Audit Report

Global Standard for Packaging and Packaging Materials Issue 4 : February 2011

1. Audit Summary			
Company Name:	Cumberland Packaging	Site name:	Shoeburyness
Audit Category:	**Low Hygiene Risk**	BRC Site Code:	4477975

2. Results			
Audit Result:	**CERTIFICATED**	Audit Grade:	A
		Audit Frequency :	12 months

3. Audit Details			
Audit Start Date:	2013-01-07	Audit Finish Date:	2013-01-07
Re-audit Due Date:	2014-01-06	Previous Audit Date:	2012-01-04
Auditor Number (one only : team leader)		Auditor Names	
110020		Anis Munshi	

4. Scope Details	
Packaging Field:	
02 - Paper	
Select a packaging field	
Select a packaging field	
Select a packaging field	
Scope of Audit:	Manufacture of die cut printed and plain corrugated boxes, and polystyrene packaging for void fitments in corrugated boxes
Exclusions from Scope:	None
Non-applicable clauses:	
3.4.4, 4.1.6, 4.3.2, 5.2.6, 5.4.5, 5.5, 5.6, 6.4.4	
Products in production at the time of the audit:	
Plain and printed corrugated cartons and fitments	

5. Company Profile

The Company was established in 1985 and produces die cut printed and plain corrugated boxes, and polystyrene packaging for void fitments in corrugated. The company manufactures the products for a variety of industry sectors including food and pharmaceuticals. There is no particular bias of any industry sector.

The site has ten machines in total which includes a case maker with two colour printing stations, crease and cutting machinery as well as the necessary ancillary equipment. The Company employs around 50 people who work a one shift system, with extended hours as required. The site holds Investors in People and is an NVQ approved training centre for fibreboard conversion level 2, and also holds an award issued by the Sheet Plant Association.

The overall site is 15608sqm, while the buildings occupy 7804sqm.

6. Non-Conformity Summary

Summary of Non-Conformity Raised

	No.		No.
Critical non-conformity	0	Major non-conformity	0
Major non-conformity against statement of intent of a Fundamental clause	0	Minor non-conformity	5

Critical

No.	Requirement ref.	Detail of Non-Conformity	Proposed audit date	Reviewed by

Major against SOI of a Fundamental Clause

No.	Requirement ref.	Detail of Non-Conformity	Proposed audit date	Reviewed by

Major

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken (with consideration of root cause)	Evidence provided Document Photograph Visit/Other	Date signed off	Reviewed by

Minor

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken (with consideration of root cause)	Evidence provided Document Photograph Visit/Other	Date signed off	Reviewed by
1	2.2.4	The process flow diagram does not include subcontracted operations				
2	4.8.2	There was no warm water provided in the men's toilets				
3	4.11.2	Crawling insect bait found not closed properly				
4	4.12.8	Vehicles used for delivery are not checked for hygiene prior to loading				
5	6.2.1	Site plan in place does not show access points, travel routes or staff facilities				

7. Company Details

Company Name : Cumberland Packaging Ltd	
Site Name : Shoeburyness	
Address : Unit 2, Bay 6 Campfield Road, Shoeburyness, Southend on Sea, Essex	
Country : UK	Postcode : SS3 9BX
Telephone : 01702 298014	Fax : 01702 298015
Company Representative Name: John Watson	
Email : jwatson@cpholdings.co.uk	

8. Key Personnel

Name/Job Title	Present at Audit (x)			
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
John Watson – Managing Director	X	X	X	X

9. Audit Duration Details

On-site audit duration 8 Man Hours
Duration of production facility audit 3 Man Hours
Reasons for deviation from typical (12 hours) or expected on-site audit duration or typical (3 hours) site inspection duration. Small compact site with simple linear process. Documents readily available and well managed. Auditor familiarity with site. Complies with PO 51

10. Audit Duration per day

	Start time	Finish time
Day 1	9.00	17.00

Detailed Audit Report

BRC Requirement No.	REQUIREMENT	Conforms Y, N or N/A	Details

1. SENIOR MANAGEMENT COMMITMENT AND CONTINUAL IMPROVEMENT

1.1 Product Safety and Quality Management System

SOI	The senior management shall commit the company to producing products to the specified quality and which are safe and legally compliant.	Y	A hygiene and quality policy is in place signed by the Managing Director stating the company's intention to produce safe and legally compliant products ref "Statement of Intent and Objective" issued 1/2/2012, issue 2. The policy has been signed by the MD, Sales Director, Production Director and Production Quality & Hygiene Manager. The policy is communicated to personnel by having it displayed it in reception and is also included in the quality manual.

