Advanced Certificate in Food Safety

EXEMPLAR MATERIAL

This exemplar material is intended to provide guidance to tutors and to promote consistency in the marking of assignments for the CIEH Advanced Certificate in Food Safety. It may also be used to guide candidates in preparing their assignments for this qualification. It should be used in conjunction with the marking guidelines on the Assignment Record Sheets.

The three exemplars illustrate assignment work of a quality that would achieve a credit, pass and referral grade respectively.

The subjects of the exemplars and the presentation styles should not be regarded as being prescriptive, or as indicating any preference. The exemplars illustrate only part of the written content of the assignments. Candidates are expected to cite references of sources they use in the preparation of assignments and may choose to include photographs, diagrams or other relevant material to illustrate or supplement their work if appropriate.

The distribution of marks for the assignment is worth noting. The investigation, analysis and recommendations in a food business account for 50% of the available marks and therefore should represent a significant part of the assignment.
Example of a credit grade assignment

Personal Hygiene Controls

Part 1
Principles of personal hygiene

Personal hygiene controls include all precautions taken by food handlers to protect food from contamination and reduce the risk of food poisoning and foodborne infections. Managers in charge of food premises have both legal and moral responsibility to ensure that these controls are followed at all times. Some personal hygiene controls for use in a food business are described below.

Food hygiene policy

A hygiene policy is an important part of a personal hygiene system. It helps to ensure that food handlers are aware of their responsibilities and the practices they are expected to follow.

Staff selection and screening

The recruitment of staff with the right attitude to food hygiene can help support personal hygiene measures within a food business. Managers, who have relevant experience and food hygiene training, can help to establish and maintain the necessary standards and set a good example.

Food handlers should be in good health in order to reduce the risk of their being carriers of organisms such as Salmonella. Carriers excrete the organism in their faeces and, if they do not adequately wash their hands after using the toilet, it may be present on their hands. If food handlers have skin infections, they may be infected with Staphylococcus aureus. Food can be directly contaminated with pathogens if it is handled, or indirectly contaminated if food contact surfaces or equipment are handled.

Staff who present at interview with a neat, clean and tidy appearance are more likely to respond to hygiene controls imposed in the food environment. When interviewing staff you can also check for other indicators of good personal hygiene – such as the absence of skin infections, clean hands with short unbitten fingernails, clean hair and good dental hygiene. A medical questionnaire can be used to obtain the medical history of an applicant, particularly with regard to any history of foodborne illnesses, food poisoning or persistent stomach upsets. These questionnaires should be reviewed by a manager trained in food hygiene, or by an occupational health professional.

Some employers may require faecal specimens to be submitted by prospective food handlers for checking.

Fitness to work and return to work policy

Food handlers have a legal responsibility under the Food Safety (General Food Hygiene) Regulations 1995 to report to their employer if they are suffering from or think they may be suffering from a foodborne illness, infected wounds or skin infections that could carry pathogens.

Where food handlers are returning to work following illness or overseas travel (especially to countries with a warm climate or poor sanitation standards), they should be required to complete a ‘return to work’ questionnaire before returning to food handling duties.

The Department of Health publication Food Handlers: Fitness to work recommends that food handlers be regarded as fit to return to work after illness if they have not suffered from symptoms for 48 hours after treatment has ceased.

Visitors

It is important to ensure that any visitors or contractors entering food production, storage or processing areas do not put the food at risk. All visitors should complete a health questionnaire, which should be assessed by qualified personnel before they are allowed to enter these areas. Any contractors who may be working in the food area should have appropriate training so that they can prevent contamination.
Protective clothing
All food handlers are required under the 1995 Regulations to wear suitable, clean and, where appropriate, protective clothing. The clothing required will vary according to the type of work being undertaken. For staff preparing open food, industry guidelines recommend a clean coat, tunic, uniform or similar, plus head covering (Industry Guide to Good Hygiene Practice: Catering Guide).

Hand hygiene
All food handlers should keep their fingernails short, as fingernails may harbour dirt and bacteria. Long nails, false nails and nail varnish can break off or chip and cause physical contamination.

Other areas covered in this section
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<thead>
<tr>
<th>Hand washing</th>
<th>Medical dressings</th>
<th>Jewellery and perfume</th>
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<td>Gloves</td>
<td>Smoking</td>
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Part 2
The role of management
While all food handlers have an individual responsibility for good personal hygiene, managers have an essential role in ensuring that standards are maintained.

