

Food Alert

LIVERPOOL UNIVERSITY FOOD SAFETY POLICY 2022

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1: LIVERPOOL UNIVERSITY - FOOD SAFETY POLICY



2022

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Aims

- To provide the company with a policy statement regarding food safety.
- To specify the responsible persons for the different areas of food safety.
- To provide a framework for compliance with Regulation (EC) 852/2004 and The Food Safety and Hygiene (England) Regulations 2013.
- Describe the document structure and control system.

Contents

1.1: Food Safety Policy statement.

1.2: Responsibilities of persons accountable for the different areas of food safety.

1.3: Document control system

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1.1: Food Safety Policy Statement

Our policy is to provide our customers (students, staff and visitors) with food that is safe and of the highest quality; meeting their needs nutritionally and as far as we are able to their dietary requirements.

Our Food Safety Management System based on the principles of Hazard Analysis Critical Control Points (HACCP) has been developed and implemented to help us achieve our policy.

We recognise that our staff play an integral part in the production of safe, clean food and we provide them with the information, instruction, training and supervision required for this purpose.

As an organisation we strive to build a strong food safety culture, providing the necessary resources to support this. The management team at the University of Liverpool are committed to food safety and all staff are required to abide by the policy and food safety management procedures.

The responsibilities for food safety are important and the particular arrangements that we have in place to implement the Food Safety Management System are set out in this policy and the food safety manual.

This policy will be reviewed and re-signed annually to ensure it is kept up to date, and that it continues to reflect the business changes in nature, size and operations.

Signed	
Name	
Position	
Date	
Review date	

1.2: Responsibilities

Directors and senior operations managers

- Ensuring adequate resources (human, financial and equipment) are made available to secure high standards of food safety.
- Establishing a food safety culture.

Site Managers/Supervisors

- Having an understanding of the HACCP system (including allergens).
- Ensuring all members of staff detailed in the policy are aware of their responsibilities.
- Displaying a copy of the general statement of food safety policy on the staff notice board.
- Ensuring managers attend food safety training as required by company policy.
- Allowing managers and staff to have sufficient time to complete their duties in respect of food safety.
- Ensuring suitable pest control is in place and action is taken, monitored and recorded following any signs of pest activity (it is strongly recommended that an external company is employed to manage pest control).
- Making suitable arrangements for clean protective clothing for kitchen and front-of-house staff.
- Liaising with the Environmental Health Officer, when appropriate.
- Handling alleged food poisoning cases and food complaints.
- Ensuring food suppliers are approved in respect of food safety.

Senior Chef

- Personalising the HACCP system/documentation in conjunction with Food Alert and appropriate persons.
- Ensuring effective implementation of the HACCP system.
- Reviewing the HACCP when new menus, equipment or processes are introduced.
- Ensuring the Critical Control Points (CCPs) as identified in the HACCP are being monitored.
- Ensuring food handlers receive the training required in any CCPs that they are responsible for.
- Liaising with the Environmental Health Officer/taking charge of alleged food poisoning cases and food complaints when the Catering Manager is not available.
- Recording information on food allergens found in ingredients and making that information available to customers through the front-of-house team.
- Ensuring any food handlers who report illness are excluded as appropriate in line with the personal hygiene policy.

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- Carrying out bi-annual inspections of the premises and recording, monitoring and completing the remedial actions identified.
- Ensuring all food handlers have attended food hygiene training as required by legislation.
- Ensuring cleaning schedules are prepared and implemented to maintain a high degree of cleanliness throughout the food handling areas.

Sous/Assistant Chefs

- Ensuring effective implementation of the HACCP system.
- Ensuring the Critical Control Points (CCPs) as identified in the HACCP are being monitored.
- Ensuring cleaning schedules are implemented to maintain a high degree of cleanliness throughout the food handling areas.
- As per the Head Chef responsibilities, in their absence.

Front-of-House (assistant) Manager/Team Leaders

- Ensuring the food safety standards of front-of-house staff.
- Providing training to front-of-house staff on the handling of enquiries about allergens.

Food handlers, servery staff and kitchen porters

- Meeting the standards laid down in the Essentials of Food Hygiene induction notes.
- Attending further food hygiene and Allergen training as requested by their Line Manager.
- Adhering to the food safety procedures and carrying out any monitoring or recording of CCPs as instructed.
- Providing accurate information to customers regarding food allergens upon request.
- Reporting to their Line Manager if they are suffering from diarrhoea and/or vomiting.
- Reporting any concerns regarding food safety, including any signs of pest activity.
- Co-operating with their line manager regarding the implementation of HACCP.

1.3: Document Control.

Controlled documents:

The **Campus Operations Manager** maintains a system to control all documents relating to food safety. This ensures that there is one source of current documentation, which can be tracked.

This includes but is not limited to:

- Policy and HACCP documents
- Specifications and recipes.
- Procedures.
- Records formats.

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The “controlled document” is:

- Held on Commercial Services SharePoint file.
- The printed versions are held in the Catering Manager’s/Assistant Manager’s offices.
- All other printed versions are uncontrolled documents.
- The document is trackable via the footer at the bottom of each page as below:

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Changes to the controlled document

Changes are made to a controlled document after sign-off by the:

- Campus Operations Manager
- Gail Cowin
- Food Alert consultant

Changes are tracked using Commercial Services **Document Review Tracker** form and:

- The hard/soft version of the controlled document must be updated
- The footer in the amended section is to be updated
- The hard/soft of any uncontrolled (in-use) document is replaced e.g. records formats.

Review of controlled documentation

All documents (in part or whole) are reviewed annually unless:

- Earlier review date is specified.
- When critical information changes:
 - Key personnel.
 - Major equipment changes.
 - Process changes.
 - Change of Supplier of chemical, raw materials, packaging.
 - New product.
 - Change of structure or layout.
- Complaints or non-conformance investigations require review.
- Legislation / Enforcing authorities require it.

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Specifications.

University of Liverpool maintains a system to collect specifications for supplied products, recipes and finished product which are adequate, accurate and regularly reviewed.

This is currently being moved to the **PROCURE WIZARD** system.

Specifications are also stored in on site file

Technical Data Sheets and COSHH assessments are collected for cleaning chemicals.

Raw materials/supplied foods,

A list of all approved suppliers is maintained by CENTRAL PROCUREMENT.

Food contact packaging/wrappings,

A list of all approved suppliers is maintained by CENTRAL PROCUREMENT.

Recipes

Recipes for each of the products produced can be found on SharePoint

Prepared food specifications

Prepared food specifications showing: the list of ingredients, method/recipe (see above), allergens and labelling/handling requirements (if applicable) can be found on the PROCURE WIZARD system.

Standard operating procedures (SOPs).

The Procedures are used to provide detail on how to do specific tasks or processes, they are:

- Clearly legible, easy to understand by staff.
- Indexed in SharePoint H&S file
- Easily accessible on computer/file.
- Subject to control and review as described earlier in this section.

Records.

Records completion and storage

Records are:

- Kept on approved forms **or** on approved digital formats.
- Completed by the appropriate personnel in pen or using a tablet or smart phone.
- Signed and dated (and timed if necessary):
 - Digital recording is via a personal login which is traceable.
- Mistakes are:
 - Crossed through with a single horizontal line.

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- Using an error code (see SOP on completing records).
- The correct entry written beside it and the change 'initialed' and dated.
- Changes to digital records are restricted to senior specified people.
- Stored in a safe, dry, pest proof environment and are identified for easy retrieval.
- Records will be kept for **12 Months** (*unless otherwise specified for individual records*) beyond their completion date.
- Records relating to personnel are kept for the duration of their employment – See further details: **HR Policy**.

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2: LIVERPOOL UNIVERSITY Pre-requisite Programs (PrP)



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- ii. Introduction
- iii. Management Implementation.

2. Prerequisites Programs.

- 2.1. Premises, design and layout.
- 2.2. Waste Management
- 2.3. Training and supervision.
- 2.4. Cleaning and disinfection.
- 2.5. Personal hygiene.
- 2.6. Approval of suppliers.
- 2.7. Contamination prevention (including E. coli)
- 2.8. Process Controls
- 2.9. Pest Control.
- 2.10. Stock control
- 2.11. Equipment & Maintenance
- 2.12. Product Conformity and labelling
- 2.13. Internal Delivery and transfers
- 2.14. Testing to support shelf-life & verification
- 2.15. Allergen policy (see separate policy & HACCP)
- 2.16. Acrylamide
- 2.17. Use of Fish
- 2.18. Vacuum Packing
- 2.19. Traceability
- 2.20. Use of GMOs
- 2.21. Verification processes
- 2.22. Complaints handling and food recalls
- 2.23. Standard Operating Procedure (SOP) index).

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ii. Introduction

Introduction

- There are some controls for food safety that are common in that they are required throughout our operation. They need to be in place before the HACCP-based controls specific to our business are implemented - they are prerequisites to HACCP.
- There are hazards that can occur at numerous steps in the process (not specific to one particular process step) or have the potential to occur across the operation. These are often controlled by prerequisite food hygiene requirements that are 'generic' (e.g. pest control, training, good hygiene practice).
- The control of these hazards is a pre-requirement to HACCP, the control mechanisms have thus been termed 'prerequisite programs'. The prerequisite programs are vital to ensure that the base environmental and operating conditions are appropriate and suitable for the preparation of safe food.
- Effective and strictly implemented prerequisite programs are a crucial part of the food safety management system and underpin the HACCP plan in this policy document.

iii. Management Implementation.

Table 1.0: Management Implementation.		
Action	Sign	Date completed
Read the pre-requisites		
Review and amend as necessary		
Ensure all controls described can be fulfilled		
Ensure all staff are made aware of the contents		
Train staff in the relevant Standard Operating Procedures / Work Instructions.		



2.1 Premises, Design and Layout.

- Adequate space is available.
- Adequate drainage, lighting and ventilation are present.
- The premises and equipment are easy to clean and are kept clean.
- The design and layout of the food handling areas minimises the risk of cross-contamination whenever possible. If necessary, time separation techniques are utilised.
- Adequate facilities are provided for cleaning and disinfection of equipment, food and hands - dishwashers, dedicated sinks and wash-hand basins have been installed.
- Suitable and adequate storage is provided for chemicals to minimise the risk of chemical contamination.
- Only food-grade (or suitable for food) equipment is used.
- Daily checks of the structure of premises and equipment are undertaken for signs of damage and deterioration to help prevent physical contamination of food by loose parts.
- The supply of hot water to general sinks is to achieve at least 50°C.
- Externally stored refuse is kept away from food areas and in covered bins.
- Premises are suitably pest-proofed and regularly monitored.
- Maintenance records are kept for dishwashers and refrigerators.

The following external contaminants are controlled by:

Potential External contaminant	Control
Pest infestations	<ul style="list-style-type: none"> • Pest control contract • Proofing of the unit and pest control measures in the adjoining Storage unit. • Covered refuse • Regular removal of refuse • Remove problem undergrowth
Dust/particular matter	<ul style="list-style-type: none"> • Doors/windows kept shut • Air conditioning filtered
Smell	<ul style="list-style-type: none"> • Doors/windows kept shut • Air conditioning
Fumes	<ul style="list-style-type: none"> • Doors/windows kept shut • Air conditioning filtered • Extraction system (for cooking fumes)
Floods from drainage	<ul style="list-style-type: none"> • Routine maintenance of drains
Litter	<ul style="list-style-type: none"> • Regular cleaning activities around the site.



Staff changing, welfare & washing facilities

- Appropriately located facilities are provided for hand washing.
- Only food-grade equipment is used.
- The supply of hot water at wash stations achieves a mixed temperature of 38-42°C to allow for effective handwashing.
- Each station is provided with anti-bacterial soap, disposable hand towel and hand sanitiser.
- Handwash sinks are knee, hip or elbow operated or staff are trained to turn taps off avoiding contamination.
- Sufficient toilets are provided for staff to allow compliance with the Workplace (Health, Safety and Welfare) Regulations 1992, these are:
 - Separated from the food handling areas.
 - Permitted for use only by staff.
 - Cleaned regularly.
- Sufficient space is allowed for staff to be able to change and to store their street clothes and personal effects away from the food handling areas.

Equipment cleaning facilities

- Adequate space is available.
- Adequate drainage, lighting and ventilation are present.
- Adequate facilities are provided for cleaning and disinfection of equipment, food and hands - dedicated sinks and wash-hand basins have been installed.
- Suitable provision is present for the draining and drying of equipment.
- Two sinks are provided for the washing of equipment (see cleaning SOPs).

Condition of building structure and services.

The premises and services shall be fit for purpose and be maintained to ensure product safety and legal compliance.

Floor

- Flooring in the food handling areas is a non-porous, cleanable and stable surface.

Walls

- Walls are surfaced to allow for cleaning & sanitising and avoidance of physical contamination.
- Surfaces, cladding, jointing and edging is checked regularly and repairs are planned appropriately.

Ceilings

- Ceilings are surfaced to allow for cleaning and sanitising.

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Windows

- Windows are checked regularly for damage.
- Damages are reported immediately and areas affected by breakages are quarantined until cleaned.

Doors

- Doors in food handling areas are appropriately painted/coated for cleanability and sanitising. They are subject to recorded checks.

Lighting

- Cleanable, covered lighting is provided in food handling areas to ensure even coverage of illumination.

Ventilation

The kitchens are mechanically ventilated via an external draw and a canopy with extraction system (over the cook line). These are:

- Checked and cleaned regularly.
- Serviced annually.
- There is separate ventilation for the staff toilets.
- Ventilation outlets and inlets are sufficiently separated to prevent cross contamination of air flows.

Water

- Clean, 'mains' water is used to ensure it, and any ice made from it, is safe to drink and acceptable for use in food preparation.

Sinks

Sinks are:

- Designated and signed where necessary (e.g. personal hygiene, food prep, cleaning).
- Provided with potable water (hot and cold).
- Made of stainless steel.
- Provided with appropriate tap fittings.

Drainage

- Internal floor drains (where present) with particulate traps are fitted in the kitchens, which are cleaned/emptied daily.
- The direction of flow is from clean areas to dirty areas:
 - Toilet drain is separate from the kitchen drains.
- External drains are regularly checked and cleared as needed.

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2.2: Waste management

- Effective waste management is important in preventing pest infestation.
- All waste and refuse in the kitchen are stored in liners and transferred to the storage area when full.
- Stored refuse is placed in a designated area away from food preparation areas and covered to prevent the attraction of pests and odour generation.
- Regular collections are made to remove the refuse.

2.3: Training & Supervision.

- Food handling staff are trained in food safety to ensure compliance with the law and to ensure a high standard of personal hygiene and safe food handling practices is maintained. Records are to be maintained.

Aims

- To document our policy in relation to food hygiene training of our staff and managers.
- To maintain records of the training that has been completed.

Contents

- Food hygiene training summary
- Recording of training
- Supervision

Forms

Form no.	Title	This section	Appendix One
FH Form 10.1	Summary of training		✓

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Training Summary

Position	Training	Duration	Within
All staff	Essentials of Food Hygiene <i>Includes allergens and E. coli controls</i>	Notes	Before commencing work
Server staff, porters, bar staff	Level 1 / Awareness (or equivalent)	2 hours	1 month
High-risk food handlers	Level 2 Award in Food Safety in Catering (or equivalent)	6 hours	3 months
Sous Chefs	Level 3 Award in Food Safety in Catering (or equivalent)	3 days	Ideally within 12 months
Head Chef	Level 4 Award in Food Safety in Catering (or equivalent)	5 days	Ideally within 12 months
High-risk food handlers	Refresher food hygiene training	1 hour	Annually
Those responsible for the development and maintenance of the food safety management system	HACCP training Level 3 or Level 4 training	1 day	Ideally within 12 months

Recording food hygiene training

We keep all training certificates within staff files.

A summary matrix of training is maintained using ***The H&S Annual Action Plan***

Supervision

All food handlers and in particular temporary staff are to be supervised by the Site Manager or Person in Charge.

All staff and in particular temporary or young staff are to be supervised by:

- Supervisor (or Buddy) day-to-duties.
- Site Manager – overall standards of behaviour of the team and compliance with Liverpool University HR policies.

Staff in training (including experience placements and apprenticeships) will be also allocated a “Buddy” to ensure that supervision and the transfer of “Know how” is an integral part of their daily activities.

Under 18’s will undertake a personal risk assessment and development plan.

Consultation on changes to processes and procedures will be undertaken as part of staff meetings and briefings, arranged as needed. These will be recorded

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2.4: Cleaning and disinfection

Aims

- To document the procedure for developing and using cleaning schedules and checklists that are specific to our premises and operation.

Contents

- Introduction.
- Cleaning schedules
- Cleaning checklists

Forms

Form no.	Title	This section	Appendix One
FH Form 2.4.1	Cleaning schedule		✓
FH Form 2.4.2	Cleaning checklist		✓

Introduction.

- We ensure our premises and equipment are cleaned and disinfected adequately in order to reduce the risk of contamination and food poisoning.
- High standards of cleanliness reduce the risk of pest activity.
- Effective, planned cleaning and disinfection is carried out by documenting and implementing cleaning schedules for both equipment and structure to ensure the highest possible standards of cleanliness throughout the operation. Completed checklists are used to demonstrate compliance with the schedule.
- Cleaning is carried out with at least the two-step process:

Step	Aim	Materials
1 - Clean	Remove debris & grease	<ul style="list-style-type: none">• Dishwasher, wash cycle.• Hot soapy water.• Degreaser (see chemicals list)
2 – Sanitise	Render the surface microbiologically safe	<ul style="list-style-type: none">• Dishwasher rinse cycle.• Sanitiser / disinfectant (see cleaning schedules for product use).

Cleaning schedules

The cleaning schedule is a document that details:

- **What** is to be cleaned
- **How often** it should be cleaned
- What **method and chemicals** should be used
- Any **health and safety** considerations, for example, personal protective equipment.

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- **Who** should carry out the cleaning

FH Form 2.4.1 is an example Cleaning Schedule.

