



Policy Level	
	Trust
Date of Approval	June 2022
Author	Shared Services Committee
Date of Next Review	June 2024

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## 1. Summary

This policy sets out the expectations of management, hygiene and safety for foods provided and consumed in our schools. This includes before, during and after school and on school trips and extracurricular events.

Each individual school has its own unique situation around the provision of food to its pupils and this is recognised. The Beckmead Trust actively supports food safety in all aspects of food handling within the Trust schools. This Food Management Policy is an overarching guide that should be applied across all sites as each individual school within The Beckmead Trust will be required to produce their own individual Food Management policy based on this guidance. Schools should also follow the Food Standards Safer Food and Better Business programme (SFBB) for HACCP Hazard control and safe measures which are incorporated in this policy. Any changes in legislation should be implemented with immediate effect.

# 2. Introduction - managing food safety & hygiene in schools

All schools within The Beckmead Trust (and any catering contractors used) must comply with current food safety laws and adopt good hygiene practices around food handling. If they do not, it increases the risk of contamination and can make food unsafe. Contaminated food can make pupils, staff and visitors ill, cause injuries and may even be life-threatening in some cases.

Poor hygiene and unsafe practices, such as not cooking or chilling high-risk food sufficiently, and cross-contamination, can cause food poisoning. Food poisoning is a notifiable disease under the Public Health (Control of Disease) Act 1984 so GP's are obliged to report cases.

This policy is to assist schools to manage the food safety requirements relating to the range of activities involving food that are operated and managed by schools themselves.

Examples of activities involving food for which the school has responsibility may include:lunches, breakfast or after school clubs, cooking clubs, reward activities, cake sales,food tech, parties/discos, and events such fetes, barbeques, quiz nights etc.

It does not cover those catering activities that are contracted out to 3rd party food businesses but it is expected that schools check the registration, insurance, policies and procedures that 3rd parties companies operate under to ensure they are compliant with current legislation.

Allergen products coming into contact with allergen-free ones can result in severe allergic reactions in some people. Physical contaminants can injure the mouth and cause choking. Unsafe food is an even greater risk for those vulnerable, such as younger children, older people, pregnant women, allergy sufferers and individuals with existing illnesses and weakened immune systems.

All schools are inspected as part of the Food Hygiene Rating Scheme (FHRS)https://www.food.gov.uk/safety-hygiene/food-hygiene-rating-scheme.

If a school has poor food safety and hygiene standards, its food hygiene rating score is likely to



be lower. Non-compliance with food safety standards can also result in enforcement action, loss of registration and poor Ofsted ratings.

### 3. National Guidance

The following food hygiene legislation applies to schools. All schools must comply with current food safety and hygiene legislation.

The main laws are:

• The Food Safety Act (FAS) 1990 - provides a framework for food safety legislation in Great Britain (England, Wales & Scotland). It covers food safety, consumer protection, food information etc. However, it is generally accepted that school food technology rooms producing food for personal or home consumption are similarly exempt.

It should be noted, however, that the definition of 'selling' food under the Act includes the supply of food provided it is in the course of a business, whether for profit or not, for example:

- food given as prizes in competitions
- food regularly made and sold for fundraising
- food prepared for school events, even where it is given and not sold
- any sort of 'enterprise' activities
- food prepared for school visits, residential activities etc
- production of tuck shop food
- storage/sale of food ingredients for classroom use.

Activities covered by the Food Safety Act would also be required to comply with specific food regulations, such as the Food Hygiene (Amendment) Regulations 1990, the Food Labelling (Amendment) Regulations 1990 and the Food Premises (Registration) Regulations 1991.

## 4. Other relevant legislation

The Health and Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations 1999 impose general duties on employers to ensure the health and safety of employees and others. In addition, the Workplace (Health, Safety and Welfare) Regulations 1992 give rise to specific requirements in relation to standards for hygiene and cleanliness in areas where food is prepared and eaten.

Employers must also comply with **Hazardous to Health (COSHH) Regulations**. They must carry out an assessment of all substances hazardous to health, then remove them or provide appropriate control measures so that they do not pose a risk. In the context of food safety, bacterial and/or

viral agents could certainly be considered as 'substances hazardous to health'. Further examples would include: detergents, disinfectants, cleaning materials, chemicals used in food tests, yeasts and yoghurt bacteria. Schools are therefore required to ensure they have a current and uptodate COSHH registers for food areas with each substance risk assessed and data sheets available.

