FSSC 22000

FOOD SAFETY SYSTEM CERTIFICATION 22000

GUIDANCE DOCUMENT: FOOD SAFETY CULTURE

Version 5.1 | November 2020

INTRODUCTION

The GFSI TWG defines food safety culture as, "shared values, beliefs and norms that affect mind-set and behaviour toward food safety in, across and throughout an organisation."

The definition is derived from existing literature on organisational and food safety culture and made practical and applicable through the group's work.

A mature food safety culture is one in which the company vision and mission have been broken down into the finer details of expectations for every department and person throughout the organisation.

GFSI REQUIREMENT

The GFSI benchmarking document contains the following requirement that shall be implemented by GFSI approved Certification Program Owners (CPO) and audited onsite.

Requirement: Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of:

- Communication,
- Training,
- Feedback from employees and
- Performance measurement on food safety related activities.

GFSI GUIDING QUESTIONS

GFSI has drafted a set of guiding questions that could be used when auditing an organization against a GFSI approved certification scheme.

FSSC 22000 GUIDANCE

This FSSC 22000 guidance document shows how the GFSI guiding questions link to ISO 22000:2018 and FSSC 22000 additional requirements. It also gives additional guidance to FSSC 22000 qualified auditors on how to include food safety culture in the assessment.

These guiding questions help the auditor to additionally assess elements of food safety culture with regard to communication, training, feedback from employees and performance measurement on food safety related activities.

These aspects are covered by ISO 22000:2018 but with this guidance food safety culture is specifically addressed. Refer to Annex 1.

ANNEX 1

COMMUNICATION		
GFSI GUIDING QUESTION	**ISO 22000:2018**	**GUIDANCE**
How do your senior leaders engage with food safety?	**Clause 5.1, d)** Top management shall demonstrate leadership and commitment with respect to the FSMS by communicating the importance of effective food safety management and conforming to the FSMS requirements, applicable statutory and regulatory requirements, and mutually agreed customer requirements related to food safety.	Assessment of this ISO 22000 clause shall also include the expectations for every department and person throughout the organisation with regard to food safety culture
How is your messaging used to communicate food safety expectations to all employees?	**Clause 5.2.2, a) and b)** The food safety policy shall be: a) be available and maintained as documented information; b) be communicated, understood and applied at all levels within the organization;	Assessment of this ISO 22000 clause shall also include detailed assessment how food safety culture aspects are communicated throughout the organization.
Is your company's vision and mission clearly expressed so that both are understood by all staff?	**Clause 5.2.2, b)** The food safety policy shall be communicated, understood and applied at all levels within the organization;	Assessment of this ISO 22000 clause shall also include how top management has verified that food safety culture expectations are understood by all staff.
Are you confident that all employees know their responsibilities and are held accountable for their food-safety-related tasks, and that accountabilities are well-connected?	**Clause 5.3.1** Top management shall ensure that the responsibilities and authorities for relevant roles are assigned, communicated and understood within the organization. **Clause 7.4.3** The organization shall establish, implement and maintain an effective system for communicating issues having an impact on food safety. To maintain the effectiveness of the FSMS, the organization shall ensure that the food safety team is informed in a timely manner of changes in the following: a) – m)	Assessment shall be included in the interview of personnel at the shop floor. Look for evidence which feedback personnel receives on production performance and food safety issues.
Can you articulate your company's food safety expectations and how they are applied to every decision?	**Clause 4.2** To ensure that the organization has the ability to consistently provide products and services that meet applicable statutory, regulatory and customer requirements with regard to food safety, the organization shall determine: a) the interested parties that are relevant to the FSMS; b) the relevant requirements of the interested parties of the FSMS. The organization shall identify, review and update information related to the interested parties and their requirements.	This shall be addressed when interviewing top management. Also check when interviewing personnel at the shop floor to assess to which level personnel is informed on food safety expectations.

