

## THE SPAR AUDIT



**The audit is based on R.638 and SPAR best practices. It is therefore a standard compiled by SPAR and assessed by an independent third party auditing company..**

**The assessment is conducted on a quarterly basis, therefore between January and December, a SPAR retailer will undergo four audits. The time between subsequent scheduled quarterly audits will be scheduled to be at least sixty days after the previous audit (at least one hundred and fifty days for DCs), allowing the Retailer enough time to close out all non-conformances before the next audit.**

## THE SPAR AUDIT



### Auditing Times

Stores shall be audited within normal “operational hours” during weekdays, Monday to Friday, unless other arrangements are agreed upon between the retailer and the auditing company’s Key Accounts Manager. No audit shall start after 4:00pm.

Store audits will not take place on public holidays and the auditing company shall try and avoid a store audit the day before a public holiday, however this is not always possible due to the location of the store (remote stores) and auditor’s traveling schedule or route. If this is the case a store is not allowed to abort the audit. Audits may take place before and after month end weekend.

Audits shall not take place on SASSA pay-out days at affected stores. These stores have been identified and listed by the region and this list is to be made available to the SPAR Group Food Safety Manager. The dates will include 3 weekdays from and including the official pay-out date of the month. This is subject to adjustment based off the SASSA pay-out days being adjusted.

Audits may not be scheduled on National high retail trading days e.g. Black Friday and consideration will be taken around peak season holiday destination stores that have been identified by the region and the list submitted to the SPAR Group Food Safety Manager. An audit will still take place within the quarter however sensitivity will be given around the timing thereof.

In the case of a retailer refusing an audit, the auditor should contact the Key Accounts Manager while on site. The auditor is not allowed to decide on whether to abort an audit – permission must be obtained from the SNR ROM and the SPAR Group Food Safety Manager shall be informed.

Justified aborted audits – the retailer will not be liable to pay the audit fee but will still receive an audit during the said quarter (if they are still trading), when:

- The auditor is in a life-threatening situation (e.g. riots/strike) on the day of the audit.
- When the store has been damaged 48 hours prior to the audit date.

Unjustified aborted audits – the retailer will be liable for the audit fee and the audit will be marked as failed on the Regional and National Management report. A further audit will be rescheduled within 14 days and the retailer will be liable for the cost of the initially aborted audit and the second audit, when:

- The retailer refuses an auditor to enter the premises.
- The retailer stalls the audit from commencing for more than 15 minutes after the arrival of the auditor.
- The retailer refuses an auditor due to renovations or a store revamp. If the retailer is open for business and trading the audit will continue. If the store has been closed and the Regional Operations Team have failed to notify the auditing company, the Regional Operations Team will cover the cost.

### The Audit Process:

Upon arrival at the store, the auditor should ask to meet with the retailer (owner), store manager or most senior manager present. The auditor will introduce him/herself and announce that an audit will take place, and that it would commence with an opening meeting.

The retailer (owner), store manager, most senior manager present must acknowledge the auditor’s arrival within 15 minutes of arrival, or the audit will be considered aborted.

The auditor will start with a short opening meeting, in which the auditor will make introductions to clarify roles and responsibilities, identify store activities that should be considered and agree on who shall accompany him/her during the audit.

If the store has a Food Safety Representative then he/she should be included in the opening meeting and accompany the auditor for the duration of the audit as well as the closing meeting.

The auditor will proceed with reviewing documents, procedures, records and policies. Samples for microbial testing will be collected. During the physical walk-through the auditor will verify compliance to each of the control points in the checklist, take temperature measurements and test compliance with each of the cleaning chemicals. The audit will also include interviewing individuals in the department. After the auditor has completed the audit activities, a closing meeting will be held with the responsible members of staff (preferably including the owner and/or the store manager and/or Food Safety Representative). The auditor will discuss all the non-conformances found during the audit and advise on how non-conformances should be closed out.

### **Consultative Audits**

A consultative audit can be requested by a retailer or by the SPAR Regional Operations Team at any time if a retailer is needing assistance with food safety auditing process and understanding. It is advised that the very first audit that takes place when a new site opens is a consultative audit. The purpose of a consultative audit is to provide the site with a practical understanding of the current audit compliance criteria. These audits will be conducted using the same audit template that will be used during the formal auditing audits.

