
- Staff feedback: Surveys, suggestions, hazard reports and near-miss reports, including how quickly management responds;
- Lagging indicators: Audit findings, customer complaints, non-conforming product, product holds and recalls, reviewed for repeat issues;
- Management review: Regular review of these measures by senior management, with documented decisions and resources allocated to improvement.

Measures of Food Compliance Culture are indicators, not proof. Read the results together and use them to improve systems and support people, rather than to assign blame.

Regulatory and Industry References

The following official sources support the concepts on this page. Always check the current edition and the requirements that apply in your jurisdiction and to your customers.

- Food Safety Management Tools (Standard 3.2.2A, Australia): An example of national requirements for food safety supervisors, food handler training and substantiation of controls in certain food service, catering and retail businesses;
- Global Food Safety Initiative announcement of version 2.0 of its food safety culture position paper: A framework for understanding, assessing and improving food safety culture;
- Codex Alimentarius codes of practice: Includes the General Principles of Food Hygiene, which cover management commitment and food safety culture.

Food Compliance Culture Development Key Points

- Food Compliance Culture programs must be developed to meet relevant Regulatory, Industry, and Customer standards and requirements;
- The senior management of your business facilitates a commitment to ensuring adequate resources for the

development of your Food Compliance Culture program;

- Should you require additional resources for the development of Food Compliance Culture program elements, please discuss this with the relevant senior management representative;
- A properly developed Food Compliance Culture program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly-developed Food Compliance Culture program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Documentation

To establish the developed detail in a viewable format to facilitate information.

Documentation

Document: A document provides guidance and/or direction for performing work, making decisions, or rendering judgments that affect the safety or quality of the products or services that customers receive.

Documented policies, procedures, work instructions, and schedules form the basis of any food safety and quality management system. The following documentation formats may be considered to ensure ongoing compliance with specified requirements for Food Compliance Culture:

- Food Compliance Culture policy;
- Food Compliance Culture development procedures;
- Food Compliance Culture implementation procedures and work instructions;
- Food Compliance Culture monitoring procedures;
- Food Compliance Culture corrective and preventative action procedures;
- Food Compliance Culture verification schedule;
- Food Compliance Culture verification procedures;
- Food Compliance Culture validation schedule;
- Food Compliance Culture validation procedures;
- Food Compliance Culture training procedures.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Compliance Culture Documentation requirements in relation to their items.

You may wish to visit the Food Compliance Culture Templates section of haccp.com for examples of Food Compliance Culture documentation, record, and resource formats commonly applied within food safety and quality systems.

Food Compliance Culture Documentation Key Points

- Food Compliance Culture programs must be documented to meet relevant Regulatory, Industry, and Customer standards and requirements;
- All documented Food Compliance Culture program elements must be controlled to ensure compliance;
- Key documented Food Compliance Culture program elements should be available to your business team at all times to ensure they can facilitate required tasks;
- A properly documented Food Compliance Culture program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly documented Food Compliance Culture program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Implementation

To facilitate the application of the documentation.

Implementation

Implementation: Implementation is the application of documented food safety and quality system elements into the actual business operation.

The implementation of a Food Compliance Culture within any food business requires genuine commitment from senior management, staff, and visitors to ensure the nominated goals of implementation are achievable on an ongoing basis. It is a step that requires significant planning and consideration of general and specific food business circumstances to ensure the outcomes of Food Compliance Culture do not negatively impact the safety and quality of the food items dispatched from the business.

Implementation of Food Compliance Culture must include a clear definition of responsibilities and authorities for all levels of participation by senior management, staff, and visitors to the site.

When implementing Food Compliance Culture within the food safety and quality system, you may wish to consider the following requirements before completion:

- Communication and display of the Food Compliance Culture policy;
- Completion of Verification and Validation of Food Compliance Culture development procedures;
- Availability of Food Compliance Culture implementation procedures and work instructions;
- Availability of Food Compliance Culture monitoring procedures and record templates (where applicable);
- Availability of Food Compliance Culture corrective and preventative action procedures and record templates (where applicable);
- Availability of the Food Compliance Culture verification schedule;
- Availability of Food Compliance Culture verification procedures;
- Availability of the Food Compliance Culture validation schedule;
- Availability of Food Compliance Culture validation procedures;
- Completion of Food Compliance Culture training procedures;
- Completion of product design and development requirements related to Food Compliance Culture;
- Completion of process design and development requirements related to Food Compliance Culture;
- Completion of training for team members who have responsibilities and involvement within Food Compliance Culture;
- Completion of competency approval for team members who have responsibilities and involvement within Food Compliance Culture.