The **Provision and Use of Equipment Regulations 1992** places a duty on employers to ensure that work equipment is appropriate for its intended use, safe, and adequately maintained. A number of items of equipment used in school kitchen areas or food technology rooms pose potential risks to users, who should have received appropriate information and training at the outset.

The Pressure Systems and Transportable Gas Containers Regulations 1988 contains specific



requirements on inspection, servicing and maintenance of pressure cookers.

The **Gas Safety (Installation and Use) Regulations 1998** requires gas appliances to be properly installed and subsequently fully serviced by a Gas Safe registered engineer. Gas appliances should be sited where there is adequate ventilation. It is unlawful to use any gas appliance which is known, or suspected, to be unsafe.

Further regulations which have a bearing on food preparation in schools are:

- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 requiring employers to notify the Health & Safety Executive (HSE) immediately in the event of an accident resulting in death, major injury or injury causing absence from work for more than seven days.
- The **Electricity at Work Regulations 1989** involves the safe installation and maintenance of electrical equipment to prevent risk of electric shock, burn or fire/explosion from electricity. Note: in addition to the provisions of these regulations, microwave ovens should be tested every six months for microwave radiation leakage and other hazards.
- The **Health and Safety (First Aid) Regulations 1981** place a duty on employers to provide adequate first aid arrangements in the workplace.
- The Manual Handling Operations Regulations 1992 covers all manual handling operations which may cause injury in the workplace, and how to address such risks through risk assessments and suitable control measures
- The **Safety Representatives and Safety Committees Regulations 1977**, provides for the appointment and functions of safety representatives from recognised trade unions, setting out the employer's obligations to them, and the circumstances in which safety committees must be established.

- The Food Safety & Hygiene (England) Regulation 2013. Created under the FSA 1990. These regulations cover the enforcement of food hygiene and the HACCP principles from Regulation (EC) 852/2004 (retained EU law). There are different regulations for each UK country.
- The Food Information Regulations 2014 placed duties on food businesses to provide information to consumers on allergens. These regulations were amended by the Food Information (Amendment) (England) Regulations 2019 to include Natasha's Law which came into force on 1st October 2021
- Schools must comply with the legal requirements under The Food Hygiene (England)
   Regulations 2006 by following the 3 requirements of registration, training in Food Hygiene and Food Safety Management.

## 5. Registration

Each school within the Trust is required to register their food activities with their local authority and submit documentation into the Trust Estates & Compliance Office.

Registration is a legal requirement if the school is operating one or more food activities/operations



(eg. breakfast club, school BBQ & social events, cooking club,etc). The school and business operator must register with the local authority using the Registration Application Form.

(Lunch time school meals provided by a contractor are registered

separately). Completing the form:

- The name of the school is sufficient for the 'trading name of food business' and
- The 'food business operator(s)' are those ultimately responsible in the school (usually the Headteacher or chair of governors, or both).
- The 'type of food activity' should be ticked as 'school'
- The relevant food activities taking place should be specified in the separate box on the back of the form

Food activities may be organised or managed by several different people. This may include teachers or other staff, school nurses, parents/ carers, other volunteers, etc. If someone is given delegated authority to oversee all food related activities/issues in the school. Details should be given on the reverse of the form.

# 6. Training in Food Safety and Hygiene

Employers are responsible for staff hygiene training. Training can be a formal programme or informal training, such as on the job training or self study.

Current legislation requires that every person who handles food must hold a Food Safety and Hygiene certification so they know how to prepare food that is safe to eat. The level of certification required by law depends on how much involvement they have in the process of food preparation as some roles require a more comprehensive understanding and therefore higher level of training.

For schools within The Beckmead Trust, the requirement, based on interpretation of good practice guidance, is for a minimum of formal training equivalent to the Level 2 certificate in food safety. This certificate can be obtained through completing training courses provided by an accredited body. See Appendix 2 for examples of companies offering this training.

# 7. Refresher training

The Beckmead Trust requires refresher food safety training is completed every 3 years or sooner if there are any significant statutory changes or performance issues.

