

# **GFSI Stakeholder consultation – transitioning successfully to a new model for the verification of auditor competence**

November 2021





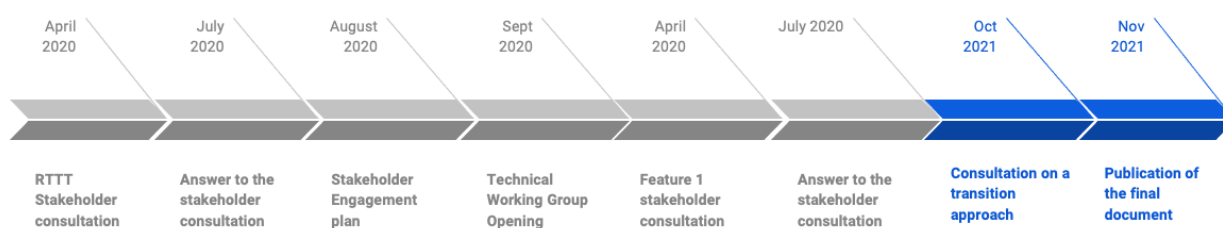
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# 1. Foreword – the Race to the Top framework

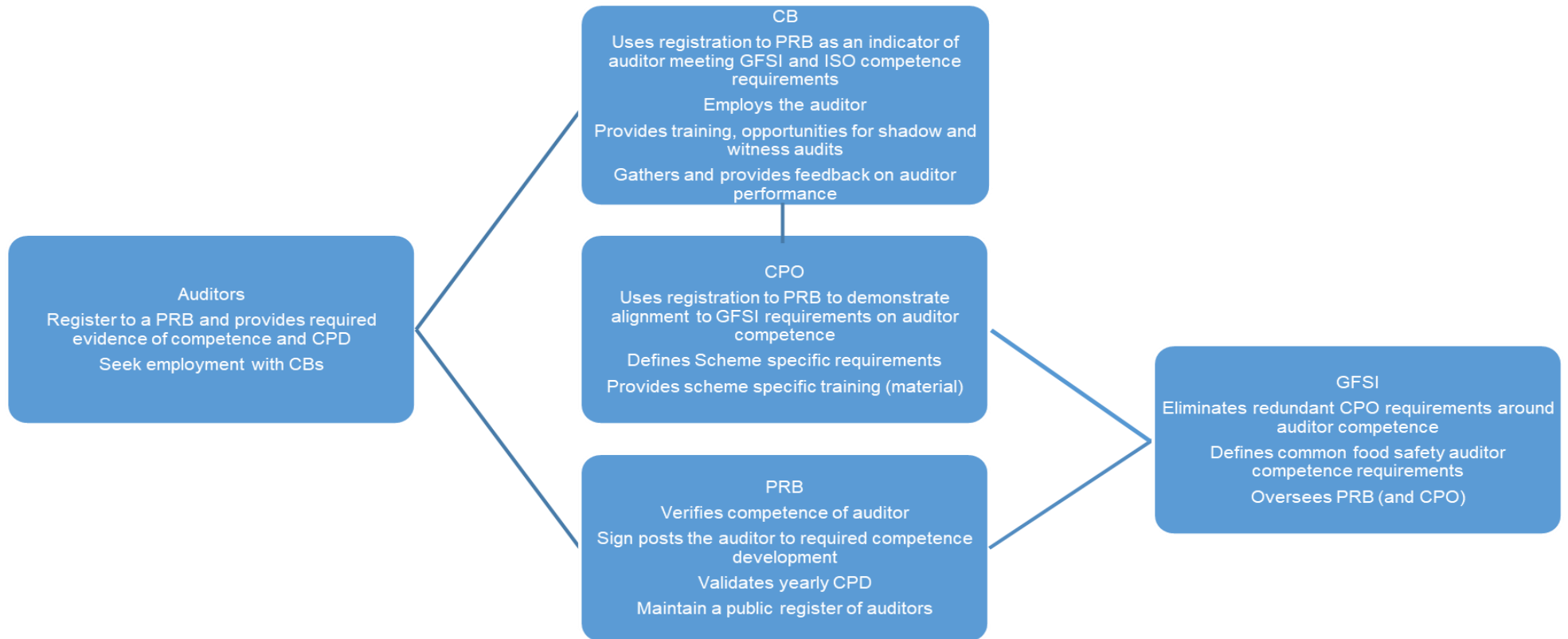
- 1.1. In March 2020, the Global Food Safety Initiative (GFSI) announced an ambitious programme of modernisation of GFSI named ‘The Race to the Top’ (RTTT).
- 1.2. The RTTT is intended to address the specific challenges GFSI has been facing in relation to trust and confidence in GFSI certification outcomes. Such challenges stemmed from the numerous food safety crises the world has seen in the headlines, eroding consumers’ trust in the safety of the food they buy, the brands they love and even the food industry at large.
- 1.3. Following this announcement, GFSI initiated the development of four specific features, shaped with the support of our Stakeholders, to address the aforementioned challenges:
  - ▶ Feature 1: Developing harmonisation and benchmarking requirements for providers of food safety auditor training and on-going Continuing Professional Development (CPD).
  - ▶ Feature 2: Moving to deliver a process of on-going assessment and continuous alignment to the GFSI requirements for CPOs.
  - ▶ Feature 3: Developing a collaborative approach to the management of Certification Bodies between CPOs, Accreditation Bodies and GFSI.
  - ▶ Feature 4: Developing a certificate platform - enabling access to certificate data of all FBOs certified to a GFSI-recognised Programme.
- 1.4. Since March 2020, and the definition of the RTTT framework, GFSI, supported by our entire community, our Steering Committee members, and our CGF Board sponsors, has worked tirelessly to deliver these four features.
- 1.5. The consultation presented to you in the present document represents the last step in the delivery of feature 1 before its implementation is initiated (see figure 1).