	1.1.1	Y	1.1.2	Y	

1.2 Senior Management Commitment — FUNDAMENTAL

SOI	The company's senior management shall demonstrate that they are fully committed to the implementation of requirements of the Global Standard for Packaging and Packaging Materials. This shall include provision of adequate resources, effective communication and systems of management review to effect continual improvement. Opportunities for improvement shall be identified, implemented and fully documented.	**Y**	
1.2.1	The company's senior management shall ensure that product safety and quality objectives are measurable, established, documented, monitored and reviewed.	**Y**	The company's management ensure that objectives are measured via 10 KPI's which relate to sales, productivity, on-time deliveries, customer satisfaction, customer complaints, debtors control, response to costing's, overhead control, continuous improvement. Example seen for customer satisfaction which is done with 15 different customers on a monthly basis with a target score of 8 which is currently being exceeded On time delivery is measured as an average for the year, in 2011 it was 93.8, last year the company achieved 94.41
1.2.2	The company's senior management shall have a system in place to ensure that the company is kept informed of all relevant legislative, scientific and technical developments, and industry codes of practice applicable in the country manufacture and, where known, the country in which the packaging material will be sold.	**Y**	The company is kept informed of relevant legislation and scientific developments by the Sheet Plant Association (represent 75% of the industry sector). All products manufactured are sold in the UK only.
1.2.3	The company shall ensure that the materials manufactured comply with the relevant legislation (including any legislation concerning the use of recycled content) in the country of manufacture and in which the products are intended to be sold and/or ultimately used, where known.	**Y**	Products supplied comply with the relevant UK legislation i.e. health and safety legislation, reach etc. The waste produced is collated and forwarded for recycling to company's it has contracts with
1.2.4	The company's senior management shall ensure that non-conformities identified at the previous audit against the Standard are effectively actioned.	**Y**	The company received 7 non-conformities last year which were successfully closed out
1.2.5	The company shall have a current, original copy of the Standard available on site.	**Y**	Copy of standard available on site
1.2.6	Where the company is certificated to the Standard they shall ensure that recertification audits occur on or before the audit due date indicted on the certificate.	**Y**	The audit is late by one day due to factory shutdown and Christmas holidays. Within 7 day grace period allowed from BRC.

1.3 Organisational structure, responsibilities and management authority					
SOI	The organisational structure shall be clear, with defined responsibilities, and key staff shall be aware of their responsibilities with regard to packaging safety and quality.			Y	There is an up to date organisation chart in place ref "Management Responsibility" dated 3/9/2009 issue 1. The Managing Director is the Designated Hygiene Manager and the Production Director is the Deputy Hygiene Manager
	1.3.1	Y	1.3.2	Y	
1.4 Management review					
SOI	Opportunities for continuous improvement of the product safety and quality programme shall be identified and effectively implemented through management reviews of the product safety system and results.			**Y**	The management review is conducted on a quarterly basis with the last review taking place on Oct 2012 ref M.R.M.5. The review process included: - Previous management review meeting notes, seen for meeting held on 18th July 2012. - Incidents, corrective actions i.e. target for 2012 was 1%, actually achieved 0.56% in third quarter - Resource issues raised in meeting on 9th May 2012, relating to the purchase of a refurbished multi-point gluer have been addressed Records of last and previous management review meetings were seen (as indicated above) and were found to be comprehensively documented including actions required and by whom, and when completed
	1.4.1	Y	1.4.2	Y	
	1.4.3	Y			
2. HAZARD AND RISK MANAGEMENT SYSTEM					
2.1 Hazard and risk management team					
SOI	The hazard and risk management system shall be managed by a multidisciplinary team competent in hazard and risk analysis.			**Y**	The hazard risk team comprises of the Managing Director, Production Manager, and two Production Operatives. The Team leader is the MD. Training was done by an external consultant from a company called "Scope Business Systems Management Services" and the hazard and risk was developed in 2009
	2.1.1	Y			
2.2 Hazard and Risk Analysis				**FUNDAMENTAL**	
SOI	The company shall establish the effectiveness of its prerequisite programmes through a hazard and risk analysis and identify and implement any further risks to the safety and legality of products.			**Y**	
2.2.1	The scope of the hazard and risk analysis shall be clearly defined and shall cover all products and processes included within the intended scope of certification.			**Y**	The scope is defined as the "Manufacture of die cut printed and plain corrugated boxes, and polystyrene packaging for void fitments in corrugated boxes "
2.2.2	The hazard and risk analysis team shall maintain awareness of and take into account: • historical and known hazards associated with specific processes, raw materials or end use of the product • relevant codes of practice or recognised guidelines • legislative requirements.			**Y**	The team maintain awareness and has taken into account: - historical and known hazards associated with the various processes e.g. via customer complaints, machinery breakdown etc. - relevant codes of practice e.g. sheet plant association - legislative requirements e.g. industry association
2.2.3	A full description of the packaging produced by product or product group and its intended use shall be documented.			**Y**	The packaging produced is plain or printed corrugated packaging, closures, die cuts, and fittings along with polystyrene and foam packaging products which are used for protection and distribution purposes

