

# UPDATED GUIDANCE ON ASSESSING SAFER FOOD, BETTER BUSINESS

This guidance has been updated with the changes shown in bold.

## 1. Introduction

- 1.1 This document provides a tool for assessing the degree of implementation of the 'Safer Food Better Business' (SFBB) system against the requirement of Regulation 852/2004 for food businesses to use food safety management systems based on HACCP principles.
- 1.2 It is intended as a working document to allow for increasing experience in assessing the approach by users that will be incorporated over time.

## 2. General

- 2.1 Annex 13 of the Food Law Practice Guidance on the Approach to Enforcement provides general guidance on the requirement for food safety management procedures based on HACCP principles. This document provides supplementary guidance specifically aimed at assessing SFBB implementation and should be used in conjunction with the SFBB progress evaluation form, appended in Annex 1 of this document.
- 2.2 The evaluation form introduces a simple scoring matrix and enables environmental health practitioners to **assess and formally** record the progress made by individual businesses in implementing SFBB. Local authorities may also wish SFBB **consultants and** coaches to use the form **informally** in assessing and recording progress, **particularly in catering premises.**
- 2.3 The objective of the assessment of SFBB implementation is to determine whether the business:
  - *understands the significant hazards presented by their operations and has them under control at all times*
  - *has documented the systems for controlling these hazards through the completion of relevant Safe Methods*
  - *has established procedures i.e. corrective actions to undertake when things go wrong*
  - *is complying with the system as documented*
  - *is recording their compliance, where incidents have occurred and the corrective actions undertaken, in the SFBB diary*
  - *is reviewing the system to ensure that hazard control is maintained or that controls are established for any new hazards that arise*
  - *has appropriately trained managers and staff to operate the system.*

- 2.4 The above assessment can be achieved by:
- (a) *questioning to obtain assurance that the person responsible for food safety ensures that significant hazards are understood and controlled,*
  - (b) *seeing that there are written procedures that demonstrate how the business controls these hazards at all times*
  - (c) *seeing sufficient practical evidence that these procedures are followed and that they are reviewed and kept up to date.*
- 2.5 SFBB is a flexible, modular system that can be part of, or work with elements from other existing hazard control systems. SFBB is targeted at small catering and retail operations. Where larger operations are being assessed, the need for further management systems to ensure the system is operating appropriately must also be considered. Where there is an existing demonstrably competent HACCP based system in place, there is no need to replace it with SFBB.
- 2.6 Assessment of SFBB implementation should be carried out on site. Any assessment is by its nature a snap-shot of the on-going business processes and the focus will be on questioning around records and documentation. Whilst on site the assessor can also observe compliance with procedures in practice and this will play an important role in considering the overall success of SFBB implementation.
- 2.7 The Food Business Operator (FBO) is responsible for the food safety system and should be present to assist in the assessment. In the majority of small catering **or retail** businesses this will be the owner/manager. As outlined in the Code of Practice, the overall operation of the business should be discussed with the FBO. **For caterers and for retailers, who also do some preparation or cooking of food,** this will include a consideration of the menu items, their methods of catering/production, the business design and construction, facilities, equipment and the number and roles of staff in the business. This will allow for a subsequent assessment of:
- (a) Whether the pack is appropriate for that business, or if supplementary information or an alternative system is required.
  - (b) Whether the pack has been implemented appropriately.
- 2.8 Consideration should also be given to:
- understanding the **nature and activities of the** business,
  - the documentation via the safe methods,
  - whether the manager and staff are trained in the procedures,
  - the record keeping provided in the diary and 4 weekly reviews, and
  - the level of understanding demonstrated by the FBO and staff in discussing each element.

### 3. Evaluation of SFBB Implementation

- 3.1 The following guidance should be read in conjunction with the SFBB progress evaluation form. Local authorities may want to customise Part 1 of the form to fit with any local arrangements for recording business details and findings. The first part of the form should be used to record business details including the business's unique reference number. The type of business should also be recorded. In most cases, the same definitions as those used in the Agency's UK Survey of Food Premises 2005 have been used, and these definitions are included as Annex 2.
- 3.2 The size of the business should be recorded in terms of the number of full time equivalent (FTE) food handlers.
- 3.3 Any interpretation and translation needs should also be recorded, together with the relevant languages where applicable.
- 3.4 A simple scoring matrix has been drawn up and the assessor is asked to consider each specific assessment criteria in turn and to record the most appropriate score. Guidance on areas to consider for the individual criteria is provided below. Assessors can use the Safe Method **Completion Record** in the SFBB pack to help decide on areas to focus on. The full range of scores available should be used as the SFBB assessment scheme will be hampered by cautious marking. The comments boxes should be used to note any problems and any good approaches adopted in respect of each specific criteria. The reverse of the form can be used to record any additional information as necessary.

