

Internal Audits & Inspections

Definition

Internal audits are an in-house check to identify gaps or deficiencies in the SQF System.

Applicable Code Requirements

1. 2.5.4
2. 2.1.2.1 iv.
3. 2.5.3.1

Review Glossary Terms

1. Audit Checklist
2. Competence
3. Corrective Action
4. Exempt
5. Non-conformance
6. N/A
7. SQF System
8. System Elements

Implementation & Audit Guidance

What does it mean?

This element requires the site to audit the activities in their System on a regular basis to ensure that everything is running as intended. The internal audit program should include all aspects of the system elements and the good manufacturing modules at least annually. The internal audit can be broken down into multiple pieces and conducted throughout the year to meet the annual requirement. However, all elements must have been audited at least once. It may be necessary to update the audit schedule based on customer complaints, internal or external food safety events such as recalls or regulatory warning letters, or internal or external audit results.

This program requires a document(s) that outlines the methods and responsibilities, schedule, and process for completing the internal audit all the way through to verification of corrective actions.

For internal audits to be effective, staff conducting internal audits must be trained in internal auditing techniques, information gathering and objective observation. This training need not be "formal" training provided by an external source. Internal auditor training covers internal audit procedures, including the planning and scheduling of internal audits, preparing internal audit reports, and initiating and following up on audit findings. Internal audits should combine several information gathering techniques, including interview of personnel, review of records and observation of current conditions.

To ensure the objectiveness of the internal audit the site is required, where possible, to use personnel who are separate from the area being audited to conduct internal audits. The inclusion of the words "where possible" illustrates that in the case of some very small suppliers this may not be possible. In such cases, the site is required to demonstrate that the alternative internal audit arrangement meets the objective of this requirement and is communicated to all affected parties.

Finally, the outcomes of all internal audits, including any corrective actions taken, must be recorded. Any audit tool that is developed by the supplier can be utilized to perform the internal

audits provided it covers the required areas and programs. Records of internal audits should be included in your document control and record policy.

Internal audit results are communicated and included as a part of the management review process.

Why is it in the Code & why is it important?

This is a mandatory clause.

Internal audits help the site to identify faults in their System so that it can be improved. The internal audit program is a verification method and when used properly, can identify risk, areas for improvement and/or needed corrective and preventative actions prior to an external audit or the occurrence of a food safety event.

See RIO Chart on following page.

RIO Road to Audits (Records, Interviews, and Observations)

Records	Interviews	Observations
<p>The following are examples of records and/or documents to assist in the implementation and review of this topic:</p> <ul style="list-style-type: none"> ▪ Internal Audit Procedure ▪ Audit Schedule ▪ Audit Checklist or similar tool ▪ Audit Report ▪ Objective Evidence Gathered ▪ Corrective Action Reports ▪ Training Records ▪ GMP Inspection Reports ▪ Management Review Meeting minutes 	<p>The following are examples of people to interview to assist in the implementation and review of this topic:</p> <ul style="list-style-type: none"> ▪ Internal Audit Team ▪ SQF Practitioner ▪ Senior Site Management <p>The following are examples of questions to ask to assist in the implementation and review of this topic:</p> <ul style="list-style-type: none"> ▪ When was the last internal audit conducted? ▪ How does the site verify competency of the internal auditors? ▪ Explain how auditors are assigned to ensure independence of the function being audited. ▪ How is verification of corrective actions as a result of non-conformances identified in the audit completed? ▪ What is the frequency of the internal audits and the GMP inspections? ▪ How are the results of the internal audit communicated? ▪ What types of auditing techniques were covered in the internal auditor training? 	<p>The following are examples of observations to assist in the implementation and review of this topic:</p> <ul style="list-style-type: none"> ▪ An internal audit or facility inspection being conducted. ▪ Corrective actions from internal audits in practice.

Additional References

- SQFI Checklist (Excel): <https://www.sqfi.com/resource-center/sqf-guidance-tip-sheets-and-checklists/>