

Food Safety Policy

University of Cambridge

2025

Purpose of Document

Related documents:

Table 1: Revision History

<i>Policy Title</i>	Food Safety Policy
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<i>Approving Body/Bodies</i>	<i>General Board and Council</i>
<i>Responsibility for Implementation</i>	<ul style="list-style-type: none"> • <i>The Head of University Catering for the University Catering Service and external suppliers who have contracts managed by the Estates Division.</i> • <i>Heads of Department for their own Institution.</i>
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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 and industry best practices and to minimise any risk of incidents or infection transmission by food.
- 1.2. The risk of spreading foodborne infection cannot be entirely eliminated but this policy is directed not only at minimising the risk of incidents but also ensuring appropriate procedures are in place to minimise the onward spread of infection or risk of future incidents.

1.3. Reducing Food Allergy Risks in Young People (Aged 16–24)

Young people are at greater risk of severe or fatal allergic reactions due to:
Living independently for the first time
Risk-taking behaviour in adolescence and early adulthood
Fear of standing out when disclosing allergies

Recommendations

- Encouraging open conversations about allergens can significantly reduce risks.
 - Making it normal and safe to ask about food ingredients saves lives.
 - Create a culture where "It's okay to ask" is the norm
 - Train staff to proactively raise the topic of allergens
 - Use peer-driven messaging to reach this age group
- 1.4. Catering facilities are operated by the University Catering Service, or the provision of food is managed by the department itself, or it is contracted to persons or businesses that are not directly employed by the University. These other catering providers are required by the University to maintain the more exacting standards of the University Catering Service and not just meet minimum legal 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.

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 catering 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 associated 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 catering providers on university property, including preferred suppliers.
- Departments or clubs which provide food for departmental, social, or charitable events.

3.2. Provision of food to others without charge, as a gift or otherwise, is not exempt from the food safety laws. Food safety advice on such provision of food is given in guidance leaflets available from the [University Catering Food Safety webpage](#).

3.3. 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.

4. Breach of Policy

4.1. The Director of Estates, on the recommendation of the Head of University Catering Operations, reserves the right to instruct any individual, group, company or other body supplying catering services or any other service relating to food and drink on University premises, to cease activity immediately in the event of failing to comply with any of the major elements of this Policy (as determined by the Head of University Catering Operations).

4.2. The catering 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 Director of Estates or their nominated representative seeking approval for the recommencement of the service.

5. Compulsory Food Safety Standard

5.1. All catering providers will comply with all current and relevant food safety, compositional, quality and food information legislation.

5.2. All food businesses (University Catering Service and other catering providers) 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 closure. In the event of doubt as to whether an activity needs to register, for example an infrequent or charity event, written advice should be sought from the local authority and must be retained.

- 5.3. The catering provider will be expected to maintain high standards of cleanliness of the catering areas and equipment at all times. The catering provider will also comply with all requests from the Head of University Catering Operations and the Local Environmental Health Department. All correspondence from the Local Environmental Health Department, including reports following inspection of the facilities, must be copied to the Head of University Catering Operations and actioned in accordance with any stated requirements.
- 5.4. The catering provider will operate a Food Safety Management System (FSMS) based on Hazard Analysis Critical Control Points (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. The catering provider may be required to attend Food Safety Meetings on specific issues.
- 5.5. All external catering providers 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 hospitality to the University.
 - Catering Providers who are not already registered must agree to be audited by representatives of the Head of University Catering Operations prior to commencing 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 1 year for hospitality services, commencing at the start of the contract to operate a catering facility within the University. It is then normally renewed every year subject to a satisfactory repeat audit.
 - NB The initial and annual follow-up audits are carried out by food safety experts appointed by the University with **a fee payable by the University** to cover the costs.
 - External Catering Providers will advise the University immediately, in writing, of any concerns regarding food provided to them, complaints received from University customers, or of 'complaint generated' visits from the local authority. They will also agree to provide the University with their latest Environmental Health Inspection report. If premises are downgraded in the hygiene rating system to below 4, an investigation will be carried out by the University food safety advisors.
- 5.6. 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 subjects 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.
- 5.7. Departments requiring catering from a specialist supplier for specific dietary requirements (e.g. strict kosher) or caterers from other parts of the country or abroad, should contact the Head of University Catering Operations for guidance.

6. Food Safety Training

- 6.1. 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 commensurate with their job role (see 6.2-6.5) and as demonstrated through a training and qualification organisation recognised as competent by the University. Classroom style training is preferred and where this is not undertaken the Catering Provider must demonstrate and provide evidence on how learning and comprehension is checked. Where larger organisations provide their own in-house training, they must demonstrate how it achieves the competency standards required by the University.

- Copies of food safety training certificates should be given to the University.
 - Where online training has been received then full details of the body used with accreditation is to be provided.
 - 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. This training should be recorded in the HACCP documentation.
- 6.2.** It is a requirement of the Policy that all food handlers of high-risk foods, 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.
 - A Level 2 Certificate in Food Hygiene, or equivalent 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 by someone who has attained such qualifications.
- 6.3.** It is a requirement of the Policy that all Supervisors and Managers of catering operations comply with the following training programme:
- Undertake and complete a Level 2 food hygiene course before commencement of such duties and a Level 3 Certificate in Food Hygiene, or equivalent, 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.
 - The supervisor/manager must attain the Level 3 qualification within 8 months of commencement of supervisory or managerial duties.
- 6.4.** Level 2 food hygiene training must be updated at intervals of no more than 3 years by completing a certificated refresher course using a training and qualification organisation recognised as competent by the University. Where available, tutor-led training is preferred.
- 6.5.** 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 using a training and qualification organisation recognised as competent by the University and where available, tutor led training is preferred. 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.
- 6.6.** Where a Catering Provider wishes to deviate from the method of training in 6.2-6.5 the advice of the Head of University Catering Operations must be sought.
- 6.7.** 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.

