

Food Safety Series

University of Cambridge
Food Safety Policy
2019

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1. Food Safety Policy Statement

- 1.1 The University of Cambridge is committed to providing safe food of good quality through maintaining the highest standards of food safety and providing guidance and instruction on the University's requirements to all those involved in meeting these objectives. This is necessary to satisfy both the applicable legislation, best industry practices and minimise any risk of incidents or infection transmission by food.
- 1.2 It is to be recognised the risk of spreading food borne infection through food cannot be entirely eliminated but this policy is directed not only at minimising the risk of incident but also ensuring appropriate procedures are in place to minimise the onward spread of infection or risk of future incidents.
- 1.3 It is the policy of the University to maintain higher standards than those required by law and ensure risks of food poisoning are reduced to acceptable incident levels.
- 1.4 In many cases, catering facilities are operated by the University Catering Service and the provision of food is managed by the department itself. Alternatively catering provision is normally contracted to persons or businesses that are not directly employed by the University. These contracted persons or businesses are required by the University to maintain standards comparable to those operated by the University Catering Service and not just meet minimum legal requirements. Where necessary additional steps will be taken to ensure risks are reduced to a safe low level and not simply meet minimum standards as defined by food safety laws. Contracted catering providers must also meet these more exacting requirements.
- 1.5 It is the policy of the University, where reasonably practicable, to minimise risks through premises and menu / food offer design rather than rely on management procedures as the primary control. Inherently management controls are subject to greater risks of human error that should be avoided.
- 1.6 Whilst the University recognises and emphasises the importance of documenting processes and critical stages in food preparation and service, this is not a substitute to avoiding or minimising food hazards and is secondary.
- 1.7 Departments must use the University Catering Service or one of the preferred suppliers listed with Procurement Services, except in the provision of solely low risk food or drink. The University subject preferred suppliers to auditing of their controls in order to reduce risks of any incident. As a result non-preferred suppliers present an unknown level of risk that is potentially greater. Should a Department wish to use a non-preferred supplier for hospitality or delivered platters, they must provide justification in writing to the Chair of the Health & Safety Executive Committee. This justification must also include details of the measures put in place to ensure that the catering provider is a reputable supplier and that they comply with this Food Safety Policy. The decision as to whether the supplier can be used is final and rests with the Chair of the Health & Safety Executive Committee.

1.8 Departments requiring catering from a specialist supplier for specific dietary requirements e.g. strict kosher, caterers in other parts of the country or abroad should contact the Head of University Catering Operations for guidance.

1.9 It is recognised that the processes involved in the maintenance of high standards of food hygiene and food control operate in tandem to maintaining high standards of food quality.

Chair of the Health & Safety Executive Committee

2. Policy Objectives

2.1 The objectives of this policy are to:

- Ensure that all food supplied or delivered within and by the University is produced, stored, handled and transported in accordance with relevant legislative requirements.
- Ensure that all catering providers using University premises are registered with and approved by the University.
- Ensure that all premises used by catering providers for the preparation of food are registered with the appropriate Local Authority and maintain high standards of food safety.
- Ensure that all food providers have appropriate premises and equipment to enable safe preparation, cooking, handling, storage and transportation of the foods they provide and in a manner that reduces those risks to acceptable levels.
- Ensure that all food providers have appropriate and adequate food safety management systems and controls in place, commensurate with the type of food provision in operation. Further those systems are fully implemented and maintained.
- Ensure that all risks associated with food provision are reduced to a tolerable level, do not cause harm to the consumer and maintain the standards of quality such as freshness and palatability demanded by the University.
- Ensure that all food handlers, their managers and business operators have the necessary competence to undertake their duties in accordance with the requirements of this policy.

3. Who Does this Policy Apply To?

3.1 This policy applies to any individual, group, company or other body supplying catering services or any other service relating to food and drink on University premises. It therefore applies to:

- The University Catering Service
- Any other commercial operators and suppliers on University property, including preferred suppliers
- Departments, clubs or individuals which provide food for departmental, social or charitable events

3.2 This policy does not apply to staff or students that bring or prepare food for their own personal consumption (e.g. your own lunch in a tea-room) or where no offer or sale of food is intended. Note, provision of food to others without charge, as a gift or otherwise is not exempt from the food safety laws nor this policy. However, food safety advice is given in guidance leaflets.

4. Breach of Policy

4.1 In the event of any individual, group, company or other body supplying catering services or any other service relating to food and drink on University premises failing to comply with any of the major elements of this Policy (as determined by the Health & Safety Executive Committee*), the Health & Safety Executive Committee reserves the right to instruct the catering provider to cease activity immediately**. The catering services provider should contact the Head of University Catering Operations for guidance as to the actions necessary to ensure compliance. Once the necessary actions have been undertaken, the Head of University Catering Operations will write to the chair of the Health & Safety Executive Committee seeking approval for the recommencement of the service.

