

## FOOD SAFETY POLICY

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## 1. Purpose and Context

The health, safety and wellbeing of our staff, students and visitors is vitally important to us. To achieve this the University recognises the risk that unsafe food presents to consumers' health and is therefore committed to managing food safety effectively and achieving high standards of food hygiene.

## 2. Scope

This policy applies to all catering activities undertaken by, or on behalf of the University; this includes, but is not limited to:

- In-house catering services operated by the Estates and Facilities
- Events involving catering organised by a University School or Service.
- Third-party catering providers arranged by the University, for example, contract caterers, food vendors, ice cream vans, mobile food traders or food delivery companies

This policy does not apply to:

- Food that is brought onto the University premises for consumption by individuals
- Feeding arrangements for off-campus activities, such as meals provided during field trips, research activities and business travel
- Food operations undertaken by the Students' Union (SU) or SU Sports clubs or societies.

## 3. Principal Aims

The principal aims of this policy are to achieve high standards of food safety by ensuring:

- All food delivered to, or supplied by, the University is prepared, processed, manufactured, packaged, stored, transported, distributed, handled, provided, or sold in accordance with applicable food safety legislation
- The University's Catering Services Team is registered with Kirklees Council
- All third-party catering providers using the University's premises are registered and approved by the University for their undertaking
- All food business operators have implemented an appropriate and adequate food safety management system and controls commensurate with the type of provision to ensure food safety standards are met and maintained.
- Alcohol is sold or supplied responsibly and in accordance with relevant licensing laws.

In addition to the principal aims, this policy, through the food safety arrangements specified, supports the University finance policies and guidance through the application of The University Financial Regulations and Procurement Handbook, This will ensure that we appoint third-party caterers who are suitably competent and can deliver goods and services consistently to our quality, safety, financial and technical requirements to ensure we mitigate risk and deliver value for money.

## 4. Regulatory Background

The main legislation governing the sale of food and food hygiene is:

- The Food Safety Act
- Regulation (EC) No 178/2002 laying down the general principles of food law and procedures in matters of food safety
- The Licensing Act
- The Food Safety (General Food Hygiene) Regulations 1995
- Regulation (EC) No 853/2004 laying down the specific hygiene rules for food of animal origin
- The Food Safety and Hygiene (England) Regulations 2013
- The Food Information Regulations

## 5. Responsibilities

### 5.1 The Estates and Facilities Service

**Will:**

- Ensure adequate resources are in place for the management of food safety
- Have responsibility for the implementation of this policy
- Ensure that:
  - Legislation governing the sale of food and food hygiene is being met
  - Suitable management systems are in place to identify, evaluate and control hazards that are significant for food safety
  - The University catering Service is registered with Kirklees Council
  - All third-party catering providers are registered and approved by the University for their undertaking
  - Those with responsibilities for food safety and hygiene are trained and competent
  - Suitable systems are in place for monitoring controls and verifying that the food safety management system is effectively implemented and maintained
  - Emergency procedures are in place as required
  - Significant incidents or enforcement actions are appropriately investigated via the University's Incident Reporting System
- Be the primary point of contact and liaison for Kirklees Council's Environmental Health Department
- Ensure that recommendations for best practices or remedial actions are implemented following any significant incident, non-conformity, or enforcement action.

### 5.2 The University's Catering Services Team

**Will:**

- Provide competent advice and support on food safety to the University
- Be the first-choice provider to cater for events
- Where the use of third-party caterers is required, the University's Catering Service will provide a list of approved suppliers
- Comply with all policies, arrangements, and guidance
- Implement suitable and sufficient arrangements to control food hazards within their area of responsibility
- Ensure food handlers are provided with the information, instruction, training, and supervision necessary to ensure they are trained and competent to conduct their tasks

- Ensure food handlers follow good personal hygiene practices
- Ensure monitoring and inspection activities are conducted and any remedial actions implemented within their area of responsibility
- Ensure records of monitoring, audits and inspections are maintained
- Be the point of contact to assist Environmental Health Officers in undertaking routine inspections and investigations, providing information and records as requested and answering any questions
- Ensure that recommendations for best practice and remedial actions are implemented following an incident investigation or inspection by Kirklees Council Environmental Health department
- Ensure that food incidents are reported via the University's incident reporting system
- Ensure that all incidents are appropriately investigated, and remedial actions implemented
- Where a food poisoning outbreak is suspected, suspend food service pending implementation of appropriate action.

