

**Email sent to Karen Keeley, Director of Professional Development/SFSORB Secretary  
14 January 2021**

Dear Karen

Thank you for the opportunity to respond to the **Scottish Food Safety Officers' Registration Board consultation on a new Higher Certificate Qualification**, Higher Certificate in Food Practice, intended as a qualification for new candidates.

Several of our members with relevant experience and background have reviewed the documents you shared i.e. the draft Scheme of Practical Training for the Higher Certificate in Food Practice and the Academic Knowledge Equivalency document, and their considered collated comments are below.

Overall the documents contain a useful construct for the qualification both in terms of content and assessment. Some further specific points we would suggest should be addressed are below.

1. An awareness of food safety management systems certification standards, for example BRC, ISO 22000 or Red Tractor would be of value. An inspector might be expected to have some understanding of the requirements, content and validity of some of these standards.
2. Implications related to EU Exit might need to be considered in relation to the specific situation in Scotland.
3. (Higher Certificate outline) Page 12 Section E focuses only on food poisoning and foodborne infection resulting from pathogenic microorganisms. Incidents of food causing harm to health can also arise through failures in control of other types of hazard. For example, physical hazards such as glass or plastic fragments, chemical contamination from a cleaning chemical spill or incorrect application of plant protection products or allergen presence without clear accurate declarations would also require the same diligence of investigation, monitoring and control. Suggest reference to these other hazards is either added to this section or an equivalent section is created to address these considerations.
4. (Higher Certificate outline) Page 12 Section F. Both F1 and F2 seem to focus only on products of animal origin. There are multiple contaminants and residues issues with materials of vegetable origin, for example Aflatoxins due to mould growth in imported foodstuff, which should also be considered. These will certainly change and grow more important as world trade and transport of food raw materials increases extending origin, distance and time issues.
5. The assessment scheme is comprehensive and would need to be well planned out. Are there opportunities for holistic assessment within and indeed across the various assessment components e.g. aspects of the professional practice would be ideal to generate and gather evidence for the case studies. Perhaps additional guidance should be considered for candidates to explain how they might leverage their daily activities and experiences to create material for assessment.
6. Has the Higher Certification qualification been SCQF credit and levelled, and if so what was the outcome please? If it hasn't been SCQF credit and levelled, what would its comparative level be and why? This would facilitate clarity for candidates.

7. Have SCQF level descriptors been applied as part of the design process? This would support calibration with other types of qualification.

As an additional point, IFST accredit a range of undergraduate and post-graduate qualifications in food science and technology. See the current list of IFST accredited degree programmes <https://www.ifst.org/organisations/accreditation-schemes/accreditation-degree-courses/accredited-degree-programmes>

We would like to draw your attention to these as qualifications to allow an individual to register for the SFSORB Higher Certificate in Food Practice and commence practical training. We would be happy to provide any further information to support these listing in your Academic Knowledge Equivalency document.

Please don't hesitate to contact us if we can be of further help on this or any other aspect of professional development relating to food science and technology and the wider food sector.

Many thanks and Kind regards

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**Scientific Policy Director**

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