

INSIGHT QUALITY CONSULTANCY SERVICES LLP

HYGIENE AUDIT PROCEDURES

HAIQCSSOP01

ANNEXURE VI

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See the change



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Purpose

The purpose of this procedure is to define the procedure for Hygiene Audit, to verify whether quality activities and related results comply with the planned arrangements and to determine the effectiveness of the hygiene rules and regulations prescribed by FSSAI.

Scope

The scope of this procedure covers:

- i. Qualifications & responsibilities of Hygiene Auditors;
- ii. Planning of audit, implementing audit, follow up and reporting on the results of audit.

Reference

The criteria described in this document forms the QCI/PADD/HRAA-Requirements version 2-Oct-2022 & in addition to the Roles and Responsibilities of Audit Agencies and Auditors prescribed in Chapter 3 of the FSSAI – Hygiene Rating Scheme document.

Responsibility

Hygiene Auditor is responsible for the audit procedure

Legal responsibility

We are a legal entity. The status and structure of IQCS LLP is formally documented and we comply with all the requirements of QCI and FSSAI hygiene rating procedure, version 2, October 2022 and Hygiene rating scheme document.

IQCS LLP is a legal entity, who can be legally held responsible for its work irrespective of whether the entire organization or a part of it performs the audit activities.

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Qualification of Auditor:

1. Hygiene Rating Auditor is the qualifying auditors of Hygiene Rating Audit Agency and meeting the eligibility criteria stated in Expression of Interest (Eoi) of FSSAI and Hygiene Rating document.
2. The qualification of auditors meets the following minimum requirements specified by FSSAI, namely:
 - i. Bachelor’s degree in Food or Dairy Fisheries or Oil Technology or Biotechnology or Agricultural or Veterinary Sciences or Bio-chemistry or Microbiology or Chemistry or Catering Technology or Hotel Management from a recognized university;
 - ii. Auditors have qualification and experience in food sector.
 - iii. Knowledge of the Food Safety Act 2006 and the rules and regulations made there under; sector specific knowledge of hygienic and sanitary practices, processing techniques, hazards identification, analysis and control and knowledge of contaminants, allergens, etc.;
 - iv. The auditors meet the requirement of at least 30-man days audit experience in food service sector.
 - v. Auditor undergone and qualified mandatory FoSTaC Training for Hygiene Rating Auditor conducted by FSSAI.
 - vi. Mentoring, Onsite monitoring and authorization for auditors;
 1. Auditors are given mentoring audit onsite by experienced hygiene rating auditor for a minimum of 3 audits before issuing the authorization to conduct audit in IQCS.
 2. The audit is getting monitored by the experienced auditor during the onsite audit and report of monitoring are submitted to IQCS.
 3. The auditor ensures that the opening meeting and closing meeting is done in each audit and records of the same is maintained.
 4. The auditor collects formats of audit schedule, confidentiality agreement, opening and closing meeting agenda audit checklist in hard copy/google form and customer satisfaction forms are collected from IQCS office.
 5. The audit schedule is circulated to the auditee in email/whats app form to the FBOs.
 6. The checklist is filled in the premises of FBO and keep it as auditor notes.
 7. The non-conformities, if any are noted in the NC form. The observations are noted in the audit checklist.

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Procedure

Planning of Audit

The activities under different areas to be audited are identified and listed by the Hygiene Auditor. The number of audits and intervals of audits in respect of each activity is decided by the Hygiene Auditor, based on the status and importance of the activity.

The task of auditing as per the schedule is entrusted to Audit Agency.

In planning the following points are involved.

1. FBO application or enquiry/Govt. agency letter or list of FBOs to be audited. FBO director enquiry can be in email or verbal. If the enquiry is in verbal form are noted in IQCS customer review requirement form and send the confirmation in email or whats pp.
2. Contract/letter of approval collection from FBO/Govt. agency
3. Once the approval from Govt. agency is received then the audit plan is circulated to them in email before 3 days of audit.
4. The audit schedule is communicated to the Govt. agency/FBO before 3 days of audit.
5. Once the contract and advance fee is received from private party, the audit schedule is sent to the FBO before 3 days of audit. In circumstances where only contract is received, then audit plan/schedule is sent once the confirmation on payment part is received from the private organizations.
6. The plan is done using audit plan form and scheduling is done using audit schedule form. Audit plan is done by Director/CEO.
7. Audit schedule is done by respective auditors.