Figure 1: the journey from ideation to implementation



- 1.6. Feature 1 introduces a new approach on the qualification of food safety auditors (see figure 2). It aims at facilitating entry into the profession of auditing through:
  - ▶ A mutualisation of auditor qualification efforts against GFSI’s current Requirements to reduce redundancies and burden.
  - ▶ A focus on competence (knowledge, skills and behaviours) to allow candidates to come into the profession with equivalent competence gained through different career paths.
  - ▶ The establishment of an attractive profession offering a career professional pathway through professional development.

Figure 2 Schematic of outcome of work to date on new scheme for assuring the competence of food safety auditors





- 1.7. Practically, GFSI is setting up a new Recognition Programme for Professional Recognition Bodies, organisations dedicated to the verification and development of personnel competence. In the new approach, GFSI-recognised Professional Recognition Bodies will assume the verification of food safety auditors against competence requirements common to all GFSI-recognised CPOs.
- 1.8. Those common competence were identified by a GFSI Technical Working Group between October 2020 and February 2021, subjected to a public stakeholder consultation in April and May 2021, and documented in the new Benchmarking Requirements dedicated to Professional Recognition Bodies.
- 1.9. The new Benchmarking Requirements will exist alongside the current GFSI Benchmarking Requirements dedicated to Certification Programme Owners. For clarity, in the rest of the document:
  - ▶ The CPO Benchmarking Requirements are those currently existing GFSI Benchmarking Requirements used to assess and recognise Certification Programme Owners,
  - ▶ The PRB Benchmarking Requirements are those new GFSI Benchmarking Requirements created as part of feature 1 of the RTTT and that will be used to assess and recognise Professional Recognition Bodies.

## 2. Objectives of this consultation and how to participate

- 2.1. GFSI is very pleased to invite all interested stakeholders to take part in this latest consultation related to feature 1 of the RTTT.
- 2.2. The objective of this consultation is to explore the arrangements GFSI should consider ensuring:
  - 2.2.1. A successful transition to the new model defined by feature 1 of the Race to the Top,
  - 2.2.2. Coherence of the new model with the current GFSI CPO Benchmarking Requirements.
- 2.3. As it represents significant changes to the certification ecosystem, managing and enabling the transition from the current situation to this new model is critical to mitigate any disruption. GFSI is committed to defining effective transition arrangements to provide:
  - ▶ A minimised burden on the current certification ecosystem, in line with the feature 1 objective,
  - ▶ An optimised transition period to deliver the benefits of the new model to all affected stakeholders,
  - ▶ Momentum behind the new arrangements.
- 2.4. The GFSI Steering Committee will use the responses to this consultation to define the appropriate transitional arrangements. Those will be published alongside the new GFSI PRB Benchmarking Requirements.
- 2.5. This consultation is seeking views on the transition arrangements under five headings:
  - ▶ The overall transitional arrangements
  - ▶ The requirements for Professional Recognition Body (PRBs)
  - ▶ The implications for auditors
  - ▶ The requirements for CPOs
- 2.6. This document sets out what GFSI believes the issues are facing each stakeholder group, GFSI proposals for the transition arrangements, and what specifically GFSI would like your views on.
- 2.7. To participate, please read this document carefully then complete the feedback form published at <https://www.surveymonkey.com/r/H69GMJT>
- 2.8. This consultation will be open until noon CET on the 26th November 2021. Please note that any responses received after this deadline may not be considered.
- 2.9. This is an open consultation, please feel free to circulate it to others within your organisation and network who may be interested in responding to it.
- 2.10. Lastly, when referring to auditor qualification criteria, this consultation only refers to those criteria included in the GFSI PRB Benchmarking Requirements, and excludes any CPO or CB specific criteria, in line with the scope of the new approach.

