



CAMPBELL RESEARCH & CONSULTING

Evaluation of the Food Safety Supervisor Requirement of the Victorian Food Act 1984

Component 4: Stakeholder Understanding of the Food Safety Supervisor Role

A report prepared for

Department of Human Services Food Safety Unit

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Executive Summary

This report provides a summary of depth interviews and written submissions received from Registered Training Organisations (**RTOs**), Environmental Health Officers (**EHOs**), Food Safety Supervisors (**FSSs**), food business proprietors and industry associations in relation to the evaluation of the FSS Requirement of the Victorian Food Act (2001 Amendment).

Background

In May 2001 the Victorian Food Act (1984) was amended. The amendments require all Victorian food businesses to nominate someone to be their FSS when they submit their Food Safety Program (**FSP**).

The Food Safety Unit (**FSU**) of the Department of Human Services (**DHS**) commissioned a project to evaluate the effectiveness and appropriateness of the FSS requirements of the Food Act. The evaluation was divided into four distinct but complementary components, the first three of which investigated:

- Component 1: FSS Skills and Knowledge for Compliance
- Component 2: Competencies of FSSs Reported to Local Government Authorities
- Component 3: Food Safety Training Available in Victoria.

This report details the findings of Component 4: Stakeholder Understanding of the FSS Role.

Objectives

The objectives of Component 4 are to:

- Determine all stakeholders' understanding of the skills and knowledge required by FSSs broken down by stakeholder groups and food sectors.
- Determine the other issues involved in ensuring that FSSs can carry out their responsibilities with respect to the Food Act, including how they ensure others handle food safely.

Method

This report provides a discussion of 66 interviews and submissions analysed to meet the Component 4 evaluation objectives. The interviews were conducted by consultants employed by Campbell Research & Consulting (CR&C) and Culinary Perspectives to ensure that participant evaluation time was maximised across the four components. Stakeholder groups specified by the DHS-FSU were the target of the interviews and consisted of RTOs, EHOs, FSSs, proprietors and industry associations. The number of interviews conducted within each sector was as follows:

- 9 interviews and 3 email submissions with RTOs;
- 10 interviews with EHOs;
- 38 interviews with FSSs and food business proprietors; and
- 4 interviews and 2 email submissions from industry associations.

All interviews were conducted between April and June of 2005 using a combination of telephone and face-to-face interviewing.

Findings and Conclusions

There were no major differences in the findings identified between stakeholder groups. All groups expressed concern about issues related to:

- Training;
- Supervision and authority of FSSs;
- Record keeping;
- The role of the EHO; and
- Resources and information available to FSSs.

All stakeholder groups identified issues with training, including locating RTOs, identifying required competencies, industry relevance, accessibility and consistency.

It is clearly difficult for food businesses to identify appropriate training opportunities to meet the FSS Requirement. This is compounded by the use of varying terminology to describe the competencies required (e.g. courses, training packages, training codes, levels) and alternative competencies for different sectors (which may or may not be deemed equivalent by individual EHOs). EHOs and industry associations have also indicated these same difficulties in assisting food businesses to meet the training component of the FSS Requirement. In addition all stakeholder groups, including RTOs, identified different approaches to and interpretations of the delivery of the competencies which affect cost, duration, workplace relevance, assessment, resources and content.

There is a clear need for leadership in assisting food business and other stakeholders to identify and assess the relative merits of different ways to attain the competencies.

There is a general lack of clarity about the role of the FSS in different sectors of the food industry. Where it has become the responsibility of the training sector to clarify the role and responsibilities of the FSS, in some cases this has resulted in different interpretations of the role between providers.

All sectors identified supervision and authority as important aspects of the FSS role.

There was agreement across all stakeholder groups that the FSS needs the authority and supervisory skills required to monitor, direct and train staff to maintain food safety and implement the FSP. While these skills are not part of the present competencies, many RTOs are now delivering some aspects of the skill-set when they deliver the competencies. It was also clear from the FSS and proprietor interviews, and unpublished research being undertaken for DHS-FSU by Campbell Research & Consulting (2005), that many FSSs are already in positions of authority and have broader responsibilities for the monitoring, direction and training of staff. Imposing an additional supervisor competency on these FSSs does not appear to be warranted. While it is possible that greater awareness and transparency of the FSS role may discourage the appointment of less experienced FSSs, it is also likely that new entrants to the industry will continue to be appointed as FSSs, particularly in the establishment of new businesses where the role is fulfilled by a proprietor new to the food sector. These entrants would benefit from participation in a voluntary training program to provide skills in monitoring, supervising and training staff in food safety.

All stakeholder groups identified problems with record keeping, particularly for small business.

There was concern expressed by all stakeholder groups that the reporting requirements are arduous on small business, and seem particularly ‘over the top’ for low-risk businesses. There was some indication from FSSs and proprietors that not all businesses are complying with the recording requirements, though in many cases the procedures are still being adhered to.

All sectors identified the role of the EHO as important in supporting the FSS. However, consistency, availability, timeliness and the role of the EHO were seen as varying within and between local governments.

It was clear from all stakeholder groups that the EHO relationship is critical in encouraging well-meaning businesses to comply with food safety standards and in providing incentives (through sanctions or the threat of sanctions) to enforce compliance in non-compliant businesses. The capacity of EHOs to provide practical, workplace advice on food safety was seen as very important for food businesses. There was some concern from a minority of stakeholders that food businesses may be reluctant to ask advice of EHOs for fear of the application of sanctions.

Related to this, all sectors identified a lack of resources for FSSs (and RTOs), particularly industry specific information, content and direction.

Information from local government was seen as variable in terms of volume, quality, reliability and timeliness. Where businesses held membership to industry associations, these contacts were seen as good sources of information and advice. RTOs, private trainers and auditors were also used by some food businesses as additional sources of information, as were government departments and agencies such as DHS and Food Standards Australia New Zealand (FSANZ). While CR&C is aware that DHS is presently undertaking a broad review of food safety information resources, there appears to be a lack of industry specific information for FSSs. This perception may reflect issues of distribution and supply; that is, the materials may be available but not accessible to some businesses where distribution is mediated through intermediaries with different approaches and variable effectiveness.

Recommendations

- Recommendation 1:** It is recommended that DHS-FSU develops and publishes a guideline or checklist to assist food businesses to identify the competencies required for their sector and the relative merits of alternative approaches in delivering the competencies. This will also provide direction to the training sector and local government in interpreting the expectations of the Department in relation to best practice. (See also Recommendation 2.)
- Recommendation 2:** It is recommended that the DHS-FSU publishes a guideline about the role of the FSS. It should include industry case studies to assist current and potential FSSs to understand the role of the FSS and provide consistency of interpretation between RTOs. This resource could also provide proprietors with information on selecting an appropriate person to fulfill the FSS position.
- Recommendation 3:** It is recommended that the acquisition of supervisory competencies should remain voluntary. This point could be linked to Recommendation 2 in identifying a need for less experienced FSSs to undertake supervisory training and Recommendation 1 in assisting candidates to identify providers that offer the training most appropriate to their sector, level of experience and prior learning.

- Recommendation 4:** It is recommended that the DHS-FSU considers alternative methods to reduce the recording burden on small business. One option would be to accredit compliant businesses to undertake weekly or exception reporting.
- Recommendation 5:** It is recommended that DHS reviews its information resources specifically targeted to FSSs and its methods of distribution to ensure that all Victorian FSSs are readily able to access information about food safety relevant to their sector of the industry. This may include wider promotion of the role of the DHS-FSU, online information and opportunities to order hardcopy resources.

Reading This Report

Acronyms Used in This Report

CATI	Computer Assisted Telephone Interviewing
CALD	Culturally and Linguistically Diverse
CR&C	Campbell Research & Consulting
DHS	Department of Human Services
DHS-FSU	Department of Human Services - Food Safety Unit
FSANZ	Food Standards Australia and New Zealand
FSP	Food Safety Program
FSS	Food Safety Supervisor
FSU	Food Safety Unit
HE	Higher Education
ITAB	Industry Training Advisory Boards
NESB	Non-English Speaking Background
PRG	Project Reference Group
RPL	Recognition of Prior Learning
RTO	Registered Training Organisation

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Disclaimer

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1. Introduction

This report provides a summary of depth interviews and written submissions received from Registered Training Organisations (**RTOs**), Environmental Health Officers (**EHOs**), Food Safety Supervisors (**FSSs**), food business proprietors and industry associations in relation to the evaluation of the FSS Requirement of the Victorian Food Act (2001 Amendment).

1.1 Background

In May 2001 the Victorian Food Act (1984) was amended. The amendments require all Victorian food businesses to nominate someone to be their FSS when they submit their Food Safety Program (**FSP**). In February 2002, Food Standards Australian and New Zealand (**FSANZ**) brought in the requirement for all food businesses to ensure their food handlers have appropriate skills and knowledge with respect to food safety and hygiene.

Section 19G of the Victorian Food Act 1984 requires that a FSS:

- Knows how to recognise, prevent and alleviate the hazards associated with the handling of food at, or from, the premises;
- Has met an appropriate food safety competency standard for the business type relevant to the premises; and
- Has the ability and the authority to supervise other people handling food at, or from, the premises and ensure that handling of food is being done safely.

Food businesses are also required to give written details of the name and the qualifications or experience of their FSS to the local government authority:

- Within seven days of a request; or
- When they first register, re-register, or transfer registration of the food business.

FSSs must have the required competencies for the type of food business in which they work. There are a number of minimum competency standards for FSSs, which have been specified by the Department of Human Services-Food Safety Unit (**DHS-FSU**) after consultation with Industry Training Advisory Boards (**ITABs**) and other relevant stakeholders. Titled National Training Package Units of Competence (**competencies**), they are specified according to food business type.

Over the last four years:

- A number of studies have been undertaken to determine the level of skills and knowledge of the workforce in relation to food hygiene. The studies identified the following:
 - In general theoretical knowledge of food safety issues was good but the translation of these into sound hygiene practices in the workplace was inadequate.
 - There was a gap between the food safety skills and knowledge of the FSS and the other food handling staff at establishments (younger, less educated and casual junior staff had poorer food safety skills and knowledge than the FSSs).
 - There was poor understanding and implementation of food safety procedures relating to temperature control, storage of foods and protection of food from contamination.
 - A significant number of businesses did not comply with reporting procedures required in their FSP with regard to temperature control.

- There have been a range of changes in the training sector, including the development of a number of courses and training options for staff seeking food hygiene and FSS training. These have caused difficulties for:
 - People intending to train as FSSs.
 - Businesses and EHOs who have responsibility for ensuring FSSs have actually met the required competency standards.

The results of the research and the changes in training have raised questions among stakeholders regarding:

- The role of FSSs;
- FSSs' understanding of the Food Act;
- The extent and type of training required; and
- Whether current training and duties of FSSs are effective in ensuring establishments meet Food Safety Standards.