2.2.4	A process flow diagram shall be prepared for each product, product group or process. This shall include each process step from the receipt of raw materials to despatch to the customer. The process flow shall as a guide include, as relevant: • receipt and approval of art work • receipt and preparation of raw materials such as additives, inks and adhesives • each manufacturing process step • the use of rework and post-consumer recycled materials • any sub-contracted operations • customer returns. The accuracy of the process flow shall be verified by the hazard and risk analysis team.	**N**	A process flow diagram is in place ref Issue 1 dated 3/9/2009 ref "Process Control Flow Chart" and has been verified by the hazard and risk analysis team, and includes: The items listed e.g. receipt and approval of artwork, manufacturing steps, preparation of raw materials etc. A small proportion of work is subcontracted but is currently not indicated on the process flow
2.2.5	The hazard and risk analysis team shall identify and record all potential hazards that are reasonably expected to occur at each step in relation to the product and process The hazards considered shall include, where relevant: • foreign objects • chemical contamination (e.g. taint, odour, allergen, component transfer from inks, varnishes and glues) • hazards that may have an impact on the functional of the final product in use.	**Y**	The hazard and risk team has identified and recorded potential hazards that occur at each step of the production process in the process flow diagram e.g. - Foreign objects e.g. wood splinters, jewellery etc. - Chemical contamination e.g. oil, lubricants etc. - Hazards which may impact on functionality e.g. dust and dirt, assembly etc.
2.2.6	The hazard and risk analysis team shall identify control measures necessary to prevent, eliminate or reduce each hazard to acceptable levels.	**Y**	The hazard and risk team has identified suitable control measures for identified hazards e.g. cleaning instructions on the machines, foreign objects check on the machines, in process checks on the products etc.
2.2.7	For each hazard that requires control, the control points shall be reviewed to evaluate if existing prerequisites are effective in providing control. Where greater controls are required to the prerequisite programmes, improvements shall be implemented to ensure control is achieved.	**Y**	Each hazard that requires control is reviewed on a regular basis in the management review meetings by the management team
2.2.8	A review of the hazard and risk management system shall be carried out at least once per year and following any significant incidents or when any process changes. The review shall include a verification that the hazard and risk analysis plan is effective and may include a review of: • complaints • product failures • recalls • product withdrawals • results of internal audits of prerequisite programmes • results from external third-party auditors.	**Y**	The hazard and risk management was last carried out on 10/10/2012 and included all the relevant items indicated e.g. complaints, audits etc. The review team discuss if there are any changes and if any are identified they are recorded in the management review. Evidence was seen and is recorded in the Management Reviews ref section 11 of the report
2.3	**Exemption of requirements based on risk analysis**		
SOI	The site has demonstrated adequate compliance with the requirements of this clause.	**Y**	The hazard and risk is fully supported by the pre-requisite programs in place, and there are no exemptions to the standard
	2.3.1 Y 2.3.2 Y		

3 PRODUCT SAFETY AND QUALITY MANAGEMENT SYSTEM

3.1 Product safety and quality manual

SOI	The company shall have a manual that describes how the requirements of the Standard are met. These requirements shall be fully implemented, reviewed at appropriate planned intervals and improved where necessary.					**Y**	There is a "Hygiene Quality and Good Manufacturing Practice Policy Document" in place which has the appropriate procedures in place. The Managing Director holds the master copy and the sub- sections, which are available to all relevant personnel if required via the company's server
	3.1.1	Y	3.1.2	Y			

3.2 Customer focus and contract review

SOI	The company shall ensure that customer needs and expectation with respect to quality and safety are identified and met, and that communication channels are clear.					**Y**	Customer requirements and needs are identified via the internal and external sales team. The measure used to see if customer requirements have been met is via the use of a web based computer system. The company has currently exceeded its customer satisfaction target of 8.0 by achieving a result of 8.4 in 2011
	3.2.1	Y					

