FOOD SAFETY CULTURE

ARE FOOD SAFETY MANAGEMENT SYSTEMS ENOUGH?

Conrad Choiniere, PhD

FDA Deputy Director for Regulatory Affairs (Acting) at CFSAN

conrad.choiniere@fda.hhs.gov

Vanessa Coffman, PhD

Director of the Alliance to Stop Foodborne Illness

vcoffman@stopfoodborneillness.org

Lone Jespersen, PhD

Principle at Cultivate SA

lone@cultivatefoodsafety.com

Lily Yasuda

Manager of the Alliance to Stop Foodborne Illness

lyasuda@stopfoodborneillness.org

In Brief

On their own, food safety management systems are not sufficient to maintain a comprehensive commitment to food safety. Management systems focus on "what" an organization should do and are usually driven by a compliance mindset. Audits, regulations, and programs are all examples of the concrete, quantitative benchmarks used to measure success. However, these systems must go hand-in-hand with a mature food safety culture. Culture is driven by social norms that are modeled but not always explicitly stated or written down. Behaviors, attitudes and expectations drive culture, which in turn creates the "why" of an organization. By fostering food safety management systems and food safety culture in tandem, businesses stand a greater chance of minimizing risk, and maximizing overall transparency, communication and respect across their team.

Key Learnings

Although related, food safety management systems and food safety culture are two distinct, yet complimentary facets of a mature food safety infrastructure

Food safety management systems encompass compliance driven behaviors which ensure that programs, data, and technology follow regulation, while food safety culture consists of shared values, beliefs, and norms

In order to be most effective, food safety management systems should be bolstered by food safety culture

A mature food safety culture necessitates transparency and trust, so workers at all levels can feel comfortable sharing potentially difficult feedback

Systems and culture can overlap, but are two <u>unique</u> concepts

Food safety management systems are often conflated with food safety culture, but the two are in fact distinctly different.

Food safety management systems are the programs, data, and technology used by food companies to ensure food is safe. They may include a set of written procedures which define the range of actions taken by the food business operator to ensure that the food produced is of the required quality and legally compliant. An example of a food safety management system is HACCP.

By contrast, food safety culture is an organization's shared values, beliefs, and norms. It also takes into account psychosocial risks, such as an employee's perceived job control, role clarity, relationships, and managerial support. Unlike a HACCP plan, which asks if food is safe to consume, psychosocial risks ask: Is there the ability to complete work tasks within normal hours? Do employees feel able to speak up when they see a food safety problem? Do employees understand why certain tasks must be properly completed? If management systems focus on the "what," culture emphasizes the "why." Although both are important, it's the "why" of culture that has the ability to empower workers to see themselves as active players in the organization. Without a mature culture, workers may lack the context to fully understand why certain standards or protocols are in place, which in turn may cause them to become less invested in maintaining those standards.

Food Safety Management Systems

-The "What" of food safety
-Driven by compliance and regulation
-Programs, data and technology used to ensure food is safe.

Food Safety Culture

-The "Why" of food safety

-Driven by social norms, beliefs, values

## How to integrate psychosocial factors into hazard analysis

Traditionally, food safety risk is assessed on the intersection of two metrics: severity and likelihood. **Severity** measures the negative impact of a hazard, while **likelihood** measures the probability of that hazard occurring.

However, it is imperative to also consider the impact of psychosocial factors. Psychosocial refers to factors impacting the individual's perception of manager and peer support and control over food safety tasks (to name a few). In practice, Psychosocial hazards can be related to retention of critical staff, how the frontline leader supports individuals by listening and encouraging everyone to speak up if they need support, and how individuals are included in problem solving when there is a food safety problem in their area.

For example: let's imagine that the contamination of a product with cleaning chemical residue has a **moderate** severity (would result in a product recall), and the company has determined there is **low** likelihood of contamination occurring. Under a traditional hazard assessment, the overall grade of risk would be deemed "moderate." However, psychosocial factors could influence the actual likelihood of a negative outcome. If cleaning protocols are communicated merely as orders (e.g., "You have to keep this product away from food contact surfaces"), workers may lack the context to see why this practice matters, which could inadvertently heighten the possibility of contamination. However, if the same protocol is framed through the lens of values (e.g., "You and your team play an essential role in shaping our cleaning culture and this product can make children sick if it ends up in our food"), workers can be motivated towards better performance, and in doing so, reduce the risk of a contamination event.

Psychosocial refers to factors that impact the individuals **perception** of:
- Manager and peer support
- Personal impact and control over food safety tasks
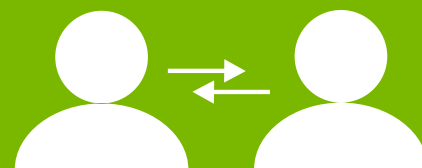
These factors can impact the retention of critical staff, how frontline leadership supports individuals by listening and encouraging everyone to speak up if they need support, and how individuals are included in problem solving when there is a food safety issue in their area

## It takes a comprehensive approach

Large or small, all organizations can benefit from integrating food safety management systems with food safety culture. When they are used to complement one another, that's when big shifts can occur. An example of this is shared by General Mills Director of Global Food Safety, Dr. Kelly Stevens. General Mills' food safety management system consists of a high level commitment to global food safety policies. These policies include food safety execution, verification, and metrics. Moreover, their culture is built upon active listening to differing perspectives, transparency, and an open recognition of both wins and challenges faced by their team. Leaders recognize the importance of flexibility and are able to pivot when one approach is not yielding the desired results.