The DHS-FSU commissioned this project to evaluate the effectiveness and appropriateness of the FSS Requirements of the Food Act. The evaluation was divided into four distinct but complementary components:

- **Component 1:** FSS Skills and Knowledge for Compliance
 - Determine the skills and knowledge provided in the specified minimum competency standards for FSSs.
 - Determine the issues involved in ensuring that FSSs obtain and maintain the skills and knowledge.
- **Component 2:** Competencies of FSSs Reported to Local Government Authorities
 - Determine the competencies that current FSSs provide to their local council in the range of food sectors.
- **Component 3:** Food Safety Training Available in Victoria
 - Determine what food hygiene training RTOs are currently offering and how they are offering it in terms of specific training for FSSs, recognition processes for prior skills and knowledge, and how best the DHS-FSU may provide information about this training to all stakeholders.
 - Determine the Higher Education (**HE**) qualifications which would meet the FSS Requirement and the method of recognition a person would undergo to ensure they have the skills and knowledge to be a FSS.
- **Component 4:** Stakeholder Understanding of the FSS Role
 - Determine all stakeholders' understanding of the skills and knowledge required by FSSs as broken down by stakeholder groups and food sectors.
 - Determine the other issues involved in ensuring that FSSs can carry out their responsibilities, including how they ensure others handle food safely.

This report, prepared by Campbell Research & Consulting, addresses Component 4
– *Stakeholder Understanding of the Food Safety Supervisor Role.*

1.2 Profile of a Food Safety Supervisor

In conducting research with FSSs, it is important to have an understanding of the characteristics and background experience of FSSs across the food sector. CR&C is currently conducting a project for DHS entitled *Evaluation of Food Safety Information Resources & Identifying Information Needs of Food Businesses* (Campbell Research & Consulting, 2005). The implementation of that project has involved the collection of data which can be used to provide a profile of FSSs working in Victorian food businesses. This section provides a summary of the professional and personal demographics of FSSs collected for the food safety information resources project.

1.2.1 Method

The data for that project was collected as part of a Computer Assisted Telephone Interview (**CATI**) survey of FSSs working in randomly selected Victorian food businesses in regional Victoria and metropolitan Melbourne. The interviews lasted an average of 12 minutes and were conducted in May 2005. In total, 365 FSSs were included in this survey. Data was weighted to reflect food sector sizes using the number of listings available through the electronic business telephone directory for each food sector. The number of FSSs interviewed in each sector of the food industry was as follows:

- 208 from hospitality services (such as restaurants, cafes, takeaways, food vans);
- 25 from retail services (such as convenience stores and supermarkets);
- 52 from manufacturers (such as businesses that add value to raw produce); and
- 80 from high-risk services (such as aged care services, children's services, hospitals).

1.2.2 Industry Experience and Position

The FSSs interviewed demonstrated a high degree of industry experience with an average of 13 years experience in the industry:

- One quarter (26%) had worked in the food industry for less than five years;
- One quarter (24%) had worked in the food industry between five and ten years; and
- The remaining half (50%) had worked in the food industry for 10 years or more.

At the time of interview, the FSSs interviewed had worked at their current place of employment for an average of seven years:

- Six in ten (58%) had worked at their current place of employment for less than five years;
- Two in ten (19%) had worked at their current place of employment for between five and ten years; and
- A further two in ten (23%) had worked at their current place of employment for more than ten years.

In addition to being the FSS, most FSSs held another position at their place of employment, most commonly:

- The owner or proprietor (38%); or
- A manager (34%).

Two in ten FSSs (21%) held another type of position. Less than one in twenty (4%) were dedicated solely to the position of FSS.

Almost all FSSs (85%) handled food as part of their duties, while a minority (15%) had no direct contact with food.

FSSs were responsible for safe food practices for an average of twenty staff at the site where they worked at the time of interview:

- One third (35%) were responsible for four or fewer staff;
- One quarter (26%) for between five and ten staff;
- One fifth (18%) for 11 to 20 staff; and
- One fifth (20%) for more than 20 staff.

1.2.3 Food Businesses

Two thirds (67%) of FSSs worked in ‘stand-alone’ food businesses, while the remaining third (33%) worked in businesses that were part of larger organisations as follows:

- Franchises (12%);
- Chains (14%); and
- Healthcare groups (7%).

The majority of FSSs worked in businesses where English was the sole language used to communicate in the workplace (85%), while a minority (15%) worked in businesses where languages other than English were spoken in the workplace.

Almost all FSSs (97%) worked in food businesses that had a FSP in place, while a minority (3%) reported that no FSP had been implemented. Six in ten (59%) FSSs had been involved in the development of the FSP at the business where they worked at the time of interview, while the remaining 41% (including FSSs who joined the business after the development of the FSP) had not been involved.

2. Objectives

The objectives of Component 4 were to:

- Determine stakeholders' understanding of the skills and knowledge required by FSSs to comply with the requirements; and
- Determine the other issues involved in ensuring that FSSs can carry out their responsibilities to ensure their establishment complies with the Food Act.

The tasks specified for Component 4 were to:

- Investigate stakeholders' understanding of the roles and responsibilities of the FSS;
- Investigate the enablers and barriers for FSSs to undertake their roles and responsibilities under the FSS Requirement of the Food Act;
- Investigate and document the methods/strategies used in each food sector by FSSs to ensure that the handling of food is being done safely at their premises and the range of issues arising; and
- Report on the findings, including the issues arising and make recommendations for action.

3. Method

This report provides the outcomes of 66 interviews and submissions analysed to meet the Evaluation objectives of Component 4. The interviews were conducted by consultants employed by CR&C and Culinary Perspectives to ensure that the impact on participant time was minimised across the four components of the Evaluation. Stakeholder groups specified by the DHS-FSU were the target of the interviews and consisted of RTOs, EHOs, FSSs/ proprietors and industry associations. The number of interviews conducted within each group was as follows:

- 9 interviews and 3 email submissions with RTOs;
- 10 interviews with EHOs;
- 38 interviews with FSSs and food business proprietors;
- 4 interviews and 2 email submissions with industry associations.

All interviews were conducted between April and June of 2005 using a combination of telephone and face-to-face interviewing (see Table 2). The combination of face-to-face and telephone interviewing was used to ensure maximum value of the project fees. Whenever a participant requested a preference for either a face-to-face or a telephone interview the research team accommodated that preference. Working in association with the DHS-FSU and the PRG, interview guides were developed for each industry sector (see Appendices 1-3).

Food Sector	Regional			Metropolitan			Inter-state	Total
	Face to face	Telephone	Email	Face to face	Telephone	Email		
RTOs	1	1	1	4	3	2	-	12
EHOs	-	3	-	-	7	-	-	10
FSSs	22	-	-	15	-	-	1	38
Industry Associations	-	-	-	1	3	2	NA	6
Total	23	4	1	20	13	4	1	66

Interview participants were selected from a range of industry backgrounds to ensure that a cross-section of views and experiences were included in the project. The researchers directly recruited participants for depth interviews using a combination of industry contacts, referrals and the *Yellow Pages*. Additional information about the recruitment of participants for each industry sector and the characteristics of the sample is included in the relevant chapters of this report.

Interview participants were asked common questions in relation to the following areas:

- Perceptions of the role and responsibility of the FSS;
- Skills and knowledge required of an FSS;
- Incentives and barriers to the implementation of the FSS Requirement; and
- Training and resources to support the FSS.

Additional questions were asked of each specific industry sectors where appropriate.

3.1 Using Qualitative Research

The reader is reminded of the customary caution which accompanies qualitative research of this nature. Qualitative data differs from quantitative data in that it is not designed or intended to be numerically based, or generalised to the broader population. Qualitative research seeks to develop insight and direction rather than provide absolute measures. As such qualitative research does not seek to make global or definitive statements about the opinions of participants or the topics under discussion.

Given the sample size, the special recruitment methods adopted and the objectives of the study, it is clearly understood that the work is exploratory in nature. There are no statistical degrees of confidence and findings are not applicable to any larger population. The findings should be viewed as a frame of reference and as directional in nature.

4. Registered Training Organisations

This chapter provides a summary of the nine interviews conducted with RTO staff involved in the delivery and management of programs offering minimum competency standards for FSSs. These interviews were conducted using a combination of telephone, and face-to-face interviewing. The average interview length was of less than one hour. Three email submissions were received making a total of 12 overall.

Interviews were conducted with RTO staff from both regional and metropolitan areas, in the private and public sectors (see Table 3).

	Regional	Metropolitan	Total
Public (including TAFE divisions of universities)	2	4	6
Private	1	5	6
Total	3	9	12

Within private RTOs the interviews were more likely to be conducted with senior staff involved in the management of the organisation or the relevant program area (most of whom also maintained a direct delivery role). Participants from private RTOs described their positions in the organisation with titles such as CEO, Director, Principal Consultant. In public RTOs the interviews were more likely to be conducted with a Program Coordinator or Trainer. In part, this reflects the relative size of the organisations. The majority of participants were involved in direct program delivery.

4.1 Role of the Food Safety Supervisor

RTO staff were asked to provide their perceptions of the roles and responsibilities of the FSS. At a general level, the FSS was considered to be responsible for the **management of food safety** on the premises.

“The core role of the Food Safety Supervisor is the management of food safety to ensure people are doing the right thing.” (Metropolitan public RTO)

“Ability to run a food service safely...” (Metropolitan private RTO)

This role was often seen as involving a **quality assurance or continuous improvement process**, with the FSS responsible for assessing risks at different points in the supply and distribution chain.

“Ensure all food is safe at all stages.” (Metropolitan private RTO)

“Use continuous improvement practices.” (Metropolitan private RTO)

Similarly, management of food safety was also commonly seen as being implemented by the FSS through the supervision of staff. Almost all participants mentioned **staff supervision and monitoring** as one of the main functions of the FSS.

“The Food Safety Supervisor Requirement has formalised the supervision role.” (Metropolitan private RTO)

“The role of the Food Safety Supervisor is all about monitoring. Supervising people - customers, staff, EHO relationships, business practices and legal issues.” (Metropolitan private RTO)

“We describe supervision as part of the role of the Food Safety Supervisor ... We encourage Food Safety Supervisors to train, coach and mentor other staff.” (Metropolitan private RTO)

There was also general agreement that it was important for FSSs to have the **authority** to supervise staff. In cases where the FSS was the proprietor this was seen as straightforward. In other cases, the personality and/ or industry experience of the FSS was seen as important.

“Sometimes a Food Safety Supervisor comes to us who has no authority within the organisation. We send them back to the employer. They are in a difficult legal position when this happens.” (Metropolitan public RTO)

“They need to be able to work with the proprietor (if they are not the proprietor). Food Safety Supervisors can’t do the job without the support of the owner. Need both ability and authority – sometimes have one and not the other.” (Metropolitan private RTO)

“A lot comes down to personality. You have to be assertive and self confident.” (Metropolitan public RTO)

“Where there is a lot of resistance to change, the candidates are not so well suited and maybe do not see the big picture and are subject to a lot of extra pressure as these duties add to their normal workload.” (Regional private RTO)

Related to the supervision and monitoring of staff, was the need for the FSS to be able to **train staff** in safe food handling practices. In some cases this was seen as an ‘information transfer’ role while more commonly participants referred to a need for on-the-job training.