Details of the disinfectant/sanitiser used are:

Product name	Sanitiser/disinfectant	Concentration	Contact time
Steri Clean	Sanitiser	Refer to product sheet and RA	30 seconds
Core Guard extreme	Sanitiser	Refer to product sheet and RA	30 seconds

Cleaning checklists

In order to record that cleaning is being completed according to the Cleaning Schedule, the Cleaning Checklist is signed off by:

- Those who have undertaken and completed the cleaning tasks.
- The Head Chef/Manager, to confirm the cleaning has been carried out to a satisfactory standard.

FH Form 2.4.2 is a Cleaning Checklist example form.

2.5: Personal hygiene

- We require our staff to complete a health assessment form on the first day of their employment. We also require them to report any illness and complete a return to work questionnaire after absence due to ill-health.
- Rules for food handlers are documented and communicated to them via the 'Essentials of Food Hygiene' induction notes and during Level 2 training.
- Further details can be found in section 5 of this manual.

Aims

- To provide details on how the prerequisite of Personal Hygiene is controlled within our food handling areas.

Contents

- Personal hygiene rules
- Procedure for health assessment of new food handlers
- Procedure for health assessment of food handlers returning to work following illness.
- Laundry facilities.

Forms

Form no.	Title	This section	Appendix One
FH Form 5.1	Employee health assessment		✓
FH Form 5.2	Return-to-work		✓

Note: Confidential personal information must be stored securely

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Personal hygiene rules

We have a strict personal hygiene policy to prevent contamination of food by food handlers. All food handlers must read and comply with these rules.

- Read and sign the '*Essentials of Food Hygiene*' notes.
- Wash yourself before you come to work.
- Food handlers must wear the protective clothing that is provided (including headwear) at all times whilst handling food.
- Non-food handlers working in a food-handling area are to maintain a high degree of personal cleanliness and wear clean clothing. Where necessary, protective clothing must be worn.
- Ensure your hair is tied back. Headwear and/or hairnets can be used to ensure best practice.
- Do not wear protective clothing outside.
- Store outdoor clothing neatly in the facilities provided and not in a food room.
- Do not wear jewellery, except for permitted sleeper earrings and/or a plain wedding ring.
- Do not wear watches (if wristbands must be worn, they should be covered to reduce the risk of contamination).
- Cover/remove any stud piercings.
- Keep fingernails short and clean with no nail varnish (clear or coloured); no false nails.
- Do not wear perfume or aftershave.
- Do not cough or sneeze over the food.
- Cover all wounds with blue, detectable waterproof dressings. If the wound is located on the hand or wrist, this should be further protected by the use of a glove.
- Do not smoke in any food room (smoking is only permitted in the specified area). This includes the use of e-cigarettes.
- Do not eat or drink in any food preparation room.
- Wash your hands before starting work, after using the toilet, after handling raw foods (and before handling ready-to-eat foods), after handling rubbish, regularly throughout the day and whenever the hands are contaminated.
- Use paper towels when touching taps where non-hand operable taps are not installed.
- Report to your line manager if you are suffering from, or known to be a carrier of, a disease likely to be transmitted through food or while affected with infected wounds, skin infections, sores, diarrhoea or vomiting. Management will then take the necessary action to ensure food safety is not compromised. You must not return to work until you have been symptom-free for at least 48 hours.
- Visitors to the kitchen (including maintenance) should be made aware of their hygiene responsibilities and wear protective clothing if they present a risk of contamination.

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Health assessment procedure for all new employees

- On their first day all new food handlers (including front-of-house staff) are asked to complete **FH Form 5.1**.
- If any of the answers to the questions on form 5.1 are yes, further advice should be sought from a medical practitioner before employing in a food handling capacity.
- Dates when new members of staff complete the assessment check are completed on the Training Summary Matrix or recorded on **Staff Induction Checklist**

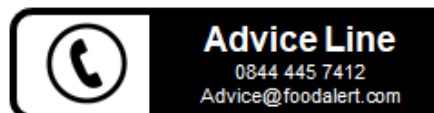
Procedure for when a member of staff is ill.

- All members of staff must report to management when they are suffering from an illness, especially if they are suffering from symptoms of food poisoning.
- If they are not at work, the member of staff must report to management by phone and not in person.
- If they fall ill during work, they must report this immediately to management and provide details of what food they have handled/prepared and what areas they have worked in. (Please see Emergency procedure 7 – Staff Illness for further details and advice). If you are unsure about whether a member of staff can return to work, contact the Advice Line

Return-to-work procedure for food handlers returning to work following illness

- On returning back to food handling duties following illness, or holidays in areas where food poisoning is endemic, employees are asked to complete **FH Form 5.2**.
- This is checked and then signed off by their manager as appropriate.

If advice is required in terms of information provided by employees, return-to-work health assessment guidance is available from the Advice Line.



Health assessment guidance	
Condition	Action to be taken
Carrier of typhoid or paratyphoid?	Exclude from employment until clearance is given in writing from G.P.
Contact with a typhoid or paratyphoid sufferer	Exclude from employment until clearance is given in writing from G.P.
Skin rash/dermatitis	OK if not weeping or bleeding; if weeping or bleeding then exclusion until clear.
Septic cuts on the hands	OK if not weeping or bleeding; if weeping or bleeding then exclusion until clear.
Boils	OK if not weeping or bleeding; if weeping or bleeding then exclusion until clear.
Diarrhoea and/or vomiting	Exclude until symptoms have stopped for at least 48 hours or clearance has been issued in writing from G.P. Ensure strict personal hygiene is practised on return.

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Bowel disorders (Crohn's disease, Irritable Bowel Syndrome, Ulcerative Colitis)	OK as long as food handler carries out good hygiene practices and notifies manager of any issues such as diarrhoea.
Discharges from the eye, ear, nose, mouth	OK if not weeping or bleeding; if weeping or bleeding then exclusion until clear.

Laundry facilities.

- We have made adequate laundry arrangements to ensure that clothing and cloths provided for food hygiene purposes are adequately disinfected.
- All protective clothing must be laundered at a temperature of at least 60°C.
- If staff are expected to lauder their own clothes, it must be included in their contract that they must use a cycle capable of temperatures in excess of 60°C.

2.6: Approval of food suppliers

- Arrangements are in place to assess the food hygiene standards of our suppliers and appropriate records are kept.
 - Via central procurement and use of the food buying group.
- Third party certification including SALSA and the BRC Global Standard for Food are among the preferred methods of pre-certification.
- Other third-party certification schemes are available

Aims

- To document our procedure for the approval of food suppliers.

Contents

- Approval procedure for food suppliers

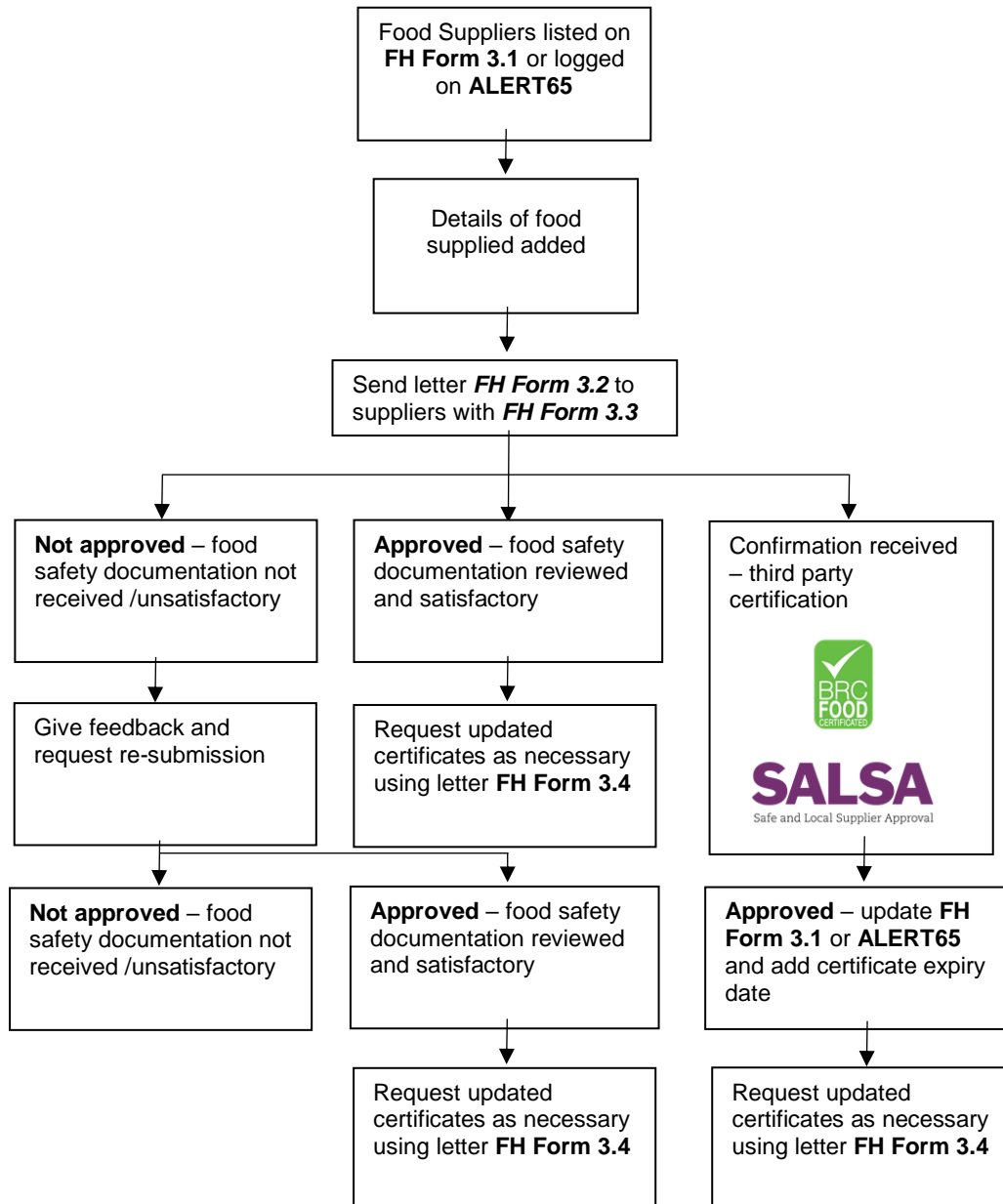
Forms

Form no.	Title	LOCAITON
FH Form 3.1	List of approved suppliers	Central Procurement
FH Form 3.2	Letter requesting supplier approval information	Appendix 1 (if needed)
FH Form 3.3	Supplier approval information request	Appendix 1 (if needed)
FH Form 3.4	Letter requesting updated approval certificate	Appendix 1 (if needed)



Approval procedure for food suppliers

- The highest priority suppliers are those who supply high-risk food (high protein content and which will not be subject to any further heat treatment), although all food suppliers should be considered.
- The following process is used although forms may differ:



BRC Global Standards <http://www.brcglobalstandards.com/standards/food/>

SALSA (Safe and Local Supplier Approval) <http://www.salsafood.co.uk/>

Records can also be stored in SharePoint, on site Files and within Central Procurement.

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2.7: Contamination prevention (including E. coli)

Aims

- To document our policy in relation to the prevention of contamination.
- To maintain records of glass/brittle plastic presence and breakages and knife control.

Contents

- Microbiological contamination.
 - E. coli controls.
 - Use of eggs.
- Glass and brittle plastic
- Cleaning chemicals and pest control measures
- Metal, wood and plastic

Forms

Form no.	Title	Location
FS 1.3	Time Separation Controls	Appx 1
FS 1.10	Register of glass and brittle plastics	Appx 1
FS 1.11	Glass breakages	Appx 1
FS 1.12	Knife damage log	Appx 1

Wherever possible the risk of contamination and cross-contamination has been eliminated or reduced. This includes risks of physical, chemical, microbiological and allergic origin at all process steps.

The risks of cross contamination have been analysed for each step in the operation and are documented in **Section 2: HACCP**.

The following procedures are in place to prevent contamination:

- Microbiological contamination
- Glass and brittle plastic
- Cleaning chemicals and pest control measures
- Metal, wood and plastic

Further details of the procedures can be found below.

Microbiological contamination:

The following steps are taken to prevent microbiological contamination:

- There is a logical flow through from preparation to cooking and post cooking.
- There is segregation of ready to eat and non-ready to eat foods

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- Disposable aprons are worn when handling raw fish/meat and unprepared vegetables (soiled) and are removed or changed before handling ready to eat foods.
- All staff receive induction training in food hygiene which includes the controls required to address the risks
- The documented HACCP includes pre-requisites and 'Critical Controls' that reflect the management of the risks.
- Regular audits and inspections are undertaken in order to identify any non-conformances of the controls that have been implemented.

E. coli Controls:

Liverpool University recognises the serious and significant hazard posed by *E. coli* and, in particular, *E. coli* O157.

The Guidance was updated by the Food Standards Agency in 2019. It has been studied and the company makes every effort to comply with it in the following way:

Introduction

- *E. coli* O157 is a food poisoning bacterium that can cause very serious illness and even death.
- Controls ensure that:
 - All ready-to-eat (RTE) foods are protected against direct or indirect contamination from *E. coli* O157 that could be present on non-ready-to-eat (non-RTE) foods, such as raw fish/unwashed veg.
 - Ready-to-eat foods can safely be consumed without further cooking or other processing, such as cooked meat, fruit, salads, pies, cheeses and sandwiches.
 - Non-RTE foods are foods that need be cooked or processed to ensure they are safe to eat such raw fish and soiled vegetables.

Layout of preparation areas

- Separation of RTE foods and non-RTE foods during preparation and storage, any areas/equipment where time separation is a necessary control are described in the Time Separation table.
- Workflow and chains of activities must not mix Non-RTE and RTE processes.
- Areas where RTE foods are prepared are identified as 'clean' areas.
- Separate storage areas for non-RTE and RTE foods are provided, where possible. Where this is not possible separate shelves are used with non-RTE foods always stored underneath RTE foods and shelves labelled indicating use.

Separation

- Separate food wash sinks are used for non-RTE and RTE foods. Where this is not possible food wash sinks are disinfected between use.
- Separate equipment such as chopping boards, containers, utensils (where necessary) are provided for RTE food.
- Designated RTE equipment is labelled or identified by a sign.

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- RTE equipment is washed in designated equipment wash sinks and disinfected correctly.

Complex equipment

- Complex equipment such as vacuum packers are designated as to be only used for either RTE foods or non-RTE foods – signage is displayed on or near the equipment.

Washing and disinfection of ready-to-eat fruit and vegetables

- Fruit, vegetables and salad leaves that are intended to be ready-to-eat are washed to remove any physical, chemical or microbiological contamination such as soil, insects and stones.
- Foods are thoroughly agitated during the washing process.
- Particular care is taken to avoid contaminating foods that are to be eaten raw, i.e. by using a clean disinfected sink or dedicated sink.
- Soiled vegetables are prepared on separate chopping boards to ready-to-eat salads and fruit.
- A visual inspection of food items is undertaken to identify any physical contamination.

Disinfection

- Colour coded cloths/tissues are used for disinfection of surfaces.
 - Drying cloths may not be used for any other purpose.
 - Single use / disposable towels are provided for use in RTE and non-RTE preparation areas
- Separate chemical spray bottles are provided in clean areas (CLEARLY LABELLED).
- Sanitisers and disinfectants meet BS EN 1276 and/or BS EN 13697.
- Sanitisers are used according to the manufacturer’s instructions; staff are aware of contact times and correct method of use.
- Surfaces are fully sanitised twice (at end of each shift – extended contact time) using the correct method and contact time.
- Hand contact such as taps, basins and fridge door handles surfaces are cleaned and disinfected adequately and regularly.
- Knives and utensils used both for RTE and non-RTE foods are cleaned and disinfected between use.
- Heat cloths are only be used to protect hands from hot surfaces and not used for cleaning.

Packaging

Separate packaging is provided for RTE foods. This packaging is covered and stored in a clean food area to prevent cross contamination.
Only food-grade packaging is used.

Personal hygiene

- Staff carrying out both RTE & Non-RTE processes must:

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- Use disposable aprons when handling non-RTE foods (and remove them when finished).
- Use disposable gloves as above.
- Wash hands and wrists before moving to RTE process.
- IF uniform becomes contaminated it must be changed (before moving to an RTE process).
- Non-hand operable taps should be provided, where these are used by non-RTE and RTE food handlers.
 - Alternatively, paper towel is used by food handlers when using the taps (to turn taps off).
- Bactericidal soap is available and is used.
- Food handlers are trained regarding E. coli O157 controls.

Use of eggs

Products that are made from raw egg may contain *Salmonella* bacteria, which can also be present on the shell of the egg itself.

The following guidelines apply to raw eggs. Any risk is greatly reduced when eggs are cooked thoroughly.

- Eggs are supplied from certified flocks: Confirmation of inoculation status is recorded in the supplier approval file.

All food handlers are made aware of the following policy and monitored to ensure they are adhered to at all times:

- Store eggs in a cool dry place (or in a chiller), and always away from ready to eat foods.
- Ensure eggs are clearly marked with a 'best before' date (or transfer from the outer carton); ensure strict stock rotation.
- Store raw eggs away from high-risk foods e.g. dairy products, cooked meat.
- Hands must always be washed after handling eggs.
- Cracked or damaged eggs are not to be used under any circumstances.
- Preparation surfaces, utensils and containers should be cleaned and disinfected (sanitised) as a matter of course and always between the preparation of different dishes.
- Where eggs purchased by the company are 'Lion Quality', ensure the Lion Quality mark is visible (this is for emergency purchases e.g. from approved reserve suppliers such as Tesco or Sainsbury).
- Raw eggs must, in general, be fully cooked or alternatively, pasteurised eggs utilised.

Glass & brittle plastic policy

In order to reduce the likelihood of physical contamination from glass and brittle plastics, Liverpool University operates a policy of ensuring glass & brittle plastics are excluded from food processing areas as far as possible.

