

**EVALUATION OF THE FOOD SAFETY SUPERVISOR REQUIREMENT  
OF THE VICTORIAN FOOD ACT 1984**

*Component 2. Competencies of Food Safety Supervisor's Reported to  
Local Government Authorities*

**Report for Department of Human Services Food Safety Unit  
June 2005**

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**A Project Jointly Undertaken by the Department of Human Services North and  
West Metropolitan Region and Barwon-South Western Region for the  
Department of Human Services Food Safety Unit**

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But most importantly, members of the Project Team would like to sincerely thank the six Councils which were involved in this project. Their willingness to allow the project officer to access their files and their cooperation was integral to this projects success.

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## 1. Executive Summary

This report details the competencies of current Food Safety Supervisor's (FSS) from information they provide to their local Council. The project is one of four components of the Food Safety Supervisor Requirement Evaluation Project being undertaken by the Department of Human Services (DHS) Food Safety Unit.

Data was collected from three metropolitan Councils (inner city, suburban and growth corridor) and three rural Councils. Specific FSS information from Council files was collected including industry sector, type of training undertaken, detailed evidence provided of that training, and information relating to the training provider. The food sectors and the corresponding competencies required by a FSS working in each sector are specified by DHS and have been strictly applied.

The files that were being accessed for the project were all registered food premises that required a food safety program. The registering authority for the purposes of this project was Local Government, which excludes premises such as meat premises, dairy premises and all other premises registered with other authorities.

All information is drawn from notes and evidence found on Council files. FSS competencies that have been obtained by FSS after Councils have inspected/visited premises are not included, unless premises have provided this information to Councils.

A total of 2977 (97.5%) Council files were sighted from a total of 3054 files. Of the total 2977 files, 76.8% (2287) were from metropolitan Councils and the remaining 23.2% (690) were from rural Councils.

Of the files examined, 1710 had some evidence (or records) of training on file. This accounted for 57.4% of all files sighted. Metropolitan Councils had 61.6% (1408) of files with training evidence present compared to 43.8% (302) of rural Councils.

A total of 728 (42.6%) of the 1710 records were found to meet the minimum units of competency for their respective food sector. The sector with the highest rate of compliance was the transport and distribution sector followed by hospitality, food processing, retail, health and community services sectors.

Of the remaining files that did not meet the minimum competencies, 78.5% listed other competencies. This may indicate that FSS do not know what competencies they are required to obtain for their respective food sector.

Of the records sighted with training evidence, 93% of the training was provided by accredited training providers. The remaining training appears to be provided by unaccredited providers, the majority being in the retail and hospitality sectors. However, these results should be viewed with caution, as training providers were not required to provide an RTO code prior to 1 July 2002 and 37% of the training provided by seemingly unaccredited training providers was provided before this date.

Over 79% of the records of training from accredited training providers did not meet the AQF Implementation Handbook requirements. The reasons vary from minor to significant including competency names and codes missing or incorrect, no authorised signatory on the evidence and training provider contact details missing.

While the percentage of class 1 premises with records in the data collection was low (2%) it did highlight that independent auditors are noting that FSS training as adequate or consistent with the licence application when in the majority of cases it is not. Of the 65 records, 29 had the independent auditor note the training as adequate but only 8 met the minimum competency standards.

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## 2. Purpose

This report details the competencies of current Food Safety Supervisor's (FSS) from information they provide to their local Council. The project (component 2) is one of four components of the Food Safety Supervisor Requirement Evaluation Project being undertaken by the Department of Human Services (DHS) Food Safety Unit.

Component 2 aims to provide statistical data for the other components of the project and other work being undertaken by the Food Safety Unit.

The other components are:

Component 1

- Aims to determine the skills and knowledge required by FSS's for compliance.

Component 3

- Aims to provide information regarding how and what Registered Training Organisations (RTO's) are currently offering in food safety training. This included determining the recognition process for prior and current competencies of individuals, as well as the best method for the Food Safety Unit to disseminate information regarding this training.

Component 4

- Aims to determine the understanding of all stakeholders of the skills and knowledge required by FSS and to determine any other issues involved in ensuring that FSS's are able to carry out their responsibilities.

## 3. Methodology

Component 2 enlisted the co-operation of three metropolitan Councils and three rural Councils. They were selected to ensure maximum representation in the range of food sectors, however it is acknowledged that industry groups within some food sectors may not necessarily be represented. The Councils were also selected to be representative of Councils across the State. They were identified as:

- Inner city
- Suburban
- Fringe (growth corridor)
- Rural

A data collection tool (Appendix 1) was developed to collect specific FSS information from Council files including:

- Council demographics
- Industry sector
- Type of training undertaken
- Detailed evidence provided of that training, and;
- Information relating to the training provider

The files that were being accessed for the project were all registered food premises that required a food safety program.

The registering authority for the purpose of this project is Local Government, which excludes premises such as meat premises (eg. butchers, fresh seafood), dairy premises (eg. cheese factory, dairy manufacturers) and all premises registered with other authorities. Low risk food premises that are registered with local Councils but exempt from requiring food safety programs were also not in the scope of this project.

The food sectors and the corresponding competencies required by a FSS working in each sector are specified by DHS<sup>5</sup> and have been strictly applied. These are:

<b>Food Sector</b>	<b>Minimum Competency Standard</b>
Food Processing	FDFCORFFSY2A 'Implementing the food safety program and procedures' Earlier training: FDFCORFS1A 'Apply basic food safety practices' FDFCORS2A 'Implement the food safety program'
Retail	WRRLP.6C 'Apply retail food safety practices'
Health	HLTFS7A 'Follow basic food safety practices' HLTFS10A 'Apply and monitor food safety requirements' HLTFS9A 'Oversee the day to day implementation of food safety in the workplace' Earlier training: THHBCC11A 'Implement food safety procedures'
Community services	Use units from the Health sector
Hospitality	THHGHSO1B 'Follow workplace hygiene procedures' THHBCC11B 'Implement food safety procedures'
Transport and distribution	Use relevant units from other sectors

All information is drawn from notes and evidence found on Council files. FSS competencies that have been obtained by FSS after Councils have inspected/visited premises are not included unless premises have provided this information to Councils.

