We have written this workbook to assist in the implementation of your BRC food safety management system. The workbook is divided into 8 steps that are designed to assist you in implementing your food safety management system effectively:

- ✓ Step One: Introduction to the BRC Global Standard for Food Safety Plus FSMA Management System
- ✓ Step Two: Gap Analysis
- ✓ Step Three: Senior Management Implementation
- ✓ Step Four: Food Safety Plan/HACCP Implementation
- ✓ Step Five: Food Safety Quality Management System
- ✓ Step Six: BRC Implementation & Training
- ✓ Step Seven: Internal Auditing Training & Checklists
- ✓ Step Eight: Final Steps to BRC Certification

The Workbook guides you through the process of implementing our BRC plus FSMA Food Safety Quality Management System, which is an ideal package for Food Manufacturers looking to meet British Retail Consortium Global for Food Safety 2018 (Issue 8) and the additional voluntary FSMA Preventive Controls Preparedness Module.

This comprehensive system contains:

- ✓ Comprehensive Procedures Manual
- ✓ FSMS Record Templates
- ✓ Voluntary Module 15 FSMA Preventive Controls Preparedness documentation
- ✓ FSMA Hazards Analysis & Preventive Controls Guidance & Tools
- ✓ HACCP Manual containing the HACCP Calculator
- ✓ Laboratory Quality Manual
- ✓ Training Modules and Exams
  - → BRC Standard for Food Safety Training Module
  - → HACCP Training
  - → Internal Audit Training and Checklists
- ✓ Verification and Validation Record Templates
- ✓ Free online support via e-mail

As well as being updated this BRC Implementation Package includes additional management tools to help you achieve BRC certification:

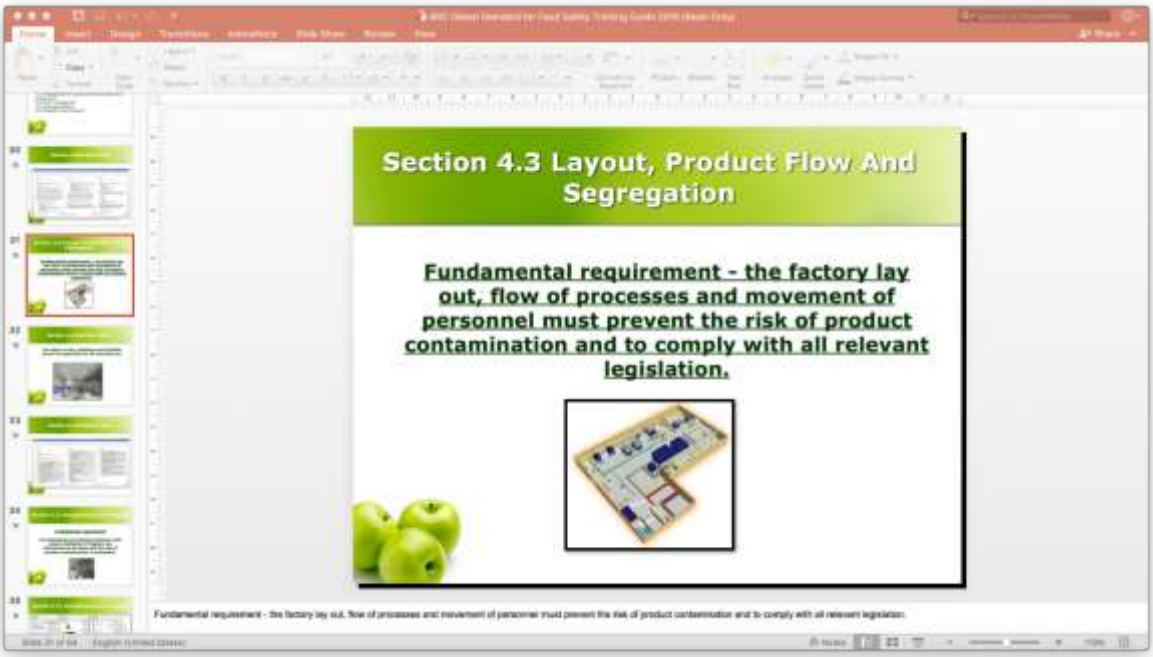
- ✓ Unannounced Audit Guidance
- ✓ Allergen Management Module & Risk Assessment Tool
- ✓ Supplier Risk Assessment Tool
- ✓ Product Development Module
- ✓ BRC Risk Assessment Tool
- ✓ Complaint Management Guidelines & Analyser
- ✓ Hygiene Inspection Training
- ✓ Verification Schedule Risk Assessment Tool and Template

As a preliminary to Step 1 we recommend that the you get a copy of the current issue of the BRC Global Standard for Food Safety. It is free to download at the BRCBookShop

Your next job is to get a copy of the current issue of the FSMA Preventive Controls Preparedness Module and Guidance For BRC-Certified Facilities. It is free to download at the BRC Global Standards website.

Step One: Introduction to the BRC Global Standard for Food Safety

This PowerPoint training module presentation will introduce the BRC Global Standard for Food Safety to the management team and explain how to start the process of implementing a BRC compliant Food Safety Management System.



Step Two: Gap Analysis

At this stage, an assessment should be made by the most senior technical member of the management team to decide if the Site Food Safety Management System in its current form meets the Requirements in Sections 1 to 9 of the BRC Standard. The nominated manager should read through the requirements in Section 1 to 9 of the BRC Global Standard for Food Safety and assess for compliance using the checklist below to record their findings.

BRC Global Standard for Food Safety F804a: Issue 8 Auditor Checklist and Site Self-Assessment Tool can be used for this task and can be downloaded here: https://brcglobalstandards.com/media/1055370/f804a-issue-8-checklist-english.docx

Findings can be summarised below.

BRC Global Standard for Food Safety Issue 8 Gap Analysis			
Relevant Documentation Requirements	**Compliant**		**Comments**
Section 1 Senior Management Commitment	**Yes**	**No**	
1.1 Senior management commitment and continual improvement			
1.2 Organisational structure, responsibilities and management authority			
Relevant Documentation Requirements	**Compliant**		**Comments**
Section 2 The Food Safety Plan – HACCP	**Yes**	**No**	

Step Three: Senior Management Implementation

A Senior Management Implementation checklist is provided that establishes your Food Safety Management System fundamentals including Food Safety Policies and Objectives.

The checklist guides Senior Management:

- ✓ in planning the establishment of the FSMS
- ✓ in providing adequate support to establish the FSMS
- ✓ in ensuring there is adequate infrastructure and work environment
- ✓ in allocating responsibility and authority

This stage requires the Senior Management to meet and establish the foundations for the Food Safety Management System:

- ✓ Formulating a checklist of Customer, Regulatory, Statutory and other relevant Food Safety requirements
- ✓ Decide which Food Safety requirements the company should address and develop relevant policies.
- ✓ Based on the Food Safety Policy Management Policies establish Food Safety Objectives
- ✓ Define the scope and boundaries of the FSMS
- ✓ Plan the establishment of the FSMS using the project planner
- ✓ Provide adequate support to establish the FSMS
- ✓ Ensure there is adequate infrastructure and work environment and develop a Corrective Action Plan to rectify Prerequisite shortfalls
- ✓ Allocate responsibility and authority
- ✓ Assess, plan and establish appropriate internal and external communication (including the food chain) channels

As a decision has already been made to implement a system compliant with the BRC Global Standard for Food Safety, the Senior Management meeting should also consider the requirements of the Standard which are summarised below and should be read direct from the Standard:

Section 1 Senior Management Commitment	
Fundamental requirement - S*enior management demonstrate they are fully committed to the implementation of the requirements of the Global Standard for Food Safety and to processes which facilitate continual improvement of food safety and quality management.*	
Relevant Documentation Requirements	
Section 1 Senior Management Commitment	
1.1	Senior Management Commitment and Continual Improvement
1.1.1	Documented Food Safety Policy
1.1.2	Food Safety & Quality Culture
1.1.3	Documented Food Safety Objectives
1.1.4	Senior Management Review
1.1.5	Meeting Program
1.1.6	Confidential Reporting System
1.1.7	Human and Financial Resources
1.1.8	Informed of All Relevant Legislative, Scientific
1.1.9	Current, Original Copy of The Standard
1.2	Organisational Structure, Responsibilities and Management Authority
1.2.1	Organisation Chart
1.2.2	Employees are Aware of Responsibilities

A meeting should now be co-ordinated involving all the Senior Management Team.

