



Government of **Western Australia**
Department of **Health**

WA Food Regulation: Food Safety Auditing – Guideline for Regulatory Food Safety Auditors (on the Approval Process)

Version 2

Date 15 June 2021

Approved by Managing Scientist – Food

The Department of Health (WA) has made every effort to ensure that information in this publication is accurate and up to date at the time that it was prepared. The Department of Health gives no warranty that the information contained in the Guideline is free from error or omission or is current at the time that you access it. Information in this Guideline is general in nature and is provided only as a guide to appropriate practice. It is not intended to be relied on as legal advice. Legal advice relevant to the user's circumstances must be obtained where required. It is the responsibility of users to inform themselves of any updates to the Guideline and the relevant legislation applying, and to ensure that they rely on information which is current as the information may change without notice. The Minister for Health, the State of Western Australia, their employees and agents expressly disclaim liability for any loss, costs or damage suffered or incurred by users relying on this Guideline.

Contents

1.	Introduction	1
2.	Scope	1
3.	<i>'WA Food Regulation: WA Health Regulatory Food Safety Auditor Approval Process Policy'</i> superseded	1
4.	Objectives	1
5.	Related documents	1
6.	Definitions	2
7.	Responsibilities	5
8.	The food safety auditor approval process	5
9.	Criteria for approval	6
10.	Condition of approval	9
11.	Post approval process	10
12.	Review of decisions relating to approvals	11
	Appendix 1 - Approved application form (for approval/renewal/additional competencies as an RFSA)	12
	Appendix 2 - Further guidance on skills and knowledge – selection criteria (section 4 of application form)	20
	Appendix 3 - Regulatory food safety auditor competencies and endorsements	22

Guideline for Regulatory Food Safety Auditors (on the Approval Process)

1. Introduction

This Guideline applies to the regulatory food safety audit system and to the regulatory food safety auditors (RFSAs) who audit food businesses under that system. This Guideline provides a framework for RFSAs to utilise in order to provide clarity and consistency on the process of becoming an RFSA and the actions required once approved as an RFSA under the *Food Act 2008* (WA) (the Food Act). Additionally, it provides guidance on the renewal process.

In addition to this Guideline there is a Code of Conduct that applies to all RFSAs approved by the Chief Executive Officer (CEO) of the Department of Health (DOH) to conduct regulatory food safety audits of food businesses. Such persons are expected to conduct themselves with integrity, professionalism, and be accountable for the outcomes of audits they perform. The Code of Conduct provides a basis against which the DOH may review, impose conditions, or revoke or suspend an RFSA's approval.

Part 8 of the Food Act sets out requirements relating to regulatory food safety audits. It includes provisions for the CEO to authorise a staff member or approve an individual to be an RFSA where the CEO is satisfied that person is competent to do so, and it sets out auditing and reporting requirements. The CEO's powers under Part 8 may be delegated, in writing, to a member of staff. The CEO, acting through the DOH, is an enforcement agency as set out in the Food Regulations 2009 (Food Regulations).

2. Scope

This Guideline is applicable to Western Australia (WA) only. It is based on the National Food Safety Audit Policy, National Regulatory Food Safety Auditor Guideline and the Food Act. This Guideline deals with the approval (which includes the renewal of approval), and the addition of specialised high-risk activities of RFSAs, for the purposes of the Food Act and does not apply to the certification/approval of auditors for any other scheme or purpose.

3. 'WA Food Regulation: WA Health Regulatory Food Safety Auditor Approval Process Policy' superseded

This Guideline supersedes the policy WA Food Regulation: WA Health Regulatory Food Safety Auditor Approval Process Policy (dated 18 March 2011).

4. Objectives

The objectives of this Guideline are to provide:

- guidance on the process of becoming an approved RFSA and
- in-depth guidance on the process used by the DOH to assess applications for RFSA approval in WA.

5. Related documents

In addition to this Guideline there is another Guideline for RFSAs that details the processes for conducting regulatory food safety audits and audit reporting to the food business and appropriate enforcement agency, which is detailed in the WA Food Regulation: Food Safety Auditing - Guideline for RFSAs – on the Reporting Requirements. The Guideline regarding reporting requirements also outlines the processes for verifying the audit management system used by the DOH, so as to comply with the National Food Safety Audit Policy. In addition, the

following documents relate to the Regulatory Food Safety Auditing system, and are available on the [Department of Health website](#):

- [National Regulatory Food Safety Auditor Guideline \(PDF 412 KB external site\)](#)
- [National Food Safety Audit Policy \(PDF 224 KB external site\)](#)
- [WA Food Regulation: Guideline for the Management of the Regulatory Food Safety Auditing System \(PDF 336 KB\)](#)
- [WA Food Regulation: Food Safety Auditing – Guidelines for Regulatory Food Safety Auditors \(on the Audit and Reporting Requirements\) \(PDF 526 KB\)](#)
- [WA Food Regulation: Food Safety Auditing – Guidelines for Enforcement Agencies \(PDF 383 KB\)](#)
- [WA Food Regulation: Food Safety Auditing – Information for Food Businesses \(PDF 273 KB\)](#)
- [WA Food Regulation: Food Safety Auditing - Code of Conduct \(PDF 288 KB\)](#)

6. Definitions

Term	Definition
Approval	A decision by the CEO or their delegate that they are satisfied an individual is competent to carry out the functions of an RFSA and that the individual may (with or without conditions) exercise powers as an RFSA.
Audit	A systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.
Audit Report	The report required under section 102 of the Food Act by which RFSA's report audit outcomes to enforcement agencies. The section 102 form for audit reports (approved by the CEO) is contained in WA Food Regulation: Food Safety Auditing Guidelines for Regulatory Food Safety Auditors (on the Reporting Requirements)
CEO	The Chief Executive Officer of the department of the Public Service principally assisting in the administration of the Food Act (section 8). The CEO of the Department of Health is the "Director General".
Compliance	Refers to a state when persons, food businesses or primary producers are operating within the regulatory requirements that apply to that person, food and associated inputs, food business or primary producer.
Critical non-compliance	Contraventions of the Food Act, regulations relating to food safety programs or the Food Safety Standards detected during regulatory food safety audits that present an imminent and serious risk to the safety of food intended for sale or that will cause significant unsuitability of food intended for sale (section 102(5) Food Act).
DOH	Department of Health (WA)