## **4. Results**

A total of 2977 (97.5%) Council files were sighted from a total of 3054 files for registered premises that require a food safety program.

Of the files examined, 1710 had some evidence (or records) of training on file. This accounted for 57.4% of all files sighted. A total of 728 (42.6%) of the 1710 records were found to meet the minimum units of competency.

This section will provide an analysis of the 1710 files which had some evidence (or records) of training on file including an analysis of the evidence provided by training providers.

### **4.1. Metropolitan v Rural**

Of the total 2977 files, 76.8% (2287) were from metropolitan Councils and the remaining 23.2% (690) were from rural Councils.

Metropolitan Councils had 61.6% (1408) of files with training evidence present compared to 43.8% (302) of rural Councils.

<sup>5</sup> Department of Human Services. Food Safety Supervisor Competencies and Training, March 2005, [www.health.vic.gov.au/foodsafety](http://www.health.vic.gov.au/foodsafety)

The sector with the highest rate of training on file in the metropolitan region was the health sector at 70%, closely followed by the hospitality sector at 65.7%. However, only 28.6% of health sector records actually met the minimum competency standards and 58.2% of hospitality sector records met the minimum competency standards.

In the rural region the sector with the highest rate of training evidence being supplied was the food processing sector (48.8%). Again this is followed by the hospitality sector with 45.7% of files containing some evidence of training. Of these records on file, 10% of food processing and 18.5% of hospitality sectors, met the minimum competency standards.

In the metropolitan region, 678 records of training of the 1408 seen, met the minimum competency standards. Most of the records 662 of the 678 (97.5%) were dated after the 1 January 2002. In the region, all training that met the minimum competency standards were conducted after this date.

The rural region had two sectors with zero levels of compliance, health and the transport and distribution sectors. However, for each of these sectors there were a small number of premises. The health sector included 10 premises with 4 providing records to Council. The transport and distribution sector included 7 premises. All premises were found not to have any records provided to Council.

#### **4.2. Sector Records**

Within the six recognised sectors, hospitality accounted for the most files sighted (61.9%). This is followed by the retail sector accounting for 23.4% of all files sighted. The remaining 14.7% is divided between the other four sectors, in order, food processing, community services, transport and distribution and health (Table 1).

Overall 57.4% of files sighted had some evidence (or records) of training. The rate at which premises within the sectors had provided evidence (or records) of training to Council was between 40% and 61% (Table 1).

**Table 1: Number of Premises Files and Records of Training by Sectors**

<b>Sector</b>	<b>No. Premises Files</b>	<b>% of All Premises Files</b>	<b>No. Files with Records of Training</b>	<b>% of Files with Records of Training</b>
Hospitality	1838	61.9	1118	60.8
Retail	698	23.4	389	55.7
Food Processing	244	8.2	117	48.0
Health	20	0.7	11	55.0
Community Services	136	4.6	54	39.7
Transport & Distribution	41	1.4	21	51.2
<b>Total</b>	<b>2977</b>	<b>100%</b>	<b>1710</b>	<b>57.4%</b>

Focusing on the files where records of training were provided, 86.4% of training was conducted after 1 January 2002, the date the FSS minimum competency requirements were first introduced.

A total of 12 records of training were found not to have a recordable date. This was usually due to poor photocopying, either cut off or unreadable, or in one case the date did not include a year, simply a day and month. These records have not been included in data for records after 1 January 2002. Of these 12 records, three in the hospitality sector were found to meet the minimum competencies.

### 4.3. Sector Training

Of the 1710 records of training sighted, 728 met the minimum competency standards (Table 2). This is a compliance rate of 42.6%.

