How to Document a Food Safety System and Details on Approved Supplier Programs

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Excellence in Food Safety Management
Documentation - What is the Goal?

• Develop a documented Food Safety and Quality Manual utilizing pragmatic verbiage to define integrated management systems and articulate company methodology to meet objectives.

Or

• Write what you do to describe how you meet requirements.
What is Required?

- A food safety ‘manual’ - documented (electronic or hard copy) made available and include:
  - Policy statement and org chart
  - Scope and list of products
  - Include or reference what supports development implementation and control of the system.
Outline the methods to meet the requirements of the Standard and include:

– A summary of food safety policies and the methods used to meet the requirements of the Standard

– Include or reference ... food safety plans or other documentation
The Documentation System

- Policy Manual
- Food Safety Plan
- Procedures
  Work Inst.
  SOP’s
- Records

KEEP IT SIMPLE!
Structure is Essential

• Choose a format with a header and footer
• Use this as often as possible.
• Policy, Procedure, Work Instruction, Forms
• It is not necessary for all items
  – Specifications
  – HACCP Plan
  – Meeting Minutes
Choose a Format

• Header and footer options
  – Company Name or Logo and Document Title
  – Revision Date
  – Supersedes / Replaces / Previous
  – Document ID or Number
  – Authorized by or Author
  – Page X of Y
  – Confidentiality Statement
  – Department
Core Content Structure

• How many times does the code indicate ‘Responsibility and Methods shall be documented’?

• Set your self up for success

• Select options that add value and support the system.
Content Options

• Options:
  – Scope / Background / Purpose / Introduction / Objective
  – Glossary
  – Regulatory References
  – Responsibility
  – Equipment
  – Frequency
Content Options

• Options:
  – Method / Procedure / Steps / Instructions
  – Records
  – Verification / Validation
  – Monitoring
  – Corrective (and Preventive) Action
  – Change History
1. **Objective**
   – This operating procedure ...

2. **Glossary**
   – Terms you may not understand include ....

3. **Equipment**
   – Items needed to complete these tasks....

4. **Regulatory / Customer Highlights**
   – Be aware that this is impacted by or based on ....

5. **Responsibility**
   – Coaches and managers are responsible for ..
6. Procedures
   – First step....
   – Second step or policy

7. Corrective and Preventive Action
   – If this procedure is not followed correctly....
     • Fix the problem
     • Find a cause for the defect or error
     • Work to prevent that cause

8. Records
   – Evidence of completion includes...

9. Change History
   – Evidence of completion includes...

Trade Secret / Confidential Commercial Information.
This document is exempt from disclosure per 5 U.S.C. par. 552(b)(4)
Words to Use Cautiously

Any     Shall     All

Each     Every     Hourly

Periodically

Randomly

Daily

Continually

Should

Names
Defining Words

• Define but limit ‘local’ language

• Don’t use the word you are defining within the definition

• Define all acronyms the first time they are used.
Unnecessary Words

More words or syllables is not always better

- Utilize or utilization = use
- In the event of = If or for
- Methodology = method
- At this time = currently
- Don’t restate the code
- Don’t write a performance standard
Questionable to Confident

- We will strive to.. / We will
- We believe / We maintain
- We feel / We understand
- The employee will attempt / The employee will
- Should / Shall
- Work in progress / Scheduled event
The Function of Forms

• Lead the user to complete documentation
• Avoid repetitive documentation

• Ensure inclusion of
  – units
  – authorization / verification
• Declare limits
• Provide training
Control What Has Been Created

• What Should Be Controlled?
• Documents that could cause an error if the wrong version was used
• Any form essential to the system.
• All portions of the HACCP Plan.
Approved Suppliers
Approved Suppliers

Like a tapestry, finished goods require many quality interwoven components.
Approved Suppliers

• What should be included:
  – Raw Materials
  – Ingredients
  – Packaging
  – Services
  – Selection, Evaluation, Approval, Monitoring

A good program will avoid:
“RIPS in the SEAM” of the tapestry
Based on Risk

- Basing the program on risk adds value.
- There is very little prescriptive detail in codes.
- Start with what you know and what you do now. Do you treat the supplier of pens with less scrutiny than one who provides a key ingredient?
- Define very low risk and assign very minimal controls to those suppliers.
Selection

• Start with the list of current suppliers. Pre-approve based on history.

• Review that history. How did they become trusted suppliers? This creates the roadmap for new suppliers, based on risk.

• Don’t create a program that states ‘all’ suppliers will provide... (a letter of guarantee or certificate of analysis). Base selection on risk.
Categories Save Time

- Consider classifying items into groups
  - all cleaning chemicals – low risk
  - all contact but non-ingredients - medium

- Consider expanding
  - numerical risk rating system
  - FMEA
Evaluation of Suppliers

- Consider using a probation period.
- Only request and collect data you will use.
- Use data compared to a pre-established benchmark or standard to make and document decisions.
- Discipline is much easier with pre-defined rules.
Approval

- Indicate rules for approved and denial or removal
- Ensure commitment
- If you find purchasing trying all too often to bend the rules one of two things is likely true
  - the rules are not truly based on risk
  - or the risk is not truly understood.
- Don’t ‘do’ GFSI Schemes only for the sake of a certificate or to follow someone’s advice. Follow the Code, document and defend your decisions based on risk.
Monitoring

• Ensure the goals are established before measurements are taken.
  • Measure what you need to know to make a safe quality product and run an efficient company.
  • Use supplier data to support the HACCP Plan.
  • Do not spend resources without getting a return on the investment or reducing risk.
• Keep it simple!
Monitor What?

- Monitor supplier ability to meet specifications. Consider...
  - Product condition, temperature, shelf life, cargo security
  - Vehicle condition
  - Foreign object or chemical contamination
  - Allergens, labels and legality
  - Does the COA have meaning and value?
  - Don’t wait until the delivery arrives to determine rules
Respond to Results

- Do suppliers get rewarded, encouraged or warned of trends?

- Results of monitoring can be a source of demonstrating continuous improvement.
  - Decrease # of defects or incidents
  - Increase # or improve type of receiving inspections
  - Increase or improve data retrieval
“Emergencies”

• The receipt of materials can be from non-approved Suppliers in an emergency situation provided ....they are inspected or analyzed before use.
Beyond the Minimum

• Approved Customers?
  – Your customer supplies a service to transport, further process, prepare, serve, store, distribute or sell your product at retail.

  – If it is not done well, this will impact trust in your product, your brand and your company.
Further Apply the Concept

• Don’t forget your internal customers and suppliers.

• Consider expanding the program to include ‘internal’ suppliers from one department to another.
  • Define expectations
  • Monitor progress where it adds or can add value
  • Document this as part of continuous improvement
Document Carefully...
Favorites

• The company will ensure properly installed ducks

• There was condensation on the duck work

• Records will be helped for a minimum of two years
Favorites

• The Pest and Rodent Representative shall conduct inspections...

• A binder that contains more information is provided in the service provider
Favorites

• After blending, add salt and people as needed.

• To ensure safety, hair must be retrained

• Product is for cooking and consumption by the general public and for banking.
Favorites

• The Food Dense Plan is attached.

• All visitors were a hair net

• The Floor person exposed of it.

• On the east side of the building, there was a whole in the fence.
Favorites

• Temperatures must be taken every 15 minutes in (F)

• Staff indicted the Practitioner as responsible
Keep it Simple
Keep it Safe
and Remember
The Power of Food

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