The auditor will spend more time on site explaining details of the audit that are not fully understood, as well as writing more detailed comments at each control point, to help the site management to implement or correct aspects that are not complied with. Micro samples will take place as per formal audit criteria. The time allocated for a consultative audit will be longer than the formal audit and a score will be generated following the audit. The cost of the consultative audit will be higher than the group-discounted rates.

The retailer will receive a report on the online platform, and it will be titled a Consultative Audit. The audit score on consultative audits will not be used in the Regional and National Management report.

### **Audit Reports**

The Food Safety Assessment is conducted on a real time online audit platform. Once the auditor has completed the audit checklist and held the closing meeting, the auditor will close the audit off on the system, which will generate a Preliminary Report.

Preliminary results will be available immediately or within 24 hours after an audit (internet connectivity dependant). Once the auditor has submitted and uploaded the audit report, the site will receive an email alerting them to view the Preliminary Report. Micro samples will be submitted to the laboratory for analysis and 9 working days later the micro results will be released. During this time, should a retailer wish to lodge an appeal on one or more of the Food Safety Assessment findings, the dispute/appeals process must be followed. (See Dispute/Appeals section on page 9 for further details)

The Final report will be available on the online platform after 9 working days. The Final SPAR Food Safety and Hygiene Assessment report will be in pdf format and will be inclusive of:

- Food Safety and Hygiene audit results including scoring.
- Micro results including scoring.
- Final audit score.
- The summary of Non-Conformances (TOP 10, Critical, Major and Minor) per department.
- The full audit checklist with auditor's comments and scoring allocated to each question.

The official micro lab test results will also be included on the online platform, and a detailed audit report can be downloaded in excel format. Should a report not be received within the above-mentioned time frame, the store is to report this to the Group Food Safety Manager immediately.

Should any store change ownership, or when a new store opens or an existing store closes, it is the Regional Operational Team's responsibility to notify the Group Food Safety Manager and the auditing company's Key Accounts Manager via the online platform.



### Scoring of Audits and Micro test results

All Food Safety Assessment checklist questions have been allocated a score. The Food Safety Assessment checklist templates are grouped into sections (e.g. Produce, Butchery, Shop Floor departments) and then sub sections (e.g. personal hygiene, cleaning practices, merchandising) – each comprising of several control points that will be assessed during the audit.

The value of the control point is determined by the level of importance in terms of its impact on food safety and hygiene.

- TOP 10 control points are scored “10” points if compliant, “0” if not compliant or “NA” if not applicable.
- Critical control points are scored “10” if compliant, “0” if not compliant or “NA” if not applicable.
- Major control points are scored “5” if compliant, “0” if not compliant or “NA” if not applicable.
- Minor control points are scored “1” if compliant, “0” if not compliant or “NA” if not applicable.

Any Critical or TOP 10 control points that are non-compliant, will bear an additional penalty deduction of 1% to the total percentage of the section.

The sections are weighted according to the relevant impact of the risk of the section on the overall score. The sum of the weight of all sections should be 100.

If the store does not have a specific section (e.g. Fish shop and sushi preparation area), that section will be marked Not Applicable (N/A) and it will carry no weight.

The weight of the Not Applicable (N/A) section would be proportionally distributed to the remaining sections so that the total weight of all applicable departments will be 100.

The sum of the weighted scores of all sections gives the overall weighted score out of 100 (weighted percentage). The Food Safety and Hygiene Index has a maximum value of 80 and is determined by multiplying the weighted score by 80%.

**RETAIL FOOD SAFETY RESULTS - TABLE 1**

	Non Conformances			Audit Score			Weighted Score		Result
	Critical	Major	Minor	Achieved	Total	Achieved %*	Weight	score	
Cold Delicatessen		1		521	526	99.0	15	14.86	Pass
Hot Food Production / Serving Area	1			521	531	97.1	16	15.54	Pass
Coffee Shop				0	0	N/A	N/A	N/A	N/A
Butchery				527	527	100.0	14	14.00	Pass
Fish Shop & Sushi Presentation Area			1	535	536	99.8	14	13.97	Pass
Bakery			1	546	547	99.8	16	15.97	Pass
Produce	1	1	2	458	475	95.4	14	13.36	Pass
Shop Floor	2			87	107	79.3	3	2.38	Fail
Receiving & Back-up Storage	1	1	1	91	107	84.0	4	3.36	Pass
Staff Facilities		1		22	27	81.5	1	0.81	Pass
Documentation	3	1		220	255	83.3	3	2.50	Pass
* Note that an additional 15 is subtracted from the calculated Archived score for each Critical Non-Conformance							85.0	81.9	
Food Safety Score:								96.3%	
Food Safety Index (80):								77.1	Index out of 80