3.3 Internal audits — FUNDAMENTAL

SOI	The company shall establish through a programme of internal audits that the implementation of the requirements of the Standard are in place, appropriate and complied with.	**Y**	
3.3.1	Internal audits shall be planned and their scope and frequency shall be established in relation to the risks associated with the activity. Audits shall be scheduled so that all aspects of the Standard are audited at least annually.	**Y**	The internal audits are planned and a schedule is in place covering all the areas. The audit plan for 2013 is in place ref H.S.A.S.1 "Hygiene And Quality Management Systems (Audit Schedule)"
3.3.2	Audits shall be conducted by personnel who are competent, and sufficiently independent from the department being audited to ensure impartiality.	**Y**	Audits are conducted by the Production Manager, Sales Manager, MD, Sales Representative, Admin Manager, Transport Manager. All the members have had audit training from "Scope Business Management Services" or internally
3.3.3	Deficiencies and details of non-conformities shall be notified to appropriate supervisory staff and corrective action implemented within a specified and appropriate time period.	**Y**	Internal audits recorded on Quality and Hygiene Audit Trail Sheet. Non-conformities are recorded, allocated to a specific person with a completion date and examples were seen
3.3.4	The completion of corrective action shall be recorded and verified.	**Y**	Corrective action is recorded and verified in the Management Review meeting
3.3.5	Conformity as well as non-conformity shall be clearly identified and verified within the internal audit report.	**Y**	Company records both non-conformity and conformity e.g. and seen for production for hygiene, protective clothing compliance etc.

3.4 Supplier approval and performance monitoring

SOI	The company shall ensure that suppliers of goods and services are operating in a manner that ensures that product quality and safety is not compromised and specifications can be achieved.					**Y**	There is a documented supplier approval procedure in place ref Assessment of Suppliers and Contractors issue no 1 dated 3/9/2009 and an assessment program ref Supplier/Sub-Contractor Questionnaire S.S.Q.1 As part of the assessment a company is checked to see if they have any or some of the following: - BRC/ISO certification etc. - Via supplier audit - Via supplier questionnaire - Length of service The company only uses two suppliers for board, one for inks, two for stretch-wrap etc. Suppliers once approved are monitored on performance based on internal audits (rejects/claims/price).
	3.4.1	Y	3.4.2	Y			The company only uses approved suppliers
	3.4.3	Y	3.4.4	N/A			

3.5 Subcontracting of production					
SOI	Subcontractors shall be effectively managed to prevent any risk of contamination or damage and ensure product is produced to specification.			**Y**	CRP (box manufacturer) and CAPS Cases are used to subcontract work and both have been approved as per clause 3.4. Both are BRC approved and have gone through the risk assessment process. Specifications are the same as the ones used by the company internally. Subcontracted goods are inspected in goods in prior to shipment to the customer.
	3.5.1	Y	3.5.2	Y	
	3.5.3	Y	3.5.4	Y	
3.6 Documentation control					
SOI	Documentation essential to the management and control of product safety, legality and quality shall be relevant, controlled and available, as the correct version, to the appropriate personnel.			Y	There is a document control procedure in place ref "Document Control", and is readily accessible by relevant personnel via MD hard copy or on the company server. Changes are controlled via "Policy Document Amendment Control Sheet". The issue number and date is updated.
	3.6.1	Y	3.6.2	Y	
3.7 Specifications				**FUNDAMENTAL**	
SOI	Appropriate specifications shall exist for raw materials, intermediate and finished products, and any product or service that could affect the integrity of the finished product.			Y	
3.7.1	Specifications shall be suitably detailed, accurate and shall ensure compliance with relevant product safety and legislative requirements.			**Y**	Specifications are detailed, accurate and comply with all relevant legislative requirements
3.7.2	The company shall seek formal agreement of specifications with relevant parties. Where specifications are not formally agreed then the company shall be able to demonstrate that they have taken steps to put an agreement in place.			**Y**	Specifications are approved by the customer during the contract stage, prior to any manufacturing taking place
3.7.3	Trademarks for application on packaging materials shall, where appropriate, be formally agreed between relevant parties.			**Y**	Customers supply artwork for trademarks if required which they approve on a sample pack during the contract stage prior to production commencing
3.8 Record Keeping					
SOI	The company shall maintain records to demonstrate the effective control of product safety, legality and quality.			**Y**	Suitable records are kept e.g. Audit Status Report, Meeting Agenda, Vehicle Cleaning Schedule etc. range from 6 to 36 months depending on record
	3.8.1	Y			
3.9 Traceability				**FUNDAMENTAL**	
SOI	The company shall have a system in place to identify product batches and to trace and follow all raw materials through processing to the distribution of the finished product to the customer. Records shall be retrievable in a timely manner.			**Y**	
3.9.1	An appropriate system shall be in place to ensure that the customer can identify a product or production lot number for the product for the purposes of traceability.			**Y**	The company has a suitable traceability system in place based on the works order number (i.e. production batch number)
3.9.2	The system shall be tested to ensure traceability can be determined from raw materials to the finished product and vice versa. This test shall take place at least annually.			**Y**	The system is tested on annual basis and is capable of being done from raw materials to finished product and vice versa. The company performs a trace every time a customer complaint is received and was demonstrated for a customer receiving a wrong coloured board case. It was traced back to the board supplier who was at fault.

