

GUIDELINES FOR IMPLEMENTING GMP IN FOOD PROCESSING

Personnel Standards

4.1 *Staff training programme including records*

4.1.1 All employees should be informed in writing of their legal obligations and the company's policy on personal hygiene prior to commencing work, with periodic updates as necessary. It is recommended that a standard induction course explaining the relevant legislation is designed and used by all QA managers for new staff.

Auditor's Recommendations:

Look At:	Look For:
Company Training Policy	Training Records Identification of Roles and Responsibility Training Frequency (Refresher courses)

4.1.2 It is recommended that all personnel be appropriately trained in food hygiene disciplines, relevant to the job they do. This training should encompass the requirements of personal hygiene, the reasons why they are so important and an explanation that they are a requirement.

Auditor's Recommendations:

Look At:	Look For:
Hygiene Training	Records of training

4.1.3 Additionally 'on the job' training should be given to staff in order that they fully understand their responsibilities and the need to follow written instructions and procedures. Particular attention should be given here to overcoming language barriers and illiteracy problems.

Auditor's Recommendations:

Look At:	Look For:
Hygiene Training	Responsibilities and roles Awareness and Understanding of Operational Teams

4.1.4 All Production and Quality Assurance personnel must be fully trained in the principles of Good Manufacturing Practice and comprehend the tasks assigned to them. All other personnel, including engineers, service and cleaning staff whose duties take them into the factory should also receive appropriate training.

Auditor's Recommendations:

Look At:	Look For:
Hygiene Programme HACCP System	Training and awareness of staff to understand the principles with relevant training linked to the degree of responsibility and their role

4.1.5 Training records should be kept on each individual member of staff and the effectiveness of training monitored to confirm that designated procedures are being followed.

Auditor's Recommendations:

Look At:	Look For:
Training Records	Training Schedule Level of experience and/or qualification

4.1.6 In the event of termination of employment, due consideration should be given to potential risk to the product and demonstrations of other operatives. Having earlier defined the employees legal obligations, any appropriate precaution should be taken as necessary.

Auditor's Recommendations:

Look At:	Look For:

4.2 Head coverings, earrings, jewellery, and watches

4.2.1 Suitable hair retaining wear, must be worn by all personnel in open food areas, including production staff, engineers, management and other casual site visitors.

Auditor's Recommendations:

Look At:	Look For:
Personal Hygiene	Compliance with basic food safety principles

4.2.2 Whatever style of hat is chosen, it is best, especially for long hair, if hairnets are used first. These should be brightly coloured, not brown, so that they can be easily seen. Blue is usually the colour chosen because it is not a food colour.

Auditor's Recommendations:

Look At:	Look For:
Personal Hygiene	Compliance with basic food safety principles

4.2.3 The headwear provided must retain all hair, however, hairgrips or metal clips to hold headgear in position must not be allowed. Headwear must be of generous size and comfortable.

Auditor's Recommendations:

Look At:	Look For:
Foreign Body Contamination Personal Hygiene	Compliance with basic food safety principles Records of foreign body contamination, non-conformance and corrective action Records and details of preventative measures

4.2.4 Personnel working in, or entering food processing or packing areas must not wear any jewellery. Wrist watches, ear rings, necklaces and bangles are not permissible.

Auditor's Recommendations:

Look At:	Look For:
Foreign Body Contamination Personal Hygiene	Compliance with basic food safety principles Records of foreign body contamination, non-conformance and corrective action Records and details of preventative measures

4.2.5 Nail varnish must not be worn since it presents a potential foreign body risk to the product and strong perfumes are not allowed because of the possibility of taint.

Auditor's Recommendations:

Look At:	Look For:
Foreign Body Contamination Personal Hygiene	Compliance with basic food safety principles Records of foreign body contamination, non-conformance and corrective action Records and details of preventative measures

4.2.6 It is essential that management set a good example and also abide by these personal hygiene requirements.

Auditor's Recommendations:

Look At:	Look For:
Foreign Body Contamination Personal Hygiene	Compliance with basic food safety principles Records of foreign body contamination, non-conformance and corrective action Records and details of preventative measures

4.3 ***State of overalls, design and frequency of cleaning***

4.3.1 All food handling operatives and persons who enter production areas for any reason, must be provided with clean protective clothing which must be worn at all times. This includes engineers, management and other casual visitors.

Auditor's Recommendations:

Look At:	Look For:
Personnel Hygiene	Provision of clean clothing suitable for that persons tasks Records of laundry Records of non-conformance and corrective actions

4.3.2 It is recommended that protective clothing be free of loose fastenings, such as buttons, and top pockets. Any internal pockets provided in the garment must be at hip level. When deciding which style to adopt, attention should be given to how staff will dress and undress.

