

FOOD SAFETY CULTURE

Implementing GFSI Standards

Introduction

The most recent Global Food Safety Initiative standard, GFSI Version 2020, includes mandatory implementation of a food safety culture program. Food safety culture goes beyond science and policy, and it emphasizes awareness and behavior among employees. Leadership and demonstrated social behavior are two major points of creating a culture.

Subsequently, GFSI benchmarked systems (SQF, BRC, etc.) are updating the new editions to include expanded requirements. Establishing culture is a new concept for many small food processing businesses, and this Tech Talk will give examples from which to base food safety culture programs.

Basic components to address in the program are expectations, training, communication, goals, measurement, management review, and corrective action.

Keep in mind the continuous improvement cycle: Plan, Do, Check, Act.

How will expectations be communicated?

- The company's policy statement needs to reference support for establishing a food safety culture, and include the company's definition of food safety culture.
- Management defines the expected behavior and can create a slogan to deliver the message to employees and custom-
- The slogan can be presented by management and repeated at regular daily or weekly meetings. Examples: "Food Safety Begins with Me" or "Food Safety is a Team Effort."
- Management needs to be an example of leadership in the food safety culture.
- A poster with illustrations or the slogan can be displayed prominently as a visual reminder.
- Expectations should include all employees and management will follow food safety procedures, report food safety incidents and exhibit food safety behaviors at all times.

- Compliance with expectations will prevent contamination of food that can lead to consumer illness, injury or fatality.
- The expected food safe behaviors prevent damage to the brand and reputation and are an investment in the future success of the company.
- If there is a history of a recall or other food safety event within the company, lessons learned should be included in the expectations, training and communications.

What will training material cover?

- Food safety training should begin on the first day of employment and be repeated each year at a minimum. Quarterly training would help keep everyone up to date and help verify employees who are absent for the annual training stay current.
- Training should include food safety is everyone's responsibility, the requirement for employees to report food safety issues, as well as specifically to whom to report the issue.
- Training material should include the behavior expectations, tools available for reporting issues and results of past measurements. In addition, continuous improvement efforts identified from the measurements/suggestions can be outlined with the resulting corrective actions.
- Training should be in depth enough to convince employees to care about the end goal and explain why food safety is valued.
- Empower employees with the knowledge and resources to be confident in the company's culture. Include them specifically in the program development process and corrective action plans.
- In person is preferred, but it is not required. Written or virtual methods can be developed.
- Management may decide to include discipline for deviations.

Training about culture goes above and beyond the food safety plan training to explain basic good manufacturing practices (GMPs), critical food safety control points, who is responsible and steps to follow in case of failure in the system to correct the problem.

How will food safety culture be communicated?

- Conduct daily or weekly meetings to ask for experiences and best practices that can be shared between employees.
- Communicate food safety program updates in regular management meetings.





- Ask employees with positive encouragement to make suggestions and/or report incidents using an anonymous suggestion box/toll-free hotline/email system.
- Topics can be presented in the meetings about different food safety related news or detailed information beyond the material covered in basic training.
- Different postings can be made that are changed and updated regularly.
- Statistics and real-world examples about food safety issues in your industry are good ideas for communication.

How will goals be developed?

- Defined goals create accountability and can change from year to year.
- · Goals need to be measurable.
- Achievable goals will reflect the efforts invested in training and communications.
- For example, decrease 10% year over year in customer complaints/issues reported/hotline calls, increase 10% year over year in exam average score or survey results improved by a defined percentage.
- A certain score on the food safety audit or internal audit is another idea.

How will food safety culture be measured?

- First, establish the current baseline of where employees and management are in their understanding of food safety culture.
- Measurement should be conducted annually at a minimum.
 Measurement also can be conducted immediately after corrective actions to show effectiveness or gather feedback.
- Exam questions can be written to cover company defined behavior expectations, slogan, reporting procedure, responsibilities and other information presented in the training regarding food safety culture. The exams will be scored, and management defines an acceptable average score.
- An anonymous survey of employees' feelings can be written with a rating scale for measurement (strongly disagree = 0, disagree = 1 ... strongly agree = 5). Statements should be consistently positive. "I feel comfortable reporting food safety issues to my supervisor" versus "I don't feel comfortable reporting food safety issues to my supervisor." The questions should cover attitudes of the company, peers, management, confidence, training and proactivity. Consider having an open comment section on the survey. The survey results can be summarized for management review.
- An anonymous survey can ask employees to rank company values. Example: List 10 values (honesty, production, shipping, food safety, etc.) and ask employees to pick the top five

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- most important, list in order from most important to least important or give each value a score from 1 to 10.
- Document interview responses. Example questions: What does your company value? What do you do when you see an issue at the Critical Control Point (CCP)?
- Document direct observations of employee behaviors in relation to food safety expectations.
- The food safety culture habits can be added to annual employee evaluations, especially those who have responsibility for food safety.
- Software can be purchased, or third-party companies will provide the service for a fee.
- The number of suggestions/reports/complaints received in an anonymous suggestion box, hotline or email can be tabulated, and the results can be categorized.
- Each of the areas mentioned above could be given a rating, and a report card type score can be assigned.
- The company may create their own way of measuring food safety culture as well.
- Be careful not to create a scenario that would potentially reward employees for not reporting issues or being dishonest on surveys.

How will the culture be improved?

- The results need to be reviewed by senior management annually at a minimum. The results can be presented either for senior management to initiate plans for continuous improvement or as completed corrective action plans.
- Corrective actions can be implemented to improve training material, hold more frequent meetings, display different posters, reduce the size meetings, increase exam/survey details, install more suggestion boxes or change the location of the suggestion box.
- The corrective action also can focus on one specific area that was identified as having a specific need for improvement.
- Specific suggestions, reports or complaints will drive specific corrective actions to achieve the goal of preventing future deviations. Record improvement from year to year.
- Be specific by saying, "We reduced complaints of a specific problem by 50% from 2019 to 2020," rather than "We haven't had as many complaints this year as we had last year."



References

What is Food Safety Culture? - MyGFSI SQF Code Edition 9 Webinars - SQFI

