Chapter 3

DOCUMENTATION AND RECORD KEEPING

This chapter explains the importance of documents and record keeping. It also shows how they differ and recommends the best approaches for developing written programs.
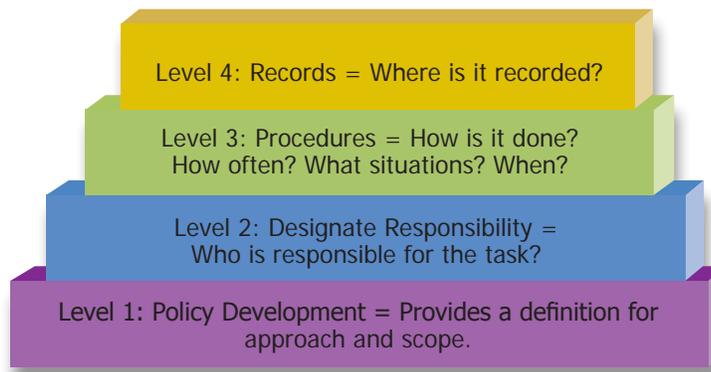
It is important to have standards, policies, and procedures written in simple, clear language to help employees with their job. Written instructions are very useful and assists in learning and often leads to employees bringing up good questions to help continually improve a system! Good documentation lets employees quickly double check their own work, without necessarily having to rely on others.

Documentation will:

- Prove that programs are effective and being completed as written;
- Demonstrate due diligence;
- Meet requirements for third party customer assessments/audits;
- Meet regulatory requirements; and
- Establish a paper trail to improve the current food safety program.

A facility may already have programs or activities in place. Processors should document and keep records of these programs. These can be used to prove that safety actions are taking place.

To develop a documentation system, it's important to break it into stages or levels. Each level expands to create a complete program and compares to one step in the development process.

Level 4: Records = Where is it recorded?

Level 3: Procedures = How is it done? How often? What situations? When?

Level 2: Designate Responsibility = Who is responsible for the task?

Level 1: Policy Development = Provides a definition for approach and scope.

1.0 DOCUMENTS AND RECORDS

It is important to understand the difference between a document and a record.

Documents	Records
• *Permanent* • *Describe facility policies and work instructions (Level 1, 2, and 3)* • *Define systems, processes and procedures*	• *Filled in as activity occurs (Level 4)* • *Provide proof that policies were followed or activities performed* • *Demonstrate processes and procedures are being conducted as required*

Records help provide proof that staff members complete necessary activities and that these activities are performed effectively.

Document and record all processes and activities. These documents and records should be stored in official files and remain accessible to staff who need them. Base the documents on the prerequisite programs and on the product protection or HACCP plan. If documents are already being kept, review them to make sure they are complete and that they follow the necessary standards.

Follow these three general principles to develop records and documents:

1. Keep it short and simple. Use bullet points and flow diagrams instead of long sentences and lengthy paragraphs.
2. Clarity is important. Step-by-step instructions are easily understood.
3. Use a standardized, consistent format. Although different programs may need different documents and records, using a similar approach will help staff learn quickly.

Let staff know that attempts to falsify records are easily detected. Auditors are trained to look for signs of fraud that can include records completed in the same increasingly messy handwriting and using the same pen.

Patterns or trends observed in records can be used as a basis for future food safety decisions.

Checking records regularly helps ensure that employees are completingtheir assigned activities. It helps to make sure that records are being filled out honestly and with all the information needed. Records are an important tool for analyzing and improving food safety. False records will not help improve the system or help you reach your goal of improved food safety!

Sample forms of records are included at the end of many chapters in this guidebook. Processors can use them as they are, or change them to meet a facility's specific needs.

At the very least, it is important that records include:

- **Who** is responsible for a specific duty;
- **How** they are to perform the duty;
- **When** they are to perform the duty;
- Spaces for the **date** and **initials** of the person who is responsible for the record(s); and
- Spaces for stating **deviation findings** (unusual situations or results outside of acceptable limits), and the **actions** taken to that fix that issue.

2.0 DOCUMENTING HACCP PLANS

HACCP plans provide the documents and records needed to make sure that the HACCP system is being followed at each critical control point. HACCP records differ slightly from prerequisite program records.

HACCP records provide a historical report of the following:

- Process;
- Monitoring procedures;
- Deviations; and
- Corrective actions taken at each critical control point (CCP).