Application of the Food Safety and Quality Program

The Food Compliance Culture plan is the Food Safety and Quality Program, and it is the roadmap to success.

Common points will need to be considered to facilitate implementation:

- Allocation of responsibility for the management and supervision of the Food Compliance Culture plan, monitoring of critical control points, record keeping, and documentation;
- Allocation of resources for the plans to be suitably implemented;
- Development of simple but clear work instructions for the monitoring of Key Performance Indicators;
- Development of recording sheets and other documentation;
- Training and education for staff based on the requirements of the Food Compliance Culture plan, including work instructions indicating what, how, when, and who should do what;
- Allocation of responsibility for decisions on corrective and preventative actions.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Compliance Culture Implementation requirements in relation to their items.

Food Compliance Culture Implementation Key Points

- Food Compliance Culture programs must be Implemented to meet relevant Regulatory, Industry, and Customer standards and requirements;
- Your Food Compliance Culture program must be fully implemented as per relevant documented Policies, Procedures, and Work Instructions;
- The implementation of Food Compliance Culture requires a commitment to the provision of resources by the senior management of your business;
- A properly implemented Food Compliance Culture program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly implemented Food Compliance Culture program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Monitoring

To review, confirm and document evidence of the implementation against documented limits.

Monitoring

Monitoring: Monitoring is the act of reviewing and confirming measurable parameters of a defined process or product status.

Monitoring requirements within food industry sectors are generally identified against limits of acceptability defined within Food Compliance Culture plans, implementation procedures, and work instructions. Monitoring usually includes some element of record-keeping, which may be maintained manually or through digital systems. It is important to consider that advancements in technology have spawned many systems and processes which are self-monitored and/or self-adjusted when variances are identified. Regardless of the system used, the goal of any monitoring activity is to provide sufficient evidence that any limit of acceptability has been met.

Traditional Food Compliance Culture monitoring requirements include manual recording and the application of corrective actions when the results of monitoring are found to be outside acceptable limits. Corrective Actions should also generally be strongly linked to the monitoring process where applied to ensure full traceability of the applied actions.

Common monitoring activities and record formats may apply to Food Compliance Culture:

- Food Compliance Culture Monitoring Records: The monitoring activities for Food Compliance Culture Key Performance Indicators are, in their intent, designed to provide evidence of alignment with the Food Safety and Quality Policies.
- Observation records: Periodic observation of day-to-day behaviours, such as handwashing, correct use of protective clothing and adherence to work instructions, recorded against agreed criteria.
- Key Performance Indicator reviews: Regular review of Key Performance Indicator results and trends, with the reasons for any change recorded.
- Audit and inspection results: Internal, customer, regulatory and certification audit outcomes, tracked for repeat findings.
- Complaint and incident trends: Customer complaints, non-conforming product and incident records reviewed for patterns that point to behavioural or systemic causes.
- Staff feedback: Suggestions, hazard reports and near-miss reports raised by employees, and the time taken to act on them.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Compliance Culture Monitoring requirements in relation to their items.

You may wish to visit the Food Compliance Culture Templates section of haccp.com for examples of Food Compliance Culture documentation, record, and resource formats commonly applied within food safety and quality systems.

Food Compliance Culture Monitoring Key Points

- Monitoring provides real-time confirmation and evidence that your risk-based FS&Q Controls are effectively implemented;
- Food Compliance Culture programs must be monitored to meet relevant Regulatory, Industry, and Customer standards and requirements;
- Monitoring of Food Compliance Culture must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Nominated monitoring records for Food Compliance Culture must be maintained as per relevant documented Policies, Procedures, and Work Instructions;
- A properly monitored Food Compliance Culture program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly monitored Food Compliance Culture program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Corrective Action and Preventative Action

To apply “real time” interventions to documented monitoring limits.

Corrective Action and Preventative Action

Corrective Action: Corrective action is mandatory action to be taken when a deviation to the Quality System occurs, particularly to a Critical Control Point.

Preventative Action: At any step in the process where a hazard has been identified, preventative action must be put into place to prevent re-occurrence.

Corrective Action and Preventative Action are implemented to ensure that any identified non-conformance issues are documented, investigated, and rectified within appropriate time frames. Corrective action is any action applied to regain control over a product, process, policy, or procedure that has been identified as being non-conforming or outside nominated limits of acceptability. Preventative action is any action applied to prevent any identified non-conformance from reoccurring.

The outcomes of corrective and preventative actions should result in regained process control after effective application. Specified corrective actions are commonly linked to the Food Compliance Culture Plans and the food business certification process.