- Foods/ingredients are purchased without glass packaging, where ingredients are unavoidably supplied in glass they will be stored in deep sided tubs and/or on lower shelves.
- Where glass/brittle plastic is present in kitchen areas (e.g. internal windows):

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- This will be monitored daily.
- Planned replacement with appropriate materials will be considered.
- Fluorescent tubes/light bulbs will be protected by plastic shields in all food handling & storage areas or where food packaging is stored.
- Light fittings / shields will only be cleaned or maintained during non-service hours.
- Any windows that are found to be cracked or broken will be made safe immediately until the necessary repairs can be carried out.
- Glass thermometers or other probes will not be used in any part of the premises. Where this is not possible a strict procedure will be in place for inspection of the probe pre- and post-use and the measurement process will be isolated from the preparation of served food.
- Visiting contractors will be made aware of the glass policy.
- Glass, brittle plastic and other sources of contamination have been removed from the kitchen areas where possible. If removal is not possible logging & monitoring has been put in place.
- If there is a breakage incident the details should be recorded including what was broken, location and details of the food/packaging that was discarded as a result. The breakage should be recorded.
- Tubs that fall and become damaged will be discarded.

Chemicals and pest control measures (see also pest control prq)

The following measures are in place for general substance contamination:

- All chemicals used within the business are from approved suppliers and are only used as outlined in the site COSHH assessments.
- Cleaning chemicals are kept in closed containers, and in secure storage area or lockable cupboard away from food handling areas except when in use.
- Manufacturer’s instructions and dilution rates are followed at all times.
- Products that must be decanted are transferred into clearly labelled containers.
- Employ competent Pest Control company is used (see Pest Control Policy).
- No open baits in food handling areas.
- No fly killers above food preparation areas.
- Staff may not bring medicines/home cleaning chemicals or other substances into the kitchens without the relevant controls (as outlined in SOPs or other Prqs).
- Maintenance operatives and contractors must ensure that clean up processes following works are fully completed.

Metal, wood & plastic policy

- Structural materials are designed, installed and monitored to avoid the risk of fragmentation /production of physical contaminants.
- Wooden utensils are not permitted in the kitchen areas with the exception of items used in the final dish specification e.g. skewers for kebabs (see HACCP section 2 and dish specs).

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- Wooden pallets can be brought into the delivery areas but should be removed as soon as stock is logged, inspected and stowed.
- Plastics used for equipment/storage/packaging is food grade and monitored.
- Where possible plastic items will be coloured to enhance spotting of breakages/fragments.
- Metal contact surfaces are inspected daily for; nicks, burring or breakages. This includes:
 - Knives/cleavers.
 - Mincer/mixers.
 - General equipment bodywork.
 - Tongs/plungers.
- Wear and tear (including equipment bodywork and non-food contact areas) is monitored, with damages being reported for repair.
 - Temporary repairs must be made promptly and appropriately to minimise any hazard from unattended damages.

2.8: Process Controls

Aims

- To provide details on how the Critical Control Points of the preparation and service of the foods identified in the HACCP should be undertaken.

Contents

- Why do we check and record temperatures?
- What foods must be checked?
- What equipment do we use?
- Procedure for calibrating probe thermometers
- Monitoring of goods receipt temperatures
- Monitoring of refrigerator and freezer temperatures
- Monitoring of cooking and reheating temperatures
- Monitoring of chilling times and temperatures
- Monitoring of hot holding temperatures
- Monitoring of ambient display times
- Use of the Food Alert Digital 'Due Diligence Diary'

Forms

Form no.	Title	This section	Appendix One
FH Form 4.1	Probe calibration		✓
FH Form 4.2	Goods receipt temperatures		✓

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FH Form 4.3	Log of refrigerators and freezers		✓
FH Form 4.4	Refrigerator and freezer temperature		✓
FH Form 4.5	Cooking and reheating temperatures		✓
FH Form 4.6	Chilling times and temperatures		✓
FH Form 4.7	Hot holding temperatures		✓
FH Form 4.8	Ambient display times		✓
FH Form 4.9	Kitchen Daily Log (general)		✓

Why do we check and record temperatures?

- We are required to provide evidence that the food we sell is safe to eat by documenting our procedures and keeping records of the checks being undertaken.
- Temperature records help to confirm compliance with our food safety management system (HACCP).
- If there is a food safety issue with our business, we may rely on the defence of 'due diligence'. This means we have taken all 'reasonable precautions' to control risks and produce safe food. Our temperature records can form part of that defence.

What foods must be checked?

Our HACCP identifies the 'high-risk' foods from our menu that we need to monitor.

These are the foods that are high in protein (can support the growth of bacteria) and will not have any further treatment to make them safe.

Examples include cooked meat and poultry, dairy and egg products as well as cooked rice (which can contain the bacterium *Bacillus cereus*).

What equipment do we use?



Two digital temperature probes

All food and water temperature checks (One for RTE and one for non RTE foods)



**Infrared 'gun'
(Where required as indicated by HACCP)**

Temperature checks of goods received, chilled & frozen storage and hot water. Not used for cooking/reheating checks



Disinfecting probe wipes

Disinfecting temperature probes before and after use

Staff must be trained to use the correct procedure when taking and recording temperatures.

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Where do we store our records?

Completed temperature records are stored in the relevant sections of the **Food hygiene records folder**.

Procedure for calibrating probe thermometers

- Probe thermometers are calibrated every month by checking the temperature of melting ice.
- The results are recorded on **FH Form 4.1**.
- Temperature of melting ice solution is obtained by putting ice into cold water and stirring until some ice is left. Where deviations are identified, the probe must have its battery replaced or be returned to the supplier for recalibration or simply replaced.
- If a probe comes with a Calibration Certificate, it should be retained safely in the records file under probe calibration.

Goods receipt temperatures

- All foods are subject to visual inspection when they are delivered.
- The temperature of high risk food is checked using a digital probe or infra-red 'gun'.
- **FH Form 4.2** or the **Due Diligence Diary** is used to record the checks.
- High risk chilled food (plus any special care items identified in special HACCPs) should be at or below 5°C. Food items above 8°C are rejected.
- Frozen food should be at or below –15°C. Food items above -15°C are rejected.
- Suppliers are informed if they consistently deliver foods that are outside of the acceptable range.
- The Head Chef/Manager is informed of any problems identified.

Monitoring of refrigerator and freezer temperatures

- The temperature of the refrigerators and freezers in which food is stored are checked and recorded at least twice per day.
- **FH Form 4.4** or the **Due Diligence Diary** is used to record the checks.
- Preferably, an item of food (or a clearly marked cup of water or other suitable food 'simulant' left in the unit) is to be probed. Alternatively, an infra-red 'gun' can be used.
- If there are time constraints preventing the probing of items, the temperature gauge/LED display on the equipment is checked. However, food items must be checked with a probe thermometer once a week – a 'P' is added to the record to indicate this.
- Refrigerators and walk-in chillers must be operating at or below 5°C. If the air temperature is found to be 5°C, the food temperature should be monitored using a probe thermometer. Freezers should be at or below –15°C (except for ice cream freezers that are in service and can be at -12°C).
- If food is found to be between 5°C and 8°C, the equipment is adjusted and rechecked after 30 minutes.
- If after 30 minutes chilled high-risk food is still above 5°C, it is moved to an alternative refrigerator that is keeping food at 5°C or less.
- The Head Chef/Manager should be informed of any problems identified.

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Monitoring of cooking and reheating temperatures

- High risk foods are cooked to ensure that the centre of the food has reached at least 75°C for 30 seconds.
 - Equivalent time temperature combinations may be used and these will be specified for a particular dish where necessary:
 - 70°C for 2 minutes;
 - 65°C for 10 minutes
 - 60°C for 45 minutes.
- Beef, venison and lamb steaks/joints (not including rolled joints) can be just seared.
- UK farmed Atlantic salmon, Atlantic halibut, and rainbow trout may be served undercooked as no parasites are present. Other marine fish is cooked to 60°C for 1 minute or must be pre-frozen referring to the use of fish section.
- At least 3 recorded checks are undertaken during every service.
- **FH Form 4.5** or the **Due Diligence Diary** is used to record the checks.

Sous-vide

This is currently not used, if Chefs plan on using this method a special HACCP will be issued to cover the process.

Monitoring of cooling/chilling times and temperatures

- High-risk foods are cooled via:
 - Cold water rinsing (rice only).
 - Blast chiller (preferred)
 - Ice baths.
 - Ambient temperature (avoided if possible).
- High-risk foods are cooled/chilled as quickly as possible and placed into the refrigerator as soon as it is safe to do so.
- Chilling food in a blast-chiller is the preferred method. The food is spread out on shallow, metal trays and the door is not opened unnecessarily during the process. A blast-chiller should be able to reduce the temperature to below 8°C within 90 minutes.
- Other cooling methods should aim for to reduce the temperature to below ambient temperature (<20°C) within 90mins to allow the food to be safely placed into a storage chiller.
- **FH Form 4.6** or the **Due Diligence Diary** is used to record the checks.
- We note the actual temperature of each batch of high-risk foods cooled at ambient after 90 minutes.
- The method used is detailed on the monitoring form.

Monitoring of hot holding temperatures

- The temperature of foods which are being held hot is checked and recorded during every service.

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- The foods must be above 63°C. If the temperature is below 63°C, corrective action will be taken and recorded.
- If a dish is not hot enough at any point during hot holding, we either reheat it until it is above 75°C and return to hot holding (only once) or we chill food safely and reheat it later before serving. If we cannot do either of these things, the food is discarded.
- **FH Form 4.7** or the **Due Diligence Diary** is used to record the checks.
- The foods are probed at least once during service (or every 2 hours if on display for longer).
- Alternatively, warm food can be held/displayed at temperatures below 63°C for a period not exceeding 2 hours, but we must keep quantities of food to a minimum. Where time control is in use it is monitored and recorded using **FH Form 4.8**.

Monitoring of cold display

- The temperature of foods that are being displayed cold is checked and recorded during every service. The food must be at 8°C or below.
- If the food is not cold enough, it will be moved to another display fridge which is able to meet the requirement of keeping food at or below 8°C or to a storage fridge which is capable of holding food at 5°C.
- The food is probed at least once every 4 hours.
- Alternatively, cold food can be held/displayed at temperatures above 8°C for a period not exceeding 4 hours, but we must keep quantities of food to a minimum. Where time control is in use, it is monitored and recorded using form **FH Form 4.9**.

Monitoring of ambient display times

- High risk foods can only be kept above 8°C during display/service for up to 4 hours.
- When we remove food before the end of four hours, it can be placed under refrigeration, and be used directly from the storage fridge, but it can't go out on ambient display again.
- We must keep quantities of food to a minimum.
- Time control is monitored and recorded using **FH Form 4.9**.

Maintaining performance of refrigerators and freezers

Overloading chilled and frozen storage equipment can affect temperature control. We check to ensure:

- Fridges and freezers are not overloaded.
- Airflows are not blocked.
- Freezers are defrosted regularly.
- Fridges and freezers are serviced regularly.

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2.9: Pest control

- The company will follow the pest control procedure to ensure the premises are free from pests as far as reasonably possible.
- If deemed necessary, a pest control contract will be put in place with regular visits along with arrangements for emergency call out. Recommendations are to be followed up, actioned, monitored and signed off when completed. This can be done either on the documentation supplied by the pest control contractor or on their on-line portal if available.
- The pest control contract would cover rodents, crawling insects and flying insects as well as the servicing of any electric fly killers.
- All sightings and evidence of pests are reported to the manager immediately, recorded and the contractor informed.
- Electric fly-killers are operational at all times and serviced (including changing UV light tubes) in accordance with the supplier's recommendations; catch trays are emptied at least monthly.
- Refuse is covered during storage and disposed of frequently.
- Staff are trained on how to detect and prevent pest infestation (refer to training materials in section 10 of this manual).
- The premises are kept clean and food is covered and sealed during storage.
- Deliveries are checked for signs of pest infestation.
- The premises are pest-proofed and exterior doors are left open for a minimum amount of time.

Monitoring to identify and prevent pest problems

- Evidence of damage and debris caused by pests.
- Droppings, footprints, egg cases or smear marks.
- Cracks and/or holes in the building structure or around the walls, doors or windows.
- Food debris adequately cleared away upon opening and before closing.
- Covering of refuse during storage.
- Exterior doors kept closed.
- Electric fly killers operational and emptied regularly.

What we do if signs of pest activity are discovered

- Manager is informed immediately.
- Pest control contractor is contacted immediately or Food Alert Advice Line can be contacted for advice if a pest control contract is not in place.
- If an infestation is suspected, equipment, utensils and food preparation surfaces are adequately cleaned and disinfected at the beginning of each service. Foods in soft packaging are to be placed into hard lidded containers.
- Food that is suspected to be contaminated by pests is thrown away immediately.

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2.10: Stock Control

Aims

- To document our policy in relation to stock control and date labelling.

Contents

- Stock rotation and date labelling of foods
- Non-conforming products

Forms

Form no.	Title	Location
FS Form 1.21	Non-conformance / wastage Log	Appx 1

Stock rotation and date-labelling of foods

- Effective stock rotation is important in controlling the growth of bacteria, moulds and yeast due to the shelf-life of food being exceeded. It also controls the deterioration in quality of long shelf-life products.
- All received high-risk foods are prepared and supplied remaining within any previously applied expiry.
- All bought-in long shelf-life/ambient-stable foods/ingredients are processed before the expiry of their 'Best Before' date.
- Non-perishable ingredients in use must have "best before" date applied.
- High-risk foods must have "use by" date applied.
- Stock checks must ensure the stock is rotated within the applied shelf-life.
- Foods are not used if they are:
 - Beyond their expiry date.
 - Damaged/visually contaminated.
 - Otherwise unfit or of poor quality.
- All incoming foods can be tracked via lot numbers/delivery notes to allow arrival date to be traced.
- If food batches are broken down the date label is applied to all sub-packs (if not already labelled), (ingredient/allergy information is already logged).
- Foods prepared on the premises are provided with a 'Use By' date in accordance with the shelf-life as set out in the table below.
- Stock is used on a first in first out basis (FIFO).

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Table 2.10.1: Liverpool University: Product Shelf-life Summary.

Preparation method	Shelf-life
Foods cooked and chilled on premises	Day of preparation plus 3 days.
Foods defrosted under refrigeration on the premises*	Day of defrost plus 3 days.
Chilled foods prepared on the premises	Day of preparation plus 3 days.
Chilled foods that are frozen on the premises*	Day of preparation plus 3 months.
Opened packs of dried or long-life foods	Within original 'Best Before' date or pack instructions.
Decanted dried foods or long-life foods	Transfer original 'Best Before' date (or pack instructions) onto decanted container.
Prepared low-risk foods (e.g. biscuits, dry mixes, vinegar-based products).	Day of preparation plus 2 weeks max (based on quality)

*Foods that are frozen from delivered stock must show a “frozen on” label/date, which must be more the 4 days before the supplier expiry on the pack.

Monitoring/Non-Conformance action

- Any foods that have exceeded their use by dates or are poor quality are marked as '**DO NOT USE**' and discarded.
- If for any reason it has to be kept, it is segregated it from all other foods, wrapped, marked '**DO NOT USE**' and placed in the sealed quarantine container.
- Record any out of date, damaged or otherwise non-conforming product, on the Non-conformance / wastage log.
 - Non-conformance that affects safety, must be escalated to senior management immediately and food processing must stop if there is an ongoing risk.
 - Both Quality and Safety non-conformances will be investigated.

2.11: Equipment & maintenance

Aims

- To document our equipment standards.
- Outline provisions for maintenance of equipment and structure.

Contents

- Equipment standards
- Maintenance overview
- Maintenance procedure
- Hand back after maintenance

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Forms

Form no.	Title	Location
FS Form ESR	Equipment & servicing register	Appx 1
FS Form WHB	Works hand back form	Appx 1

Equipment standards

- Equipment on site is suitable and safe for the task.
- New equipment is assessed for suitability by the senior managers.
- Where possible equipment and racking are wheeled to allow ease of movement for cleaning and layout changes.
- Where equipment is permanently sited it shall be sealed to the floor.
- Equipment is of food grade material and easy to clean.
- Equipment is subject to visual inspection by staff and managers and is repaired as necessary either by in-house maintenance or a supplier approved engineer.
- Key equipment will be serviced as per the manufacturer's recommendations by qualified engineers/operatives (Equipment & servicing register).
- Cleaning schedules are in place.

Maintenance overview

- Planned maintenance arrangements are in place for critical equipment such as refrigeration and emergency contact details are held. Refrigeration maintenance is planned in advance wherever possible. Outlined on Form ESR.
- Planned maintenance is, so far as is reasonably practicable carried out of normal service times.
- Equipment and premises are checked daily by designated staff and any maintenance required is logged. The following is in place when maintenance is carried out.

Maintenance procedure

- Open foods are put away or cleared from the area being worked on.
- Contractors are advised of the need to:
 - Complete the health declaration.
 - Ensure all lubricants used are food grade as appropriate.
 - To remove all tools and working debris on completion.
 - Any additional controls required should be agreed in advance.
- Any unforeseen situations are to be reported to the Manager or Person in Charge.
- All maintenance work where possible, takes place outside service times.
- Temporary repairs are avoided, but where needed must provide; a cleanable, stable surface until a permanent repair can be made.
- Light tube/bulb changing only takes place outside of service times due to the risk of contamination.

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- Any breakages recorded on glass/plastic breakage log.

Hand back after maintenance

- Check areas to ensure any tools, nuts, bolts etc. have not been left.
- Clean and disinfect any equipment or surfaces that may have become contaminated.
- The Manager or Person in Charge should release the area and complete Form WHB.

2.12: Food Conformity and Labelling.

Aims

- To document the labelling control arrangements.

Contents

- Product conformity
- General labelling information
- Quantity information
- Ingredient & Nutritional information
- Allergen labelling
- Labelling checks

Forms

Form no.	Title	Location
FS Form WMC	Weekly Manager's Checks	Section 3
FS Form PSS	Dish specification sheets	Section 3

Product Conformity

All products will conform to current legislative requirements and quality required by Liverpool University.

