

SYLLABUS FOR ADVANCED HACCP ASSESSMENT COURSE FOR ENFORCEMENT OFFICERS

Original September 2000

Revised February 2005

INTRODUCTION:

This syllabus has been developed to support the ongoing need to provide high quality training for enforcement personnel working in the food sector. The provision of such training is intended to provide an in-depth working and practical knowledge of food safety management systems based on the Codex HACCP principles and the ancillary knowledge and skills required by enforcement officers. This training is necessary to provide enforcement personnel with the additional skills and ability to both advise on and assess the application of HACCP principles in a wide variety of circumstances and to provide consistent application nationwide. The training is not intended to deal in detail with the difficulties and challenges of introducing a food safety management system to small businesses.

The training is aimed at enforcement personnel actively engaged in advising and assessing HACCP based systems and is specifically tailored to the requirements of enforcement personnel.

The assumption is made that attendees will have a theoretical understanding of the application of HACCP principles. This could be obtained by attending an introductory level course or through practical knowledge and experience of HACCP Principles. Officers who have qualified within recent years should satisfy this requirement. This Course is not suitable for officers who are new to the subject.

AIMS:

The syllabus aims to provide enforcement officers with a sound understanding of the application of the principles of HACCP as published officially in Codex Alimentarius, the relationship between good hygiene practices (Prerequisite programmes) and HACCP based food safety management systems and the expectations of the food business operator in implementing such systems.

The syllabus also aims to further develop the skills required for advising on the use of HACCP based food safety management systems, for assessing the integrity and effectiveness of such systems and actions to be considered where audit has identified deficiencies or failures in the food safety management system.

OBJECTIVES:

- 1 To provide up-to-date general knowledge of HACCP and its relationship with national and international standards, trade requirements and legislative requirements
- 2 To examine the role of good hygiene practices (Prerequisite programmes) as a foundation for HACCP based food safety management systems
- 3 To provide a comprehensive overview of the application of HACCP principles for the development of HACCP based systems within food businesses
- 4 To consider the design and management requirements associated with the application and implementation of HACCP based food safety management systems in food businesses.
- 5 To examine the mechanisms required for an effective assessment of a food safety management systems based on codex HACCP Principles

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- 6 To consider the tools available to educate food business operators in the principles of HACCP.
7. To consider the role of enforcement officers in seeking compliance in respect of HACCP.

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TRAINING OBJECTIVE 1:

To provide up-to-date general knowledge of HACCP and its relationship with national and international standards, trade requirements and legislative requirements

TOPICS TO BE COVERED:	TRAINERS NOTES:
Background and current status of HACCP	Describe the origins and purpose of HACCP. Discuss links with recognised adaptations of HACCP e.g. FSA HACCP Support Models, MLC HACCP for Butchers. Briefly describe current applications of HACCP in UK food industry, sector variations e.g. catering vs. manufacturing
Structured Approach	Discuss the basis on which HACCP is Founded i.e. a structured and preventative approach to designing a food safety management system.
Benefits and Limitations of HACCP	Describe the major benefits and perceived barriers to Implementing HACCP(Ref: WHO/SDE/PHE/99.7pp5-6) <i>Exercise: To encourage delegates to consider the perceived barriers to introducing HACCP.</i> Emphasise the value of a preventative approach and the need to reduce retrospective quality control. Briefly discuss issues for HACCP in small and medium sized businesses e.g. documentation and record keeping. Discuss common pitfalls encountered in introducing HACCP.
Principles of HACCP	Detail the principles of HACCP, logic sequence and terminology used in Codex Alimentarius. (Link with TO3)
Background to Codex Alimentarius Commission (CAC) and its relevant committees	Briefly discuss the roles of the World Health Organisation (WHO) and Food and Agricultural Organisation (FAO) and their relevant committees.
HACCP and international trade	Briefly discuss the World Trade Organisation (WTO) General Agreement on Tariff and Trade (GATT), Sanitary and Phytosanitary Standards (SPS) and Technical Barriers to Trade (TBT) and 'equivalence' issues, including the role of Mutual Recognition Agreements and Memoranda of Understanding in resolving trade disputes.

