

BRC Global Standard Food Issue 8

DATE	DEPARTMENT

# INTERNAL AUDIT CHECKLIST

1	Senior management commitment		
1.1	Senior management commitment and continual improvement		
<b>Fundamental SOI</b>	The site's senior management shall demonstrate they are fully committed to the implementation of the requirements of the Global Standard for Food Safety and to processes which facilitate continual improvement of food safety and quality management.		
<b>Clause</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
1.1.1	<p>The site shall have a documented policy which states the site's intention to meet its obligation to produce safe, legal and authentic products to the specified quality, and its responsibility to its customers. This shall be:</p> <ul style="list-style-type: none"> <li>signed by the person with overall responsibility for the site</li> <li>communicated to all staff.</li> </ul>	Food Safety and Quality Policy	
1.1.2	<p>The site's senior management shall define and maintain a clear plan for the development and continuing improvement of a food safety and quality culture. This shall include:</p> <ul style="list-style-type: none"> <li>defined activities involving all sections of the site that have an impact on product safety</li> <li>an action plan indicating how the activities will be undertaken and measured, and the intended timescales</li> <li>a review of the effectiveness of completed activities.</li> </ul>	Complies	
1.1.3	The site's senior management shall ensure that clear objectives are defined to maintain and improve the safety, legality and quality of products manufactured, in accordance with the	Food Safety Objective Monitoring Every Monthly	

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	<p>food safety and quality policy and this Standard. These objectives shall be:</p> <ul style="list-style-type: none"> <li>documented and include targets or clear measures of success</li> <li>clearly communicated to relevant staff</li> <li>monitored and results reported at least quarterly to site senior management.</li> </ul>		
1.1.4	<p>Management review meetings attended by the site's senior management shall be undertaken at appropriate planned intervals, annually at a minimum, to review the site performance against the Standard and objectives set in clause 1.1.3. The review process shall include the evaluation of:</p> <ul style="list-style-type: none"> <li>previous management review action plans and timeframes</li> <li>the results of internal, second-party and/or third-party audits</li> <li>any objectives that have not been met, to understand the underlying reasons. This information shall be used when setting future objectives and to facilitate continual improvement</li> <li>any customer complaints and the results of any customer feedback</li> <li>any incidents (including both recalls and withdrawals), corrective actions, out-of-specification results and non-conforming materials</li> <li>the effectiveness of the systems for HACCP, food</li> </ul>	<p>Senior Management is Present in MRM</p>	

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	<p>defence and authenticity</p> <ul style="list-style-type: none"> <li>resource requirements.</li> </ul> <p>Records of the meeting shall be documented and used to revise the objectives. The decisions and actions agreed within the review process shall be effectively communicated to appropriate staff, and actions implemented within agreed timescales.</p>		
1.1.5	<p>The site shall have a demonstrable meeting programme which enables food safety, legality, integrity and quality issues to be brought to the attention of senior management. These meetings shall occur at least monthly.</p> <p>Employees shall be aware of the need to report any evidence of unsafe or out-of-specification product or raw materials, to a designated manager to enable the resolution of issues requiring immediate action.</p>	Complies-Monthly Meeting Every Month	
1.1.6	<p>The company shall have a confidential reporting system to enable staff to report concerns relating to product safety, integrity, quality and legality.</p> <p>The mechanism (e.g. the relevant telephone number) for reporting concerns must be clearly communicated to staff.</p> <p>The company's senior management shall have a process for assessing any concerns raised. Records of the assessment and, where appropriate, actions taken, shall be documented.</p>	Complies	

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1.1.7		The company's senior management shall provide the human and financial resources required to produce food safely and in compliance with the requirements of this Standard.	Complies	
1.1.8		<p>The company's senior management shall have a system in place to ensure that the site is kept informed of and reviews:</p> <ul style="list-style-type: none"> <li>scientific and technical developments</li> <li>industry codes of practice</li> <li>new risks to authenticity of raw materials</li> <li>all relevant legislation in the country where the product will be sold (where known).</li> </ul>	Complies	
1.1.9		The site shall have a genuine, original hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRC Global Standards website.	Complies-Standard in Electronic Form	
1.1.10		Where the site is certificated to the Standard, it shall ensure that announced recertification audits occur on or before the audit due date indicated on the certificate.	Complies	
1.1.11		The most senior production or operations manager on site shall participate in the opening and closing meetings of the audit for certification to the Standard. Relevant departmental managers or their deputies shall be available as required during the audit.	Complies	