Term	Definition
Enforcement agencies	<p>As defined in section 8 of the Food Act, an enforcement agency is</p> <ul style="list-style-type: none"> (a) the CEO; or (b) a local government; or (c) a person or body, or a person or body within a class of persons or bodies, prescribed by the regulations for the purposes of this definition; <p>As prescribed in the Regulations, depending on the circumstances, an enforcement agency will be either the CEO or a local government.</p>
Food Act	<p>Food Act 2008 (WA) (external site)</p>
Food Business	<p>As defined in section 10 of the Food Act a “food business” is “a business, enterprise or activity (other than a business, enterprise or activity that is primary food production) that involves —</p> <ul style="list-style-type: none"> (a) the handling of food intended for sale; or (b) the sale of food, <p>regardless of whether, subject to section 6, the business, enterprise or activity concerned is of a commercial, charitable or community nature or whether it involves the handling or sale of food on one occasion only”.</p> <p>Note that dairy primary producers are also a ‘food business’ in accordance with Regulation 6 of the Food Regulations which prescribes that any food production activity to which a standard in Chapter 4 of the Australia New Zealand Food Standards Code (Food Standards Code) applies is not primary food production for the purpose of section 10.</p>
Food Regulations	<p>Food Regulations 2009 (WA) (external site)</p>
Food Safety Program (FSP)	<p>As defined at section 103(1) Food Safety Program means, “for a food business, the food safety program required by the regulations to be prepared for the food business”.</p> <p>Standard 3.2.1 states a food safety program must -</p> <ul style="list-style-type: none"> a) systematically identify the potential hazards that may be reasonably expected to occur in all food handling operations of the food business; b) identify where, in a food handling operation, each hazard identified under paragraph (a) can be controlled and the means of control; c) provide for the systematic monitoring of those controls; d) provide for appropriate corrective action when that hazard, or each of those hazards, is found not to be under control; e) provide for the regular review of the program by the food business to ensure its adequacy; and f) provide for appropriate records to be made and kept by the food business demonstrating action taken in relation to, or in compliance with, the food safety program.

Term	Definition
Food Safety Standards	Defined at section 8 of the Food Act to mean: the Standards contained in Chapter 3 of the Food Standards Code.
Food Standards Code	<p>Australia New Zealand Food Standards Code (external site) Under section 8 of the Food Act means the Australia New Zealand Food Standards Code as defined in the Commonwealth <i>Food Standards Australia New Zealand Act 1991</i> and as adopted or incorporated by the regulations.</p> <p>The Food Standard Code has been adopted under Regulation 7 of the Food Regulations. The Code sets out in Chapters, the Standards that apply to food.</p>
List of Approved Regulatory Food Safety Auditors in WA	The list of regulatory food safety auditors, as required by section 105 of the Food Act, to be prepared and maintained by the CEO. The publicly available list of RFSAs in WA is located on the Department of Health website
National Food Safety Audit Policy	The policy endorsed by the Australian and New Zealand Food Regulation Ministerial Council on 25 October 2006 for the approval and management of RFSAs and regulatory food safety audits in Australia. This policy is available on the Food Regulation website (external site)
Non-compliance	A non-compliance against the FSP, the Food Safety Standards (or if applicable Standard 4.2.4) or the Food Act that is not considered to pose an imminent and serious risk to food intended for sale or that will cause significant unsuitability of food intended for sale. Compare to “critical non-compliance”.
Priority Classification	The Priority Classification of a food business as determined by an enforcement agency in accordance with the WA Priority Classification System approved by the CEO under section 100 of the Food Act.
Regulatory food safety audit	<p>An audit (by an RFSAs) arranged by a food business proprietor to satisfy the requirements imposed by section 99(2) of the Food Act.</p> <p>Regulatory food safety audit means an evaluation, by an RFSAs, of a food business’ verified food safety program or other aspect of a food business to determine compliance with relevant aspects of the Food Act, the Food Regulations and associated policies applicable in WA.</p>
Regulatory Food Safety Auditor (RFSAs)	<p>A food safety auditor approved or authorised by the CEO in accordance with Part 8 Division 1 of the Food Act.</p> <p>RFSAs means a person formally approved or authorised by the CEO to conduct audits of food businesses or other premises requiring food safety audits (e.g. any business required by the Food Standards Code to implement a food safety program that complies with Standard 3.2.1 i.e. hospitals, child care centres etc.).</p>

Term	Definition
Regulatory Food Safety Auditor – Code of Conduct	Sets out standards of conduct that all RFSAs are required to demonstrate in their practice as RFSAs, and all RFSAs are required to commit to abide by the Code of Conduct as a condition of their approval. The Code of Conduct imposes an obligation on RFSAs to notify the CEO of any direct or indirect interest in any food business (section 96 of the Food Act). The RFSA Code of Conduct can be found on the Department of Health website .
Standard 3.2.1	Standard 3.2.1 (Food Safety Programs) of the Food Standards Code (external site)
Standard 4.2.4	Standard 4.2.4 (Primary Production and Processing Standard for Dairy Products) of the Food Standards Code (external site)

7. Responsibilities

The CEO is responsible for approving RFSAs (through a process of assessment, refer to criteria for approval section 9) and may authorise a person who is a member of staff (section 94 of the Food Act). The responsibility for activity in the regulatory food safety audit process is shared between enforcement agencies (DOH or local government), RFSAs and food businesses that are subject to regulatory food safety auditing.

The duties of RFSAs are contained within section 101 of the Food Act and are summarised below:

- conduct audits (within their scope of approval) of FSPs required by the regulations,
- conduct any necessary follow-up action, including further audits, as necessary, to determine if action has been taken to remedy any deficiencies in an FSP as identified during an audit,
- conduct assessments of food businesses to ascertain their compliance with the requirements of the Food Safety Standards (Chapter 3 of the Code),
- submit audit reports prepared in accordance with section 102 to the enforcement agency, with a copy provided to the proprietor of the food business.

The role of the RFSA is to conduct regulatory audits of a food business's FSP to determine whether their program continues to comply with the applicable legislation. RFSAs may not conduct audits outside their scope of approval. The food business is responsible for engaging the services of an RFSA.