Auditor's Recommendations:

Look At:	Look For:
Protective Clothing	Use of appropriate food safety clothing
Personnel Hygiene	Records of clothing and replacement Changing Procedure issued to staff

4.3.3 Boiler suits are not recommended for use in food production areas since during the changing regime, a large proportion falls onto the floor creating a potential contamination risk.

Auditor's Recommendations:

Look At:	Look For:
Protective Clothing	Use of appropriate food safety clothing
Personnel Hygiene	Records of clothing and replacement Changing Procedure issued to staff

4.3.4 Items of personal clothing (such as bodywarmers) must not be worn over protective clothing, and undergarments must not protrude below sleeves and cuffs.

Auditor's Recommendations:

Look At:	Look For:
Protective Clothing	Use of appropriate food safety clothing
Personnel Hygiene	Records of clothing and replacement Changing Procedure issued to staff Protective clothing only worn in factory

4.3.5 Protective foot wear must be provided and a suitable facility to clean it.

Auditor's Recommendations:

Look At:	Look For:
Protective Clothing	Use of appropriate footwear to meet safety requirements Provision of suitable boot cleaning facilities to reduce contamination

4.3.6 Unless authorised, protective clothing and designated foot wear must not be worn by staff outside the factory, going to or from work or taking breaks outside, (exceptions: forklift truck drivers and external process workers). Additionally, staff must not be allowed to take protective clothing from the premises.

Auditor's Recommendations:

Look At:	Look For:
Protective Clothing	Use of appropriate clothing to meet safety requirements Provision of suitable boot cleaning facilities to reduce likelihood of cross-contamination

4.3.7 Where ear plugs or ear muffs are provided because of production noise levels, all such issues must be accounted for at the end of each shift.

Auditor's Recommendations:

Look At:	Look For:
Protective Clothing	Use of appropriate equipment to meet safety requirements

4.3.8 It is a management responsibility to ensure that an adequate supply of laundered protective clothing is available, and that the laundry standards are high. Fraying edges and tears must be professionally repaired, or the garment replaced to minimise the potential foreign body risk.

Auditor's Recommendations:

Look At:	Look For:
Protective Clothing	Laundry procedure Repair of non-conforming protective clothing

4.3.9 The changing frequency of newly laundered work wear, will ultimately be dependent on the type of products being manufactured. A twice-weekly change of overalls/hats is recommended unless the job in hand is a particularly dirty operation, when a more frequent change will be needed.

Auditor's Recommendations:

Look At:	Look For:
Protective Clothing	Frequency of new clothing / change Records of non-conformance and corrective actions

4.3.10 Colour coding of protective work wear is essential in high risk or multi-disciplinary sites, to identify operatives and to ensure correct changing regimes. Additionally, service operatives with a specific role e.g. engineers, cleaners, distribution personnel, should be easily recognisable.

Auditor's Recommendations:

Look At:	Look For:
Protective Clothing Identification and Traceability	Access to suitable protective clothing for process discipline Colour coding and identification of significant staff members for segregation or responsibility

4.3.11 Where the services of a contract laundry are commissioned their premises must be vetted to ensure that standards are acceptable, and that cross contamination of cleaned overalls is not possible. Adequate separation of food handlers protective clothing from other contracts (e.g. hospitals or pharmaceutical industries) must be in place. Indeed, laundries with specific food processing units should be sought.

Auditor's Recommendations:

Look At:	Look For:
Contract Review	Laundry service complies with minimum factory requirement

4.3.12 The hygienic transfer of overalls from laundry to food premises by distribution vehicles is essential. Provision must be made to protect the overalls from contamination and the vehicles must be suitably cleaned. 'Shrouding' of high risk overalls in plastic film sleeves is very advantageous to ensure clean handling practices prior to use.

Auditor's Recommendations:

Look At:	Look For:

4.4 **Handwashing disciplines, 'hands free sink', hand swabs**

4.4.1 Provision must be made to ensure that hands are kept clean and washed at frequent intervals, preferably in 'warm' water, using a non-perfumed bactericidal soap. Hands should be thoroughly dried, nails kept short and well manicured and cleaned by using a nailbrush. Where appropriate, non-perfumed barrier creams or alcohol based skin sanitisers should be provided.

Hands must be washed:-

- i. immediately before putting on protective clothing, particularly important in the case of high risk personnel.
- ii. immediately before commencing work, or entering production areas.
- iii. after handling debris, refuse or food waste.
- iv. if they become soiled or visibly contaminated.
- v. after visiting the toilet.
- vi. after blowing the nose or touching the mouth.