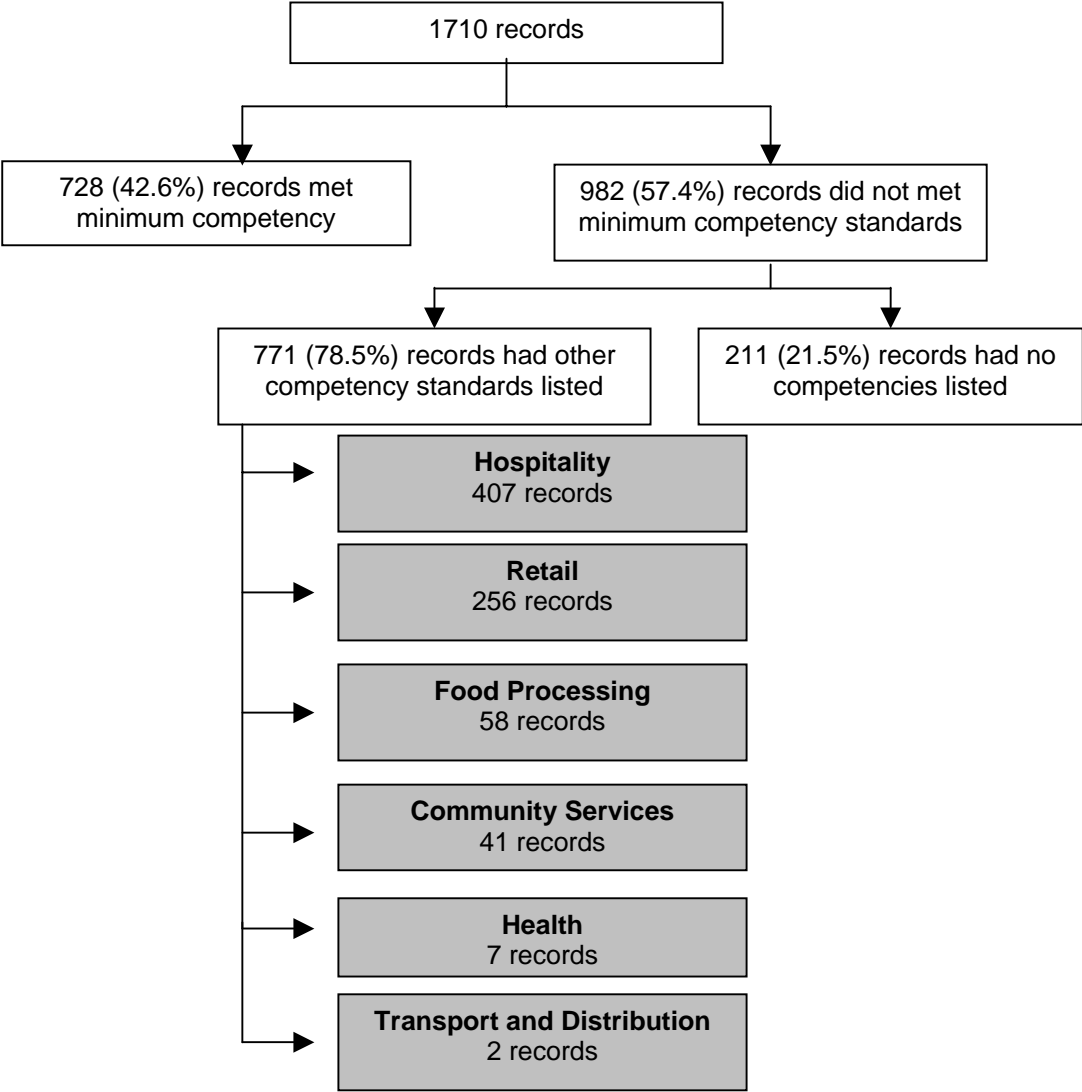
The sector with the highest rate of compliance was the Transport and Distribution sector at 85.7% (Table 2). This may be because the DHS minimum competency standards allows for the FSS to be considered competent in any of the other sectors' requirements, including earlier training. Of the 18, 14 met hospitality sector competencies (4 also met food processing competencies, a further 2 also met earlier training for the food processing sector and 1 also met retail competencies). Of the remaining, 2 met food processing sector competencies and 2 met retail competencies.

**Table 2: Compliance by Sector**

Sector	No. Files with Records of Training	No. Minimum Competencies	%
Hospitality	1118	569	50.9
Retail	389	95	24.4
Food Processing	117	38	32.5
Health	11	2	18.2
Community Services	54	6	11.1
Transport & Distribution	21	18	85.7
<b>Total</b>	<b>1710</b>	<b>728</b>	<b>42.6</b>

Of the remaining 982 (57.4%) that did not meet the minimum competencies, 771 (78.5%) listed other competencies completed (Figure 1).

**Figure 1: Other Competencies Provided as FSS Competencies**



**4.3.1. Hospitality Sector – Other Competencies**

For records in the hospitality sector that did not meet the minimum competencies, a total of 407 (41.4%) records listed other competencies. Of these, 247 (60.7%) had other hospitality competencies provided as FSS competencies. Many variations exist, however the most notable are listed in Table 3.

**Table 3: Other Hospitality Competencies Provided as FSS Competencies for Hospitality Sector**

<b>Competency Unit Number</b>	<b>No.</b>
THHBCC11A only	7
THHGHS01A only	34
THHGHS01A -with THHBCC11A	89
-with THHBCC11B	20
-with other competencies	4
THHBCC11B -only	33
-with other competencies	11
THHGHS01B -only	33
-with THHBCC11A	2
-with other competencies	14
<b>TOTAL</b>	<b>247</b>

The remaining 160 records that did not have hospitality competencies undertaken by the FSS are detailed in Table 4.

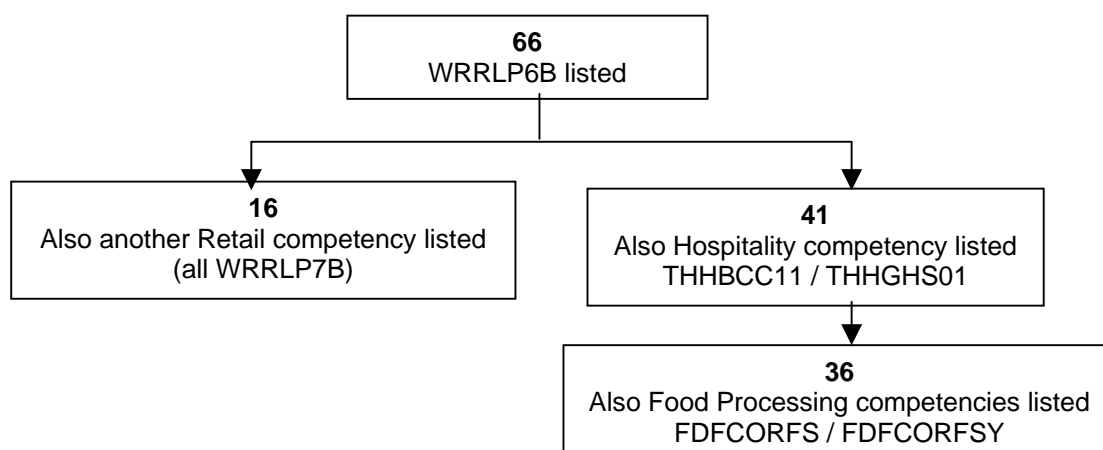
**Table 4: Other Sector Competencies Provided as FSS Competencies for Hospitality Sector**

<b>Other Sector Competency Units</b>	<b>No.</b>
Retail -only	21
-with Food Processing competencies	33
Food Processing	83
Additional	14
Codes suggest Hospitality competencies (missing prefix or version, or both)	6
Codes not listed, only description	3
<b>TOTAL</b>	<b>160</b>

#### ***4.3.2. Retail – Other Competencies***

For records in the retail sector that did not meet the minimum competencies, a total of 256 (26.1%) records provided other competencies than the required WRRLP6C listed. Sixty-six (25.8%) of these were an earlier version of the competency, WRRLP6B. Within those 66 records, 16 also had WRRLP7B and 41 were coupled with hospitality competencies. Of the 41 records with hospitality competencies, 36 also had food processing competencies attached (Figure 2).

