Royal Holloway, University of London
Policy on using external catering services

The purpose of this policy is to set out the College’s position with respect to food safety legislation and departments that want to organise catering for College staff/students using external catering services or food providers regardless of venue. The requirements must be met whether the service offered is tea and biscuits, a cold sandwich lunch or a more formal dinner service.

Throughout this policy the term ‘food’ includes the service and provision of drink. The term ‘catering’ includes the sale or supply of food or drink for human consumption including alcoholic or soft drinks.

Money does not have to be exchanged for food, in order for it to be covered by food safety legislation.

College policy on the provision of food

The College’s policy is that all catering should be supplied using the Royal Holloway registered food businesses. This is to protect the College from legal claims for compensatory payments from members of staff or the public.

In the event of an allegation of food contamination or poisoning, the only defence that the College has is that of “due diligence”. In order to claim a due diligence defence, the proprietor of the food ‘business/operation’ must show that precautions were taken to maintain the safety of the food offered and to make sure things did not go wrong.

The responsibility to produce/supply safe food remains with the ‘proprietor’ of the food operation and not with the owner of the premises. It is College policy that the responsibility and legal liability for the safe supply of food from sources other than Campus Services Conference and Catering Services or the Student Union, will lie fully with the department and staff organising and supplying the food.

The person organising the event is responsible for ensuring that the food being offered meets the requirements of all the relevant food safety and licensing regulation.

The following paragraphs provide an indication of the standards and practices required to meet the requirements of the regulations and a summary of the content of the regulations.
Food Hygiene supervision, instruction and/or training

It is the responsibility of the food business proprietor to ensure that all persons handling food have received a level of training commensurate with their food handling activities. This is particularly important where Royal Holloway staff are the “food handlers”.

Under the regulations a food handler is defined as any person in a food business who handles or prepares food whether open or packaged and it includes drink and ice.

The level of training needed will depend on the type of food being handled. Persons handling “high risk food” will need a greater degree of training and supervision.

Where a ‘caterer’ is being used then you must establish what level of training their staff who will be working in our premises have received. Supervisory or staff handling high risk foods must have received formal recognised training. Large suppliers may run their own in-house courses which will be of the appropriate standard. Alternatively there are a number of accredited hygiene courses run by the following organisations that staff can complete:

- The Chartered Institute of Environmental Health
- The Royal Institute of Public Health and Hygiene
- The Royal Society of Health
- Society of Food Hygiene Technology.

Some vocational courses also offer an element of food hygiene training. A separate food hygiene course would then not necessarily be needed.

If agency staff are hired the member of Royal Holloway staff hiring them must instruct them in the essentials of food hygiene and be satisfied that those who need higher levels of training have received it.

The Essentials of Food Hygiene for food handling staff

- Keep yourself clean and wear clean clothing, this must include a hat. Staff with long hair must tie their hair back and keep away from their face with grips if necessary.
- Do not wear the same clothes you wear travelling to work that you will wear in the kitchen/food service area.
- No jewellery may be worn when handling food, except for wedding rings and plain sleeper style earrings.
- Always wash your hands on
  - entering the kitchen/food service area
  - before handling food and between tasks
  - after visiting the toilet
  - after touching any part of your face or head
Food handlers fitness to work

Where Royal Holloway staff are to handle or serve food the organiser must ensure that they are fit to work. A summary of points to be considered is given below and relates to the persons involved in food production, preparation, service or sale. It is provided in addition to the ‘essentials of food hygiene’. Full details of the requirements can be found on the Food Standards Agency web site: [http://www.food.gov.uk/business-industry/guidancenotes/hygguid/foodhandlersguide](http://www.food.gov.uk/business-industry/guidancenotes/hygguid/foodhandlersguide)

This guidance is given to prevent microbiological contamination of food by the food handler.