## 3. The overall transition arrangements

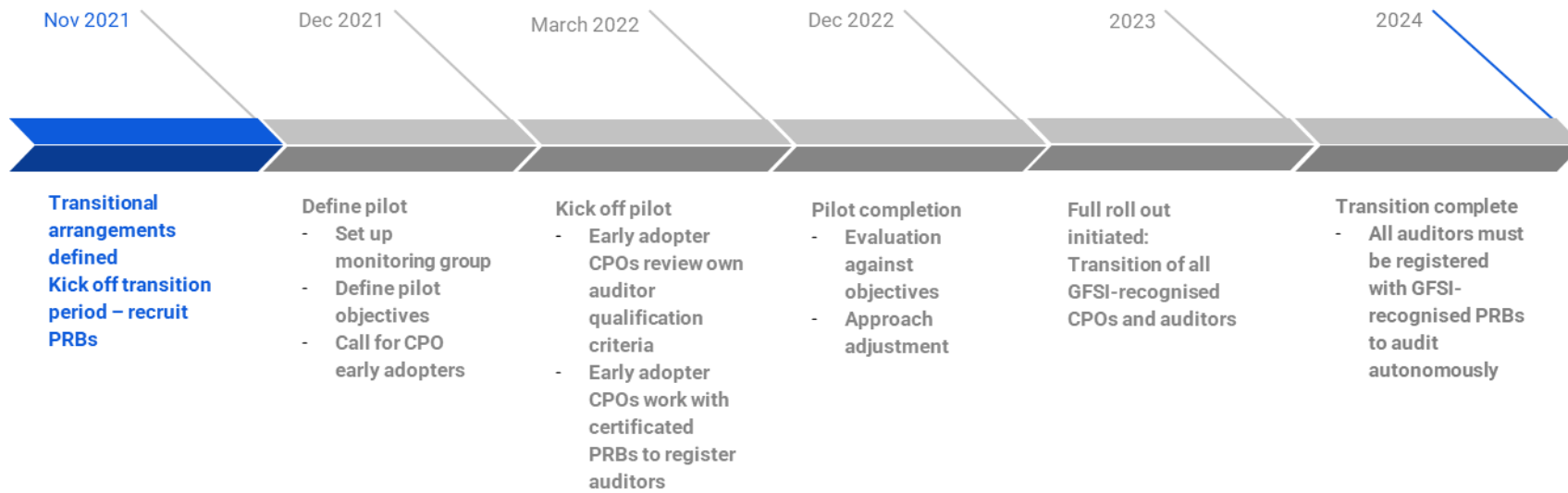
### The issues

- 3.1. GFSI recognises that the new arrangements represent a significant change and cannot be achieved overnight, and that a transition period is necessary to achieve the desired outcomes.
  - ▶ If the period is too short, then this will not allow time for change
  - ▶ If the period is too long, the arrangements will not be given the priority they need, leading to a protracted continuation of the status quo with its associated challenges.
  
- 3.2. GFSI also recognises that this new approach has been developed theoretically and although similar models in the food safety community do exist, they are not the mainstream approach. There is a need to validate the proposal in a practical environment and to evaluate it against the objectives of the new approach namely to facilitate entry into the profession of auditing through:
  - ▶ A mutualisation of auditor qualification efforts against the GFSI's current Requirements to reduce redundancies and burden.
  - ▶ A focus on competence (knowledge, skills and behaviours) to allow candidates to come into the profession with equivalent competence gained through different career paths.
  - ▶ The establishment of an attractive profession offering a career professional pathway through professional development.

