Food Safety Culture Risk Assessment

Definition:

Food safety culture is the shared values, beliefs, and behaviors that determine how everyone in an organization thinks about and approaches food safety, both formally (e.g., policies) and informally (e.g., daily decisions).

A food safety culture risk assessment systematically evaluates how effectively those cultural elements (values, behaviors, practices) support or hinder food safety objectives and identifies risks that poor culture could introduce into food safety systems.

As defined in GFSI (2018): "A food safety culture is the shared values, beliefs and norms that affect mind-set and behavior toward food safety in, across and throughout an organization."

PAS 320 (2023) emphasizes that culture should be:

- Understood in context,
- Governed and strategically planned,
- Monitored, measured, and continuously improved.

Implementation & Audit Guidance

What does it mean?

A food safety culture risk assessment means going beyond simply checking whether your processes are documented and technically compliant. It's about understanding whether your people's everyday behaviors, attitudes, and decisions actually support food safety in practice.

Food safety culture is how things are truly done "when no one is watching." It's the invisible layer of values, priorities, and informal habits that influences whether your food safety systems are followed—or ignored—under real-world pressures.

A risk assessment in this context systematically explores where cultural gaps could become food safety risks. For instance, even in a factory with perfect written procedures, you might discover that:

- Staff are afraid to stop a line when they spot a problem because they fear blame.
- Operators know rules exist but think they're unrealistic under production pressure.
- Supervisors skip hygiene checks because they're short-staffed.
- Temporary workers don't feel included in food safety communication.

These are cultural risks—uncertainties in attitudes, values, or behavior that could undermine food safety.

A food safety culture risk assessment seeks to identify and evaluate:

- Where culture supports food safety: e.g. confident reporting of hazards, visible leadership engagement.
- Where culture may undermine food safety: e.g. silence about problems, low morale, tolerance of shortcuts.

It's not simply about employees' knowledge—but whether they feel safe, motivated, and empowered to act correctly.

Food Safety Culture Risk Assessment Means:

- Assessing behavioral realities, not just documents.
- Identifying gaps between what's written and what's done.
- Prioritizing risks from cultural weaknesses.
- Taking proactive action to strengthen food safety culture.

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

The SQF Code added a specific requirement for a documented and maintained food safety culture assessment plan because industry experience—and major food safety failures—have shown that technical systems alone don't keep food safe.

Many past food safety crises involved facilities that were technically compliant on paper but suffered from:

- Poor communication
- A fear-based environment
- Tolerance of shortcuts under pressure
- Lack of accountability
- Leadership ignoring frontline concerns

The SQF Code recognizes that food safety depends on how people think, behave, and make decisions in daily operations. It requires companies to formally evaluate, improve, and demonstrate a living food safety culture as part of their certification.

Why It's Important:

Food safety is human-driven. Even perfect procedures fail if people don't follow them—or are afraid to speak up when something goes wrong.

Culture determines reactions under pressure. When under stress—like a tight production schedule—people fall back on what's normal and acceptable in their culture. A strong culture prioritizes food safety even when it's inconvenient.

Cultural weaknesses are hidden hazards. Problems like silent non-compliance, cover-ups, or "that's how we've always done it" attitudes can remain invisible until a major incident occurs.

Regulators and customers demand it. Global food safety standards (GFSI) now expect companies to measure and manage food safety culture. Retailers and large brands increasingly audit cultural factors alongside technical systems.

Your assessment plan should include:

Requirements	Implementation Approach
i. Effective communication strategies	- Map current communication flows. - Include multi-directional channels (top-down, bottom-up, peer-to-peer). - Schedule regular town halls, toolbox talks, and digital updates. - Use multiple formats (visuals, languages) for clarity.
ii. Comprehensive training programs	- Conduct cultural awareness training for managers and staff. - Integrate culture topics into technical food safety training. - Use real examples and storytelling for impact. - Include human factors, attitudes, and behavior change principles.
iii. Mechanism for feedback	- Implement anonymous surveys (digital or paper). - Include culture-focused questions in daily meetings.

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	- Encourage reporting without fear of blame. - Establish a process for acting on feedback quickly.
iv. Regular measurement and evaluation	- Develop cultural KPIs (e.g., reporting rates, training participation, perception surveys). - Use maturity models (like PAS 320 or GFSI tables at the end of the Position Paper) to benchmark progress. - Audit not only systems but also attitudes and behaviors. - Report trends and integrate into Management Review.

Implementing a culture risk assessment involves:

- Interviews and observations: Talking to staff at all levels about their beliefs and experiences.