### **5.3 Food Handlers**

#### **Will:**

- Adhere to all policies, arrangements and guidance issued by the University
- Follow reasonable instructions and take note of all information provided
- Attend food safety training
- Work with due care and attention
- Follow good personal hygiene practices
- Report to their manager/supervisor any matters likely to constitute a risk to food safety

### **6. Food Safety Arrangements**

This policy covers safe and effective food safety management across all University catering activities.

The University's Catering Service will develop, implement and maintain a food safety management system based on the principles of Hazard Analysis at Critical Control Points (HACCP). This system will be applied in all areas, inclusive of kitchens, catering outlets and delivered hospitality.

A University School or Service undertaking one or more of the food related activities listed below will be required to adhere to this policy:

- Preparation
- Processing
- Manufacture
- Packaging
- Storage
- Transportation
- Distribution
- Handling
- Supply or Sale

## **6.1 General hygiene requirements**

The University's Catering Service as well as Schools and Services that conduct any stage of production, processing and distribution of food under their control shall comply with the general hygiene requirements laid out in ANNEX II of Regulation (EC) No 852/2004. Which specifies the requirements governing:

- Layout, design and construction of food premises
- Provision of sanitary facilities
- Design and construction of equipment
- Maintenance of premises and equipment
- Transportation of foodstuffs
- Cleansing and disinfection of food premises and equipment
- Food waste
- Pest Control
- The delivery and handling of raw materials and ingredients
- Food storage
- Temperature controls during storage, cooking, processing, cooling, reheating, thawing, preparation and distribution.
- Protection, covering and packaging of food
- Personal hygiene
- Training and education of food handlers (details of training providers can be obtained from the Catering Management Team)
- Work with due care and attention

Appendix 1 details further information regarding good hygiene practices.

## **6.2 Hazard Analysis at Critical Control Points (HACCP)**

The University's Catering Service shall implement and maintain a food safety management system based on HACCP principles, which identifies, evaluates and controls hazards which are significant for food safety.

The food safety management system will be developed, implemented and maintained in accordance with the following seven HACCP principals:

1. Conduct a hazard analysis
2. Determine the critical control points (CCPs)
3. Establish critical limits
4. Establish a system to monitor control of the CCP
5. Establish corrective action to be taken when monitoring indicates that a particular CCP is not under control
6. Establish verification procedures to confirm that HACCP is working effectively
7. Establish documentation and records concerning all procedures appropriate to these principles and their application

## **6.3 Managing food allergens**

It is important to manage allergens effectively when providing catering to ensure that food is safe for customers with food allergies.

Under the Food Information Regulations catering businesses are obliged to provide information regarding the 14 specified allergens to our customers and to ensure that foods produced on site that are prepacked for sale have ingredients emphasised allergens clearly labelled.

Allergen information can be supplied in a number of ways for non-prepackaged foods. If the information is not visible it must be clear that the information can be obtained by: asking a member of staff, by

means of a notice, a statement on the menu or label that can be seen by customers.

The 14 foods/food groups that must be labelled are:

- Celery and celeriac
- Cereals containing gluten (found in wheat, barley, rye, spelt and kamut)
- Crustaceans
- Eggs
- Fish
- Lupin
- Milk
- Molluscs
- Mustard
- Tree nuts
- Peanuts
- Sesame
- Soya
- Sulphur dioxide

General good practice in relation to the management of allergens:

- Know the ingredients in each of your recipes and understand your supply chain
- Ensure all allergen information is up to date, clear and easy to understand
- Have a clear process for dealing with customer orders and the training/supervision of food handlers
- Operate clear kitchen protocols, check and audits and ensure that the risk of cross contamination is controlled at all stages of food receipt, storage, preparation and service
- Ensure cleaning is effective and consistent

Further information regarding the management of allergens can be found on the Food Standards Agency website and by requesting a copy of the Estates and Facilities EHSGN-37 Food Allergy Procedure via the University's inhouse catering management team.

#### **6.4 Food business registration**

Where approval is granted for a new catering provision, the University's Catering Service, or the third-party provider, shall register the food business with Kirklees Council at least 28 days before opening. If the provision is operated on more than one premise, each of the premises under the owner's control should be registered separately.

The University's Catering Service or any third-party caterers operating on University premises must notify Kirklees Council of any significant changes in activity and closure of existing premises. Premises used to supply, sell, or provide food on an occasional and small-scale basis at a community or charity event may be exempt from registration. The University's event organiser is responsible for contacting Kirklees Council to determine if the food event(s) is exempt.