Senior Management FSMS Implementation Meeting

Date

Time

Venue

Agenda

1. Formulating a checklist of Customer, Regulatory, Statutory and other relevant Food Safety requirements
2. Decide which Food Safety requirements the company should address and develop relevant policies.
3. Based on the Food Safety Policy Management Policies establish Food Safety Objectives
4. Define the scope and boundaries of the FSMS
5. Plan the establishment of the FSMS using the project planner
6. Provide adequate support to establish the FSMS
7. Ensure there is adequate infrastructure and work environment
8. Allocate responsibility and authority
9. Assess, plan and establish appropriate internal and external communication (including the food chain) channels

Attendees:

Senior Management Team		
Job Title	**Name**	**Role in Team**
Managing Director		Chairman
Site Director		Deputy Chair
Operations Manager		Operations Reporting
Technical Manager		Food Safety and Quality Reporting Management Representative
Planning Manager		Planning and Capacity Reporting
Distribution Manager		Distribution Reporting
Maintenance Manager		Services and Engineering Provision
Finance Manager		Financial Reporting
Human Resources Manager		Resource reporting

The outputs from this meeting will be:

- ✓ Food Safety Policy
- ✓ Food Safety Objectives
- ✓ Defined Scope
- ✓ A Developed Project Planner
- ✓ Support Plan for Implementation/Training
- ✓ Plans for Infrastructure/Work Environment/Prerequisites
- ✓ Allocation of Responsibility/Authority
- ✓ Defined Communication Channels

Senior Management can choose/adapt the templates supplied with the system to assist in documenting policies and objectives:

Senior Management provide adequate support to establish the FSMS

Senior management establish and provide adequate support to establish the FSMS including the resource required to complete the implementation plan, establish, implement and maintain the Food Safety Management System, conduct Internal Audits and Monitor & Measure.

Action (vi)	Senior management provide adequate support to establish the FSMS	
	Resource requirement	Details
	Food Safety Team Leader	
	Food Safety Team	
	FSMS Steering Group	
	Trainers	
	Internal Auditors	

Senior Management establish and provide Infrastructure and Work Environment Requirements

Senior Management provides the Infrastructure and Work Environment required to establish the Food Safety Management System. Having assessed the resources required to implement, maintain, and improve the Food Safety Management System, these resources should be provided including:

- Requirements identified in Step 2
- Skilled Personnel
- Suitable materials
- Suitable equipment
- Appropriate Hardware and Software
- Infrastructure
- Information
- Finances
- Audit resource
- Training resource

Action (vii)	Senior management ensure there is adequate infrastructure, work environment & compliance with prerequisite requirements	
	Infrastructure/Work environment/Step 2 requirements	Details

Step 2: Confirmed Corrective Actions from Gap Analysis							
Date	**BRC Standard Section**	**Details of Non Conformance**	**Identified by:**	**Corrective Action Required**	**Responsibility**	**Target completion Date**	**Date Completed**

Senior Management Establish Food Safety Responsibility & Authority Levels

Process	Responsible Persons	Activity
Purchases	Purchasing Manager	Purchase ingredients from approved and certified sources Ensure purchase orders comply with applicable specifications
	Technical Manager	Ensure adequate information on supply application form Ensure suppliers adhere to supply handling practices Perform suppliers audit or review supply status where necessary
Receiving and warehousing	QA/QC & Store Executives	Compare PO and DO or check contracts as per Suppliers Specifications criteria (if applicable) Check receiving temperature, pest infestations, quality, packing conditions and truck hygiene. Observe unloading practices Handle incoming goods as per documented procedures Ensure Good Storage Practices and FIFO rotation principles
Preparation of Ingredients	QA/QC, Production Manager & Production Executive	Follow safe food preparation and handling practices Check environmental hygiene and safety Check equipment process performance and maintenance Check water quality and safety Check raw materials identification and traceability
Production	QC/QC, Production Manager, Supervisor & Operators	Maintain product recipes and characteristics Do not modify recipes prior to approval from top management Follow safe food handling practices Ensure Good Manufacturing Practices are adhered to Follow cleaning and sanitation standards and procedures Follow the handling standards of raw and processed foods
Holding and Filling of Processed Food	Production Supervisor & Operators	Follow safe food holding procedures Hold foods outside the range of danger zone Follow safe food filling procedures into primary packaging
Capping, coding and packing	Production Supervisor & Operators	Follow safe capping procedures Ensure food in primary packaging are hygienically located Ensure coding for traceability is performed to procedures Follow secondary packaging procedures to protect products

Senior Management Establish Food Safety Responsibility & Authority Levels

Process	Responsible Persons	Activity

HACCP Implementation Guide Section 2.1 Food Safety Team

A core multidisciplinary team should be utilised within the company to develop the Food Safety Management System. This core team should be supplemented by other staff when specific areas or products are being analysed. The team need to have knowledge and experience of HACCP, Products, the Process, the Equipment, and Hazards and in developing and implementing a food safety management system. The HACCP team leader needs to be able to demonstrate competence in the understanding of HACCP principles and their application. Key personnel identified as HACCP team members should be HACCP trained and have appropriate experience, all of which should be documented on the HACCP teams training records. Expert external assistance may be used as an aid.

A typical HACCP Team may include:

Team Member	HACCP Training
Technical Manager	Advanced
Laboratory Manager	Intermediate
Processing Manager	Intermediate
Engineering Manager	Intermediate
Production Manager	Intermediate

Food Safety Team			
Food Safety Team	**Name**	**Position**	**Qualification**

- Prescribed storage temperature
- Prescribed storage conditions
- Intended use and reasonably expected handling
- Packaging
- Target consumers
- Possible unintended mishandling or misuse of the product
- Where the product is stored
- How the product is sold
- Labelling Instructions for handling, preparation and usage
- Prescribed delivery conditions

Product Description

Product Description Questions	Details
What is the product name?	
What will the purchaser do with it?	
Details of the packaging?	
How is the product processed or manufactured?	
What is the composition of the product?	
Is there preservation from chemical composition such as pH or Aw?	
Does the product receive microcidal treatment such as heating, freezing, brining or smoking?	
What is the Shelf life?	
What is the prescribed storage temperature?	
What are the prescribed storage conditions?	
Who are the target consumers?	
Where is the product stored?	
How is the product sold?	
Labelling Instructions?	
Prescribed delivery conditions?	

HACCP Implementation Guide Section 2.7

The food safety team perform a food safety hazard analysis
The food safety team identify and document food safety hazards

List All Potential Hazards associated with each step:

The HACCP (food safety) team consider hazards present in raw materials, those introduced during the process or surviving the process steps, and following types of hazard:

- Allergen risks (e.g. peanuts, egg, gluten, milk etc.)
- Biological including Microbiological (e.g. Biological – parasites, Microbiological – E.coli O157 etc.)
- Physical contamination (e.g. glass, metal, wood, plastic, packaging offcuts, fruit stones etc.)
- Chemical contamination (e.g. cleaning chemicals, lubricants, pesticides, migration chemicals etc.)
- Radiological contamination (e.g. Iodine-131, Cesium-134, Cesium-137 etc.)
- Fraud (substitution or intentional adulteration) (e.g. Melamine, meat species etc.)
- Malicious contamination of products

Identify and record all the potential hazards
Conduct a hazard analysis
Consider the control measures

The Food Safety Team should now conduct a hazard analysis for food safety hazards that are reasonably likely to occur for each product and process category.

