

GUIDELINES FOR IMPLEMENTING GMP IN FOOD PROCESSING

9. Management Control

9.1 *Interest from Board level*

9.1.1 The company should have a food safety and hygiene policy statement, which may be positioned at strategic points throughout the factory.

9.1.2 The company's quality philosophy and commitment to the management of it, must be demonstrated at the highest level. The main board of directors whether executive or non executive must contribute to the quality management system through their own job description or responsibility.

9.1.3 Involvement in the production environment should take the form of regular factory tours, communication with 'on line' operatives, review/discussion meetings with senior managers and motivation of staff by encouragement and reward.

9.1.4 The board of directors should be fully conversant with the principles of good manufacturing practice and have a comprehensive awareness of food hygiene.

9.2 *Communications to production level, daily/weekly meetings*

9.2.1 Regular meetings to review and update all levels of management should be held on either a daily or weekly basis dependent on the size and nature of the company. Some areas to be discussed include:-

- i. previous day's production target.
- ii. in line problems and equipment faults.
- iii. number of complaints received.
- iv. rejected raw materials.
- v. damaged or returned goods.
- vi. product development programme.
- vii. pre-production trials.

By discussing these areas, all levels of management will be fully aware of the company's activities and progress, and will in turn be able to brief their own departments on relevant information.

9.2.2 Communication to production level is essential to ensure consistent quality products and to involve on line operatives when corrective action is required.

9.2.3 This two-way communication should give evidence that there is sufficient properly trained production staff to ensure that all quality criteria are met.

9.3 *Internal audits carried out*

9.3.1 Whether conducted as an integral part of quality system accreditation, or in response to a specific requirement by a major retailer, internal auditing should be carried out to identify strengths and weaknesses in the operating system and to clarify appropriate corrective actions.

9.3.2 Managers must not be allowed to audit their own department. If the internal audit of the factory is being carried out by a qualified member of the technical team, then a production or other designated manager should audit the technical department. By this method the audit remains objective rather than subjective.

9.3.3 The audit and review of the production process to ensure the safe, and legal production of products to an agreed specification, must be part of the ongoing, specific responsibility of all management.

9.4 *Hygiene management - responsible to, qualifications*

9.4.1 It is recommended that the hygiene management should be responsible to Quality Management Team, who in turn must be fully accountable for the hygiene standards of the equipment and factory premises.

9.4.2 Hygiene management should be a controlled, organised system, effectively completing a daily programme of duties which have been prioritised in liaison with the Quality Management Department.

9.4.3 Managers specifically responsible for the areas such as hygiene must be adequately trained and qualified. They must possess a degree of organisational, people management and time management skills and must report directly to a senior manager (Quality Manager).

9.5 *Hygiene team adequate and trained*

9.5.1 Compatible with the size and type of company a hygiene team should be available to cover all departments whether on a split shift or single shift system.

9.5.2 The hygiene team should be appropriately trained in the use of cleaning chemicals, dispensing equipment, cleaning schedules and safety precautions.

9.5.3 It is recommended that all hygiene staff should have undertaken basic hygiene training, matching their level of responsibility .

interest and involvement in hygiene and quality

9.6.1 Management at all levels must demonstrate a commitment to producing safe, legal products of the specified quality. Specialist expertise must be available in all departments to achieve this.

9.6.2 Departmental managers responsibilities, with regard to hygiene and quality must be clearly defined and understood. They must be fully conversant with the principles of good manufacturing practice and be able to demonstrate and communicate them to their staff. Their commitment to GMP must never be in doubt.

9.6.3 Recommended that key management and supervisory positions must have designated deputies to cover for absence and ensure that the standards are maintained.

9.7 *Reporting and corrective procedures*

9.7.1 All reports issued as a result of, for example, an internal audit, hygiene surveys, line stoppage or customer complaint must include a programme of corrective action within an agreed Timeframe.

9.7.2 According to the priority of the corrective action in relation to product safety, lead times should be given and named managers listed in the corrective action programme.

9.7.3 It is essential that a specific manager is designated the task of checking that all corrective actions have been completed on time by the appropriate personnel.

9.8 ***Hygiene qualifications of production management***

9.8.1 It is recommended that all production supervisor / junior managers should be trained to at least a basic food hygiene qualification (1 day). Senior and middle production management should have gained advanced food hygiene qualification (5 days).

9.9 ***Clear definition of responsibility***

9.9.1 A major responsibility of managers is to ensure compliance with all appropriate legislation.

9.9.2 It is recommended that Personnel at all levels throughout the organisation should have a job description which explains their duties and responsibilities. Management level require a more detailed job description which includes their specific tasks, reporting procedures and any specific safety requirements.

9.9.3 Persons allocated responsible positions should have sufficient authority to discharge their responsibilities effectively. In particular, the Quality Assurance manager must have the authority to accept or reject raw materials, packaging materials or finished product that are out of specification.

9.9.4 The Production Manager and Quality Assurance Manager, should be two different persons, who are responsible to their direct senior. They must not be responsible to each other, but must collaborate to achieve the agreed quality specification.

9.10 ***Attitude and response to audit***

9.9.1 The attitude and response to this and other audits should be enthusiastic, committed and pro-active. Corrective actions sought in the form of agreed changes or improvements must be completed in the agreed time scales.