The Food Act places a number of obligations and duties on RFSAs. It also provides for the suspension and cancellation of a person's approval as an RFSA if these obligations and duties are not competently undertaken.

8. The food safety auditor approval process

Persons seeking to become an RFSA for the first time or those seeking renewal or addition of extra competencies may make an application using the Application Form (for Approval/Renewal/ adding an additional competency as an RFSA) available on the [DOH website](#). The application form is in Appendix 1. A completed Application Form must be accompanied by an application fee, which is non-refundable, as well as any information required by the CEO (section 94(3) of the Food Act). The application will not be assessed until the fee has been received.

For first time applicants, all sections except for section 10 of the Application Form require completion. For applications for renewal or addition of specialised high-risk activities only the relevant sections indicated on the form require completing.

9. Criteria for approval

All new RFSA applicants will be assessed by the CEO against the following competency criteria (section 94(1)(b) of the Food Act) adapted from the National Regulatory Food Safety Auditor Framework approved by the Food Regulation Standing Committee. RFSA competencies and endorsements are detailed in Appendix 3.

Criteria for approval											
<p>1. Certification (attainment) against the audit knowledge competencies</p>	<p>All RFSAs must submit evidence of attainment of the required national units of competency:</p> <table border="1" data-bbox="715 651 1426 1133"> <thead> <tr> <th>Unit of competency code</th> <th>Unit title</th> </tr> </thead> <tbody> <tr> <td>FDFFSACA* or FDFFAU4001*/FBPAUD4001 (RABQSA-NFS1)</td> <td>Assess compliance with food safety programs</td> </tr> <tr> <td>FDFFSCOMA or FDFFAU4002A/FBPAUD4002 (RABQSA-NFS2)</td> <td>Communicate and negotiate to conduct food safety audits</td> </tr> <tr> <td>FDFFSFCSAA or FDFFAU4003A/FBPAUD4003 (RABQSA-NFS3)</td> <td>Conduct food safety audits</td> </tr> <tr> <td>FDFFSCHZA or FDFFAU4004A/FBPAUD4004 (RABQSA-NFS4)</td> <td>Identify, evaluate and control food safety hazards</td> </tr> </tbody> </table> <p>*This competency may be superseded by a person who has already obtained competency FDFFSFCSAA/FDFFAU4003A/FBPAUD4003</p> <p>Bodies that may conduct training and assessment are Personnel Certification Bodies e.g. Exemplar Global (previously RABQSA) and/or Registered Training Organisations.</p>	Unit of competency code	Unit title	FDFFSACA* or FDFFAU4001*/FBPAUD4001 (RABQSA-NFS1)	Assess compliance with food safety programs	FDFFSCOMA or FDFFAU4002A/FBPAUD4002 (RABQSA-NFS2)	Communicate and negotiate to conduct food safety audits	FDFFSFCSAA or FDFFAU4003A/FBPAUD4003 (RABQSA-NFS3)	Conduct food safety audits	FDFFSCHZA or FDFFAU4004A/FBPAUD4004 (RABQSA-NFS4)	Identify, evaluate and control food safety hazards
Unit of competency code	Unit title										
FDFFSACA* or FDFFAU4001*/FBPAUD4001 (RABQSA-NFS1)	Assess compliance with food safety programs										
FDFFSCOMA or FDFFAU4002A/FBPAUD4002 (RABQSA-NFS2)	Communicate and negotiate to conduct food safety audits										
FDFFSFCSAA or FDFFAU4003A/FBPAUD4003 (RABQSA-NFS3)	Conduct food safety audits										
FDFFSCHZA or FDFFAU4004A/FBPAUD4004 (RABQSA-NFS4)	Identify, evaluate and control food safety hazards										
<p>2. Possession of appropriate educational and technical qualifications for auditing of medium and high-risk levels</p>	<p>Certificate IV or higher in Food Science and Technology (FDF40311/FBP40418) or Certificate IV or higher in a related field (that includes 40 hrs food microbiology). Or a qualification acceptable for approval as an Environmental Health Officer. Anyone (e.g. Environmental Health Officers, authorised officer, quality assurance manager) who can demonstrate that they have relevant qualifications and sufficient recent practical experience in food safety assessment within the industry sector applicable, may be deemed competent by the CEO.</p>										
<p>3. Possession of appropriate competencies for auditing of high-risk activities and complex processes</p>	<p>Persons seeking to conduct regulatory food safety audits of specialised activities/processes e.g. cook chill will be required to possess the relevant 'specialised auditing competencies' and be</p>										

Criteria for approval

assessed as competent to undertake auditing of these activities.

Specialised process	Unit of Competency Code	Unit Title
Cook Chill	FDFFSCC4A/FDFAU4006A/ FBPAUD5002	Audit a cook chill process
Heat treatment processes	FDFFSHT4A/FDFAU4007A/ FDFAU4007B/ FBPAUD5003	Audit a heat treatment process
Ready to eat (RTE) meat products	FDFFSME4A/FDFAU4008A/ FBPAUD5004	Audit manufacturing of RTE meat products
Raw oysters and bivalve production and processing	FDFFSBM4A/FDFAU4005A/ FBPAUD5001	Audit bivalve mollusc growing and harvesting processes

Additional information on training packages, units of competency and registered training organisations (RTO's) able to provide Statements of Attainment in the above listed units of competency can be found on the following website www.training.gov.au

Auditors may apply to an RTO that offers the units of competence above to receive recognition of prior learning (RPL). As the DOH is not an RTO the Department is unable to offer RPL.

4. Commitment to adhere to the Code of Conduct

All RFSA's will be required to sign their commitment to abide with the Code of Conduct. A copy can be found on the DOH website. Compliance with the Code of Conduct is a condition of approval and breach of the Code of Conduct may result in a suspension or cancellation of approval.

5. Pre-approval additional provisions

All persons seeking appointment as an RFSA will be required to sign a declaration that the information is true, correct and complete in relation to the following matters in their application:

- Previous criminal activity;
- Whether approval has been denied, suspended or cancelled in another jurisdiction
- Consent for the DOH to verify the accuracy and integrity of this information from time to time.