“Ability to...train staff correctly.” (Metropolitan public RTO)

“I see the Food Safety Supervisor as a leadership and professional development role. They get the knowledge and plough it back into the workplace.” (Metropolitan private RTO)

“We encourage Food Safety Supervisors to use observation to ensure that staff are all demonstrating the type of basic practices you see in level one. They need to remind people and train them on the standards required.” (Metropolitan public RTO)

Conversely, one participant questioned the ability and need for competencies to include training skills.

“I think it sounds like self interest from RTOs when they say Food Safety Supervisors need formal training like train the trainer...It makes me uncomfortable...Because we do it to make it seem special but most people have an element of this in their jobs anyway...and practically, how much are they going to learn in a few hours?” (Metropolitan public RTO)

The FSS was also commonly described as the person responsible for **implementing the FSP** and managing issues associated with the FSP such as EHO, supplier and customer relationships in relation to food safety. In addition to knowing the FSP and the risks within the business, FSSs were seen as responsible for the maintenance of records and reporting systems.

A secondary theme underlying other areas of the discussion was **duty of care and legal issues** associated with the role of the FSS. There was a common concern that the FSS position has a legal responsibility that is often not understood by people accepting the position. Indeed, there was a range of different, conflicting perceptions held by the RTO staff about the legal responsibility of the FSS.

Several RTO staff mentioned that the programs focused on the legal responsibilities of the FSS position, while other staff commented that if the potential legal responsibilities were understood then no one would be willing to take on the FSS position.

“I don’t think that people get that it is a big legal responsibility...most take it on without any additional pay. It’s just another function of their job.” (Metropolitan private RTO)

“At [large retail and entertainment complex] the Food Safety Supervisors have to sign a contract that says they are liable...and if they don’t sign, they aren’t employed.” (Regional public RTO)

One participant commented on encouraging FSSs to keep training records as a form of evidence of the implementation of their role in the case of a legal dispute. Other RTO staff commented on FSS having a ‘direct duty of care’ or being ‘legally in the firing line’ in the case of a public health issue. Conversely, other participants ascribed this role to the proprietor.

“We recommend that Food Safety Supervisors keep records of what the training staff have done as part of the evidence that they are implementing their role...protection in case something goes wrong.”

(Metropolitan private RTO)

Participants commonly believed that FSSs have a better understanding of the legal responsibilities of the position as a result of participating in training.

“Food Safety Supervisors have a clear duty of care and are very aware of the legalities of the position or role after training” (Metropolitan private RTO)

4.2 Implementation of the Food Safety Supervisor Role

There was general agreement that the FSS Requirement had raised awareness of food safety. New businesses were seen as more readily accepting of the requirement than were established businesses. However, several participants commented that the attitudes of established businesses were changing over time and in response to training. It was commonly considered that the FSS required the support of management and staff to implement their role.

“Training is having a big impact. Most people don’t think they need training. They do it because it is a legal requirement to get a qualification. Some people want to improve their knowledge. This changes during training when they realise at the end what they didn’t know. They may be there under protest in the start but in the end they see the value.” (Metropolitan public RTO)

“...depends on the attitude of the Food Safety Supervisor and the support they get at the workplace. It is always hard to implement change and we often experience resistance when attempting to do so. The duties of a Food Safety Supervisor are usually in addition to their normal duties and may represent a lot of pressure and stress in the initial period.” (Regional private RTO)

Rather than considering the FSS Requirement to be part of a quality assurance or improvement process, there was concern that training is undertaken to comply with the legislation. This focus on the attainment of a competency, rather than emphasising the outcome desired from the competency (such as improved food handling practices and processes) was seen as driving this compliance-driven, ‘tick-a-box’ mentality. However, there was also some consideration that businesses with this attitude were ‘at least’ participating in training.

“There is a lack of awareness or understating of the leadership role of the Food Safety Supervisor. The system is not looking for change and quality improvement but compliance.” (Metropolitan private RTO)

“Many of the people who do our course will never be supervisors. It’s not just a matter of training. The level of personal responsibility is not high. One way or another, many people are compelled to do the course (by law, by employers, by family).” (Metropolitan public RTO)

“Food Safety Supervisors know their role but they don’t act on it. People comply with the basic level they have to, the basic legal requirement, and that’s about it.” (Metropolitan private RTO)

“EHOs are enforcing box ticking rather than real compliance.” (Metropolitan private RTO)

“A proportion of people we train are not competent. We open their eyes a little, make them more conscious of what they should be doing. But some just don’t get it. We push them as far as we can to get them over the line – oral assessments, resitting tests, that sort of thing.” (Metropolitan private RTO)

There was a perception that while the role of the FSS was initially seen as a compliance issue, many participants believed that training and exposure to the system were changing this perception. New businesses were seen as particular beneficiaries of training.

“People came with a lot of negativity initially. But much of this has changed. There has been a big shift really. We are more positive too. We can change what people do in their workplaces. And people are more confident that they have protection, that they have covered their duty of care.” (Metropolitan private RTO)

“New businesses are much more aware and take it much more seriously.” (Metropolitan private RTO)

“Generally training is only to get a piece of paper to get a job or open a business.” (Regional private RTO)

Several participants mentioned the need for tougher enforcement and publication of sanctions to ensure compliance. While most food businesses were seen as well intentioned, a minority were seen as requiring the threat of punitive action to ensure compliance.

“The laws need to be tougher on owners. We need a consistent approach and application of the laws.” (Regional private RTO)

“Some businesses need to know about the Food Order to make them take food safety seriously.” (Metropolitan public RTO)

Related to this issue of compliance, many participants considered the role of the EHO to be important in assisting the FSS to implement their role. The EHO was seen as having the potential to provide work-based advice and information, and to enforce compliance. However, there was also recognition of the restraints on EHO time and concern that changes in the role of the EHO had resulted in FSSs focusing on evidence of compliance rather than good practice.

“Enforcement is a big issue. EHOs previously looked at structure now the paradigm has shifted to practices. It is very judgement based. Very hard to get consistency. EHOs are not trained to provide professional judgements.” (Metropolitan private RTO)

“Implementation is wrapped up in compliance. It is not seen as a continuous improvement approach. People want to be able to tick a box rather than think about the broader issues. They just want a sheet they can give to the EHO.” (Metropolitan private RTO)

Similarly, there was some concern that FSSs are not aware of their role. RTOs were seen as having a function in educating FSSs on their role within the food business. Related to this, the position of the FSS was sometimes seen as lacking recognition with respect to organisational and salary structures.

“Most see it as a requirement. They do not appreciate that Food Safety is about risk management.” (Metropolitan private RTO)

“Some people think they know the role but don't have a clue.” (Metropolitan public RTO)

“The level of understanding depends on the RTO and their training. I suspect that until you tell them explicitly, they don't understand their role.” (Metropolitan public RTO)

“There should be a job description for a Food Safety Supervisor so they know what is expected of them.” (Regional private RTO)

“We need to educate management on the role of the Food Safety Supervisor.” (Metropolitan private RTO)

“There is no extra pay for the Food Safety Supervisor. It is a big commitment and responsibility, usually with no financial benefit.” (Metropolitan private RTO)

Concerns were raised regarding cases where the FSS either did not work on the premises or had no authority to influence workplace practices or supervise staff. This was identified as being particularly relevant where proprietors with language problems had relatives or friends undertake training without a formal role in the business. Many participants expressed concern about children of proprietors from culturally and linguistically diverse backgrounds undertaking FSS training to meet the requirement.

The issue of supervision also drew discussion in relation to the implementation of the FSS role. There was concern that the competencies were not adequate, particularly in areas related to supervision,

monitoring and training of staff. Inclusion of these areas in delivery of the competencies was undertaken by some RTOs. This was generally considered to be an important factor in the ability of the FSS to implement their role.

“The competencies do not address the issue of supervision.” (Metropolitan public RTO)

“DHS set the bar too low. The minimum standards are too low. Food Safety Supervisors need supervision skills to monitor staff.” (Metropolitan private RTO)

“Competencies required by DHS are too low.” (Metropolitan private RTO)

“There is also a need for training in supervision.” (Metropolitan public RTO)

“Supervision is not a requirement for Food Safety Supervisor competencies. We do this in our second day, but it would be uncompetitive cost wise to put it in the first day of training.” (Metropolitan private RTO)

It was acknowledged that in many cases the FSS was also the business proprietor so there was no issue of the authority to supervise staff. Similarly, in large businesses it was also generally accepted that the role of the FSS was part of the quality processes and the authority was recognised. However, in other cases, the FSS was seen as lacking the authority and skill to supervise and train staff.

“Food Safety Supervisor may not have the time or resources or skills to train other staff. There is no support or requirement for people to show evidence of that.” (Metropolitan private RTO)

“They need to be training the staff.” (Regional public RTO)

A minority of participants commented on a need for the FSS to have the support of the staff team to assist in the processes and recording required for the implementation of the FSP.

“They need the ability to delegate responsibility to other staff.” (Regional private RTO)

“The Food Safety Supervisor needs to be supervising other staff in monitoring and recording. Food safety shouldn’t just be the role of the Food Safety Supervisor...” (Metropolitan public RTO)

4.3 Skills and Knowledge of a Food Safety Supervisor

From the RTO perspective, there was a high degree of consistency between the role of the FSS and the skills and knowledge required of an FSS. The ability to supervise and monitor staff, to identify and rectify risks and a basic knowledge of food safety were the most commonly mentioned areas of skill and knowledge required by FSSs. Other areas mentioned by RTOs included:

- Food safety skills
- Understanding of legal issues
- Maturity/ common sense/ personality
- Temperature monitoring/ calibrating thermometers
- Training other staff
- Record keeping
- Implementing the FSP
- Understanding the needs of the enterprise
- Industry experience

4.4 Resources

All the staff interviewed reported that the RTO provided hard copy resources for FSSs to take back to their work environment and use as a reference. The use of the DHS Food Safety Template was also commonly used as a training tool. Most RTOs also provided some form of information package, with either a list of website links or hard copy resources from government.

“We produce our own materials. There is not a lot of good stuff out there. We market our materials and customise them to the business. We have developed a portfolio approach. We provide our training manual and package it with other materials from DHS, the Food Safety Unit, and we give them a list of other sources of information.” (Metropolitan private RTO)

Generally, participants commented on a lack of information for FSSs and problems with the pitch of information. Written materials were often described as too text based, using too much jargon and lacking practical information. There was seen to be a need for an FSS job description, more posters and materials setting information out in either plain English or pictorially. Some participants also requested information on legal issues and ‘following the forensic trail’ to identify how outbreaks can be traced back to businesses.

“Lack of practical resources to provide knowledge and prompt behaviour (like posters). Hard to get information at a simple level for people with low literacy or from a NESB [sic].” (Metropolitan private RTO)

Some RTO staff also commented on a need for common materials for RTOs to provide a standard approach to information provision.