One of the biggest challenges faced by management is to ensure that food handlers change any bad habits into good habits. This will involve proper training, supervision and monitoring by managers who set a good example.

Management qualifications
Managers of food businesses need to be qualified to an appropriate level so that they understand good practice and are able to recognise hazards, analyse practices, determine risks and implement effective control and monitoring procedures.

Policy and systems
Managers will be responsible for setting out systems and standards and informing all employees of their responsibilities with respect to hygiene. This will involve a personal hygiene policy, which may be supplemented in job specifications or objectives, setting the particular standards expected from individual staff.

Employees will also need to be made aware of any monitoring procedures, such as swabbing or faecal testing, and of their obligation to cooperate with such procedures and the consequences of failing to do so.

Managers will also be involved in setting up and implementing systems so that visitors and contractors, as well as staff, follow hygienic procedures when on the premises.

Managers need to set up procedures that will allow the reporting of illness, assess the risk of contamination occurring and establish whether the employee should be excluded from working with food. Managers will also need to monitor a suitable ‘return to work’ system to ensure that staff return to work only when they no longer pose a risk. It is good practice for managers to consult with a medical practitioner or an EHO for advice on exclusion and suitability for return to work.

Training
Chapter 10 of the 1995 Regulations 1995 states:

‘The proprietor of a food business shall ensure that all food handlers engaged in the food business are supervised and instructed and/or trained in food hygiene matters commensurate with their work activity.’

The Code of Practice on Food Hygiene Inspections (The Food Safety Act 1990, Code of Practice No. 9) states that responsibility lies with the food business to determine the level of training, instruction or supervision of a food handler, having regard to the nature of the business and the role of the food handler.
It is essential that all employees are issued with documented company rules on personal hygiene policy and that they receive training prior to commencing food handling duties. Induction training must include:

- the legal duty to report any disease or infection likely to lead to contamination of food with pathogens and the importance of complying with this requirement
- all aspects of the site’s hygiene policy
- the requirements and correct procedures for hand washing
- the wearing of protective clothing and changing procedures
- policy with regard to smoking, eating and drinking in food rooms, and the wearing of jewellery, perfumes and medical dressings
- the consequences of failure to comply with hygiene rules.

Following induction training, food handlers must receive further training appropriate to their particular work role. For example, a person working with pre-packed food will require far less detailed training than someone handling open, high-risk food.

Food handlers must be motivated to learn and to put into practice what they learn and they need to understand their own importance in the chain of events that can lead to food poisoning. The subject of personal hygiene can sometimes be difficult to approach as some employees may find it embarrassing or offensive to discuss and managers will have to respect this, while ensuring that they get the message across. Managers will also have to set up and implement systems to monitor employees to ensure that they put into practice what they have learned.

It is good practice to keep records of all staff training. While this is not a specific legal duty, written evidence of hygiene training may be important in demonstrating compliance with the law and may also be relevant in establishing a ‘due diligence’ defence.

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**Other management roles covered in this assignment:**

- **Provision of facilities**
  - a) Handwashing
  - b) Changing
  - c) Protective clothing

- **Effective monitoring**
  - a) Supervision
  - b) Visual monitoring
  - c) Specific monitoring
  - d) Competency assessment
  - e) Refresher training

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**Part 3**

**Investigation into personal hygiene controls in a food business**

**Background**

The company supplies chilled ready meals, sauces and soups to supermarkets. There are currently 80 people employed on site, including office staff.

There are well-established food safety procedures in place throughout the production process, including a full HACCP system.

**Medical screening**

There is a formal, documented, medical screening policy, which states that all employees are required to submit faecal samples and/or provide accurate health information. Refusal to comply with these requirements may result in disciplinary action.

**Pre-employment screening**

All prospective employees have to complete a health questionnaire that is signed off by an occupational health practitioner.

A check is made every month to ensure that all new employees have submitted health screening questionnaires.

Interviews for new employees are carried out by production managers or supervisors.

**Recommendations**

A brief statement on the front of the health screening questionnaire could help to emphasise its importance and underline the legal obligation to give accurate health information. It may also be wise to state the importance of giving accurate medical history again at the interview stage and give applicants a chance to discuss any relevant medical history in more detail.
As the checks on new employees are only made on a monthly basis, a new employee who has failed to submit a health questionnaire could possibly start work and present a risk to food safety for up to a month before discovery. It is recommended that checks on new employees should be made weekly.