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Role of HACCP within other international management standards frameworks	<p>Briefly discuss the relationship between HACCP and other standards eg ISO9001, ISO22000, BRC and IFS.</p> <p>Discuss, if necessary, the misuse of the term 'Health & Safety' in connection with food safety.</p>
Other relevant committees and their outputs	<p>Briefly review HACCP information available from internationally recognised sources e.g. NACMCF, ILSI</p>
Legislative requirements	<p>Briefly review HACCP within current food safety related legislation within the UK. (See TO2).</p> <p>Discuss recent and impending changes to food safety legislation including likely timescales. Introduce the concept of 'competent authority'.</p> <p>Discuss the role of enforcement personnel in respect of food safety management systems based on Codex HACCP food safety legislation.[Link with TO6]</p>
Certification	<p>Discuss the opportunities for enforcers from HACCP certification and the strengths and weaknesses associated with certification. Eg. greater confidence in the use of accredited assessment bodies.</p>

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TRAINING OBJECTIVE 2:

To examine the role of good hygiene practices (prerequisites programmes) as a foundation for HACCP based food safety management systems

TOPICS TO BE COVERED:	TRAINERS NOTES:
Legislative requirements for hygiene practices	Refer to specific requirements in the relevant regulations. Discuss differences in application between small and larger companies and expectations [Link to TO1]
Prerequisite programmes and general principles of food hygiene	Define and discuss 'Prerequisite Programme' (PRP) and Good Manufacturing Practice (GMP). (Ref: Codex Alimentarius Food Hygiene Basic Texts) Discuss the role of Industry Guides.
Relationship between good hygiene practices, Prerequisite Programmes and HACCP	Consider how elements of good hygiene practice may be handled to support a HACCP system and which should be included in the HACCP plan. Discuss common misconceptions about PRPs, including <ul style="list-style-type: none">• The need to include all issues within the HACCP Plan, when they are also covered in PRPs• The exclusion of all issues included in PRPs from HACCP, regardless of the significance of the hazard. [Link to TO3]
Evaluation of the existing prerequisite programmes/hygiene practices	Describe the need for the business to assess and review existing programmes and practices to determine adequacy. Emphasise need to identify deficiencies in PRPs and take corrective action. Discuss techniques for managing corrective actions e.g. action plan
Confirm effectiveness of prerequisite programmes	Explain the expectation that PRPs will be regularly assessed by the business to evaluate their effectiveness. Discuss the role of enforcement personnel in the evaluation of effectiveness of PRPs/good hygiene practices in line with current protocol. <i>Ask delegates to complete an exercise.</i>

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TRAINING OBJECTIVE 3:

To provide a comprehensive overview of the application of HACCP principles for the development of HACCP based systems within food businesses

TOPICS TO BE COVERED:	TRAINERS NOTES:
Systematic and thorough approach to Hazard Analysis	Emphasise the importance of hazard analysis and the approach taken.
- Preparation for hazard analysis	Consider PRPs and their management. Explain the need for preparatory work, including stipulation of scope, a description of the product/process and the preparation of a process flow diagram and involvement of key personnel who understand the process or have access to relevant information.
Identification of hazards and their sources/causes (Principle 1)	Explain the need for clear identification of the cause or source of the hazard/s to enable selection of appropriate control measures. (See TO6: Sources of information)
- Assessment of significance of hazards	Consider tools and techniques available for assessing the significance of hazards. Compare qualitative and quantitative methods and provide examples.
- Effective design of Control Measures	Discuss control measures and the need for their correct selection, assessment of adequacy and validity.
Determination of Critical Control Points (Principle 2)	Discuss the tools for the identification of Critical Control Points including decision trees e.g. Codex. Ensure delegates understand that Critical Control Points, as identified by the food business, should be considered and assessed and not just accepted by enforcement officers. Contrast CCP's, Quality Control Points, Legal Control Points, and Process Control.
Determination of Critical Limits (Principle 3)	Discuss Critical Limits and their determination. Include the need for validation of Critical Limits. Discuss the use of other limits e.g. processing parameters, warning/action limits, target levels and their relationship with Critical Limits.