**Figure 2: Early Version of Retail Competency**



The remaining 190 records from the retail sector that had competencies other than retail competencies are listed in Table 5.

**Table 5: Other Sector Competencies Provided for FSS Competencies for Retail Competencies**

Other Competencies listed	No.
Food Processing	28
Health	2
Hospitality	148
Additional (some WRRLP7B, mainly Woolworth's competencies)	12
<b>TOTAL</b>	<b>190</b>

#### **4.3.3. Food Processing – Other Competencies**

A total of 58 (5.9%) records that did not meet the food processing minimum competency standards had other competencies listed.

One of these acquired FDFCORFS1A and three with FDFCORFS2A. To be considered competent in this sector, both competencies together meet the earlier requirements.

The remaining records had competencies other than food processing competencies listed. There were 42 in hospitality and 12 in retail competencies.

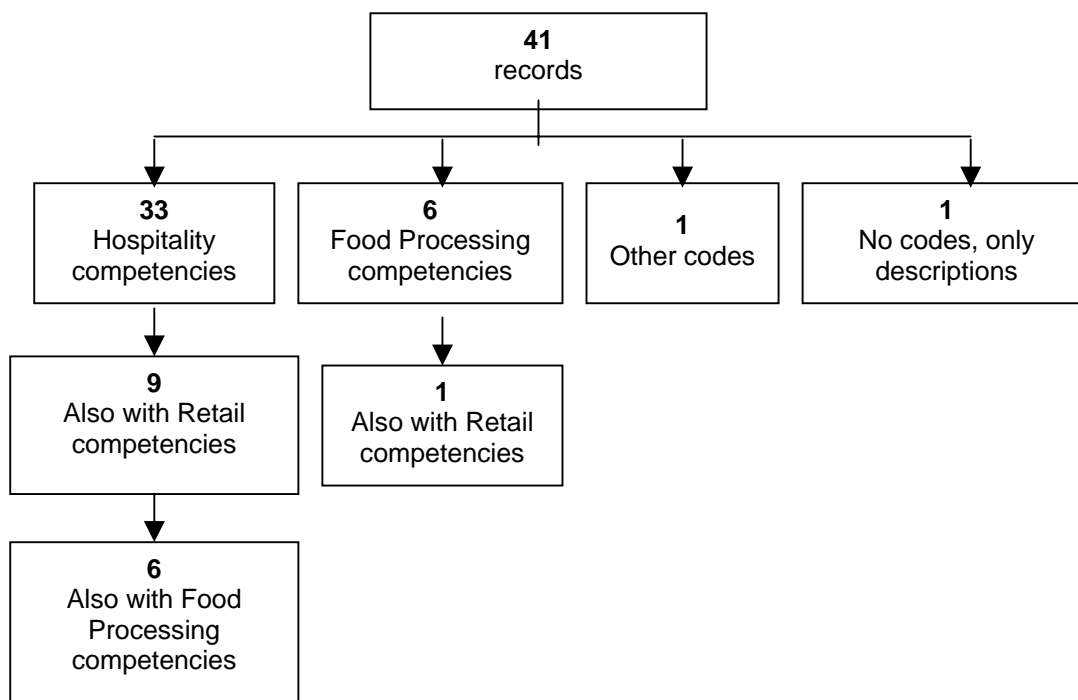
#### **4.3.4. Health – Other Competencies**

As for the health sector, three units of competency comprise the minimum standards for the FSS to meet the minimum competency standards. For the 7 (0.7%) records that had other competencies listed, all were from the hospitality package, with one having additional retail and food processing competencies listed.

#### 4.3.5. Community Services – Other Competencies

The minimum competency standards for the community sector comprise of three units from the Health Training Package. For records in the community services sector that did not meet the minimum competencies, 41 (4.2%) had other competencies. All had records that were not the health competencies required (see Figure 3).

**Figure 3: Other Competencies Provided for ESS Competencies in the Community Services Sector**



#### 4.3.6. Transport & Distribution – Other Competencies

In this sector, the FSS can be considered competent by applying any of the other sector's minimum competency standards. Only two records were found to not meet any minimum competency standards. One was a food processing competency and the other was a hospitality competency that also listed another retail competency.

#### 4.4. Accredited & Unaccredited Training

During the data collection process when observing evidence of training, assessment of whether the training was provided by an accredited RTO was undertaken. The method used to determine this was by identifying the training provider code or number on the certificate/statement of attainment or other form of evidence kept on the food premises file. Should the evidence have a training provider code listed, this would indicate that the Victorian Qualifications Authority (VQA) has registered it to deliver training.

The protocol for defining the forms of Statements of Attainment and Qualifications is outlined in Australian Qualification Framework (AQF) Implementation Handbook, Third

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Edition 2002<sup>6</sup>. It lists the features to be included on these forms of evidence. The training providers code is one requirement and this is why it was selected.

There were at least 126 training providers identified in the project. Not all of these were accredited and not all training undertaken was appropriate for the FSS in their sector.

In some cases, training providers (eg Swinburne University of Technology, University of Ballarat) were observed to not list their RTO code on Certificates or Statements of Attainment.

There were also instances where RTO's seen throughout the project have had evidence of training with and without their code listed. Where the date was relatively close to other evidence seen, it was assumed they were a registered training provider at the time training was undertaken. Where the date on evidence provided is significantly older than other evidence witnessed with an RTO code during the course of this project, then it was not assumed that the training provider was accredited.