“There is a problem with different standards between RTOs. It would be really helpful if there were trainers’ guidelines so that a consistent message is delivered.” (Metropolitan private RTO)

“We need better information - a common bottom line that we deliver to. How many hours is adequate? We need some benchmark. Is simulation acceptable?” (Metropolitan public RTO)

4.5 Other Issues

The competency requirement was generally considered ‘difficult for industry to negotiate’. Participants commented that it is difficult for businesses to identify which competencies are needed for different industries and where these competencies can be obtained. There was also seen to be discrepancies with EHOs’ understanding of the system and Councils’ willingness to accept competencies from across sectors (retail and hospitality were mentioned as being similar by several participants).

Businesses were seen as confused by the language used and lacked understanding of the difference between terms such as units, competency and courses.

“People don’t understand that there is no Food Safety Supervisor course. Even EHOs act like there is a Food Safety Supervisor course.”

“Some EHOs don’t understand that a Food Safety Supervisor course does not exist. We have had to create a certificate that does not exist because EHOs don’t understand that. I would take hospitality and retail to be equivalent, but some EHOs won’t.” (Metropolitan public RTO)

“EHOs are locked into this level 1, 2, 3 stuff.” (Metropolitan private RTO)

“Levels 1, 2 and 3 don’t exist anymore. But a lot of this language is still used. It is really confusing to the market place.” (Metropolitan public RTO)

5. Environmental Health Officers

This section provides a summary of the 10 interviews conducted with EHOs to provide an understanding of their perception of the roles and responsibilities of the FSS Requirement.

5.1 Method

In April 2005 DHS-FSU disseminated an email to EHOs inviting their participation in Components 3 and 4 of the Evaluation of the Food Safety Supervisor Requirement of the Victorian Food Act 1984. Interested EHOs contacted the consultants directly. Using this method, ten EHOs were recruited to participate in telephone interviews for Component 4 of the Evaluation. The interviews lasted between 15 and 50 minutes. All interviews were conducted between April and May of 2005. Three interviews were conducted with EHOs from rural councils and seven with EHOs from metropolitan councils.

The industry experience of EHOs interviewed in this aspect of the project ranged from 18 months to 30 years.

5.2 Role of the Food Safety Supervisor

In identifying the role of the FSS, most EHOs directly referred to the implementation of the Food Safety Program in the business. While FSP implementation was a strong expectation of the role of the FSS, there was a general consensus that many FSSs were not familiar with the business's FSP.

"The role of the Food Safety Supervisors is to make sure that the Food Safety Program is operating properly and to make sure that staff understand their roles." (Metropolitan council)

"Simple. They are the main person responsible for the Food Safety Program." (Metropolitan council)

"I saw it as being able to help people to do the Food Safety Program. How to do record sheets." (Rural council)

FSSs were also commonly identified as being the primary source of information for other staff on food safety and for training other people in the kitchen on safe food handling techniques. Sometimes this aspect of the role was seen as being implemented through a mentor arrangement or through a direct supervision and guidance role.

"The Food Safety Supervisor is a conduit of information on food safety." (Rural council)

"...need to be a mentor. Particularly with younger people." (Metropolitan council)

"They can directly intervene when they see something wrong." (Metropolitan council)

"The role of the Food Safety Supervisor is to have the appropriate skills and knowledge to provide information to other staff in the kitchen – not just the people involved in food handling, everyone...a band member can walk into the kitchen." (Metropolitan council)

While the legal perspectives of the role were not a specific focus of these interviews, there was a general perception that the role carries considerable responsibility and importance.

Other roles ascribed to the FSS included understanding the point in the food supply chain where hazards can occur (including warehousing and distribution – not just point of business issues) and being the designated person for all complaints about the business.

5.3 Skills and Knowledge of the Food Safety Supervisor

There was a general perception by EHOs that the skills required by FSSs were acquired through industry experience, with formal training providing a theoretical framework.

A core skill EHOs required of FSSs was the ability to train other staff. While there was a general belief that training courses provided training in food handling theory, a focus on the ability to train other staff was generally seen as lacking.

“They (Food Safety Supervisors) need to have good skills to train people in food safety and handling. I don’t get the impression that RTOs teach Food Safety Supervisors to train others.” (Metropolitan council)

An underlying assumption was that the FSS would have sound food handling practices, and hence act as a role model or mentor to other staff.

Related to the ability to train other staff, it was also commonly mentioned that FSSs required well-developed ‘people skills’. People skills were seen as particularly important in dealing with younger staff and casual employees, while skills in change management and negotiation were seen as important when dealing with proprietors or senior kitchen staff. In some cases, EHOs considered that people skills necessitated the need for industry experience.

Other skills the FSS was seen as requiring included:

- Business knowledge;
- Ability to identify potential hazards to the safety of food;
- Ability to complete recording forms;
- Ability to calibrate a thermometer;
- Basic literacy (in English or another language); and
- Change management skills.

Generally, in relation to the skills and knowledge of FSSs, there was a strong perception the RTOs are not equipping students with the skills they need to fulfil the FSS Requirement.

There was seen to be a considerable difference in skills and knowledge between FSSs in the manufacturing and retail sectors. FSSs in the manufacturing sector were described as holding tertiary qualifications in relevant areas and demonstrating a high degree of professionalism in their conduct of the FSS Requirement. Several EHOs commented on the perceived incongruence of requiring an FSS with relevant tertiary qualifications to undertake further training. It was considered that Recognition of Prior Learning (RPL) was a difficult and often expensive process for these candidates with many people opting instead to do the additional training.

In the retail and hospitality sectors, FSSs were considered to be less likely to hold graduate qualifications. Concerns were expressed about basic literacy (in any language) and the transient nature of the workforce in those sectors.

5.4 Implementation of the Food Safety Supervisor Role

There was a general appreciation that the FSS Requirement had increased awareness of food safety in the industry.

“The concept is really good if it is applied.” (Metropolitan council)

“It has raised awareness that training is required.” (Rural council)

EHOs suggested a range of factors that impacted on the successful implementation of the FSS Requirement.

The implementation of the role of the FSS was generally considered to reflect the culture of the business and the skills of the FSS. Where the culture of the business supported good practices in food safety, the role of the FSS was also supported.

“Good businesses implement the requirements and do their reporting. Bad businesses are still non-compliant.” (Metropolitan council)

There was also general agreement that the success of the role of the FSS largely depends on the credibility of the individual doing the role. Where the FSS is a person with a high degree of credibility within the business the authority of the position is more likely to be respected.

Some EHOs thought that proprietors could often be in the best position to fulfil the FSS role as they have the authority to direct other staff and change the business culture. However, where the proprietor was not ‘hands-on’ EHOs commented on concerns about their capacity to fulfil the FSS role.

There was some ambiguity about the extent of the legal responsibility of the FSS in the event of an incident. While some EHOs considered the FSS to have minimal legal responsibility, other EHOs considered the role of the FSS to have considerable (or potential) legal implications for the employee undertaking the role.

“I tell them they are not responsible for things beyond their control... There should be some brochure that explains the proprietor is responsible... people won’t take it on if they think they are legal responsible.”
(Rural council)

“It is a very important position... I don’t think we prepare them [Food Safety Supervisors] for the legal implications of their role.” (Rural council)

“Precedent law will determine the level of legal responsibility.” (Metropolitan council)

“If Food Safety Supervisors knew the legal implications of their role no one would take it on.”
(Metropolitan council)

Most EHOs raised concerns with training and training providers. There was concern that the quality of training varies considerably between RTOs. Program duration, cost, practical application and assessment were seen as the key areas that differentiated courses. There was concern that FSSs can be qualified but not be familiar with their FSP or the reporting requirements.

Concerns with the content of courses were closely related to this issue. The lack of practical focus and education in workplace training approaches were key areas of concern.

Course accessibility was also seen as problematic now that the initial drive to qualify FSSs has passed. Some EHOs mentioned waiting times of up to four months from the time of enrolment for FSSs to actually start their training. This was identified as particularly difficult in regional Victoria.

Similarly, there was concern over the delays in issuing statements of attainment at the completion of courses. Delays were particularly noted where students were required to submit ‘homework’ for assessment after the completion of coursework.

The requirement to have the FSS trained in food safety has led to deskilling of other staff. If the FSS is not proficient in skills training or sufficiently empowered to undertake their role then other staff potentially have less access to skills and knowledge about food safety than experienced previously. Some EHOs suggested that all staff involved in food handling should have some basic training requirement in food safety.

Some EHOs also reported difficulty in determining what units of competency or courses were acceptable to fulfil the FSS training Requirement. It was also noted that it can be difficult to maintain lists of accredited courses to provide to businesses.

Several EHOs commented on the crucial nature of their role in providing specific training and advice to the FSS. It was thought that where EHOs perceived this as a core function of their role, there was a direct capacity to improve attitudes and practices towards food safety within the business.

Several EHOs commented on concerns with ‘absentee’ FSSs. While the professionalism associated with having a statewide FSS for large food businesses was seen as offering some benefits in terms of training opportunities, processes and authority; for smaller operators with multiple sites the ‘absentee’ FSS was seen as providing a means to short-cut the system at the cost of safety standards.

In addition, the system was seen as very complex for small businesses to navigate. For many small businesses the reporting requirements were considered to be ‘over the top’. Some EHOs expressed concerns about the need for lower-risk businesses (such as greengrocers and coffee shops) to comply. Difficulties in identifying appropriate courses were also seen as impacting on this perception of complexity. Some EHOs commented that they were unable to identify the appropriate courses for each industry category. Some business-types seemed to ‘fall between the cracks’.

‘If we can’t understand it, how the hell can you expect a Mum and Pop business to find their way through this?’ (Metropolitan council)

Several EHOs commented that the lack of sanctions for non-compliance (other than court action) made it difficult to reinforce the role of the FSS and the implementation of the FSP. Several examples were given of issues such as non-compliance with record keeping where businesses had directly questioned the capacity of the EHO to compel compliance.

‘I had one guy say to me the other day [on the issue of record keeping] ‘What are you going to do about it? You’d look pretty silly taking me to court....’ And he was right. What can I do about it? Other than annoy him with more frequent visits?’ (Rural council)

One EHO suggested that the ability to apply a Penalty Infringement Notice would improve compliance.

6. Food Businesses

This section provides a summary of the 38 interviews conducted with FSSs and food business proprietors. FSSs had an average of 15 years industry experience (ranging from 2.5 years to 30 years). All interviews were conducted face to face by consultants from CR&C and Culinary Perspectives during May and June of 2005. Interviews lasted from 30 minutes to 1.5 hours. A total of 37 interviews were conducted in metropolitan Melbourne and regional Victoria, and one interview was conducted outside Victoria (Table 4). Eighteen participants were the business owner/ proprietor (of whom only one proprietor was not the FSS)¹. This dual role was particularly common in retail and hospitality services where business size tends to be smaller.

	Regional	Metro	Interstate	Total
Retail	2	2	1	5
Hospitality	8	6	-	14
Community Services	3	3	-	6
Health	2	2	-	4
Food Processing	3	2	-	5
Transport	4	-	-	4
Total	22	15	1	38

6.1 Appointment of the Food Safety Supervisor

The appointment of the FSS was usually made based on the person who was either most knowledgeable about food safety or who was in the best position to supervise the staff, suppliers and other business processes. These qualities were generally seen as arising both through work experience and physical availability to work with staff across different shifts.