The Food Safety Team should identify hazards taking into account the steps preceding and following the specified operation, process equipment, process service and surroundings and preceding and following links in the food chain.

The food safety team can also use our hazard analysis prompt to identify potential food safety hazards:

Food Safety Hazard Analysis Prompt	
1	Are the raw materials, ingredients or food contact packaging likely to have microbiological hazards present? (Refer to Hazards worksheet)
2	Are the raw materials, ingredients or food contact packaging likely to have chemical hazards present? (Refer to Hazards worksheet)
3	Are the raw materials, ingredients or food contact packaging likely to have physical hazards present? (Refer to Hazards worksheet)
4	Are there any characteristics in the composition of the food during which can prevent a hazard? E.g. Preservatives, pH, Water Activity
5	Does the food permit survival or multiplication of pathogens and at which stages?
6	Does the process include a controllable step that destroys pathogens or their toxins? (Consider spores)
7	Is it possible the product could be subject to recontamination?
8	Is product contamination (consider direct and indirect contamination) with hazardous microbiological organisms from equipment, process environment or personnel likely to occur?
9	Is product contamination (consider direct and indirect contamination) with hazardous chemical substances from equipment, process environment or personnel likely to occur?
10	Is product contamination (consider direct and indirect contamination) with hazardous physical objects from equipment, process environment or personnel likely to occur?
11	Will the food be heated by the consumer?
12	Is it likely that the food contains viable spore forming pathogens?
13	Is it likely that the food contains viable non spore forming pathogens?
14	What is the normal microbial content of the food stored under proper conditions?
15	Does the microbial population increase during the time the food is stored before consumption?
16	Does that increase in microbial population alter the safety of the food?
17	Does the layout of the facility provide an adequate separation of raw materials from ready-to-eat foods?
18	Will the equipment provide the time and temperature control that is necessary to meet critical limits?
19	Is the equipment reliable or is it prone to frequent breakdowns?

The food safety team specify acceptable levels for each hazard

For each Food Safety Hazard Identified, the acceptable level of the hazard in the end product is determined, justified and recorded taking into account regulatory requirements, customer food safety requirements, historic information, scientific literature, professional experience and intended use by the customer.

This hazard list is referred to as a preliminary hazard list and covers all hazards that could potentially occur in the product.

The hazards identified should be entered into the list of Hazards on the sheet in the HACCP manual:

Step Number	Step Name	Hazards Identified
1	Delivery of Ingredient A	Bone
1	Delivery of Ingredient A	Campylobacter spp.
1	Delivery of Ingredient A	Contamination with Bacteria from pests
1	Delivery of Ingredient A	Pesticides
1	Delivery of Ingredient A	Salmonella spp. (S. typhimurium, S. enteriditis)
1	Delivery of Ingredient A	Bacteria (spore-forming) General
1	Delivery of Ingredient A	Pest control chemicals

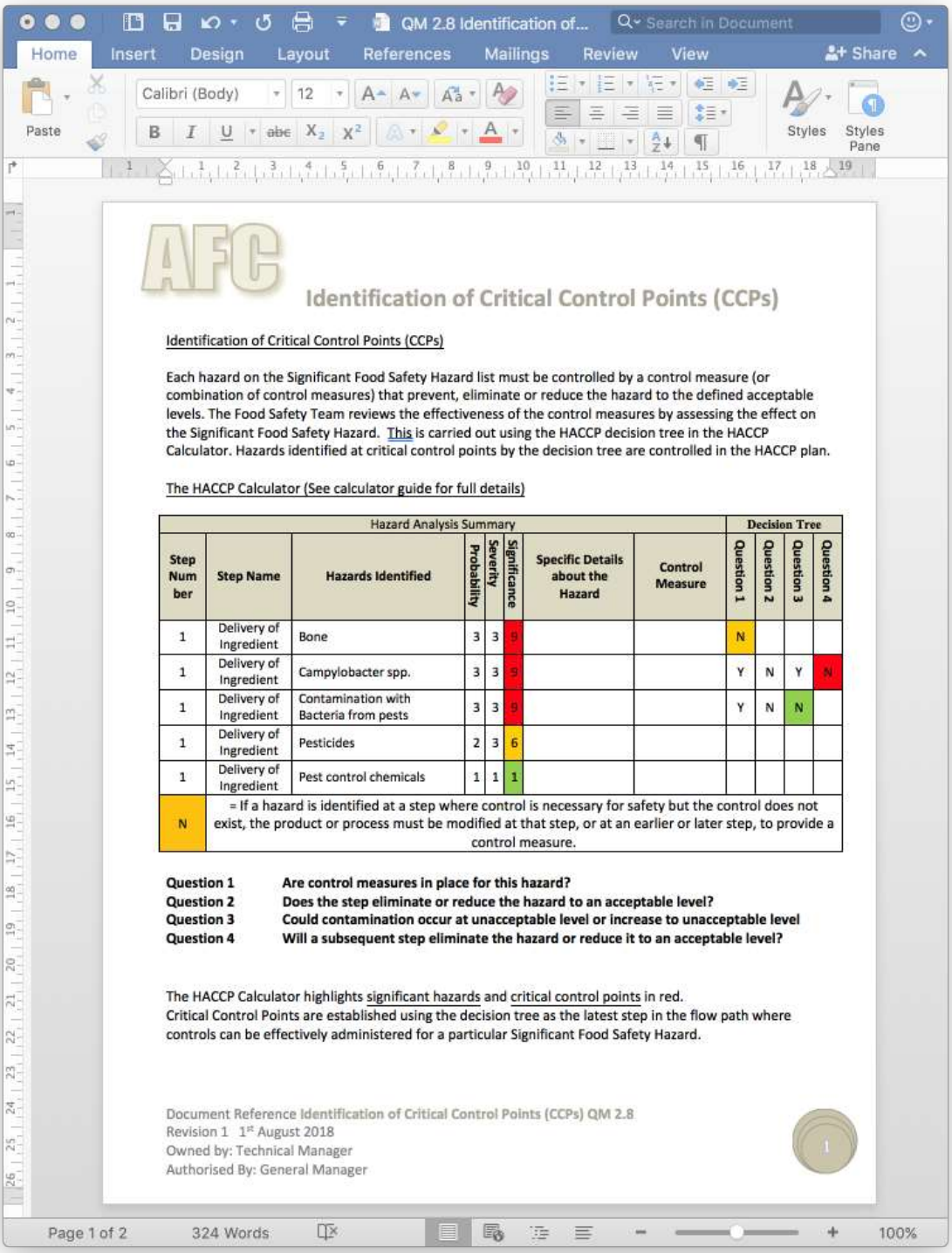
The food safety team assess the food safety hazards

Each potential food safety hazard should now be risk assessed by the Food Safety Team to determine whether its elimination or reduction to acceptable levels is required to produce a safe product and also any controls required to achieve the acceptable levels.

For each step grades of impact (severity of adverse health effects) and probability (likelihood of a food safety hazard occurring) need to be allotted and the combined matrix used to judge the severity and priority for elimination or minimisation of the hazard.

The Food Safety Team should identify the hazards that need to be prevented, eliminated or reduced to acceptable levels.

HACCP Implementation Guide Section 2.8 Determine the Critical Control Points



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Identification of Critical Control Points (CCPs)

Identification of Critical Control Points (CCPs)

Each hazard on the Significant Food Safety Hazard list must be controlled by a control measure (or combination of control measures) that prevent, eliminate or reduce the hazard to the defined acceptable levels. The Food Safety Team reviews the effectiveness of the control measures by assessing the effect on the Significant Food Safety Hazard. This is carried out using the HACCP decision tree in the HACCP Calculator. Hazards identified at critical control points by the decision tree are controlled in the HACCP plan.