Auditor's Recommendations:

Look At:	Look For:
Personal Hygiene	Training Records Personal Hygiene Policy

4.4.2 Sufficient hand-wash stations must be provided in toilet areas and at each entrance to the production area for the number of staff employed on site.

Auditor's Recommendations:

Look At:	Look For:
Personal Hygiene	Position and cleanliness of hand wash stations

4.4.3 To ensure good handwashing disciplines, operatives should be channelled past the hand-wash stations by the use of guardrails or other appropriate measures.

Auditor's Recommendations:

Look At:	Look For:
Personal Hygiene Factory Plan	Position and location of handwash facilities ensure use by all personnel

4.4.4 Similar handwashing facilities should be provided at designated places within the food processing area to encourage good personal hygiene disciplines.

Auditor's Recommendations:

Look At:	Look For:
Personal Hygiene Factory Plan	Position and location of handwash facilities ensure use by all personnel

4.4.5 "Hands free" knee, elbow or electronically operated sink units are required, with a good supply of potable running water water. Hand operated taps and ceramic sinks should be avoided because of their potential contamination risk.

Auditor's Recommendations:

Look At:	Look For:
Handwash System Design	Compliance to food safety requirements

4.4.6 Adequate drying facilities must be provided e.g disposable paper towels . Open bins or foot operated lidded bins must be provided at all hand-wash facilities for the disposal of sanitary waste.

Auditor's Recommendations:

Look At:	Look For:
Handwash System Design	Compliance to food safety requirements

4.4.7 Hand-wash sinks and drying facilities must not be used for utensil or general cleaning purposes.

Auditor's Recommendations:

Look At:	Look For:
Handwash System Design	Compliance to food safety requirements Separate utensil washing facilities available.

4.4.8 Notices reminding staff of the handwashing requirements must be posted in each toilet, and by the urinal area, in break/canteen areas, at the hand wash sinks, and on every entrance door to the production areas.

Auditor's Recommendations:

Look At:	Look For:
Personal Hygiene	Training Records Personal Hygiene Policy

4.4.9 The effectiveness of the handwashing disciplines should be monitored by the random implementation of hand swabs or contact plates. Suitable growth medium for Total Viable counts, Coliform counts and *Staphylococcus aureus* must be readily prepared and the swabs transferred as quickly as possible. For demonstration purposes during food hygiene training, swabs should be taken before and after the hand washing regime.

Auditor's Recommendations:

Look At:	Look For:
Personal Hygiene	Training Records Personal Hygiene Policy Test Records and frequency

4.4.10 Where it is company policy to adopt the use of disposable colour coded gloves, in production areas, these gloves must be treated as a 'second skin', and regularly washed and changed. If they become damaged or torn, they must be removed because of the potential foreign body hazard.

Auditor's Recommendations:

Look At:	Look For:
Protective Clothing	Use of disposable equipment / gloves / clothing Ensure cleanliness and replacement upon damage Records of non-conformance and factory checks

4.5 Dressings/First Aid - blue metal detectable

4.4.1 No person having untreated sores, cuts or grazes should be allowed to work in contact with foods. All such injuries must be reported and suitably treated (by a trained nurse or first aider).

Auditor's Recommendations:

Look At:	Look For:
Medical Screening	Medical Policy Medical Procedure for illness Medical Screening policy for infectious / transmitted diseases

4.4.2 Currently all cuts/ abrasions and sores on the hands are covered with a plaster and the hand covered with disposable glove. It is recommended that all cuts, sores or abrasions on the skin must be covered, after treatment, with a conspicuously coloured (blue) waterproof dressing. Such dressings must be accounted for at the end of each shift, and must be renewed before the start of each shift. It is preferable that such persons affected should not work on open food.

Auditor's Recommendations:

Look At:	Look For:
Medical Screening	Medical Policy Medical Procedure for illness Medical Screening policy for infectious / transmitted diseases Accident Log book and first aid equipment

4.6 Pre-employment health checks - annual medical, holiday return

4.6.1 All company employees must be required to complete an appropriate examination and medical questionnaire, prior to commencing work. This applies to production/quality assurance staff, management, engineers, cleaners, office staff and any other permanent/temporary, full time or part time staff.

Auditor's Recommendations:

Look At:	Look For:
Medical Screening	Records of personal health status with verification by an appointed person

4.6.2 Persons directly involved in food processing or packing should be fit and capable of discharging their duties effectively.