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1.1.12		The site's senior management shall ensure that the root causes of any non-conformities against the Standard identified at the previous audit have been effectively addressed to prevent recurrence.	Complies	
1.1.13		The BRC Global Standards logo and references to certification status shall only be used in accordance with the conditions of use detailed in the audit protocol section (Part III, section 5.6) of the Standard.	Complies	
1.2	Organisational structure, responsibilities and management authority			
SOI	The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality and quality.			
Clause	Requirements	Conforms		
1.2.1	The company shall have an organisation chart demonstrating the management structure of the company. The responsibilities for the management of activities which ensure food safety, integrity, legality and quality shall be clearly allocated and understood by the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person.	Organizational Chart –		
1.2.2	The site's senior management shall ensure that all employees are aware of their responsibilities. Where documented work instructions exist for activities undertaken, the relevant employees shall have access to these and be able to demonstrate that work is carried out in accordance with the instructions.	Responsibilities and Authority		

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2	The food safety plan – HACCP		
<b>Fundamental SOI</b>	The company shall have a fully implemented and effective food safety plan incorporating the Codex Alimentarius HACCP principles.		
2.1	Senior management commitment and continual improvement		
<b>Clause</b>	<b>Requirements</b>	<b>Conforms</b>	
2.1.1	<p>The HACCP or food safety plan shall be developed and managed by a multi-disciplinary food safety team that includes those responsible for quality assurance, technical management, production operations, engineering and other relevant functions.</p> <p>The team leader shall have an in-depth knowledge of Codex HACCP principles (or equivalent) and be able to demonstrate competence, experience and training. Where there is a legal requirement for specific training, this shall be in place.</p> <p>The team members shall have specific knowledge of HACCP and relevant knowledge of products, processes and associated hazards.</p> <p>In the event of the site not having the appropriate in-house knowledge, external expertise may be used, but day-to-day management of the food safety system shall remain the responsibility of the company.</p>	HACCP TEAM	
2.1.2	The scope of each HACCP or food safety plan, including the products and processes covered, shall be defined.		
2.2	Prerequisite programmes		
<b>Clause</b>	<b>Requirements</b>	<b>Conforms</b>	
2.2.1	The site shall establish and maintain environmental and operational	HACCP Manual	

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		<p>programmes necessary to create an environment suitable to produce safe and legal food products (prerequisite programmes). As a guide these may include the following, although this is not an exhaustive list:</p> <ul style="list-style-type: none"> <li>• cleaning and sanitising</li> <li>• pest management</li> <li>• maintenance programmes for equipment and buildings</li> <li>• personal hygiene requirements</li> <li>• staff training</li> <li>• purchasing</li> <li>• transportation arrangements</li> <li>• processes to prevent cross-contamination</li> <li>• allergen controls.</li> </ul> <p>The control measures and monitoring procedures for the prerequisite programmes must be clearly documented and shall be included within the development and reviews of the HACCP or food safety plan.</p>		
<b>2.3</b>	Describe the product (equivalent to Codex Alimentarius Step 2)			
<b>Clause</b>	<b>Requirements</b>	<b>Conforms</b>		
<b>2.3.1</b>	<p>A full description for each product or group of products shall be developed, which includes all relevant information on food safety. As a guide, this may include the following, although this is not an exhaustive list:</p> <ul style="list-style-type: none"> <li>• composition (e.g. raw materials, ingredients, allergens, recipe)</li> <li>• origin of ingredients</li> <li>• physical or chemical properties that impact food safety (e.g. pH, aw)</li> <li>• treatment and processing (e.g.</li> </ul>	<b>Product Description</b>		