3.10 Complaint handling					
SOI	All complaints made by customers and consumers shall be recorded and investigated. Corrective actions where required shall be implemented and recorded.			**Y**	Complaints are recorded on a computer database via the complaints procedure and are all investigated. Corrective actions are discussed by senior managers and solutions implemented and monitored. All complaints are recorded by month and type e.g. gluing, printing etc. In 2012 the total complaints for orders delivered was 0.66%
	3.10.1	Y			
3.11 Management of incidents, product withdrawals and recalls					
SOI	The company shall have a plan and systems in place to effectively manage incidents and if required the withdrawal or recall of products, in order to ensure that all potential risks to the quality and hygiene and legality of products are controlled.			**Y**	Product recall procedure in place ref Product Recall 3.12.3 and all relevant personnel are trained. Product Recall procedure has identified: - Key personnel - Communication plan - Corrective action - Review An example was seen for Product Recall Incident Report P.R.I.R.1. The test is done annually and was seen last one conducted on 3/12/2013 for wrong grade of board being delivered. Key personnel involved are Customer Services, Transport Manager and Production Director. Customer informed via email, and goods are quarantined pending decision
	3.11.1	Y	3.11.2	Y	
	3.11.3	Y	3.11.4	Y	
4. SITE STANDARDS					
4.1 External standards					
SOI	All grounds within the site shall be finished and maintained to an appropriate standard.			**Y**	The company is on a self-contained unit, and grounds are well maintained. The external building fabric is fairly new as it was re-clad, and no silos or pipes are used for raw materials. When the building was built a suitable drainage system was installed. Traffic routes are suitably maintained and office personnel turn into designated car park, and product carriers have to go into yard due to height restrictions placed for access into the car park.
	4.1.1	Y	4.1.2	Y	No external storage used
	4.1.3	Y	4.1.4	Y	
	4.1.5	Y	4.1.6	N/A	
4.2 Building fabric and interiors					
SOI	The internal site, buildings and facilities shall be suitable for the intended purpose. All utilities to and within the production and storage areas shall be designed, constructed, maintained and monitored to effectively control the risk of product contamination.			**Y**	Walls floors, etc. are suitably maintained, and windows doors etc. are kept proofed and closed. Suitable and sufficient lighting is provided for a safe working environment, and risk of glass breakage is minimal Suitable and sufficient ventilation is provided
	4.2.1	Y	4.2.2	Y	
	4.2.3	Y	4.2.4	Y	
	4.2.5	Y			
4.3 Utilities					
SOI	Product cleanliness and integrity shall not be compromised by the location, construction and delivery of the utilities to and within the production and storage areas.			**Y**	Mains water is used for cleaning print rollers, which is disposed of in the main drainage system
	4.3.1	Y	4.3.2	N/A	Compressed air is not used