**In the example of Retail Food Safety results in Table 1 above:**

- 1.1 There was no Coffee Shop so it is marked N/A and has no impact on the overall score.
- 1.2 Hot Food had 1 Critical NC so 1% was deducted from the calculated score (98.1%) to reflect 97.1%.
- 1.3 The weight of the Coffee Shop was removed, so the total weighted score was divided by a lower total weight.
- 1.4 The Shop Floor score was below 80% and thus is indicated as a fail for the department.

**Microbial Test Scoring for Retail**

- 1.1. The micro samples that will be taken for retail stores are: 1 x food product sample, 2 x surface swabs and 2 x hand swabs.
- 1.2. The possible value of a test is 10, where no detection or a value below the threshold will score '10 = Pass' and when detected or above the allowed threshold, they will score '0 = Fail'.
- 1.3. The scores of the 2 hand swabs and the 2 surface swabs will both count out of 100% and make up 50% of the total retail micro score.
- 1.4. The food product sample tests will add up to 100% and make up the other 50% of the retail micro score.
- 1.5. The Retail Microbial Index will make up 20% of the overall score, which is determined by multiplying the Microbial Score by 20%.



**MICROBIAL TESTING RESULTS - TABLE 2**

Hand Swabs	Description	Test	Methord	Value	Score	Result
Butchery	Mary Malukeke, after washing	Escherichia coli	SOP-M-3F	10	0	Fail
Hot Food Production	Dora Fortuin, after washing	Escherichia coli	SOP-M-3F	10	10	Pass
Hand Swabs Score (%):					50%	
Surface Swabs	Description	Test	Methord	Value	Score	Result
Coffee Shop	Cold meat slicer blade	Total Aerobic Bacterial Count	SOP-M-1C	10	10	Pass
Cold Food Production	Working surface	Total Aerobic Bacterial Count	SOP-M-1C	10	10	Pass
Surface Swabs Score (%):					100%	
Combined Hand & Surface Swabs Score (%):					75.0%	
Food Sample	Description	Test	Methord	Value	Score	Result
Product:	Cooked Basmati Rice	Escherichia coli	SOP-M-3F	10	10	Pass
Batch Code:	Batch 12/213	Listeria monocytogenes	SOP-M-7B	10	10	Pass
Product date:	1 April 2020	Bacillus cereus	SOP-M-16B	10	0	Fail
Sell By date:	2 April 2020	Salmonella spp	SOP-M-9F	10	10	Pass
Best Before Date:	3 April 2020	Staphylococcus aureus	SOP-M-4F	10	10	Pass
Food Sample Score (%):					80%	
Overall Microbial Score (%):					77.5%	
Microbial Index (20):					15.5	Index out of 20

**In the example of Retail Microbial testing results in Table 2 above:**

2.1 The test result for the hand swab in the Butchery area produced a detection of E. coli that was higher than the threshold, as indicated in the Acceptable Limits of Microbiological test results in Table 3 below.

2.2 It is shown that the food sample had a level of Bacillus Cereus that was higher than the threshold, as indicated in the Acceptable Limits of Microbiological test results in Table 3 below.

**ACCEPTABLE LIMITS FOR MICROBIOLOGICAL TEST RESULTS - TABLE 3****Swabs**

Test	Test Method Used CPT	Test Method Used CPT	Result	Score
Total Aerobic Bacteria Count	S.O.P.M 1C	SOP-MJ-033	0-499 cfu/10cm <sup>2</sup>	10
			500-1000 cfu/10cm <sup>2</sup>	5
			>1000 cfu/10cm <sup>2</sup>	0
Escherichia coli	S.O.P.M 3F	SOP-MJ-033	0-9 cfu/110cm <sup>2</sup>	10
			≥10 cfu/10cm <sup>2</sup>	0
Listeria monocytogenes	S.O.P.M 7B	SOP-MJ-033	Absent	10
			Present	0
Bacillus cereus	S.O.P.M 16B	SOP-MJ-033	0-99 cfu/10cm <sup>2</sup>	10
			≥100 cfu/10cm <sup>2</sup>	0
Staphylococcus aureus	S.O.P.M 4F	SOP-MJ-033	0-9 cfu/10cm <sup>2</sup>	10
			≥10 cfu/10cm <sup>2</sup>	0
Salmonella spp.	S.O.P.M 9F	SOP-MJ-033	Absent	10
			Present	0