The HACCP Calculator (See calculator guide for full details)

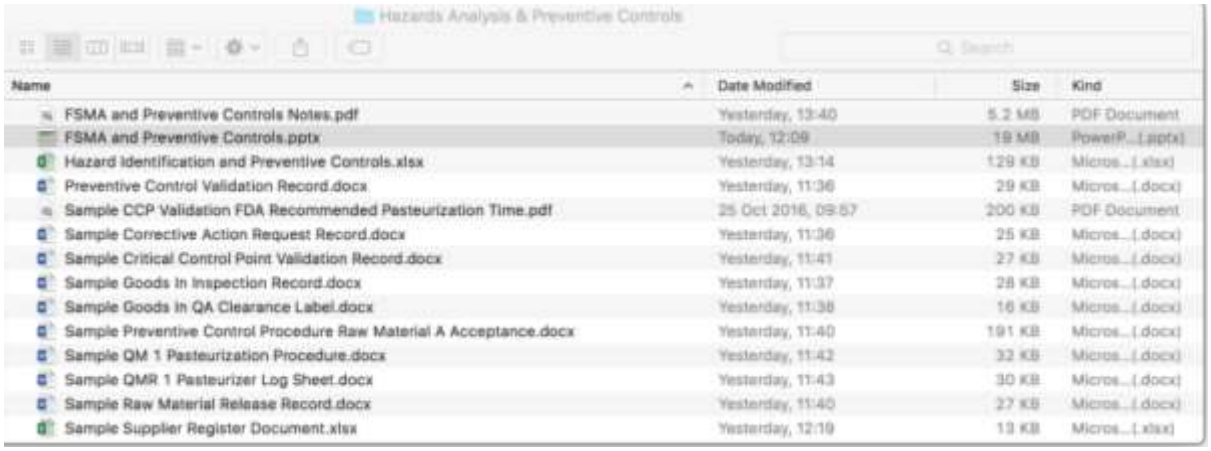
Hazard Analysis Summary							Decision Tree			
Step Number	Step Name	Hazards Identified	Probability	Severity	Significance	Specific Details about the Hazard	Control Measure	Question 1	Question 2	Question 3	Question 4
1	Delivery of Ingredient	Bone	3	3	9			N			
1	Delivery of Ingredient	Campylobacter spp.	3	3	9			Y	N	Y	N
1	Delivery of Ingredient	Contamination with Bacteria from pests	3	3	9			Y	N	N	
1	Delivery of Ingredient	Pesticides	2	3	6						
1	Delivery of Ingredient	Pest control chemicals	1	1	1						
N	= If a hazard is identified at a step where control is necessary for safety but the control does not exist, the product or process must be modified at that step, or at an earlier or later step, to provide a control measure.										

Question 1 **Are control measures in place for this hazard?**
Question 2 **Does the step eliminate or reduce the hazard to an acceptable level?**
Question 3 **Could contamination occur at unacceptable level or increase to unacceptable level**
Question 4 **Will a subsequent step eliminate the hazard or reduce it to an acceptable level?**

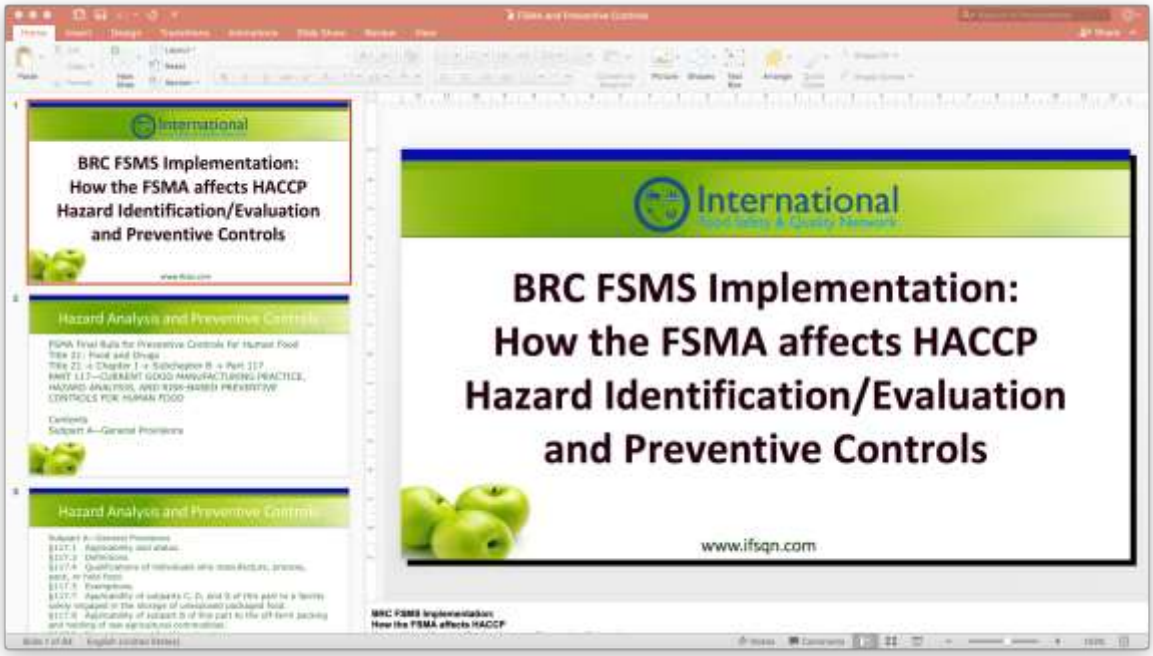
The HACCP Calculator highlights significant hazards and critical control points in red.
Critical Control Points are established using the decision tree as the latest step in the flow path where controls can be effectively administered for a particular Significant Food Safety Hazard.

Document Reference Identification of Critical Control Points (CCPs) QM 2.8
Revision 1 1st August 2018
Owned by: Technical Manager
Authorised By: General Manager

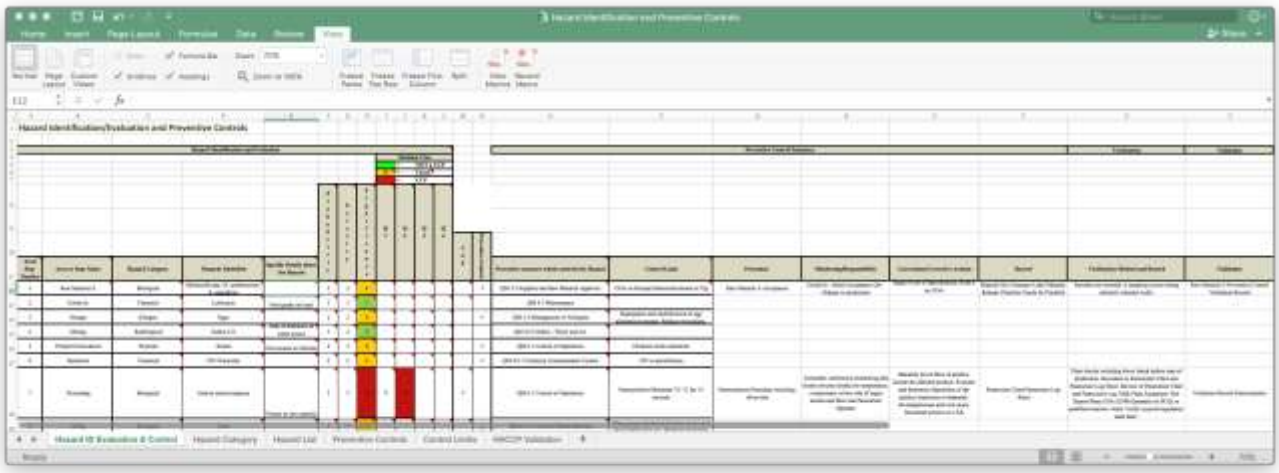
FSMA Module – Hazard Analysis & Preventive Controls