“You get the supervisory skills through work experience...” (FSS, metropolitan health service)

“The owner was the Food Safety Supervisor for a while, but then I took over because she is away a lot and I work across most of the shifts...just seemed logical.” (FSS, regional retail business)

“I was offered the position of Food Safety Supervisor because I know the owner and he knows my background...no one there had the training to take it on.” (FSS, regional processing business)

In small businesses the proprietor was frequently also the FSS. In these cases participants usually referred to the hours they worked. However, proprietors also commonly offered a variety of additional reasons for appointing themselves as FSS including their level of experience, their investment in the business, their supervision of other staff and their ultimate responsibility. In hospitality services where the proprietor was not the FSS, this role commonly became the responsibility of the head chef or a staff member who was in a position to offer supervision.

¹ In the text of this section, FSS is used generically to refer to all individuals who hold this position (proprietors and non-proprietor). Quotes identify if a FSS was also the proprietor.

“I took on the role as I work the longest hours in the store and I’m responsible for all of the buying and organising of deliveries...I’m around to supervise the staff...” (FSS/proprietor, regional retail business)

“I’m here most of the time and I have the most experience. Ultimately it’s my responsibility anyway.” (FSS/ proprietor, regional retail business)

“I’m the head chef so I’m responsible for everything that happens in the kitchen.” (FSS, metropolitan hospitality service)

In health and community services the catering or kitchen manager commonly filled the FSS role.

“I was appointed Food Safety Supervisor because as the catering manager I am the main contact person for suppliers and kitchen staff...it fits in well with my role especially within the risk management role...It hasn’t changed the procedures significantly though it now has to reach an agreed standard. It is no longer based on a subjective idea of what is acceptable.” (FSS, regional health service)

6.2 Role of the Food Safety Supervisor

Across all sectors, FSSs commonly identified their primary role as maintaining food safety. This was usually associated with the implementation and maintenance of the FSP.

“Ultimately, you have to take responsibility for the product customers receive.” (FSS, regional processing business)

The FSS was also commonly seen as needing sound knowledge of food safety and the ability to monitor practices and processes to ensure compliance with the FSP and ‘common sense’. Several participants commented on having a certificate in food handling or other industry experience. Other participants mentioned that a food handling certificate should be a prerequisite to the achievement of the FSS competencies.

“The role involves you being responsible...You are responsible for making sure the guidelines are followed, for temperature, transport, storage, deliveries, everything in the Program.” (FSS, regional processing)

“Monitoring and updating the Food Safety Program as required.” (FSS, metropolitan community service)

You have to know how to take temperatures of food, including deliveries, how to store food correctly, transport it, know where the risks are...a lot of it is common sense.” (FSS, metropolitan hospitality business).

“...need to customise templates to the organisation’s needs.” (FSS, metropolitan hospitality service)

“It’s knowing about cleanliness, personal hygiene, food handling, cross contamination...” (FSS, regional hospitality business)

Related to this, record keeping was a considered a key part of their responsibilities by the majority of FSSs.

“As Supervisor I am responsible for...reporting and updating the record of daily and weekly jobs.” (FSS, regional health service)

“I make sure that the staff keep up to date with the record keeping.” (FSS, metropolitan hospitality service)

FSSs commonly considered observation and supervision of staff to be part of their role. Many FSSs had been involved in staff supervision prior to their appointment as FSS. Several FSSs commented that the procedures and reporting requirements are quite onerous on staff and that monitoring was needed to ensure the FSP was adhered to.

“I set the example and I make sure that human nature does not kick-in by stopping people from taking short cuts...” (FSS, regional community service)

“A big part of my job was supervising staff anyway...that’s why I got the Food Safety Supervisor.” (FSS, regional health service)

“Need to supervise staff to make sure the details aren’t overlooked.” (FSS, regional retail business)

“You actually have to watch staff and make sure they are wearing gloves, using the right chopping boards...” (FSS, regional, community service)

Training of other staff was slightly less frequently described as part of the FSS role. Where the FSS was the business proprietor or part of the management team, staff training was seen as a function of this role. Several FSSs mentioned completing a train the trainer course as part of their broader role within the food business.

“As catering manager I did train the trainer. That was really good. We do a lot of extra training like that... like updating the hygiene and food handlers’ certificate and infection control training for all staff members. [Management] is really supportive in that way.” (FSS, regional health service)

“The main role of a Food Safety Supervisor is to train staff to implement the procedures...that’s what I do.” (FSS, regional retail business)

“I did Cert. IV in Workplace Training as a kitchen manager.” (FSS, regional community service)

“I already knew how to train staff, but that is important.” (Proprietor, regional retail/hospitality business)

Several FSSs commented that their appointment as FSS reflected both their ability to monitor staff and suppliers.

“My role is to maintain and monitor what comes in and what goes out in terms of food deliveries.”
(FSS/Proprietor, regional retail business)

“Food Safety Supervisors’ role also includes monitoring deliveries and storage of supplies and stock control.”
(FSS, regional, community service)

“The main role of the Food Safety Supervisor is to implement the HACCP plan which includes checks of the machinery and food as well as yearly HACCP audits and handling complaints which were passed down from the Area Manager.” (FSS, regional, processing business)

In addition, an FSS in the community services area ascribed other roles to the FSS that were specific to their sector or business. These included supervising volunteers, supervising children’s hygiene, ensuring children don’t share food, and educating parents on food safety and nutrition.

6.3 Implementation of the Food Safety Supervisor Role

There was general agreement that the FSS Requirement had resulted in positive changes for the industry. Several participants commented that the Requirement had improved or formalised practices in their business.

“The system has lifted the game all round.” (FSS, regional community service)

“It is all a part of our procedures now...We changed things to accommodate the new procedures...it’s become part of our risk management strategy.” (Proprietor, regional, retail/hospitality business)

Proprietors were particularly likely to emphasise issues concerning reduced risk, increased public safety, and increased confidence in food handling at their premises.

“It’s all about risk management...supervision of staff is as important as checking the temperatures of food and doing the recordings...it’s all about minimising risks to the business. You only need one person to get sick and your business is affected.” (Proprietor, regional retail/hospitality business)

“I’m much more confident about the quality of the food we provide now.” (FSS/ proprietor, regional retail business)

“It is reassuring from an owner’s perspective... you don’t have to worry about getting sued and its reassuring to know that staff know what they are doing....I can go away for a holiday and not have to worry.”

(Proprietor, regional hospitality business)

In addition, the relationship between the FSS and the proprietor/manager of the service was seen as important to the implementation of the FSS role, especially in ensuring that the FSS had ‘back-up’ and that all relevant information and updates were passed on the FSS. The FSSs commented positively on the support they received from the proprietor or management team to implement their role. Concerns generally focused on lack of time and resources rather than differences in opinion.

Many FSSs commented that formal training for other staff supported the role and authority of the FSS and encouraged a greater understanding of the need for compliance and consistency in implementing safe food practices, monitoring and recording. Business practices in some organisations supported regular training for staff involved in food handling, particularly regular updating of Food Handling Certificates.

“All kitchen staff have to update their Food Handlers’ Cert every six months.” (FSS, regional, community service)

In addition, several participants commented that training had changed the way they viewed the FSS Requirement.

“At first I could just see it [FSS Requirement] as a big waste of time. But when I did the training it reinforced things I should have been doing earlier...It places everyone on an equal playing field...it improves consistency for customers so that they have more confidence.” (FSS/ proprietor, regional retail business)

“I’ve got signs up about washing hands, do the recording, that sort of thing.” (FSS/ proprietor, regional retail business)

“More information is needed on training.” (FSS, metropolitan retail business)

However, FSSs also commented on a lack of training in food safety and hygiene in the training they had undertaken.

“Food handling is not covered by the Food Safety Supervisor course – it should be.” (FSS/ proprietor, regional retail business)

“I found the food handlers course to be more useful...I’ll do that again.” (FSS/ proprietor, regional retail business)

Regional FSSs identified considerable difficulties in accessing training in the competencies. Waiting lists for enrolment caused delays in accessing the training while several participants commented that cross-sector training seemed to have little relevance to their business and provided little practical advice or solutions to their business needs. In metropolitan areas, too, there was concern over the lack of customisation in training

“I had to rework the materials after the training to make them relevant to the staff.” (FSS, regional transport business)

“Also in an isolated location finding the training and courses can be extremely difficult particularly if specific training is required...There is a lack of specific training for Class A facilities for the Food Safety Supervisor role and a lack of specific information available.” (FSS, regional health service)

“The Food Safety Supervisor course was not very helpful. It was not specific to hospitality. There were people from hospitals and vineyards and all sorts. I was the only café owner...Food Handlers course was much more practical and helpful.” (Proprietor, regional hospitality service)

Several FSSs commented on having accessed additional training for either themselves or their staff team, including both formal and informal training. Staff meetings were also identified as providing opportunities to informally update and educate staff on food safety.

“I send staff off in pairs to do the Food Handler Course...this is important but it leaves me really short staffed...I also train staff in-house...this is my job as the owner of the business.” (FSS/Proprietor, metropolitan retail business)

“You need to have the staff trained in food handling from a credible and independent source. That carries more weight than if it is just me saying do this, do that. Then we back it up with training on the job and supervision to make sure they are monitoring, checking and recording.” (FSS/ proprietor, regional retail business)

In businesses where there was already a high administrative burden, FSSs had a mixed reaction to the administrative requirements with some explaining they were accustomed to paper work while other FSSs considered the requirements to be ‘over the top’.

“I have less reporting to do about the fuel we sell than the food...that can’t be right.” (FSS/ proprietor, regional retail/hospitality)

“Running a post office you get used to paper work.” (FSS/ proprietor, regional retail/hospitality business)

There was general concern over the recording requirements and the amount of paperwork generated. It was often mentioned that the records are not checked.

“Recording takes a lot of time.” (FSS, regional retail/hospitality business)

“My capacity to undertake the role of Food Safety Supervisor is limited by the amount of paperwork and the time which it takes...it’s not just the paperwork but the procedures...temperature monitoring is beyond reasonable and very hard on a small business with limited numbers of staff and limited opportunities to delegate responsibility...modern equipment provides inbuilt temperature monitoring but this is not taken account of...weekly reporting would be more realistic...a combined sheet for all suppliers then you could just fax it to the council... Recording doesn’t make me money... All this recording stops me implementing other safety procedures.” (FSS/Proprietor, regional retail business)

“It’s a pain in the butt but you have to do it [reporting]...and there is no acknowledgement. The council doesn’t check it. I’m doing it for myself...the procedures aren’t the problem, it’s the recording.” (FSS, regional retail/hospitality business)

“Need to simplify the requirements and identify how long it should take.” (FSS/ proprietor, regional retail business)

A minority of FSSs were concerned over the storage of paper records or expressed a preference for an electronic-based record system.