## Food Samples

Test	Test Method Used CPT	Test Method Used JHB	Maximum Limit (CFU/g)		Score
			Category 1	Category 2	
Escherichia coli	S.O.P.M 3F	SOP-MJ-153	0 - $\leq 10^2$	0 - 20	Up to max limit = 10 else 0
Listeria monocytogenes	S.O.P.M 7B	SOP-MJ-031	Absent	Absent	Up to max limit = 10 else 0
Bacillus cereus	S.O.P.M 16B	SOP-MJ-1026	0 - $\leq 10^3$	0 - 100	Up to max limit = 10 else 0
Salmonella spp	S.O.P.M 9F	SOP-MJ-158	Absent	Absent	Up to max limit = 10 else 0
Staphylococcus aureus	S.O.P.M 4F	SOP-MJ-1130	0 - $\leq 10^3$	0 - 100	Up to max limit = 10 else 0

## Food Sample Category

Category 1	Prepared products/meats intended for human consumption that have not been cooked in entirety (as a complete dish) or undergone any other treatment to reduce microbial load. Consumption and ready to eat without treatment or cooking
Category 2	Prepared products that have been cooked, heat-treated, or pasteurised and are intended for human

The micro limits in Table 3 above are guided by - The Compendium of microbiological criteria for food – September 2018. Food Standards Australia and New Zealand.

## What is Corrective Action?

Corrective action is the action taken to address an identified non-conformance in such a way as to avoid a repeat non-conformance. Sustainable corrective action should be applied; it should never be a “quick fix”. You would need to establish:

- What went wrong?
- Why did it go wrong?
- How can you fix it?
- How can you ensure that it does not re-occur?

The above is seldom rectified merely by disciplinary action; human negligence and errors may be the cause and, in this case, needs to be addressed. Sometimes the root cause is a combination of factors, so investigate thoroughly. To help identify how to act on non-conformances, follow the 6 steps below:

1. Analyse the non-conformance to understand the problem.
2. Investigate with the food safety management team/department manager why the problem occurred (root cause(s) of the problem).
3. Identify what immediate actions are required to correct the problem (correct action).
4. Identify what should be done to make sure that it does not continue or happen again (preventative action).
5. Implement these actions.
6. Arrange for training of staff on the change related to the preventative actions.

When a non-conformance is identified during an audit, it is documented on the audit report which generates a corrective action report ((CAR). Use this report to complete your corrective action feedback. Specific corrective actions have been identified to be approved by the Regional Operations Management team (ROM) within the limited time period. All corrective actions should be actioned by the retailers and the CAR must be viewed by the ROM on store visits as the reference for Food Safety discussions. The auditors will check that the corrective action has been completed on the following audit.

This is a valuable tool to prevent repeat non-conformances and to ensure effective, sustainable corrective action. The purpose of this procedure is to provide action taken. Should SPAR be faced with a serious customer complaint, a query on product quality (a possible complaint against a supplier) or an issue of safe food, we may need to prove due diligence.

Note: Corrective action is usually taken by the person in charge of the section. It is the manager's duty to confirm that the correct procedure was followed, as the manager is ultimately responsible and accountable. This is confirmed by the manager signing off/approving the relevant corrective action report.



### Microbial Testing

Surface and hand swab tests are taken to evaluate the effectiveness of the store cleaning programme, i.e. to see whether staff are washing hands correctly and implementing good hygiene practices (sanitizing) during food preparation. Food samples are analysed to confirm food handling and cooking procedures are being followed correctly.