Conformity requirements are set out in **the supplier and dish specifications sheets**, other pre-requisite programs and the **HACCP** plan in Section 2.

A combination of recorded checks and ongoing staff observation during processes is expected to identify non-conforming products (based on safety and/or quality). These will be recorded on the non-conformance / wastage log with further actions being taken according to the type / severity of the non-conformance and the location of the product when the non-conformity has been identified (*as described in detail in other Prqs*).

General labelling information

To sell food and drink products, the label must be:

- clear and easy to read

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- permanent
- easy to understand
- easily visible
- not misleading

Foods packed and labelled within the University for use within university outlets will show:

- the name of the food
- a 'best before' or 'use by' date (or instructions on where to find it)
- any necessary warnings
- quantity information
- a list of ingredients (if there are more than 2)
- instructions for use or cooking, if necessary
- Allergen information.

Quantity information

- Net quantity in grams, kilograms, millilitres or litres will be placed on packaged product over 5g or 5mL:
- Solid foods packed in a liquid must show the drained net weight.
- You must be able to see the quantity information when you read the name of the food on the label (clearly and close by).
- Weight or volume of foods is not shown where product is sold by number, providing you can clearly see the number of items inside the packaging.

Ingredient & Nutritional labelling

We provide compliant nutrition labelling for:

- Pre-packaged foods not covered under the exemptions outlined in Annex V of 1169/2011.

Labelling controls & checks

- Designated staff are trained in the use of the labelling software/equipment Menu Command by DayMark
- Weekly recorded checks are made to ensure correct label and use by information is applied to the correct product (do during stock rotation checks).
- Prior to the labelling run the legibility and rotation date is checked.
- Labelling requirements are reviewed annually or due to:
 - Changes to products/specifications.
 - Changes in legislation.
 - Customer requests.
 - Changes in the labelling equipment/software.

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2.13: Internal delivery / transfers.

Aims

- To document our policy in relation to inter-site foods delivery.

Contents

- Internal delivery control.

Form no.	Title	Location
-	Individual site records for goods receipts	N/A

Internal Delivery Control

- All high-risk food is packaged and held under refrigeration until despatch.
- All deliveries of non-ambient stable product are made in a refrigerated vehicle or appropriate insulated carrier.
- Temperature monitoring is carried out by:
 - Despatch temperature.
 - Receipt temperature at receiving unit.
- Delivery drivers will report problems immediately to their line manager.
- Where a vehicle breaks down during a delivery run:
 - Delivery driver to call their line manager immediately.
 - Arrangements made to send a second vehicle and recovery contractor.
 - Where product temperature is not compromised (see HACCP) second vehicle can continue delivery or transferred stock. This will be recorded on the Vehicle check sheet.
 - If a second vehicle cannot be sent or temperature control is lost, then stock will be returned to the despatch unit for wastage. Recorded on non-conformance / wastage log.
- All delivery vehicle load areas are cleaned/inspected daily, and records kept.
- All vehicles are subject to planned maintenance (see equipment register).

2.14: Testing to support shelf-life and verification.

Aims

- To document our policy in relation to product shelf life.

Contents

- Shelf-life testing
- Sampling and general testing

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Shelf-life testing

Shelf-life testing will only be used where the prepared high-risk foods need to be given a shelf-life in excess of the general shelf-life guidelines set out in the Shelf-life table (i.e. in excess of day of preparation plus 3 days).

A UKCAS approved laboratory will be used to do this.

Sampling and general testing

Environmental and general testing/sampling will be used in the following circumstances:

- Incident response.
- Repeated failure of audits and inspections where testing is deemed to be useful.
- To help investigate patterns of complaints or non-conformances.

2.15: Allergens - See separate policy and HACCP.

Acrylamide is a chemical substance formed when starchy foods, such as potatoes and bread, are cooked at high temperatures (above 120°C). It can be formed when foods are:

- Baked
- Fried
- Grilled
- Toasted
- Roasted

Acrylamide is not deliberately added to foods – it is a natural by-product of the cooking process and has always been present in our food. Laboratory tests show that acrylamide in the diet causes cancer in animals. Scientists currently agree that acrylamide in food has the potential to cause cancer in humans and it would be prudent to reduce exposure.

It is found in a wide range of starchy foods including:

- Roasted potatoes and root vegetables
- Chips
- Crisps
- Toast
- Cakes
- Biscuits
- Cereals
- Coffee

Best practice, mitigation measures, and benchmark levels for the reduction of the presence of acrylamide in food have been established as set out in *Commission Regulation (EU) 2017/2158 'establishing mitigation measures and benchmark levels for the reduction of the presence of acrylamide in food'*

Acrylamide in Bakery Products

We minimise acrylamide in bread (including toast) and bakery products that we bake in house such as biscuits, cakes, scones, bread rolls etc. by:

- Using approved suppliers and specifying that acrylamide levels are to be as low as possible

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- Using a lower temperature for a longer time used to achieve the same final moisture content and to avoid excessive browning of the crust.
- Following the manufacturers' baking instructions (and any colour guides they may provide) carefully when finishing par baked products.
- We follow any available baking colour guides when baking bread, and baked products or toasting bread or toasting sandwiches.
- If colour guides are not available, we aim for a golden colour.
- Where we use rye and darker flour baked goods that are already darker in colour, we follow any instructions and ensure they are not overcooked.

Acrylamide in Fried/Roasted Potato Product

We minimise acrylamide in potato products such as roasted potatoes, chips, fries, root vegetables, crisps etc. by:

- Using low starch/sugar potatoes
- Checking that potatoes are in good condition and are not bruised/damaged
- Storing potatoes in a cool dark dry area above 6°C, and not refrigerating potatoes
- Cutting potatoes/chips/crisps to a uniform size so that none are overcooked
- Reducing the sugar before deep frying potato products we have prepared by either soaking for 5 minutes in warm water then rinsing in clean water or blanching potatoes first
- Not pre-seasoning potato products
- Only half filling fryer baskets - frying smaller quantities for a shorter period
- Using an oil cooking temperature of less than 175°C
- Regularly filtering and skimming oils and fats to remove fines and crumbs
- Pre-frying in oil set at a cooking temperature of less than 160°C for multiple cooked products e.g. double cooked chips
- Frying until golden yellow
- Following manufacturers' instructions and available colour guides carefully when deep frying frozen potato products or oven cooked products
- Following manufacturers' instructions and available colour guides carefully for in-house oven cooked products
- Setting oven temperatures to between 180-220°C and cooking until golden yellow.

2.17: Use of Fish

- Fish (or cephalopod molluscs) which are to be eaten raw or not fully cooked through must have undergone a freezing process where the whole product is fully frozen at -20°C for 24 hours or -35°C for 15 hours.
- The above is subject to FSA exemptions covering specified wild fisheries, Atlantic farmed salmon or hot smoked fish where the core temperature has reached 60°C for 1min.

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- We will ensure it is clear which fish products supplied have already undergone a freezing process pre-delivery. Ensure this information is placed in Records Folder.
- In-house freezing is recorded on the Frozen Fish Log and supported by freezer temperature records carried out to support the core HACCP.
- Marinating processes, which render raw fish acceptably safe to eat need not be pre-frozen but must be covered by a Special HACCP addition. This must also be backed up by clear scientific evidence.

2.18: Vacuum Packing (not currently used – included for future developments)

Where this process is used the following will be observed:

- Separate units for Raw (non-RTE) and Cooked (RTE) will be used and these will be clearly labelled.
- Raw fish that is to be cooked through will be packed in the Raw unit.
- Raw fish that is subject to low temperature / light cooking process will be packed in the Cooked unit (subject to any other risk factors).
- Vacuum packers will be cleaned using two stage cleaning at the end of each day. At the start of each day and at the end of the lunchtime shift each unit will be fully sanitised.
- Vacuum bags will be rated to be stable at temperatures of 120°C or above and will be at least 80um thick and will be BPA free.
- The units will be serviced according to the manufacturer’s recommendations or at least annually.
- Periodic deep cleaning will be carried out following the manufacturer’s instructions (if applicable).
- Shelf-life of vacuum packed foods will not exceed 5 days (day of prep plus 4) unless supported by shelf-life testing.
- Vacuum packed foods in line with the core HACCP will be stored at the target limit of 5°C or less.
- Any bag that has lost its seal during storage will be treated as normal prepared food and will revert to 3 day shelf-life.
- Staff will not adjust any settings on the units (e.g. heat seal, vacuum parameters) without consultation with a competent person (trained engineer and or senior staff member with specialist training).
- Service Bags for each unit will be stored separated in clean boxes with tightly fitting lids (and not stored with any other items).
- Bulk stored bags will be protected from damage from sharp objects and ingress of pests.

2.19: Traceability

- Records of purchases from suppliers are kept.
- All foods prepared are for use within the University estate.
- Food ingredients are provided by approved suppliers who have adequate arrangements for traceability in place.
- Packaged ingredients are provided with date-coding such as ‘Use By’ or ‘Best Before’ which enables a degree of traceability.

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2.20: Genetically modified foods

- University policy is that it does not knowingly sell any foods that contain Genetically Modified Organisms (GMOs).
- If we are aware of any GM ingredients being used, Food Alert is contacted for advice.

2.21: Verification processes.

Aims

To provide information and procedures relating to verification via the following inspections:

- Enforcement - Environmental Health Officers (EHOs)
- Food Alert - Consultant
- Pest control - Contractor
- Internal – Self-assessment
- Opening and closing checks

Contents

Details relating to:

- Environmental Health Officers visit procedure.
- Food Alert audits
- Pest control inspections
- Internal audits
- Opening checks
- Closing checks

Forms

Form no.	Title	Location
FH Form	Record of Environmental Health Officer visits	Appx 1
FH Form	Internal audit	Appx 1
FH Form	Opening checks	Appx 1
FH Form	Closing checks	Appx 1

Environmental Health Officers visit procedure

Food hygiene law is enforced by the local authority's **Environmental Health Department**.

When an enforcement officer visits, we:

- Ask the officer to present their identification card and note details.

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- Introduce the General (or Duty) Manager to the Environmental Health Officer, who then introduces the Front-of-House Manager and the Head Chef.
- Ensure the management and staff co-operate fully.
- Ask the officer to provide a debrief at the end of their inspection so that notes can be made of any necessary actions, this will then enable you to correct these issues as soon as possible.
- Request that the correspondence be sent to the person in charge of the company with a copy to the premises.
- File copies of correspondence in the **Food Hygiene Records Folder**.
- Details of any action taken as a result of the visit are recorded by marking off on the correspondence itself in a letter to the EHO or on an action plan.

We are given a Food Hygiene Rating based on:

- How hygienically our food is handled.
- The condition of the structure in the food handling areas.
- How we manage and document food safety.

We can contact the **Advice Line** if we are unhappy with our rating.

Food Alert audits

The **Food Alert** audit reports are marked off with details of the action taken and supported with action/completion dates.

This can be completed on the reports themselves or on-line via **Alert65**.

Pest control inspections

The **pest control logbook** is located here:

Manager's/Chef's office /onsite file

Pest control reports and advice sheets are marked off with the details of the action taken as well as the date of completion.

Internal audits

Internal audits are completed at least quarterly using **FH Form 8.2** by the Head Chef or their nominated representative.

Action taken is recorded on the reports themselves.

Alternatively, the audits can be completed online using **Alert65**.

Opening checks

We use **FH Form 8.3** to complete our Opening Checks.

Adequate supply of hot water

- The temperature of the hot water supply should be checked daily using a probe thermometer.

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- Run the hot tap for 1 minute and ensure the tip of the probe is placed into the running water. Record the temperature when it stabilises on the digital thermometer.
- The temperature of the hot water supply at the sink should be at or above 50°C.

Dishwasher operating correctly

- Check to make sure the curtains are in place and the machine is clean (if applicable).
- Check that there are adequate supplies of chemicals.
- Allow the machine to fully warm up before operating.
- Check no error messages are displayed on the control panel.
- At the very least, crockery, cutlery and glassware should be very hot to the touch as it first leaves the dishwasher, with water evaporating rapidly.

No signs of pest activity

- The premises should be checked daily for signs of pest activity.
- This includes looking for evidence of droppings, damaged packaging, smearing and potential access points.
- Any signs of pest activity (damaged food packets, spilled foods, droppings etc.) should be recorded and reported to the manager.
- The pest control contractor must be called out if necessary.
- Any potentially contaminated food must be discarded.
- Any potentially contaminated equipment must be cleaned and disinfected immediately.
- Do not touch bait boxes. If they need to be moved for cleaning purposes then ensure that they are replaced to their original position.

All foods are dated, within date and protected

- High-risk and perishable foods are labelled with a 'use by' date, either by the supplier or in accordance with our 'in-house' system.
- Any food beyond its 'use by' date is discarded.
- All foods are covered to prevent them becoming contaminated.

Adequate supplies of hand washing materials

- The hand wash basins are checked for adequate supplies of bactericidal soap and paper towels.
- Supplies are replenished if necessary.
- Stocks of hand washing materials are checked and re-ordered if necessary.

Checking supplies of cleaning materials

- The kitchen is checked to ensure that an adequate supply of detergent, disinfectant, sanitiser and cloths are available.
- Supplies are replenished if necessary.

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- Stocks of cleaning materials are checked and re-ordered if necessary.

Food preparation areas – clean and sanitised

- Before food preparation takes place, food-contact surfaces are cleaned and disinfected according to the instructions given on the sanitiser label.
- Disposable cloths are used.

Staff are fit for work

- All staff including casual and agency are asked to complete a health questionnaire on their first day of work (and before they handle food).
- Food handling staff are checked to ensure that they are wearing clean protective clothing, any cuts have been covered with blue plasters and that excessive jewellery has been removed (in-line with our policy).
- Any staff illnesses are reported and appropriate action taken, including exclusion, if necessary.
- Any staff returning to work following recovery from sickness are to complete a 'Return to Work' Questionnaire (**Form FH 5.2**).

Checking of live shellfish

- Upon receipt and opening, all live shellfish are checked to ensure that they are alive and healthy; any dead shellfish are disposed of.
- We retain health marks for 60 days and ensure a system is implemented whereby we can trace the batch of shellfish that was used on each day.

For further information about the handling of shellfish, please see the Special HACCP and the Alert65 sheets 'Shellfish' and Oysters.

Closing checks

We use **FH FORM 8.4** or **Alert65** to complete our Closing Checks. See *Appendix One*.

Food stored correctly

- A check is carried out to ensure all foods are covered and protected against the risk of contamination.
- No temperature controlled food is left out.

Rubbish has been removed and new bags put into the bins

- A check is carried out to ensure that all rubbish is removed from the kitchen and bins are left clean.

Cleaning cloths are removed and replaced

- The kitchen is checked at the end of the day to ensure that all cleaning cloths are disposed of or disinfected in line with the laundry policy in section 2 of the manual.

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Equipment switched off/isolated

- Ensure any gas or electrical equipment that can be switched off is turned off at the end of each day.

Cleaning schedule checklist completed

- The manager confirms the cleaning tasks have been completed to an acceptable standard.

Food past its 'use by' date has been thrown away

- Food items are checked to make sure they are not out of date and disposed of if they are.

Record-keeping

Records of inspections can be maintained using **Alert65** or the **Food hygiene records folder**.

2.22: Complaints handling and food recalls.

- Adequate arrangements for the dealing of alleged food poisoning and food complaints have been made.

Aims

- To provide a procedure for the handling of customer allegations of food poisoning and foreign body complaints.

Contents

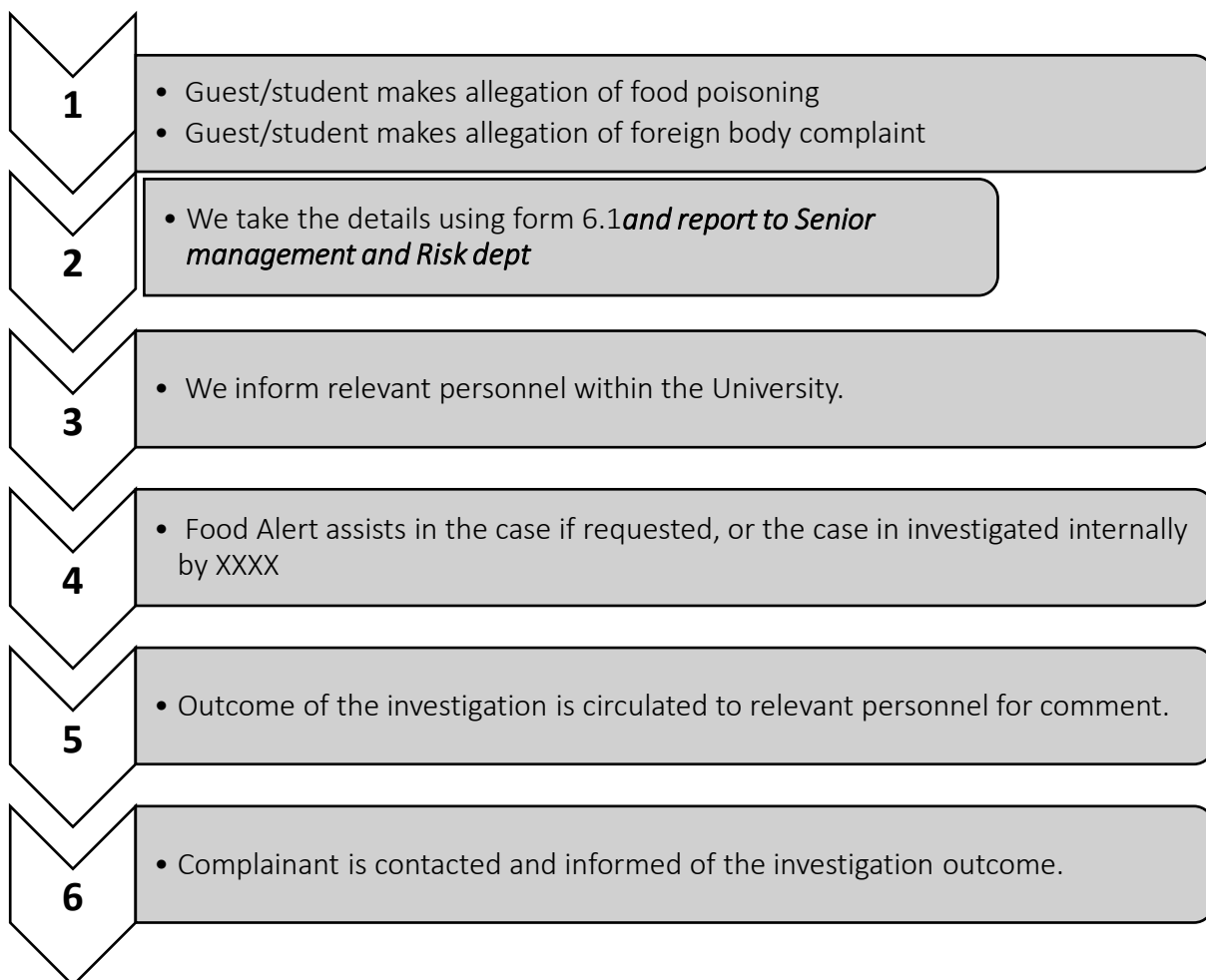
- Procedure for the handling of customer allegations of food poisoning and foreign body complaints.
- Handling product recalls.