“Storing forms is a problem. Should be able to get rid of them after a time.” (FSS/ proprietor, regional retail business)

“Record keeping is too laborious and a waste of paper – should be electronic.” (FSS/ proprietor, metropolitan hospitality service)

“Improve the record keeping process. It is too long and cumbersome. Should move from paper based to electronic.”(FSS/ proprietor, metropolitan processing business)

Several FSSs commented that recording was done less frequently than required due to time commitments. Records were generally backdated to accommodate this. Several FSSs stressed that the procedures were still adhered to, though it became clear that there are procedural short-cuts taken.

“Often we would not do recordings every day for example if we were short on staff. The procedures don’t change but the recording might get done the next day.” (FSS, regional community service)

“I do the records weekly and backdate it all...I think this is the way most people survive...if you make it too hard on small business we have no option but to cheat.” (FSS/ proprietor, regional retail business)

“We don’t check every single time food comes from our oven to the bain marie ...we have procedures to check the oven temps and cool room temps so there is really no need to check food temps.” (FSS, regional hospitality service)

Related to this, lack of time and staff were often mentioned as inhibitors to record keeping and the more general implementation of the FSS role.

“I don’t have enough staff to check the temperatures, check and monitor stock, take the deliveries and prepare the food...it is even worse if you are in the public sector...there are less staff to help” (FSS, regional community service)

“I just don’t have the time or the staff...too much paper work.” (FSS, regional retail service)

Several FSSs commented that to implement their role they needed the support of the staff and the ability to delegate functions such as monitoring and recording. Several FSSs mentioned that these functions were now incorporated into job descriptions for other staff.

“We made routines to ensure cleanliness is part of employees’ job descriptions, including daily, weekly and monthly tasks. That way if they don’t do it they aren’t employed any more.” (FSS, regional hospitality business)

FSSs working in health and community service agencies were generally more familiar with accreditation and auditing models through the funding and service agreements. These services often mentioned including other forms of feedback to improve standards such as customer surveys or additional auditing. In addition, it was common for all kitchen staff to be required to have a minimum qualification in food safety and infection control and for training to be regularly updated. Some FSSs also mentioned other practices to improve and monitor staff practices, including quizzes and in-service training.

“...regular quiz for staff...information sheets...we use videos...” (FSS, metropolitan health service)

“We retrain all kitchen staff in level one every six months...” (FSS, metropolitan community service)

6.4 Skills and Knowledge of a Food Safety Supervisor

FSSs identified a range of skills and knowledge that are required by FSSs. These included:

- Knowledge of food safety;
- Hazards/ quality control processes/ HACCP/ risk management;
- Good communication skills;
- Industry experience;
- Ability to supervise staff;
- Ability to train staff;
- Knowledge of FSP
- Business/ product knowledge;
- Common sense/ personality; and
- Awareness of legal issues.

Generally, the FSS was seen as an experienced staff person with sound food safety skills who has the personal and professional authority to supervise staff and business practices.

“The Food Safety Supervisor must have good communication specifically in passing on information about checking temperatures, monitoring deliveries, checking staff use correct procedures such as wearing gloves, using correct boards and clothes as well as ensuring that staff are adequately trained...Everyone needs to support each other and know the roles of other staff.” (Proprietor, regional retail/hospitality business)

“Must have a high degree of skill and knowledge and to be able to pass this on to other people... understand things like cleaning, temperature controls, monitoring the quality of deliveries and maintaining recordings.” (FSS/ proprietor, regional retail business)

“...need a passion for it...it’s what we do all the time.” (FSS, metropolitan health service)

6.5 Resources

Local government and EHOs were seen as potential avenues for obtaining information. The success of this relationship in providing information and resources differed between local governments. In some cases, FSSs identified that more information was desirable.

“More information should be provided from the EHO and the local council.” (FSS, regional community service)

“The stuff we get through the council is pretty generic.” (FSS/ proprietor, regional transport service)

“At present there is no regular information provided by the EHO or local council. This has been an ongoing issue for the local industry and for Div. 1 facilities in the area. I would like more specific information and updates to be provided through the council ...” (FSS, regional community service)

“I don’t get any information from the council. They should provide booklets and leaflets so you know what you are doing...I did the course but I don’t feel confident and I don’t know where to go to get more information.” (Proprietor, regional hospitality business)

“I get a newsletter from the local council...stay in touch through our own chef’s network.” (FSS, metropolitan health service)

“The EHO provides some food information and is not at all autocratic.” (FSS/Proprietor, regional retail business)

“Our EHO is a regular customer, so we are lucky. It is easy to chat about issues.” (FSS/Proprietor, regional hospitality business)

While some FSSs considered EHOs to be a valuable resource in providing information and support, others saw the role of the EHO as more focused on enforcement.

“The EHO should actually help improve the safety and quality of the business, not just tell you what is wrong and leave you to figure out how to fix it.” (FSS/Proprietor, regional hospitality business)

“The EHO should have some sort of checklist to provide feedback to the Food Safety Supervisor...more time should be spent on education and less on inspection.” (FSS, regional hospitality business)

There was also perceived to be a need for prompt information when a potential contamination or breach is reported. One FSS commented on waiting for the EHO to conduct tests after a complaint from a customer, before being given information on avoiding cross-contamination.

“We didn’t understand about cross-contamination of fresh produce...we continued serving for three weeks while we waited for the results...all the EHO had to do was to give us a brochure on dealing with fresh produce. We put people at risk.” (Proprietor, regional hospitality service)

In some cases, FSSs mentioned relationships with auditors and RTOs that provided ongoing support. Training resources and materials were also mentioned as reference materials. Industry associations and industry newsletters were mentioned by a minority as sources of additional information, advice and support. Posters provided by DHS and the Department’s website were also commonly mentioned. Local government and DHS were identified by several participants as trustworthy sources of information.

“Initially we were all pretty threatened about having the third party auditors come out. But it has been a great value add...it’s improved the quality of what we do...compliance...and they are a great source of information...” (FSS, metropolitan community service)

“DHS should provide more resources to save councils and businesses from doubling up. And to make sure that there is a common base level of information.” (FSS/Proprietor, metropolitan hospitality business)

I use the Health Services site and DHS...the source of information is important. If it is from the local council I pay more attention. (FSS, regional community service)

There was seen to be a lack of sector-specific resources. This was particularly evident in regional Victoria where training was often cross-sector to allow sufficient numbers of FSSs to be trained together.

“There is a general lack of specific Class A food safety information...the council could offer significantly more support through information and training.” (FSS, regional health service)

“Customised information for Class A facilities is lacking. There is no one source of information and without the consultants, we would be in the same boat as everyone else.” (FSS, regional health service)

There was some sentiment from a minority of FSSs that practices in food safety do not change rapidly and that updating information is therefore not necessary. However, updated information on legislative changes, events, training opportunities, and other industry news was seen as relevant.

7. Industry Associations

This section provides an overview of the submissions and interviews conducted with six industry associations. To avoid identifying any participating associations, particularly from segments of the industry with a small number of industry associations, the source of quotes has not been identified.

Industry associations were included in this project in a number of ways:

- Firstly, in April 2005 a call for submissions was sent to approximately 50 associations from lists provided by DHS-FSU and an online search. As a result, two associations provided written submissions and one association requested a personal interview.
- Secondly, ten key associations in the sector were contacted by the consultants and asked to participate in a telephone interview. As a result, three associations were available for telephone interview within the timeframe of the project.

This section provides a summary of the feedback received from these six industry associations.

7.1 Role of the Food Safety Supervisor

Consistent with the perception of other stakeholder groups, industry associations described the role of the FSS as involving supervision of staff and business practices, implementation and maintenance of the FSP, and ensuring the safety of food. One association defined the role and responsibilities of the FSS as ‘implementing the competencies that DHS has specified in the training.’

“The Food Safety Supervisor needs to look behind the Food Safety Program to general hygiene and programs that support the Food Safety Program.”

“They need to have a hands-on role with staff.”

“Monitoring staff. Staff supervision.”

“A thorough understanding of the Food Safety Program and the skills to maintain and update it as needed so that it is a practical document.”

Several associations specifically mentioned that the role of the FSS is not clear or requires further definition. This was seen as causing confusion among their members and making it difficult for proprietors and managers to select the right person for the position.

“I’m not sure that we are all singing from the same song book.”

“The role is really unclear...do you need one Supervisor per site? Embedding this level of responsibility in one person does not improve safety standards.”

“Legislation is providing the framework but there should be more thought on providing the detail on the requirements of the Food Safety Supervisor, what is required and how it is assessed.”

Some associations considered that the role of the FSS would differ between internal and external FSSs. In the case of the external FSSs, the role was seen as making recommendations and supporting ‘the company executive’ responsible for food safety.

“...the company executive would still be the ultimate “control-point”; because they have signed the statement of commitment to their food safety plan...The roles and responsibilities of the external Food Safety Supervisor and the company need to be clearly understood. The ultimate aim is to have a qualified Food Safety Supervisor in each and every premises...The Food Safety Supervisor, internal or external, should be capable of the design and administration of the food safety plan...”

Similarly, the role of the FSS was seen as varying between big business and small business. Big business was seen as having access to tertiary qualified FSSs and formalised quality assurance processes. Big business was also seen as having the resources to provide a dedicated FSS or equivalent.

7.2 Implementation of the Food Safety Supervisor Role

There was a general concern from the associations interviewed that the lack of clarity in the role of the FSS was limiting the ability to implement the Requirement in the workplace. There was recognition that for small businesses particularly, the distinction between the roles and responsibilities of the FSS and the proprietor were unclear.

“While the competencies are defined, roles and responsibilities aren’t clearly defined. The role in small business is particularly unclear. The Food Safety Supervisor is not responsible for enforcing the Food Safety Program.”

“The role is not clear...it is just an extra layer. An add-on.”

“How is the role different to the Food Safety Program?”

Associations also considered that there was confusion over what processes should be followed if the FSS does not work across all sites. Similarly, there was concern over the accessibility of the FSS working across multiple sites. An underlying issue with these practices was concern that investing ‘this level of responsibility in one staff person’ reduces the accountability and responsibility of other staff.

“There are problems for small business where the Food Safety Supervisor works part-time...what happens when the Food Safety Supervisor is not present?”

“The responsibility now goes to one person, what if they are not onsite? Who is responsible then?”

“We should embed the responsibility in all staff, not just one person.”

“Does the Food Safety Supervisor need to be onsite all the time?”

The perceived confusion around the role of the FSS heightened a need for clarification of the legal responsibilities of the position.

“The legal significance of the roles and responsibilities of Food Safety Supervisors needs to be clarified as there are varying levels of comprehension about Food Safety Supervisors’ obligations.”

There was also seen to be a focus on compliance (or more particularly the demonstration of compliance through record keeping) rather than outcomes. Several associations saw a need for an approach that was more outcome focused and that reflected the level of risk involved in the business.

Some associations also reflected on the inconsistency of information and support available to FSSs and proprietors. Associations expressed concern about different standards being applied by auditors and EHOs. There was also concern about an inconsistency of approach between and within councils. These perceived inconsistencies led associations almost unanimously to identify a need for guidance and leadership from DHS. There was concern that without DHS direction, RTOs were often left with the responsibility of defining the role of the FSS.

