

# 1 Keys to Success

## Success

How do we measure success in terms of the Global Standard for Food Safety? Essentially your first thought will be to get your certificate, as your passport to meeting your customers' requirements and being able to continue to supply them.

But in fact the Standard is a system which requires and encourages your continual application and attention throughout the year. As such the real success is not about that nice piece of paper in a frame in your reception area, it is about meeting the Standard for the 363 days in a year when you are not being audited, because the real success of this achievement is that you will have an excellent management tool for ensuring the safety and legality of your products.

The grading system for the Global Standard is discussed in the next chapter. Remember that the Global Standard is a demanding and exacting one. It is highly likely that even the best prepared site will receive some nonconformities because of a fresh pair of eyes looking at it and you should not be disheartened. Furthermore success does not mean only Grade A (or A\*). All the grades down to C are an achievement because it means that you have been able to correct all the nonconformities given.

Success is also about continual improvement; looking at yourselves and, through your review systems, finding ways to improve. A static system will inevitably start to stagnate and this will ultimately lead to you falling behind your competitors in terms of efficiency and customer satisfaction.

## Failure

Essentially failure is not achieving a certificate. There are only two ways to fail.

You fail if you get a D grade. This can only happen as a result of serious deficiencies such as if you fail to meet a Fundamental Requirement with a critical or major nonconformity or if you have a critical nonconformity against any clause. Other combinations of major nonconformities against other clauses also result in D. You can read the detail of this in Chapter 2, including help with the differences between critical, major and minor nonconformities.

Secondly if you fail to correct nonconformities in the required timescale you will not achieve a certificate. This would be the result of poor organisation or lack of resources or again, poor preparation.

## Preparation

This is one of the key words and the reason for reading this book.

The first thing that you must do is to obtain a copy of the Standard. It is available online at [www.brc.org.uk](http://www.brc.org.uk) or through the TSO at [www.tso.co.uk](http://www.tso.co.uk). It is available in various languages and in some cases in electronic format (as a .pdf file) as well as hard copy. This book should be read with the Standard at your side. In Chapter 2 we look at some of the main issues of the Protocol and in Part Two we look at each clause of the Standard in detail.

This book will help you to go through all the various stages to prepare you, but in essence you will need to have systems and procedures in place and ensure that you can readily demonstrate them to the Auditor. This will mean not only adhering to your systems but being able to show that you do so with documents and other hard evidence. It is easy to read the requirements and imagine that you can meet every one. But it is very rare for even a first class operation not to have some nonconformities. Often the reason for that is lack of preparation for the Audit.

### Example

A yogurt factory was hoping for a grade A certificate but they have been awarded a major nonconformity against Clause 3.6.1 because they could not show the Auditor a documented supplier approval procedure during the Audit. Later that night, the Technical Manager found a procedure on his computer at home and called the CB frantically next day to say he can now provide it, it was honestly there all the time and can the CB remove the nonconformity?

Unfortunately they cannot as it was not in place during the Audit and certainly not available for other staff to see. His major nonconformity remains and the site is later awarded a Grade B certificate.

## Documented Procedures and Records

While on this subject though it is worth pointing out that there are many clauses in the Standard that ask for a procedure or a work instruction. Not all of them specifically ask for a 'documented' procedure. The Auditor is likely to take the view though that by and large most if not all of your procedures should be documented. If you consider it from the Auditor's viewpoint, in order to be satisfied that you have a procedure in place it will generally have to be written down. However there are certain cases where the Standard specifically requires documents and the Auditor will have no choice but to give a nonconformity if it is not. It is folly not to have a written procedure or record when the Standard clearly asks for it.

I will be going through every clause in the Standard in Part Two but to underline this point now Table 1.1 shows which are the clauses of the Standard that require a specific documented procedure or records.