Institutions, such as Footscray Institute of Technology (later became Victoria University of Technology), where a Diploma from 1974, or University, which issued a Degree in 1981 and were provided as evidence, could also be assumed that the training provider was accredited at the time.

Training providers in the project that are recorded as both accredited and unaccredited were:

1. City of Melbourne (aka Food Safety Training and Consulting)
2. Manningham City Council
3. Gen'sis Pty Ltd
4. Mayfield Education Centre
5. Serve-Safe Food Hygiene Training Services

A total of 1588 (92.9%) records of training were provided by accredited training providers. Of these, 272 (17.1%) were found not to have any RTO code listed. Twenty-six (9.6%) of these were either letters from a training provider or a Statement of Results and therefore did not meet the AQF requirements for a Statement of Attainment or Qualification. The remaining 246 (90.4%) records without RTO codes, however considered accredited, are spread across 39 training providers (Appendix 2).

Of the 1710 records sighted in the project, 122 (7.1%) have been provided by, what appears to be, 44 unaccredited training organisations. Training providers were not required to provide an RTO code prior to 1 July 2002. Of the 122 records provided by seemingly unaccredited training providers, 45 or 36.8% (all sectors) were pre 1 July 2002. The distribution of unaccredited training providers by sector are listed in Table 6.

The metropolitan region accounted for 95 (77.9%) records, where the remaining 27 (22.1%) were from the rural region. Coles Myer Institute provided 36 of these and a further 22 were provided by ARAV Retail Institute. A full list of seemingly unaccredited RTO's and the number of records that were provided for the project is detailed in Appendix 3.

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<sup>6</sup> Australian Qualification Framework Implementation Handbook, Third Edition 2002, [www.aqf.edu.au/implem.htm](http://www.aqf.edu.au/implem.htm), pp 69-72

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**Table 6: Unaccredited Training by Sector**

<b>Sectors</b>	<b>No.</b>
Hospitality	28
Retail	72
Food Processing	6
Community Services	6
Health	0
Transport & Distribution	0
<b>TOTAL</b>	<b>122</b>

Within the retail sector, 24 of the 72 records provided met the minimum competency standards. Within the community services sector, 2 of the 6 records provided met the minimum competency standards. Although an unaccredited training provider provided the training, these figures were included in the overall statistics.

#### ***4.5. Evidence of Training***

##### ***4.5.1. Types of Training***

When assessing evidence of training, it was determined that it must fall into one of four categories. These categories are:

1. A short course,
2. A whole qualification,
3. Part of a whole qualification, or
4. A Higher Education qualification.

Short courses account for most of the training undertaken by FSS, at 89.3% of the records. 8.6% of records were part of a whole qualification, where 1.9% records were actually a whole qualification. Only six records out of 1710 (0.4%) were of a higher education qualification. Further details on the type of training by sector and region are in Appendix 4.

##### ***4.5.2. Type of Evidence***

The type of evidence provided to Councils varies. Of the 1710 records observed, 1230 (71.9%) were Statements of Attainment and 45 (2.6%) were Certificates with Statements of Attainment. Forty-four (2.6%) Statements of Results were provided and 295 (17.3%) records were titled a Certificate. The remaining 96 (5.6%) records were other types of evidence. Examples of these are:

- Certificate of Achievement
- Certificate of Attendance
- Certificate of Competency
- Certificate of Participation
- Statement of Attendance
- Statement of Participation
- Certificate of Attainment
- Certificate of Completion
- Certificate of Recognition
- Statement of Achievement
- Statement of Completion
- Record of Participation
- Letters from and RTO

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The 1588 records of training from accredited training providers can be further separated by whether they fulfil the AQF Implementation Handbook protocol. A total of 1257 (79%) of the records did not meet the AQF Implementation Handbook requirements, 276 (17.4%) met AQF requirements and 55 (3.5%) were not applicable.

The 55 (3.5%) records that were not applicable to the AQF Implementation Handbook requirements were mostly Statements of Results (42) and either higher education evidence (eg. degree) letters from training providers or an academic transcript acquired overseas (13).

Of the 276 (17.4%) records that met AQF Implementation Handbook requirements, 237 (85.9%) were from the metropolitan region and 39 (14.1%) from the rural region. A total of 161 (58.3%) were Statements of Attainment, 108 (39.1%) were Certificates and 7 (2.5%) were Certificates with Statements of Attainment.

For the remaining 1257 (79%) records that did not satisfy the AQF Implementation Handbook requirements, reasons vary from minor to significant. As some records may have contained more than one breach, records may be represented more than once in the following data.

Minor breaches are described as the words "This Statement of Attainment is recognised within the Australian Qualification Framework" are either similar, but not the same, or missing altogether. Seven records only had this information missing. A further 480 records had these words missing along with other information not present.

Training provider contact details were missing for 1160 records. This information is only required on Statements of Attainment and not Qualifications. Of the 1160, 696 were only deficient in meeting the AQF requirements because they had this information missing.

Information regarding competency names and codes accounted for 179 of the deficient records. Deficiencies included competency code prefixes missing, version codes not listed, typing errors (eg. extra letter included in unit code), or either unit names or code were not present on the record.

Six records also failed to have an authorised signatory on the evidence. One training provider used an italicised text name as the authorised signatory. Discussions with the Office of Training and Tertiary Education (OTTE)<sup>3</sup> indicated that the reason for a signatory is mainly a quality control issue for the training provider. In the above case, training providers can choose to use an italicised text name as the authorised signatory.

Training provider codes missing from evidence of training was examined earlier, listing 246 records without them. Sixteen of these were missing only the code, where the remaining 230 also had other deficiencies listed.

Eight-eight records of training had significant deficiencies, missing a combination of RTO codes, contact details and competency unit and code details.