Auditor's Recommendations:

Look At:	Look For:
Medical Screening	Health and fitness of employees ensures safe food practices

4.6.3 Persons suffering from any infectious illness (particularly gastro-intestinal disorders, vomiting, diarrhoea etc...) must not be permitted to work in contact with food or other food handlers. Additionally, operatives with skin infections, nasal or ear disorders should not be allowed to handle open food.

Auditor's Recommendations:

Look At:	Look For:
Medical Screening	Medical Policy Medical Procedure for illness Medical Screening policy for infectious / transmitted diseases Accident Log book and first aid equipment

4.6.4 Any person suffering from infectious illness must be declared medically fit by their doctor before being allowed to return to work. Full records must be kept for each individual case.

Auditor's Recommendations:

Look At:	Look For:
Medical Screening	Medical Policy Medical Procedure for illness Medical Screening policy for infectious / transmitted diseases Accident Log book and first aid equipment

4.6.5 On returning from holidays all employees must report any food poisoning symptoms they have had during their holiday and must be medically screened by a doctor prior to returning to work. Screening should include the faecal testing for pathogenic, food poisoning bacteria e.g. Salmonella, Staphylococcus aureus, etc.

Auditor's Recommendations:

Look At:	Look For:
Medical Screening	Medical Policy Medical Procedure for illness Medical Screening policy for infectious / transmitted diseases Accident Log book and first aid equipment

4.6.6 Bi-annual medical for all employees should be undertaken by the company to ensure that operatives are healthy and capable of discharging their duties efficiently.

Auditor's Recommendations:

Look At:	Look For:
Medical Screening	Medical Policy Medical Procedure for illness Medical Screening policy for infectious / transmitted diseases Accident Log book and first aid equipment

4.7 Screening/questionnaire for visitors

4.7.1 There must be adequate screening of all visitors to the factory must occur. On arrival, they must report to reception, sign the visitors book and complete a detailed questionnaire. The information required should include:-

- i. Name, company, date of visit, who visiting.
- ii. Purpose of visit (which departments, individual).
- iii. Other food premises visited within previous 72 hours (high risk factories only).
- iv. Whether they have been stool tested for salmonella (high risk factories only).
- v. If they have recently be abroad, if so where?

If the information provided gives cause for alarm, then following further investigation, accesses to the factory should be declined, and an alternative appointment made.

Auditor's Recommendations:

Look At:	Look For:
Medical Screening	Medical Policy Medical Procedure for illness Medical Screening policy for infectious / transmitted diseases Accident Log book and first aid equipment

4.8 Adequate medical facilities

4.8.1 The company must provide the services of a fully trained nurse or first aider and a medical room with adequate equipment for the first aid treatment of illness or injury.

Auditor's Recommendations:

Look At:	Look For:
Medical Screening	Medical Policy Medical Procedure for illness Medical Screening policy for infectious / transmitted diseases Accident Log book and first aid equipment Provision of suitably trained staff

4.8.2 First aid equipment must be kept securely and issued only by trained staff.

Auditor's Recommendations:

Look At:	Look For:
Medical Screening	Medical Policy Medical Procedure for illness Medical Screening policy for infectious / transmitted diseases Accident Log book and first aid equipment Provision of suitably trained staff

4.8.3 All treatments must be fully recorded in the medical record book provided, with the patient's name, date, disease and the medical supplies issued.

Auditor's Recommendations:

Look At:	Look For:
Medical Screening	Medical Policy Medical Procedure for illness Medical Screening policy for infectious / transmitted diseases Accident Log book and first aid equipment Provision of suitably trained staff

4.9 Control of smoking, food and drink

4.9.1 Smoking and the use of tobacco must only be allowed in properly designated areas e.g. canteen, rest rooms and offices. It is not permitted in production areas or toilets. Smoking utensils must not be carried in pockets in production areas. Facilities for the disposal of smoking materials must be provided at exits from smoking areas.

Auditor's Recommendations:

Look At:	Look For:
Personal / Factory Hygiene	No smoking policy Provision for smoking is given on the factory plan / layout

4.9.2 The company may decide at its own discretion, to make the whole production site a "No Smoking" zone. This is perfectly acceptable but new employees should be informed at recruitment and established staff notified of the company's decision in writing. This would then be incorporated into the Code of Practice for Personal Hygiene.

Auditor's Recommendations:

Look At:	Look For:
Personal / Factory Hygiene	No smoking policy Personal Hygiene Practice

4.9.3 Eating and drinking must only be allowed in properly designated areas. Eating sweets, chewing gum or other food stuffs must be strictly forbidden in all production areas and toilet facilities.