- Persons suffering with gastrointestinal illness must be excluded from handling food.
- Persons who have had diarrhoea and vomiting in the last 48 hours must be excluded from handling the food.
- Persons who have suffered with Enteric fever, e.g. typhoid and paratyphoid must be excluded from food handling.

- after handling money, raw foods or waste.
- Tell your supervisor before coming to work if you are suffering from any skin, nose, throat, stomach or bowel trouble.
- Cuts or sores will be covered with a blue waterproof dressing before entering the kitchen/food service area.
- Do not cough or sneeze over the food. After coughing or sneezing immediately wash your hands.
- Do not smoke, eat or drink in a food room.
- Avoid touching the food at all times with your hands, use the utensils provided.
- Keep food covered at all times.
- Keep food in the temperature control units until it is required for service.
- Keep raw and cooked or ready-to-eat foods separate.
- Use separate utensils and equipment for handling raw and cooked or ready-to-eat foods.
- ‘Clean as you go’ using the chemicals provided in the manner in which you have been trained.
- Disinfection of food contact surfaces is essential before and after tasks and for some items at regular intervals throughout the day.
- Follow any food safety instructions given by the supervisor or manager.
• Persons who have suffered with Hepatitis within the last 7 days must be excluded from handling food.

• Persons with lesions on exposed hands, face, neck and scalp that are actively weeping/discharging must be excluded from handling food.

• Persons with infections of the eyes, ears and mouth that are weeping/discharging must be excluded from food handling.

• Persons suffering with respiratory diseases that result in sneezing or coughing must be excluded from handling food.

Where a caterer is used the organiser must establish that the caterer has procedures in place for monitoring their staff’s health.

**Mobile and/or temporary premises and premises used for occasional commercial food preparation**

The ‘rules of hygiene’ relating to the premises are contained in the Food Safety (General Food Hygiene) Regulations 1995. When a premise is used for occasional commercial food activities the person organising it must have regard for the other activities that have taken place in the premise. It is understood that food may be prepared within Royal Holloway non-catering departments, for example in staff rooms or common rooms or lecture/seminar rooms.

The premise must be thoroughly cleaned and disinfected before food preparation begins to ensure there is no risk of food contamination.

If College staff are responsible for the production/preparation of the food then they are responsible for ensuring that the place the food is prepared in will ensure the safety of the food.

If an external caterer produces the food then the caterer is responsible for the safe production of the food. The College Staff are responsible for approving the external caterer as qualified to deliver the specified food service and that the premise or room/s provided for them to use are safe for the production or service of food.

The regulations that apply to mobile or premises used for occasional food preparation are summarised below.

• Premises shall be sited, designed, constructed and kept clean and maintained in good repair so as to avoid the risk of contaminating foodstuffs and harbouring pests so far as is reasonably practicable.

• Appropriate facilities must be available to maintain adequate personal hygiene (including facilities for the hygienic washing and drying of hands).
• Surfaces in contact with the food must be in sound condition, easy to clean and disinfect.

• Adequate provision must be made for the cleaning and disinfecting of work utensils or equipment.

• Adequate provision must be made for the cleaning of food stuffs.

• An adequate supply of hot and cold and potable water must be available.

• Adequate arrangements and facilities must be available for the hygienic storage and disposal of waste.

• Adequate facilities for the maintaining and monitoring of suitable food temperatures.

• Foodstuffs must be so placed to avoid, so far as is reasonably practicable the risk of contamination.

Full details of the regulations and guidance to compliance are given in ‘Industry Guide to Good Hygiene Practice: Catering guide’.

Transporting food

When food is delivered to the College by the supplier the responsibility for legal compliance lies with the supplier until the food is signed over to the member of College staff.

When College staff purchase food for catering, the responsibility for compliance lies with the member of staff from the point of purchase until consumption. This includes transportation from the location of purchase.