*Any breach of food safety laws as set down in EU Directives, the Food Safety Act 1990 or UK Regulations is capable of constituting a 'major element'. **Under these circumstances, the University will not be liable for any compensation to the Catering Provider or other parties affected by this action.

5. Roles and Responsibilities

5.1 *The Health & Safety Executive Committee*

The Health & Safety Executive Committee approves this policy and receives reports of significant findings of food safety audits or investigations of food poisoning complaints. The Committee also has the right to instruct the catering provider to cease activity immediately where there is a failure to comply with requirements of this policy.

5.2 *Director of Health, Safety & Regulated Facilities*

The Director of Health, Safety and Regulated Facilities will ensure that significant findings of food safety audits or investigations into claims of food poisoning incidents are reported to the Health & Safety Executive Committee.

5.3 *The Head of University Catering Operations*

The Head of University Catering Operations develops and revises the Food Safety Policy for approval by the Health & Safety Executive Committee. The Head of University Catering Operations is also responsible for audits of all catering providers against the University standards and provides food safety advice to departments, students, suppliers, event organisers, complainants of failed food safety or alleged food poisoning and, where appropriate, tenants. Food outlets are to be monitored and audited by the Head of University Catering Operations to ensure compliance with this policy and legislative requirements.

5.4 *Procurement Services*

Procurement Services ensure that all catering services contracts contain food safety criteria that conform to this policy. External suppliers used for University events are also monitored by Procurement Services to ensure the requirements set out in this policy regarding Food Safety Registration are met. Procurement Services also ensure that permission is received from the Health and Safety Executive Committee for

Departments seeking exemption from part or all of this Policy for the purposes of tendering embedded catering operations within the department or for the use of a non-preferred hospitality provision.

5.5 Occupational Health

Occupational Health provides medical guidance on occupational health issues including fitness to work with food of directly employed personnel. All preferred catering supplies are required to meet the Food Standards Agency 'fitness for work' requirements for food handlers.

5.6 University-Owned Premises Occupied by Other Organisations

For food premises owned by the University of Cambridge but not managed by them, the University leasing agreement will state the responsibilities of both parties with regard to structural and fixed equipment. However the day-to-day operation is the responsibility of the occupier and must at all times comply with Legislation and this Policy. Failure to comply may result in the termination of the lease forthwith on receipt of written notice.

5.7 Food Premises Registration

All food businesses (University food outlets and food suppliers) must be registered with the appropriate food safety enforcing authority - this will usually be the local authority within which the premises fall. Once registered, the management of the Food Area and all parts of the premises used as part of the food business is responsible for notifying the enforcing authority of any significant change in activities and / or operation including of closure.

5.8 In the event of doubt as to whether an activity needs to register, for example a charity event or where infrequent, advice of the local authority should be sought as to the need to register the activity. *Responsibilities in Food Areas*

The management arrangements for implementing the University's Food Safety Policy are as follows:

5.9 *Estate Management* – are responsible for ensuring that this policy is implemented in those areas for which they have control i.e. the University Centre and other operations managed by the University Catering service.

5.10 *Other Areas* – e.g. catering outlets run by departments. A responsible person must be appointed e.g. Facilities Manager. They report to the respective Head of Department who is responsible for the activities of their Department.

6. Food Safety Standard

- 6.1 All operators will comply with all current and relevant food safety, compositional, quality and food information legislation.
- 6.2 The operator will be expected to maintain high standards of cleanliness of the catering areas and equipment at all times. The operator will also comply with all requests from the Authorised University Officers and the Local Environmental Health Department. All correspondence from the Local Environmental Health Department, including reports following inspection of the facilities will be copied to the Head of University Catering Operations and actioned in accordance with any stated requirements.
- 6.3 The operator will operate a Food Safety Management System (FSMS) based on HACCP principles. The FSMS shall be bespoke to the premises. All paperwork pertaining to health & safety and food safety will be retained at the catering facility and made available to the University forthwith upon written request and the operator may be required to attend Food Safety Meetings on specific issues.
- 6.4 The manager / supervisor responsible at the catering facility for the operation is to possess a Level 3 Certificate in Food Hygiene, all other catering staff to possess at least Level 2 Certificate in Food Hygiene unless within the first 3 months of employment and under close supervision and instruction of someone who has attained such qualifications. Copies of such certificates should be given to the University. These certificates must be of a recognised standard of competency as recognised by the Qualifications and Curriculum Authority, based on classroom led training. All catering staff involved in the handling of food must have received training in the relevant parts of the Food Safety Management System in operation for the premises, commensurate with their responsibilities.
- 6.5 All external contractors must be registered with the University and in accordance with all relevant University procedures in order to operate catering facilities within any University premises or supply where they supply hospitality to the University. Contractors who are not registered must agree to be audited by representatives of the Head of University Catering Operations. Auditing may include a variety of stages including examination of documented procedures, inspecting premises used for food preparation and storage, completing questionnaires, questioning of employees and food sampling. The Registration provided, subject to satisfactory auditing is valid for a period of 3 years for hospitality services commencing at the start of the contract to operate a catering facility within the University. It is then normally renewed every three years. This will be carried out by third party food safety experts appointed by the University with a fee payable by the contractor to cover those costs.