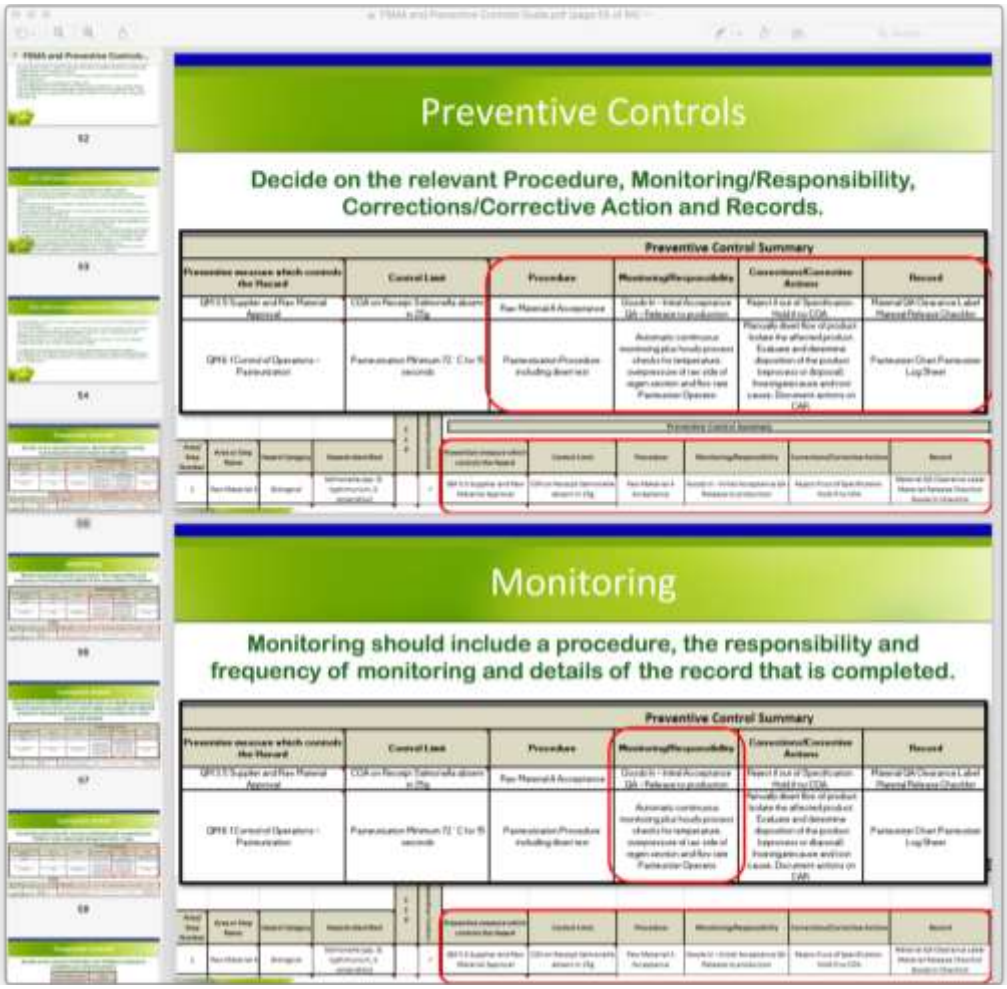


Follow the FSMA Module Preventive Controls Guidance – Instructions are provided in a PowerPoint presentation. Notes are also included.



Includes a Hazard Identification/Evaluation and Preventive Controls Summary Tool:



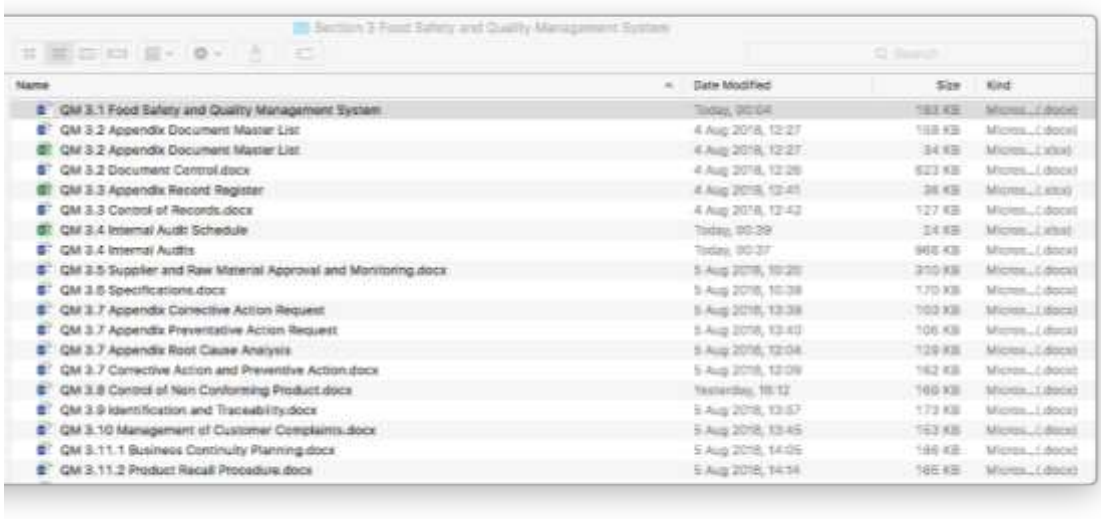


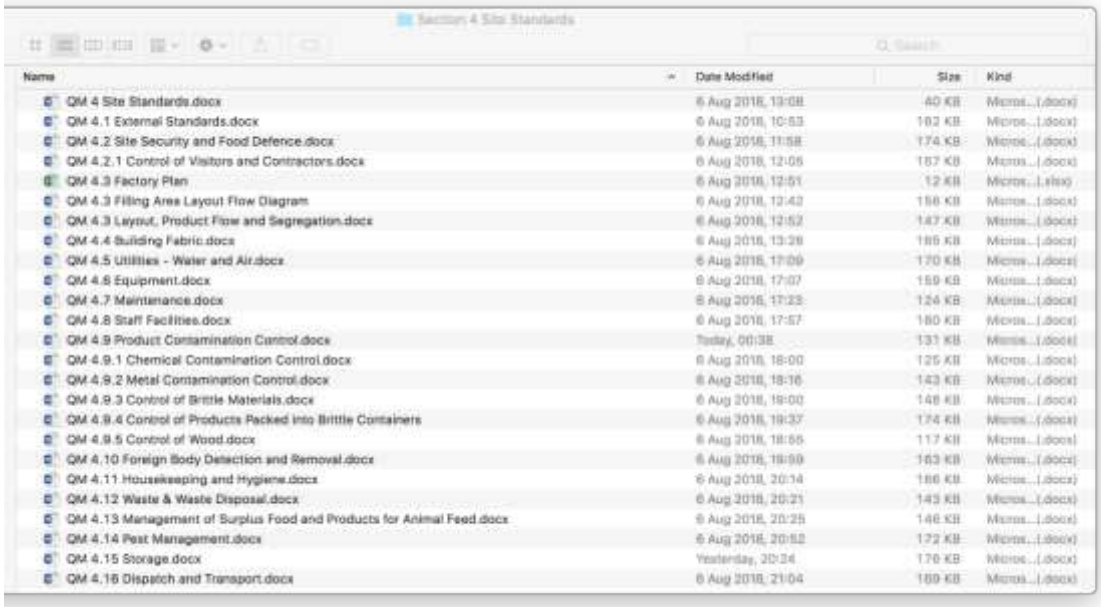
Step Five: Food Safety Quality Management System

Our Food Safety Management System contains a comprehensive BRC compliant documentation package.

