



WA food regulation: food safety auditing – guideline for regulatory food safety auditors (on the approval process)

Version 3

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Approved by Managing Scientist – Food

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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 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 Department of Health 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 Department of Health, 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 competencies for high-risk processes for 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 ***'WA food regulation: WA Health regulatory food safety auditor approval process policy'* superseded**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 Department of Health 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 Department of Health, 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 on the Department of Health website .
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).

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 in section 9, or through [Automatic Mutual Recognition](#)) 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 (Department of Health 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 [Department of Health website](#). 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.

For those RFSAs applying under the AMR scheme this is a separate process to that detailed below, and the RFSAs must be eligible to work in WA under the new [AMR scheme](#) (refer to website for specific details) and must notify the Department of Health by completing the [Automatic Mutual Recognition Notification Form \(PDF 997KB\)](#) prior to commencing work in WA. In addition:-

- RFSAs must hold a licence or approval in their home state.
- The scope of work in WA is limited to the scope of work in the RFSAs home jurisdiction
- Must also comply with the WA Food Act 2008 and WA Code of Conduct

9. Criteria for approval

All new RFSAs 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. RFSAs competencies and endorsements are detailed in Appendix 2.

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 1070 1433 1552"> <thead> <tr> <th>Unit of competency code</th> <th>Unit title</th> </tr> </thead> <tbody> <tr> <td>FDFFSACA* or FDFFAU4001A*/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>FDFFSCFsAA 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 FDFFSCFsAA/FDFFAU4003A/FBAUD4003</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 FDFFAU4001A*/FBPAUD4001 (RABQSA-NFS1)	Assess compliance with food safety programs	FDFFScoma or FDFFAU4002A*/FBPAUD4002 (RABQSA-NFS2)	Communicate and negotiate to conduct food safety audits	FDFFSCFsAA 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 FDFFAU4001A*/FBPAUD4001 (RABQSA-NFS1)	Assess compliance with food safety programs										
FDFFScoma or FDFFAU4002A*/FBPAUD4002 (RABQSA-NFS2)	Communicate and negotiate to conduct food safety audits										
FDFFSCFsAA 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</p>										

Criteria for approval

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.

3. Possession of appropriate competencies for auditing of high-risk activities and complex processes

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 assessed as competent to undertake auditing of these activities.

Specialised process	Unit of Competency Code	Unit Title
Cook Chill	FDFFSCC4A/FDFFAU4006A/ FBPAUD5002	Audit a cook chill process
Heat treatment processes	FDFFSHT4A/FDFFAU4007A/ FDFFAU4007B/ FBPAUD5003	Audit a heat treatment process
Ready to eat (RTE) meat products	FDFFSME4A/FDFFAU4008A/ FBPAUD5004	Audit manufacturing of RTE meat products
Raw oysters and bivalve production and processing	FDFFSBM4A/FDFFAU4005A/ 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 Department of Health 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 Department of Health 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

Criteria for approval

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 Department of Health to verify the accuracy and integrity of this information from time to time.

RFSAs must provide certain insurance details and ensure they have an adequate level of professional indemnity/public liability insurance cover in place and notify the CEO of any changes in insurance information within 14 days (Food Act section 96A(5)).

6. Appropriate skills and knowledge regarding WA's food regulatory system

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 Department of Health:

- 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 *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 the State (Department of Health) and local government in food regulation.

Criteria for approval

Further guidance on completing the five selection criteria above is contained within Appendix 1.

7. Satisfactory completion of a witness audit

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.

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 Department of Health's website '[List of approved WA RFSAs](#)'. The RFSAs may commence audits in their endorsed industry sectors. The certificate of authority card remains the property of the Department of Health. If an auditor's approval is cancelled, the card is to be returned immediately to the Department of Health. 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 Department of Health) 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 Department of Health (second jurisdiction) of his or her approval in the first jurisdiction. This application must also provide the Department of Health (second jurisdiction) with the consent to access such information and particulars as is required to process the application. The Department of Health 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 2020.

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 (and newly approved RFSAs within first six months) must 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 or can provide documented evidence of equivalence that satisfies the CEO, deeming the RFSAs 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 Department of Health over the term of approval;
- Submission of audit records to Department of Health when required;
- RFSAs shall not subcontract the performance of any regulatory food safety audit services. RFSAs 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 RFSAs
- RFSAs 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 Department of Health upon request
- RFSAs 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 Department of Health 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 Department of Health 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 Department of Health 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 Department of Health 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 RFSA's may not conduct regulatory audits in areas outside their scope of approval. Approved RFSA's wishing to change or upgrade their scope of approval must re-apply to the Department of Health 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 \(on the Audit and Reporting Requirements\)](#).

Appendix 1 - 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 (Department of Health) and local government in food regulation**
 - 5.1 What are the roles of state government (Department of Health) 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 2 - Regulatory food safety auditor competencies and endorsements

General Regulatory Food Safety Auditor – Minimum qualifications

Table 1 below outlines the audit competencies, education and technical qualifications that the Department of Health 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 regulatory food safety 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 Department of Health for further information regarding competencies required).

Table 2: Specialised competencies for high-risk processes currently subject to regulatory food safety audits.

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>

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