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	<ul style="list-style-type: none"> <li>cooking, cooling)</li> <li>• packaging system (e.g. modified atmosphere, vacuum)</li> <li>• storage and distribution conditions (e.g. chilled, ambient)</li> <li>• maximum safe shelf life under prescribed storage and usage conditions.</li> </ul>		
2.3.2	<p>All relevant information needed to conduct the hazard analysis shall be collected, maintained, documented and updated. The company will ensure that the HACCP or food safety plan is based on comprehensive information sources, which are referenced and available on request. As a guide, this may include the following, although this is not an exhaustive list:</p> <ul style="list-style-type: none"> <li>• the latest scientific literature</li> <li>• historical and known hazards associated with specific food products</li> <li>• relevant codes of practice</li> <li>• recognised guidelines</li> <li>• food safety legislation relevant for the production and sale of products</li> <li>• customer requirements.</li> </ul>	Complies	
2.4	Identify intended use (equivalent to Codex Alimentarius Step 3)		
Clause	Requirements	Conforms	
2.4.1	The intended use of the product by the customer, and any known alternative use, shall be described, defining the consumer target groups, including the suitability of the product for vulnerable groups of the population (e.g. infants, elderly, allergy sufferers).	Product Description	
2.5	Construct a process flow diagram (equivalent to Codex Alimentarius Step 4)		

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Clause		Requirements	Conforms	
2.5.1		<p>A flow diagram shall be prepared to cover each product, product category or process. This shall set out all aspects of the food process operation within the HACCP or food safety plan scope, from raw material receipt through to processing, storage and distribution. As a guide, this should include the following, although this is not an exhaustive list:</p> <ul style="list-style-type: none"> <li>• plan of premises and equipment layout</li> <li>• raw materials, including introduction of utilities and other contact materials (e.g. water, packaging)</li> <li>• sequence and interaction of all process steps</li> <li>• outsourced processes and subcontracted work</li> <li>• potential for process delay</li> <li>• rework and recycling</li> <li>• low-risk/high-risk/high-care area segregation</li> </ul> <p>finished products, intermediate/semi-processed products, by-products and waste.</p>	<p>Process Flow Chart – SC/PFC/01</p>	
2.6		Verify flow diagram (equivalent to Codex Alimentarius Step 5)		
Clause		Requirements	Conforms	
2.6.1		<p>The HACCP food safety team shall verify the accuracy of the flow diagrams by on-site audit and challenge at least annually. Daily and seasonal variations shall be considered and evaluated. Records of verified flow diagrams shall be maintained.</p>	<p>Verification done by HACCP Team and Verification Plan</p>	
2.7		List all potential hazards associated with each process step, conduct a hazard analysis and consider any measures to control identified hazards (equivalent to Codex Alimentarius Step 6,		

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Principle 1)			
Clause	Requirements	Conforms	
2.7.1	<p>The HACCP food safety team shall identify and record all the potential hazards that are reasonably expected to occur at each step in relation to product, process and facilities. This shall include hazards present in raw materials, those introduced during the process or surviving the process steps, and consideration of the following types of hazard:</p> <ul style="list-style-type: none"> <li>• microbiological</li> <li>• physical contamination</li> <li>• chemical and radiological contamination</li> <li>• fraud (e.g. substitution or deliberate/intentional adulteration)</li> <li>• malicious contamination of products</li> <li>• allergen risks (see clause 5.3).</li> </ul> <p>It shall also take account of the preceding and following steps in the process chain.</p>	Complies	
2.7.2	<p>The HACCP food safety team shall conduct a hazard analysis to identify hazards which need to be prevented, eliminated or reduced to acceptable levels. Consideration shall be given to the following:</p> <ul style="list-style-type: none"> <li>• likely occurrence of hazard</li> <li>• severity of the effects on consumer safety</li> <li>• vulnerability of those exposed</li> <li>• survival and multiplication of micro-organisms of specific concern to the product</li> <li>• presence or production of toxins, chemicals or foreign bodies</li> <li>• contamination of raw materials,</li> </ul>	Complies	