#### ***4.5.3. Evidence of the Food Safety Supervisor***

In 85 (5%) cases, the evidence on file was not for the nominated FSS. Where the FSS has been changed by correspondence with Council, changed on renewal of registration forms or new FSP business details had been lodged, then this would satisfy as notification of a change of FSS.

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<sup>3</sup> Personal Communication, Office of Training and Tertiary Education, 17 February 2005.

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In the Metropolitan region, 73 (85.9%) records were found not to be for the nominated FSS. Fifty were from the hospitality sector, 14 from retail and 9 from the food processing sector.

In the rural region, 12 records (14.1%), (8 from hospitality and 4 from retail), comprised the records that were not from the nominated FSS. In most cases, it seemed to be a relative who had undertaken training, rather than the nominated person.

#### ***4.6. Local Government Authorities***

All six Councils have differing methods of storing food safety information and premises information. There are varied policies in response to the changes to the Food Act 1984 and the introduction of the Food Safety Standards.

These variations are reflected in the data collection for the project in terms of Council decisions regarding FSP requirements, application of Government Gazette information, conditions for renewal of registration under the Food Act 1984 and administrative restrictions that will impact Councils ability to perform tasks.

In relation to the collection of FSS training records, it is acknowledged that two schools of thought exist:

1. That the proprietor must either provide evidence of training to Council or that an EHO must sight the evidence for the FSS to be considered competent.
2. That the Food Act 1984 only requires the proprietor to provide the details of the FSS and training and that it is the proprietors responsibility to ensure this is appropriate for their food business. By the Council requesting FSS training information, it then transfers the onus of ensuring the FSS is appropriately trained from the proprietor to the Council.

Risk management strategies would then suggest that if the Food Act does not specifically require the lodgement of this information, then there is no need to request evidence from the proprietor. The six Councils involved do not apply this rational to their own policies at the time of the project.

One Council previously adopted this understanding, however, has completely revised their policy to the point that, should FSS evidence of training not be on file, a conditional registration is issued and the proprietor must enter into a Letter of Agreement with the Council that the FSS evidence will be provided to Council by a specified date.

Another metropolitan Council also requests proprietors to forward copies of their FSS evidence of training to be filed, however, will renew registration without conditions if this has not been fulfilled.

Finally, should an EHO sight records of training during an inspection or compliance check, some Councils accept this as appropriate. In some cases, the name, unit codes, training provider and date the course was completed on the report, otherwise a simple note that indicates training records were sighted at the time of the visit may be all there is on the file.

For the purposes of the project, where EHO's have noted training records as seen and subsequently satisfied or have requested evidence of training (during inspection, mail out to all food businesses) this has been documented. The number of files where EHO notes had indicated they were satisfied with training where evidence is not provided on file is 81 (2.7%). This includes:

- Evidence sighted during inspections,
- FSS currently teaching food safety at a training institute,

- 
- Tertiary qualifications either discussed or sighted,
  - Work experience,
  - Letters from a Senior Auditor verifying competency; and
  - New Zealand training certificates.

#### **4.6.1. Exemptions**

In 2002, the Government Gazette published an exemption under the Food Act 1984 for FSS requirements.<sup>4</sup> It stated that Class 2 premises that are used for events that raise funds solely for community or charity causes and not for personal gain, are exempt from having a food safety supervisor, otherwise required under Section 19GA of the Food Act 1984.

One Council interpreted 'events' to include weekly sporting events, such as local football and cricket club. All other Councils interpreted an event to a temporary stall or use of a Class 2 premises being a part of a larger one-off event, eg. school fete, weekend festival.

This Council also adopted the policy that the FSS is to undertake training that will be conducted by Council, if the FSS is not otherwise trained in food safety. The training provided by Council is not accredited and therefore competencies will not be issued. Should the FSS of these premises not accept the training Council is conducting, the FSS will then be requested to undertake training from a registered provider.

There were 47 premises that were considered exempt from FSS requirements involved in the project. This comprised 2.7% of the files with records. Fifteen (31.9%) did not have any records of training and the remaining 32 (68.1%) (all in the retail sector) had records present. All of the 32 records of training did not meet the minimum competency requirements for the retail sector. Thirty of these records were provided by an unaccredited training provider. The units of competency being taught were Hospitality units THHGH01A and THHBCC11A.

#### **4.7. Class 1 Premises**

Class 1 premises are described, as a food business where food is handled or sold that is high risk and ready to eat; and handled prior to sale; and to be consumed predominately by at-risk/vulnerable populations.

At-risk and vulnerable populations are children aged five and under, adults aged 65 and over, in-house patients of a hospital and the immunocompromised.<sup>5</sup>

All Class 1 premises must be 3<sup>rd</sup> Party Audited by an auditor registered with DHS at least every 12 months.<sup>6</sup> The auditor is also required to lodge a copy of any audit certificate to the registering authority in accordance with Section 19N of the Food Act 1984. For the purposes of the project, food premises information was only recorded where the registering authority is local Council's Health Departments.

Class 1 premises have been highlighted in this report due to the reliance of local Councils on the independent auditors role in these premises. Overall compliance of Class 1 premises depends on the auditing process to be thorough and encompass the requirements of the Food Act 1984.

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<sup>4</sup> Victorian Government Gazette No. G21, 23 May 2002

<sup>5</sup> Victorian Government Gazette No. G49, 6 December 2001

<sup>6</sup> Victorian Government Gazette No. S239, 21 December 2001

In the course of the project, 156 Class 1 premises were included in the data collection. This made up 5.2% of all files audited (Table 7).

There were 27 records sighted which had auditor reports attached, however, the question of whether the FSS was consistent with the licence application was left blank. Auditors are asked whether the FSS are appropriately trained in their sector and if no, to provide details.<sup>7</sup> Seven of these records then went on to say that the FSS was adequate within the report itself, ie providing details about the qualifications and training.