The 'operator', or main delegated person managing/overseeing food activities should complete training in implementation of the schools food safety management system and Safer Food Better Business (SFBB). This will help embed practice around safer food handling. To achieve this any food handling leads would be expected to complete Level 3 Food Safety training.

The 'operator', or delegated person managing food safety, should also make an assessment of the



training needs of those involved in providing each particular food activity, ensuring that they are competent in operating food safety procedures. This could include parents, staff, or others.

Any 'training' given should be recorded on record sheets (included in the SFBB pack). For example, for parents providing low risk food for school events, appropriate 'training' could take the form of providing them with some appropriate information such as the Food Standards Agency booklet "Catering from Home Safely", available on their website and requesting that they appreciate the importance of following the guidance given.

## 8. Allergen Training

The Beckmead Trust also requires anyone handling food within the schools to undertake the Food Standards Allergen training with refresher training every 3 years

or soon if there are any significant changes or as required as part of performance issues. See Appendix 2

### **Actions**

 Staff are required to send all certificates or confirmation of training to their line manager for submission to your HR file and to support compliance evidence.

## 9. Staff, PPE, & Personal Hygiene

To keep food safe, every person working in a food-handling area must maintain a high level of personal hygiene.

They must wear clothing that is:

- suitable
- clean
- protective

When preparing or handling food they should:

- keep hair tied back and wear a suitable head covering, e.g. hat or hair net
- not wear watches or jewellery (except a wedding band)
- not touch their face and hair, smoke, spit, sneeze, eat or chew gum You can find more information on <u>personal hygiene</u> in our Safer food, better business for caterers pack.

## 10. Handwashing

Effective handwashing is extremely important to help prevent harmful bacteria from spreading from peoples' hands. All staff that work with food must wash their hands:

- when in the kitchen or preparation area
- before preparing food



- after touching raw food
- after handling food waste or emptying a bin
- after cleaning
- after blowing their nose
- after touching phones, light switches, door handles and cash registers

Staff should dry their hands on a disposable towel. This is because harmful bacteria can spread on wet or damp hands. Use a disposable towel to turn off the tap.

## 11. Staff Fitness for work

You must not allow anyone to handle food or enter a food handling area if they:

- are suffering from or carrying a disease likely to be transmitted through food
- have infected wounds, skin infections or sores
- have diarrhoea

If any of these apply to a member of staff, they must tell their manager about it immediately.

Staff with diarrhoea or vomiting should not return to work until they have had no symptoms for 48 hours.

The guidance below applies to all UK food business operators other than primary producers, such as farmers and growers.

Further guidance can be found here

https://www.food.gov.uk/sites/default/files/media/document/fitnesstoworkguide.p.df

#### **Actions:**

- Staff 'in charge' of food related activities ie Schools cooks and Food Tech Teachers, Class
  Teachers must follow these requirements must ensure these standards are maintained in
  their work areas
- These guidelines also apply to any staff attending to support lessons.
- Share FSA hand washing tutorial via as part to support personal hygiene and food safety https://youtu.be/cCpr11OuYKI

# 12. Food Safety Management System (FSMS)

Schools can comply with the legal requirement of having a FSMS by making full use of the Food Standard Agency's Safer Food Better Business (SFBB) pack for Caterers. The Beckmead Trust endorses this - the pack will need to be adapted to your own setting and local requirements.

Full details of SFBB can be found on the Food Standards Agency website



http://www.food.gov.uk/foodindustry/regulation/hygleg/hyglegresources/sfbb/ Managing Food Safety.

The pack cover relevant SFBB safe methods cover including:-

- Personal Hygiene
- Allergies
- Clear & Clean as you go
- Foods that Need Extra Care
- Opening & Closing Checks
- Training & Supervision (including volunteers)
- High risk which includes foods containing meat, fish, raw egg.
- Additional relevant SFBB safe methods:- Separating Foods Chilled Storage Cleaning Effectively Cooking Safely Chilling Down Hot Food Prove It
- Food Safety Management; BBQ'S / Hog Roasts Cooking meat (especially burgers, chicken, and sausages) on a BBQ is a high risk activity.