Man-day calculation

Suggested man-days for hygiene rating audits

Food Handlers	Man-days (including reporting time)
<50	0.5
<100	1
>100	1.5

Implementing Quality Audit

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Impartiality and independence

Audit activities are undertaken impartially. The top management’s commitment to impartiality is demonstrated by documenting our policy on safeguarding impartiality and ensuring that it is understood at all levels of the organization and making available its policy on impartiality, to the public through its website.

We are responsible for the impartiality of its audit activities and not allow commercial, financial or other pressures to compromise impartiality. We have no direct relationship with the Food Establishments (FEs) other than audit activities as a third-party conformity assessment body.

We identify the risks to its impartiality on an ongoing basis. This includes the risks that raised from its audit activities, or from its relationships, or from the relationships of its personnel. However, such relationships do not necessarily present a Hygiene Rating Audit Agency with a risk to impartiality.

A relationship that threatens the impartiality of our Agency can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing (including branding), and payment of a sales commission or other inducement for the referral of new clients, etc.

If a risk to impartiality is identified, and we are able to demonstrate how it eliminates or minimizes such risk.

We are independent to the extent that is required with regard to the conditions under which it performs its services. Depending on these conditions, we meet the minimum requirements as given below:

We are not engaging in any activities that may conflict with their independence of judgment and integrity in relation to their audit activities. In particular, they are not be engaged in the design and establishment of a FE, supply, purchase, installation, maintenance of equipment or services used in a FE and prohibited from any kind of consultation or offering training.

We are not related to an entity that is engaged in the design and establishment of a FE, supply, purchase, installation, maintenance of equipment or Services used in an FE including any kind of consultation or training.

Confidentiality

We have a documented policy and mechanism to safeguard the confidentiality of information obtained or created during the course of audit activities. It is also be part of the audit agreement.

Our Personnel, including any committee members, contractors, personnel of external bodies or individuals acting on the our HRAA's behalf, keep confidential on all information obtained or created during the performance of the our HRAA's activities. We have a mechanism such as obtaining signed confidentiality agreements, etc, for ensuring the same.

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Hygiene Auditor ensures that individual auditors carry out audits as per the schedule provided to them.

The results of audits are recorded as Audit Reports. Nonconformity observed and the time-bound corrective action are identified and mutually agreed between the auditors and auditee/the management person responsible for the audited area. While writing the non-conformity the possible causes of non-conformity also be mentioned in the NC reports.

Before scheduling the audit, auditor checks the availability of FSSAI valid license, water test reports, FOSTAC training and medical checkup records in client’s premises. The format to be used for the same is client information form, IQCS/F/MG/F02/0. The auditor ensures that the opening meeting and closing meeting is done in each audit and records of the same is maintained.

The auditor collects formats of audit schedule, confidentiality agreement, opening and closing meeting agenda audit checklist in hard copy/google form and customer satisfaction forms are collected from IQCS office.

The audit plan/schedule is circulated to the auditee in email/whats app form to the Govt. agency/FBOs.

The checklist is filled in the premises of FBO and keep it as auditor notes.

The non-conformities, if any is noted in the NC form. The observations are noted in the audit checklist.

Administrative Requirement.

Audit agreement

We have a legally enforceable agreement for the provision of audit activities to the Food Establishments (FEs). Audit agreements are consisting of the responsibilities of the HRAA and its clients (FEs).

We ensure that its audit agreement specifies the requirements to be complied by the FEs as mentioned in the following:

- a. Fulfilling the scheme requirements as specified in the “Hygiene Rating Scheme”, and the changes notified by the HRAA, time to time;
- b. Make all necessary arrangements to conduct audits, including provision for examining documentation and the access to all processes and areas, records, and personnel for the purposes of initial audit, surveillance, renewal audit and resolution of complaints.
- c. Make provisions, where applicable, to accommodate the presence of observers (e.g. QCI assessors

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or trainee auditors).

- d. When the HR scheme introduces new or revised requirements both in audit criteria and audit process requirements that affect the applicants and the rated FEs, the FEs implement the changes in its systems, necessitated by these changes.