COMMUNICATION		
GFSI GUIDING QUESTION	**ISO 22000:2018**	**GUIDANCE**
	Clause 6.2 The organization shall establish objectives for the FSMS at relevant functions and levels.	
Does your strategy enable you to respond quickly and effectively, with appropriate oversight to ensure the right decisions are made?	**Clause 4.1** The organization shall determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended result(s) of its FSMS. The organization shall identify, review and update information related to these external and internal issues. **Clause 6.3** When the organization determines the need for changes to the FSMS, including personnel changes, the changes shall be carried out and communicated in a planned manner. The organization shall consider: a) the purpose of the changes and their potential consequences; b) the continued integrity of the FSMS; c) the availability of resources to effectively implement the changes; d) the allocation or re-allocation of responsibilities and authorities. **Clause 9.3** Top management shall review the organization's FSMS, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness.	This is determined by top management decision making process and should be addressed during interview of top management. Specifically look at the capability of top management to react on e.g. customer complaints or supplier issues.
Can you identify examples of where using industry intelligence has helped identify potential hazards or risks to your business?	**Clause 4.1** The organization shall determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended result(s) of its FSMS. The organization shall identify, review and update information related to these external and internal issues.	Specifically address NOTE 2 to this clause when interviewing top management. Industry intelligence is also part of understanding the context

TRAINING		
GFSI GUIDING QUESTION	**ISO 22000:2018**	**GUIDANCE**
When was your last food safety training and what did you learn?	**Clause 7.2, b)** The organization shall ensure that these persons, including the food safety team and those responsible for the operation of the hazard control plan, are competent on the basis of appropriate education, training and/or experience.	Assess the overall training program of the organization. Assessment shall also be included in the interview of personnel at the shop floor. Look for evidence that personnel have participated in food safety training.

TRAINING		
GFSI GUIDING QUESTION	**ISO 22000:2018**	**GUIDANCE**
How do you educate staff to understand why the hazard and risk management controls in their areas are so important, and what would be the consequences of not following them?	**Clause 7.3** The organization shall ensure that all relevant persons doing work under the organization's control shall be aware of their individual contribution to the effectiveness of the FSMS, including the benefits of improved food safety performance and the implications of not conforming with the FSMS requirements.	This should be addressed in the organization training program. Assess the content of the training program and training.

FEEDBACK FROM EMPLOYEES		
GFSI GUIDING QUESTION	**ISO 22000:2018**	**GUIDANCE**
When was the last time you or someone on your team raised a food safety concern?	**Clause 5.3.3** All persons shall have the responsibility to report problem(s) with regards to the FSMS to identified person(s).	Assessment shall be done when interviewing the food safety team (leader) and/or personnel at the shop floor. Look specifically for food safety concerns raised by personnel and how this has been managed by the food safety team and top management.
How do you contribute to food safety in your organisation?	**Clause 7.3, c)** The organization shall ensure that all relevant persons doing work under the organization's control shall be aware of their individual contribution to the effectiveness of the FSMS, including the benefits of improved food safety performance	Assessment shall be included in the interview of personnel at the shop floor. Look for evidence that personnel are actively involved in safeguarding food safety.
To what level are people committed and acting in accordance with food safety expectations?	**Clause 7.1.2** The organization shall ensure that persons necessary to operate and maintain an effective FSMS are competent (see 7.2).	Assessment shall be done by interview of personnel at the shop floor. Look for evidence that personnel are actively involved in safeguarding food safety.
Is your documentation designed to support employees' food safety decisions and behaviours?	**Clause 7.5.1, b)** The organization's FSMS shall include documented information determined by the organization as being necessary for the effectiveness of the FSMS;	Specifically address the NOTE to this clause when assessing. NOTE: The extent of documented information for a FSMS can differ from one organization to another due to: • the size of organization and its type of activities, processes, products and services; • the complexity of processes and their interactions; • the competence of persons.
Are employees engaged in the design and improvement of food safety-related protocols and instructions?	**Clause 5.3.2** The food safety team leader shall be responsible for: a) ensuring the FSMS is established, implemented, maintained and updated; b) managing and organizing the work of the food safety team; c) ensuring relevant training and competencies for the food safety team (see 7.2);	In principle personnel is represented by the food safety team. Look for evidence how the food safety team and top management involves personnel or personnel representative group when developing protocols and instructions. How are protocols and instructions validated at the shop floor.