7. Food Safety Training

- 7.1 Each Catering Provider is required to draw up a food safety training plan (FSTP) to comply with this Policy. This plan is to be forwarded to the Head of University Catering Operations to enable checking of adequacy. The owner of the business must ensure their personnel are trained appropriately to a level equivalent to QCA regulations. Classroom style training is preferred and where this is not undertaken the Catering Provider must demonstrate how learning and comprehension is checked.
- 7.2 It is a requirement of the Policy that all Food Handlers, including casual staff and temporary staff, comply with the following training programme: Induction training in food hygiene must be received before commencing work for the first time.
- 7.3 A Level 2 Food Hygiene course must be undertaken and completed within three months of starting work at the University premises and in the interim period such staff must be directly supervised and instructed.
- 7.4 Supervisors and Managers of catering operations shall undertake and complete a Level 2 food hygiene course before commencement of such duties and a Level 3 course within three months of commencing those duties. Where this is not achievable steps must be taken to ensure direct access to persons who have obtained at least Level 3 qualifications. In any event the member of staff must attain Level 3 training within 8 months of commencement of those duties.
- 7.5 Level 2 food hygiene training must be updated at intervals of no more than 3 years by completing a certificated refresher course. For the avoidance of doubt this requires a full course and completing the examination in accordance with QCA requirements **or equivalent** including tutor led training. It is recommended that Level 3 food hygiene training be updated every 7 years and Level 4 every 10 years (or sooner if there is a major change in food safety legislation) also via tutor led training as recognised by the QCA **or equivalent**. In any event such trained personnel must demonstrate up-to-date knowledge through regular refresher training such as one day courses not less than every 3 years. Where a Catering Provider wishes to deviate from this method of training the advice of Head of University Catering Operations to be sought.
- 7.6 Access must be available to at least one person within the management of the catering facility who has received training in HACCP based food safety management systems.
- 7.7 All providers of food within the University should subscribe to the FSA website in order to receive regular updates on food hazards and changes in legislation as well as guidance on food safety ensuring up-to-date knowledge. Staff must be regularly updated on new advice on relevant food safety risks and changes in legal requirements that affect their work.
- 7.8 The level of training required to be undertaken by a Food Handler will vary depending on the type of food, level of contact and associated risk. E.g. those preparing tea/coffee and biscuits for visitors may only need to read a guidance leaflet whereas those preparing cooked meals would require full Level 2 food hygiene training as a minimum. Where there is doubt advice should be sought from the Head of University Catering Operations.
- 7.9 As identified in this policy, all employees of the operator, whether contractor or directly employed by the University will be expected to have undergone classroom style training equivalent to QCA standards. Where larger organisations provide their own in-house training they must demonstrate how it achieves QCA standards. The University does not accept that

food handlers, and those managing such operations, who have undergone only online training, have sufficient understanding of the principles that would be expected of food handlers who have undergone classroom teaching to QCA standards.

8. Food Allergens and Intolerance to Food

- 8.1 EU legislation requires the provision of information to consumers, where sought, as to the ingredients of food. Each catering provider is required to draw up a procedure for disseminating information to customers which must include a designated person or persons available during food service for disseminating the information, the same person or another for collating information, a prominently displayed sign identifying who to ask situated in locations where food is presented for sale and how to obtain the information as well as a means of recording the presence of allergens and making that information accessible. The procedures must adequately identify the presence of the designated allergens (currently 14) as identified on the Food Standards Agency website. To comply with this Policy the procedures are to be forwarded to the Head of University Catering Operations to enable checking of adequacy.
- 8.2 It is a requirement of this Policy that all food handlers and service staff, including casual staff and temporary staff, are trained on allergen awareness to ensure they are competent to be able to advise where to obtain the information, when asked and who the designated person is.
- 8.3 The information system must ensure customers are provided with accurate information and where the presence of ingredients is not known or in doubt a designated person must take control of informing the customer. The system must ensure that cases of unknown ingredients cannot be represented as absent an allergen.