## **Actions**

Download and set up and follow the Safer Foods, Better Business Procedures for your school

# 13. Food safety

In every step of food preparation, follow the four guidelines to keep food safe:

- Clean—Wash hands and surfaces often.
- Separate—Don't cross-contaminate.
- Cook—Cook to proper temperatures, checking with a food thermometer.
- Chill—Refrigerate promptly.

### How can we ensure food safety in schools?

- 1. Protecting foods from insects, rodents, and other animals.
- 2. Helping to treat health problems and preventing them.
- 3. Storing food in a safe place.
- 4. Building schools away from major breeding sites.

## If your schools deals in food you must:

- make sure food is <u>safe to eat</u>
- make sure you don't add, remove or treat food in a way that makes it harmful to eat
- make sure the food is the same quality that you say it is



- make sure you don't mislead people by the way food is labelled, advertised or marketed
- keep records on where you got food from and show this information

on

demand - known as 'traceability' (PDF, 90KB)

- withdraw unsafe food and complete an incident report
- tell people why food has been withdrawn or recalled, for example by using a
- leaflet or poster
- display your food hygiene rating (if you sell food direct to the public)

### **Actions:**

Schools should ensure procedures are in place to action the above and audit regularly
to ensure compliance. Any issues should be recorded and reported immediately to the
Head Teacher and Trust Estates & Compliance Lead

### 14. Food additives

If you use an additive in food you must:

- only use an <u>approved additive</u>
- only use it if it is approved for use in that food

The food additive must not exceed the <u>maximum permitted level</u>.

# 15. Food hygiene

Part of complying with food safety is managing <u>food hygiene</u>.

You usually have to write a plan based on the <u>HACCP (Hazard Analysis and Critical Control Point principles</u> if you run a food business. This keeps your food safe from biological, chemical and physical safety hazards. Following the Safe Food Better Business (SFBB) programme covers this.

### **Actions:**

- Implement actions based on SFBB
- Train all staff involved in any food handling to a minimum of Level 2, refreshed every 3 years.

# Making a HACCP food plan

To make a plan you must:

- identify any hazards that must be avoided, removed or reduced
- identify the critical control points (CCPs) the points when you need to prevent, remove or reduce a hazard in your work process
- set limits for the CCPs
- make sure you monitor the CCPs
- put things right if there is a problem with a CCP
- put checks in place to make sure your plan is working
- keep records



## 17. Food contact materials

Materials and packaging that can be reasonably expected to come into contact with food are called 'food contact materials'. These can include:

- packaging
- food processing equipment
- cookware
- work surfaces

## 18. To keep food safe for consumption:

- make sure food contact materials don't transfer anything to food they touch
- make sure food contact materials don't change the food they touch
- when inspected, be able to show where the food contact materials came from

## 19. Bacteria and food poisoning

To keep food safe from bacteria, you should follow HACCP (SFBB). Bacteria that cause serious health problems are:

- E.coli O157 and campylobacter
- salmonella, especially with the storage and handling of eggs

## 20. Food allergies

https://www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesse s

A list of the 14 main allergens can be found here:

https://docs.google.com/document/d/18Om9mrAvjw0evHR4ICtGsj4RgTcmmaqwydVTJWAarFM/e d it#heading=h.zbfz2ftb613c

## 21. Allergen checklist for managers/leads

- Have you made clear to the team, who has overall responsibility for allergen management?
- Is a responsible member of staff available on each shift/lunch break to manage queries around allergies?
- If you use a sign requesting customers ask about allergens, is this displayed prominently in a place where customers make their food choices? The Food Standards Agency has an <u>allergy and intolerance sign</u> which you can display.
- Are staff clear on how to avoid allergen cross-contamination?
- Do kitchen staff know how to record allergens when recipes are changed?
- Are there procedures in place when ingredients are delivered, to verify that you have received the items you have ordered?



- If there are any changes to the ingredients in your regular order (for example substitutions), do you have a procedure in place to approve and record this?
- Are there clear instructions in place for the cleaning of premises, equipment and work tools?
- Do you have a process of informing cover staff in food service of any allergies for pupils, staff and visitors.