The ‘rules for hygiene in respect of transport’ contained in the Food Safety (General Food Hygiene) regulations may be summarised as follows:

• conveyances and/or containers for transporting foodstuffs must be clean and in good condition and protect the food from contamination. Where necessary they must be designed and constructed to permit cleaning and disinfection

• receptacles for transporting foodstuffs must not be used for other items where this could result in contamination of foodstuffs

• where conveyances or containers are used for transporting foodstuffs and non-foodstuffs or different types of foodstuffs there must be effective separation to protect against the risk of contamination

• where conveyances or containers are used for transporting anything other than food there must be effective cleaning in between loads to avoid risk of contamination

• foodstuffs in conveyances and/or containers must be so placed to protect and minimise any risk of contamination
where necessary conveyances and/or containers used for transporting foodstuffs must be capable of maintaining foodstuffs at the appropriate legal temperatures and where necessary allow the temperatures to be monitored.

Temperature controls
This section provides guidance on the content of the Food Safety (Temperature Control) Regulations 1995. The temperatures referred to are food temperatures and not air temperatures or the temperature displayed on the exterior of controlled storage units. There is a general requirement for all food to be kept under temperature control if that is needed to keep it safe for consumption.

Ideally calibrated temperature probes should be used for monitoring temperatures. The temperatures displayed on the exterior of temperature controlled holding units must not be relied upon.

Compliance with the temperature control regulations is the responsibility of the members of staff organising, preparing and offering the food.

The regulations can be summarised in the following points.

- The legal requirement for holding cold perishable food is 8ºC, however it is best practice to hold cold food in storage at 5ºC.
- Food is allowed a short time outside temperature control for the purposes of transfer, preparation, defrosting or breakdown of the equipment.
- Cold food that is on display or is out on service may be kept at temperatures higher than 8ºC for one period of up to 4 hours only.
- Hot food must be cooked to a temperature in excess of 75ºC for more than 30 seconds.
- Hot food must be kept at temperatures in excess of 63ºC.
- Hot food may be kept at a temperature cooler than 63ºC for one period of up to 2 hours maximum, if it is for service or display.
- Food that has been cooked and is to be cooled for service must be cooled quickly. No specific limits are set but the Department of Health Guidelines specify a time period not exceeding 90 mins.

The regulations themselves do not give a definitive list of foods to be covered. However, they do give guidance on foods that are likely to be subject to temperature control which include:

- cooked meats, fish and meat and fish products;
- cooked meats in cans that have only been pasteurised;
- cooked vegetable dishes;

Date of Creation: 30.10.06
Date reviewed: 05.12.13
Document owner: Environmental Health Supervisor, Campus Services
• any cooked dish containing egg or cheese;
• prepared salads or dressings;
• soft cheeses or mould ripened cheese;
• smoked or cured fish;
• any sandwiches containing the above foods as a filling;
• low acid desserts and cream products;
• fresh pasta and partly cooked pasta and dough products; and
• smoked and cured meats that are not ambient stable.

Occasionally manufacturers may recommend different storage temperatures or
requirements. In these cases the use by dates and handling instructions must be closely
followed.

Auditing a supplier
It is Royal Holloway policy to perform some assessment or audit on the company to
supply the food. Details of the process to follow are given in the “What to do to when
organising external catering services” document.

The process includes:
• obtaining information from the supplying company;
• contacting the company’s local Environmental Health Department to confirm the
  company is actually registered with them and if there are any outstanding legal
  actions pending; and
• establishing if the company has received accreditation from a third party auditing
  body such as the British Retail Consortium, British Sandwich Association, SOLAS or
  the Support Training Services.

Food Premises Registration
If a department offers a food service on five or more days in any consecutive five week
period, then the department must be registered under the premises regulations as a food
business. The application for registration must be made through Runnymede Borough
Council, Environmental Health Department.

There is a legal requirement for all businesses to obtain registration with the local authority
28 days prior to the offer of any food service.

Exemptions from the regulations are available where:
• a registered catering business is used to supply the food;
• the only food supplied is beverages, biscuits, crisps, confectionery or other similar
goods;
• the food is offered as part of a religious ceremony; or
• the food is solely supplied from a vending machine operation.