Below are Corrective Action and Preventative Action examples which may be associated with Food Compliance Culture related non-conformance:

- Review of the Food Compliance Culture policy;
- Review of Food Compliance Culture development procedures;
- Review of Food Compliance Culture implementation procedures and work instructions;
- Review of Food Compliance Culture monitoring procedures;
- Review of Food Compliance Culture corrective and preventative action procedures;
- Review of the Food Compliance Culture verification schedule;
- Review of Food Compliance Culture verification procedures;
- Review of the Food Compliance Culture validation schedule;
- Review of Food Compliance Culture validation procedures;
- Review of Food Compliance Culture training procedures;
- Re-training in Food Compliance Culture;
- Review of management review activities to include Food Compliance Culture as an agenda item;
- Initiation of product hold procedures where safety or quality may be compromised;
- Initiation of a product recall or product recall procedures where investigations show that there is a substantial safety and or quality risk to the released product;

- Contacting stakeholders including customers regarding any confirmed or potential Food Compliance Culture concerns involving their product.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Compliance Culture Corrective Action requirements in relation to their items.

You may wish to visit the Corrective Action and Preventative Action section of haccp.com for examples of best practice applications for this food safety and quality system element.

Food Compliance Culture Corrective Action and Preventative Action Key Points

- The implementation of Corrective Action and Preventative Action provides confidence that your FS&Q Program is effectively implemented and that FS&Q criteria are being met;
- Where deviations or variations are observed, Corrective Action and Preventative Actions must be facilitated to meet relevant Regulatory, Industry, and Customer standards and requirements;
- Corrective Action and Preventative Action of Food Compliance Culture must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Records of Corrective Action and Preventative Action for Food Compliance Culture must be maintained per relevant documented Policies, Procedures, and Work Instructions;
- Proper application of Corrective Action and Preventative Action for your Food Compliance Culture program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- Poor application of Corrective Action and Preventative Action for your Food Compliance Culture program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Verification

To review and confirm documented monitoring and corrective actions against documented parameters.

Verification



Scheduled checks and reviews confirm that food safety controls are being applied as documented.

Verification: The act of reviewing, inspecting, testing, checking, auditing, or otherwise establishing and documenting whether items, processes, services, or documents conform to specified requirements.

Verification is the detailed review of all food safety and quality system elements to confirm that they are effectively developed, documented, implemented, monitored, and reviewed. All food safety and quality system elements, including documented policies, procedures, training, Food Compliance Culture plans, and their operational applications must be verified on an ongoing scheduled basis. The verification process commonly includes a defined schedule for which verification activities are required, how often they are conducted, who is responsible, and detailed documented procedures for each nominated verification activity.

The general goal of an established verification process is to ensure any systemic non-conformance issues are identified and rectified within an appropriate time frame. When non-conformance issues are identified through the

verification process, Corrective Actions and Preventative Actions should be implemented to ensure they do not impact the effectiveness of the food safety and quality system.

The following examples of verification activities may apply to Food Compliance Culture:

- Review of the Food Compliance Culture policy;
- Review of Food Compliance Culture development procedures;
- Review of Food Compliance Culture implementation procedures and work instructions;
- Review of Food Compliance Culture monitoring procedures;
- Review of Food Compliance Culture monitoring records;
- Review of Food Compliance Culture corrective and preventative action procedures;
- Review of the Food Compliance Culture verification schedule;
- Review of Food Compliance Culture verification procedures;
- Review of the Food Compliance Culture validation schedule;
- Review of Food Compliance Culture validation procedures;
- Review of Food Compliance Culture training procedures;
- Review of Food Compliance Culture performance since the last review and historically;
- Analytical testing of product or process to ensure the effectiveness of Food Compliance Culture;
- Inclusion of Food Compliance Culture as an agenda item within the Management Review Process.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Compliance Culture Verification requirements in relation to their items.

You may wish to visit the Verification Activities section of haccp.com for examples of best practice applications for this food safety and quality system element.

Food Compliance Culture Verification Key Points

- Your verification program provides evidence that your FS&Q Controls have worked;
- Food Compliance Culture programs must be verified to meet relevant Regulatory, Industry, and Customer standards and requirements;
- The verification of Food Compliance Culture must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Nominated verification records for Food Compliance Culture must be maintained as per relevant documented Policies, Procedures, and Work Instructions;
- A properly verified Food Compliance Culture program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly verified Food Compliance Culture program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Validation

To confirm the documented monitoring or procedural limits.