“[There is a] lack of guidelines about the roles and responsibilities of Food Safety Supervisors... lack of consistency of advice and guidelines across the Victorian councils.”

“There is complacency with auditors and an inconsistency...they seem to see things differently than do EHOs...and then there’s inconsistency between EHOs, not just councils.”

“They need more guidance from DHS. A tick approach, but not a checklist. Something that gives them the structure.”

“There appears to be great variability in what RTOs explain to Food Safety Supervisors in training regarding their responsibilities.”

Related to this, some associations requested a need for greater transparency and accountability in the process. One association suggested that DHS should publish an annual report of council activities in relation to food safety compliance. Other associations suggested the publication of statistics such as the number and frequency of site visits, actions taken against businesses and other measures to ‘demonstrate that the system is working’. One association also identified a need to ensure that Victoria

remains part of the national approach to food safety and emphasised the need for DHS-FSU to liaise with other states and territories as they implement the FSS Requirement.

“There is poor transparency across local government. There should be a report published by DHS of local government activity in monitoring standards...We need a MoU [Memorandum of Understanding] that local government adheres to and reports to DHS.”

“We need a nationally consistent approach. Victoria may have been the first, it doesn’t mean that it can’t be improved...we need to be revising legislation or aligning the requirements with other states. Food safety needs a nationally consistent approach.”

“This will show us if the system is working. How effective are Food Safety Supervisors in their workplace?”

There was also doubt expressed about the ability of businesses to understand the training framework. It was suggested that it is difficult for businesses to identify what training is required and where this training is available. There was concern about delays in accessing training in rural areas. Across all areas training was seen as being of a variable quality and often lacked workplace relevance in the delivery of content or assessment of skill. Again, it was commonly identified that DHS-FSU should take a leadership role in clarifying the requirement for business and setting standards for the delivery of training.

“The competency standards are hard to get your head around.”

“RPL does not exist in reality. RTOs will not give recognition.”

“It’s difficult for people who move between sectors – like retail and hospitality... is it possible to have some sectors combined to simplify it?”

“There are many courses available in food safety and food handling. Food Safety Victoria should evaluate these courses, and accredit the courses that they agree comply with their requirements for Food Safety in Victoria. All Food Safety Supervisors should undertake and complete such courses or be assessed as being competent.”

“Many proprietors and food handlers are confused with the different training levels available to them and the difference between food handling/ hygiene certificates compared to food safety supervisor training. This is compounded by different RTOs marketing the names of courses differently, including non-recognised training and requiring the potential trainee to understand the competency codes and different industry sectors such as hospitality, retail or manufacturing...Since the removal of the list of RTOs and training providers from the Department of Human Services website, it has become more difficult for food handlers to seek out suitable training.”

“Many rural areas have indicated that there are not sufficient numbers of training providers available and when there are training providers then it is difficult for businesses to find times when the course is being held and they can send someone along. Often courses are cancelled as the class sizes are too small therefore creating a further barrier to successful training.”

There was also concern that training may not adequately equip some FSSs for their role in relation to the supervision and training of other staff. Several associations saw a need for a focus on training and supervisory skills, at least for a sector of the market.

“[FSSs are not able] to identify all the relevant requirements for the premises when implementing the Food Safety Program or fail to maintain the full implementation of the Food Safety Program on an ongoing basis. In particular the most common gaps identified include monitoring the compliance rate of all staff they have responsibility for, taking corrective measures where they have identified gaps in staff practices and conducting/facilitating adequate induction and ongoing training for all staff they have responsibility for...”

“Some Food Safety Supervisors have difficulty in identifying training needs for other staff and may not have the ability to either carry out staff training or the authority to enrol staff into external training due to business financial constraints. It may be even more difficult for a Food Safety Supervisor from a culturally

and linguistically diverse background to train other staff from different backgrounds with poor English skills. For Food Safety Supervisors to be comfortable to undertake this role in training other food handlers further “Train the Trainer” training would be of benefit.”

While it was commonly agreed that FSS training should include a requirement for regular updating of competency, one association observed that ‘nothing much is going to change, so why update?’ Several associations also stressed that all people involved in food handling should be required to undertake training in basic food handling.

“Qualifications based on these accredited courses should also have a currency factor i.e. that the qualifications should have an expiry and or renewal date. This would make the process of appointing a Food Safety Supervisor more stringent. A suggested interval for the Food Safety Supervisor to renew his/ her qualifications is every five years.”

Flexibility and a focus on outcomes, not just processes, were also stressed in the assessment of compliance with the FSS Requirement. There was concern that assessment against competencies of the FSS did not recognise the level of risk involved in the business. A similar issue was also raised in relation to the FSP, where it was considered that assessment against a template for compliance may not take into account the unique features of the business.

“Local government needs to assess the Food Safety Supervisor and the business on a risk management basis. They need to look at the level of demand in demonstrating competency.”

Some associations considered that businesses should be held accountable for the competency and training of the person appointed to the FSS position.

“Owners can appoint whoever they like to be the Food Safety Supervisor and so long as they have a certificate, no one looks at the demonstration that they actually know what they are doing.”

“The nominated Food Safety Supervisor may not fully understand the legal ‘liability’ of their role. Often people are selected to hold this position in a business without the necessary explanation of their role and legal responsibilities. The business operator may elect himself or herself to be the nominated Food Safety Supervisor and so hold the authority by default in ensuring corrective actions are implemented. However there are many businesses where a person has been chosen to hold the role of Food Safety Supervisor with no formal recognition of the role i.e. no job description, no written authority to support Food Safety Supervisor so that other staff are aware of their responsibilities.”

7.3 Skills and Knowledge of a Food Safety Supervisor

While some associations considered that the current competencies defined the skills and knowledge of an FSS, other associations considered that the skills and knowledge should be defined and then articulated into the competencies.

“The competency of the Food Safety Supervisor should be determined by current accredited courses which define the skills and knowledge of a Food Safety Supervisor.”

“You need to start again from the outcomes and work backwards.”

Common skills and knowledge considered by associations to be essential to the role of the FSS included:

- Ability to implement and maintain the FSP;
- Understanding of food safety;
- Ability and authority to supervise staff; and
- A clear job description.

“...it is imperative that the Food Safety Supervisor has the authority within the business to undertake action if they identify any problems and they able to fully implement the Food Safety Program. This is regulated in the Food Act but very difficult to assess and mandate.

“We need to stress that the Food Safety Supervisor must be able to rigorously demonstrate that he/she is competent in all the areas of preparation of food that is safe to sell.”

7.4 Resources

The resources available to the FSS were seen as dependent on factors such as the size of the business. Big businesses were seen as having access to a greater range of supports and resources than were smaller businesses. Small businesses were seen as being particularly dependent on their relationship with local government for gaining the support and information they required. While EHOs were considered to be a valuable resource, their time was seen as ‘strained to breaking point’ and their approach was seen as ‘variable on a case by case basis.’ There was also concern that it is difficult for EHOs to balance enforcement and education and that there may be a reluctance from some businesses to seek assistance from an EHO for fear of sanctions.

“EHOs are a great resource but they have so little time and the quality and approach varies from individual to individual. There seems to be no clear direction.”

“Very few resources for Food Safety Supervisors have been allocated and it needs to be stressed that there should be a whole-of-government approach to the resourcing of support services. If more stringent training (e.g. refresher training and accreditation) are to be introduced then there needs to be resources dedicated via those government departments responsible for the tasks. There should not be another layer of costs to be met by businesses... At the very least, Food Safety Victoria should have a dedicated service/advice line for Food Safety Supervisor.”

The resources available through DHS-FSU were commented on by some associations. The RTO list that had previously been available on the website had been seen as very helpful. The FSP template was commonly identified as being very useful.

“DHS’ resources like the website and the template are a good start but small businesses don’t have continuous access to information and training that big businesses have on staff.”

8. Conclusions and Recommendations

This section provides a brief overview of the conclusions drawn from the research and makes recommendations for consideration by DHS-FSU.

All stakeholder groups identified issues with training – including locating RTOs, identifying required competencies, industry relevance, accessibility and consistency.

It was clearly difficult for food businesses to identify appropriate training opportunities to meet the FSS Requirement. This was compounded by the use of varying terminology to describe the competencies (e.g. courses, training packages, training codes, levels) and alternative competencies for different sectors (which may or may not be deemed equivalent by individual EHOs). EHOs and industry associations have also indicated these same difficulties in assisting food businesses to meet the training component of the FSS Requirement. In addition all stakeholder groups, including RTOs, identified different approaches to and interpretations of the delivery of the competencies which affect cost, duration, workplace relevance, assessment, resources and content.

There was a clear need for leadership in assisting food businesses and other stakeholders to identify and assess the relative merits of different ways to attain the competencies.

Recommendation 1: It is recommended that DHS-FSU develops and publishes a guideline or checklist to assist food businesses to identify the competencies required for their sector and the relative merits of alternative approaches in delivering the competencies. This will also provide direction to the training sector and local government in interpreting the expectations of the Department in relation to best practice. (See also Recommendation 2.)

There was a general lack of clarity about the role of the FSS in different sectors of the food industry. Where it had become the responsibility of the training sector to clarify the role and responsibilities of the FSS, in some cases this has resulted in different interpretations of the role between providers.

Recommendation 2: It is recommended that the DHS-FSU publishes a guideline about the role of the FSS. It should include industry case studies to assist current and potential FSS to understand the role of the FSS and to provide consistency of interpretation between RTOs. This resource could also provide proprietors with information on selecting an appropriate person to fulfill the FSS position.

All sectors identified supervision and authority as important aspects of the FSS role.

There was agreement across all stakeholder groups that the FSS needs the authority and supervisory skills required to monitor, direct and train staff in maintaining food safety and the implementation of the FSP. This was particularly emphasised by RTOs and EHOs. While these skills are not part of the present competencies, many RTOs are now delivering some aspects of this skill-set within their delivery of the competencies. It was also clear from the FSS and proprietor interviews, and unpublished research currently being undertaken for DHS-FSU by Campbell Research & Consulting (2005), that many FSSs are already in positions of authority and have broader responsibilities for the monitoring, direction and training of staff. Imposing an additional supervisor competency on these FSSs does not appear to be warranted. While it is possible that greater awareness and transparency of the role of the FSS may discourage the appointment of less experienced FSSs, it is also likely that new entrants to the

industry will continue to be appointed as FSSs, particularly in the establishment of new businesses where the role is fulfilled by a proprietor new to the food sector. These entrants may benefit from participation in a voluntary training program to provide skills in monitoring, supervising and training staff in food safety.

Recommendation 3: It is recommended that the acquisition of supervisory competencies should remain voluntary. This point could be linked to Recommendation 2 in identifying a need for less experienced FSSs to undertake supervisory training and Recommendation 1 in assisting candidates to identify providers that offer the training most appropriate to their sector, level of experience and prior learning.

All stakeholder groups identified problems with record keeping, particularly for small business.