Criteria for approval

	<p>RFSAs must ensure they have an adequate level of professional indemnity/public liability insurance cover in place.</p>
<p>6. Appropriate skills and knowledge regarding WA's food regulatory system</p>	<p>Applicants will be assessed on their knowledge and understanding of WA's food legislation in order to verify that the applicant can appropriately interpret and apply legislation before approval is granted. A statement needs to be submitted providing sufficient evidence to demonstrate appropriate skills and knowledge in relation to the following selection criteria to the satisfaction of the DOH:</p> <ul style="list-style-type: none">• An in-depth understanding of the Australia New Zealand Food Standards Code; in particular a recent working knowledge of Chapter 3 (the Food Safety Standards);• An in-depth understanding of how the Food Safety Standards relate to the specific food industry sector that they wish to audit (i.e. food businesses captured by standards 3.3.1 and 4.2.4);• A demonstrated ability to interpret the requirements of the WA food regulatory system, including the <i>Food Act 2008</i> and the regulatory food safety auditing framework;• Knowledge and a demonstrated ability to carry out auditing of food safety programs/quality assurance plans/ food safety management systems (whichever applicable); and• An understanding of the role of the State (DOH) and local government in food regulation. <p>Further guidance on completing the five selection criteria above is contained within Appendix 2.</p>
<p>7. Satisfactory completion of a witness audit</p>	<p>All applicants will need to submit written evidence of a completed witness audit. The scope of the witness audit must correspond with the scope of audit approval sought by the applicant. If the applicant is applying for approval over a number of audit scopes, they may need to submit evidence from a number of witness audits.</p>

Upon receipt of the application form and the supporting documentation, the CEO (or the nominated delegate) will review and assess the application. Should investigation reveal any information provided to be intentionally false or misleading this will result in an application being questioned or rejected outright. If investigation following the approval of a person reveals that substantial false and misleading statements have been made, the auditor's approval may be cancelled or suspended.

All decisions relating to approvals of RFSAs will be made by the CEO (or nominated delegate). The application will either be refused or granted with or without conditions. The CEO endeavours to notify applicants of the outcome in writing within 30 working days. This timeframe will be adjusted where the applicant has not addressed all criteria or has not provided all information required in support of their application. In these cases, the applicant will be advised what further information is required and given 20 working days to provide it. If no response is received within this period, a follow up email will be sent allowing a further 20 working days. If no response is received within the second time frame, the application will be refused.

The duration of an RFSAs approval by the CEO is for 4 years, unless cancelled or suspended. Once an auditor approval has been granted, a certificate of authority card will be issued, and a letter sent detailing the conditions of approval. In addition, the RFSAs will be listed on the DOH's website 'List of approved RFSAs'. The RFSAs may commence audits in their endorsed industry sectors. The certificate of authority card remains the property of the DOH. If an auditor's approval is cancelled, the card is to be returned immediately to the DOH. In accordance with section 95 of the Food Act the term of the approval remains in force for the period specified in the approval unless sooner cancelled (except during any period of suspension). RFSAs must keep their contact details up to date and apply for renewal prior to the expiration date.

The renewal process requires that RFSAs demonstrate that they continue to be competent and remain up to date. RFSAs must be able to demonstrate that they are maintaining their standards of practice as auditors before being renewed by:

- Demonstrating recent auditing skills. This must be demonstrated by producing five audit reports that have been submitted to the relevant enforcement agency in the previous twelve months and a witness audit report. An applicant may also produce documentation from a certification body or professional body (accepted by DOH) to verify ongoing professional development.
- Remaining up to date with the Food Act and Food Standards Code and with the management system for RFSAs (i.e. aware of any changes and able to implement them effectively). If an RFSAs has not undertaken audit functions in the previous twelve months, then information would be required on how the RFSAs has maintained their standard of practice as an auditor with specific reference to maintaining knowledge of the Food Act and audit management system and maintaining auditing skills.

Mutual recognition

To invoke the mutual recognition principle, an applicant must apply for approval and give details to the DOH (second jurisdiction) of his or her approval in the first jurisdiction. This application must also provide the DOH (second jurisdiction) with the consent to access such information and particulars as is required to process the application. The DOH has 30 days to assess the application; however, this decision may take up to six months. The Mutual Recognition Act 1992 has been adopted in WA under the Mutual Recognition (Western Australia) Act 2010.

10. Condition of approval

Under section 94(5) of the Food Act the CEO must set out any conditions to which the approval is subject. The CEO has determined that the approval of RFSAs is subject to the following conditions:

- RFSAs to provide written evidence that they have conducted a witness audit*/skilled examination via an appropriately registered skilled examiner from an organisation such as Exemplar Global. If newly approved, the RFSAs is to provide the DOH within six months of receiving their approval, written evidence that the RFSAs has completed an audit that has been witnessed by an external third party (i.e. skilled examiner), deeming

the RFSA as competent. For renewals the witness audit/skilled examination must be within the last two years upon application for renewal.

- Compliance with the WA Regulatory Food Safety Auditor Code of Conduct;
- Attendance at any training required by the DOH over the term of approval;
- Submission of audit records to DOH when required;
- RFSA shall not subcontract the performance of any regulatory food safety audit services. RFSA shall not assign any of their rights or obligations under this approval in whole or in part; unless working as a team as previously specified with another approved RFSA
- RFSA to hold and keep current for the duration of approval a professional indemnity/public liability insurance policy that will provide adequate coverage for any loss that may be suffered if harm is caused to another and the auditor is liable; which is to be submitted to the DOH upon request
- RFSA to provide a copy of the first five completed audit reports (including those per scope of approval/specialised high-risk activity) performed for assessment by the DOH within six months. These reports will be assessed to confirm competency and compliance against the performance standards documented below:
 - Audit duration – assess whether appropriate
 - Relevance of corrective action request issued
 - Severity of corrective action request issued
 - Completes audit reports in compliance with agreed reporting templates
 - Completes audit reports within appropriate timeframes
 - Draws appropriate conclusions from the evidence gathered and reviewed during the on-site component of the audit with respect to the food business's compliance with its approved system
 - Appropriately identifies and classifies non-compliances and/or non-conformances within the food business's approved system during the regulatory audit. Part of this assessment will include a review of the evidence obtained by the auditor to verify that the business has implemented the agreed corrective measure(s).
 - Notification of critical food safety issues
 - Notification of audit failure

**The witness audit/skilled examination will assess the applicant's skills and knowledge and understanding of the Act and will verify that the prospective approved auditor has the necessary auditing skills and appropriately interprets and applies the applicable legislation.*

The witness audit must be conducted to the highest specialised activity. If the auditor is deemed not yet competent they may retake the witness audit/skilled examination.