4.4	**Security**				
SOI	Product and process integrity shall be assured through appropriate site security provision.			**Y**	A risk assessment has been carried out for security ref CPL ISMS-Risk Assessment issue 1 dated 6/8\2012. Access is through the main entrance for all employees and visitors and a reporting system is in place ref "Visitors and Contractors Health Questionnaire". All staff is suitably trained in site security. Majority of the work is carried out by company employees, if contractors are used the Production Supervisors will supervise them throughout their stay. Contractor Duties are outlined and signed. Third party transport personnel report to the production area via the yard entry. There is a service agreement in place for software are backed up on a daily basis and taken off site.
	4.4.1	Y	4.4.2	Y	
	4.4.3	Y	4.4.4	Y	
	4.4.5	Y	4.4.6	Y	
4.5	**Layout and Product Flow**				
SOI	Premises and plant shall be logically designed, constructed and maintained.			**Y**	The process flow from raw materials to finished goods is arranged to minimise the risk of contamination Premises provide adequate space for working and storage. All WIP is suitably labelled at each stage of the process and identified by the pallet label which follows it from raw materials through to finished product.
	4.5.1	Y	4.5.2	Y	
	4.5.3	Y			
4.6	**Equipment**				
SOI	Product safety, legality and quality shall be ensured through the use of appropriate equipment that shall be properly designed and maintained.			**Y**	The company installed a new multipoint gluer in Aug 2012. The machine was sourced from a company the company has purchased machines from before. validated prior to going into routine production, and a maintenance program has been established with the manufacturers
	4.6.1	Y			
4.7	**Maintenance**				
SOI	Proper maintenance and monitoring of all equipment critical to product safety, quality and legality shall ensure consistent high levels of product safety, functionality and quality.			**Y**	A preventative maintenance program is in place for all the equipment used on site, and was seen for the Folder Gluer Eterna which is done weekly and an annual check by the maintenance company. No temporary engineering observed. A line clearance is performed after maintenance work prior to production starting. Engineering workshops are controlled to minimise the risk of contamination
	4.7.1	Y	4.7.2	Y	
	4.7.3	Y	4.7.4	Y	
4.8	**Staff Facilities**				
SOI	Staff facilities shall be sufficient to accommodate the required number of personnel, and designed and operated to minimise the risk of product contamination. Such facilities shall be kept in a good and clean condition.			**Y**	Suitable hand washing facilities are provided Toilets seen were in reasonable condition with soap, towels and advisory signs in place. Eating, drinking is only permitted in designated room, and all external personnel have to comply with the company's hygiene policy. No warm water available in men's toilets
	4.8.1	Y	4.8.2	N	
	4.8.3	Y	4.8.4	Y	

4.7 Housekeeping and Cleaning				**FUNDAMENTAL**	
SOI	Housekeeping and cleaning systems shall be in place, which ensure that appropriate standards of cleanliness are maintained and that risk of contamination to the product is minimised.			**Y**	
4.9.1.	Good standards of housekeeping shall be maintained, which shall include a 'clean as you go' policy.			**Y**	Company has a "clean as you go policy" in place
4.9.2	The cleaning of production equipment and internal surfaces of storage and production facilities shall be effectively managed using cleaning schedules			**Y**	Cleaning schedules are located on the machines, and in the appropriate areas and were seen for Die Press dated 6/6/2012, Rotary dated 17/12/2012 and found to be up to date and compliant
4.9.3	Cleaning chemicals shall be fit for purpose, suitably labelled, secured in closed containers and used in accordance with manufacturers' instructions. Materials and equipment used for cleaning toilets shall be segregated from those used elsewhere.			**Y**	General purpose is water, Flexi clean used for cleaning printing rollers which is disposed of in the main drains Toilets are cleaned using standard household bleach etc. and stored in a separate locked cupboard in production office
4.10 Waste and waste disposal					
SOI	Suitable facilities shall be in place for the storage and disposal of process and other waste.			**Y**	Waste water is taken Anglian water (trade effluent) Waste cardboard is recycled by being sent to the baler using conveyors and strapped. The company uses: Keeble – recycled cardboard waste registration number CB/BP3111YF, TLM Management Ltd – domestic material waste licence no CB/QP3291UK Substandard trademarked material is destroyed on site prior to being baled and recycled
	4.10.1	Y	4.10.2	Y	
4.11 Pest Control					
SOI	The company shall be responsible for minimising the risk of pest infestation on the site.			**Y**	There is a pest control program in place, and use an external contractor called Prestige Pest Control Services who are a member of National Pest Technicians Association (Membership No 1824) Expiry 5th April 2013. The company visits 4 times per year to check the EFK's and 8 times year for mice, rats etc. Pest control records were examined seen for visits made by contractor, and a site plan with the locations. The safety data sheet was seen for the bait used by the contractor "Roban Whole Wheat Bait" (HSE No:7205) was seen Crawling insect bait found not sealed properly
	4.11.1	Y	4.11.2	N	
	4.11.3	Y	4.11.4	Y	
4.12 Transport, storage and distribution					
SOI	The risk of contamination of raw materials and finished products shall be minimised whilst in transport, storage or distribution.			**Y**	Finished products/materials are not transferred externally, and all materials are suitably identified. All incoming goods are examined for damage etc. prior to being rejected or accepted. No damaged or contaminated pallets are used. WIP is suitably labelled with the order number, barcode number etc. Material for recycling is baled and strapped and stored in a specified location, and no off-site storage is used. Company own their own fleet. Of 7 trucks. When required the company also uses external companies e.g. Triple A Transport, MPG Transport, Atlas Courier Express Ltd, Vehicles used for delivery are not checked for hygiene prior to loading
	4.12.1	Y	4.12.2	Y	
	4.12.3	Y	4.12.4	Y	
	4.12.5	Y	4.12.6	Y	
	4.12.7	Y	4.12.8	N	
	4.12.9	Y	4.12.10	Y	