#### **Q1. Are there safe documented methods for all relevant 4C's?**

- 3.5 Safe Methods provide the documented system/procedures, outlining the hazards and how these are controlled and helping to demonstrate that the system is valid. The selection and adaptation of safe methods should provide sufficient documentation to ensure that appropriate procedures are in place to control each significant hazard.
- 3.6 Practical points to check include:
  - Can menu items or processes be linked to generic Safe Methods and 'check its'?
  - Have they produced their own new Safe Methods?
  - Have they significantly altered any Safe Methods?
  - Does the business already have existing systems to control significant hazards and are these appropriate (e.g. cleaning schedules)
- 3.7 Find out whether the FBO has been through the pack and reviewed and adapted the Safe Methods from the 4C's sections. Where new methods have been produced or methods have been altered to a large degree, consider whether these need validating and if any validation has been undertaken (see 'Prove it' safe methods in the Management sections **and/or 'Prove it- cooking' in the Cooking and Preparation**

**section in the retail pack.)** Consideration can be given to appropriate industry guides to assist in such circumstances.

3.8 It may be useful to assess progress under this assessment criteria by picking one of the Safe Methods from each of the 4C's, and reviewing it with the manager. Alternatively each C section may be considered separately over a period of visits. The following examples could be considered:

- **Cross contamination - for caterers you can check** the practices relating to use of cleaning cloths - where do staff put dirty cloths and is it the same as in the SFBB pack etc. **For retailers only the pest control safe method requires any adaptation. Check to see if the stock room is organised in the way described in the safe method.**
- **Cleaning - for both caterers and retailers you can check** whether the cleaning schedule has been completed or is there an effective alternative in place? There should be an understanding of the most important things to clean based on food safety risks. Check to see if they know how often one item should be cleaned and how this is to be done. See if that day's cleaning has been completed so far.
- **Chilling - for caterers you can check** which options have been selected for chilling down hot food and whether any new chilling methods have been validated using the 'Prove it' section in the diary. If they have filled in another method, then check to see if the 'Prove it' section has been followed and look at the 'Prove it' records in the diary. **For retailers you can check which method is used to monitor the temperature of chilling equipment in the 'Chilled Storage and Display' safe method.**
- **Cooking – for caterers check** whether menu items or processes have been linked to appropriate checks. The 'Checking your menu' section should be reviewed to check if particular menu items are allocated against it. One option is to randomly pick some items from the menu and ask the manager where the relevant Safe Methods are. If any of the 'Your check' boxes for 'Cooking' have been completed - ask to see how the 'Prove it' section in the diary has been followed to validate these other checks. For any method that has a check created by the business, there should be evidence that it is valid – for example manufacturers instructions for equipment or proof that the method ensures food reaches the appropriate temperature with a probe thermometer or other alternative method. **For retailers the cooking safe methods should be reviewed with the FBO to ensure that all the cooking processes undertaken have been considered.**

**Q2. Do Safe Methods reflect actual business practice, including any extra/adapted Safe Methods?**

- 3.9 In making an evaluation assessment against this assessment criteria, consider whether the Safe Methods reflect the business procedures in practice, by observation and questioning.
- 3.10 Has the FBO appropriately removed any methods which don't apply to their business – **for a caterer** those most likely to have been removed are those for hot holding, ready to eat foods, freezing and defrosting. Has the FBO appropriately adapted existing safe methods or produced new methods? **For retailers have the appropriate safe methods in the cooking and preparation section been completed, or removed, if not required.**
- 3.11 Any changes in the **equipment or menu (if applicable)** used since introduction of the pack should be discussed and any amendments made to the system reviewed.