These records can take a variety of forms (e.g. processing charts, checklists, written records, computerized records, etc.). HACCP records can help to trace a product or troubleshoot a problem. It's critical that a facility make sure HACCP records are up to date, complete and accurate.

Most of the record keeping will be noted on a CCP record. Procedures, responsibilities and activities related to these control points will be stated on HACCP Form 7 below. Monitoring results are usually recorded at the same time that deviations and corrective actions occur.

All HACCP documentation should include a report of who recorded, reviewed and approved the information.

HACCP Form 7: The HACCP Plan

FORM 7
HACCP PLAN
PRODUCT NAME: _____

Process Steps	CCP / Hazard Number	Hazard Description	Critical Limits	Monitoring Procedures				Deviation Procedures	Verification Procedures	HACCP Records
				Who	What	How	Frequency			

HACCP Plan: FORM 7 – HACCP PLAN

Issue date: _____   Date last revised: _____

Developed by: _____   Date authorized: _____

Authorized by: _____

HACCP Form 7 is used to document the procedures and activities associated with each critical control point. Each column breaks down the monitoring, deviation, verification, and record keeping required at each CCP. It breaks these into manageable pieces.

The following describes how to fill in each column.

Column 1. Process Step or Incoming Material – Enter in a description of each processing step or incoming material that has a CCP (as identified on HACCP Form 5 – Processing Steps, or on HACCP Form 5 – Incoming Materials).

Column 2. CCP Hazard Number – The number given to each CCP is transferred into this column to make sure they correspond.

Column 3. Hazard Description – This column identifies the type of hazard that this CCP addresses.

Column 4. Critical Limits – This column identifies the standards that the product should be safely produced on. These standards must be clearly defined, objective and measurable.

Column 5. Monitoring Procedures – This column is broken down into four to identify monitoring procedures and how they will be used on the production floor. Monitoring procedures need to indicate:

    i. **Who** will perform the task (recorded in WHO column);

    ii. **What** will be monitored (recorded in WHAT column);

    iii. **How** it will be monitored (recorded in HOW column); and

    iv. **Frequency** it will be monitored (recorded in FREQUENCY column).

Column 6. Deviation Procedures – This column is used to record deviation procedures and also to refer to documents that contain deviation procedure instructions. Deviation procedures need to indicate:

    i. **Who** will perform the task;

    ii. **What** the task is;

    iii. **How** the task is to be performed;

    iv. **Where** this information will be recorded; and

    v. **Cause** of the deviation (if known).

Column 7. Verification Procedures – This column may be used to record verification or can to refer to the documents that contain verification procedures. Verification procedures need to indicate:

    i.   **Who** is responsible for the activity;

    ii. **What** is being tested or examined;

    iii. **Why** this is being tested or examined;

    iv. **How** is the activity being carried out;

    v.   **When** is the activity done (e.g. frequency); and

    vi. **Where** the results or information are recorded.

Column 8. HACCP Records – This is a list of all documents and records connected with each CCP. State where each record can be found to assist facility employees.

3.0 CREATING AN AUDITABLE PROGRAM

An auditable program must have controlled documents and records. The main focus of an audit is the review of documents and records, but an auditor will also review procedures.

Figure 2: Components of an Auditable Program

The Components of an Auditable Written Program

1. **Developing the program**: Creating a written documentation of who performs each task, what and how is it being done and how often. The written program includes any regulatory requirements (e.g. temperature controls) relating to the operation.

2. **Implementing the program**: Creating records of activities.

3. **Proving it**: By maintaining documentation and records that demonstrate development and implementation.

3.1 Document and Record Control

A controlled document or record must contain the following:

- Title
- Creation/revision date
- Page number
- Prepared by/issued by
- Approved date
- Approval signature

By including this information on each page a facility will be able to maintain control of the document or record. Include this information either in the header (top of the page), footer (bottom of the page) or in a combination of the two.

Controlled documentation also ensures that when the system is revised or updated, processors will use only the most up-to-date documents or records. This also helps processors make sure that changes are not made to the system without proper knowledge and approval.

Figure 3: Example of Document Control

Document Title	
Prepared By:	Date Issued:
Revised By:	Date Revised:
Approved By:	Page # of #

Although outdated documents and records should be kept for reference and auditing, remove outdated information from circulation to avoid confusion.

