**Food Safety Series**

University of Cambridge

Food Safety Policy

2022

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**1. Food Safety Policy Statement**

* 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. 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. 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. 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. 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. 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. 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 Sub Committee for Estate Safety. 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 Sub Committee for Estate Safety

* 1. 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.
  2. 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 Sub Committee for Estate Safety

**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 Sub Committee for Estate Safety \*), the Sub Committee for Estate Safety 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 Sub Committee for Estate Safety seeking approval for the recommencement of the service.

\*Any breach of food safety laws as set down in EU Directives (for as long as they still apply to the UK), 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 Sub Committee for Estate Safety*

The Sub Committee for Estate Safety 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 Estates*

The Director of Estates will ensure that significant findings of food safety audits or investigations into claims of food poisoning incidents are reported to the Sub Committee for Estate Safety.

*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 Sub Committee for Estate Safety. 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.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 and the advice received be requested in writing and retained.

*5.8 Responsibilities in Food Areas*

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

*5.9 Estates Division* – 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 food safety qualification to a Level 3 Certificate in Food Hygiene. All other catering staff to possess at least Level 2 Certificate in Food Hygiene within the first 3 months of employment and under close supervision and instruction of someone who has attained such qualifications. Copies of food safety training certificates should be given to the University. These certificates must be from a training and qualification organisation recognised as competent by the University. and preferably based on classroom led training. 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.

*6.5* 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. External contractors will advise the University immediately in writing of any concerns of food provided to them, complaints from University customers or of ‘complaint generated’ visits from the local authority . They will also agree to provide the University of their latest Environmental Health Inspection report and where an officer deems the premises to be downgraded in the hygiene rating system to below 4, an investigation will be carried by the University food safety advisors.

**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 commensurate with their job role 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.

*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 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.

*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 using a training and qualification organisation recognised as competent by the University. Where available, tutor led training is preferred. 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. 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 food safety training commensurate with their job role and where available, classroom style training is preferred. Any training must be undertaken using a training and qualification organisation recognised as competent by the University and evidence provided by means of certification. Where larger organisations provide their own in-house training they must demonstrate how it achieves the competency standards required by the University.

**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. Training must be received from a training and qualification organisation recognised as competent by the University.

*8.3* It is imperative that all personnel involved in the food business including admin staff who may receive telephone orders / communications regarding special diets are given basic training to ensure they understand the principle 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.

*8.4* 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.

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 or 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.

**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.

*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.

*11.9Tutor Led / classroom training*

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.

*11.9 Competent training provider*

A training and qualification organisation recognised as competent by the University is one that provides training that is in line with the Standards and Testing Agency (STEM). The training provider must be able to demonstrate that they have designed the programme to sort 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.

*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 Prepacked for Direct Sale Food (PPDS)

Prepacked for direct sale or 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).

*11.12 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.

Nick White

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