Forms

Form no.	Title	Location
FH Form	Alleged food poisoning form	Appx 1



Procedure



Handling Product Recalls.

- **FSA** notifications are monitored and acted on.
- Supplier notices are monitored and acted on.
- If a chef or manager identifies a problem with any food that has been subject to an internal transfer both the receiving unit and Liverpool University services management are informed.
- Where final customers/students need to be informed of any recall this will be done via:
 - Social media channels.
 - Student bodies.
 - Site notices.
 - Assistance from Liverpool Council.

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Food Alert

3: LIVERPOOL UNIVERSITY CORE HACCP.



Aims

- To ensure compliance with Regulation (EC) 852/2004 as implemented by The Food Safety and Hygiene (England) Regulations 2013, taking into account the Industry Catering Guide Reg (EC) 852/2004 on the hygiene of foodstuffs.
- To introduce and describe the concept of Hazard Analysis Critical Control Points (HACCP).
- To analyse potential food hazards relating to the foods handled and served.
- To identify points which are critical for food safety – the Critical Control Points (CCPs).
- To specify control measures and ‘critical limits’ for the CCPs.
- To specify corrective actions to be taken if the CCP ‘critical limit’ is exceeded.
- To record reviews of the HACCP.

Contents

- 3.1: Introduction – What is HACCP?
- 3.2: The seven HACCP principle
- 3.3: Terminology
- 3.4: Structure of the HACCP documentation for each site
- 3.5: HACCP team
- 3.6: Reviews
- 3.7: Flow diagrams
- 3.8: Summary of Critical Control Points (CCPs)

Forms

Form no.	Title	This section	Appendix One
Table 3.1	HACCP team	✓	
Table 3.2	Reviews Summary	✓	
FH Form 3.1	HACCP review and update log		✓

3.1: Introduction - What is HACCP?

Hazard Analysis Critical Control Points (HACCP) is a Food Safety Management System that we use to ensure the food we sell to our customers is safe to eat.

It identifies what (and where) things can go wrong (the hazards) and where it is critical that we control them for food safety, i.e. preventing contamination and food poisoning.

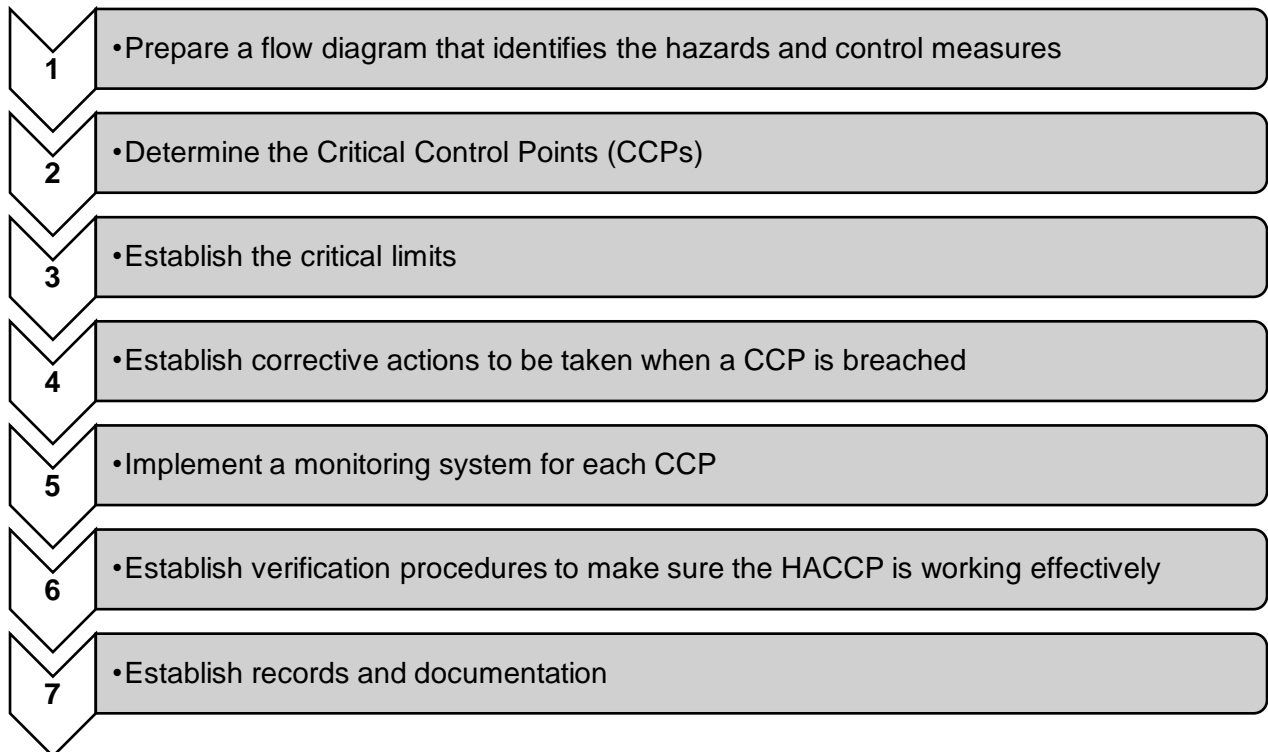
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The implementation of a Food Safety Management System based on these principles is a **legal requirement**.

It is important to note that we must document our HACCP and keep records to demonstrate that it is working effectively.

3.2: The seven HACCP principles



3.3: Terminology & Usage

Flow diagram

A diagram showing the sequence of steps or operations used in the production of the food.

Step

A stage in the food operation from purchase of ingredients through to serving the customer. For example, 'chilled storage'.

Hazard

Something with the potential to cause harm to the consumer – microbiological (e.g. bacteria, viruses), physical (e.g. glass), chemical (e.g. cleaning agent) or allergens (e.g. nuts).

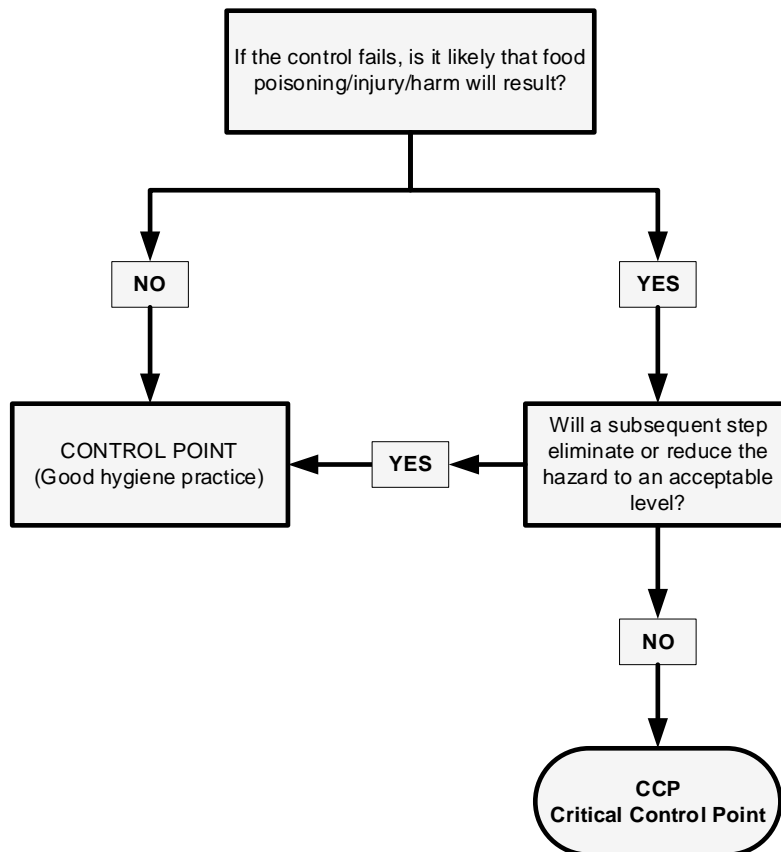
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Critical Control Point (CCP)

A step where control must be applied in order to prevent or eliminate a food safety hazard or reduce it to an acceptable level as it will not be removed at a later stage. For example, the chilled storage of high-risk food.

Simplified CCP decision chart



Control measure

Any action and activity that can be used to prevent or eliminate a food safety hazard or reduce it to an acceptable level. For example, keeping high-risk foods chilled effectively during storage.

Critical limit

The safety level outside of which is unacceptable and a corrective action must be taken. For example, the maximum legal temperature of high-risk food in a fridge is 8°C. For the purposes of this document, we have set a target temperature of 5°C and a critical limit of 8°C.

Corrective action

A process to be taken when the results of monitoring at the CCP indicate failure of control (i.e. the critical limit has been breached) eliminating the risk of reoccurrence. For example, discarding contaminated food.

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Monitoring

The checks we make to assess whether a CCP is under control. For example, daily fridge monitoring checks with a probe thermometer.

Verification

Obtaining evidence that our HACCP is working properly by carrying out audits, reviewing of critical limits, calibration of instruments used for monitoring, servicing of equipment, environmental swabbing and monitoring customer complaints.

3.4: Structure of the HACCP documentation for each site

Site documentation summary		
Title	Purpose	Site to complete
Section 1 Policy	Statement, roles and responsibilities, document control	No
Section 2 Pre-requisites	Hygiene and general safety programs	No
Section 3 HACCP	Critical control point analysis	No
Section 4 HACCP Summary Table* (see below)	Site foods related to the HACCP	Yes
Section 5 Allergen Policy	Control of allergens/information	Yes
Appendix 1 Forms	Monitoring	Yes

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***Example HACCP summary table.**

Student Guild (Rest) HACCP FLOWCHART SUMMARY TABLE: Current Menu Table – JUNE 2021				
Updated By:	Adrian Attey / Head Chef (Mark Fitzjones)	Period:	06/21	
High Risk Foods listed here are covered by the following standard HACCP tables. For non-standard food processes (e.g. Sous vide, smoking, curing, lightly cooked foods) see also the special HACCPs for these activities.				
FLOWCHART 1	FLOWCHART 2	FLOWCHART 3	FLOWCHART 4	FLOWCHART 5
Receipt/Store/ Prep/Serve Cold	Cook/Reheat To Order/ Serve Hot	Cook/Cool/ Serve Cold Or Ambient	Cook/Cool/ Reheat/Serve Hot	Cook/Reheat/ Hot Hold/Serve Hot
STAGE 2 – Temp ≤8°C STAGE 3 – Temp ≤8°C STAGE 4 – Time ≤2hrs	STAGE 5 - 75°C for 30secs	STAGE 5 - 75°C for 30secs STAGE 6 - ≤90mins cooling STAGE 3A - Temp ≤8°C	STAGE 5 - 75°C for 30secs STAGE 6 – Varied See HACCP table STAGE 3A - Temp ≤8°C STAGE 8 - 75°C – 30secs	STAGE 5 - 75°C for 30secs STAGE 7 - ≥63°C
<ul style="list-style-type: none"> Dairy products (milk, cream, cheeses). Yoghurt and Cheese dips. Slaws & salads 	<ul style="list-style-type: none"> Burgers Nachos. Assembly of burritos/wraps. 	<ul style="list-style-type: none"> Not used currently 	<ul style="list-style-type: none"> Beef chilli. Veg Chilli. 	<ul style="list-style-type: none"> Not used currently
Dishes for which cooking steps are not a control or for which there are other safety considerations				
TBC	SOUS VIDE LIGHT COOKING: TBC	SOUS VIDE LIGHT COOKING: TBC	SOUS VIDE LIGHT COOKING: TBC	SOUS VIDE LIGHT COOKING: TBC

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3.5: HACCP TEAM

Table 3.1: HACCP team. Date: XXXX		
Team member	Position	Competency

3.6: Reviews

All parts of the system are review appropriately as described below.

Table 3.3: Review summary		
Part	Frequency	Comments/Reviewer
Customer complaints	Monthly	
Monitoring records	Weekly	
Non-conformance/wastage	Weekly	
SOPs	Annual	
Pre-requisites	Annual	
HACCP	Annual	

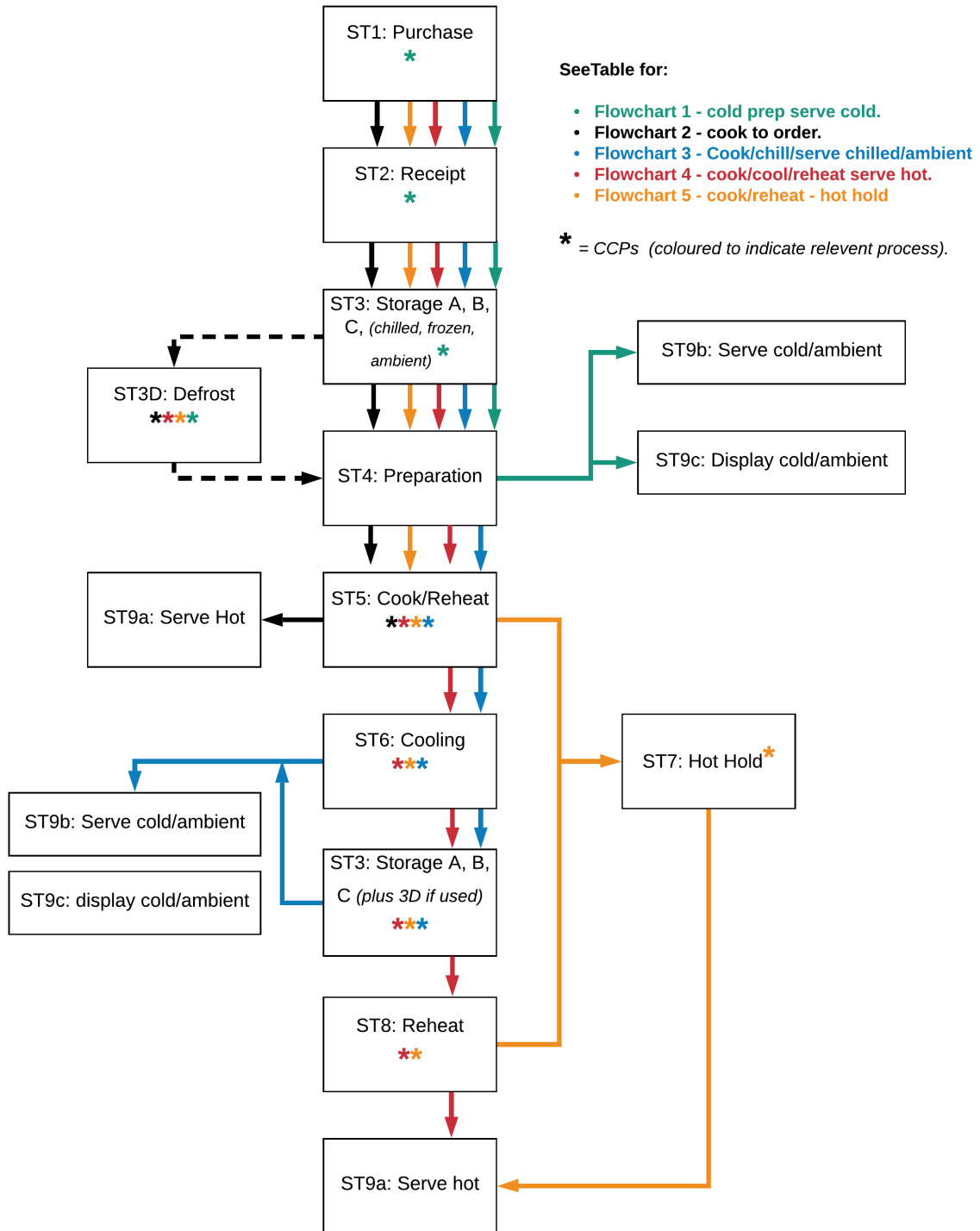
Reviews would also be prompted by:

- Patterns of minor complaints.
- Failures in any microbiological testing.
- Changes to legislation.
- Changes in enforcement approaches.
- Incident investigations.
- Major changes in:
 - Personnel.
 - Site layout/structure.
 - Equipment.
 - Food handling processes.