A Revision Log is a list of changes made to each document or record and helps to track the change, the date of the change, who made the change, and why the change was made. This process helps eliminate unnecessary changes to documents and records.

For an example of a revision log, see form HACCP Revision Log in Chapter 15.

4.0 DOCUMENTATION SYSTEM FORMATS

There is more than one correct format for a documentation system, but it must include all necessary information and be easy to read and understand.

Figure 5: Information to Include

Description of Activities and Qualifiers

Who: Identifies the person or position responsible for carrying out the activities.

What/How: Describes what is done and provides instruction (monitoring procedures) on how it's done. Includes:

- Duties and how they are completed;
- Acceptable and unacceptable standards/limits (if applicable);
- Records to be completed and how they are completed; and
- References to other bullet points and/or manuals.

When: Describes how often (frequency) the monitoring procedure is done.

Records: Describes what records are kept and where they are located.

Deviation and Corrective Action Procedures: In the event that a deviation from normal occurs (e.g. outside of the acceptable limits), the corrective action procedure describes the actions to be taken to correct the deviation. It includes who, what, how and a record description.

Verification Procedures: Verification procedures ensure that the monitoring procedures have been performed correctly. This involves a different person/position than the who in the monitoring procedure. Verification procedures also include who, what, how and a record description.

Three formats for a written program are essay, matrix, or combination.

Processors can use one of three formats for formal documentation: essay, matrix or a combination of the two.

1. Essay – written in paragraph or bullet form.

Essay – written in paragraph or bullet form. This image is from the example program

Verification Procedures

D. PERSONNEL/TRAINING
D.1 GENERAL FOOD HYGIENE
D1.1 General Food Hygiene Training
D1.1.1 A policy is in place and enforced to ensure good personal hygiene and hygienic behavior to prevent contamination of food products. This protocol shall cover hand washing/sanitizing, protective clothing and hygienic practices (e.g., no food, gum, tobacco, jewelry, storage of personal effects in food handling areas)

RESPONSIBLE PERSON
HACCP Coordinator or Facility Manager is responsible for maintaining the Employee Hygiene Program.

Facility foreman or designated trained employee is responsible for daily monitoring to ensure compliance with Employee Hygiene Program.

All employees are responsible for complying with the Employee Hygiene Program.

FREQUENCY
Personal hygiene and safe food handling practices are enforced daily

PROCEDURE
The Employee Hygiene Program outlines the practices to be followed by all plant employees to ensure personal hygiene and safe food handling. This policy includes:
  a. Hand washing/sanitizing practices
  b. Protective clothing requirements
  c. Hygienic practices (e.g., no food, gum, tobacco, jewelry, personal effects in food handling areas).
See Employee Hygiene Program for more details.

Personal hygiene practices are monitored daily by the facility foreman or designated trained employee and findings are recorded on the Daily Hygiene Record. Foreman will monitor employee behavior twice daily during their usual working hours. Monitoring will be conducted once before lunch and once after. Satisfactory findings are indicated by a number one in the space and unsatisfactory findings are indicated by a zero in the space. Foreman will document any deviations/corrective actions. All records will be filled in with ink pen.

DEVIATION PROCEDURES/CORRECTIVE ACTIONS
Names of any employee not following proper Good Manufacturing Procedures will be recorded on the Daily Hygiene Record. Corrective action is based on the severity and history of the deviation (i.e., first time offense vs. repeat occurrence of same deviation) and may include:
  a. Re-enforcing training and importance of hygiene practice with the employee
  b. Re-training of employee on all hygiene practices
  c. Disciplinary action

VERIFICATION PROCEDURES
Onsite Verification:
Monthly the HACCP Coordinator will monitor employee practices at a time separate from Foreman using the Daily Hygiene Record to verify that employees are following in house procedures and Foreman is documenting deviations appropriately.

HACCP Coordinator will observe Foreman conducting Daily Hygiene monitoring activities three times/year to verify monitoring procedures are being undertaken appropriately.

Record Verification:
Daily Hygiene Record – Weekly by HACCP Coordinator - HACCP Coordinator will review all records filled out since the last verification to ensure that they are complete, accurate and completed according to this procedure.