The FEs are supposed to the HRAA during the contracted period, without delay in the event of any of the following:

- i. Changes and / or modifications of premises.
- ii. Major changes in the internal control measures.
- iii. Major changes in the system which could have born on implementing the pre – requisites such as Good Manufacturing Practices (GMP) and Good Hygienic Practices (GHP) as per the Schedule IV of FSS (Licensing & Registration) Regulations, 2011 and amendments thereto of FSSAI.

We have document procedures for providing the information about audit status to the FEs. We also identify the aspects that would be considered as misleading and unauthorized as relevant to the relevant Hygiene Rating Scheme. The audit agreement makes appropriate cross reference to the scheme requirement to make it legally binding.

Audit Fees.

- i The fee is charged to the FEs in a non-discriminatory manner.
- ii The HRAA’s fee structure is publicly accessible and also be provided on request of the FEs.
- iii HRAA notifies and obtain consent to its fee structure from its client / FEs prior to grant of audit. As and when the fee undergoes a change, the same is communicated to its clients including applicants and the FEs already rated for hygiene rating scheme for their acceptance.

Liability Provisions- Hygiene Rating Audit Agency can be able to provide sufficient evidence to demonstrate its stability. The Hygiene Rating Audit Agency have adequate provision (e.g. insurance or reserves) to cover liabilities arising from its operations.

Structural Requirements

Organization and management

Our Agency is structured and managed to safeguard impartiality, we form a part of a legal entity performing other activities, the relationship between audit activities and other activities are defined in the organization chart or organization structure. We have documented roles and responsibilities of the employee with their qualification and experience involved in the audit activities including the employee involved in hygiene rating scheme.

Our Agency organizes and manage its capability to perform its audit activities.

The Hygiene Rating Audit Agency have available one or more person(s) as Subject Matter Expert (SME) or technical manager(s) who have overall responsibility to ensure that the audit activities are carried out in accordance with the scheme requirements. Our technical Director has a postgraduate in Food Science (Food and Oil Chemistry) and our Assistant Technical Manager is Post Graduate in Microbiology with 2

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years of experience in the field of food safety.

The SME / Technical Manager is technically competent and experienced in the operations of a HRAA and fulfills the responsibilities as mentioned.

Reporting of Audit Results:

Hygiene Auditor reports the analysis of the audit results to FSSAI using the software application in the hygiene rating audit website on completion of the audit without delay and as per software allowed provisions.

HRAA Procedures:

1. Audit examination by the agency covers the collection of objective evidence and documenting audit observations. Evidence are collected through interviews, examination of documentation and observation of activities.
 - a. Photographic evidence of documents is captured in the software application
 - b. Each observation is recorded in a software application
 - c. Interview notes with auditor comments are captured and recorded.
2. Where the deficiencies or non-conformances are detected, they are documented clearly and concisely and point out the regulatory requirements that are being contravened.
 - a. Each non-conformance is recorded, and gaps are highlighted which can be viewed by both Catering establishments and FSSAI.
3. The auditing agency checks relevant documents related to laboratory reports maintained by the Catering establishment as part of compliance with various regulations made under the FSS Act.
 - a. The documents and photographs may be uploaded in the software application as required.
4. The auditor loads the audit findings to the centralized repository maintained on behalf of FSSAI.
5. The centralized repository can generate a comprehensive audit report which can be handed over in soft copy format (delivered through mobile application with customized user interface) to the Catering Establishment.
6. The software application, through the audit report, provides indication of necessary follow-up action, including further audits, to check whether any corrective action was taken to remove any deficiency of such food safety program identified in the audit.

Procedure for Audit Report:

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1. With instant sync and reporting capability of the software application, the auditor reports the findings of the audit to the Catering Establishment after the completion of the audit.
2. The audit report provides capability for the Catering Establishment to provide necessary justification and/or clarification to the auditor. All this information is exchanged on the agency's web portal.
3. The non-conformities of the audit may be classified into two categories, namely:
 - Major non-conformity- The auditor reports serious failures in the food safety management system of the Catering Establishment, which may result in adverse health consequence possibly even fatal, such findings to FSSAI within 24 hours. FSSAI after ascertaining the seriousness of the situation and take regulatory action against the concerned food business operator. The software application triggers an automated e-mail with audit finding to FSSAI as soon as the auditor submits the report online and the data syncs with the server.
 - Minor non-conformity-When there is a shortcoming in the food safety management system or regulatory contravention of the Catering Establishment, which may not cause any adverse health consequence, the auditor sets up an appropriate timeframe for its rectification and follow up, so that the non-conformance could be rectified.
 - The software application has built-in capability to define appropriate rectification timeframe.
4. Failure by food business operator to rectify the minor non-conformity within the specified timeframe is referred to FSSAI.
5. The audit agency will provide industry specific standard corrective actions for the non-conformances to the Catering Establishment within 24 hours of conducting the audit.