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	<p>intermediate/semi-processed product, or finished product.</p> <p>Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined and documented.</p>		
2.7.3	<p>The HACCP food safety team shall consider the control measures necessary to prevent or eliminate a food safety hazard or reduce it to an acceptable level. Where the control is achieved through existing prerequisite programmes, this shall be stated and the adequacy of the programme to control the specific hazard validated. Consideration may be given to using more than one control measure.</p>	Complies	
2.8	Determine the critical control points (CCPs) (equivalent to Codex Alimentarius Step 7, Principle 2)		
Clause	Requirements	Conforms	
2.8.1	<p>For each hazard that requires control, control points shall be reviewed to identify those that are critical. This requires a logical approach and may be facilitated by use of a decision tree. Critical control points (CCPs) shall be those control points which are required in order to prevent or eliminate a food safety hazard or reduce it to an acceptable level. If a hazard is identified at a step where control is necessary for safety but the control does not exist, the product or process shall be modified at that step, or at an earlier step, to provide a control measure.</p>	Complies	
2.9	Establish critical limits for each CCP (equivalent to Codes Alimentarius Step 8, Principle 3)		
Clause	Requirements	Conforms	
2.9.1	<p>For each CCP, the appropriate critical limits shall be defined in order to identify clearly whether the process is</p>	Complies	

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	in or out of control. Critical limits shall be:		
	<ul style="list-style-type: none"> <li>measurable wherever possible (e.g. time, temperature, pH)</li> <li>supported by clear guidance or examples where measures are subjective (e.g. photographs).</li> </ul>		
2.9.2	The HACCP food safety team shall validate each CCP. Documented evidence shall show that the control measures selected and critical limits identified are capable of consistently controlling the hazard to the specified acceptable level.	NA	
2.10	Establish a monitoring system for each CCP (equivalent to Codex Alimentarius Step 9, Principle 4)		
Clause	Requirements	Conforms	
2.10.1	<p>A monitoring procedure shall be established for each CCP to ensure compliance with critical limits. The monitoring system shall be able to detect loss of control of CCPs and, wherever possible, provide information in time for corrective action to be taken. As a guide, consideration may be given to the following, although this is not an exhaustive list:</p> <ul style="list-style-type: none"> <li>online measurement</li> <li>offline measurement</li> <li>continuous measurement (e.g. thermographs, pH meters etc.).</li> </ul> <p>Where discontinuous measurement is used, the system shall ensure that the sample taken is representative of the batch of product.</p>	Complies	
2.10.2	Records associated with the monitoring of each CCP shall include the date, time and result of measurement and shall be signed by	Complies	

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	the person responsible for the monitoring and verified, when appropriate, by an authorised person. Where records are in electronic form, there shall be evidence that records have been checked and verified.		
<b>2.11</b>	Establish a corrective action plan (equivalent to Codex Alimentarius Step 10, Principle 5)		
<b>Clause</b>	<b>Requirements</b>	<b>Conforms</b>	
<b>2.11.1</b>	The HACCP food safety team shall specify and document the corrective action to be taken when monitored results indicate a failure to meet a control limit, or when monitored results indicate a trend towards loss of control. This shall include the action to be taken by nominated personnel with regard to any products that have been manufactured during the period when the process was out of control.	<b>Complies</b>	
<b>2.12</b>	Establish verification procedures (equivalent to Codex Alimentarius Step 11, Principle 6)		
<b>Clause</b>	<b>Requirements</b>	<b>Conforms</b>	
<b>2.12.1</b>	<p>Procedures of verification shall be established to confirm that the HACCP or food safety plan, including controls managed by prerequisite programmes, continues to be effective. Examples of verification activities include:</p> <ul style="list-style-type: none"> <li>• internal audits</li> <li>• review of records where acceptable limits have been exceeded</li> <li>• review of complaints by enforcement authorities or customers</li> <li>• review of incidents of product withdrawal or recall.</li> </ul> <p>Results of verification shall be recorded and communicated to the HACCP food safety team.</p>	<p><b>NA</b></p> <p><b>Complain Handling Procedure and Recall Procedure</b></p>	