While the managers who carry out recruitment interviews are aware of the importance of good health, their focus in interviewing may be more towards production efficiency than checking prospective employees are in good health. It is recommended that consideration be given to including a member of the Quality team on the interview panel. This would ensure that the panel take into account fitness to work as well as efficiency when selecting new staff. It would also demonstrate to potential employees the importance that is placed on personal hygiene and show that the Production and Quality teams work together to recruit an efficient workforce while ensuring that the food is produced safely.

Return to work/notification of illness

Company policy clearly states that all staff have a legal obligation to report immediately any illnesses that could present a food safety risk. Anyone returning from sickness absence or overseas travel must complete a ‘return to work’ form which is reviewed by the employee’s line manager and the Quality Manager.

The form is designed so that it will identify even to non-technical personnel if there are any problem areas. If an employee answers ‘yes’ to certain questions on the form, his/her manager will be required either to exclude the employee from working with food or to carry out a further investigation. The company medical screening policy sets out procedures for dealing with a range of specific illnesses – such as, skin conditions and eye infections, along with specific diseases such as salmonellosis, hepatitis A, E. coli O157 and enteric fever (typhoid and paratyphoid).

Recommendations

At present, the ‘return to work’ screening system is audited monthly by the Quality Manager. Only one or two people who have been absent are picked at random.

It is recommended that all employee absence is reported by line managers at the daily production meeting. Return to work could then be monitored for all staff who have been absent and a check made to ensure that a ‘return to work’ form has been completed. With the number of staff currently employed on site, this should not be too onerous.

Visitors and maintenance contractors

All visitors to site are required to complete a visitor health questionnaire before entering any area. This questionnaire is designed so that non-technical personnel can identify any issues that may give cause for concern.

All maintenance staff are required to read a leaflet setting out the rules that they must follow on site, prior to carrying out any work in food areas. Staff are supervised by managers while on site. On completion, contractors must ensure that they leave food areas and equipment in a condition that meets food hygiene standards. This is verified and signed off by the Engineering Manager and Quality Manager before the area can return to food use.

Recommendations

This system is thorough and works effectively.

General comments and recommendations on medical screening

There is no routine screening of staff. Many employees have not had their health assessed since joining the company years ago.

It is recommended that all employees have an annual health screening (faecal testing, questionnaire, etc.) to ensure that they do not develop any undetected conditions that could pose a threat to food safety. This could be supervised by an occupational health doctor.

Other areas covered in this assignment:

Training

Corrective action

Appendices

- Health screening questionnaire
- ‘Return to work’ form
- Visitor health questionnaire
- Changing procedures for high- and low-risk areas
Example of a pass grade assignment

Physical Contaminants

Introduction

Physical contamination is the presence of any object in food that makes the food harmful or objectionable.

There are two types of physical contaminant:

i. Intrinsic (part of the raw food) such as:
- leaves
- bones
- animal hair
- skin or hide
- fish scales
- fruit stones.

ii. Extrinsic (from the surroundings) such as:
- glass
- metal (e.g. jewellery, machine parts, staples)
- insects
- packaging
- wood.

The Food Safety (General Food Hygiene) Regulations 1995 require that food must not be exposed to risk of contamination.

Businesses that do not have sufficient controls in place can suffer:
- loss of reputation
- customer complaints
- loss of business
- prosecution
- closure of business.

Management systems

HACCP is a food safety management system that involves identification of hazards and specification of measures for their control. The system consists of seven principles:
1. Conduct a hazard analysis.
2. Determine Critical Control Points (CCPs).
3. Establish critical limits.
4. Set up a system to monitor control of the CCPs.
5. Establish the corrective action to be taken when monitoring indicates that a CCP is not under control.
6. Establish procedures for verification to confirm that HACCP is working efficiently.
7. Set up a documentation system to record all the above stages.

The use of a full HACCP system would be applicable in manufacturing processes, but in smaller-scale catering businesses, a simpler system of hazard analysis, based on the first part of the HACCP system, is normally used. This involves an analysis of the food production processes, identification of points where food hazards may occur, identification of which of these points are critical and setting up effective controls and monitoring procedures at the critical points.