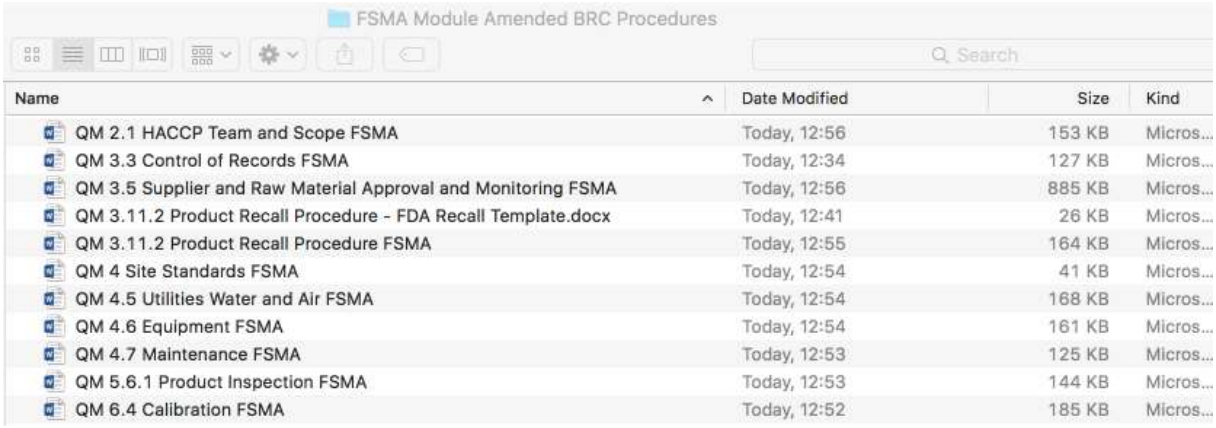
At this stage you can choose to totally implement the procedures supplied or pick those that are applicable to your process.

The Food Safety Quality Manual contains comprehensive top level procedures templates that form the foundations of your Food Safety Management System so you don't have to spend 1,000's of hours writing compliant procedures:





For those implementing the FSMA Module there are the FSMA Module Amended BRC Procedures:



Name	Date Modified	Size	Kind
QM 2.1 HACCP Team and Scope FSMA	Today, 12:56	153 KB	Micros...
QM 3.3 Control of Records FSMA	Today, 12:34	127 KB	Micros...
QM 3.5 Supplier and Raw Material Approval and Monitoring FSMA	Today, 12:56	885 KB	Micros...
QM 3.11.2 Product Recall Procedure - FDA Recall Template.docx	Today, 12:41	26 KB	Micros...
QM 3.11.2 Product Recall Procedure FSMA	Today, 12:55	164 KB	Micros...
QM 4 Site Standards FSMA	Today, 12:54	41 KB	Micros...
QM 4.5 Utilities Water and Air FSMA	Today, 12:54	168 KB	Micros...
QM 4.6 Equipment FSMA	Today, 12:54	161 KB	Micros...
QM 4.7 Maintenance FSMA	Today, 12:53	125 KB	Micros...
QM 5.6.1 Product Inspection FSMA	Today, 12:53	144 KB	Micros...
QM 6.4 Calibration FSMA	Today, 12:52	185 KB	Micros...

These procedures are amended as per the FSMA module requirements:

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HACCP Team

The HACCP team leader is the FCQI and is able to demonstrate competence in the understanding of HACCP principles and their application. The FCQI is responsible for developing the food safety plan, validating preventive controls, reviewing the records, and reanalysing the plan.

The HACCP Team Leader is required to have an in-depth knowledge of CODEX HACCP Principles, developing HACCP (food safety) plans and must be able to demonstrate competence, experience and training. Where there is a legal requirement for specific training, the HACCP Team Leader is required to have received this training/qualification.

HACCP Plan Scope

The HACCP team define the scope of each HACCP (Food Safety) plan including the processes and product covered. This information is included in the documentation contained within the HACCP Manual.

The HACCP documentation contained within the HACCP Manual defines the potential risks and control measures required to safely manufacture the following products: (Enter products here)

HACCP plans cover the process steps from:

- Ingredients
- Intake
- Storage
- Processing
- Filling
- Packing
- Storage
- Dispatch
- Distribution

Scope is defined by consideration of the extent of the food chain, product description and parameters, the intended consumer group and end-use.

Responsibility

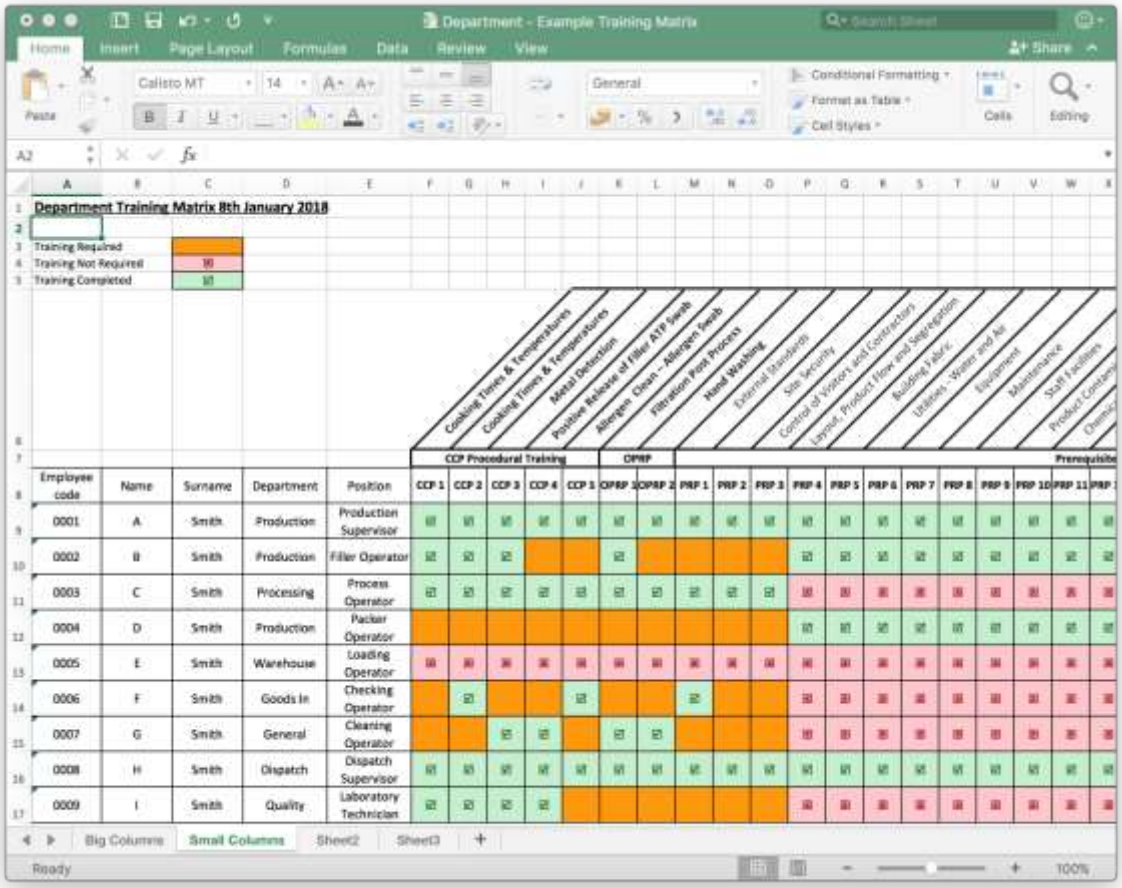
The HACCP Team is responsible for:

- Following HACCP procedures and constructing the HACCP Plans (Food Safety Plans)
- Validation and verification of the HACCP system
- Review of the effects of any factory process or product change on the Food Safety Management System
- Updating the HACCP plans (Food Safety Plans)

Step Six: Training and Implementation

A significant part of the implementation process is training. Job Descriptions should be available for all staff and they should be briefed and aware of their food safety responsibilities.

A training matrix and plans should be drawn up for all staff and the relevant training given based on responsibility and authority.



We have provided a Staff Training Matrix Template in Microsoft Excel Format.