## 6.5 Principles governing the provision of catering for events

The fundamental principles governing the provision of catering for events on the University campus are:

- The University's Catering Service must be contacted by the University event organiser when catering is required. The catering management team will assess whether they can provide the catering or whether this should be directed to a third-party catering provider.
- Third party caterers should only be considered when the University Catering Service cannot fulfil the specific request. Before appointing a third-party caterer, authorisation must be sought from the University's Catering Service and steps must be taken to ensure the provider has appropriate arrangements for food and health and safety. Please refer to Appendix 2.
- Where a School or Service choose self-catering for the provision of food for an event the organiser must refer the Food Standards Agency website <https://www.food.gov.uk/> for guidance and requirements for permissible foods.
- If the provision and/or service of alcohol is proposed for an event prior permission should be sought from the Vice-Chancellor's Office and the license holder. If the provision and/or service of alcohol at an event is approved the following must be adhered to:
  - A range of non-alcoholic beverages must be available
  - The alcohol is only served/consumed in the agreed space
  - The alcohol is provided by the University Catering Service
  - The individuals serving drinks must be over 18 and also adhere to the Challenge 25 policy which outlines that anyone that appears to be 25 or under needs to provide ID to prove that they are over 18.
  - The event organiser or nominated individual must ensure that alcohol is consumed responsibly.

## 6.6 Training, competence and supervision

The catering provider shall ensure that food handlers are trained in food hygiene matters commensurate with their work activity. Training should be provided in line with the training matrix below.

<b>Training</b>	<b>Required by those who:</b>	<b>Within/frequency</b>
Food Safety Induction	All food handlers	Before commencing work
Level 2. Food Safety	Prepare, process or handle high-risk foods	Before commencing work
Level 3: Food Safety	Supervise or manage food preparation, processing and handling activities	Within 12 months of employment
Level 4. Food Safety	Are involved in developing and maintaining the Food Safety Management System and applying the HACCP principles	Within 12 months of employment
Food Safety refresher training	Prepare, process or handle high-risk foods	Bi-annually

If in doubt regarding training requirements for a specific event advice must be sought from the Catering Management Team.

## 6.7 Monitoring and inspection

In accordance with the HACCP principles, the inhouse University Catering Service should establish the following:

- A system to monitor control of the CCPs (HACCP principle 4)
- An audit programme to verify compliance (HACCP principle 6)
- Documentation and records concerning monitoring, audit, inspection procedures (HACCP principle 7)

## 6.8 Monitoring Critical Control Points (CCPs)

Monitoring is the act of conducting a planned sequence of observations or measurements to assess whether a CCP is under control, thereby identifying loss of control and providing information to allow corrective action to be taken promptly.

All catering operations delivered by the inhouse University Catering Service shall implement a monitoring system to check control measures at CCPs and confirm that the process is under control and critical limits are not breached. The monitoring system should state the following:

- What the critical limits and target levels are
- How the monitoring should be undertaken
- When the monitoring should be conducted
- Who is responsible for monitoring
- How and where the monitoring data should be recorded.

## 6.9 Audits to verify compliance

Systematic and planned audits verify compliance with the food safety management system. The University Catering Service should conduct audits at planned intervals to determine whether the food safety management system is effectively implemented and maintained. The frequency of audits should ensure confidence in the food safety management system to provide safe food. Therefore, the nature of safety hazards and risks to the consumer should be used to determine the frequency and format of audits.

In addition, a joint audit of the University's Catering Service will take place annually, undertaken by the Office of Health and Safety Internal Auditor, Catering Services Manager and Head Chef.

## 6.10 Food hygiene inspection and ratings

Kirklees Council's Environmental Health Department are responsible for enforcing food hygiene laws and will routinely inspect a food business and rate the hygiene standards found during the inspection. For further information on what to expect during a food hygiene inspection, refer to Appendix 3.

The University aims to attain and uphold 5-star food hygiene ratings for each food business operated by or on behalf of the University.

## 7. Emergency procedures

**If it is suspected that an individual is having an episode of anaphylactic shock immediate medical assistance should be sought, dial 999 and state anaphylactic shock to the call handler.**

Further guidance on First Aid can be found at [First aid - University of Huddersfield](#)

A high standard of food safety and hygiene should ensure food is safe to eat and prevent an outbreak of food poisoning. It is considered a food poisoning outbreak when two or more people thought to have had a common exposure to food; experience a similar illness or confirmed infection.