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<b>2.13</b>	HACCP documentation and record-keeping (equivalent to Codex Alimentarius Step 12, Principle 7)		
<b>Clause</b>	<b>Requirements</b>	<b>Conforms</b>	
<b>2.13.1</b>	Documentation and record-keeping shall be sufficient to enable the site to verify that the HACCP and food safety controls, including controls managed by prerequisite programmes, are in place and maintained.	Complies- Production Record for CCP Monitoring and HAACP Format for Monitoring PRPC	
<b>2.14</b>	Review the HACCP plan		
<b>Clause</b>	<b>Requirements</b>	<b>Conforms</b>	
<b>2.14.1</b>	<p>The HACCP food safety team shall review the HACCP or food safety plan and prerequisite programmes at least annually and prior to any changes which may affect food safety. As a guide, these may include the following, although this is not an exhaustive list:</p> <ul style="list-style-type: none"> <li>• change in raw materials or supplier of raw materials</li> <li>• change in ingredients/recipe</li> <li>• change in processing conditions, process flow or equipment</li> <li>• change in packaging, storage or distribution conditions</li> <li>• change in consumer use</li> <li>• emergence of a new risk (e.g. known adulteration of an ingredient or other relevant, published information, such as the recall of a similar product)</li> <li>• review following a recall</li> <li>• new developments in scientific information associated with ingredients, process or product.</li> </ul> <p>Appropriate changes resulting from the review shall be incorporated into the HACCP or food safety plan and/or prerequisite programmes, fully</p>	Verification of HACCP and Product, Infrastructure,	

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	<p>documented and the validation recorded.</p> <p>Where appropriate, the changes shall also be reflected in the company's product safety policy and food safety objectives.</p>		
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<b>7</b>	<b>Personnel</b>		
<b>7.1</b>	Training: raw material handling, preparation, processing, packing and storage areas		
<b>Fundamental SOI</b>	The company shall ensure that all personnel performing work that affects product safety, legality and quality are demonstrably competent to carry out their activity, through training, work experience or qualification.		
<b>Clause</b>	<b>Requirements</b>	<b>Conforms</b>	
<b>7.1.1</b>	All relevant personnel, including agency-supplied staff,	<b>Complies</b>	<b>SOP is Evident : SOP/11</b>

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	temporary staff and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.		
7.1.2	Where personnel are engaged in activities relating to critical control points, relevant training and competency assessment shall be in place.	Complies	
7.1.3	<p>The site shall put in place documented programmes covering the training needs of relevant personnel. These shall include, at a minimum:</p> <ul style="list-style-type: none"> <li>identifying the necessary competencies for specific roles</li> <li>providing training or other action to ensure staff have the necessary competencies</li> <li>reviewing the effectiveness of training</li> <li>delivery of training in the appropriate language of trainees.</li> </ul>	Complies	Training need identification record- F/HRA/01 is identified for 1 year
7.1.4	All relevant personnel, including engineers, agency-supplied staff, temporary staff and contractors, shall have received general allergen awareness training and be trained in the site's allergen-handling procedures.	Complies	Training Record – F/HRA/09
7.1.5	All relevant personnel (including relevant agency-supplied staff, temporary staff and contractors) shall have received training on the site's	Complies	

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	labelling and packing processes which are designed to ensure the correct labelling and packing of products.		
7.1.6	<p>Records of all training shall be available. These shall include, at a minimum:</p> <ul style="list-style-type: none"> <li>the name of the trainee and confirmation of attendance</li> <li>the date and duration of the training</li> <li>the title or course contents, as appropriate</li> <li>the training provider</li> <li>for internal courses, a reference to the material, work instruction or procedure that is used in the training.</li> </ul> <p>Where training is undertaken by agencies on behalf of the company, records of the training shall be available.</p>	Complies	
7.1.7	The company shall routinely review the competencies of its staff. As appropriate, it shall provide relevant training. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience.	Complies	
7.2	Personal hygiene: raw material handling, preparation, processing, packing and storage areas		
SOI	The site's personal hygiene standards shall be developed to minimise the risk of product contamination from personnel, be appropriate to the products produced and be adopted by all personnel, including agency-supplied staff, contractors and		

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		visitors to the production facility.		
Clause		Requirements	Conforms	
7.2.1		<p>The requirements for personal hygiene shall be documented and communicated to all personnel. These shall include, at a minimum, the following:</p> <ul style="list-style-type: none"> <li>• watches shall not be worn</li> <li>• jewellery shall not be worn, with the exception of a plain wedding ring, wedding wristband or medical alert jewellery</li> <li>• rings and studs in exposed parts of the body, such as ears, noses and eyebrows, shall not be worn</li> <li>• fingernails shall be kept short, clean and unvarnished</li> <li>• false fingernails and nail art shall not be permitted</li> <li>• excessive perfume or aftershave shall not be worn.</li> </ul> <p>Compliance with the requirements shall be checked routinely.</p>	Non Complies	During visit workers in the production area found with rubber belts on their hands which needs to be ensure with daily personnel hygiene monitoring
7.2.2		Hand-washing shall be performed on entry to the production areas and at a frequency that is appropriate to minimise the risk of product contamination.	Complies	
7.2.3		All cuts and grazes on exposed skin shall be covered by an	Complies	