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3.7: Flow diagrams (for processes used at Liverpool University)



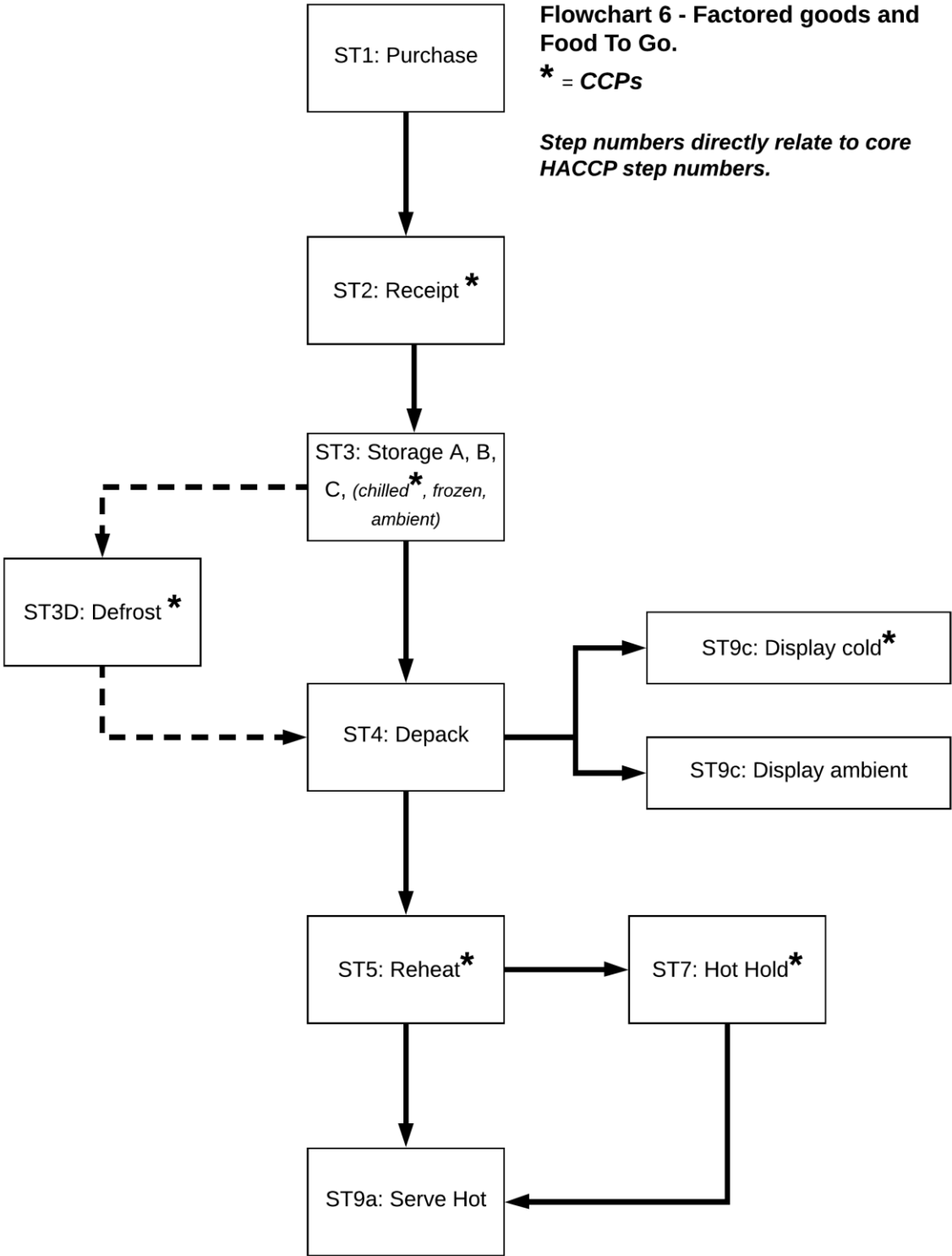
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Flowchart 6 - Factored goods and Food To Go.

*** = CCPs**

Step numbers directly relate to core HACCP step numbers.



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3.8: Summary of Critical Control Points (*Italics = CPs dealt with by pre-requisites*)

No	Step	Hazards	Controls	Monitoring		Critical limit	Corrective actions	Form no.
				Procedure	Frequency			
1	Purchase	<i>Contamination with food poisoning bacteria, physical or chemical contaminants.</i>	<i>High-risk foods purchased from approved supplier</i> <i>Specifications for conditions of delivery</i> <i>Assessment of returned food safety information</i> <i>Supplier audits when appropriate</i>	<i>Supplier approval procedure followed (see section 3 for further details)</i>	<i>All suppliers of high-risk food</i> <i>Review every 2 years</i>	<i>No deviation from specifications</i> <i>Supplier must supply satisfactory documentation</i>	<i>Change supplier if necessary</i> <i>Return food</i>	
2	Receipt CCP F1,3	Growth of food poisoning bacteria	High-risk foods delivered chilled below 5°C and frozen foods below -15°C	Record delivery temperature	One high risk product from each delivery	Chilled food: at or below 8°C. Frozen food: at or below -15°C	Rejection of delivery Inform supplier	DD
		<i>Physical or chemical contamination</i>	<i>Food covered and protected</i>	<i>Observation</i>	<i>Each delivery</i>	<i>Absence of contamination</i> <i>Packaging intact</i>	<i>Rejection of delivery</i> <i>Inform supplier</i>	

No	Step	Hazards	Controls	Monitoring		Critical limit	Corrective actions	Form no.
				Procedure	Frequency			
3A	Chilled storage CCP: F1, 3, 5, 6	Growth of food poisoning bacteria and spoilage of food	Stored in fridge at or below 5°C. Stock rotation and foods used within shelf-life	Record fridge temperatures Once a week check food temperatures Visual checks	Twice a day During the day	CL - 8°C. Target Limit (TL) 5-8°C.	If food is between 5-8°C, fridge adjusted and rechecked after 30mins. If food is still between 5-8°C, move to another fridge which is holding food at 5°C or less. Discard any high risk food >8°C. Discard out of date food. Record corrective actions taken.	DD/ wastage log
		Contamination with food poisoning bacteria, physical or chemical contaminants	Separation of non-RTE and RTE foods Covering of foods Glass policy/chemical policy/maintenance/cleaning schedule	Observation	During the day	Absence of contamination	Discard contaminated food	
3B	Frozen storage CCP F1.	Growth of bacteria	Stored in freezer at -18°C Ice-cream in a service freezer can be held at -12°C for no longer than one month	Freezer temperature recorded (see section 4 for further details)	Twice a day	At or below – 15°C Ice must not rise above -8°C.	Temperature adjusted and rechecked in 30 minutes. Soft frozen food to be used immediately or discarded. Record corrective actions taken.	DD/ wastage
3C	Dry goods storage	Contamination by spoilage bacteria, chemicals, pests and physical contaminants	Food covered during storage	Observation	Daily	Absence of contamination All food covered	Discard contaminated or infested food	

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No	Step	Hazards	Controls	Monitoring		Critical limit	Corrective actions	Form no.
				Procedure	Frequency			
3D	Defrosting CCP.	Growth of food poisoning bacteria in high risk foods	Defrosting of food under temperature controlled conditions (i.e. in the fridge at or below 5°C)	Temperatures checked of chilled storage	Twice a day	Fridge CL 8°C TL- 5°C Thawing cabinet 12°C	If food is between 5-8°C, fridge adjusted and rechecked after 30mins. If food is still between 5-8°C, move to a fridge which is holding food at 5°C or less. Discard any high risk food >8°C. Discard out of date food. Record corrective actions taken.	DD
		<i>Contamination with food poisoning bacteria, physical or chemical contaminants</i>	<i>Separation of non-RTE and RTE foods</i> <i>Covering of foods</i> <i>Glass policy/chemical policy/maintenance/cleaning schedule</i>	<i>Visual inspection</i>	<i>During the day</i>	<i>Absence of contamination</i>	<i>Discard contaminated food</i>	
4	Preparation	Growth of food poisoning bacteria in high-risk foods left at ambient	Restrict time high-risk foods left at ambient	Observation	During the day	Max. time at ambient = 2 hours	Discard high-risk food left at room temperature >2 hours	
		<i>Contamination of high risk food with food poisoning bacteria</i> <i>Contamination of food with physical or chemical contaminants</i>	<i>Separation of non-RTE and RTE activities by equipment and disinfection</i> <i>Glass policy/chemical policy/maintenance/cleaning schedule</i>	<i>Visual checks</i>	<i>Throughout preparation</i>	<i>Absence of contamination</i>	<i>Contaminated food discarded</i>	

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No	Step	Hazards	Controls	Monitoring		Critical limit	Corrective actions	Form no.
				Procedure	Frequency			
7	Hot hold CCP where used.	Growth of food poisoning bacteria	Food held hot	Probing of food	Every two hours during service	At or above 63°C	Temperature of hot holding equipment adjusted Discard any food <63°C for >2 hours	DD
		<i>Contamination of food with food poisoning bacteria, physical or chemical contaminants</i>	<i>Glass policy/chemical policy/maintenance/cleaning schedule/sneeze screens</i>	<i>Visual checks</i>	<i>During service and display</i>	<i>Absence of contamination</i>	<i>Contaminated food discarded</i> Record corrective actions taken	
8	Re-heating CCP F4, 5.	Survival of food poisoning bacteria	Thorough cooking	Probing of food	Two high risk items every service	Core temperature of: • 75°C for 30 seconds	Reheated until specified temperature is achieved.	DD
9a	Serve hot	<i>Contamination of food with food poisoning bacteria, physical or chemical contaminants</i>	<i>Pre-reqs: 2.4, 2.5, 2.7</i>	<i>Visual checks of food by server/food handler</i>	<i>Each dish</i>	<i>Absence of contamination</i>	<i>Contaminated food discarded</i>	wastage
9b	Serve cold/ambient	<i>Contamination of food with food poisoning bacteria, physical or chemical contaminants</i>	<i>Pre-reqs: 2.4, 2.5, 2.7</i>	<i>Visual checks of food by server/food handler</i>	<i>Each dish</i>	<i>Absence of contamination</i>	<i>Contaminated food discarded</i>	wastage

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No	Step	Hazards	Controls	Monitoring		Critical limit	Corrective actions	Form no.
				Procedure	Frequency			
9ci	Display cold CCP F1,3	Growth of food poisoning bacteria in high risk food	Food held under chilled conditions at 8°C	Probing of food	Every 4 hours during service	8°C	<p>If food above 8°C, food moved to another fridge which is capable of keeping below 5°C if storage fridge, and 8°C if display fridge.</p> <p>Display fridge adjusted and rechecked after 30mins and only bought back into use when capable of holding food at 8°C or less.</p> <p>Where display fridges are not capable of holding food at 8°C or less, Food must revert to step 9cii instead or be discarded.</p> <p>Foods only re-cooled once</p> <p>Record corrective actions taken.</p>	DD
		<i>Contamination of food with food poisoning bacteria, physical or chemical contaminants</i>	<i>Glass policy/chemical policy/maintenance/cleaning schedule</i>	<i>Visual checks</i>	<i>During the day</i>	<i>Absence of contamination</i>	<i>Contaminated food discarded</i>	
9cii	Display ambient	Growth of food poisoning bacteria on high risk food	Food held for a limited period	Timed service	Every service	Maximum 4 hours >8°C	<p>Discard food or sell from storage refrigerator operating to keep food at 5°C</p> <p>Record corrective actions taken</p>	DD
		<i>Contamination of food with physical or chemical contaminants</i>	<i>Glass policy/chemical policy/maintenance/cleaning schedule</i>	<i>Visual checks</i>	<i>During the day</i>	<i>Absence of contamination</i>	<i>Contaminated food discarded</i>	

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No	Step	Hazards	Controls	Monitoring		Critical limit	Corrective actions	Form no.
				Procedure	Frequency			
10	Internal deliveries of cold foods (where used)	Growth of food poisoning bacteria on high-risk food	Temperature controlled delivery	Chilled vehicle checks Dispatch checks Receiving site temp check	Each delivery	Vehicle TL - 5°C CL - 8°C Despatch 5°C Receipt 8°C	Adjust vehicle controls Re-cool foods to less than 5°C If over 8°C on despatch use foods within 4hrs or discard. Reject transfer/delivery	VC DD
		<i>Contamination of food with food poisoning bacteria, physical or chemical contaminants, during loading and transit</i>	<i>Foods packaged / covered during delivery process</i> <i>Pre-reqs: 2.5, 2.7, 2.13</i>	<i>Visual checks for signs of damage / deterioration.</i>	<i>Each delivery</i>	<i>Absence of visual contamination</i>	<i>Reject transfer/delivery</i>	<i>wastage</i>

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[SITE] HACCP FLOWCHART SUMMARY TABLE:

Current Menu Table – XXX

Updated By:	Adrian Attey / Head Chef	Period:	05/18
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*High Risk Foods listed here are covered by the following standard HACCP tables.
For non-standard food processes (e.g. Sous vide, smoking, curing, lightly cooked foods) see also the special HACCPs for these activities.*

FLOWCHART 1	FLOWCHART 2	FLOWCHART 3	FLOWCHART 4	FLOWCHART 5
Receipt/Store/ Prep/Serve Cold	Cook/Reheat To Order/ Serve Hot	Cook/Cool/ Serve Cold Or Ambient	Cook/Cool/ Reheat/Serve Hot	Cook/Reheat/ Hot Hold/Serve Hot
STAGE 2 – Temp ≤8°C STAGE 3 – Temp ≤8°C STAGE 4 – Time ≤2hrs	STAGE 5 - 75°C for 30secs	STAGE 5 - 75°C for 30secs STAGE 6 - ≤90mins cooling STAGE 3A - Temp ≤8°C	STAGE 5 - 75°C for 30secs STAGE 6 – Varied See HACCP table STAGE 3A - Temp ≤8°C STAGE 8 - 75°C – 30secs	STAGE 5 - 75°C for 30secs STAGE 7 - ≥63°C
<ul style="list-style-type: none"> Dairy products (milk, cream, cheeses). Yoghurt and Cheese dips. House slaw. <p>(General prep and low risk items covered by pre-requisites).</p>	<ul style="list-style-type: none"> Burgers 	<ul style="list-style-type: none"> XXX 	<ul style="list-style-type: none"> Soup XXX 	<ul style="list-style-type: none"> XXX

Dishes for which cooking steps are not a control or for which there are other safety considerations

TBC	<i>SOUS VIDE LIGHT COOKING:</i>	<i>SOUS VIDE LIGHT COOKING:</i>	<i>SOUS VIDE LIGHT COOKING:</i>	<i>SOUS VIDE LIGHT COOKING:</i>
	TBC	TBC	TBC	TBC

Student Guild (Rest) HACCP FLOWCHART SUMMARY TABLE:

Current Menu Table – JUNE 2021

Updated By:	Adrian Attey / Head Chef (Mark Fitzjones)	Period:	06/21
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*High Risk Foods listed here are covered by the following standard HACCP tables.
For non-standard food processes (e.g. Sous vide, smoking, curing, lightly cooked foods) see also the special HACCPs for these activities.*

FLOWCHART 1	FLOWCHART 2	FLOWCHART 3	FLOWCHART 4	FLOWCHART 5
Receipt/Store/ Prep/Serve Cold	Cook/Reheat To Order/ Serve Hot	Cook/Cool/ Serve Cold Or Ambient	Cook/Cool/ Reheat/Serve Hot	Cook/Reheat/ Hot Hold/Serve Hot
STAGE 2 – Temp ≤8°C STAGE 3 – Temp ≤8°C STAGE 4 – Time ≤2hrs	STAGE 5 - 75°C for 30secs	STAGE 5 - 75°C for 30secs STAGE 6 - ≤90mins cooling STAGE 3A - Temp ≤8°C	STAGE 5 - 75°C for 30secs STAGE 6 – Varied See HACCP table STAGE 3A - Temp ≤8°C STAGE 8 - 75°C – 30secs	STAGE 5 - 75°C for 30secs STAGE 7 - ≥63°C
<ul style="list-style-type: none"> Dairy products (milk, cream, cheeses). Yoghurt and Cheese dips. Slaws & salads <p>(General prep and low risk items covered by pre-requisites).</p>	<ul style="list-style-type: none"> Burgers Nachos. Assembly of burritos/wraps. 	<ul style="list-style-type: none"> Not used currently 	<ul style="list-style-type: none"> Beef chilli. Veg Chilli. 	<ul style="list-style-type: none"> Not used currently

Dishes for which cooking steps are not a control or for which there are other safety considerations

TBC	<i>SOUS VIDE LIGHT COOKING:</i>	<i>SOUS VIDE LIGHT COOKING:</i>	<i>SOUS VIDE LIGHT COOKING:</i>	<i>SOUS VIDE LIGHT COOKING:</i>
	TBC	TBC	TBC	TBC

Food Alert



4: Allergen Policy & HACCP 05/22

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Content

i. Introduction and background

- a. Food law and allergies.
- b. Which allergens need to be labelled?
- c. Our food allergies policy
- d. Collecting and recording the information
- e. 'May contains'
- f. Pre-packed for Direct Sale Foods (PPDS)

1. Aims.

- 1.1. Reminders for general good practice.

2. Site FOH procedures and pre-requisites

- 2.1. Mandatory Control table.
- 2.2. Site detailed measures table.

3. Site Specific HACCP

- 3.1. Flow chart.
- 3.2. Control Table.

i. Introduction and background

a. Food law and allergies

The EU Food Information for Consumers Regulation 1169/2011 EC (EU FIC) was enforced on 13th December 2014 and is applied by the Food Information Regulations 2014 (FIR), and the Food Information (Amendment) (England) Regulations 2019 in the UK.

This legislation obliges us to provide information regarding the 14 specified allergens to our customers. Individuals may also have allergies and intolerances to a wide range of other foods that are outside of the 14 specified allergens which may also cause illness or death. It is our responsibility to ensure that a particular allergen is not included if requested by a customer (or advise the customer that a request cannot be addressed for a particular food).

From 1st October 2021, the requirements for prepacked for direct sale (PPDS) food labelling changed in Wales, England, and Northern Ireland. We will comply with changes to the Food Information (Amendment) Regulations 2019, where food which is Prepacked for Direct Sale (PPDS) must be labelled with a list of ingredients, including emphasised allergens. This change is called 'Natasha's Law' and will apply to England, Wales, Northern Ireland and Scotland

It is vital that accurate allergen information is available when purchasing food and for PPDS food this will be provided as a label on the products. We will identify any foods that are prepacked for Direct sale. Prepacked for direct sale or PPDS is food which is packaged at the same place/site it is offered or sold to consumers and is in this packaging before it is ordered or selected.