**Q3. Are Safe Methods being followed in practice?**

- 3.12 In order to make an evaluation against this assessment criteria, consideration should be given to the processes being carried out at the time of the assessment. Use observation and questioning of the FBO and staff to find out whether these reflect the Safe Methods adopted by the FBO.
- 3.13 Cross check corrective actions against diary records and safe methods selected e.g. if food is undercooked – whether arrangements are made for cooking longer and if staff have received appropriate instruction/training.
- 3.14 Where assessors find significant problems with implementation of safe methods in practice, this may not only impact on the scoring under this section, but may also influence their assessment under criteria 4-7 relating to management checks.

**Q4. Are management's daily/weekly monitoring checks adequate/appropriate?**

- 3.15 Consider whether the Management section has been completed appropriately. Are the opening and closing checks appropriate? Have any 'extra checks' been included? Are these appropriate?

**Q5. Are management's daily/weekly checks carried out (including corrective actions) and recorded in diary?**

- 3.16 The diary is essential to maintain the standards set by the documentation. It should provide sufficient evidence to demonstrate that control of the system is being maintained, particularly by enabling the assessor to verify whether the procedures set out in the adapted safe methods selected have been complied with.
- 3.17 When reviewing the diary consider:

- Is it signed on each page and does it have appropriate entries?
  - Are incidents and corrective actions being recorded?
  - Have any extra opening and closing checks been added to the management section/diary?
  - Are the opening and closing checks completed in the diary?
  - Have problems been tackled or are they recurring?
  - Is there any independent data – e.g. customer complaints?
- 3.18 Examples of common exception reports in the diary are inadequate cleaning, high refrigeration temperatures and inappropriate food storage.

**Q6. Has 4-weekly review been carried out and acted on?**

- 3.19 This forms an important part of the food safety management system. Check that the 4-weekly review page has been completed and signed.
- 3.20 Does it appropriately summarise the activities within the review period? Have any recurring problems been identified? Was appropriate action taken to address these problems? Were any Safe Methods changed to avoid similar problems in future? Were any training/staff instruction needs identified? Have they been met? Is there any independent data – e.g. customer complaints which need to be considered? Check on any changes to menus/**products sold** or suppliers in specific months/since previous assessments and confirm that relevant reviews of Safe Methods have taken place.

**Q7. Are staff and management trained in Safe Methods and competent to carry out checks required?**

- 3.21 The manager can be questioned on their understanding of the system, as can the staff.
- 3.22 The level of understanding required by the FBO is that which allows relevant hazards in the business to be controlled by identification and implementation of procedures through the SFBB system and an ability to recognise where any changes to the system require new procedures to be considered.
- 3.23 The level of understanding required by the staff should be sufficient to ensure that the tasks they are responsible for are carried out effectively and safely in accordance with the Safe Methods. There is no need for the manager or staff to have an understanding of HACCP principles or methodology.
- 3.24 Is the workforce trained/aware of the Safe Methods? This can be checked for in the training section of the diary and by questioning the manager or staff dependent on their roles. This will also help highlight **if all relevant Safe Methods have been completed** and the degree to which they are being followed.

- 3.25 The assessor should make a general check on staff knowledge as they go around the business considering the methods selected.
- 3.26 The new Regulations do not require attendance at formal training courses as evidence of training for the manager or staff. The requirement is that the manager of a business should be trained in developing and maintaining a food safety management system proportionate to their business, and not simply trained in HACCP principles. Formal training may not be necessary to achieve the objective of having the required competencies. In practice, on the job training may be appropriate, such as where a business successfully works through and implements the pack and/or has attended a local authority seminar on SFBB. **It is anticipated that the majority of retailers will be able to work through the pack themselves, although some may benefit from attending a workshop, particularly those that need to complete the 'Cooking and preparation' section.**

**Q8. Overall assessment:**

- 3.27 The 7 individual scores should be totalled and entered on the Progress Evaluation Form.
- 3.28 Future actions should reflect the graduated and educative approach to enforcement as set out in Annex 13 of the Code of Practice Guidance. In determining future actions consideration should be given to the following:
- SFBB is a modular and incremental system. Targets can be set for the FBO to work through and use sections of the pack before the next visit.
  - Corrective actions can be examined – can problems be designed out?
  - The idea of SFBB is that there is continuous improvement of the system. The manager should be encouraged in their use of the review section to ensure this.
- 3.29 In terms of enforcement, relevant businesses that do not have fully effective food safety management **procedures**/SFBB system in place should not have formal action taken against them for this alone, provided they are clearly making timely progress towards this goal and no imminent health risks are identified at the time of assessment.