#### **Actions:**

- At each school every menu dish must be checked and allergens published prior to going live. Appendix 4
- Each school must maintain an uptodate recipe list for each dish on the school menu to ensure consistency of content in the event of temporary cover.
- The following signage must be displayed in classrooms, reception
- Parents are informed of the policy when their child starts school and are discouraged from bringing nuts or food containing nuts into school.
- Nut Free School notices are displayed throughout the school in key areas
- Staff are advised of the Nut Free policy relating to foods brought into school ie snacks and lunches.
- Food allergy and intolerance Individual care plans must be created for children with food allergies.
- Staff must declare food allergies and intolerance at the start of their employment or when this arises. A record form must be completed and returned to HR and line managers advised.

# 22. Special Dietary Requirements

The school provides food in accordance with pupils' religious beliefs and cultural practices as required. School caterers offer a vegetarian option at lunch every day. We recognise that some pupils may require special diets that do not allow for our food policy to be exactly met.

#### **Actions:**

- Allergy information must be provided with all school menus.
- Parents should be asked to inform school of any special dietary requirements which cannot be met by food provided in the normal school day.
- Individual care plans need to be created for pupils with special dietary
  needs/requirements. These should document symptoms and adverse reactions, actions
  to be taken in an emergency and emergency contact details, along with any
  particular food requirements e.g. for high-energy diets. School caterers are made
  aware of any food allergies/food intolerance/medical diets and requests for these diets
  are submitted according to an agreed process.
- Pupil's food allergies are shared in a sensitive way and maintained by the school. This
  information must be shared with the kitchen manager and shared with all relevant
  catering staff. Teachers and Teaching Assistants should be aware of pupil allergies in
  their classrooms.
- Staff must ensure they also make The School aware of any allergies they may have.



### 23. Visits and Residentials

Any meals taken as part of on or off school site residentials will provide a balanced and healthy approach to meals and where possible schools should look to use off site providers that comply with the National Food Standards.

### 24. Nurture or reward activities around food

The guidelines around food and allergy management apply to foods provided during nurture and reward activities.

### **25.** LETS

In addition, schools may 'let' their kitchen facilities. In these instances legally, schools retain responsibility for ensuring that food hygiene standards are met in these situations.

#### **Actions:**

 Schools should ensure their T&C's include food hygiene practices for anyone hiring the premises.

# 26. Food inspections

Schools can be inspected by their local council at any point in the food production and distribution process. All inspectors must follow the <u>Food Law Code</u> of <u>Practice</u>. Schools will not be told in advance an inspection is going to happen.

How often you're inspected depends on the risk your business poses to public health.

If you're a <u>food retailer</u> or <u>caterer</u> you will be inspected on a more regular basis to make sure you are adhering to the correct standards.

## Actions:

- In the event of an inspection please ensure your Headteacher is aware immediately and the Estates and Compliance Lead contacted.
- Copies of all documentation must be emailed to The Trust Estates and Compliance Lead immediately.

# 27. Frequency of inspections

A new rating is given each time a business is inspected by a food safety officer from the business's local authority.

Your premises, food, records and procedures can be inspected. Food samples can be taken as well as photographed.

Further information around inspections can be found here. <a href="https://www.food.gov.uk/safety-hygiene/food-hygiene-rating-scheme#frequency-of-inspections">https://www.food.gov.uk/safety-hygiene/food-hygiene-rating-scheme#frequency-of-inspections</a>

Further information around the rating given after an inspection can be found here. <a href="https://cpdonline.co.uk/knowledge-base/food-hygiene/food-hygiene-rating-scheme/">https://cpdonline.co.uk/knowledge-base/food-hygiene/food-hygiene-rating-scheme/</a>



## 28. After inspection

You'll be sent a letter confirming any improvements you need to make and by when. Usually, you're responsible for confirming these

improvements have been made.

For serious food safety problems you may be sent a 'notice'. The notice can include banning you from using certain equipment or processes until improvements have been made. Your school will be revisited to make sure you have followed the improvements in the notice. Example notices include a:

- Hygiene Improvement Notice
- Hygiene Emergency Prohibition Notices banning you from using certain equipment or following certain processes

# 29. Inspection Appeals

Your letter or notice should tell you how you can appeal a decision by an inspector.