### What is proposed

- 3.3. An overall transition period will be established to allow time for:
  - ▶ Professional Recognition Bodies to apply for and achieve GFSI recognition,
  - ▶ a pilot with early adopters to validate the approach against its objectives,
  - ▶ all auditors and CPOs to transition to registration with PRBs.(see figure 3)

Figure 3: proposed timeline for the transition period







- 3.4. The proposed purpose of the pilot will allow the evaluation of:
- ▶ the clarity and practicality of the PRB Benchmarking Process and Requirements,
  - ▶ the delivery of the objective laid in paragraph 3.2,
  - ▶ The identification of any adjustments to the proposal prior to its universal adoption.
- 3.5. Any volunteer CPOs will be welcome to take part in the pilot with PRBs who will have gained GFSI recognition. Arrangements for CPO and PRB transitions are addressed in sections 4 and 5 respectively.
- 3.6. A monitoring group will be established to monitor progress, advise GFSI and disseminate learning and good practice.

## **We would like your views on**

- 3.7. The overall length of the transition arrangements
- 3.8. The purpose and measures of success of the pilot
- 3.9. The membership of the monitoring group

## 4. The requirements for PRBs during the transition process

### The issues

- 4.1. The transition arrangements described in section 3 of this consultation requires GFSI-recognised PRBs.
- 4.2. To apply for GFSI recognition, PRBs need to satisfy eligibility criteria defined in the GFSI Benchmarking Requirements, including that:
  - ▶ The Professional Recognition Body is a legal entity,
  - ▶ The Professional Recognition Body can demonstrate impartiality from any food safety certification, conformity assessment, training and / or Certification Programme Owner activities,
  - ▶ There is endorsement from a minimum of three organisations committing to the Professional Recognition Body, demonstrating the market need for their Professional Recognition Programme,
  - ▶ The Professional Recognition Body shall be accredited against ISO/ IEC 17024 by an Accreditation Body member of the International Accreditation Forum (IAF) and signatory to the Multilateral Recognition Arrangement (MLA) (see <https://iaf.nu/en/recognised-abs/>),
  - ▶ The Professional Recognition Body can demonstrate experience in establishing and running a successful Professional Recognition Programme for at least 100 registrants (but not necessarily dedicated to auditors or food safety),
  - ▶ The Professional Recognition Programme is established and is not undergoing any significant changes,
  - ▶ The Professional Recognition Body does not have any practices deemed as restricting access to or choice within the market they operate in,
  - ▶ The Professional Recognition Body has completed the GFSI self-assessment form to demonstrate that it is in alignment with the GFSI Benchmarking Requirements.
- 4.3. GFSI anticipates that auditors will only want to register with GFSI-recognised PRBs, to avoid the risk of being registered with a PRB who failed their GFSI assessment and having to repeat the exercise with another PRB.
- 4.4. As a consequence of 4.3, PRB applying for GFSI recognition at the beginning of the transition period may not be in a position to satisfy all of the above eligibility criteria. It may also create difficulties for GFSI to apply the full Benchmarking Process, as part of it relies on reviews of registered auditors' records.



## What is proposed

- 4.5. Auditors will only be expected to register to a GFSI-recognised PRB.
- 4.6. Concessions to the GFSI Eligibility criteria and Benchmarking Process will identified and applied during the transition period.
- 4.7. PRBs applying for GFSI recognition during the transition period will benefit from the above concessions for the duration of the transition period.

## We would like your views on

- 4.8. The concessions GFSI should consider applying to applicant PRB during the transition period against the PRB Benchmarking Process.
- 4.9. The concessions GFSI should consider applying to applicant PRB during the transition period against the GFSI Eligibility criteria.
- 4.10. What should happen to those PRBs who do not meet full criteria by the end of the transition period, and their registrants.

## 5. The implications for auditors during the transition process and beyond

### The issues

- 5.1. An estimated 8000 auditors work for GFSI-recognised CPOs today. They are currently considered competent to practice.
- 5.2. To transition to the new model, these auditors will be asked to submit evidence of their competence to a GFSI-recognised PRB of their choice. This may be perceived as a burdensome and somewhat unnecessary exercise and lead auditors to leave the profession.
- 5.3. Various options have been considered by GFSI including:
  - 5.3.1. grandfathering auditors who have been auditing for a predefined number of years, and only require registration for new auditors, or
  - 5.3.2. allow a transition period for all auditors to register to a PRB
- 5.4. In practice option 1 defers the implementation of the new approach until the existing auditors who do not meet the new criteria are no longer working. In the second option, it is only deferred until the end of the transition period.
- 5.5. In addition, some of these auditors may not meet the proposed criteria established by the GFSI recognised PRBs. Those auditors will need a mechanism to continue working whilst they work with a GFSI-recognised PRB to meet their proposed criteria.