Note: If the applicant does not comply with the condition attached to their approval and provide, within 6 months of the grant of the new approval, evidence of a completed witness audit that, in the opinion of the CEO, demonstrates the applicant is competent to undertake regulatory food safety audits, the CEO may refuse/cancel the applicant's approval.

11. Post approval process

Once approved by the CEO the RFSA is issued with a letter detailing the conditions of the approval and a certificate of authority card that contains the following details (as detailed in section 104(2) of the Food Act):

- a. approval issued under the Food Act;
- b. name, photograph or digital image and signature of the person who has been issued the approval;
- c. date of expiry of the approval;
- d. any conditions to which the person's approval as an RFSA is subject; and
- e. the signature of the CEO.

Once the RFSA is in receipt of their certificate of authority card and have been included on the list of food safety auditors (maintained by DOH as required by section 105 of the Food Act) they may commence audits within their scope of approval. The RFSA must carry their certificate of authority card when carrying out regulatory food safety audits.

A food safety auditor may request that their approval is cancelled (under section 97(2)(e) of the Food Act), for example should they decide not to continue working in WA. This cancellation will not be communicated to other State and Federal jurisdictions. It is the responsibility of the individual auditor to ensure that they do not market their services in WA once they have surrendered their approval.

Should the CEO deem it necessary to cancel an auditor's approval, the DOH will where applicable notify other state and federal jurisdictions under the Mutual Recognition Act 1992 of that auditor's cancellation. Identity cards must be returned to the DOH immediately upon cancellation of approval if they haven't expired.

The scope of activity of the RFSA will be restricted to the legislation that the RFSA has been assessed against. Approved RFSAs may not conduct regulatory audits in areas outside their scope of approval. Approved RFSAs wishing to change or upgrade their scope of approval must re-apply to the DOH and will be subject to additional assessment if higher competencies have been attained.

12. Review of decisions relating to approvals

If an applicant for approval or holder of approval is dissatisfied with the CEO's decision in relation to:

- a. the grant or refusal of the application for the approval;
- b. the imposition of conditions on the approval;
- c. the variation of conditions of the approval;
- d. the suspension or cancellation of the approval

the applicant or holder may apply to either the CEO or the State Administrative Tribunal (SAT) for a review of that decision (section 98 of the Food Act).

An application for review of a decision must be made within 28 days of the applicant being served with the written approval or notice of refusal in the case of (a) or (b); or the relevant notice of the variation, suspension or cancellation in the case of (c) or (d).

For further information on the duties of regulatory food safety auditors and auditor reporting requirements/responsibilities please refer to the Guideline for RFSAs (on the Reporting Requirements).

Appendix 1 - Approved application form (for approval/renewal/additional competencies as an RFSA)



Government of **Western Australia**
Department of **Health**

Food Act 2008 Part 8 Division 1

Application for Approval/ Renewal/ Adding an Additional Competency as a Regulatory Food Safety Auditor

APPLICATION TYPE

APPROVAL (new application)

For approval complete all sections of the form (except section 10)

APPROVAL (RENEWAL) and/or adding an ADDITIONAL COMPETENCY

For renewal and/or adding an additional competency complete all sections except 4, 5 and 6

SECTION 1: CONTACT DETAILS

Details marked with an asterisk (*) will be made publicly available on the Department of Health's approved regulatory food safety auditors list

Full Name*: _____

Business name (optional)*: _____

Postal Address: _____

Suburb: _____

Phone Number*: _____

Mobile Number*: _____ Facsimile Number*: _____

E-mail Address*: _____

Web Address*: _____

SECTION 2: EMPLOYMENT DETAILS

Employment Arrangements:

Self-employed Subcontracting Audit Company Employee

Local Government Dept. of Agriculture, Water and the Environment

Business Name: _____

Trading Name (if applicable): _____

ABN ACN

Postal Address: _____

Phone Number: _____ Facsimile Number: _____

SECTION 3: MUTUAL RECOGNITION

Yes No

Do you hold an active approval as a regulatory food safety auditor in any other jurisdiction?

If yes, please tick relevant jurisdiction below and note that you are still required to address Skills and Knowledge – Selection Criteria in Section 4 below:

VIC QLD SA TAS

NSW NT ACT

Department of Agriculture, Water and the Environment

*If an approved third-party auditor currently with the Department of Agriculture, Water and the Environment you are not required to complete section 4.

Please provide a certified copy of your certificate of approval and sign the following declaration:

I consent to the CEO, Department of Health, to access such information and particulars as necessary from the above-mentioned jurisdiction/s in order to process my application for approval as a food safety auditor in Western Australia.

Signature: _____ Date: _____

SECTION 4: SKILLS AND KNOWLEDGE – SELECTION CRITERIA

Please attach a written statement addressing each of the following selection criteria:

You are required to provide 1-2 pages per selection criteria using the STAR concept (for further information regarding the STAR concept refer to Appendix 2).

- An in-depth understanding of the Australia New Zealand Food Standards Code; in particular a recent working knowledge of Chapter 3 (the Food Safety Standards);
- An in-depth understanding of how the Food Safety Standards relate to the specific food industry sector the applicant is applying to audit;
- A demonstrated ability to interpret the requirements of the Western Australian Food Regulatory System, including the *Food Act 2008* and the Regulatory Food Safety Auditing Framework;
- Knowledge and a demonstrated ability to carry out auditing of food safety programs/quality assurance plans/food safety management systems (whichever applicable); and
- An understanding of the role of state (Department of Health) and local government in food regulation.

SECTION 5: BACKGROUND QUALIFICATIONS/RELEVANT EXPERIENCE

Please attach all relevant evidence of your qualifications for Pathway A or Pathway B and other relevant qualifications e.g. HACCP/auditing (certified copies)

Name of institution.....

Qualification obtained

Year granted

Please complete either Pathway A or B

Pathway A

Do you hold qualifications acceptable for approval as an Environmental Health Officer as detailed in the Guidelines on the Designation of Authorised Officers under section 18 Public Health Act 2016 (listed in the Environmental Health Officers (Approved Qualifications and Experience for Appointment) Notice 2017) and have recent practical experience in food safety assessment within the industry sector applicable?