These systems would include controls for physical contaminants. For example, a critical point in controlling physical contaminants in baked products would be sieving the flour before adding it to the other ingredients.

XYZ Catering has a hazard analysis system in place. This includes control systems for selection of suppliers, checking goods on delivery, screening raw ingredients and personal hygiene checks. There are also systems for maintenance, cleaning, pest control and dealing with any potentially contaminated food.
Control measures

Metal detectors

Metal detectors can pick up traces of stainless steel, ferrous metals, copper and aluminium in products. For products that are packed in aluminium trays, metal detectors can only be used to find ferrous metals.

Detectors should be checked regularly to ensure that they are working correctly. Their sensitivity will also need adjustment, according to the product being checked.

If any metal is found in a product, it will be necessary to investigate to determine the source of contamination and take action to prevent a recurrence.

X-ray systems

These can detect contaminants such as stones, bones, glass, steel, plastics, etc. Unlike metal detectors, the type of packaging does not affect the detection of contaminants.

Scanners

These can be used to detect for physical contamination in glass containers. They work by sending beams of light through the container onto a photo-electric cell. Contaminants will interrupt the light beam and trigger the machine to remove the bottle from the production line.

Visual inspection

It is very important that everyone involved in food production is visually alert at all times. While visual recognition of physical contamination is a very basic method of control, it can be used in most food businesses during many stages of food handling.

Visual inspection can be a very effective control in detecting physical contamination during receipt of deliveries, checking that packaging shows no sign of damage and carrying out random spot-checks by opening a sample of packaged goods to check for evidence of contamination. Food handlers should also look out for any visible contaminants when preparing food.

Managers in food businesses should ensure that all staff understand the importance of visual checks, set up and implement systems to check food on arrival, and supervise staff to make sure that they are carrying out the checks required. Staff should understand that any problems detected should be reported immediately to their supervisor.

Pest control

Pests can physically contaminate food in a number of ways, such as:
• droppings
• fur and feathers
• carcasses
• eggs and larvae
• live insects
• damage to packaging, opening food to contamination.

Food premises need to be designed to prevent and control entrance of pests and monitoring needs to be carried out on both the buildings and the raw materials. This will need to include:
• appointment of a reputable pest contractor
• training for managers and staff
• maintenance of buildings and services to prevent entrance and harbourage
• adequate refuse storage and collection
• cleaning schedules.

Records will need to be kept of pest contractor visits and any treatments carried out. Regular inspections should be made to check the condition of premises and make sure that no refuse or other harbourage is allowed to build up.

XYZ have a pest control contract with a well-respected local contractor, who is available for call-out visits, if necessary, in addition to the regular routine visits. The site manager keeps the records of visits. All windows and doors are fitted with fly screens and there are electric insect killers fitted, positioned away from food preparation areas to prevent dead insects falling into food.
Maintenance

Poorly maintained buildings and machinery can lead to problems – for example, flaking paintwork, or loose screws, bolts, etc. on machinery, which could drop into food.

Maintenance work itself can also cause contamination, such as debris, dust, grease or broken or spare parts.

There therefore needs to be scheduled maintenance work carried out to prevent buildings and machinery falling into disrepair, but this work must be properly controlled to ensure that it does not itself cause contamination of food. Managers will need to ensure that all maintenance staff understand the food safety implications of working in food areas. Maintenance work should not be carried out in areas where food is being prepared and the area must be thoroughly checked on completion before food handling can recommence, to ensure that no debris or loose parts are left. Machines should be cleaned and disinfected after maintenance.

Personal hygiene and jewellery

Food handlers can contaminate food with, for example:
- jewellery that could drop into the food
- broken nails, or chipped nail varnish
- hair
- dressings on wounds that fall into food
- buttons from clothing.

All food handlers need to be properly trained in the importance of personal hygiene and the risks they can pose to food. They need to wear clean protective over clothing – including headwear if necessary – and avoid wearing any jewellery, particularly anything with stones that could drop into food. If they need to cover a wound, they should wear washable dressings, ideally ones that can easily be seen if they do fall into the food.

Staff need to be constantly monitored by supervisors to ensure that they are adhering to the hygiene rules, as they can easily become careless or lapse into bad habits.

