

Training Material for Management: Driving Cultural Change

This training material is designed for the management team to introduce the new, BRC-compliant approach to our Product Safety Culture.

Module 1: Why We Are Changing

The Challenge with Our Old Approach

Our previous "Food Safety and Quality Culture Plan" was a great starting point, but it had key limitations. It was largely a conceptual document that described our intentions rather than providing an auditable action plan. Critically, its **measurement system relied on a subjective 0,1,2,3 scale** that only measured whether an activity was completed, not its **actual impact on employee behavior or product safety**. This approach presented a significant risk during audits because it could not provide objective proof of a positive cultural shift.

Conceptual Document

Described intentions rather than providing an auditable action plan

Subjective Measurement

Used a 0,1,2,3 scale that only measured activity completion

Audit Risk

Could not provide objective proof of a positive cultural shift



The New BRC Requirement

The BRC Packaging Standard update is highly prescriptive. It demands that senior management defines a clear, effective plan for a product safety culture that includes:

- 1

Defined Activities

Specifically designed around **communication, training, feedback, required behaviors, and performance measurement.**
- 2

An Action Plan

Indicating *how* activities will be undertaken, *when* they will be completed, and *how* their effectiveness will be measured.
- 3

A Review Process

A formal, documented review of the plan's effectiveness at least annually.

Our updated procedure is a shift from a descriptive document to an **auditable management system that meets these requirements.**

Module 2: The New Approach

The new approach is built on a foundation of proactive, data-driven management and is centered on five core pillars mandated by the BRC Standard.

Communication
Two-way dialogue between
management and employees

Measurement
Objective KPIs to track cultural
maturity



Training

Ensuring competence, not just
knowledge

Feedback

Formal mechanisms for employee
input

Behaviors

Defined actions that improve product
safety

The Five Core Pillars in Detail

Communication

We will move from one-way messaging to a two-way dialogue. By using formal channels (e.g. whatsapp, confidential reporting, annual survey) for employee feedback to ensure our message is understood and acted upon.

Training

Training must go beyond simply providing knowledge; it must ensure competence. Maintain formal training with assessments to verify that employees can apply what they have learned. This ensures that training has a lasting impact on behavior.

Feedback

A formal feedback mechanism has been implemented, such as a confidential portal. This demonstrates that we are actively soliciting employee input and that their concerns are not only received but acted upon.

Behaviors (Main Change)

The behaviors have been defined required to maintain and improve product safety, such as proactive reporting and consistent practice. As managers, your role is to lead by example and demonstrate a personal commitment to these behaviors.

Measurement

The subjective scoring system has been replaced with a dashboard of objective, quantitative Key Performance Indicators (KPIs). We will measure both **proactive indicators** (e.g., near-miss reporting rates, employee feedback participation) and **reactive indicators** (e.g., customer complaints, non-conformities). This provides a clear, data-driven picture of our cultural maturity.



Proactive Indicators

- Near-miss reporting rates
- Employee feedback participation
- Training completion and competency



Reactive Indicators

- Customer complaints
- Non-conformities
- Audit findings

Communication

Communication	Share product safety information regularly through established channels (e.g. WhatsApp group, noticeboards, briefings) so all employees receive and understand key messages.	Operations Manager	10 times/Annum	1 = Messages irregular or little engagement 2 = Regular messages, partial engagement 3 = Regular messages, high engagement and interaction
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Training

Training	Provide annual food safety training for all staff, ensure new employees are trained at induction, and confirm competence through refresher sessions or practical checks.	Operations Manager/Director	Annual	1 = Planned / Minimal / Little or no verification of competency. 2 = Implemented / Partial/ Competency checks done but not consistent across all staff. 3 = Effective / Embedded/ Competency checks confirm staff can apply knowledge.
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Feedback

Feedback	Collect employee feedback on product safety through surveys or direct reporting, and ensure responses are reviewed, acted upon, and communicated back to staff.	Operations Manager/Director	Annual	1 = Average section scores are below 2.0 (out of 3 or 5 depending on survey design).Responses show inconsistent leadership commitment, weak communication, or lack of empowerment.Culture is still mostly compliance-driven (people do the minimum, often only when observed).2 = Average section scores are between 2.0 and 3.5 . Employees generally understand their role, training is mostly effective, and some proactive behaviours are visible. Feedback mechanisms exist, but impact is uneven (e.g. some actions from feedback, but not consistently).3 = Average section scores are above 3.5 . Leadership visibly prioritizes safety, communication is open, and employees feel empowered.Proactive reporting, accountability, and continuous learning are normalised behaviours
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Behaviours

Behaviours	Define and communicate expected food safety behaviours, with managers reinforcing them through daily leadership so staff apply them consistently without supervision.	Operations Manager/Director	Annual & Ongoing	<p>1 = Behaviours defined but not widely visible or reinforced. Staff mostly comply when supervised; lapses when not observed.</p> <p>2 = Behaviours are communicated and partially adopted across teams. Most staff follow safety practices, but not always without prompting. Supervisors occasionally reinforce behaviours, but not systematically.</p> <p>3 = Behaviours are widely demonstrated without supervision. Strong culture of proactive reporting, accountability, and empowerment. Staff consistently adhere to protocols and encourage peers.</p>
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Performance Measurement

Performance Measurement	The site will track and review KPIs on product safety, legality, and quality (e.g. complaints, audit findings, incidents, compliance checks) at set intervals to monitor culture and drive improvement.	Senior Leadership	Annual	<p>1 = Key metrics (complaints, audit NCs, incidents, legal compliance) are not consistently tracked or reviewed. Little or no evidence that performance data drives improvement.</p> <p>2 = Metrics are tracked regularly (monthly/quarterly) and reported to management. Evidence of progress in some areas (e.g. fewer NCs), but not across all.</p> <p>3 = Metrics on safety, legality, and quality are systematically tracked and reviewed. Results show continuous improvement trends (e.g. fewer complaints, stronger audit outcomes, full compliance).</p>
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Module 3: Leadership Role

As a manager, you are the cornerstone of this culture approach. Your **visible commitment is the most important factor** in shaping employee behavior.

Lead by Example

Consistently follow all protocols, such as proper handwashing and wearing the correct attire. **Employees are more likely to adopt safe practices if they see management doing the same.**

Empowerment

Foster a trusting and open environment where **employees feel empowered to raise concerns or report issues without fear of reprisal.** Empower them to take ownership and lead positive change.

Reinforce Behaviors

Use consistent, clear, and fair reinforcement to shape behaviours.

Acknowledge and reward positive actions and provide constructive feedback for areas of improvement.

Utilize Data

Use the new KPIs to identify trends, address gaps, and inform strategic decisions. **Regularly review the data from the Action Plan and discuss it with your teams.**

By embracing this data-driven approach, we will not only achieve BRC compliance but also create a genuinely resilient and high-performing product safety culture.