**Table 1.1** Clauses that specifically require documents.

Subject (number of clauses)	Clauses
Senior Management Commitment (3)	1.0, 1.3, 1.8
HACCP (6)	2.2.2, 2.6.3, 2.8.1, 2.8.3, 2.10.2, 2.13.1
Food Safety and Quality Policy (1)	3.1
Food Safety and Quality Manual (1)	3.2.1
Organisational Structure (3)	3.3.1, 3.3.2, 3.3.3
Contract Review & Customer Focus (2)	3.4.2, 3.4.3
Purchasing (1)	3.6.1
Specifications (1)	3.7.2
Corrective, Preventative Action (1)	3.8.1
Withdrawal, Recall (2)	3.11.2, 3.11.3
Equipment (1)	4.5.3
Maintenance (3)	4.6, 4.6.4, 4.6.7
Foreign Body Control (1)	4.8.3.1
Glass and so forth (1)	4.8.4.2
Housekeeping & Hygiene (3)	4.9.1, 4.9.3, 4.9.5
Pest Control (2)	4.11.2, 4.11.7
Storage and Transport (3)	4.12.3, 4.12.5, 4.12.8, 4.12.9
Product Development (2)	5.1.3, 5.1.8
Allergens (3)	5.2.1.2, 5.2.1.3, 5.2.1.5, 5.2.1.6
Identity Preserved (1)	5.2.2.2
Foreign Body Detection (2)	5.3.1, 5.3.3
Product Packaging (1)	5.4.1
Product Inspection (1)	5.5.1.1
Laboratory Testing (3)	5.5.2.2, 5.5.2.3, 5.5.2.4
Non-Conforming Product (1)	5.6.2
Control of Operations (1)	6.1.3
Calibration (2)	6.3.1, 6.3.2
Training (2)	7.1.2, 7.1.3
Personal Hygiene (3)	7.3, 7.3.1, 7.3.2
Clothing (1)	7.5.1

Read each clause carefully and make sure that you have the document available for the Audit.

## Evidence

Here is another key word, especially for the Auditor. The Auditor is looking for evidence to support that fact that you meet a requirement. The Auditor has to report all the evidence that they find in order to support the fact that you meet the requirement. Your preparation should include making sure that you have that evidence, whether it is a physical, tangible thing that the Auditor can see or whether it is a document or record. You must also have the evidence readily available.

It may be that the Auditor wants to test the retrieval of your records. For example you might say in your Quality Manual that you maintain records for 3 years so be

prepared for the Auditor to ask for a 3-year-old record. Failure to be able to do this might result in a nonconformity under 3.7.3.1 (more on this in Part Two).

As far as documentary evidence is concerned much of this is now seen in the form of computer records as well as paper records. While there is nothing that pleases some Auditors more than good paper records with 'real' signatures, it is understandable that many manufacturers want to keep electronic records. In this case the Auditor will be looking for some assurances of authorisation of these records and probably systems for limiting access to certain personnel, password protection, backing up, Audit trail and so on.

Part Two will deal with examples of the kind of evidence you will need for each section of the Standard.

## Track Record

In the Introduction I indicated that 12 weeks was on the tight side in terms of preparing for the Audit from scratch. If you already have reliable systems in place and have been keeping good records then yes it would be possible; however the key phrase here is track record. The Auditor must have confidence that what they see is representative of your continuous controls and not a nine day wonder to get you through the Audit. That means for example that they will want to see records going back some months as the bare minimum.

For a completely new site I would say it is not possible to audit without at least 3 months track record, and preferably more. The BRC have issued a position statement to this effect (see Consistency and Position Statements in Chapter 3).

## Team Building

When you are establishing a HACCP system you are encouraged to have a team involved, preferably from several disciplines within the factory. If you are a Quality Manager or Technical Manager a team approach to the whole Global Standard is a good one, not only to share the burden and spread the load but to ensure that systems are better maintained. You will be expected to have other members of management involved in the Quality System and take part in system reviews, internal auditing and so on so it is a good idea to make your ongoing systems a team effort.

In a small company your team may only consist of two people but even so this will pay dividends. For the Auditor who arrives to find that only one person on site knows anything about the Standard alarm bells will ring from the start.

A consultant may form a useful part of your team, especially where resources are limited and your staff number is small. By all means consider this option if you feel unsure about your prospects for your Audit. A good consultant can make all the difference to the outcome for you, especially if you are lacking in resource in your preparation for your Audit. The expertise and experience they can bring to your team can be considerable. However choose them with care and make sure that they are team players. They may also play a significant part in the Audit itself and represent you well. On the other hand their very independence can sometimes cause problems as I discuss in Chapter 4.

## See Yourself as Others See You

Try to imagine what it is like for a complete outsider to understand your thoughts and philosophies, your policies and practices in a couple of days. You may have been in your situation for many years and have grown and evolved to a point where you have a well-run operation. But guard against complacency and take nothing for granted. Spend some time considering how you can best present yourselves to someone else, in what is only a snapshot of what you do.

To use the example of documented procedures again, the very worst thing to say to an Auditor who asks to see a documented procedure is to admit 'well actually we don't have one because that is always done by so and so, and they have been doing the same job for absolutely years'. There are many arguments against this approach such as 'how would you train new staff in procedures if they are not documented?' or (my personal favourite) 'so if the production manager drops dead tomorrow does anyone else actually know what to do?'

Sometimes you have to take a mental step outside your day-to-day environment to see how you could justify your approach to an outsider.