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

Pathway B

Do you possess a Certificate IV or higher in Food Science and Technology including 40 hours of Food Microbiology? Please attach certified copies of academic transcript.

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

OR

Do you possess a Certificate IV or higher in a related field including a minimum of 40 hours of Food Microbiology? Please attach certified copies of academic transcript and relevant certification confirming equivalency of above qualification by RTO.

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

SECTION 6: AUDIT KNOWLEDGE COMPETENCIES

Please attach certified copies of attainment of competency

Registered Training Organisation: _____

Tick competencies acquired:

- FDFSACA or
FDFAU4001/FBPAUD4001
(RABQSA-NFS1)** Assess compliance with food safety programs

- FDFSCOMA or
FDFAU4002A/FBPAUD4002
(RABQSA-NFS2)** Communicate and negotiate to conduct food safety audits

- FDFSFCFSAA or
FDFAU4003A/FBPAUD4003
(RABQSA-NFS3)** Conduct food safety audits

- FDFSCHZA or
FDFAU4004A/FBPAUD4004
(RABQSA-NFS4)** Identify, evaluate and control food safety hazards

Note: if you have completed alternative units you believe cover the same content as the above 4 units, you will need to provide a statement from the issuing registered training organisation detailing the equivalent knowledge acquired.

SECTION 7: APPLYING FOR APPROVAL OF SPECIALISED HIGH RISK ACTIVITIES (Details marked with an asterisk (*) will be made publicly available on the Department of Health’s approved regulatory food safety auditors list)

Do you already have approval for specialised high-risk activities? If yes, please specify.

Or

	Yes	No
Do you wish to apply for approval of specialised high risk activities?	<input type="checkbox"/>	<input type="checkbox"/>

If yes, please select the high-risk activity you are applying for:

Cook-Chill processes*

Necessary if the auditor wishes to audit food businesses involved in the production and processing of food products that are minimally heat processed and distributed as chilled products with a defined shelf life (undertake a “cook-chill” process).

Applicants must ensure that a certified copy of successful completion of **FDFSACC4A or FDFAU4006A/FBPAUD5002: Audit a Cook-Chill Process** is submitted with this application. A witness audit will need to be arranged to provide evidence that the regulatory food safety auditor is competent to audit this specialised activity.



Heat Treatment processes*

Necessary if the auditor wishes to audit food businesses involved in heat treatment processes that are designed to bring about defined logarithmic reductions in target organisms in food products (undertake a “heat treatment” process).

Applicants must ensure that a certified copy of successful completion of **FDFSHT4A or FDFAU4007A or FDFAU4007B /FBPAUD5003: Audit a Heat Treatment Process** is submitted with this application. A witness audit will need to be arranged to provide evidence that the regulatory food safety auditor is competent to audit this specialised activity.

SECTION 8: PERSONAL HISTORY INFORMATION

In the last 4 years:

	Yes	No
Have you been convicted of any criminal offence in Australia? <i>If yes, please attach details of offence</i>	<input type="checkbox"/>	<input type="checkbox"/>
Have you ever been investigated for offences under the <i>Food Act 2008</i> or its equivalent in other jurisdictions? <i>If yes, please provide the outcome of such investigations.</i>	<input type="checkbox"/>	<input type="checkbox"/>
Have you been denied approval to undertake the role of a food safety auditor or had any approval, auditing accreditation or registration suspended or cancelled by any licensing authority in Australia? If yes, please attach detailed explanation.	<input type="checkbox"/>	<input type="checkbox"/>
I consent to the CEO, Department of Health, to access such information and particulars as necessary from the above-mentioned jurisdiction/s in order to process my application for approval as a food safety auditor in Western Australia.	N/A (please circle if not applicable)	
Signature _____	Date _____	

SECTION 9: PROFESSIONAL INDEMNITY INSURANCE

	Yes	No
Do you or your employer have Professional Indemnity/Public Liability Insurance that covers the scope of your work as an RFSA?	<input type="checkbox"/>	<input type="checkbox"/>
If Yes, please provide a copy of the certificate of insurance detailing:		
Name of Insurer:	_____	
Policy Number:	_____	

SECTION 10: APPROVAL (RENEWAL)- only complete this section if you are applying for approval to be renewed)

As part of the renewal process, auditors are required to provide a copy of five audit reports that have been submitted to local government (or if DOH please indicate which reports) in the previous 12 months for assessment by DOH, and a witness audit report. If you have not undertaken any audit functions in the previous 12 months, please provide information detailing how you maintained your standard of practice as an auditor with specific reference to maintaining your knowledge of the Act and audit management system and how you have maintained audit skills.

SECTION 11: APPLICATION FEES

Application fee	\$230.00 (GST included)	Must be paid with this application. This Fee is non-refundable.
-----------------	----------------------------	---

By Credit Card

Please charge my Mastercard Visa

Card No Card Expiry Date

Cardholder's Name (please print) _____

Cardholder's Signature _____ Amount Paid \$ _____

Or alternatively phone 9222 2000 for payment over the phone

SECTION 12: AUDITOR IDENTIFICATION REQUIREMENTS

Please sign your name within the confines of the box below using **BLACK INK** before returning it to the Department of Health.

Your signature will be scanned and will appear on your *Food Act 2008* certificate of authority as a food safety auditor.

Please print your name to be displayed on the certificate: _____

Please provide two colour passport photographs (ensure at least one photograph is verified with your name and signature on the back). Or a scanned high-resolution colour copy (min. 300dpi resolution).

SECTION 13: PROTECTING YOUR PRIVACY

Personal information collected and held by Department of Health may be used in order to provide approval and audit services, administer and manage administration systems, and inform you of our services and requirements. For more information on how we protect your privacy, please contact Department of Health.