Of the 156 Class 1 business files handled, 65 (41.7%) had FSS training records provided to Council. Of those 65 records sighted, 29 (44.6%) had the independent auditor note that FSS training was adequate or consistent with the licence application. The number of records that actually met the minimum competency standards was eight (12.3%). All eight records had met earlier training (THHBCC11A) rather than the three Health competencies, HLTFS7A, HLTFS9A and HLTFS10A which has been the requirement since February 2004 (Table 8).

Of the remaining 91 (58.3%) files that were found not to have any evidence of training on file, 46 (50.5%) of these had the independent auditor note that FSS training was adequate or consistent with the licence application, although it is uncertain how the auditor actually determined this.

In four cases, the independent auditor had indicated that the FSS was competent, however, the training information provided to Council was not for the nominated FSS. For another Class 1 premises, the auditor did not address training in the report at all.

One Class 1 premises had used the FoodSmart template to develop their program and notes that the Council EHO had approved the use of in-house training from the premises for the FSS, rather than recognised competencies from an RTO.

**Table 7: Class 1 Premises**

Sector		No. Class 1 Premises	No. with Records	% Premises in Project	% Premises with Records	% Premises with Records in Project
<b>Health</b>	<b>Metro</b>	10	7	0.3	70.0%	0.3%
	<b>Rural</b>	10	4	0.3	40.0%	0.1%
	<b>Sub total</b>	<b>20</b>	<b>11</b>	<b>0.7%</b>	<b>55.0%</b>	<b>0.4%</b>
<b>Community Services</b>	<b>Metro</b>	116	49	4.1	42.2	1.8
	<b>Rural</b>	20	5	0.7	25.0	0.2
	<b>Sub total</b>	<b>136</b>	<b>54</b>	<b>4.9%</b>	<b>39.7%</b>	<b>1.8%</b>
<b>TOTAL</b>		<b>156</b>	<b>65</b>	<b>5.2%</b>	<b>41.7%</b>	<b>2.2%</b>

<sup>7</sup> Department of Human Services. Safe Food System Auditors Handbook, [www.health.vic.gov.au/foodsafety/auditing.htm](http://www.health.vic.gov.au/foodsafety/auditing.htm), p42.

**Table 8: Class 1 Premises & Minimum Competencies**

Sector		No. with Records	Met Min. Competencies	% Met Min. Competencies with Records from Class 1	% Met Min. Competencies from All Records
Health	Metro	7	2	28.6	0.07
	Rural	4	0	0.0	0.00
	<b>Sub total</b>	<b>11</b>	<b>2</b>	<b>18.2%</b>	<b>0.07%</b>
Community Services	Metro	49	4	8.2	0.14
	Rural	5	2	40.0	0.07
	<b>Sub total</b>	<b>54</b>	<b>6</b>	<b>11.1%</b>	<b>0.20%</b>
<b>TOTAL</b>		<b>65</b>	<b>8</b>	<b>12.3%</b>	<b>0.27%</b>

## 5. Summary

This report details the competencies of current Food Safety Supervisor's from information held on Council files at the time of this project. The data collected is not necessarily an accurate reflection of FSS competencies for all premises registered with the Councils. Of the files examined, 57% had some evidence of training on file. Of these, almost 43% of FSS had met the minimum units of competency for their respective food sector. The sector with the highest rate of compliance was the transport and distribution sector followed by hospitality, food processing, retail, health and community services sectors.

Of the remaining files that did not meet the minimum competencies, 78.5% listed other competencies. This may indicate that FSS do not know what competencies they are required to obtain for their respective food sector.

Of the records sighted, 93% of the training was provided by accredited training providers. The remaining training appears to be provided by unaccredited providers, the majority being in the retail and hospitality sectors. However, these results should be viewed with caution, as training providers were not required to provide an RTO code prior to 1 July 2002 and 37% of the training provided by seemingly unaccredited training providers was provided before this date.

Over 79% of the records of training from accredited training providers did not meet the AQF Implementation Handbook requirements. The reasons vary from minor to significant including competency names and codes missing or incorrect, no authorised signatory on the evidence and training provider contact details missing.

While the percentage of class 1 premises with records in the data collection was low (2%) it did highlight that independent auditors are noting that FSS training is adequate or consistent with the licence application when in the majority of cases it is not. Of the 65 records (41.7%), 29 (44.6%) had the independent auditor note the training as adequate but only 8 (12.3%) met the minimum competency standards.

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## Appendix 1: Data Collection Tool

**Council:**

**Type of Council:**

**Business Type:**

**Records:**

**If No Explain:**

**No of Records:**

**Same RTO:**

**Accredited Training:**

**Name of Training Provider:**

**Training Provider**

**Number:**

**Short Course:**

**Name of Training Course:**

**Higher Education Qual:**

**If Yes What Qual:**

**Whole Qualification:**

**If Yes What Qual:**

**Part of a Whole Qual:**

**If Yes What Qual:**

**Evidence of Training Provided:**

**If Other List:**

**Does evidence fill AQF requirements:**

**If No List Deficiencies:**

**Met all min competencies required:**

**If No, list competencies**

**met:**

**1<sup>st</sup> Description:**

**If additional, Description:**

**1<sup>st</sup> code:**

**If additional, Code:**

**2<sup>nd</sup> Description:**

**2<sup>nd</sup> code:**

**3<sup>rd</sup> Description:**

**3<sup>rd</sup> code:**

**Additional Comment:**

**Date:**

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## Appendix 2: Accredited RTO's with No Codes