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	appropriately coloured plaster that is different from the product colour (preferably blue) and contains a metal detectable strip. These shall be site-issued and monitored. Where appropriate, in addition to the plaster, a glove shall be worn.		
7.2.4	Where metal detection equipment is used, a sample from each batch of plasters shall be successfully tested through the equipment and records shall be kept.	Complies	
7.2.5	Processes and written instructions for staff shall be in place to control the use and storage of personal medicines, so as to minimise the risk of product contamination.	Complies	
7.3	Medical screening		
SOI	The company shall have procedures in place to ensure that employees, agency staff, contractors or visitors are not a source of transmission of food-borne diseases to products.		
Clause	Requirements	Conforms	
7.3.1	The site shall make employees aware of the symptoms of infection, disease or condition which would prevent a person working with open food. The site shall have a procedure which enables notification by employees, including temporary employees, of any relevant symptoms, infection, disease or condition with which they may have been in contact or be suffering from.	Complies	
7.3.2	Where there may be a risk to	Complies	medical screening was done.

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	product safety, visitors and contractors shall be made aware of the types of symptoms, infection, disease or condition which would prevent a person visiting areas with open food. Where permitted by law, visitors shall be required to complete a health questionnaire or otherwise confirm that they are not suffering from any symptoms which may put product safety at risk, prior to entering the raw material, preparation, processing, packing and storage areas.		
7.3.3	There shall be procedures for employees, contractors and visitors relating to action to be taken where they may be suffering from or have been in contact with an infectious disease. Expert medical advice shall be sought where required.	Complies	
7.4	Protective clothing: employees or visitors to production areas		
SOI	Suitable site-issued protective clothing shall be worn by employees, contractors or visitors working in or entering production areas.		
Clause	Requirements	Conforms	
7.4.1	The company shall document and communicate to all employees (including agency and temporary personnel), contractors or visitors the rules regarding the wearing of protective clothing in specified work areas (e.g. production areas, storage areas etc.). This shall also include policies relating to the wearing of protective clothing away from	Complies	

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	the production environment (e.g. removal before entering toilets, and use of canteen and smoking areas).		
7.4.2	<p>Protective clothing shall be available that:</p> <ul style="list-style-type: none"> <li>is provided in sufficient numbers for each employee</li> <li>is of suitable design to prevent contamination of the product (at a minimum containing no external pockets above the waist or sewn-on buttons)</li> <li>fully contains all scalp hair to prevent product contamination</li> <li>includes snoods for beards and moustaches, where required, to prevent product contamination.</li> </ul>	Complies	
7.4.3	<p>Laundering of protective clothing shall take place by an approved contracted or in-house laundry using defined criteria to validate the effectiveness of the laundering process. The laundry must operate procedures which ensure:</p> <ul style="list-style-type: none"> <li>adequate segregation between dirty and cleaned clothes</li> <li>effective cleaning of the protective clothing</li> <li>cleaned clothes are supplied protected from contamination until use (e.g. by the use of covers or bags).</li> </ul> <p>Washing of protective clothing</p>	Complies	As per Contract To Laundry for 3 Years.

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	by the employee is exceptional but shall be acceptable where the protective clothing is to protect the employee from the products handled and the clothing is worn in enclosed product or low-risk areas only.		
7.4.4	Protective clothing shall be changed at an appropriate frequency, based on risk.	Complies	
7.4.5	If gloves are used, they shall be replaced regularly. Where appropriate, gloves shall be suitable for food use, of a disposable type, of a distinctive colour (blue where possible), be intact and not shed loose fibres.	Not Applicable	Not Provided not in use.
7.4.6	Where items of personal protective clothing that are not suitable for laundering are provided (such as chain mail, gloves and aprons), these shall be cleaned and sanitised at a frequency based on risk.	Complies	

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