Implementation

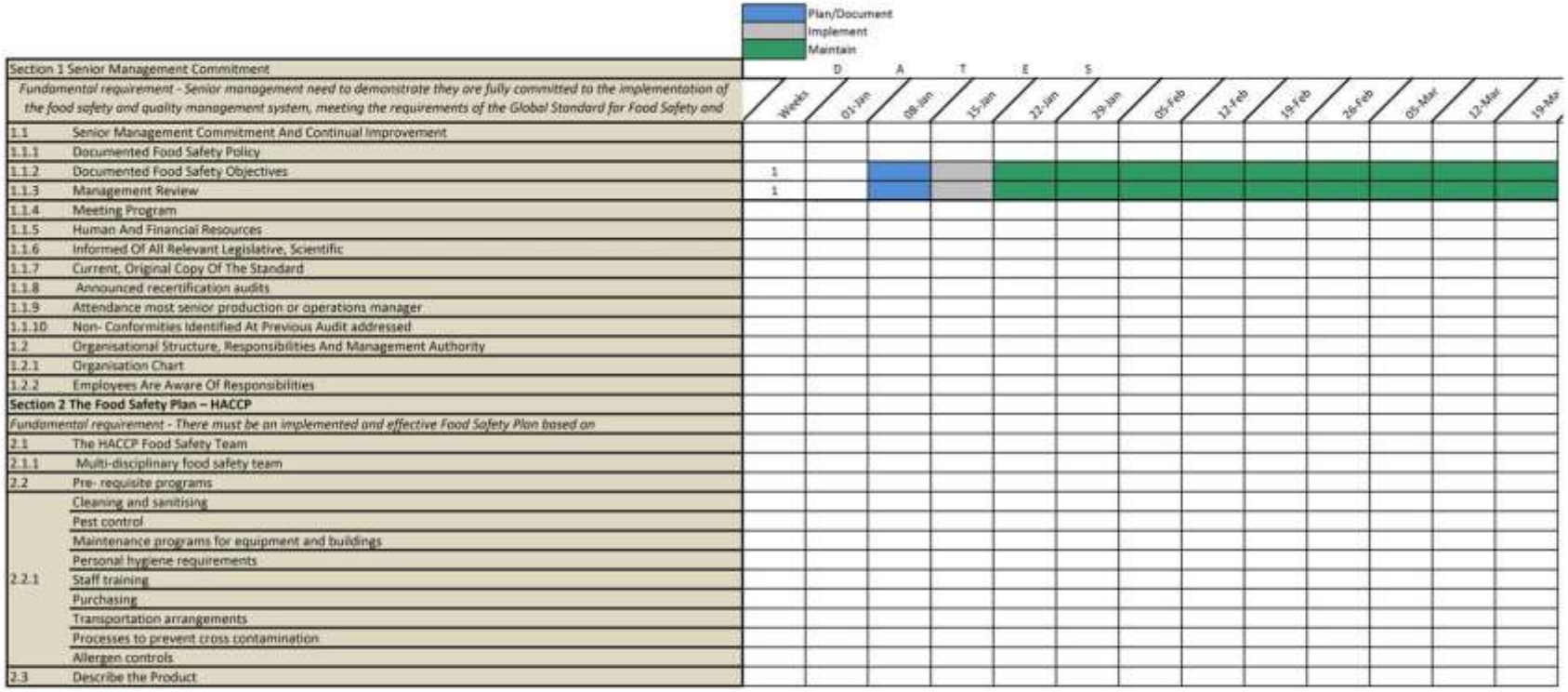
At this stage of the project you will need to ensure:

- ✓ Steering Group are established and briefed
- ✓ The Steering Group take control of the Project Plan established by Senior Management

Food Safety Management System Steering Group			
FSMS Team Member	**Name**	**Position**	**Qualification**
FSMS Team Leader			
FSMS Assistant Leader			
FSMS Team Members			

Project Plan

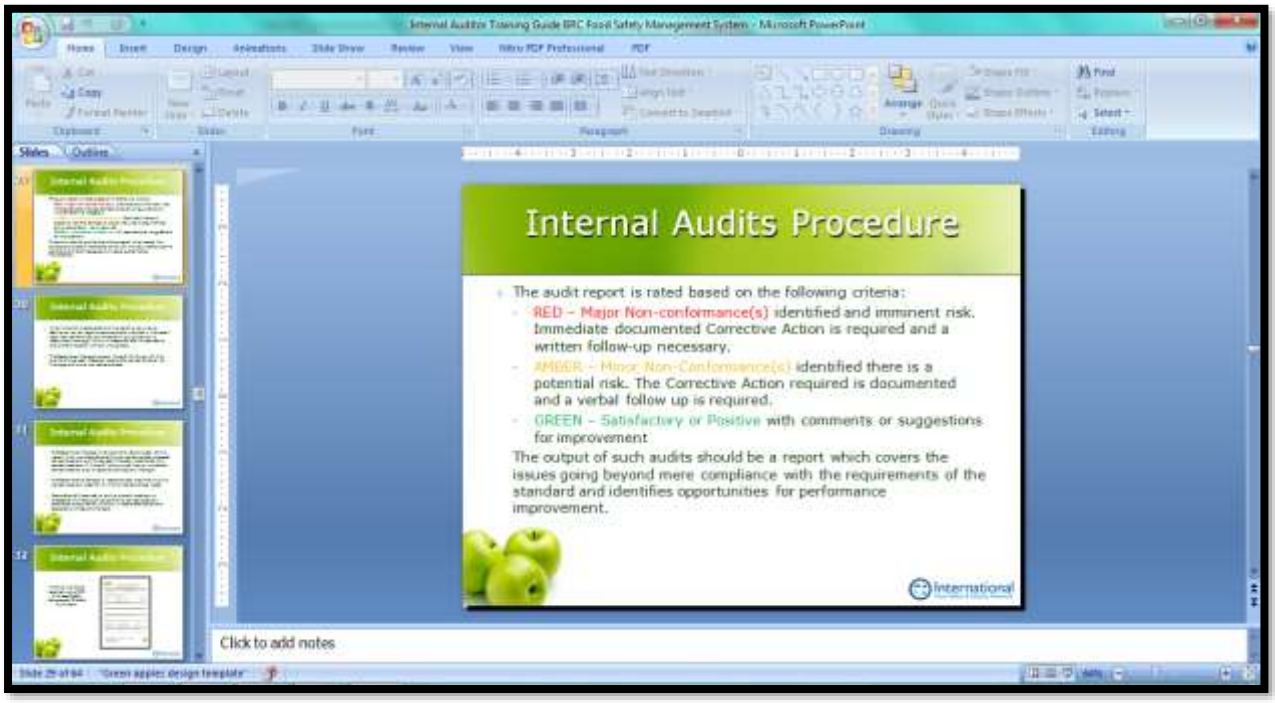
The Steering Group use the Excel Project Plan developed by Senior Management as a step by step guide to implementing the Food Safety Management System.