The penalty for failing to comply with the regulations on summary conviction is a fine not exceeding level 3 on the standard scale.

The Campus Services Catering operations are registered with the Environmental Services Department in Runnymede Borough Council. This registration is not transferable and does not extend to cover non-catering buildings or departments. If a department is unsure if they should be registered or not, then they can contact Runnymede Borough Council for advice.

**EU Hygiene Regulations**

852/2004 on the hygiene of foodstuffs:
This is the general food hygiene regulation which places obligations on all food business operators to undertake steps to ensure the hygienic production of food. The regulation contains the detailed requirements to the structure, cleanliness and maintenance of food premises and equipment, the training of staff in hygiene matters and HACCP principles, and the requirement for food businesses to register with their local authority prior to trading.

178/2002 on General Food Law:
This regulation lays down the foundations for legislation relating to food and animal feedstuffs. The key obligations are as follows: unsafe food must not be placed on the market; labelling, presentation and advertising of food must not mislead the consumer; food businesses must have systems to ensure traceability of food; and when unsafe food is placed on the market the business must have steps in place to withdraw or recall it.

These two EU regulations are enforced in the UK under The General Food Regulations 2004 (as amended). These regulations are made under The Food Safety Act. There are two main defences against prosecution. Firstly the offence was due to the fault of another person. For example a foreign body in a bread roll – the caterer could not know that the item was there so the prosecution would pass to the baker. Secondly, is the defence of ‘due diligence’. In this instance the defendant can prove that they took all reasonable precautions and exercised all due diligence to ensure that an offence was not committed.

**Liquor licences**
The sale of liquor requires the seller to be licensed for ‘sale by retail of alcohol’ by their local authority. If intoxicating liquor, beer, wine or cider are offered with food and no payment is required from the guests/recipient, then it is not required to be covered by that license. However, this must still be done in accordance with the College’s Premises License and relevant statutory requirements.
If full or part payment for the meal and drink is received from the guests/ recipients then it is deemed to have been ‘sold’. This means that the sale would need to be as part of the license and supervised by a personal license holder. This transaction can only take place in designated buildings identified under the license.

The Premises Licence currently held by Campus Services are not transferable to other departments because they are licensee specific. Any sale of alcohol would have to be supervised by a Personal License holder.

**Food safety risk assessments**

The EU regulations require the proprietor of a food business to carry out a food safety risk assessment or HACCP. The aim is to identify any step in the activities of a food business that are critical to food safety and to take steps to ensure that adequate safety procedures are identified and implemented, maintained and reviewed.

If a department needs to be registered under the registration regulations, they will need to operate under the requirements of the food hygiene regulations and carry out a food risk assessment.

Even if a department does not need to be registered it is still best practice to carry out a food safety assessment in line with the duty of care to all persons placed on the College under the Health and Safety at Work Act 1974.

An assessment examines the workplace to make sure that food can be handled, transported, stored, prepared, cooked and served in a manner that keeps it safe and free from contamination.

It looks at the food operation step by step and introduces procedures to make sure that the food is ‘safe’ at every stage. There are five basic steps to the assessment:

1. analyse the potential food hazards in the food operation; for example how a food could be made harmful or contaminated;
2. identify the points where the hazards could occur;
3. decide which points are critical;
4. identify and implement effective control and monitoring procedures to ensure food is protected at the critical points; and
5. review the analysis, the control points and the monitoring procedures whenever the food operations change or periodically.

This is sometimes referred to as HACCP, which stands for Hazard Analysis and Critical Control Points. A full HACCP system such as is used in food factories involves a great deal of documentation and may generate many written records. The regulations do not demand written records but they go someway to providing a ‘due diligence defence’.
Detailed information on the principles to follow can be obtained from the following guides:

- Assured Safe Catering;
- Department of Health;
- HMSO;
- S.A.F.E; and
- British Hospitality Association.