### What is proposed

- 5.6. By the end of the transition period defined in section 3, all auditors will be registered with a GFSI-recognised PRB.
- 5.7. During the transition period, auditors may continue to work on the basis of being qualified under the current system, until they successfully register with a GFSI-recognised PRB.
- 5.8. During the transition period, auditors will be able to refrain from adhering to the current system as soon as they register with a GFSI-recognised PRB and meet the requirements of the new approach.
- 5.9. During the transition period, GFSI will investigate the value of defining a role of junior auditors within the PRB Benchmarking Requirements to support auditors in their transition to the new approach.
- 5.10. At the end of the transition period, auditors who have not met the criteria of a GFI-recognised PRB will be allowed to continue to operate as junior auditors under supervision of fully registered auditor while they are supported by the PRB to achieve.



## We would like your views on

- 5.11. Whether the proposal that during the transition period, all auditors are considered competent and allowed to continue auditing if not registered to a GFSI-recognised PRB, is acceptable.
- 5.12. If and how auditors should be able to refrain from adhering to the current system as soon as they have registered with a GFSI-recognised PRB and meet the requirements of the new approach.
- 5.13. The potential definition of a role of junior auditor.

## 6. The Requirements for CPOs and CBs during the transition process and beyond

### The issues

- 6.1. If the CPOs and the CBs maintain their current criteria for qualifying auditors as the requirements for registration to a PRB is introduced, auditors will be burdened with duplicated requirements to demonstrate their competence.
- 6.2. GFSI-recognised CPOs are however expected to continually comply with the GFSI Benchmarking Requirements: version 2020 of the GFSI CPO Benchmarking Requirements does not acknowledge the existence and role of PRBs and put the responsibility for auditor qualification fully on CPOs and CBs.
- 6.3. In section 5, we explored how auditors will register to GFSI-recognised PRBs. As this happens, the responsibility for the auditor verification against the GFSI Requirements will transition from CPOs and CBs to those PRBs. CPOs will then bear risk of non-compliance with the GFSI Benchmarking Requirements unless they maintain their own process with their CBs; this would be against the objectives of the new approach.
- 6.4. Therefore, GFSI is seeking ways to avoid duplication of information processing and ensure that the objective laid in 1.6.1 is achieved: “A mutualisation of auditor qualification efforts against the GFSI’s current Requirements to reduce redundancies and burden”.

### What is proposed

- 6.5. By the end of the transition period, CPOs will be required to only employ auditors registered with an approved PRB.
- 6.6. By the end of the transition period, GFSI will have reviewed its CPO Benchmarking Requirements, specifically section 4 addressing CB personnel competence, and remove any duplication with the PRB Benchmarking Requirements applicable.
- 6.7. By the end of the transition period, CPOs will have reviewed their qualification criteria for auditors, to eliminate any duplications with the PRB Requirements, in line with the outcome of 6.6.
- 6.8. During the transition period, GFSI will allow CPOs to use registration to a GFSI-recognised PRB to demonstrate compliance with the GFSI CPO Benchmarking Requirements.

### We would like your views on

- 6.9. The mechanisms to minimise duplication of efforts during the transition period
- 6.10. The impact on GFSI CPO Benchmarking Requirements
- 6.11. The impact on GFSI-recognised CPOs and CBs at the end of the transition period.



## Appendix 1: reference documents

- A1.1. Response to the consultation on the RTTT framework: definition of ambitions and objectives. [https://mygfsi.com/press\\_releases/8089/](https://mygfsi.com/press_releases/8089/)
- A1.2. Response to the consultation on the proposed Benchmarking Requirements for Professional Recognition Bodies. [https://mygfsi.com/press\\_releases/gfsi-publishes-response-to-auditor-training-professional-development-stakeholder-consultation/](https://mygfsi.com/press_releases/gfsi-publishes-response-to-auditor-training-professional-development-stakeholder-consultation/)
- A1.3. GFSI Benchmarking Requirements for Certification Programme Owners. <https://mygfsi.com/wp-content/uploads/2020/02/GFSI-Benchmarking-Requirements-v2020.1-3.zip>