## 30. Reporting a food safety incident

### Actions:

- In the first instance if you feel there is an issue around food safety in your setting you must speak to your line manager. In their absence please speak to your Headteacher who will discuss and advise the Food Standards Agency (FSA). The FSA will advise if the food must be withdrawn and returned.
- The Trust Estate & Compliance Office must be advised of all food safety incidents and a copy of the all food safety incident reports submitted to the Estates & Compliance Office.T

Submit a food safety incident report.

FSA food incidents helpline - Telephone: 020 7276 8448

#### 31. Risk assessments

Schools, as employers, have a legal duty to carry out suitable and sufficient risk assessments in accordance with Management of Health and Safety at Work Regulations in order to minimise the risks involved in food and nutrition lessons and activities at school.

It is essential that risk assessments are undertaken for recipes/activities, processes/procedures and specialist equipment. Risk assessments are formal activities and should follow five stages. They should be completed by a 'competent' member of staff and reviewed and updated regularly.T

The five stages of risk assessment are:

- 1. look for the hazards:
- 2. decide who might be harmed and how;
- 3. evaluate the risks and decide whether the existing precautions are adequate or whether more should be done;
- 4. record your findings;



5. review your assessment and revise it if necessary. Actions

A risk assessment for each aspect of food handling and its associated risks must be undertaken by each school setting and reviewed

annually.

# 32. Record keeping – part of due diligence

It is important to keep a food hygiene and safety file in the food room with the following up to date documents:

- daily fridge/freezer temperature record sheets; (see Attachments) for daily record sheet
- risk assessments;
- cleaning schedules;
- COSHH record sheets (where appropriate);
- a list of pupil's special dietary requirements, especially allergies;
- food hygiene and safety training certificates;
- departmental food policies/letters to parents, e.g. provision of ingredients/storage of ingredients/food at school

### **Actions:**

Schools should check above documents are in place and completed

### 33. Food Waste & Pest Control

Each school is required to contract pest control and refuse collection services for their site and maintain cleaning standards to support good hygiene

#### **Actions:**

- Thorough & daily cleaning and sanitising of all areas with food ie kitchen, food tech rooms, staff rooms
- Food stored safety where needed in classrooms
- Fridges cleaned weekly and checked for out of date food regularly.
- Food & general waste bins emptied daily. SLA in place for food waste
- SLA in place for pest control.
- SLA in place for pest control across the sites
- Cleaning cloths ie dish cloths, teacloths washed and sponges replaced regularly



## Appendix 1 - Food Standards Agency - Food Safety Checklist

https://www.food.gov.uk/sites/default/files/media/document/food-safety-checklist\_pdf

Use to check your sites is maintaining the required standards in between inspections.

## Appendix 2 -Examples of Online Food Safety Training Providers

Food Safety Coaching videos are available on the Food Standards Agency YouTube channel (FREE) <a href="https://www.youtube.com/watch?v=211BwnwDESc&list=PL43290765924EDEAE">https://www.youtube.com/watch?v=211BwnwDESc&list=PL43290765924EDEAE</a>

Food Standards Agency Training Courses (FREE) <a href="https://www.food.gov.uk/business-guidance/online-food-safety-training">https://www.food.gov.uk/business-guidance/online-food-safety-training</a>

Food standards Agency - Allergen training (FREE) https://allergytraining.food.gov.uk/

High Speed Training https://www.highspeedtraining.co.uk/courses/food-hygiene/

Royal Society for Public Health <a href="https://www.rsph.org.uk/qualifications.html#eLearning">https://www.rsph.org.uk/qualifications.html#eLearning</a>

### Virtual College

https://www.virtual-college.co.uk/courses/search?categories\_string\_mv=Food%20and%20Drink&q=food%20safety%20

Hazard Analysis and Critical Control Point (HACCP)

https://www.highspeedtraining.co.uk/courses/haccp/

## Appendix 3 - Allergen Poster

https://docs.google.com/document/d/18Om9mrAvjw0evHR4lCtGsj4RgTcmmaqwydVTJWAarFM/edit#heading=h.zbfz2ftb613c4



# Appendix 4 - Daily checksheet for kitchen and food tech rooms

https://docs.google.com/document/d/1Kwn09c4 5CfzYlgyX-4qDgFCshslXEY/edi

## Appendix 5 - Kitchen & food tech room cleaning schedule

https://docs.google.com/document/d/1rLobSFUgGbyjr3gEkZtbXGVL1qdmxakD/ed