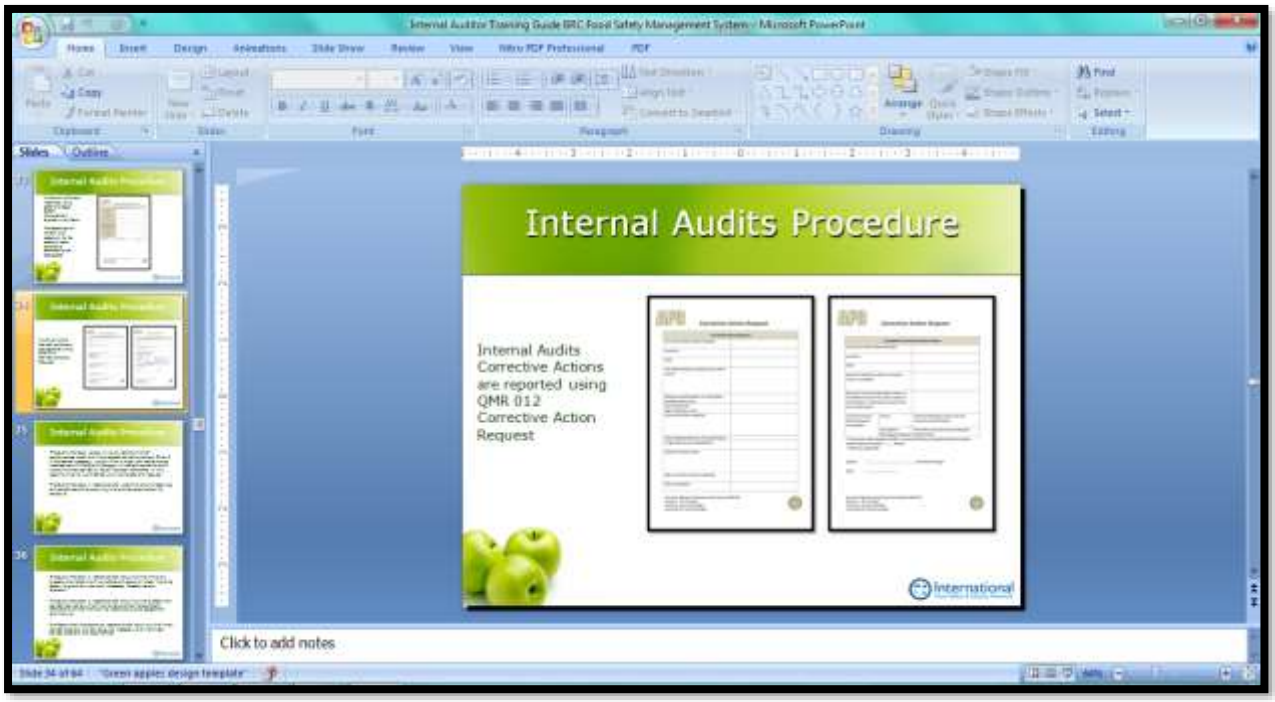


		Plan/Document Implement Maintain												
Section 1 Senior Management Commitment			D	A	T	E	S							
Fundamental requirement - Senior management need to demonstrate they are fully committed to the implementation of the food safety and quality management system, meeting the requirements of the Global Standard for Food Safety and		Weeks	01-Jan	08-Jan	15-Jan	22-Jan	29-Jan	05-Feb	12-Feb	19-Feb	26-Feb	05-Mar	12-Mar	19-Mar
1.1	Senior Management Commitment And Continual Improvement													
1.1.1	Documented Food Safety Policy													
1.1.2	Documented Food Safety Objectives	1												
1.1.3	Management Review	1												
1.1.4	Meeting Program													
1.1.5	Human And Financial Resources													
1.1.6	Informed Of All Relevant Legislative, Scientific													
1.1.7	Current, Original Copy Of The Standard													
1.1.8	Announced recertification audits													
1.1.9	Attendance most senior production or operations manager													
1.1.10	Non- Conformities Identified At Previous Audit addressed													
1.2	Organisational Structure, Responsibilities And Management Authority													
1.2.1	Organisation Chart													
1.2.2	Employees Are Aware Of Responsibilities													
Section 2 The Food Safety Plan – HACCP														
Fundamental requirement - There must be an implemented and effective Food Safety Plan based on														
2.1	The HACCP Food Safety Team													
2.1.1	Multi-disciplinary food safety team													
2.2	Pre- requisite programs													
2.2.1	Cleaning and sanitising													
	Pest control													
	Maintenance programs for equipment and buildings													
	Personal hygiene requirements													
	Staff training													
	Purchasing													
	Transportation arrangements													
	Processes to prevent cross contamination													
	Allergen controls													
2.3	Describe the Product													

Step Seven: Internal Auditing Training & Checklists

Internal Auditor Training - An interactive and illustrated Internal Audit training presentation to train your Internal Audit procedure.





Systems are put in place to verify that the FSMS is implemented effectively including internal audits

So firstly make sure that your Internal Auditors are trained. At least one auditor should be a site expert and we recommend that they undertake a recognised Internal Auditor Course.

The Food Safety Team should define the methods, frequencies and responsibilities for verification activities.

Verification activities should put in place by the Food Safety Team to confirm the effective operation of the Food Safety Management System as well as internal audits verification can be Laboratory Analysis of End Products, Final Product Inspection and similar activities.

After training the Food Safety Team Leader should schedule Internal Audits. Refer to our QM 3.5 Internal Audits Procedure as a guide.

The Internal Audit Schedule should be planned annually and designed to comprehensively cover all areas of the Food Safety Quality Management system including procedures, policies and activities.

The Food Safety Team Leader should draw up the Internal Audit Schedule based on the following criteria:

- Risk associated with the procedure or activity
- Results of Previous audits
- Number of Corrective Actions raised or outstanding
- Customer Complaint Analysis
- Number of Preventative Actions raised or outstanding
- Results of the Management Review

The senior management team carry out food safety management reviews

Senior management should review the company management systems, at a minimum, annually to ensure their continuing suitability, adequacy and effectiveness.

The review should include assessing the opportunity for improvements and the need for amendments to the systems. The proceedings of all reviews are to be documented.

The review meeting is normally chaired by the most Senior Manager and includes Senior Management from Technical, Operations, Engineering, Planning, Distribution and quality departments.

Review inputs include:

- Review of the Food Safety and Quality Policy
- Review of the Food Safety and Quality Objectives*
- Review of Management Changes
- Minutes and Follow-up actions and timescales from previous review meetings
- Outstanding Non-conformances as a result of internal and external audits
- Results of external second and third-party audits
- Trend analysis of Customer and Supplier complaints
- Analysis of the results of verification activities including internal audits, GMP and HACCP plan verification audits
- Food Safety and Quality Key Performance Indicators Review and trend analysis
- Emergencies and Accidents
- Process performance and product conformity
- Corrective and preventive action status
- Food Safety incidents including allergen control and labelling non-conformances, recalls, withdrawals, safety or legal issues
- Review of HACCP systems
- Review of changes which could affect food safety and the HACCP Plan (including legislation changes and food safety related scientific information)
- Review of food defence measures
- Review of ingredient and product authenticity
- Communication activities and effectiveness of communication
- Review of Resources and effectiveness of Training

The senior management team implement actions to continually improve the FSMS

Senior Management should implement actions to improve the Food Safety Management System. This will normally be as outputs from the Management Review:

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Senior Management Review Record

Review Outputs		
	CA or PA Required	By Who Timescale
Review of the Food Safety and Quality Policy	-	-
Review of the Food Safety and Quality Objectives*	-	-
Review of Management Changes	-	-
Minutes and Follow-up actions and timescales from previous review meetings	-	-
Outstanding Non-conformances as a result of internal and external audits	-	-
Results of external second and third party audits	-	-
Trend analysis of Customer and Supplier complaints	-	-
Analysis of the results of verification activities including internal audits, GMP and HACCP plan verification audits	-	-
Food Safety and Quality Key Performance Indicators Review and trend analysis	-	-
Emergencies and Accidents	-	-
Process performance and product conformity	-	-
Corrective and preventive action status	-	-
Food Safety incidents including allergen control and labelling non-conformances, recalls, withdrawals, safety or legal issues	-	-
Review of HACCP systems	-	-

Document Reference Senior Management Review Record QM 1.1.4 Appendix
Revision 1 1st August 2018
Owned by: General Manager
Authorised By: Managing Director

Ensure any areas requiring corrective action are addressed

The non-compliances identified in the assessment of compliance with the BRC Standard should be logged by the Food Safety Team Leader and the appropriate corrective action allocated and taken:

Date	BRC Section/FSMA Module	Details of Non-Conformance	Identified by:	Corrective Action Required	Responsibility	Target completion Date	Date Completed