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Design and documentation of Monitoring Systems (Principle 4)	<p>Discuss the need to design reliable and practical systems for monitoring control at the Critical Control Point.</p> <p>Consider the parameters to be monitored, the method to be used, the frequency and timing of monitoring and allocation of responsibility.</p> <p>Discuss the need for support documentation (e.g. work instructions) and record keeping</p>
Design and documentation of Corrective Action Systems (Principle 5)	<p>Discuss the design of Corrective Action, including the actions to be taken to rectify the loss of control/problem and the actions required to contain and deal with affected product</p>
Establish Verification Systems (Principle 6)	<p>Define verification and briefly describe how verification may be achieved and the need for management. (Ref: TO4).</p> <p>Define validation and the requirement for validation of Critical Limits and Control Measures.</p> <p>Describe when and how validation should take place and describe the techniques that may be used for validation purposes</p> <p>Compare and contrast validation and verification.</p> <p>Discuss review as part of the Verification Principle.</p>
Establish documentation (Principle 7)	<p>Explain the requirement for documentation of the HACCP system including systems and records.</p> <p>Discuss the levels of documentation appropriate to the size/scale of the business</p> <p><i>Exercise: Delegates to discuss alternatives/acceptability of documentation in small and larger businesses</i></p>
Role of generic plans	<p>Consider the role of generic plans (i.e. those produced as a model for a specific industry sector) and the need for tailoring prior to use.</p> <p>Consider the role of national support models ie. Safer Food Better Business</p>

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TRAINING OBJECTIVE 4:

To consider the design and management requirements associated with the application and implementation of HACCP based food safety management systems in food businesses.

TOPICS TO BE COVERED:	TRAINERS NOTES:
Managing the change to using HACCP	Consider and discuss the issues associated with application of HACCP in large and small businesses, including issues associated with lack of resource in small businesses and non-availability of HACCP plans in large businesses where documentation is held centrally.
Commitment within the company management	Describe the importance for commitment from company management Briefly discuss the need for and importance of leadership within the business. Discuss role of enforcement personnel in providing encouragement and advice/support particularly in smaller companies. Briefly discuss the benefit of a team approach and consider its composition for effective development of HACCP
Personnel resources for developing a HACCP system	Briefly discuss the requirements and the difficulties facing smaller businesses with limited resource and expertise. Develop acceptable solutions for small companies (Ref: WHO/SDE/PHE/FOS/99.7 p20)
<ul style="list-style-type: none"> - HACCP team - Training needs for HACCP team members 	Briefly detail the requirements (skills, abilities, and knowledge) necessary for team members; discuss the value of formal training and qualification, recognition of the value of team roles and leadership
The HACCP system structure and documentation format	Discuss the options for the structure of the HACCP system (e.g. product based, process based or modular). Discuss the structure of the HACCP plan and supporting documentation including expectations within large and small businesses. Discuss the approach of the Commission towards flexibility in the application of HACCP principles for small & micro businesses (DG SANCO)

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Software for practical HACCP Management including Predictive Modelling	Briefly describe the software available on the market for assisting with HACCP development and discuss applicability and accessibility for smaller and less developed businesses.
Definition of implementation	Define implementation i.e. the transition from the completed documented study to a fully operational and practical system.
Preparation for the implementation of the HACCP Plan	Discuss the requirements for implementing the HACCP plan i.e. confirmation that the HACCP plan is valid (process flow diagram is accurate, principles of HACCP have been correctly applied, Critical Limits and control measures have been validated), that control measures are in place and operational. PRPs are in place and operational.
Validation	Review and discuss typical methods of validation. Emphasis the importance of effective validation by the business prior to implementation.
Methods of implementation	Discuss the approaches to implementation. Compare and contrast the approaches suitable in small and large companies. Consider training needs, culture, handover of responsibilities, role of those involved in developing the HACCP plan
Barriers to effective implementation	Discuss the likely barriers to effective implementation including <ul style="list-style-type: none">• Management culture• Resistance to change• Ineffective communication• Inadequate planning Discuss strategies for overcoming problems (Ref: WHO/SDE/PHE/FOS/99.7 pp6-12) <i>Ask delegates to identify examples and discuss as a tutor led activity</i> Discuss the need for confirmation of effective implementation.
Verification of the HACCP system	Explain that the responsibility for verification is primarily the responsibility of industry. Discuss the role of the food business operator vs. enforcement personnel, in respect of verification in small businesses. Compare internal vs. external verification and the role of certification schemes
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Scope of verification	Discuss the scope of verification i.e. to include HACCP system, control measures, PRPs. Discuss the advantages and disadvantages of sampling for analysis.
- Verification frequency	Discuss scheduling of verification activities, requirement for planning and the basis for the setting of appropriate frequencies
- Verification methods	Discuss the methods which may be used for verification purposes including audit/assessment (Ref: TO5), review of system documentation and records e.g. customer complaints, sampling and testing. Discuss the need for responsibilities to be allocated for verification activities.
- Verification skills	Discuss the competencies required for those verifying HACCP, particularly for those in small businesses.
HACCP Maintenance and Review Activities	Discuss the need for HACCP system to be maintained and reviewed regularly including: <ul style="list-style-type: none">• Scheduling/planning routine reviews• Reviews conducted in response to change/issues.• Updates in response to new information.
Record Keeping	Discuss the requirements for record keeping including legibility and accessibility. Discuss how requirements may differ due to the nature and size of the business. i.e. DG SANCO document on flexibility for smaller businesses

