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Re: Combined submission from NAQ Nutrition Training and Nutrition Australia – Discussion paper – Proposal P1053: Food safety management tools for the food service and closely related retail sectors

Thank-you for providing NAQ Nutrition Training and Nutrition Australia and with the opportunity to provide comment on the Discussion paper – Proposal P1053: Food safety management tools for the food service and closely related retail sectors

As a key, not for profit, community based, organisation, Nutrition Australia continues to work collaboratively with government, private and other community organisations to ensure safe food supply is achieved and maintained. NAQ Nutrition Training is a Registered Training Organisation (RTO) and sits within Nutrition Australia's Queensland division. NAQ Nutrition Training has operating as an RTO for over 10 years delivering Food Safety Supervisor Training nationally (with the exception of NSW) specifically for people and organisations catering for vulnerable populations and school settings. Training is contextualised for aged care, childcare/early years and school environments (canteens and tuckshops). Recently we have delivered training for the retail sector in the area of Food Service: RTE food prepared in advance. Our training ensures high quality training and learning that meets the needs of our students.

NAQ Nutrition Training and Nutrition Australia support the current review (of the scope and approach) and would like to offer the following recommendations and comments in response to the Discussion paper – Proposal P1053: Food safety management tools for the food service and closely related retail sectors.

Recommendation 1 – Evidence of skills and knowledge (acquired through non-competency based mandatory training) – regulated food safety training for all food handlers.

Nutrition Australia has over 20 years delivering food safety training nationally to all types of settings that provide food. We support the recommendation for mandatory training for all food handlers. Additionally, this supports guidelines from other regulatory bodies working with food businesses catering for vulnerable populations. For example, ACECQA (Australian Children's Education and Care Quality Authority) highlight food safety as a required skill and knowledge as identified in the National Quality Standard Element 2.1.2 - Health practices and procedures (*Effective illness and injury management and hygiene practices are promoted and implemented*).¹

Recommendation 2 - Evidence of skills and knowledge (acquired through mandatory training with nationally agreed competencies) — a certified FSS.

NAQ Nutrition Training and Nutrition Australia support the call for these types of retail services to have a certified Food Safety Supervisor.

Recent feedback following the delivery of our food safety supervisor training within the retail sector highlights the importance of clear, contextualized food safety training by qualified trainers that understand the needs and complexity of the industry.

Ensuring a nationally consistent approach to food safety supervisor requirements and the requirement for all specified retail food businesses to have a food safety supervisor. NAQ Nutrition Training and Nutrition Australia recommend that in addition to a requirement for food businesses to have a food safety supervisor, that the Code outline the training requirements for food safety supervisors. As a Registered Training Organisation (RTO) we have noted different training expectations and requirements for food safety supervisors between premise types and local government areas within state jurisdictions, for example in Queensland - Brisbane City Council vs Gold Coast City Council that require food businesses to have a food safety supervisor.

NAQ Nutrition Training and Nutrition Australia recommend that food businesses be required to have evidence of completion of nationally recognized competency-based training by their food safety supervisors. Requiring that food safety supervisors have undertaken training with an RTO registered with the Australian Skills Quality Authority (ASQA) has the potential to assist in ensuring that food safety supervisors receive nationally consistent, high quality training and assessment.

Clause 1.7 of the Standards for Registered Training Organisations 2015 states that “The RTO determines the support needs of individual learners and provides access to the educational and support services necessary for the individual learner to meet the requirements of the training product as specified in training packages or VET (vocational education and training) accredited courses”.² Additionally ASQA requires that the VET workforce have the appropriate skills to identify and evaluate LLN requirements.³ As an RTO who has been operating for over 10 years, we have seen the demographics of those working in the food industry (including those nominated to be Food safety supervisors within vulnerable population settings) to be increasingly linguistically diverse. This highlights the need for nationally consistent training with the appropriate mechanisms in place to ensure RTOs are equipped with the appropriate Language, Literacy and Numeracy skills met within in training.

For a student to demonstrate compliance in any nationally recognised qualification they are required to meet national requirements as set out by the Australian Skills Quality Authority (ASQA) including currency and sufficiency of evidence³. Through the introduction of mandatory Food Safety Supervisor training, this will ensure that those working as Food Safety Supervisors hold the sufficient knowledge, skills and currency of these to ensure safety of the food being provided.

NAQ Nutrition Training has concerns about the quality of some nationally recognised food safety online training options provided. It is recommended that food regulators work together with the Australian Skills Quality Authority to ensure that required units of competency incorporate the appropriate elements, performance criteria and assessment conditions. It is further recommended that food safety supervisors with learning needs such as language and literacy or those working in P1 food business sectors, be required to attend in person training rather than online training.

It is recommended that there be consistency among requirements for food safety supervisor training nationally. For example, as outlined in the discussion paper, 4 jurisdictions within Australia have additional Food Safety Supervisor Requirements compared to other jurisdictions.

Recommendation 3 – Evidence that key activities and processes are being controlled – evidence of essential control measures.

NAQ Nutrition Training and Nutrition Australia support the call for in-scope businesses to keep, and be able to demonstrate, evidence to support the management of key activities that are essential to producing and maintaining safe food.

With two Qld Health approved food safety auditors, we see first hand the improvements in food safety practices following regular food safety audits. During the audit process key risks and activities are identified and evidence is gathered to determine how well these high-risk activities are managed. Those businesses with well documented and maintained records are best able to monitor the potential hazards and detect if safety parameters are breached with the optional outcome of maintaining safe food.

Yours sincerely



Ms Sharyn Deam – CEO NAQ Nutrition Training/Executive Officer Nutrition Australia Qld (*on behalf of Nutrition Australia*)

Please forward correspondence to:

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Reference List

¹Australian Children’s Education and Care Quality Authority, *Quality Area 2 – Children’s health and safety*, viewed 20 May 2019, <https://www.acecqa.gov.au/nqf/national-quality-standard/quality-area-2-childrens-health-and-safety>.

² Australian Skills Quality Authority, *Clauses 1.7, 5.4 and 6.1 to 6.6—Supporting and informing learners; managing complaints and appeals*, viewed 23rd May, <https://www.asqa.gov.au/standards/chapter-3/clauses-1.7-5.4-and-6.1-6.6>

³ Australian Skills Quality Authority *Updates to trainer and assessor credential requirements to come into effect from April 2019* viewed 23rd May, <https://www.asqa.gov.au/news-publications/news/updates-trainer-and-assessor-credential-requirements-come-effect-april-2019>³ Australian Skills Quality Authority, *Clauses 1.8 to 1.12 – Conduct effective assessment*, viewed 20 May 2019, <https://www.asqa.gov.au/standards/chapter-4/clauses-1.8-1.12>.