Roles and Responsibility of Auditor:

Auditor obeys the requirements stated by FSSAI:

- i. Evidence are collected against the cross-reference matrix relevant to the industry.
- ii. Audit evidence are recorded as material documentary or record evidence or as pictures or by interview or by observation.
- iii. The auditor has a detailed audit report (apart from the online shave audit notes prepared during audit other than the audit report which he submits or enters the hygiene rating port portal. The

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evidence report collected by the auditor remains with the auditor and auditing agency for a period of not less than 1 year.

- iv. The auditors do not use any information provided to him during audit by the FBO for any other purpose other than audit
- v. The auditors note down the time of opening of meeting of audit and closing time of meeting of audit.
- vi. The auditors comply with the time schedule provided by the FSSAI as guidance document relevant to industry for hygiene rating
- vii. Auditors comply with the safety requirements and other conditions that may be very specific to the FBO while auditing their production or manufacturing areas.
- viii. The auditor takes the responsibility of his personal safety during the audit.
- ix. The auditor does not demand other than audit fees anything by way of reimbursement for travel, accommodation, etc. unless agreed between him/her & FBO
- x. The auditor misuses the name of FSSAI directly or indirectly to harass the client
- xi. Auditor discloses his or her identity with the proper evidence on demand in clients place when audit is done as per requirement of client’s place.
- xii. Auditor always referring with auditee on any doubt which is likely to arise and record the explanation properly.
- xiii. Auditors prepare themselves before going for the audit
 - 1. Auditors prepare themselves before going for the audit. The following points are taken care using the checklist of auditor’s preparation checklist.
 - 2. Ensure that all measuring instruments carry during the audit.
 - 3. The hygiene auditors use opening and closing meeting agenda strictly.
 - 4. Complaint handling process, confidentiality, impartiality, independence, and sampling protocols addressed during the opening and closing meeting mandatorily.
 - 5. The auditor confirms that the audit agreement is in place.
- xiv. The auditor carries the calibrated measuring instruments (Thermometer, flashlight, magnifying lens, and stopwatch) from Insight LLP. If the auditor is continuously traveling and able to take the instruments from office, then the use of instruments of FBO is allowed. While using the FBO instruments, the conditions are noted as follows.
 - 1. The hygiene auditor does an independent measurement.

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2. The hygiene auditor ensure that only calibrated equipment is used.
3. Any falsification/adjustment in the instrument by the FBO to mislead the auditor may lead to cancellation of the audit.
4. The informed consent for using the instrument is obtained from the FBO before the audit.
5. The availability of such instruments is confirmed before reaching the client site.

Complaints and Appeals.

1. We have a documented process to receive, evaluate and make decisions on complaints.
2. A documented process for handling complaints is available to any interested party upon request.
3. Upon receipt of a complaint, the HRAA is confirm whether the complaint relates to audit activities for which it is responsible and, if so, deal with it.
4. We are responsible for all decisions at all levels of handling complaints.

Appeals

Appeals against the decision of the HRAA to be first forwarded to the concerned HRAA, if unresolved to QCI, and if not satisfied then the applicant may appeal to FSSAI. The timeline for the resolution of the appeals is under:

1. HRAA- 15 days after appeal is made.
2. QCI- 15 Days after appeal is made.
3. FSSAI- 15 days after appeal is made.

Records

- Hygiene audit plan, CR/F20/0
- Hygiene audit schedule, CR/F30/0
- Hygiene audit checklist cum report, CR/F23/1
- Hygiene audit NC report, CR/F09/1
- Mentoring, onsite monitoring and audit authorization form, HR/F07/0
- Audit agreement, CR/F31/0

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