5 PRODUCT AND PROCESS CONTROL

5.1 Product Design and Development

SOI	Product design and development processes shall be in place to ensure the production of safe and legal products to defined quality parameters.				**Y**	The vast majority of the customers provide their own design only a small percentage is designed in house. Products are designed by the design manager, to meet customer requirements and samples produced for approval. A specification is produced for each item and agreed with the customer prior to beginning routine production. The company retains CAD drawings for future reference, any changes lead to the specification being updated
	5.1.1	Y	5.1.2	Y		
	5.1.3	Y	5.1.4	Y		
	5.1.5	Y				

5.2 Packaging Print Control

SOI	Processes shall be in place to ensure that print quality meets agreed specifications and critical print content such as allergen/safety/legal information is fully legible and correctly printed.				**Y**	The company uses start up checks to ensure there is no loss of information. Printing plates are numbered and stored in numerical order in racks, and print is approved prior to routine production. Certain checks are performed as per industry standard to identify printing errors e.g. registration, print quality etc. Standard is the print specification approved by the customer from the initial run and saved subsequently from the last run to date. The company does not keep samples of printed packaging, but does retain CAD drawings indefinitely. Unused printed product is suitably destroyed, baled and recycled. Quality checks are performed by the operators who have been suitably trained, and no inspection cabinets used
	5.2.1	Y	5.2.2	Y		No composite printing done
	5.2.3	Y	5.2.4	Y		
	5.2.5	Y	5.2.6	N/A		
	5.2.7	Y	5.2.8	Y		
	5.2.9	Y	5.2.10	Y		

5.3	**Process Control**			**FUNDAMENTAL**	
SOI	The production process shall be controlled through effective quality assurance of operations to ensure packaging materials can be consistently produced to the quality specified by customers.			**Y**	
5.3.1	The company shall undertake a review of the manufacturing and, where applicable, printing process to identify critical manufacturing process control points that could affect the quality of the products produced.			**Y**	No CCP's identified
5.3.2	For each critical manufacturing process control point, machine settings or process limits shall be established and documented – the process specification.			**Y**	No CCP's identified
5.3.3	Documented process checks shall be undertaken at start up, following adjustments to equipment, and periodically during production, to ensure products are consistently produced to the agreed quality specification.			**Y**	Examples of checks performed are e.g. case maker - Start-up e.g. dimensions, slot depth register, creases, batch number, machine quality check sheet etc. - Board condition - One case checked every hour
5.3.4	A clearance procedure shall be in place to ensure that at start up, the line is clear of all previous work and production documents.			**Y**	Line clearance procedure in place ref C.M.S.1
5.3.5	In the event of changes to product composition, processing methods or equipment, the company shall, where appropriate, re-establish process characteristics and validate product data to ensure product safety, legality and quality are achieved.			**Y**	No changes have occurred which could impact on the product, if changes are made then the process would be re-validated
5.4	**Product inspection and analysis**				
SOI	The company shall use appropriate procedures and facilities when undertaking or subcontracting inspection and analyses critical to product safety, legality and quality.			**Y**	Quality checks are carried out during different stages e.g. from receipt of raw materials to finished products ref "Quality Inspection and Checks". The checks are performed in goods in and on-line by the operators who have been suitably trained. The frequency of checks are as per industry standard, and procedures are in place for each stage of the process
	5.4.1	Y	5.4.2	Y	No material is analysed externally
	5.4.3	Y	5.4.4	Y	
	5.4.5	N/A			
5.5	**In-line testing and measuring equipment**				
SOI	In-line measuring or product testing equipment, where used, shall be tested and maintained to ensure it is effective in ensuring product safety integrity and quality.			**N/A**	
	5.5.1	N/A	5.5.2	N/A	No in-line testing equipment used
5.6	**Calibration**				
SOI	Where specialist measuring is required to assess compliance with product safety and legality, the devices shall be maintained and calibrated.			**N/A**	
	5.6.1	N/A	5.6.2	N/A	No calibration equipment used