Validation

Validation: The process of gathering evidence to provide a scientific basis for the documented act of demonstrating that a procedure, process, and activity will consistently lead to the expected results. It often includes the qualification of systems and equipment.

Validation is the provision of evidence to support the limits of control or acceptability for food safety or quality parameters nominated within systemic elements. Limits of control or acceptability are commonly included within documented food safety and quality systems elements such as procedures, Food Compliance Culture plans, and specifications.

Common sources of validation include regulatory and legislative standards, finished product specifications and

customer requirements, industry codes of practice and guidelines, verified and validated research, historical product, and process control outcomes, and analytical testing.

The general goal of an established validation process is to ensure any systemic non-conformance issues are identified and rectified within an appropriate time frame. When non-conformance issues are identified through the validation process, Corrective Actions and Preventative Actions should be implemented to ensure they do not impact the effectiveness of the food safety and quality system.

Validation activities are commonly defined within the verification schedules and procedures of established food safety and quality management systems.

The following examples may apply to validation of the limits of control or acceptability for Food Compliance Culture:

- Confirmation of nominated Key Performance Indicators for Food Compliance Culture;
- Confirmation that the audit, inspection and complaint criteria used to judge Food Compliance Culture reflect regulatory and customer requirements;
- Comparison of Food Compliance Culture targets with current industry guidance;
- Review of whether survey and observation tools measure what they are intended to measure.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Compliance Culture Validation requirements in relation to their items.

Food Compliance Culture Validation Key Points

- Your validation program provides evidence that your FS&Q Controls will work;
- Food Compliance Culture programs must be validated to meet relevant Regulatory, Industry, and Customer standards and requirements;
- The validation of Food Compliance Culture must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Nominated validation records and supporting documentation for Food Compliance Culture must be maintained as per relevant documented Policies, Procedures, and Work Instructions;
- A properly validated Food Compliance Culture program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly validated Food Compliance Culture program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Training, Competency and Resources

Skills, knowledge and competency requirements to facilitate development, documentation, implementation, monitoring, corrective action, verification and validation of every Food Safety and Quality System Element.

Skills and Knowledge

Skills and Knowledge: Skills and knowledge are attributes of human interactions commonly linked to competency within any specified job-related task.

Training and competency requirements for Food Compliance Culture must be ongoing, including regularly scheduled reviews to ensure the effectiveness of training and competency outcomes.

Team members who have defined responsibilities regarding Food Compliance Culture should have knowledge including:

- Basic Food Compliance Culture requirements;
- Positive outcomes of Food Compliance Culture;
- Negative outcomes of a lack of Food Compliance Culture;
- Current Food Compliance Culture procedures, methods, and techniques;
- General operational, corporate, and social awareness regarding Food Compliance Culture;
- Regulatory, industry, and customer requirements regarding Food Compliance Culture.

Team members who have defined responsibilities regarding Food Compliance Culture should have skills including:

- Competency regarding basic Food Compliance Culture;
- Effective application of current Food Compliance Culture procedures, methods, and techniques;
- The basic development, documentation, and implementation of Food Compliance Culture and Prerequisite Programs within the food industry sector.

Team members who have defined responsibilities regarding Food Compliance Culture should have access to resources including:

- Food Compliance Culture training;
- Food Compliance Culture associations and events;
- Regulatory standards, industry and customer information, and updates regarding Food Compliance Culture;
- Incidents within the food industry sector regarding Food Compliance Culture;
- Commitment to Food Compliance Culture by senior management;
- Suitably qualified food industry professionals with verified experience in Food Compliance Culture;
- Effective communication systems including email, internet, and phone through which Food Compliance Culture information can be sent and received within suitable timeframes.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Food Compliance Culture Training, Competency, and Resources requirements in relation to their items.

You may wish to visit the Training, Competency, and Resources section of haccp.com for examples of best practice applications for this food safety and quality system element.

Food Compliance Culture Training, Skills, and Knowledge Key Points

- Your Training, Skills, and Knowledge program ensures all participating personnel, visitors, and contracted have the required skills and knowledge to effectively facilitate the requirements of your FS&Q Program;
- Training, Skills, and Knowledge programs for Food Compliance Culture must be facilitated to meet relevant Regulatory, Industry, and Customer standards and requirements;
- Training, Skills, and Knowledge programs for Food Compliance Culture must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Training, Skills, and Knowledge records for Food Compliance Culture must be maintained as per relevant documented Policies, Procedures, and Work Instructions;
- Properly applied Training, Skills, and Knowledge programs for Food Compliance Culture will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- Poorly applied Training, Skills, and Knowledge programs for Food Compliance Culture will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.



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