SECTION 14: DECLARATION

I, (clearly print full name)

apply for approval as a *Food Act 2008* food safety auditor and:

- I enclose a signed copy (contained in the Code of Conduct section 12) of my declaration of understanding and compliance to the Code of Conduct
- I have read, understood and agree to comply with the provisions contained in Part 8 of the *Food Act 2008* and I must notify the DOH immediately of any changes to my personal details and circumstances that may affect my suitability to undertake the role of an RFSA.
- I understand that a 100 point identity check (*refer to WA Police website <https://www.police.wa.gov.au/Police-Direct/National-Police-Certificates/Proof-of-identity> for list of documents of identity and corresponding points allocated*) criminal record, qualifications and background check may be undertaken as part of the application process by the DOH;
- I have examined the Application Form and all supporting documents submitted by me. To the best of my knowledge this information is true, correct and complete;
- I understand that the application fee is non-refundable;
- I note that I will be subject to witness audit and check audits during the currency of my approval;
- I understand that the Department may require approved auditors to attend training sessions from time to time which will be at the auditor's own expense.

Signature:

Date:

APPLICATION FORM CHECKLIST

Please ensure your application contains the **following documentation** before submission to the Department of Health for processing.

For new applicants seeking approval:

- Section 4: Attach separate statements addressing Skills and Knowledge Selection Criteria that meet the requirements of the WA Food Regulation: Food Safety Auditing – Guideline for Regulatory Food Safety Auditors (on the Approval Process). Refer to Appendix 2 for further guidance regarding the selection criteria. Resumes/CVs are generally not acceptable.
- Section 5: Attach all evidence of qualifications/academic transcripts and evidence (where necessary) that qualification included 40 hours of microbiology.
- Section 6: Attach evidence (certified copies) of audit knowledge competencies.

All applications:

- Section 9 Provide copy of Professional Indemnity/Public Liability Insurance
- Section 11 Include payment of **\$230.00** non-refundable application fee
- Section 12 Include two colour passport photographs which at least one is verified with your name and signature on the back and ensure signature is in box. Or a scanned high-resolution colour copy (min. 300dpi resolution)
- Section 14: Sign declaration and separate signed declaration of understanding and compliance with the Code of Conduct.

If applicable:

- Section 3: Attach copy of certificate of approval as a food safety auditor in another jurisdiction.
- Section 7: Attach evidence (certified copies) of completion of appropriate competencies for auditing of high-risk activities and complex processes e.g. heat treatment processes.
- Section 8: Attach detailed explanation if answered 'yes' to any of the questions in this section.
- Section 10: Attach five audit reports (if already submitted to DOH as enforcing agency please indicate which reports) and a witness audit report (the scope of the witness audit report must correspond to the audit scopes applied for). Alternatively, if no audits have been completed in last 12 months evidence of how you maintained your standard of practice as an auditor with specific reference to maintaining your knowledge of the Act and audit management system and how you have maintained audit skills plus a witness audit report.

Please send all applications to:

Food Team
Environmental Health Directorate
Department of Health
PO Box 8172
Perth Business Centre WA 6849

Approved and signed

Dr Michael Lindsay
EXECUTIVE DIRECTOR
ENVIRONMENTAL HEALTH DIRECTOR
Public and Aboriginal Health Division
As the Delegate of the Chief Executive Officer

Appendix 2 - Further guidance on skills and knowledge – selection criteria (section 4 of application form)

Applicants may consider addressing the selection criteria regarding appropriate skills and knowledge by using the STAR (situation, task, actions, and results) concept. The STAR model is one way of presenting information against selection criteria and helps to highlight applicant's knowledge, understanding and work experience. For each criterion the applicant should try to address the following:

- **Situation** - Set the context by describing the circumstance where you used the skills or qualities and gained the experience.
- **Task** - What was your role/responsibilities?
- **Actions** - What did you do and how did you do it?
- **Results** - What did you achieve? What was the end result and how does it relate to an RFSA.

This concept helps to highlight an applicant's skills, knowledge, understanding and work experience related to a particular field and may be used to effectively demonstrate each of the five selection criteria statements.

New auditors (prior to submitting their application) may consider shadowing an approved RFSA or undertaking mock audits in order to gain the necessary experience not only to address the selection criteria, but to also adequately demonstrate the skills and knowledge necessary to become an RFSA.

1. **An in-depth understanding of the Food Standards Code; in particular a recent (within approximately 5 years) working knowledge of Chapter 3 (the Food Safety Standards).**

The applicant should write what their understanding of the Food Standard Code is, particularly Chapter 3 and avoid simply copying and pasting segments of the Food Standards Code. The applicant should instead give examples of real situations, where knowledge of the Food Standards Code was used and in particular the specific clause and standard. It could consist of the following:

1.1 What does Chapter 3 of Food Standard Code consist of?

1.2 An example of a situation (*try to provide a good example not merely the temperature probe was not calibrated*) where knowledge of this Chapter was required? Where was that, and what was the situation?

1.3 What was the task that you needed to do in that situation?

1.4 What was the action that you took in that situation and why?

1.5 What was the result of your action?

2. **An in-depth understanding of how the Food Safety Standards relate to the specific food industry sector the applicant is applying to audit (i.e. standard 3.3.1 or 4.2.4)**

2.1 Describe with examples how the food safety standards are related to a specific food industry, where you worked as an auditor?

2.2 Can you think of a situation, when you needed to use your knowledge of those standards? Where was that, and what was the situation?

2.3 What was the task that you needed to do in that situation?

2.4 What was the action that you took in that situation and why?

2.5 What was the result of your action?

3. **A demonstrated ability to interpret the requirements of the Western Australian Food Regulatory System, including the *Food Act 2008* and the Regulatory Food Safety Auditing Framework**
 - 3.1 What is the Western Australian Food Regulatory System? What is the *Food Act 2008*? What is the Regulatory Food Safety Auditing framework? Why are they important? Are they linked, and how?
 - 3.2 Can you think of situation, when you needed to use your knowledge of the Western Australian Regulatory System, including the *Food Act 2008* and the Regulatory Food Safety Auditing Framework? Where was that, and what was the situation?
 - 3.3 What was the task that you needed to do in that situation?
 - 3.4 What was the action that you took in that situation and why?
 - 3.5 What was the result of your action?

4. **Knowledge and demonstrated ability to carry out auditing of food safety programs/quality assurance plans/food safety management systems (whichever applicable)**
 - 4.1 Can you describe your knowledge and experience related to carrying out auditing of food safety programs/quality assurance plans/food safety management systems (whichever applicable)?
It is important here to convey your involvement during audits i.e. whether you identified any non-compliances yourself and what were they? Have you been involved in proposed action plans regarding non-compliance and how? Have you participated in writing audit reports and to what extent?
 - 4.2 Can you think of situation, when you needed to use your knowledge and your experience related to auditing of food safety programs/quality assurance plans/food safety management systems (whichever applicable)? Where was that, and what was the situation?
 - 4.3 What was the task that you needed to do in that situation?
 - 4.4 What was the action that you took in that situation and why?
 - 4.5 What was the result of your action?