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This information relates to ingredients used in the preparation of the foods we serve but does not include substances that may be present through cross-contamination. However, although not required by this law, we must inform our customers of any potential contamination of ingredients due to the nature of their production when identified by our suppliers. There is a general requirement to sell food that is safe and of the substance demanded without misleading customers. In order to achieve this, cross-contamination risk needs to be assessed, managed and communicated.




Allergen information can be supplied in a number of ways for non-prepackaged foods. If the information is not visible, it must be clear that the information can be obtained by: asking a member of staff, by means of a notice, a statement on the menu, or label that can easily be seen by customers, as well as in other formats made available to the consumer e.g. on our website or on an event booking form. The mandatory allergen information must be made available at point of order and delivery for takeaways.

It is not appropriate to advise customers that we do not have knowledge of allergens for foods that we serve, nor is it acceptable to say that all our foods may contain allergens. Allergen information must be specific, complete and accurate to the food. In practice, it is necessary to provide correct allergen ingredient information for individual items on a buffet for example, and not just a general list for all the food served.








Inaccurate or incomplete information about allergenic ingredients used in foods sold non-pre-packed (or pre-packed for direct sale) would be a breach of the regulations and could result in penalties. It is also possible that a customer who has suffered an allergic reaction to a food may take legal action and make a claim.

b. Which food allergens need to be labelled?





14 foods have been listed on Annex II of Regulation 1169/2011 EC.

Allergen	Also known as	Can be found in
Celery and celeriac 	Celery stalk, leaves, seeds and powder	Bread, cakes, biscuits, baking powder, pastry, pasta, noodles, fruit drinks, beer, soya sauce, sausages, modified starch, cereal binder, rusk, confectionery, cheese spread, sauces and gravy
Cereals containing gluten (found in wheat, barley, rye, spelt and kamut) 	Bran, bulgar, cereal binder, couscous, flour (made from barley, rye and wheat), malt, rusk, semolina, wheat starch, modified wheat starch	Bread, cakes, biscuits, baking powder, pastry, pasta, noodles, fruit drinks, beer, soya sauce, sausages, modified starch, cereal binder, rusk, confectionery, cheese spread, sauces and gravy
Crustaceans 	Prawns, lobster, crab, crayfish, langoustine	Shrimp paste, Chitosan and in South East Asian, Japanese, Thai, Chinese, Indian, USA and English dishes

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<p>Eggs</p> 	<p>Albumin, conalbumin, eggs (from all birds), egg white, egg yolk, dried egg, ovalbumin, ovomucoid, ovoglobulin, vitellin and vitellenin</p>	<p>Cakes, biscuits, pastries, crème caramel, batter, desserts, custard tarts, brioche, glazes on desserts, egg noodles and pasta, ice cream, margarine, meringue, pancakes, waffles, quiches, soufflés, cocktail glass rims.</p>
<p>Fish (all species of fish)</p> 		<p>Fish sauce, fish oil, omega-3 rich oils, fish gelatine, fish paste, anchovy sauce, caviar, Worcester sauce, South East Asian dishes, salad dressings, pizzas, relishes</p>
<p>Lupin</p> 	<p>Lupin seeds, lupin beans and lupin flour</p>	<p>Pastry, pies, pancakes, products containing rusk, pizza</p>
<p>Milk</p> 	<p>Lactose, lactic acid, whey, casein and caseinates</p>	<p>Bread, cakes, skimmed milk powder, cheese, crème fraiche, fromage frais, ghee, ice cream, crisps, crème caramel, biscuits, batter, artificial cream, animal fat, various desserts including some sorbets, margarine & low fat spread, ready meals, white sauces, sweeteners, vegetable fats, mascarpone, quark, chocolate and chocolate products</p>
<p>Molluscs</p> 	<p>Abalone, squid, cuttlefish, octopus, snails, clam, oysters, scallops, cockles, mussels, whelk</p>	<p>Italian and French dishes, oyster sauce, other fish-based sauces and stocks</p>
<p>Mustard</p> 	<p>Mustard paste, mustard powder, mustard seeds, mustard leaves, sprouted mustard, mustard oil</p>	<p>Curry powders and mixes, savoury sauces, salad dressing, marinades, soup, Indian dishes, English, French and American dishes</p>
<p>Tree nuts</p> 	<p>Almond, Brazil nut, cashew, hazelnut, macadamia or Queensland nut, pecan, pistachio, walnut</p>	<p>Sauces, desserts, crackers, bread, ice-cream, marzipan, nut oil, nut essence, nut butter, chocolate, baked goods, cakes, biscuits, bread, Greek and Arabic dishes</p> <p>Note: The following are not nuts: pine nuts (seeds), nutmeg, chufa nuts, coconut (coconut is a palm), chestnut. However they often share shelling and production facilities with tree nuts and may carry cross contamination. We should advise our customers if the supplier informs us of a risk.</p>

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<p>Peanuts</p> 	<p>Groundnuts, monkey nuts, arachide, arachis oil, beer nuts, cacahuete, earth nuts, goober nuts/peas, mondalona nuts</p>	<p>Almond powder, chopped almonds, loose bakery products, cakes, chocolates, sauces, curry sauces, desserts, marzipan, peanut butter, satay sauce, Chinese and Indian dishes.</p>
<p>Sesame</p> 	<p>Benne, gingelly, gomashio, teel</p>	<p>Sesame oil, sesame paste, bread, oriental seasonings, hummus, tahini, halva, aqua libra, crackers, buns, bagels, energy snacks, vegetarian dishes, ready-meals, Chinese, Indian, Greek, Mexican and Lebanese Foods</p>
<p>Soya</p> 	<p>Soya beans, soya flour, soya meal, soya milk, soya lecithin, miso, cold pressed soya, soya sauce, tofu, edamame beans</p>	<p>Bread, biscuits, cakes, lecithin, teriyaki sauce, vegetable protein, emulsifiers, ice cream, chocolate, desserts, and vegetarian products</p>
<p>Sulphur Dioxide (Sulphites) above 10mg/kg or 10mg/litre</p> 	<p>E220 (Sulphur dioxide), E221 Sodium sulphite, E222 Sodium hydrogen sulphite, E223 Sodium metabisulphite, E224 Potassium metabisulphite, E226 Calcium sulphite, E227 Calcium hydrogen sulphite, E228 Potassium hydrogen sulphite, E150b Caustic sulphite caramel, E150d Sulphite ammonia caramel.</p>	<p>Foods as a preservative, dried fruit and vegetables, soft drinks, fruit juices, fermented drinks (wine, beer and cider), sausages and burgers.</p>

Note:

This list was originally devised for the member states of the EU. Food allergies vary between populations and in different countries. For example, celery and mustard allergies are rarely reported in the UK, in comparison to peanut and tree nut reports which are more common.

The following foods are not on the list above but are reported to be causing more allergies in the UK:

- Kiwi fruit
- Banana
- Peas
- Lentils
- Chickpeas
- Other legumes – beans
- Tomato
- Mushroom

It is therefore important that we are ready to deal with enquiries about allergens that may not be on the list of 14 above, and that the manager or nominated person is able to assist.

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'Gluten free'

A specific Commission Regulation (EC) 41/2009 concerns the composition and labelling of foodstuffs which specifies that food businesses can only use the claim 'gluten-free' where the level of gluten is 20mg/kg or less). Therefore, we check that a product meets this requirement before we make the claim.

Staff allergy considerations

- Staff members may have or develop allergies to particular foods and may need support to avoid certain foods.
- They should be supported to manage any reactions in the workplace. This will include a protocol for helping them store, manage and use medication and may also involve calling paramedics.

c. Our food allergies policy

We, The University of Liverpool:

- Recognise the potentially life-threatening risks that are associated with food allergies.
- Comply with the requirements of the Food Information Regulations 2014 and other food laws which may protect people with allergies and intolerances. This includes food the Food Information (Amendment) (England) Regulations 2019, 'Natasha's Law'.
- Document the allergens present in the foods we serve by liaising with our suppliers and collating the information through ingredients specifications and labels.
- Document the allergens present in food which are Prepacked for Direct Sale (PPDS). Products must be labelled with a list of ingredients, including emphasised allergens.
- Identify the specific allergens where we have groups of foods such as cereals, crustaceans, fish, nuts and molluscs.
- Will liaise with suppliers to ensure we have accurate allergy information from them in order to pass this onto our customers.
- Ask suppliers to notify us of any changes to the relevant allergen information as soon as possible and in writing.
- Include relevant information where suppliers have identified their foods 'may contain' allergen contamination through risk assessments (see "may contains" note below). In these circumstances, we ensure the customer is made aware.
- Warn customers of the potential of cross-contamination within our food preparation areas and advise them what controls we have in place to reduce risks.
- Provide clear and accurate ingredients information on the 14 allergens for every dish on our menu or unpackaged products and make sure it is available for all of our customers.
- Ensure there are trained staff/managers available on each shift to manage customer requests and ensure the correct food is served.
- Ensure all members of staff know where the allergen information is kept and have knowledge of the nominated person in the event of an enquiry.
- Make sure all staff have received basic training about the procedure to follow in the event of a customer making an enquiry regarding potential allergens in foods.
- Follow the correct procedure when preparing food for customers who have requested specific allergen-free food.

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- Regularly communicate all ingredient changes with our staff and customers.
- Put into place an emergency protocol for allergic reactions.

d. Collecting and recording the information

We request allergen information from our suppliers and utilise the labels on the packaging which specify their presence. The information is logged on the allergens matrix.

e. 'May contain'

The legislation refers specifically to allergens present in food ingredients only.

A real risk of cross-contamination may also be identified for a particular allergen through the risk assessment process completed by the supplier. This information should be brought to the attention of consumer and logged on Alert65 or the allergens matrix (marking with 'M').

Cross-contamination can also occur within the kitchen itself and it would be appropriate to add a statement to the menu/signage to inform customers. An example would be:

If you have any specific dietary requirements or require allergy information, please ask your server. However, please be aware that food containing allergens are prepared and cooked in our kitchen.

f. Pre-packed for Direct Sale Foods (PPDS)

Food is 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

If we transfer packaged food within the same food businesses on the same premises/site it is PPDS and will be labelled as such.

If food is packaged by us and sold at a temporary or mobile site, such as a food truck or market stall, it is PPDS and will be labelled as such.

Foods that are not PPDS

For foods that are not PPDS we will continue to follow the legal requirements for provision of allergy information/labelling.

This includes

- Loose foods - food that is not in packaging
- Food that is packaged after being ordered by the customer

These non-prepacked foods will be provided with the name of the food and presence of any of the 14 allergens. This will be provided to consumers using a notice, on a ticket, on a label that at the place where the purchaser chooses that food.

We will also provide signposting for customers on how/where to find the information.

- Prepacked Food (packed by one business and supplied to another business) will have full labelling, including the name of the food and a full ingredients list, with allergenic ingredients emphasised within it.

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- Food sold by distance selling and meal kits - we will provide allergen information before the purchase of the food is completed (on a website, catalogue or menu) or orally by phone and when the food is delivered - in writing (allergen stickers on food or an enclosed copy of a menu) or orally by phone).
- Buffets - We will provide allergen information for each food item separately.
- Takeaway food - we will provide allergen information at the point of ordering and will clearly label meals for customers with allergies so customers know which dishes are suitable for those with an allergy.

In order to check if food is PPDS we will use the FSA flow diagram on identifying PPDS food and answer the following questions:

1. Is the food presented to the consumer in packaging?
2. Is it packaged before the customer selects or orders the food?
3. Is it packaged at the same place it is sold?

If the answer is yes to all of these questions it is PPDS food and will require PPDS labelling.

Our PPDS Food Labels

Our labels for PPDS food will show:

1. The name of the food
2. Ingredient lists including the emphasis in **bold** of any of the 14 specified allergens headed with the word ingredients. The list will include ingredient subcomponents in full, including branded items and sub recipes

List of Ingredients

Our ingredients lists will be in the minimum font size; conspicuous, visible and legible.

The list of ingredients will be headed or preceded by the word or a sentence containing the word 'ingredients'.

In our list of ingredients, we will provide information if any of the foods/ingredients detailed in the EU Regulations are used in the preparation of food we supply.

Allergen information will be specific to the food, complete and accurate.

Allergens will be emphasised in **bold** type.

The ingredients used will be listed in descending order of weight at the time the product was made.

The type of nut and the type of cereal containing gluten will also be specified.

Font Size

- Characters on the label have a font size where the x-height is equal to or greater than 1.2 mm.
- In cases of packaging or containers where the largest surface of which has an area of less than 80 cm², the x-height of the font size shall be equal to or greater than 0.9 mm

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Our labels will be clearly visible and legible and placed on the outside of the packaging. Where possible we will use printed food labels. In circumstances where we have to hand write labels, we will ensure that they meet the legal font size requirements and will be clearly legible.

Suppliers

We will have an up-to-date list of approved suppliers.

We will only use suppliers who are able to provide full ingredient and allergy information and we will request that they tell us quickly of any changes to ingredients and allergens in their products. We will have internal procedures so that this information is quickly transferred to our products and PPDS labels.

Training

We will ensure that all our staff are trained in Natasha's Law, the 14 legal allergens and their responsibilities. We will train them on our internal procedures and on all software and hardware that we use to label our products. We will ensure that everyone knows what to do if an ingredients allergy information changes and checking allergy information will be part of our goods in process.

Checks

We will carry out spot checks on our PPDS foods and include these checks as part of our internal audits.

Our consultancy Food Alert will check compliance on their third-party audits.

1.0: Aims

Provides detail showing how the Allergen Policy is implemented at a site level. This supports:

- Compliance with legal requirements to control and manage allergens within the business related to the entire guest experience.
- To prevent the risk of food reactions in people with food allergies/intolerances.
- To support and enable all staff to manage food allergen information, understand customer requirements and control allergen cross contamination appropriately.
- To specify the allergen controls using a HACCP based approach.

1.1: Reminders for general good practice

- Know the ingredients in each of your recipes and understand your supply chain
- Ensure all allergy information is up to date, clear and easy to understand
- Have a clear process for dealing with customer orders and the training/supervision of staff members.
- Operate clear kitchen protocols, checks and audits and ensure the risk of cross contamination is controlled at all stages of food receipt, storage, preparation and service
- Ensure cleaning is effective and consistent.

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2.0: Site FOH Procedures and pre-requisites.

2.1: Mandatory Control Table

Requirement	Provision	Confirmed date	Signed
Allergen information availability			
<p>Information must be available for all dishes/drinks and detail the known allergens that they do or may contain</p>	<p>The recipes for every dish/cocktail should be assessed and detailed checks made of constituent raw materials to ensure that the allergens contained within each dish are known. These checks should be recorded in either a matrix format or on a recipe specification sheet.</p> <p>Such information only needs to be available for the 14 known allergens. (Including additional allergens e.g. strawberries, kiwi etc. is not required).</p> <p>Allergen information on matrices or product specification/recipe sheets must be current and must include any specials or one-off dishes.</p> <p>Pre-packaged and pre-packed for direct foods must show allergen and ingredient information on the label (e.g. crisps, nuts, bottled/canned drinks).</p> <p>Allergen matrices are dated to allow tracking of current versions.</p>		
<p>Staff must be aware of where allergen information is located/stored</p>	<p>Designated/all staff within the business have been advised where to locate and how to interpret the allergen matrices.</p> <p>Allergen information should be easy to locate and be provided within a timely manner to customers. Allergen information is provided on allergen cards in catered halls and the Guild of students – all other campus outlets have an allergen file on site.</p> <p>There is no legal requirement for staff to assist customers with their decisions, but the information provided must be clear and easy to understand.</p> <p>LOCATIONS OF MATRICES:</p> <p>Staff must be able to explain the information on the matrix (terminology only NOT decision making).</p>		

Requirement	Provision	Confirmed date	Signed
Information notices and menus			
Customers alerted of allergen presence on the premises and advised to speak to staff for further details	<p>A directional statement advising customers that they can discuss allergens with staff before ordering should be available.</p> <p>This may include the provision of statements on chalkboards or menu's, a sign at the point of sale or via a verbal communication at the point of ordering.</p> <p>As an example, a statement at point of sale may simply state 'For information regarding allergens, please ask a member of staff'.</p> <p>There can be many variations in the wording of any statements, but the principle must be to inform guests of the need to ask for information and that it will be provided.</p> <p>Any directional signage must be clear, easy to read, be in clear view and be unambiguous.</p>		
Customers must be given information upon request as to which allergens are contained within any food items that they may be considering ordering.	<p>Where customers enquire whether allergenic ingredients are contained within any food items on your menu, it is legally required that you provide this information. It is not acceptable to state that you do not know. This requirement only extends to the 14 known allergens.</p> <p>Where food can be ordered online for direct delivery on your own website (not via third party platforms), allergen information should be available at the point of sale on the website.</p> <p>Products which are pre-packed for direct sale are provided with a label detailing the name of the food, a full list of ingredients in descending order, and allergens clearly highlighted in BOLD</p>		
Staff must receive training in regard to allergens and handling allergen enquiries	<p>Staff must be provided with access to training. There are no prescribed courses or specific training formats i.e. classroom training, e-learning or in job training.</p> <p>However, staff must undertake allergen training that deals with food preparation and service – training should be relevant to the role i.e. front of house staff who do no food preparation do not necessarily need to be trained in where to store allergenic ingredients for example. All staff should be trained on Natashas law.</p> <p>Staff must undertake allergen training prior to starting food preparation or service.</p>		

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Requirement	Provision	Confirmed date	Signed
Food delivered as stated	Customers are provided with food as intended and with the absence of allergens as per request Staff trained in order of service		
Disclaimers are permitted by food businesses that cannot control allergens within reason	Disclaimers are factual Disclaimers do not seek to remove legal responsibilities Disclaimers do not seek to restrict customers right to freedoms Disclaimers do not seek to restrict information Disclaimers do not seek to shift responsibilities to individuals / customers		

2.2: Sited detailed measures table. (SITE TO AMEND AS APPROPRIATE)

1	Menus	Measures
	Customers alerted of allergens presence	<ul style="list-style-type: none"> • Menus contain all allergen information in symbol or abbreviated format alongside dish • All products made within the central kitchen for direct sale through campus outlets are correctly labelled • Menus have clear colours and text size in regard to allergen advice alongside menu text • Menus do not seek to confuse ingredients with novel wording • Menus are in clear language reducing customers to seek clarification of ingredients or meaning • Menus include product description as well as title of dish • Separate matrix of allergens in dishes is provided by paper copy / tablet / app etc.

