

bsi.

● Improving  
unannounced  
audit results



# ● Introduction



The intent of unannounced audits is to determine the actual operational and hygiene controls in place on day-to-day basis, which reflect the behavioural and food safety cultures within the organization. Being audit-ready at all times builds trust and confidence that a facility could be visited at any time.

Unannounced audits are viewed in one of two ways; an opportunity to demonstrate consistently high standards of food safety compliance across fundamental systems and hygiene practices (control of allergens, foreign matter and labelling); or they're seen as a risk that compliance inconsistencies will be exposed.



With the exception of regulatory audits and second-party supplier audits, the option of unannounced food safety audits wasn't widely used in the food industry prior to the introduction of GFSI schemes which require an unannounced audit every three years.

In most cases, sites can indicate periods of time when unannounced audits can't be conducted. Suitable reasons for blackout periods include non-production periods and seasonal production but exclude high-volume production periods and the absence of key staff to ensure the integrity of the process.

Sites that find unannounced audits more challenging are those that need to react with urgency to correct hygiene and housekeeping to address problems that are already known to the organization. When compliance systems become reliant on only a few people in an organization to identify, address and monitor issues, there's the possibility that things are forgotten, time runs out or that other issues are prioritized in the dynamic work environment.

The real challenge to being audit-ready every day is creating a consistent culture of engagement where all employees proactively identify, address and monitor food safety issues so that compliance is a habit and not something that is done in the lead up to an external audit.



# ● Preparing for unannounced audits



Global BSI audit data reveals that unannounced audit findings indicate that practices and behaviours, rather than systems, are the issue. It's assumed that there will be an element of surprise in an unannounced audit, so to ensure the integrity of the unannounced audit process, the auditor needs to progress from the opening meeting to an inspection of the production areas as soon as practicable. This puts the audit focus on process control, hygiene and housekeeping standards.

Most auditors expect past announced audits reflect the highest standard of hygiene and housekeeping that a site is capable of achieving, so any hygiene and housekeeping issues observed (even relatively minor issues) are typically raised as an audit finding on the basis that the site is the best it's going to be until the next audit.

## Cleaning

- Build-up of waste, organic or food residues in and around processing equipment, and in areas that are difficult to access such as floors, drains and overhead walkways
- Operator workstations cluttered with unnecessary and non-compliant items
- Lack of cleanliness or suitability of cleaning equipment
- Unsuitable cleaning chemicals, lack of secure storage for cleaning chemicals and unlabelled bottles used for decanted cleaning solutions

## Waste

- Insufficient frequency of removal for internal and external waste
- Waste receptacles intended to be captive removed from the area
- Lack of controls in the handling of waste designated for animal feed or by-products

### Pest control

- Evidence of rodent, cockroach, flying insect or ant activity in storage and production areas

### Maintenance

- Temporary repairs not identified as temporary and/or overdue for permanent repair
- Unclean and/or unsuitable tools used in production areas
- Additional tools/items not indicated on permitted items registers

### External areas

- Overgrown vegetation and litter
- Smokers' waste not effectively contained in designated smoking areas
- Site security not effectively maintained

### Personal hygiene standards

- Incorrect use or disposal of PPE, non-compliance to dress up and dress down protocols or uniform protocols for the removal of uniforms when using canteen or toilet facilities
- Lack of compliance to hand washing protocols on entry to production and inadequate frequency of hand washing during production activities

### Traceability

- Unidentified ingredients in weigh-up, work-in-progress and rework

Although the primary focus of an unannounced audit is on hygiene and housekeeping, food safety management system documents and records are also assessed. Examples include:

- Incomplete records on the day of audit: CCP monitoring, preoperative checks, product traceability and hold
- Internal audits aren't completed as scheduled
- Customer complaints and corrective actions aren't actioned or closed in the allocated timeframe





# ● Examine and resolve gaps

1. **Repeat issues:** identical issues raised over a number of internal or external audits are likely to be the same issues that will be reviewed in an unannounced audit.
2. **Root cause analysis:** analyse repeat issues, no matter how big or small, to identify all causes contributing to an issue. This process may need to be repeated several times to uncover all the underlying causes, with a systematic approach required to remove causes based on risk priority.
3. **Define ownership of all areas:** use a site map to cross-check all areas and ensure a person or team has responsibility for each area. Pay particular attention to external areas, temporary storage areas and any area undergoing building construction works.
4. **Consistent compliance:** consider if there are different standards food safety compliance across operating conditions for different days and shifts of operation, different product runs and at low and peak production times. This will help prioritize where the product and people safety compliance or quality function of an organization needs to focus efforts to improve compliance.
5. **Communicate expectations:** ensure acceptable hygiene and housekeeping standards are understood consistently across the organization. Ideally, a series of photos ranging from the acceptable standard or 'what good looks like', to marginal and unacceptable hygiene and housekeeping provide a clear visual prompt to everyone working in an area. This avoids confusion over differences of opinion as to the required standard.
6. **Recognition and reward:** introduce a programme to encourage employees to put in extra effort to achieve and maintain high standards of hygiene and housekeeping. This can also enhance your safety culture by recognizing and rewarding positive behaviours.
7. **Challenge practices and systems:** ask 'Did that correction prevent recurrence?' or 'By fixing X have we created a problem with Y'? For example, by changing the area where batched ingredients are stored to remove congestion in a weigh-up room, has this created a cleaning accessibility issue in the new area used for storage?
8. **'Mock' unannounced audits:** assessing the audit criteria is useful to determine a site's current compliance. Issues identified in the mock audit should be rectified with root cause analysis applied to identify all underlying causes that require correction to prevent recurrence. And, without the auditor present, this can be an effective technique to foster employee confidence in contributing to the audit process.



# ● Sustainable food safety compliance

Sustainable compliance is the actualization of Aristotle's wise words, 'We are what we repeatedly do. Excellence is not an act, but a habit.'

Unannounced audits, and the way that people behave during unannounced audits, provide important clues to the product and people safety culture of an organization. If the underlying culture is that 'quality owns compliance' then it's a challenge to move beyond the point-in-time unannounced audit result. Every organization will have an underlying product and people safety culture. Knowing what your culture is and where you need to instigate a change will provide long-term, sustainable food safety compliance.

The key reason for repeat compliance issues, especially those relating to hygiene and housekeeping is that the immediate correction applied doesn't address the underlying causes for the issue. An example being the addition of yet another 'check' to the hygiene and housekeeping (Good Manufacturing Processes/GMP) inspection criteria rather than engaging employees to understand what the issue is, how to best correct the issue and why it's important to prevent the issue in the future.

Food safety compliance standards achieved on the day of an announced audit and those maintained for day-to-day operations need to be consistent to provide a benchmark of acceptable standards as different standards permitted by senior management provide a conflicting message to employees.



Prioritizing food safety culture will be the most effective tool to continually build compliance to shift from 'basic' to 'best practice' and to provide the confidence that the organization is ready for an audit, any day and every day.

# ● Why BSI?



BSI believes the world should be supplied with safe, sustainable and socially responsible food. We offer a broad range of certification and risk management services to help all organizations improve performance.

Our solutions for the food sector include certification, training, assessment, supply chain software and capacity-building services, to enable food organizations to build trust and resilience in:

- Food quality and safety
- Environmental sustainability
- Occupational health, safety and well-being
- Information security

Talk to us about food safety management:  
E: [bsi.za@bsigroup.com](mailto:bsi.za@bsigroup.com)