One example of this comprehensive approach is their culture of handwashing. After analyzing handwashing metrics at a plant and noticing a decline in compliance, the General Mills management team investigated why. It turned out that there were many handwashing stations throughout the floor, which should have led to increased washing. However, because there were so many stations, people rarely saw their co-workers (or managers) washing their hands, because they had usually done so at a station out of view.

Management came to the solution of asking team members to wash their hands every time they passed a station, whether or not they needed to. This leading by example created the cultural shift that was needed to improve the metrics captured by the food safety management system.
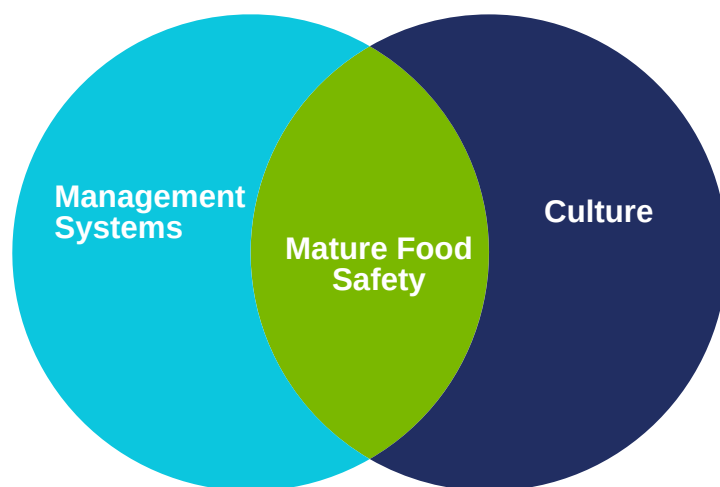
Using data to drive cultural improvements

Another example of interweaving culture and systems for big leaps forward is the use of scorecards. If a change in food safety or quality is picked up by a scorecard within a management system, sometimes the fastest and lowest cost way to find the root cause is to simply ask those on the frontline.

However, in doing so, you must be ready to receive honest feedback. General Mills Director of Global Food Safety, Dr. Kelly Stevens, recalls the impact this had on her early on in her career. Her first culture scorecard was not great; in fact, it was pretty bad.

Dr. Stevens recalls being embarrassed that her metrics were so low, but found the courage to share this data in a meeting, and thanked her teammates for honestly rating her performance. It was important for her to know where her blind spots were and how she could grow, and this growth was only possible if her team members could be candid. By respectfully receiving negative feedback, she was able to reinforce a culture of sharing not only the good things, but also the bad and the ugly. This in turn created a safe space for more junior employees to deliver potentially difficult feedback and normalized owning up to mistakes and calling out problems when you see them.

"Be ready to receive honest feedback. Mistakes are learning opportunities to grow and improve as an organization."

It's important to note that feedback isn't always solicited. If there is an outbreak or news story that involves your organization, you may be receiving data not picked up by your food safety management system. How you respond to this is crucial. You might also ask yourself, "How could we have avoided this?" or "How could my food safety management system be adapted to gather data needed to identify this failing?" At the end of the day, mistakes are learning opportunities to grow and improve as an organization. Being able to receive criticism, identify shortcomings, and address setbacks is key for any business to thrive. A mature food safety culture is contingent on leadership who can accept responsibility when necessary and focus on actionable steps to engage workers at all levels in raising the bar.

Acknowledgments

On February 14, 2024, the Alliance and FDA co-hosted a webinar as part of a series on food safety culture. The webinar greatly informed this paper and included the following panelist:

Dr. Kelly Stevens, Director, Global Food Safety and Regulatory, General Mills

We are grateful for their contributions and for sharing their stories as we all work towards stronger, more positive food safety culture throughout the food industry.

We also thank the following experts for their contributions to the webinar series and white papers:

Mitzi Baum (STOP)
Victoria Hall (FDA)
Gillian Kelleher (Kelleher Consultants)

Kelly Lombardo (STOP)
Melissa Monlux (Conagra Brands)
Donald Prater (FDA)

Roberta Wagner (IDFA)
Christopher Waldrop (FDA)

Disclaimer: This document summarizes discussions by participants in a webinar that took place on February 14, 2024, as well as best practices identified by participants related to organizational and food safety culture. This document reflects the views of the authors and should not be construed to represent FDA's views or policies.

Interested in learning more about cultivating a positive food safety culture?

Sign up for the Alliance's Food Safety Culture Toolkit:
https://stopfoodborneillness.org/food-safety-culture-toolkit/

View the joint FDA / Alliance Food Safety Culture Webinar Series:
https://www.youtube.com/@alliancetostopfoodborneillness