



Health & Safety Food Safety Policy

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¹ or earlier if change in legislation or on risk assessment

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1. Introduction

The health and safety of our staff, students and visitors, who collectively make up our university community, is vitally important to us. To achieve this, the university recognises the risk that unsafe food presents to consumers' health and is therefore committed to effectively managing food safety and achieving high standards of food hygiene across all university activities.

2. Aims

The specific aims to food safety are to ensure:

- All food delivered to or supplied by the university is prepared, processed, manufactured, packaged, stored, transported, distributed, handled, labelled, provided or sold in accordance with applicable food safety legislation.
- Alcohol is sold or supplied responsibly and in accordance with relevant licensing laws.
- All food outlets operated by the university are registered with the appropriate local authority.
- All third-party catering providers brought in to provide additional services using the university premises are registered and approved by the university for their undertaking.
- All food business operations have implemented an appropriate and adequate food safety management system and controls commensurate with the type of provision to ensure food safety standards are met and maintained.
- The procurement policy - to ensure that we appoint third-party caterers who are suitably competent and can consistently deliver goods and services to our quality, safety, financial and technical requirements to ensure we mitigate risks and deliver value for money.

3. Scope

This policy applies to all catering activities undertaken by or on behalf of the university. This includes but is not limited to:

- In-house catering services operated by Property & Facilities Catering, Hospitality & Conferencing.
- Events involving external catering organised by a School, Service or ENSA.
- Third-party catering providers, for example, contract caterers, food vendors, ice cream vans, mobile food traders or food delivery services for events.

This policy does not apply to:

- Food that is brought onto university premises for personal consumption.
- Food purchased and prepared by residents in self-catering accommodation.
- Feeding arrangements for off-campus activities, such as meals provided during field trips, research activities and business travel.

4. Regulatory Background

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

- The Food Safety Act
- Regulation (EC) No 178/2002 laying down the general principles of food law and procedures in matters of food safety
- Licensing Act
- The General Food Regulations
- Regulation (EC) No 852/2004 on the hygiene of foodstuffs
- Regulations (EC) No 853/2004 laying down specific hygiene rules for food of animal origin
- The Foods Hygiene (Scotland) Regulations
- Food Information Regulations

5. Definitions

Food

Any substance or product, whether processed, partially processed, or unprocessed, intended to be or expected to be ingested by humans - this includes drinks and water or any substance incorporated into the food during its preparation or treatment.

A School, Service or Student Body, undertaking activities which constitute a food business, will request authorisation through Property & Facilities Service Desk.

Food Business

Any undertaking involving food and one or more of the following activities: preparation, processing, manufacture, packaging, storage, transportation, distribution, handling, supply, or sale, whether for profit or not, and whether public or private.

Food Business Operator

The persons responsible for ensuring that the requirements of food safety legislation are met within the food business under their control.

Food Handler

Any person supplying and handling food for consumption on university premises.

Food Poisoning

Any disease of an infectious or toxic nature caused by the consumption of contaminated food or water.

Food Safety Management System (FSMS)

A written document that details the policies, procedures, practices, controls and documentation that ensure the food sold by a food business is safe to eat and free from contaminants.

Hazard

A biological, allergenic, chemical, or physical agent in, or condition of, food with the potential to cause harm to the consumer.

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Hazard Analysis

The process of collecting and evaluating the information on hazards and conditions leading to their presence to decide which are significant for food safety and should therefore be controlled.

High-Risk Food

Ready-to-eat foods which, under favourable conditions, support the multiplication of pathogenic bacteria and are intended for consumption without further processing that would destroy such organisms. These foods usually require refrigeration.

Critical Control Point (CCP)

A step in the process where control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level.

Critical Limit

A monitored criterion which separates the acceptable from the unacceptable.

Event

Any activity funded by the university that includes the supply or sale of food and/or drinks to any number of people in attendance.