There was concern expressed by all stakeholder groups that the reporting requirements are arduous on small business, and seem particularly ‘over the top’ for low-risk businesses. Industry associations in particular mentioned issues related to small business. FSSs and providers were concerned over the volume of paper work required, with a minority suggesting a need for an electronic option. There was some indication from FSSs and proprietors that not all businesses are complying with the recording requirements, though in many cases the procedures are still being adhered to.

Recommendation 4: It is recommended that the DHS-FSU considers alternative methods of reducing the recording burden on small business. One option would be to accredit compliant businesses to undertake weekly or exception reporting.

All sectors identified the role of the EHO as important in supporting the Food Safety Supervisor. However, consistency, availability, timeliness and the role of EHOs were seen as varying within and between local governments.

It was clear from all stakeholder groups that the EHO relationship is critical in encouraging well-meaning businesses to comply with food safety standards and in providing incentives (through sanctions or the threat of sanctions) to enforce compliance in non-compliant businesses. The ability of EHOs to provide practical, workplace advice on food safety was seen as very important to food businesses.

Several RTOs expressed concern about the lack of availability of EHOs as ‘guest speakers’ to training programs for the sectors. EHOs were seen as having practical advice to offer learners while at the same time building a relationship with their potential customer base (i.e. FSSs).

There was some concern from industry associations and FSSs that some food businesses may be reluctant to ask advice of EHOs for fear of sanctions.

Related to this, all sectors identified a lack of resources for FSSs (and RTOs), particularly industry specific information, content and direction.

Interviews with FSSs, proprietors and industry associations suggested that information from local government was seen as variable in terms of volume, quality, reliability and timeliness. Where businesses held membership to industry associations, these contacts were seen as good sources of information and advice. RTOs, private trainers and auditors were also used by some food businesses as

additional sources of information, as were government departments and agencies such as DHS and FSANZ. While CR&C is aware that DHS is presently undertaking a broad review of food safety information resources, there appears to be a lack of industry specific information for FSSs. This perception may reflect issues of distribution and supply; that is, the materials may be available but not accessible to some businesses where distribution is mediated through intermediaries with different approaches and variable effectiveness.

Recommendation 5: It is recommended that DHS reviews its information resources specifically targeted to FSSs and its methods of distribution to ensure that all Victorian FSSs are readily able to access information about food safety relevant to their sector of the industry. This may include wider promotion of the role of the DHS-FSU, online information and opportunities to order hardcopy resources.

Appendix 1: RTO/ HE Interview Guide (teachers/ trainers)

- **General Introduction**
 - Explanation of the project, privacy requirements and interview procedure
- **Participant Background**
 - Training provider (private vs public, metro vs regional, etc)
 - Subjects taught
 - Student characteristics
 - Length of experience in education
 - Years in current position
 - Other relevant industry experience
- **Role of the Food Safety Supervisor**
 - What do you see as the MAIN role or responsibility of the Food Safety Supervisor?
 - What OTHER roles and responsibilities does the Food Safety Supervisor position fulfil?
 - The Act requires that the Food Safety Supervisor ‘has the ability and authority to supervise other people handling food at, or from, the premises and ensure that the handling is done safely’. What do you understand this to mean?
 - Given what you know about the work required of Food Safety Supervisors, what do you believe to be the essential skills and knowledge required?
 - How do you think that Food Safety Supervisors acquire these skills and knowledge?
- **Courses and Information for Food Safety Supervisors**
 - How does your course provide Food Safety Supervisors with the skills and knowledge they need to do their job?
 - Do you provide any practical materials or resources Food Safety Supervisors can use in the workplace? Explore fully.
 - Does your training address how a FSS should ensure food is handled correctly at the premises? How do you support or teach Food Safety Supervisors to ensure food is handled correctly at their premises?
 - How effective do you think this training is when Supervisors are back in their work environment?
 - Can you suggest any ways to improve the ability of Food Safety Supervisors to ensure food is handled correctly at their premises?
- **Barriers and Enablers**
 - What factors do you see as driving Food Safety Supervisors’ compliance with the Food Act? Is there anything else? Explore practical implications.
 - Are there any particular factors that you see as limiting Food Safety Supervisors’ compliance with the Food Act? (Probe with authority of the FSS to correct others, workplace culture, etc). Explore fully.
 - How can these limitations be overcome? Can you suggest any strategies?
- **Summing Up**
 - Are there any other comments you would like to make about the role or responsibilities of the Food Safety Supervisor before we finish?

Appendix 2: EHO Interview Guide

➤ **General Introduction**

- Explanation of the project, privacy requirements and interview procedures.

➤ **Participant Background**

- Length of time in the industry
- Years in current position
- Previous experience in this role
- Relevant academic or industry training undertaken

➤ **Role of the Food Safety Supervisor**

- What do you see as the MAIN role of the Food Safety Supervisor?
- What OTHER roles and responsibilities does the Food Safety Supervisor position fulfil?
- Given what you know about the work required of Food Safety Supervisors, what do you believe to be the essential skills and knowledge required?
- How do Food Safety Supervisors acquire these skills and knowledge? Probe fully.
- What are the common areas of strength that you see in the skills and knowledge of Food Safety Supervisors?
- What are the common areas of weakness that you see in the skills and knowledge of Food Safety Supervisors?
- Can you suggest how these weaknesses could be overcome?

➤ **Implementation of Role**

- The Act requires that the Food Safety Supervisor ‘has the ability and authority to supervise other people handling food at, or from, the premises and ensure that the handling is done safely’. What do you understand this to mean?
- From your experience, how do Food Safety Supervisors ensure food is handled correctly at the premises? Can you think of any examples of best practice? What makes this a good approach?
- Conversely, what examples have you seen of poor practices? What do you think sustains these practices? How can they be improved?

➤ **Barriers and Enablers**

- What other factors do you see as driving Food Safety Supervisors’ compliance with the Food Act? Is there anything else? Explore practical implications.
- Are there any particular factors that you see as limiting Food Safety Supervisors’ compliance with the Food Act? (Probe with authority of the FSS to correct others, workplace culture, etc). Explore fully.
- How can these limitations be overcome? Can you suggest any strategies?

➤ **Summing Up**

- And are there any other comments you would like to make about the role or responsibilities of the Food Safety Supervisor before we finish?

Appendix 3: Food Business Interview Guide

- **General Introduction**
 - Explanation of the project, privacy requirements and interview procedures.
- **Participant Background**
 - Length of time in the industry
 - Years in current position
 - Previous experience in this role
 - Relevant academic or industry training undertaken
- **Role of the Food Safety Supervisor**
 - How was the appointment of Food Safety Supervisor made?
 - What do you see as the MAIN role of the Food Safety Supervisor?
 - What OTHER roles and responsibilities does the Food Safety Supervisor position fulfil?
 - Given what you know about the work required of Food Safety Supervisors, what do you believe to be the essential skills and knowledge required?
 - How do you think Food Safety Supervisors acquire these skills and knowledge?
Probe fully
- **Implementation of Role**
 - The Act requires that the Food Safety Supervisor ‘has the ability and authority to supervise other people handling food at, or from, the premises and ensure that the handling is done safely’. What do you understand this to mean?
 - From your experience, how do Food Safety Supervisors ensure food is handled correctly at the premises? Can you think of any examples of best practice? What makes this a good approach?
 - Conversely, what examples have you seen of poor practices? What do you think sustains these practices? How can they be improved?
 - What other strategies/procedures are in place to support the Food Safety Supervisor?
Explore fully.
 - How effective are these strategies/procedures with different staff groups – casual, part-time, full-time? Are there particular areas where compliance is a problem? How can this be improved?
- **Resources**
 - What resources do you have to support the role of the Food Safety Supervisor?
 - Are these resources used? Why/Why not?
 - How could these resources be improved?
 - Have you seen any other information that supports the role of the Food Safety Supervisors?
 - What was this information? Who produced it? How have you used this information at your premises?

➤ **Barriers and Enablers**

- What factors do you see as driving Food Safety Supervisors' compliance with the Food Act? Is there anything else? Explore practical implications.
- How does the business facilitate/support the Food Safety Supervisor to undertake this role?
- What other supports are available to the Food Safety Supervisor?
- What factors limit the ability of the Food Safety Supervisor to fulfil the role? (Probe with authority of the FSS to correct others, workplace culture, etc). Probe fully.
- Can you suggest how these limitations can be overcome? Can you suggest any strategies? Probe fully.

➤ **Summing Up**

- And are there any other comments you would like to make about the role or responsibilities of the Food Safety Supervisor before we finish?

Appendix 4: Industry Call for Submissions

Date

Name

Position

Organisation

Address 1

Address 2

Dear _____,

Re: Call for Submissions: Evaluation of Stakeholders' Understanding of the Food Safety Supervisor's Role (Victoria)

The Victorian Department of Human Services, Food Safety Unit, is conducting an evaluation of the Food Safety Supervisor requirements of the Victorian Food Act 1984. As part of this project, Campbell Research & Consulting (**CR&C**) has been commissioned to evaluate *stakeholders' understanding of the Food Safety Supervisors' role* (see attached letter of introduction).

I am writing to you to encourage your participation in this Evaluation.

The two key objectives of the stakeholder component of the Evaluation are to explore:

1. Industry support and understanding of the *skills and knowledge* required by Food Safety Supervisors.
2. The ability of Food Safety Supervisors to *meet their responsibilities* under the Victorian Food Act, including ensuring that others handle food safely.

I appreciate that there are a number of competing demands on your time but hope that you will take this opportunity to express your views on the Food Safety Supervisor Requirement.

Other stages of this research are being conducted with Food Safety Supervisors, food business proprietors, Registered Training Organisations and Environmental Health Officers.

Industry associations and representatives are invited to make written submissions against these objectives to the consultant prior to 25 April 2005.

In providing submissions, you may wish to comment on the:

- ✎ Role and responsibilities of Food Safety Supervisors
- ✎ Skills and knowledge required by Food Safety Supervisors
- ✎ Resources, support and training available to Food Safety Supervisors to carry out their role effectively
- ✎ Enablers and barriers to the implementations of the role and responsibilities of Food Safety Supervisors

Submissions should be addressed to Cheryl Reed, Director of Research, Campbell Research and Consulting:

BY MAIL

PO Box 441
Clifton Hill Vic 3068

OR

BY FACSIMILE

(03) 9482 6799

OR

BY EMAIL

creed@campbellresearch.com.au

All submissions will be treated in accordance with relevant privacy legislation and the *Market and Social Research Privacy Code*. No information will be released that could identify an individual or organisation.

I encourage you to take this opportunity to provide your feedback to the Department as part of the *Evaluation of the Food Safety Supervisor Requirement of the Victorian Food Act (1984)*. This is an important Requirement of the Act and we value your opinions and experiences.

For further information about this call for submissions, please contact me on (03) 9482 4216. Alternatively, for general information about the evaluation, please contact Jody Eden-Jones, Department of Human Service, Food Safety Unit, on (03) 9637 4092.

Yours sincerely,

Cheryl E Reed
Director of Research



Appendix 5: Bibliography

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