- Surveys and diagnostics: Anonymous questionnaires measuring attitudes, trust, and engagement (e.g., "Do you feel comfortable reporting mistakes?").

- Behavioral data: Checking incident trends, near-misses, and audit findings that may have cultural roots.

- Maturity models: Tools like PAS 320 or the GFSI maturity tables help benchmark cultural progress from "reactive" to "proactive."

Examples

Positive Culture:

- Staff immediately report a leaking pipe near product zones without fear of punishment.

- Leadership walks the floor regularly and asks open questions about food safety concerns.

Weak Culture:

- Operators keep silent about discovering foreign material because they fear losing their jobs.

- A production manager yells at staff who slow down the line for quality checks.

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

Records	Interviews	Observations
The following are examples of records and/or documents to assist in the implementation and review of this topic:	The following are examples of people to interview to assist in the implementation and review of this topic:	The SQF auditor may observe the following or similar activities: On-floor observations to compare behavior vs. documented systems:

Records

- Documented Food Safety Culture Assessment Plan
  - Includes communication, training, feedback, and measurement elements
- Food Safety Culture Policy (if issued separately)
- Food Safety Culture Surveys
  - Copies of blank surveys
  - Completed survey results and data analysis
  - Action plans based on survey outcomes
- Internal Audit Reports
  - Records of internal audits specifically evaluating food safety culture
  - Findings, corrective actions, and follow-up
- Training Records
  - Training content/materials that include food safety culture topics
  - Records of staff participation (dates, attendees, signatures)
  - Competency assessments
- Communication Materials
  - Newsletters, posters, bulletins, digital screens, and meeting minutes discussing food safety culture
- Feedback Mechanism Records
  - Logs from suggestion boxes
  - Digital app reports or feedback entries

Interviews

- Senior Management
  - How do you define food safety culture here?
  - What's your role in promoting food safety culture?
  - How is food safety culture measured?
  - What actions have been taken when cultural risks were identified?
- Supervisors & Middle Managers
  - How do you encourage staff to raise food safety concerns?
  - Can you share an example of acting on feedback from frontline employees?
  - How is training delivered on cultural expectations?
- Operators & Frontline Staff
  - How comfortable are you reporting mistakes or hazards?
  - Has anyone ever made you feel unsafe speaking up?
  - Do you feel leadership cares about food safety?
  - Are training and communication clear and helpful?
- Temporary Staff / Contractors
  - Do you feel included in food safety discussions?
  - Are you trained on food safety culture?
  - Are you treated the

Observations

- Check whether food safety signage and communication are visible and updated
- Observe meetings:
  - Are they participative or purely top-down?
  - Do people feel safe asking questions?
- Observe staff during operations:
  - Are food safety practices followed without being told?
  - Are employees correcting each other respectfully?
- Watch interactions between supervisors and staff:
  - Is feedback given constructively or punitively?
- Look for signs of fear or silence:
  - Do staff appear hesitant to speak in front of auditors or management?
- Inspect high-pressure situations:
  - Does production override food safety rules?
- Check team dynamics:
  - Are new or temporary staff integrated or isolated?
- Observe physical environment:
  - Are posters dusty and outdated?

Records	Interviews	Observations
• Records of issues raised, and actions taken ▪ Management Review Minutes • Evidence that food safety culture KPIs are reviewed by leadership ▪ Incident/Deviation Reports • Trends or patterns suggesting cultural issues (e.g., repeated non-reporting of deviations) ▪ Corrective Action Reports • Cultural or behavioral root causes documented (e.g., "fear of reporting") ▪ KPIs/Scorecards for culture (e.g., reporting rates, training participation) ▪ Meeting Records • Agendas and minutes from: • Toolbox talks • Safety culture workshops • Town hall meetings	same as permanent employees?	• Are feedback tools accessible (e.g., suggestion boxes unlocked and in use)?

Additional References

1. PAS 320:2023 – Developing and Sustaining a Mature Food Safety Culture – Guide. British Standards Institution (BSI), 2023. https://www.bsigroup.com/en-US/insights-and-media/insights/brochures/pas-320-developing-and-sustaining-a-mature-food-safety-culture/

2. GFSI – A Culture of Food Safety – Position Paper (V1.0, 2018). Global Food Safety Initiative. https://mygfsi.com/?s=food+safety+culture

3. ISO 31010:2019 – Risk Management – Risk Assessment Techniques. International Organization for Standardization (ISO). https://www.iso.org/standard/72140.html