

# Records

## Definition

Record retention is a part of the document control process to ensure that completed forms and other records are maintained in accordance with customer, company, and regulatory requirements.

## Applicable Code Requirements

- 2.2.3

## Review Glossary Terms

- None

## Implementation & Audit Guidance

### What does it mean?

The supplier must develop a written procedure documenting responsibilities for completing records (e.g., monitoring records, inspection, test records, etc.) and identifying those responsible for verifying the records. Employees who are responsible for monitoring and recording activities must be made aware of the importance of maintaining all records in a clear and legible manner and the importance of recording the information at the time the activity is performed. The employees responsible for monitoring critical food safety points (CCPs, CQPs) in the process are required to sign the record indicating the entry and the date it was made (or electronically authorize the entry). In addition, the supplier is required to ensure that the staff responsible for verifying food safety records sign and date each record they review as part of their verification activities (refer to 2.5.4).

Records must be retained under secure conditions as required by customer specifications and legislation. Records must be stored securely so that they will not be damaged so they can be retrieved for investigation purposes. The SQF Code states that records must be suitably authorized and must be stored as required by the corporation, customer, or legislation. Various roles within the business may be responsible for completing records, including those who are responsible for monitoring, testing, and/or auditing. Other staff members (including the SQF practitioner) may be responsible for verifying the accuracy of records, and one or more may be responsible for retrieving and storing records. All such individuals must be identified and made aware of their responsibilities.

Storage can be electronic, or paper based. The supplier must have the means to manage the electronic security of records, electronic signatures of monitors and reviewers, and the means for electronic review. On paper-based records, the use of correction fluid to address corrections is not recommended. A line through the inaccurate recording, with accurate recording and initials of the monitor is recommended.

There is no prescribed duration for the retention of records. For some suppliers, it may be prescribed by legislation, customer requirements, or insurance coverage. Apart from those requirements, the general rule is to retain records for the commercial shelf-life of the product (i.e., the maximum time before consumption). However, for short shelf-life products, suppliers must retain records beyond the next recertification audit, at a minimum.

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

2.2.3 is a mandatory clause.

Records are the information about processing operations recorded on forms, which must be clear, concise, legible, and accurate and includes external reports and documents that demonstrate conformance with the SQF code requirements.

### 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"> <li>▪ <i>Record procedure</i></li> <li>▪ <i>Record retention matrix</i></li> </ul>	<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"> <li>▪ <i>SQF Practitioner</i></li> <li>▪ <i>Document control specialist</i></li> <li>▪ <i>CCP/CQP operator</i></li> </ul> <p>The following are examples of interview questions to ask to assist in the implementation and review of this topic:</p> <ul style="list-style-type: none"> <li>▪ <i>What training have you received on completing, reviewing, or approving records?</i></li> <li>▪ <i>What do you do if you make a mistake recording information?</i></li> </ul>	<p>The following are examples of observations to assist in the implementation and review of this topic:</p> <ul style="list-style-type: none"> <li>▪ <i>Observe manufacturing personnel completing forms and/or verifying completed records</i></li> <li>▪ <i>Review the record retention location for paper and/or electronic records</i></li> </ul>