XYZ gives all staff induction training on the importance of personal hygiene and supplies them with overalls. Hair must be worn tied back or covered with a net. Blue coloured plasters are provided in the first aid boxes. Supervisors carry out frequent checks to ensure that food handlers wear the correct clothing and follow personal hygiene requirements.

Recommendations

Most of the systems at XYZ are appropriate for the nature of the business and seem to work successfully.

Being a business where food is handled a lot, the highest degree of risk of contamination is from the food handlers themselves. All staff receive induction training and there is quite a high level of supervision, but improvements could be made here. At present, few staff actually hold a certificate in food hygiene and putting all permanent staff through such a course would help them to understand the full implications of food hygiene. Regular refresher training would also help to remind staff of the need for hygienic practices and help to stop them falling into bad habits.

XYZ have a growing number of employees whose first language is not English. This poses the problem that, even if they go through the induction training, they may not fully understand the hygiene requirements. Supervisors then have to spend more time watching, checking and explaining to these staff why they have to follow hygiene rules. Having other employees who can speak the same language translate at the induction course does not seem to have the desired effect. To have a multi-lingual qualified hygiene trainer, with a sound knowledge of the food industry, would be ideal, although such a person may be difficult to find and finances may not support this.

Appendices

- XYZ cleaning schedule
- Training record form
- Raw goods intake form
Example of a referral grade assignment

Pest Control

What is pest control?
Pest controls are mainly about preventing pests from gaining access to food by ensuring that:
- food premises are designed, constructed and maintained properly
- the buildings and surrounding areas are clean and free from food waste
- rubbish is stored in covered bins and disposed of regularly
- fly screens are fitted to all windows and doors.

Reasons for pest control
Pests:
- carry diseases
- cause food wastage
- damage buildings and fittings
- cause food poisoning
- cause physical contamination of food
- cause customer complaints.

Pest control is a legal requirement.

Legislation
Prevention of Damage by Pests Act, 1949
Food Safety Act, 1990
Food Safety (General Food Hygiene) Regulations, 1995

Controlling pests

Rats
Rats are probably the most dangerous to human health as far as food safety and spread of disease are concerned. The rat flea can spread plague to humans. Rats also carry Weil’s disease (Leptospirosis).

There has been a large increase in the rat population, largely due to the vast amounts of food humans leave for them, both on the streets and in rubbish dumps.

Controls

Physical
- proofing of premises
- sealing brick and plaster work around pipes
- all doors must fit tightly
- traps.

Chemical
- chemical rodent baits.

Birds

Signs of bird infestation
- feathers
- bodies – dead or alive.

Reasons for control
- spread disease
- contaminate food
- block guttering with nests
- may have mite and insect infestations
- deface buildings
- roost on fire escapes and cause hazards.
Controls

Prevention
• eliminate perches
• good housekeeping
• proof windows and doors
• cover roof openings with wire mesh.

Physical
• traps
• mist netting – requires a licence
• bird scarers
• shooting.

Chemical
• narcotics may be used to make birds drowsy and allow them to be disposed of humanely – requires a licence.

Flies

Flies:
• housefly
• bluebottle
• fruit fly.

Reasons for control
• regurgitate enzymes and partly-digested food
• defecate
• carry bacteria on legs and body
• leave pupal cases, eggs and dead bodies on food.

Controls

Proofing
• strip curtains
• fly screens
• air curtains
• double doors
• self-closing doors.

Physical
• electronic fly killers
• sticky flypapers.

Chemical
• insecticides.

Cockroaches

Reasons for control
• bodies
• carry bacteria on legs and bodies.

Controls

Prevention
• eliminate harbourage
• good design
• good housekeeping.

Chemical
• treatment with residual insecticide.

Physical
• traps.
**Pharaoh’s ants**

Most ants are not known to transmit disease. The pharaoh’s ant is the exception. Pharaoh’s ants are a very big problem in large-scale premises, such as hospitals. They are very small, only 2 millimetres long, and difficult to detect. They prefer areas that are warm and humid, as are found in kitchens.

**Reasons for control**

- They can carry bacteria that they pick up from blood, sputum and faeces and also from dead pests such as cockroaches and decomposing mice that they take back to their nests.

**Controls**

- Pharaoh’s ants can only be eradicated by detecting and destroying their nest.

