

# BRCGS Food Safety

## F837: Position Statements

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### Document Scope

Where clarification of interpretation of a requirement of the Global Standard for Food Safety or its protocol is necessary this will be published on the BRCGS website ([www.brcgs.com](http://www.brcgs.com)) as a position statement. Such statements are mandatory in their use from the date specified for implementation or the date of publication on the BRCGS website, where no date is specified.

### Change log

Version no.	Date	Description
1	29/5/19	First issue of a position statement on clause 1.1.2 and changing certification body for a re-audit.

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## Clause 1.1.2

The following position statement has been agreed to ensure expectations relating to compliance with clause 1.1.2; its consistent application at certificated sites, and assessment during audits are understood.

The clause is applicable to all sites certificated to Issue 8 of the Standard and shall be audited as part of all audits of the Standard.

In summary, the clause requires sites to:

Define and maintain a clear plan for the development and continuing improvement of food safety culture. This plan must include:

- Clearly defined activities that will be completed
- Involve all sections of the site that have an impact of product safety (whilst specific activities may be relevant to certain departments or roles, overall the plan must ensure that all relevant section/roles are covered)
- An action plan indicating how the identified activities will be undertaken/completed
- Measurement of the activities (i.e. where they completed, where the correct people involved, were activities successful, any other learnings)
- Intended timescales for the completion of the activities
- A review of the effectiveness of completed activities

Where sites are non-compliant, the non-conformities shall be graded as follows:

### Major Non-conformity

Where the site does not have a documented plan for food safety and quality culture. In this context a plan is more than a short statement of intent, but documentation incorporating the requirements of the clause (as summarised above).

### Minor Non-conformity

Where a documented plan exists, but is:

- of poor quality (e.g. insufficiently detailed, for example missing timescales for completion or absence of clear action plans)
- does not cover all the relevant areas or staff
- not fully implemented (e.g. some activities not implemented or not completed to predefined schedule).

### Site review of the effectiveness of completed activities

The third bullet point in the clause requires sites to undertake a review of the effectiveness of completed activities.

However, as audits to the Standard only commenced in February 2019 it is possible that this review of the success of the programme, would not always be implemented in year 1 and therefore non-compliance with this bullet point is not considered a non-conformity until the site's second audit to Issue 8.

**Corrective action required to enable certification**

Corrective action, root cause analysis and preventive action plans shall be developed in accordance with the section 2.3 of the audit protocol.

**Grading:** The non-conformance shall be included in the calculation of the site grade.

**Effective date:** 1<sup>st</sup> June 2019

## Changing Certification Body for a Re-audit

A re-audit in the context of this requirement is an audit carried out before the usual audit due date or the audit following a failure to be certificated. This most often occurs to improve the audit grade.

Sites have the ability to request a re-audit however this must be completed by the Certification Body who issued the current certificate.

In exceptional circumstances, a site may be permitted to change Certification Bodies for the re-audit when agreed in advance by BRCGS. Where a change in Certification Body has not been sanctioned, the re-audit will be null and void and will not be accepted onto the BRCGS Directory.

Justification shall be provided in writing to the Certification Body who shall submit it to BRCGS for consideration through the formal concession process.

**Effective date:** 1<sup>st</sup> June 2019