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TRAINING OBJECTIVE 5:

To examine the mechanisms for an effective assessment of HACCP based food safety management systems based on Codex Principles

TOPICS TO BE COVERED:	TRAINERS NOTES:
Purpose and scope of assessing HACCP within the food industry	Explain the purpose of assessing HACCP within the food industry i.e. to obtain evidence that HACCP principles have been effectively applied, the HACCP plan and prerequisites are correctly implemented and that the system has been maintained.
Consideration of the desired competencies of those assessing HACCP systems	Ref: WHO Report: Role of government in assessing HACCP systems 2-6 June 1998 p12 including familiarity with process requirements.
Assessment Skills	Definition of audit Briefly review audit/assessment skills including interviewing, observing, sampling, testing, recording, collection of objective evidence. Briefly review different interview techniques, types of questions, understanding the response with regard to HACCP. Briefly review the approaches to effective time management.
Audit Protocol: Overview	Provide an outline of audit protocol and compare with current inspection protocol.
Planning and Preparation	Discuss the need for planning the assessment including the scope of the assessment and the approach to be taken during the assessment including the need to determine the approach taken on site to PRPs and good hygiene practice. Discuss need for familiarisation with site information and preparation/tailoring of a checklist.
Use of Checklists/aide memoire	Discuss the design and use of checklists/aide memoire, their advantages and potential problems (Ref: WHO Report: Role of government in assessing HACCP systems 2-6 June 1998 p30).
Opening Meeting	Discuss the role and value of the opening Meeting. Explain the process for opening Meetings.

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<p>Practical HACCP Assessment</p>	<p>Discuss practical approaches to assessment of HACCP systems. Detail the ways in which HACCP plans can be assessed and the types of questions to be asked. Highlight common problems with the application of each of the principles of HACCP. This must include assessment of hazard analysis and the assessment of the significance of hazards. [Link with TO3] Provide examples of practical hints and tips for successful HACCP assessment. (Ref: WHO Report: Role of government in assessing HACCP systems 2-6 June 1998 p26) Discuss need for objective evidence to demonstrate that the HACCP system or the PRPs would not ensure food safety <i>Ask delegates to prepare a checklist for Assessing a HACCP system</i></p>
<p>Closing Meeting</p>	<p>Discuss the value of closing meeting, Elements to be included in the closing meeting, including reports of positive and negative points and responsibility for identifying and agreeing actions to be taken in response to findings, including timescales.</p>
<p>Reporting, Recording and File Records</p>	<p>Discuss the options for reporting findings in response to a HACCP assessment and requirements for file records. (Ref: COP & Practice Guidance)</p>
<p>Actions following Assessment and Follow up Activities</p>	<p>Discuss the necessity for follow up activities to ensure that deficiencies identified have been satisfactorily addressed. Discuss the use of trade bodies and expert organisations as sources of information in resolving differences of [Link to TO6] Discuss prioritisation and need for establishing timescales for corrective actions and future reassessment</p>
<p>Role of Industry Guides & Codes of Practice</p>	<p>Discuss the role of Industry Guides Codes of Practice and generic plans as a reference for particular industry sectors.</p>

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TRAINING OBJECTIVE 6:

To consider the tools available to educate food business operators in the principles of HACCP

TOPICS TO BE COVERED:	TRAINERS NOTES:
Communication Skills	Remind attendees of the key skills required for effective communication including listening skills, careful use of jargon/inappropriate terminology, keeping messages simple and straightforward, giving information as well as receiving, provision of support information to reinforce messages.
Training & Education	Remind attendees of the key skills required for training and education. Discuss the ways in which these skills can be used to promote practical application of HACCP. Discuss the problems associated with HACCP training (Ref WHO Workshop on Training in HACCP, Geneva, 1-2 June 1995)
Tools and Techniques	Briefly discuss the ways of 'motivating' smaller businesses e.g. provision of leaflets, posters, 'awards', generic plans, national support models.
Sources of Information	Detail reliable sources of information for enforcement personnel and for industry Discuss sources of information that may be available including HACCP literature, approved guidance documents, industry/trade associations, internet, libraries. Highlight the difficulties of determining suitability of information available in the public domain