**Black ants**

Black ants are about 4 millimetres long and are found all over Britain. Their nests are normally found outside buildings and the insects find their way inside through cracks in walls, doors and windows.

**The role of management**

Although pests can be a big problem in the food industry, they can be successfully controlled if proper procedures are in place.

Managers must be aware of the standards required to control all pests. For example, rubbish areas should be kept clean and tidy. Any staff responsible for these areas must understand why they must keep these areas clean and also the need to report any failures in these standards and any sightings of pests. The managers will need to respond positively to any reported problems.

Managers must make sure that any pest control contract is with a reputable company. They must also produce COSHH sheets for any chemical pest control treatments used.

Pest control starts with the selection of sites for food businesses and the design and construction of the buildings. It is essential that a clean area around the buildings is included that can be kept clean and free from waste that could attract pests.

**Monitoring**

Monitoring is necessary in order to:

- confirm that standards are achieved
- ensure that food production is safe
- the law is complied with
- identify problems as they arise
- gather information so that changes can be made if necessary
- encourage staff motivation and commitment
- keep customers happy.

**Monitoring involves:**

- regular inspection of premises
- checking fly screens for damage
- checking for signs of pests
- checking stored food
- checking cleaning records
- stock rotation.

**Documentation:**

- cleaning schedules
- pest control contractor reports
- records of inspections.

**Training**

Managers must ensure that staff receive adequate training. The benefits of training include:

- making sure food is safe
- ensuring good quality and reducing waste
- reducing complaints
increasing job satisfaction
complying with the law
promoting a good image.

Training records should be kept.

**Pest control in a contract catering business**

The pest control book is kept in the main kitchen. There is a group contract with a pest control company who visit eight times a year.

**Control measures**

- weekly inspection by the chef manager
- all food deliveries checked for signs of infestations before storage
- all spillages cleaned up immediately
- food stored in covered containers
- all refuse bags must be placed directly into bulk containers and not left on the ground
- refuse must be kept in bins with close-fitting lids
- all external windows and doors to be proofed against insects.

**Reporting pests**

- any signs of pests must be reported to management immediately
- pest contractor to be informed and visit site within 24 hours
- pest control report book must be kept up to date
- any food thought to be infested must be disposed of.

**Comments on the pest control system**

Pest sightings are dealt with quickly and efficiently. There have been sightings of rats around the rubbish bins in the past and it was found that bin bags were being left beside the bins. The area is now cleaned daily and an evening check made to see that no rubbish is left out in bags. An additional rubbish collection each week has also been introduced.

Any problems with the pest control contractor are reported to head office. This is then passed on to the contractors so that improvements can be made.

It would be a good idea if at least one of the pest control visits each year was carried out at night, as some pests are nocturnal.

Although all staff receive training on signs of pests as part of their induction, regular refresher training would be useful.

**Appendices**

- Pest reporting procedure
- Pest contractor treatment report
Exemplar A – Credit grade

This assignment gives a comprehensive range of examples of personal hygiene controls and discusses in depth the role of management in implementing and monitoring the controls. The candidate has evidently read around the subject and carried out relevant background research and demonstrates an ability to apply an understanding of food safety theory to practice.

The investigation in the food business is thorough and wide-ranging, with detailed analysis and recommendations.

Exemplar B – Pass grade

This assignment gives a good overview of the sources of physical contamination in food and shows a good understanding of the principal methods of control. The role of management is covered quite well, but there could be more detail given on this.

There is some evidence of background reading and research, but more discussion of legal requirements and the application of food safety theory in practice would improve the assignment.

The investigation and analysis of the systems in the food business could be more in depth. The recommendations for improvement are the weakest area of the assignment – although some useful suggestions are made, these could be far more comprehensive and detailed.

Exemplar C – Referral grade

This assignment has a logical structure and gives some basic descriptions of pests and means of control. However, some important pests, such as mice and stored product pests, are omitted and the focus is not always on food safety. The information is rather thin and indicators of infestation are given only for birds. More detail is needed to reach the standard required for a pass grade.

Although the relevant legislation is named, there also needs to be some explanation of what the legal requirements are and how these can be complied with in practice.

The report on the food business is sketchy and needs much more in-depth analysis and more detailed recommendations, particularly as this represents 50% of the assignment marks.

The emphasis of the assignment overall needs to be on describing and discussing the application and management of control measures, rather than simply on listing facts.
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