Auditor's Recommendations:

Look At:	Look For:
Factory Hygiene / Staff Facilities	Dining facilities separate from the production areas (Factory Plan) Personal Hygiene policy Food Safety Policy

4.9.4 Operatives must not be allowed to take their breaks or meals outside the building, without first removing their protective clothing.

Auditor's Recommendations:

Look At:	Look For:
Personal Hygiene Staff Facilities	Provision of dining and rest rooms for staff – Factory Plan Protective clothing procedures

4.9.5 Hands must be washed after eating.

Auditor's Recommendations:

Look At:	Look For:
Personal Hygiene	Use of good personal hygiene practices

4.9.6 Where drinking is permitted, a drinking fountain is the preferred source of supply, as it is easily controlled, clean and tidy.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Provision of suitable drinking water supply for staff separated from production supply

4.10 Staff facilities - lockers, canteen, toilets, change areas

- 4.10.1 Adequate lockers must be provided for all personnel for the safe storage of personnel effects such as outdoor clothing, bags, etc. This will eliminate the risk of them being brought into production areas (which is forbidden). Lockers should be easily cleaned and, if possible, designed with a sloping top to prevent dust harbourage and use as a shelf.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Factory layout Separated Changing rooms and toilets and use

- 4.10.2 A separate canteen or rest room area must be provided for operatives to take their meals and breaks. Refreshments must not be taken into production areas. It is recommended that overalls be removed prior to using these areas.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Factory Plan – provision of separated factory facilities

- 4.10.3 Canteen facilities, particularly the food preparation areas must be of good design, have adequate storage and chilling facilities and be well run and maintained by appropriate staff.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Factory plan and design specifications Maintained and operated by suitably trained staff (if applicable)

- 4.10.4 Automatic drink dispensers can be acceptable, provided that they are suitably located, adequately cleaned and maintained. Disposal facilities for non-breakable empty drinking containers must be provided. Plastic beakers or cups must not be taken away from the vicinity of the drinks dispenser.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Provision of suitable equipment for the staff is not mandatory, but were it is installed, ensure suitable facilities exist to ensure maintenance of clean and maintained environment

4.10.5 Rest areas must be kept in good decorative order, properly maintained and cleaned, and should provide adequate seating facilities to meet the maximum usage.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Factory Layout Provision of suitable safe and hygienic facilities

4.10.6 Where canteen and rest room facilities are being shared, between high and low risk operatives, all operatives must remove protective clothing before entering the area.

Auditor's Recommendations:

Look At:	Look For:
Personal Hygiene Staff Facilities	Staff Hygiene Removal of protective clothing

4.10.8 Canteen and rest room areas must exercise preventative pest control systems consistent with those adopted in other areas of the factory.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Housekeeping Practices implemented Records for pest control

4.10.10 Separate male and female toilets must be provided which are adequate for the number of employees on site and comply at least to the minimum requirements of the Public Health Act.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Provision of suitable toilets for male and female staff with washing facilities and maintenance Factory layout and design Separated from the production areas

4.10.10 In high risk processes or sensitive environments, separate facilities may be required for different groups of operatives. Operatives should remove their overalls prior to using the toilet.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities Factory Design	Separate toilet facilities from production facilities

4.10.11 All toilets must be adequately lit and ventilated and separated from production areas by an ante-room supplied with handwashing facilities.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Provision of suitable lighting Separated from production areas and changing facilities Supply of handwashing facilities

4.10.12 Toilet areas must be of good hygienic design and the floors, walls, ceiling and sanitary equipment must be clean and in good decorative order.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Provision of suitable lighting Separated from production areas and changing facilities Supply of handwashing facilities Hygienic Design and layout

4.10.13 Adequate changing facilities must be provided for operatives to facilitate changing into protective clothing prior to entering the processing areas.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Suitable facilities to allow high and / or low risk changing Provision of suitable lighting Separated from high and low risk production areas Supply of handwashing facilities Hygienic Design and layout

4.10.14 Separate storage must be provided for outdoor clothes and foot wear and the storage of protective clothing to prevent the risk of cross contamination.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities Protective Clothing Factory Layout	Provision of locker rooms for outdoor clothing Provision of lockers for storage of factory protective clothing

4.10.15 Changing rooms must be kept in good decorative order, maintained to a hygienic standard and exercise pest control measures.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Provision of hygiene cleaning with records Pest Control Records

4.10.16 Changing facilities must not be used for eating, drinking or smoking.

Auditor's Recommendations:

Look At:	Look For:
Staff Facilities	Changing facilities provided only for changing clothing