Third-Party Catering Provider

A food business appointed to provide food or drink that the university does not directly operate.

6. Roles and Responsibilities

General roles and responsibilities for health and safety are defined in the university Health and Safety Management Policy. Those specific responsibilities relating to food safety are detailed below and are in addition.

Head of Hospitality

- Has overall responsibility for the implementation and management of this policy within catering and conferencing
- Ensure all necessary checks and training have been completed at the relevant times
- Provide the necessary management and support to ensure that all food safety within the control of the Head of Hospitality is undertaken and reported to senior management

Catering & Events Manager

- Has responsibility for ensuring all necessary reporting is carried out and reported to the Head of Hospitality - any issues or concerns are to be notified to the Head of Hospitality
- Areas are kept safe and any issues are made safe and remedied
- All catering staff training is undertaken and recorded

Property & Facilities Catering, Hospitality and Conferencing will:

- Be familiar with the requirements of the Food Safety Policy
- Undertake the necessary checks to ensure all legislative requirements are being met
- Provide competent advice and support on food safety to the university

- Will undertake checks and approve the use of third-party catering providers
- Allocate sufficient resources to the management of food safety
- Seek assurance that:
 - Legislation governing the sale of food and food hygiene is being met
 - Suitable management systems are in place to identify, evaluate and control hazards that are significant for food safety
 - All food sales areas operated by the university are registered with the appropriate local authority
 - All third-party catering providers using the university premises are registered and checked by the university for their undertaking
 - Those with responsibilities for food safety and hygiene are trained and competent
 - There are suitable systems in place for monitoring and recording food safety
 - Emergency procedures are in place as required
 - Food safety incidents are reported and investigated accordingly
- Ensure they are provided with reports on the university's food safety performance and monitoring outcomes
- Be notified of any significant incident or non-conformance relating to food safety
- Keep up to date records and make these available to the Health & Safety Team for auditing purposes, to include:
 - Food safety training
 - Inspections completed by food safety enforcement officers
 - Food safety incidents and investigations
 - Investigation findings following incidents and non-conformities
- Ensure appropriate oversight of food safety monitoring activity and provide compliance reports

Schools, Services and ENSA will:

- Be familiar with the requirements of the Food Safety Policy
- Will undertake checks and approve the use of third-party catering providers
- Seek assurance that all third-party catering providers using the university premises are registered and checked by the university for their undertaking
- Ensure that food safety incidents are reported and investigated accordingly
- Be notified of any significant incident or non-conformance relating to food safety

University Health & Safety Team will:

- Provide and keep updated policies, arrangements and guidance for those dealing with food sales to ensure any statutory requirements for food safety are met
- Audit to ensure compliance with this policy

All Food Handlers will:

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

7. Food Safety Arrangements

University policies establish standards and expectations for health and safety across the organisation and set the minimum requirements. This policy covers safe and effective food safety management across all university catering outlets. Property & Facilities Catering should develop, implement and maintain a food safety management system based on the seven principles of Hazard Analysis and Critical Control Points (HACCP).

Hazard Analysis and Critical Control Points (HACCP)

Property & Facilities Catering shall implement and maintain a food safety management system based on the HACCP principles, which identifies, evaluates, and controls hazards which are significant for food safety. The food safety management system will be developed, implemented, and maintained in accordance with the following seven HACCP principles:

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

General Hygiene Requirements

Property & Facilities Catering conducting any stage of production, processing, and distribution of food under their control shall comply with the general hygiene requirements laid out in Annex II of Regulation (EC) No 853/2004, which specifies the requirements governing:

- Layout, design, and construction of food premises
- Provision of sanitary facilities
- Design and construction of equipment
- Maintenance of premises and equipment
- Transportation of foodstuffs
- Cleansing and disinfection of food premises and equipment
- Food waste
- Pest control
- The delivery and handling of raw materials and ingredients
- Food storage
- Temperature controls during storage, cooking, processing, cooling, reheating, thawing, preparation, and distribution
- Protection, covering and packaging of food
- Personal hygiene
- Training and education of food handlers

8. Food Business Registration

The university shall ensure all necessary registry of the food business with the local authority at least 28 days before opening. The university must notify the local authority of any significant changes in activity and closure of existing premises. Premises used to supply, sell, or provide food on an occasional and small-scale basis at a community or charity event may be exempt from registration.