5.7 Control of non-conforming product					
SOI	The company shall ensure that out-of-specification product is clearly identified, labelled and quarantined.			**Y**	Procedure in place Control Of Non-Conforming Product ref 5.6.1 is in place in the form of a process flow chart Non-conforming product is documented relating to the final decision on N.C.P.1. Non-conforming product is labelled using a distinct orange label and quarantined in a segregated area, pending final decision from the Managing Director/Production Director which is recorded. The corrective action is implemented and documented to avoid recurrence e.g. extra resource provided to area where most complaints are received
	5.7.1	Y	5.7.2	Y	
	5.7.3	Y			
5.8 Foreign body contamination control					
SOI	The company shall be able to demonstrate that effective controls are in place to ensure product is protected from contamination during production and storage.			**Y**	The hazard and risk analysis has identified potential risk from physical contamination e.g. wood, jewellery, sharps, dirt, pests, hairs etc. There is a glass and plastic procedure in place ref "Glass and Brittle Plastic Control". Any breakages are recorded in an incident report form There is a procedure in place ref Knife Cutting Blades and Sharps Control. No blades were seen where they could contaminate the product, and blades are engraved with ID number and dispensing is controlled by the Production Manager. No snap off blades are used Knife Blade and Sharp Inventory ref K.B.S.I.1, there is a knife blade and sharps log to ensure control.
5.8.1 Foreign body control					
	5.8.1.1	Y	5.8.1.2	Y	
	5.8.1.3	Y			
5.8.2 Sharps Control					
	5.8.2.1	Y	5.8.2.2	Y	
	5.8.2.3	Y			
5.8.3 Chemical control					
SOI	Controls shall be in place to prevent contamination from chemical hazards.			**Y**	Cleaning chemicals, adhesives etc. used are of the appropriate grade e.g. PVA water based glue used
	5.8.3.1	Y			
6. PERSONNEL					
6.1 Training and competence				**FUNDAMENTAL**	
SOI	The company shall ensure that all employees are adequately trained, instructed and supervised commensurate with their activity and are competent to undertake their job role.			**Y**	
6.1.1	All personnel, including temporary personnel, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.			**Y**	All personnel have induction training which includes manual handling, fire drills, health and safety policy, hygiene and quality requirement training etc. The employees are also trained in specific tasks via a skills assessment which is done annually. Based on the weighting criteria they are given a percentage score for Personal profile and Skills points in an annual review which determines salary/training etc.
6.1.2	The company shall routinely review the competencies of staff and provide relevant training as appropriate. Records of training shall be maintained.			**Y**	The company uses a skills matrix and personnel are observed irrespective of how long they have been with the company. The observation is done by the Production Director where each employee is given three new targets to be met. Training records seen for P Strzelczyk (no 1 minder), A Bennett (General Factory Hand) and found to be up to date. Records are retained indefinably including of personnel who have left the company

6.2 Access and movement of personnel					
SOI	The company shall ensure that access and movement of personnel, visitors and contractors shall not compromise product safety and quality.			**Y**	There are designated walkways marked on the shop floor and products are suitably segregated. There is a plan of the site but does not correctly show access points for personnel, travel routes and staff facilities are not marked
	6.2.1	N	6.2.2	Y	
6.3 Personal hygiene					
SOI	The company's personal hygiene standards shall be documented and adopted by all personnel, including visitors to the production facility. These standards shall be developed with due regard for risk of product contamination.			**Y**	There is a jewellery policy in place ref Personal Hygiene Policy (section 1.5 Personal Belongings). Mobile phones are not permitted in production ref Personal Hygiene Policy. Eating/drinking etc. is only permitted in the canteen area. Drinking of water is permitted near equipment from spill proof containers
	6.3.1	Y	6.3.2	Y	
	6.3.3	Y	6.3.4	Y	
6.4 Protective Clothing					
SOI	The risk of product contamination from clothing, hair or personal items shall be minimised.			**Y**	Company has provided a specification on protective clothing three sets of polo shirts, t-shirts and trousers are provided. Clothing is laundered at home by employee's ref Control of Laundry section 14 of Quality Hygiene Policy. Clean and dirty clothing is controlled by operators as per company policy i.e. "clothing is to be cleaned and changed regularly to maintain hygienic standards".
	6.4.1	Y	6.4.2	Y	
	6.4.3	Y	6.4.4	N/A	No Disposable clothing used