FEEDBACK FROM EMPLOYEES		
GFSI GUIDING QUESTION	**ISO 22000:2018**	**GUIDANCE**
	d) reporting to top management on the effectiveness and suitability of the FSMS.	

PERFORMANCE MEASUREMENT ON FOOD SAFETY RELATED ACTIVITIES		
GFSI GUIDING QUESTION	**ISO 22000:2018**	**GUIDANCE**
How is your food safety performance measured?	**Clause 9.1.2** The organization shall analyse and evaluate appropriate data and information arising from monitoring and measurement, including the results of verification activities related to PRPs and the hazard control plan (see 8.8 and 8.5.4), the internal audits (see 9.2) and external audits. **Clause 9.3.2** Management review input.	Assessment shall be included in the interview of personnel at the shop floor. Look for evidence which feedback personnel receives on production performance and food safety issues. E.g. an overall company dashboard clearly showing the food safety performance. Also assess how top management evaluates food safety performance. E.g. a personnel survey that is executed periodically.
How does what you measure (e.g. customer complaints; compliance to procedures, productivity, etc.) influence your food safety culture? • Are your measurements related to volume/efficiency at the expense of food safety measures?	**Clause 9.1.2** The organization shall analyse and evaluate appropriate data and information arising from monitoring and measurement, including the results of verification activities related to PRPs and the hazard control plan (see 8.8 and 8.5.4), the internal audits (see 9.2) and external audits. **Clause 10.2** The organization shall continually improve the suitability, adequacy and effectiveness of the FSMS. Top management shall ensure that the organization continually improves the effectiveness of the FSMS through the use of communication (see 7.4), management review (see 9.3), internal audit (see 9.2), analysis of results of verification activities (see 8.8.2), validation of control measure(s) and combination(s) of control measure(s) (see 8.5.3), corrective actions (see 8.9.3) and FSMS updating (see 10.3).	Assess how complaints and nonconformance issues are managed by the organization and top management.

PERFORMANCE MEASUREMENT ON FOOD SAFETY RELATED ACTIVITIES

GFSI GUIDING QUESTION	ISO 22000:2018	GUIDANCE
How do you anticipate, manage and respond to change, learn from the past and prepare for the future?	**Clause 6.1.1** When planning for the FSMS, the organization shall consider the issues referred to in 4.1 and the requirements referred to in 4.2 and 4.3 and determine the risks and opportunities that need to be addressed to: a) give assurance that the FSMS can achieve its intended result(s); b) enhance desirable effects; c) prevent, or reduce, undesired effects; d) achieve continual improvement.	This is determined by top management decision making process and should be addressed during interview of top management. Specifically look at the capability of top management to react on e.g. customer complaints or supplier issues.
How do you review your "near-misses" and use this information to drive improvements in your food safety system?	**Clause 8.9.1** The organization shall ensure that data derived from the monitoring of OPRPs and at CCPs are evaluated by designated persons who are competent and have the authority to initiate corrections and corrective actions. **Clause 10.3** Top management shall ensure that the FSMS is continually updated. To achieve this, the food safety team shall evaluate the FSMS at planned intervals. The team shall consider whether it is necessary to review the hazard analysis (see 8.5.2), the established hazard control plan (see 8.5.4) and the established PRPs (see 8.2). The updating activities shall be based on: a) input from communication, external as well as internal (see 7.4); b) input from other information concerning the suitability, adequacy and effectiveness of the FSMS; c) output from the analysis of results of verification activities (see 9.1.2); d) output from management review (see 9.3). System updating activities shall be retained as documented information and reported as input to the management review (see 9.3).	Also included the management of near misses in the assessment of this clause.