5. **An understanding of the role of state (DOH) and local government in food regulation**
 - 5.1 What are the roles of state government (DOH) and local government in Western Australia?
 - 5.2 Can you think of situation, when you needed to use your knowledge of the role of state government and role of local government in Western Australia? Where was that, and what was the situation?
 - 5.3 What was the task that you needed to do in that situation?
 - 5.4 What was the action that you took in that situation and why?
 - 5.5 What was the result of your action?

You should ensure your application demonstrates specific examples (against each of the five individual selection criteria) that you have gained whilst working within the food industry. This will help the assessment of your working knowledge in order to become an RFSA.

Appendix 3 - Regulatory food safety auditor competencies and endorsements

General Auditor – Minimum qualifications

Table 1 below outlines the audit competencies, education and technical qualifications that the DOH requires for all approved RFSAs.

Industry	Food business activity	Audit competency	Education/Technical qualifications
Dairy	<p>Production of milk on farm (dairy primary production)</p> <p><i>Standard 4.2.4 Division 2 – General dairy primary production requirements</i></p> <p>Transportation of raw milk</p> <p><i>Standard 4.2.4 Division 3 (General dairy collection and transportation) and Division 4 (General dairy processing) where there is no heat treatment</i></p>	<p>FDFFSACA* or FDFFAU4001*/FBPAUD4001 (RABQSA-NFS1)</p> <p>FDFFSCOMA or FDFFAU4002A/FBPAUD4002 (RABQSA-NFS2)</p> <p>FDFFSFCSAA or FDFFAU4003A/FBPAUD4003 (RABQSA-NFS3)</p> <p>FDFFSCHZA or FDFFAU4004A/FBPAUD4004 (RABQSA-NFS4)</p> <p><small>*This competency may be superseded by a person who has already obtained competency FDFFSFCSAA/FDFFAU4003A/ FBPAUD4003</small></p>	<p>Certificate IV or higher in Food Science and Technology (FDF40311) or Certificate IV or higher in a related field (that includes 40 hrs food microbiology) or a qualification acceptable for approval as an Environmental Health Officer. <i>Anyone (e.g. Environmental Health Officers, authorised officer, quality assurance manager) who can demonstrate that they have relevant qualifications and sufficient recent practical experience in food safety assessment within the industry sector applicable, may be deemed competent.</i></p>
Vulnerable persons (service to six or more vulnerable persons at any given time)	<p>Food businesses subject to the requirements of standard 3.3.1 of the Food Standards Code, excluding those with a cook-chill process</p>	<p>FDFFSACA* or FDFFAU4001*/FBPAUD4001 (RABQSA-NFS1)</p> <p>FDFFSCOMA or FDFFAU4002A /FBPAUD4002 (RABQSA-NFS2)</p> <p>FDFFSFCSAA or FDFFAU4003A /FBPAUD4003 (RABQSA-NFS3)</p> <p>FDFFSCHZA or FDFFAU4004A/FBPAUD4004 (RABQSA-NFS4)</p> <p><small>*This competency may be superseded by a person who has already obtained competency FDFFSFCSAA/FDFFAU4003A/ FBPAUD4003</small></p>	<p>Certificate IV or higher in Food Science and Technology (FDF40311) or Certificate IV or higher in a related field (that includes 40 hrs food microbiology) or a qualification acceptable for approval as an Environmental Health Officer. <i>Anyone (e.g. Environmental Health Officers, authorised officer, quality assurance manager) who can demonstrate that they have relevant qualifications and sufficient recent practical experience in food safety assessment within the industry sector applicable, may be deemed competent.</i></p>

Specialised Auditor competencies – Minimum qualifications

To attain endorsements to audit specific high-risk processes, approved RFSA's must first meet the requirements of a general auditor. Auditors must also meet the criteria outlined in the specialised competency column of Table 2 below prior to being approved to audit those type of food business activities listed in column 2.

(If a dairy is producing raw milk cheese under Standard 4.2.4 Division 5 – there are additional requirements for raw milk cheese that the RFSA must be aware of and the RFSA should contact DOH for further information regarding competencies required).

Table 2: Specialised competencies for high risk processes

Industry	Food business activity	Specialised competency	Education /Technical qualifications
Dairy	Dairy processing <i>Standard 4.2.4 Division 4 (General dairy processing) that have a heat treatment process</i>	Auditor competency as detailed in Table 1 plus specialised competency FDFAU4007B/ FBPAUD5003: Audit a heat treatment process	Certificate IV or higher in Food Science and Technology (FDF40311) or Certificate IV or higher in a related field (that includes 40 hrs food microbiology). or a qualification acceptable for approval as an Environmental Health Officer. <i>Anyone (e.g. Environmental Health Officers, authorised officer, quality assurance manager) who can demonstrate that they have relevant qualifications and sufficient recent practical experience in food safety assessment within the industry sector applicable, may be deemed competent.</i>
Vulnerable persons (service to six or more vulnerable persons at any given time)	Food businesses subject to the requirements of Standard 3.3.1 of the Food Standards Code that have a cook chill process	Auditor competency as detailed in Table 1 plus specialised competency FDFAU4006A/ FBPAUD5002: Audit a cook chill process	Certificate IV or higher in Food Science and Technology (FDF40311) or Certificate IV or higher in a related field (that includes 40 hrs food microbiology) or a qualification acceptable for approval as an Environmental Health Officer. <i>Anyone (e.g. Environmental Health Officers, authorised officer, quality assurance manager) who can demonstrate that they have relevant qualifications and sufficient recent practical experience in food safety assessment within the industry sector applicable, may be deemed competent.</i>

This document can be made available in alternative formats on request for a person with a disability.

© Department of Health 2021

Copyright to this material is vested in the State of Western Australia unless otherwise indicated. Apart from any fair dealing for the purposes of private study, research, criticism or review, as permitted under the provisions of the *Copyright Act 1968*, no part may be reproduced or re-used for any purposes whatsoever without written permission of the State of Western Australia.