9. Food Composition

9.1 EU legislation is introducing a requirement to provide compositional information including nutritional information on all pre-packed foods which were not packaged on the premises where the food is sold. Each catering provider must implement procedures and arrangements to ensure full composition and nutrition information is displayed on all pre-prepared and pre-packaged food that are displayed or on offer for sale, except where prepared and packaged on the premises where they are being sold.

9.2 Voluntary declarations of nutrition are subject to strict rules and any proposal to make such claims must be recorded as part of the nutrition labelling procedures. Where a catering provider chooses to provide some nutritional information a designated person or persons must be appointed to ensure information is correctly displayed and accurate. To comply with this Policy the procedures are to be forwarded to the Head of University Catering Operations to enable checking of adequacy.

10. Food Quality

10.1 Food safety has intrinsic links to food quality both as a means of reducing food safety risks and because food quality offences operate in tandem with certain food safety offences. This policy focuses on food safety but all catering suppliers are expected to formulate procedures to ensure foods remain of the quality demanded by purchasers. This should include storage and stock rotation to ensure fresh products, use of foods within their designated 'Best Before' date, storing foods within recommended temperatures, not using food subject to 'freezer burn' and not displaying foods for sale such as soft fruit subject to significant visible effects from spoilage bacteria.

11. Definitions

11.1 Catering Provider

Any individual, group, company or other body supplying catering services or any other catering related service (e.g. vending machines, platters of sandwiches etc.) which may include the provision of food and/or drink (including alcohol).

11.2 Food Handler

Any person involved in the preparation or service of food and drink. The level of training required to be undertaken by a Food Handler will vary depending on the type of food, level of contact and associated risk. Handlers of high risk foods must achieve level 2 training.

11.3 Fitness for work

Regulatory guidance and best practice advice for food business operators issued by the Food Standards Agency (latest version 2009 See <http://www.food.gov.uk/sites/default/files/multimedia/pdfs/publication/fitnesstoworkguide09v3.pdf>) it deals specifically with infection control issues in relation to food handling staff and those who work within catering.

11.4 HACCP (Hazard Analysis and Critical Control Points)

Food Safety Regulations require all catering operations to implement a food safety management system based on the principles of HACCP. This means it must include the carrying out of a hazard analysis and identifying critical controls that prevent that hazard becoming an unacceptable risk. HACCP based systems have been adopted by University Catering to meet this legislative requirement, and form the basis of food safety at the University of Cambridge. Managing food safety also now requires addressing information to consumers on contents that may present a risk of allergic reaction and intolerance in some people.

11.5 High Risk Food

Ready-to-eat foods that support the multiplication of pathogenic bacteria in their current state (i.e. excludes foods such as canned tuna) and are intended for consumption without further treatment which would reduce such organisms to a safe level. Generally, this includes cold foods that would usually be refrigerated and virtually all hot served food.

11.6 Industry Guides and Food Safety Guidance Notes

The Food Standards Agency (FSA) produces a series of documents including Industry Guides, under the Food Safety Act and EU Regulations, giving details of how to ensure compliant operations in accordance with legislation. The University produces its own series of Food Safety Guidance Notes but all providers of food within the University should subscribe to the FSA website in order to receive regular updates on food hazards and changes in legislation.

11.7 Low Risk Foods

Those within which pathogenic micro-organisms do not normally grow at room temperatures. These foods are usually wrapped and stored at room temperature e.g. confectionery, tea bags, biscuits.

11.8 Preferred Suppliers

Those suppliers of goods and services nominated by Procurement Services of the Finance Division (<http://www.admin.cam.ac.uk/offices/purchasing/>) that have been subject to a formal tendering process and pass the auditing process.

11.9 QCA

The Qualifications and Curriculum Authority (QCA) is a non-departmental public body, sponsored by the Department for Education and Skills (DfES). It is governed by a board, whose members are appointed by the Secretary of State for Education and Skills, and managed on a day-to-day basis by an executive team. QCA maintains and develops the national curriculum and associated assessments, tests and examinations; and accredits and monitors qualifications in colleges and at work.

11.10 Allergens and Intolerances

In food allergy, an abnormal immune system response results in the body making antibodies to 'fight off' a food. Food allergy, either IgE antibody mediated or delayed non-IgE mediated allergy are reactions caused by the immune system, which affects approximately 1% of adults and 5-9% of children in the UK. However, some people suffer symptoms after eating certain foods even when they are not producing antibodies against them. A variety of different mechanisms can cause foods to affect people in this way. These non-immune reactions are known as food intolerances.

11.11 Nutritional Information

Nutrition is the intake of food, considered in relation to the body's dietary needs. Nutrition information is on the average amount of energy value plus the amounts of fat, saturates, carbohydrate, sugars, protein and salt, as well as any other claim that requires nutrition information. For example, if a food had a 'good source of fibre' claim then the amount of fibre in the food must be shown in the nutrition information. It also covers starch, vitamins and minerals.

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