2 Allergen matrices	Measures
	<ul style="list-style-type: none"> • Allergen matrices have pictorial allergen advice • Allergen matrices a have additional allergens above 14 listed allergens • Allergen matrices versions are colour coded and have review dates to easily spot the correct current version. • Allergen matrices are reviewed by a competent person • Allergen matrices are made by a single person and verified separately by another individual
3 Guest Notification & ordering	Measures
Guests are advised of allergens	<ul style="list-style-type: none"> • All guests are proactively asked if they have any allergy queries at point of: <ul style="list-style-type: none"> ○ Entry ○ Service. • Menus are available in large font format with persons with reduced visibility impairment • Products which are pre-packed for direct sale are provided with a label detailing the name of the food, a full list of ingredients in descending order, and allergens clearly highlighted in BOLD
Allergen signposting	<ul style="list-style-type: none"> • Allergen signposting at entry is undertaken for premises that have open containers of allergens (peanuts and the like) in pictorial and written format to ensure that guests that have allergies do not enter without prior knowledge • Allergen information signposting requesting that guest speak to staff in regard to allergens is clearly displayed at: <ul style="list-style-type: none"> ○ Entry. ○ Table fliers. ○ Menu. ○ Posters.

Allergen ambassadors	<ul style="list-style-type: none"> • Only staff that have been allocated as allergen ambassadors are to provide allergen information in regard to dishes and suitability • Only staff that have been allocated as allergen ambassadors are to co-ordinate service delivery to guests' inclusive drinks and overview of utensils, plates and glassware that can be assured as cleaned and sanitised • Where identified, foods are not delivered to adjacent tables with known allergens (exclusions) • Allergen ambassadors oversee ordering and delivery of adjacent tables foods where a life-threatening allergy has been identified
Allergen recipe sheets	<ul style="list-style-type: none"> • Where guests are unsure of dishes due to names a recipe sheet should be given, this will identify all ingredients in both common and novel terminology (limits quantities and processes) to ensure that the guest is able make a more informed decision.
Photographic allergen matrices	<ul style="list-style-type: none"> • Allergen matrices are provided with a photo of the dish, assisting both staff and guests as to what may contain the known allergens • Photographic allergen matrices assist additionally when delivering food that may contain traces to adjacent tables/guests
Buffet and canape allergen cards	<ul style="list-style-type: none"> • Where buffets are provided allergen cards should include photos of the foods to ensure that guest are greater advised of contents • Buffets should seek to have products with allergens placed below dishes without allergens • Buffets should have allergen containing products stored in a linier manner and with a physical separation • Dishes and foods without allergens should be placed at alternate ends of display with physical barriers or distance and be clearly signposted as no allergens • Staff undertaking canape service carry a photographic allergen card of the canapes on that particular tray • Staff should rely only on the photographic allergen's cards for allergen information over memory • Trays should only be replenished with like for like canapes

Table mapping/exclusions	<ul style="list-style-type: none"> • Where the guest has identified that they are unable to be seated near allergens due to trace exposure, exclude all known dishes from the table and inform supervisors and managers that separation is required • Where it has been identified that tables may contain foods that have the allergens, the new guest must be relocated where possible • New tables should be advised of a guest that has a severe allergy and that certain foods cannot be consumed in close proximity and should they wish to, the relocation to an alternative table can be arranged
Cutlery and tables settings	<ul style="list-style-type: none"> • Cutlery and tables on notification from guests should be reset, and where possible cleaned and sanitised • New cutlery should be given to all members of the table including new napkins that have not been in contact other napkins, where possible retain napkins in clean, sealed containers/storage areas away from foods • Side plates and the like should be reset and clean sanitised crockery replenished • Glassware should be reset
Food Ordering	<ul style="list-style-type: none"> • Server takes order via paper pad / tablet / other • Sever informs manager. • Manager takes over order or servers continues and verbally reconfirms with chef. • Order logged on til system using the allergen buttons to identify the dishes affected.

4 Delivery of food		Measures
		<ul style="list-style-type: none"> • Food is delivered by the person who took the order and is aware of individual's order and seating location • Server washes hands • Checks with chef as to dish order on pass. • Food is delivered to the guest with the allergen last/first to ensure greater controls and clearly identified as the allergen order • Managers to oversee final delivery of foods to guests • If take away foods or delivery foods, separate packaging and bagging with a clear indicator is used such as purple allergen coloured plastic bags/containers • If purchased online/via phone food is delivered with an allergen matrix within the packaging even where no allergen information has been given by guest • Products which are pre-packed for direct sale are provided with a label detailing the name of the food, a full list of ingredients in descending order, and allergens clearly highlighted in BOLD
Meal markers		<ul style="list-style-type: none"> • At point of services plates that are to be allergen free are clearly marked with an identifier • At point of service plates are segregated from other foods • Where allergen have been identified on a table, ensure that glasses are marked to ensure that drinks that may contain allergen are not accidentally topped up incorrectly
5 Website & booking systems		Measures
Website has clear information of known allergens		<ul style="list-style-type: none"> • Guests are advised on ordering on website via pop-up or similar for each dish • Guests are notified on completion of order of allergen containing dishes

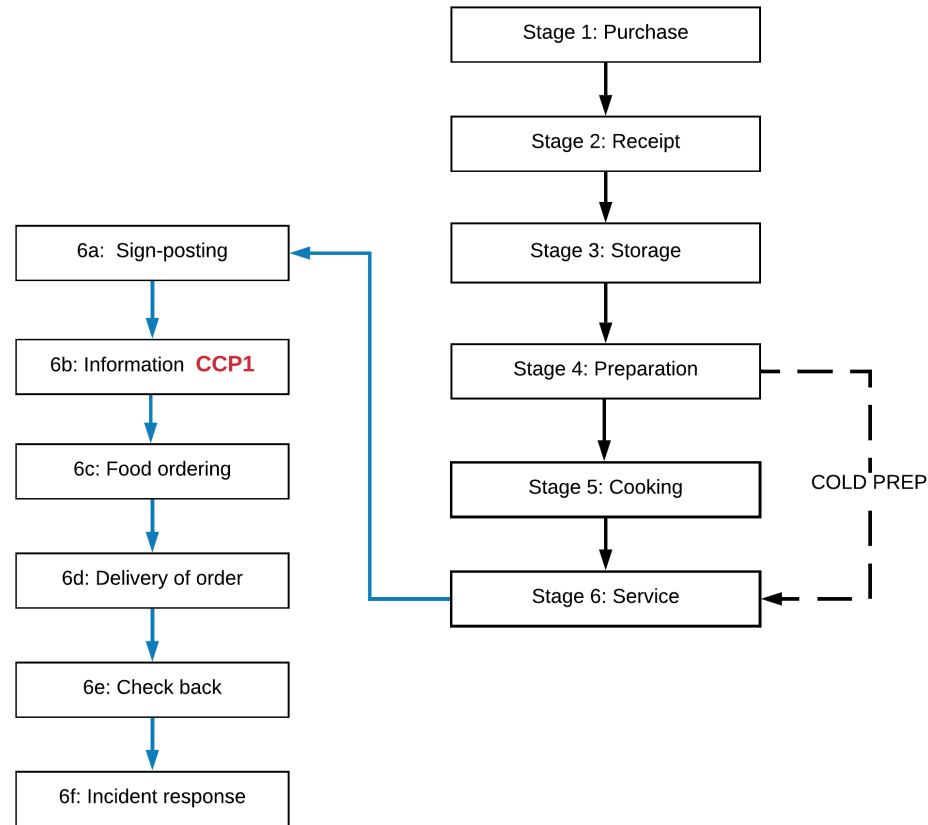
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Online ordering	<ul style="list-style-type: none"> • Allergens are shown when mouse click or hover on dishes is detected • Allergen information is sought from guest on ordering to proceed either identifying allergies or intolerances to purchase • Website prevents ordering where pop-up blockers are used • Pop ups or similar are used when finalising orders identifying allergens in final order • Allergen warning should only be used where controls are unable to be achieved in dishes not as a disclaimer
Online booking	<ul style="list-style-type: none"> • Booking system requests allergen information for guest(s) prior to finalising booking • Booking system sends notification email with allergens matrix included to email or mobile number recipient • Where allergen information is verified, booking system restricts booking from peak periods to reduce risk of contamination • Online booking system to advise senior staff on confirmation of intent to book • Senior to confirm booking only after review of booking
In person or over the telephone bookings	<ul style="list-style-type: none"> • Staff seek verification of intolerance or allergies over the phone for all guests not just caller • Where verification of intolerance or allergies are identified, then staff are to seek contact details to be able to send allergens matrix • Bookings should be restricted from peak periods • Kitchen should be notified in advance as well as allergen ambassadors of guest(s) with allergies • Allocated seating is undertaken and kitchen and allergen ambassadors are made aware in advance

6	Allergen presence testing / kits.	Measures
	Significantly enhanced precaution	<ul style="list-style-type: none"> • The use of allergen lateral flow strips to determine if the areas have been correctly cleaned of all allergens prior to production and plating of foods within the kitchen and delivery. • This surface swab testing process is similar to that of surface swabbing and focusing in the service and production equipment for the making of allergens and will detect trace amounts within minutes. • This is a significantly enhanced process and is not always practicable in many kitchens but in small tight kitchens and serveries it may be of use to ensure that the areas have been appropriately cleaned and sanitised.
7	Additional Training	Measures
		<ul style="list-style-type: none"> • All staff who handle foods or undertake guest front facing experience are required to complete allergen training in person avoiding online courses • Online courses undertaken by all front facing staff have secondary verification methods of completion and testing • Staff to undertake allergen training prior to starting work • Staff are regularly retrained for allergens • Staff are internally tested for allergens knowledge and delivery

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3.0: Site Specific HACCP: 3.1 Allergen Flow chart



NB: Assessment of CCPs in this area is hampered by the lack of ability to readily & accurately monitor critical limits, provision of information to the customer does fall within the accepted definition.

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3.2:Catering Services Control Table for ALLERGENS: *Please note the controls below are dependent on the information given to customers and must match.*

Stage No	Hazards	Controls	CCP	Monitoring			
				Procedure	Frequency	Critical limit	Corrective actions
1	Purchase Contamination of food with allergens during manufacture / packaging	Use of approved suppliers Who comply with consumer information regulations and can show appropriate control of processes and can provide accurate information about the constituents of the foods. Agreed specification of supplied products and process for substitutions.	No	Supplier approval procedure followed	All suppliers Review every annually or based on returns /complaints	No deviation from agreed specifications Supplier must supply satisfactory documentation Pack labels must be clear.	Change supplier if necessary Return food
2	Intake/ Receipt Cross contamination during transport Pre-packed goods not clearly labelled.	Foods to be appropriately packaged and separated. Pack labels present and readable	No	Delivery checks	Each delivery	Allergen foods packaged and not in direct contact with other foods. Pack/carton labels intact and identifiable	Suspect contaminated foods quarantined and labelled as allergenic for use in allergen final products If above not possible – reject delivery Retail pre-packaged goods that are not clearly labelled to be rejected. Inform supplier

Stage No	Hazards	Controls	CCP Monitoring				
			Procedure	Frequency	Critical limit	Corrective actions	
3	Storage	<p>Cross contamination of between allergen and non-allergen foods during stowage and storage.</p> <p>Foods in general to be covered (unless in frequent use)</p> <p>Allergens foods in frequent use to be stored in deep sided containers with food level below the lip of the tub (garnishes, bar ingredients)</p> <p>Allergen ingredients not mixed with other foods in the same containers (e.g. celery/celeriac with other veg).</p> <p>Gluten free foods stored above gluten containing foods or on separate shelving stacks.</p> <p>Gluten free foods kept in packaging until use (pre-packed goods).</p> <p>Allergenic foods stored under allergen free product or on separate shelves (if possible) e.g. milk / eggs.</p>	No	Visual checks	<p>Twice a day: open & close checks</p> <p>Casually through the day by all staff</p>	Incompatible foods not mixed.	<p>If possible, remove contamination by washing or removal of outer layout of food</p> <p>Quarantine food for use in allergen dishes only</p> <p>If above not possible discard food or update information provided to customers.</p>

Stage No	Hazards	Controls	CCP Monitoring				
			Procedure	Frequency	Critical limit	Corrective actions	
4	Allergen cross contamination during handling/preparation	<p>Dust producing preparations to be done separated in time from other processes (e.g. bread making with gluten-based flour)</p> <p>Clean equipment and utensils to be used between the preparation of each product type</p> <p>Hands washed and apron changed (or disposable apron used) between preparation of each type of product</p> <p>Chefs must follow recipe sheet / specification. If any changes have to be made this must be notified to the Head Chef / GM first.</p> <p>Non-allergenic dishes made to order must be:</p> <ul style="list-style-type: none"> - Made in designated area - Area cleaned down before start using 2 stage cleaning - Chef to wash hands and change apron or wear disposable apron - All equipment / boards / utensils must be pre-cleaned (using dishwasher) - Served straightaway 	No	Observation	Each dish	<p>No obvious errors / signs of cross contamination</p> <p>Recipes must be accurate, understood and followed</p>	<p>Discard suspect foods</p> <p>Amend information given to customers if recipe changes are made – DO NOT SERVE FOODS PRIOR TO AMENDMENT</p>

Stage No	Hazards	Controls	CCP Monitoring					
			Procedure	Frequency	Critical limit	Corrective actions		
5	Cooking	Allergen cross contamination during cooking	Crockery / equipment cleaned between preparation of products Fryers separated for product types (if possible) (labelling/signage?) Allergen free elements (for an allergen order) to be cooked in separate equipment: e.g. pan frying (if not separating fryers), sleeves for toasters Colour coded utensils to be used	No	Observation	Throughout service	Signs of cross contamination or prohibited food mixing	Discard food or update information to customers Empty and clean equipment using 2 stage cleaning
6	Service	Failure to identify customers with allergies / intolerances	Staff to ask customers on arrival Server checks customer needs, on introduction at table	No	Observation	Every customer	Every customer questioned	Staff to re-check when taking food order
6a	Sign-posting	Customers fail to enquire about content of foods due to lack of clear information	Menu states: Chalk board states: Verbal check by staff see above	No	Observation Management checks	Monthly audit Weekly Management checks	Information present and clear	Amend information

Stage No	Hazards	Controls	CCP	Monitoring			
			Procedure	Frequency	Critical limit	Corrective actions	
6b	Information Incorrect allergen profile of the foods provided causing the customer to make the wrong choice and potential injury.	Sign-posting and customer discussions with staff / manager. Regular checks on the accuracy of the allergen "matrix" (information shown / given to customer) Staff follow order of service (6c-e)	Yes CCP 1	Check all information points and matching of recipe specifications against the matrix. Check pack labels if necessary	Every batch on site checked Monthly audit Change of menu Change of supplier Supplier product substitution Daily specials	Food grade packaging used Information on recipe sheets /pack labels must match the matrix	Return any incorrect packaging Amend incorrect information Stop serving dish with suspected error (until error remedied)
6b	Information (PPDS) Incorrect allergen profile of the foods provided causing the customer to make the wrong choice and potential injury.	Products which are pre-packed for direct sale are provided with a label containing the name of the product, a full list of ingredients in descending order, and allergens clearly highlighted in BOLD . Changes to ingredients/allergens in PPDS foods are communicated to the team to ensure the labels are updated to contain the correct information Staff are provided training in labelling procedures	Yes CCP 1	Staff undertake label checks to ensure that the correct label has been applied to the product	Each product/batch	Information on the product labels must be correct PPSD foods must be provided with the correct label	Remove PPDS products incorrectly labelled from sale Re-label products Amend the incorrect information

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Stage No	Hazards	Controls	CCP Monitoring					
			Procedure	Frequency	Critical limit	Corrective actions		
6c	Food Ordering	Wrong dish ordered due to incomplete or incorrect interaction with customer	Staff clearly take order and check accuracy. Staff re-check dietary requirements with customers Read back full order to table re-stating the allergen/dietary requirement. Food order recorded on till highlighting the dietary requirement – use the standard allergen buttons or use “notes” for non-standard requests	No	Observation	Each order	Staff clear about what has been ordered	Return to table to re-iterate order.
6d	Food delivery	Cross contamination during handing of dish to table Foods not being given to the right customer (especially if two like dishes have been prepared with and without allergens)	Service staff wash hands or use disposable napkin for plate handling Dish is separated on pass from other dishes or passed directly to service staff Visual check of dish for obvious signs of food cross contamination Service staff re-check with Chef status of dish Server takes non-allergenic dish on its own to table and confirms with customer	No	Observation	Each service	No visual signs of food mixing Procedure carried out	Food not served and re-prepared If any mistakes suspected, return to table and remove food

Stage No	Hazards	Controls	CCP Monitoring				
			Procedure	Frequency	Critical limit	Corrective actions	
6e	Check back Failure to pick up an incident early enough	Server / Manager check back with table Shortly after food delivery server / manager to check with table and verbally check that customers are OK/happy	No	Management observation	Each order	Check back confirmed with manager Check back confirmed on till	Staff re-trained (No further CAs as an incident likely to be apparent or not)
6f	Incident response Allergic response of customer to food Illness (time delayed) due to intolerance to foods served	Staff trained in first aid Call 999 and ensure call handler clear it is an allergic reaction Supply first aid and support until paramedics arrive Administer customer's own epi-pen if possible none	No	Management observation	Each incident	Procedure must be followed	Full investigation carried to identify causes / breaks in the control chain Applies to both onsite incidents and post visit complaints This will include external support from Food Alert Ltd.

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