Immediately upon becoming aware of a suspected food poisoning incident, the notified person should:

- If the casualty is on site arrange for a first aider to attend, if appropriate
- Notify the person responsible for the catering provided (ie. The inhouse University Catering Management Team, the School or Service providing catering or the Third Party Caterer)

The person responsible for the provision of the catering must then:

- Make enquiries to find out which food or meals were implicated
- Stop serving food and suspend all food operations from the food premises concerned (until the any outbreak is confirmed or ruled out and proportionate precautions taken)
- Retain any remaining food and its original packaging that may be needed to trace the causative agent
- Notify the University's Office of Health and Safety via the incident reporting system
- Liaise with the University's Office of Health and Safety and/or the University's inhouse Catering Management Team to determine whether there is a requirement to report the incident to Kirklees Council's Environment Health Department.
- Do not clean the premises until bacteriological specimens have been collected if deemed necessary by Environmental Health Officers from Kirklees Council
- Prepare a relevant menu list and, as far as possible, details of food processing (when purchased, storage temperature, method of cooking, cooling, reheating, or processing and HACCP monitoring records)
- If possible, make a complete list of people who consumed the suspected food, including their contact details
- Prepare a list of food handlers and other staff, especially those involved with the suspect food. Absent staff should be included, and the reason for the absence should be noted
- Prepare a list of suppliers and details of the ingredients purchased, dates delivered and delivery records
- Provide all information and records requested by Environmental Health during their investigation and follow their instruction and guidance
- Analyse the results of the Environmental Health investigations and implement any remedial actions.

All food incidents, must be reported through the University's online incident reporting system [IMS-Report Incident \(hud.ac.uk\)](https://hud.ac.uk/ims-report-incident) and investigated by the catering management team or responsible person if the catering provision was sourced independently of the University catering Service.

The objectives of the investigation are:

- Determine if the injury or illness is linked to food delivered to or supplied by the University
- Identify the location of the outbreak (premises where contaminated food was prepared or served)
- Identify the food eaten which gave rise to the injury or illness
- Identify the causative agent
- Trace cases and carriers, especially food handlers
- Trace the source of the causative agent
- Determine how the food became contaminated and what stage of food preparation allowed bacterial multiplication
- Recommend how food should be prepared in the future to prevent a recurrence
- Provide evidence in the event of legal action.

## Appendix 1 - Good Hygiene Practices

### Food preparation areas

- Premises should be kept clean and maintained in good repair and condition
- Appropriate facilities must be available to maintain adequate personal hygiene, including facilities for the washing and drying of hands, hygienic sanitary arrangements and changing facilities
- Floors and walls must be clean and in a good state of repair
- Ceilings should be in good condition and free from condensation, flaking paint or plaster
- Surfaces and equipment in contact with food must be maintained in good condition, easy to clean, and disinfected where necessary
- An adequate supply of hot and cold potable water is to be available
- Adequate provision is to be made for the cleaning and, where necessary, disinfecting of utensils, crockery, and equipment
- Where foodstuffs require washing during preparation, adequate provision must be made for this to be done hygienically
- Pet animals and pests must be prevented from entering food preparation areas
- Adequate facilities for storing and disposing of food waste must be available
- Food waste and other rubbish must be removed from rooms containing food frequently to prevent it from building up and attracting pests.

### Personal hygiene of food handlers

- Hands must be washed regularly and frequently, particularly after visiting a toilet, before commencing the preparation of food and during the handling of food
- Hands should be washed using warm running water and liquid soap and dried using a paper Towel
- Fingernails should be kept clean and short, and nail varnish or false nails should not be worn
- Hair should be clean and long hair should be tied back. Hair should never be scratched or touched while preparing food
- Smoking and vaping must never take place near food preparation areas
- Clothing should be clean and made from materials that do not give rise to physical food contamination, for example, woollen fibres and loose buttons
- Ornate jewellery and wristwatches should be removed before preparing food
- Cuts and grazes should be covered with a blue waterproof dressing
- Personnel suffering from food poisoning, diarrhoea, vomiting, nausea, discharge from the ears, eyes, or nose, cold or flu-like symptoms, sores, boils, or septic lesions should be excluded from handling food until 48 hours after symptoms have subsided.

### Food preparation

- Wipe up food spillages straight away
- Clean and disinfect work surfaces, utensils, and equipment before preparing food and between tasks, for example, after preparing raw food and before preparing ready-to-eat food.

### Ingredients

- Make sure ingredients are of good quality
- Check date labels before using food. Do not use food past its 'use-by' or 'best-before' date
- Wash fresh fruit and vegetables before use.