- 6.8. All catering providers within the University should subscribe to the Food Standards Agency 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.
- 6.9. 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. Food Allergens and Intolerance to Food

- 7.1. Food Labelling Regulations require 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) a designated person or persons available during food service for disseminating the information.
- b) the same person or another for collating information.
- c) a prominently displayed sign identifying who to ask, situated in locations where food is presented for sale and specifying how to obtain the information.
- d) 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.

- 7.2. 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 know who the designated person is. Training must be received from a training and qualification organisation recognised as competent by the University.
- 7.3. It is imperative that all personnel involved in the food business (including administrative staff who may receive telephone orders / communications regarding special diets) are given basic training to ensure they understand the principal issues and the importance of correct communication with regards to allergens. The Food Standards Agency have a free online course on the subject which is highly recommended.
- 7.4. The information system must ensure customers are provided with accurate information and where the presence of ingredients is not known or is 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 the absence of an allergen.
- 7.5. Where a food business provides pre-packaged food for direct sale (even if it is

made on the same premises it is sold) it must be labelled listing all the ingredients, with any of the 14 allergens highlighted. This is set out under the regulation commonly now referred to as Natasha's Law. Prepacked for direct sale (PPDS) is food that is packaged at the same place it is offered or sold to consumers and is in this packaging before it is ordered or selected. It can include food that consumers select themselves (e.g. from a display unit), as well as products kept behind a counter and some food sold at mobile or temporary outlets.

8. Food Quality

- 8.1.** 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.

9. Roles and Responsibilities

- 9.1.** This Policy is approved by the General Board and University Council at the recommendation of the Estates Committee. The Technical Sub-Committee of the Estates Committee receives reports of significant findings of food safety audits or investigations of food poisoning complaints.

9.2. Director of Estates

The Director of Estates or their nominated representative will ensure that significant findings of food safety audits or investigations into claims of food poisoning incidents are reported to the Technical Sub-Committee. The Director of Estates has the right to instruct the catering provider to cease activity immediately where there is a failure to comply with requirements of this policy.

9.3. The Head of University Catering Operations

The Head of University Catering Operations develops and revises the Food Safety Policy for approval as detailed in 9.1. 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 monitored and audited by the Head of University Catering Operations to ensure compliance with this Policy and legislative requirements.

9.4. 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 Head of University Catering Operations 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.

9.5. 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.

9.6. Other Catering Providers Occupying University-Owned Food Premises

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 regarding structural and fixed equipment. However, the day-to-day operation is the responsibility of the catering provider and must always comply with legislation and this Policy. Failure to comply may result in the termination of the lease forthwith on receipt of written notice.

9.7. Responsibilities in Food Areas

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

The West Hub and other operations managed by the University Catering service: Estates Division are responsible for ensuring that this Policy is implemented in those areas for which they have control.

Catering outlets run by departments, and any other Food Areas for which the Estates Division do not have control: 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.

10. Definitions

10.1. 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.

10.2. 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).

10.3. Competent training provider

A training and qualification organisation recognised as competent by the Cambridge City Council Department of Environmental Health. The training provider must be able to demonstrate that they have designed the programme to deliver all levels of comprehension and learning needs; developed it in such a way to cover the subject matter with an effective learning method/s and in a format that the learner can understand and perform to the best of their ability. The course / sessions should also conclude with an assessment to determine the student's comprehension and understanding of the subject matter. There should also be a form of evaluation provided.

10.4. Fitness for work

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

10.5. 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.

10.6. 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.

10.7. 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.

10.8. 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 Leaflets (see related links at <https://www.unicen.cam.ac.uk/food-safety>) 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.

10.9. 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.

10.10. Nutritional Information

Nutrition is the intake of food, considered in relation to the body's dietary needs. Nutrition information includes 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.

10.11. Preferred Suppliers

Those suppliers of goods and services nominated by Procurement Services (<https://www.unicen.cam.ac.uk/university-catering-services/hospitality-suppliers>)

that have been subject to a formal tendering process and pass the auditing process.

10.12. Prepacked for Direct Sale Food (PPDS)

Prepacked for direct sale (PPDS) is food that is packaged at the same place it is offered or sold to consumers and is in this packaging before it is ordered or selected. It can include food that consumers select themselves (e.g. from a display unit), as well as products kept behind a counter and some food sold at mobile or temporary outlets.

Food is classified as PPDS if it is packaged as follows:

- The food is fully or partly enclosed by the packaging.
- The food cannot be altered without opening or changing the packaging.
- The food is ready for sale to the final consumer.

Any food business that is unsure as to the definition should check up on the Food Standard Agency website (allergen resources).

10.13. Tutor Led / classroom training

A training method that involves an instructor leading a classroom of learners in real-time. Sessions are conducted in a classroom setting, where learners and instructors can interact and discuss training content in person.

The University recognises that food handlers, and those managing such operations, who attend classroom led training have a greater comprehension of the principles of food safety compared to those who have undergone only online training.

Effective date of this Policy: 2025

Date of next review: 2028