As part of the hygiene and food safety audits, auditors shall select a ready to eat food sample i.e. cooked product made in store, that has gone through several preparation steps or has many components to the dish e.g. rice, pureed or roasted butternut, creamed spinach. Other products that are highly recommended to test are heat-treated products, cold consumption or pasteurized products and salads/desserts. Auditors will avoid raw samples unless specifically requested.

Before taking any samples of food, water, surface swabs and hand swabs, the auditor must wash/sanitize and dry their hands using the readily available hand washing commodities in the store. The auditor should also use the appropriate PPE and will prepare and label sample bags and swabs in advance.

Sampling techniques identified by the auditor must not at any stage during the sampling process intentionally modify the intrinsic microbial flora of the product in any way (such as via contamination from sampling tools or the environment). An auditor may use a sanitized spoon, tongs or other available serving utensils or alternatively a sample bag may be used to remove the product by reversing it over the hand and then reversing the bag again over the product.

The sample should be at least 150g of food product or 130ml to 180ml of water/liquid and be placed in a sterile Ziploc fridge/freezer bag. The auditor will always ensure that the bag is sealed and roll the top of the bag to minimise the seal opening.

A surface swab area of 10cm<sup>2</sup> (5cm x 2cm) on flat surfaces. When swabbing equipment with small surface areas like spoons, knives and forks, swab the entire surface of one side of the implement.

Hand swabs should be taken of the food handler on clean hands that have just been washed in the presence of the auditor. The auditor should swab the food handler's dominant hand by tracing from the wrist, over the nails and in between the fingers, up to the opposite wrist area. Complete by swabbing the palm of the hand. Swabbing to concentrate on fingers and fingernails, top of thumb and other frequently missed areas.

Neither food samples nor surface and hand swabs should be frozen. The auditor shall follow the Quality Procedure issued by the auditing company and laboratory to ensure the process of safe storage at the correct temperature, number of ice bricks, packing of cooler boxes and types of cooler boxes is adhered to. Further to this the Quality Procedure outlining the details of transportation of the samples while within the auditor's and/or courier company's care must be strictly adhered to. Details include instructions for the safe arrival of samples at the lab and control points/checks that are in place to ensure that the process is transparent, authentic and trustworthy.



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### **Self-Audits**

Self-audits can be created on the online platform as a tool to do a self-evaluation or to conduct internal audits. The self-audits are available per store format and upon completion a score will be generated. The scoring is calculated using the same method as the external audit scoring, which would give a good indication of the actual results achievable by the store in their upcoming formal audit.

It is recommended that the store conducts a self-audit at least once a quarter. It would be up to the retailer to decide whether to conduct a self-audit before the formal audit in preparation for the formal audit or after the formal audit. The benefit of conducting a self-audit in advance would be that the retailer could get an accurate reading on what to expect in the formal audit and/or allows for the opportunity to remedy bad behaviour or practices that may have slipped into the department/store.

A self-audit could also be conducted after the formal audit. The benefit of doing a post-formal audit self-audit would be to see if the corrective actions have been implemented and whether the problem has been resolved. This should enable the food safety team to identify critical control points still to be actioned or needing further remedy prior to the next audit.

Involve the staff in each department so that they can understand the requirements. It is a good idea to have a dedicated Food Safety Store Ambassador controlling the hygiene and safety in each store. This person should monitor food chemical usage, the cleanliness of staff facilities, the adherence to cleaning schedules, internal audits, as well as join the auditor during the store audit.

### **Appeals and Feedback (Complaints, Suggestions and Compliments)**

#### **Dispute/Appeals Procedure**

Should a retailer have a dispute or a concern about the outcome of a store audit finding, discuss it with the relevant Regional Operations Management team (ROM) and follow the dispute/appeal process on the online platform provided.

The dispute/appeals process for retail stores must be completed and submitted within 3 working days after the Preliminary Report has been received. Feedback must be provided by the auditing company within 5 working days from receipt of the appeal.

Should any score need to be adjusted and points awarded or deducted this will happen by day 9 allowing the score to be calculated into the Final Report.

#### **Feedback (Complaints/Suggestions/Compliments)**

As we are constantly striving to improve and grow the Food Safety Culture at SPAR, we welcome any compliments on what we are doing well, suggestions on how we could improve our service to the retailers and complaints on what is not working for the retailers.

This would include concerns around the audit experience, the conduct of the auditor or the store quality management programme in general.