Principles governing the provision of food for events

The fundamental principles governing the provision of food for events on university campuses are:

1. Contact Property & Facilities Catering team to cater for events
2. Where a School, Service or ENSA choose self-catering for the provision of food for an event, they must contact Property & Facilities for advice on the event

Specific requirements are detailed below and are in addition.

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

Level 1 Food safety	Handle low-risk or prepacked foods or those not directly involved in preparing, processing or handling high-risk foods	Catering Assistants, Kitchen Porters, Senior Catering Assistant, Catering Team Lead
Level 2 Food safety	Prepare, process, or handle high-risk foods	Chef
Level 3 Food safety	Supervise or manage food preparation, processing, and handling activities	Chef, Senior Catering Assistant, Catering Team Lead
Level 4 Food safety	Are involved in developing and maintaining the FSMS and applying the HACCP principles	Chef, Catering Team Lead, Catering & Events Manager

9. Alcohol Sales

All alcohol sales must have a relevant license in place prior to any supply and sales.

An occasional licence allows the sale of alcohol within unlicensed premises at an event or special occasion. Selling alcohol without a licence is a criminal offence and can result in a fine of up to £20,000 or a prison sentence of up to 6 months, or both. The cost of an occasional licence is £10.

[Scottish Government - Occasional Licences](#)
[Gov.uk – apply for occasional licence](#)

10. Monitoring and Inspection

The university policy is to monitor, inspect and record all areas to ensure high health and safety standards are maintained.

11. Emergency Procedures

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

Typically, a catering outlet will be notified of a suspected case of food poisoning when:

- Persons complain that they were unwell after purchasing food from, or eating at, the premises. The complainant or their GP may contact the local authority Food Standards Scotland directly, who will inform the university.
- People attending an event begin to vomit whilst on the premises.
- Food handlers report that they are suffering from diarrhoea and/or vomiting.

Immediately upon becoming aware of a suspected food poisoning outbreak, the catering outlet should:

- Make enquiries to find out which food or meals were implicated.
- Stop serving food and suspend all food operations from the food premises concerned.
- Retain any remaining food and its original packaging that may be needed to trace the causative agent.
- Notify the local authority Food Standards Scotland who will conduct a preliminary investigation to determine the required response level.
- Do not clean the premises until bacteriological specimens have been collected if deemed necessary by Food Standards Scotland.
- Prepare a relevant menu list and, as far as possible, details of food processing (when purchased, storage temperature, method of cooking, cooling, reheating, or processing and HACCP monitoring records).
- If possible, make a complete list of people who consumed the suspected food, including their contact details.
- Prepare a list of food handlers and other staff, especially those involved with the suspect food. Absent staff should be included and the reason for the absence should be noted.
- Prepare a list of suppliers and details of the ingredients purchased, dates delivered and delivery records.
- Provide all information and records requested by Food Standards Scotland during their investigation and follow their instruction and guidance.
- Analyse the results of Food Standards Scotland investigations and implement any remedial actions.

12. Incident Reporting

The university policy requires all incidents to be reported, appropriately investigated and suitable remedial actions implemented to prevent reoccurrence. Specific requirements for the reporting of food safety incidents are detailed below and are in addition.

A food incident occurs when injury or illness is actually, or suspected to be, linked to food delivered to or supplied by the university. **All food incidents**, as defined above, must be reported using the university's Health & Safety [incident reporting form](#) and investigated by the Health & Safety Team.

The objectives of the investigation are to:

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