Once verifications are completed the HACCP Coordinator will sign and date the appropriate 'verification' section of Daily Hygiene Record for the date that the verification is performed. Record any deviations/corrective actions taken during the verifications.

RECORDS
Daily Hygiene Record

Cross Reference:
Employee Hygiene Program

Who?

When?

What / How?

Corrective Actions

Records

2. Matrix - a simple chart. This is an ideal format to use when the information can be recorded in a limited space.

	Monitoring or Activity	Deviation Procedures	Verification Procedures
Who			
What/How			
When			
Records			

3. Essay/Matrix Combination – a chart filled in using paragraphs or bullets to provide the detail. This is the best format to use if program descriptions (what/how) require more explanation.

4.1 Monitoring or Activity Section

Activities identified in this section can vary from cleaning procedures to training instructions. The information must be simple, direct and explained clearly. Any employee reading this section should understand exactly how to perform the described duties.

It is important that all procedures or instructions are simple and direct.

Use the 'Monitoring or Activity' section to report the regular measuring and reporting of values of your steps or activities. These values are used to determine whether a situation is under control. Monitoring works best if performed continually. However, if this is not possible, develop procedures based on the most effective timing of these activities in the facility.

4.2 Deviation Procedures and Corrective Actions

Although it may be easy to recognize when problems exist in a facility, it can be challenging to make sure that these situations are reported. It may also be challenging to make sure that corrective actions are taken and reported. Completing records of the corrective actions is important for the following reasons:

- Assists the company to prove due diligence;
- Demonstrates a commitment to problem solving and the management of food safety issues;
- May lead to improved employee performance;
- Reduces unproductive, repetitive activities; and
- May reduce costs by revealing what activities aren't working.

It's important that corrective actions are reported in full each time there is a deviation or a change outside the acceptable limits in the food safety system. Complete documentation should include:

- The date and time the deviation was observed;
- Nature of the deviation;
- Whether product or food contact surfaces are affected;
- What corrective actions are to be taken;
- The timeframe for completion of corrective actions;
- Signature of responsible employee; and
- Verification date, time and signature indicating that the activity was completed satisfactorily.

Below are some examples of poor and appropriate corrective action reports.

Observations	Poor Corrective Action Reported	Appropriate Corrective Action Reported
No paper towel in restroom	Paper needs restocking	Restocked paper towel and directed sanitation employee to re-stock restroom daily/more frequently.
Transport carrier has dirt build-up inside	Trailer needs sweeping	Truck driver swept trailer – was clean before boxes were loaded.
Raw materials spilled on floor	Floor needs cleaning	Sanitation crew cleaned floor and disposed of spilled material – no other product was affected.
Soda cans and food items observed in production area	Soda cans and food need to be removed from production area	Food and soda cans disposed of – no product or equipment was affected. Informed staff that food items are not allowed in production areas. Disciplinary action for violators documented in personnel files.

Corrective actions are determined by processors. Processors may report corrective actions directly onto associated records, provided there is enough space to report all the necessary information. Another option is to create a Corrective Action Request form as shown in Figure 6.

Figure 6: Corrective Action Request

Blank copies of the Corrective Action Request form can be kept in key areas of the facility. They can be attached to or stored with the related monitoring record.

Deviation and corrective action procedures should be included for each relevant prerequisite program bullet and critical control point. These procedures should identify the most common deviations and examples of useful corrective actions for each. These procedures should also explain how and where to document this information.

4.3   Verification Procedures

Verification involves the methods, procedures, tests or other forms of evaluation used to check that a written program is being followed. Verification ensures that:

Think of verification as "checking the checker."

- Activities are performed according to procedures;
- Activities are performed at the correct times / frequencies;
- Effective corrective actions are recorded for any deviations; and
- Records are completed accurately and at the correct frequency.

Verification includes:

- Checking system conformity;
- Matching performance to records; and
- Confirming the effectiveness of the system.

Note: All process changes require a verification of the system.

5.0 SOURCES OF INFORMATION

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3. GOAL/QPC (2000) *The Memory Jogger 9000/2000 – A Pocket Guide to Implementing the ISO 9001 Quality Systems Standard.*

4. Alberta Food Processors Association (2002) *Effective Records for HACCP – Participant Manual.*

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7. Peterson, D. E. (2001) *Documenting Corrective Actions* [online], Available from: www.foodboss.com/foodsafety102001.htm.

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