<b>RTO Name</b>	<b>No.</b>
AQIS Training Services	1
Ascet TAFE	1
Australian Food Institute/Regency Institute of TAFE	1
Bendigo Regional Institute of TAFE (BRIT)	2
Box Hill Institute of TAFE	18
Chisholm Institute	6
Chisholm Institute / BRACE Education Training & Employment	1
Chisholm Institute / Otway Health and Community Services	18
Chisholm Institute / The Food Group	1
Colac Adult & Community Education Inc.	50
Food Operations Training	1
Food Quality Services Pty Ltd	2
Food Safety Training and Consulting (Melb CC)	15
Footscray Institute of Technology	1
Gordon Institute of TAFE	6
Goulburn Ovens Institute of TAFE	2
Homesglen Institute of TAFE	7
Kangan Batman Institute of TAFE	6
Kangan Institute of TAFE	1
Manningham City Council	1
McDonalds Australia	3
NMIT	16
Otway Health and Community Services	8
Park Orchards Community House Inc (POCHI)	1
Red Rooster	1
RMIT	1
South West Institute of TAFE	10
Spotless Group Limited	10
Strive Pty Ltd	1
Swinburne TAFE	29
TAFE NSW	1
Training & Quality Management Services (TQMS)	2
University of Ballarat	3
University of Ballarat TAFE Division	3
University of Melbourne	1
Victoria University of Technology	7
William Angliss Institute of TAFE	6
Woolworths Limited	2
<b>TOTAL</b>	<b>246</b>

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### Appendix 3: Unaccredited Training Providers

Training Provider	No.
Coles Myer Institute	36
ARAV Retail Institute	22
City of Melbourne	5
Manningham City Council	4
Australian Hotels & Hospitality Association Inc	3
Caltex Australia	3
JCS Food Hygiene Solutions	3
Serve-Safe Food Hygiene Training Service Pty Ltd	3
BRACE Education Training & Employment	2
Colac Adult & Community Education Inc.	2
Coles Myer Institute	2
Food Sense Hygiene Training & Food Safety Programs	2
Linda Wise & Associates	2
Northern Metro Region	2
Prime Skills Pty Ltd	2
SE Training	2
The Retail Confectionary & Mixed Business Association Inc. / Independent Fast Food Shops Association Inc.	2
A+ Hospitality Training	1
Adnet Group	1
Australian Food Hygiene Services	1
Bacchus Marsh Adult Education Centre Inc.	1
Bega Valley Shire Council	1
Biotest Laborities Pty Ltd	1
City of Darebin	1
Delaware North Australia	1
Food Safety Management Consultants	1
Gardner Merchant	1
Geelong Ethnic Communities Council Inc.	1
Gen'sis Solutions Pty Ltd	1
Glenelg Shire Council	1
Hales Institute	1
Hospitality Training Association College	1
Mayfield Education Centre	1
ProMicro Pty Ltd	1
Retail Group Training & Employment Limited	1
S.EU & Associates Pty Ltd	1
Sandybeach Community Co-operative Society Limited	1
Service Industry Advistory Group (SIAG)	1
Sodexho Food and Management Services	1
The Institute & Guild of Brewing	1

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<b>Training Provider</b>	<b>No.</b>
The Royal Society for the Promotion of Health	1
Winchelsea Community House	1
NZ training providers	1
<b>TOTAL</b>	<b>122</b>

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## Appendix 4: Type of Training by Sector and Region

Type of Training	Sector	Total within Sector	% Total within Sector	% Training	Metro	% Metro	Rural	% Rural
<b>Short Courses</b>	Hospitality	1018	66.7	59.5	825	66.3	193	68.4
	Retail	329	21.6	19.3	268	21.5	61	21.6
	Food Processing	101	6.6	5.9	82	6.6	19	6.7
	Health	11	0.7	0.6	7	0.6	4	1.4
	Community Services	48	3.1	2.8	43	3.5	5	1.8
	Transport & Distribution	19	1.2	1.1	19	1.5	0	0.0
	<b>TOTAL</b>		<b>1526</b>	<b>100.0%</b>	<b>89.3%</b>	<b>1244</b>	<b>81.5%</b>	<b>282</b>
<b>Part of Whole Qualification</b>	Hospitality	72	49.2	4.2	70	51.1	2	22.2
	Retail	57	39.2	3.4	50	36.5	7	77.8
	Food Processing	11	7.6	0.6	11	8.0	0	0.0
	Health	0	0.0	0.0	0	0.0	0	0.0
	Community Services	5	3.4	0.3	5	3.6	0	0.0
	Transport & Distribution	1	0.7	0.1	1	0.7	0	0.0
	<b>TOTAL</b>		<b>146</b>	<b>100%</b>	<b>8.6%</b>	<b>137</b>	<b>93.5%</b>	<b>9</b>
<b>Whole Qualification</b>	Hospitality	25	78.1	1.5	16	72.7	9	90.0
	Retail	3	9.4	0.2	3	13.6	0	0.0
	Food Processing	3	9.4	0.2	2	9.1	1	10.0
	Health	0	0.0	0.0	0	0.0	0	0.0
	Community Services	1	3.1	0.1	1	4.5	0	0.0
	Transport & Distribution	0	0.0	0.0	0	0.0	0	0.0
	<b>TOTAL</b>		<b>32</b>	<b>100.0%</b>	<b>1.9%</b>	<b>22</b>	<b>68.8%</b>	<b>10</b>
<b>Higher Education Qualification</b>	Hospitality	3	50.0	0.2	2	40.0	1	1
	Retail	0	0.0	0.0	0	0.0	0	0
	Food Processing	2	33.3	0.1	2	40.0	0	0
	Health	0	0.0	0.0	0	0.0	0	0
	Community Services	0	0.0	0.0	0	0.0	0	0
	Transport & Distribution	1	16.7	0.1	1	20.0	0	0
	<b>TOTAL</b>		<b>6</b>	<b>100.0%</b>	<b>0.4%</b>	<b>5</b>	<b>83.3%</b>	<b>1</b>
<b>TOTAL</b>		<b>1710</b>	<b>100.0%</b>		<b>1408</b>		<b>302</b>	