### Safe storage

- Store raw and ready-to-eat foods separately

- Keep food covered
- Store food in clean, airtight, food-grade containers
- If re-using glass jars to store jams and preserves, ensure they are free from chips and cracks and thoroughly washed and sterilised before use.

### **Labelling and allergens**

Unless undertaken by a registered food business, the occasional (less than once a month) handling, preparation, storage and serving of low-risk foods are exempt from the Food Information Regulations. However, the university considers it best practice to:

- Label the food with the product name and a list of ingredients with the allergenic ingredients emphasised in bold.

### **Further information**

For further guidance regarding food safety, hygiene, labelling and allergens, refer to the Food Standards Agency website.

## Appendix 2 - Procedure for the appointment of a third-party caterer

A School, Service or Student Body wishing to organise an event involving the supply or sale of food and/or drinks should contact the University Catering Service to discuss the requirements. The University's Catering Service will assist with planning and pricing the bespoke elements of catering for an event. If the in-house catering service cannot fulfil the catering requirements, the university will recommend a third-party catering provider.

If the requirements cannot be provided in-house or through a preferred partner, permission will be given for the appointment of a third-party catering provider. If payment is to be made to the third party for the provision of catering services the company will need to be added as a new customer on the Unit 4 finance system.

If permission is granted, the School/Service should complete the third-party caterer questionnaire in collaboration with the potential catering provider and submit the completed form to the University Catering Service before procuring the services of the named catering provider.

Approval will only be granted if the third-party caterer:

- Has registered as a food business with the appropriate local authority
- Has been inspected by the Environmental Health Authority within the past three years
- Has been awarded a five-star hygiene rating at the last inspection
- Has suitable public liability, products liability and employers liability insurance cover
- Has a documented food safety management system based on the principles of HACCP
- Has trained all food handlers to at least food safety level 2
- Maintains equipment, gas and electrical installations in safe working order and undertakes regulatory inspection and testing.
- Provide any required risk assessments and method statements

The sale of alcohol by third party caterers is not permitted on campus.

## Appendix 3 - What to expect during a food safety inspection

Kirklees Council Environmental Health Department are responsible for enforcing food hygiene laws and can inspect a food business at any point. Authorised enforcement officers will periodically conduct routine food hygiene and safety inspections to check if the food business complies with food laws and produces safe food.

Authorised officers have the right to enter and inspect the premises at any reasonable time and will usually arrive without prior notice.

The frequency of food hygiene and safety inspections will depend on the: type of business, nature of the food, degree of food handling, size of business and previous standards of hygiene and will range from 6 months to 3 years.

At the inspection, the officer will check the following three elements:

- How hygienically the food is handled during storage, cooking, processing, cooling, reheating, thawing, preparation, and distribution
- The physical condition of the premises includes layout, lighting, ventilation, sanitation, staff facilities, waste management and pest control
- How the business manages ways of keeping food safe, looking at processes, training, and systems to ensure good hygiene is maintained.

If contraventions of food hygiene legislation and/or unsafe food handling practices are identified during an inspection, the authorised officer can take enforcement action, which can include:

- Verbal advice/warnings or informal written advice/warnings where the officer is confident remedial action will be taken
- Hygiene improvement notices for contravention of food hygiene legislation, allowing no less than 14 days to comply
- Hygiene prohibition notices, where there is an imminent risk of injury to health, requiring the closure of the premises or prohibition of processes or use of equipment
- Formal caution or prosecution if an offence exists.

Officers will provide verbal feedback at the time of inspection and will follow up with a report to outline the following

- Hazards identified by the inspector but not adequately controlled
- Failures to implement or monitor CCPs
- Contraventions of food hygiene legislation
- Recommendation of best practice
- The timescale for remedial action
- Follow-up action the officer intends to take
- Food Hygiene Rating

### Food Hygiene Rating

Kirklees Council will rate the hygiene standards found during the inspection on a scale of 0 to 5:

0. Urgent improvement is required
1. Major improvement is necessary
2. Some improvement is necessary
3. Hygiene standards are generally satisfactory
4. Hygiene standards are good
5. Hygiene standards are very good.

After an inspection, the rating will be published by the local Food Standards Agency on the Food Hygiene Ratings website, so customers can check the rating and make informed choices about where to buy and eat food.

Additionally, Kirklees Council will provide window stickers for display on the premises.

Display of the rating sticker is voluntary in England, but it is University policy that rating stickers be displayed visibly to customers upon entry to the food premises.

Food businesses that are low risk to public health, for example, tuck shops selling pre-wrapped goods that do not require refrigeration, may be inspected by but are exempt from being given a food hygiene rating.

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