

FOOD SAFETY REQUIREMENTS

Food Premises (Registration) Regulations 1991

All food businesses which trade in the street for more than 5 days in a 5 week period are required to register with the Local Authority where the business operates or in the case of a mobile vehicle the Local Authority where the vehicle is kept. Registration must take place at least 28 days before the business starts trading. Registration is free and simply informs the Council that a business will be starting up. It does not mean that the Council has approved the business as complying with the law nor does it give the business any special rights to trade.

Food Safety Act 1990

The Food Safety Act requires that the food you handle and sell is safe for consumption. The detailed requirements which you must meet to ensure that food is safe are laid out in the Food Safety (General Food Hygiene) Regulations 1995 and the Food Safety (Temperature Control) Regulations 1995. The following information gives a summary of the key requirements of these regulations.

Hazard Analysis

In addition to complying with the detailed food safety requirements which are laid out in the regulations the proprietor of a food business must carry out what is known as a hazard analysis of the food operation.

The proprietor must therefore:

- Ensure that all food is sold in a hygienic manner;
- Identify food safety hazards;
- Understand which steps in your operation are critical for food safety;
- Make sure that safety controls are in place at these points and that they are maintained and reviewed.

A hazard is anything which may cause harm to customers through illness and/or injury. This includes the potential to cause food poisoning, the presence in food of foreign material, such as glass or metal, and chemical contamination.

The controls for these hazards do not have to be complex and there are a number of systems that can be used by food businesses to ensure that hazards are identified and ways found to control the risk.

This approach will mean that food hygiene can be planned for in easy steps, giving a clear understanding of the controls that are important to your business. Many of the controls may be common sense practices that have been followed for years.

Having identified the hazards and the points at which they are present a proprietor must decide whether they must be controlled to ensure that the food sold is safe or whether the hazard will be controlled by a later step in the process.

Examples of typical hazards in a food operation are:-

- Growth of bacteria and the production of toxins
- Bacterial contamination of ready to eat foods by raw foods or by food handlers
- Contamination of foods with foreign bodies e.g. pieces of packaging, drawing pins, paper clips, hair, etc.
- Food poisoning bacteria surviving cooking or re-heating

The proprietor must decide what they need to do to control the hazards at the critical points and what they need to do to monitor the control measures to ensure that they are working correctly.

Worked example

Step	Hazard	Control	Monitoring
Storage of salad	Growth of bacteria	Keep refrigerated below 5°C	Take fridge temperature before start of trading and half way through. If temperature is over 8°C adjust fridge setting and repeat check after 30 minutes. If still too high dispose of stock and contact engineer.

Finally, there is a need to review the hazard analysis on a regular basis to make sure that all hazards have been identified, that controls are effective and that monitoring is capable of making sure that the controls are still working.

A hazard analysis should be recorded in writing and submitted as part of the consent application.

Training

Everyone engaged in the handling of food must be suitably trained so that they know how to deal with food safely. For persons handling open high risk food (e.g. food which will support the growth of food poisoning bacteria) the minimum level of training that will be acceptable under the street consent scheme, will be successful completion of a 'Level 1' food hygiene course, including the exam, within the last 5 years.

Suitable food hygiene courses are accredited and run by several organisations. These include:

- The Chartered Institute of Environmental Health

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

Evidence of suitable training should be submitted with any application form.

Water Supply

An adequate supply of water is essential to food safety whether the water is to be used for the preparation of food and drinks or for washing and cleaning purposes. In most instances the vehicle will not be connected to a mains water supply. The proprietor must ensure that plenty of clean and wholesome water is always available at the food stall or vehicle. He/she must be able to demonstrate that the water containers are adequate in size and number for the activities carried out and that they are cleaned both inside and out on a regular basis. A chlorine based sterilant, for example Milton, should be used. The proprietor must be able to demonstrate that they can carry, or have access to, sufficient water to enable them to carry out all of their functions during the hours they are open and trading.

Hand Washing Facilities

All food businesses handling open food will need to provide adequate hand washing facilities so that food handlers can ensure that their hands are free from contamination. The wash hand basin should only be used for washing hands and should always be provided with:-

- adequate supplies of hot and cold water via taps over the basin.
- soap, preferably liquid soap from a fixed dispenser. Soaps should not be strongly perfumed to avoid tainting the food. For additional protection a bactericidal soap is recommended.
- an effective and hygienic way of hand drying. Disposable paper towels are the preferred option. Individual cotton towels are not acceptable. If they become contaminated then they will re-contaminate the hands of anyone who uses them subsequently.
- a sign stating that the basin is ONLY to be used for hand washing.

Just providing a plastic bowl or bowls for hand washing will not be sufficient to meet this requirement under the scheme. A wash hand basin IS required.

Sinks and Washing Facilities

Food proprietors must have adequate facilities for washing up and cleaning utensils and equipment. This means that they will need a proper sink which is big enough to accommodate the largest item that they will wash during catering activity and sufficient hot water. Washing up bowls alone are not sufficient. Draining board facilities should be provided where necessary but these should not be made of bare wood. If it is intended to wash up at

another location it will need to be demonstrated that suitable and sufficient facilities are available there.

If it is intended to wash and prepare food on the stall or vehicle then separate food preparation sinks will be needed in addition to washing up sinks. If this is not practicable large clean plastic bowls may be used for vegetable washing only. These must be kept clean.

Plenty of clean hot water must always be available for washing up and cleaning surfaces. Sufficiently large hot water heaters or boilers must be provided for this purpose and sited so that they are level and stable. Hot water should be available prior to the commencement of trading.

Food Storage and Refrigeration

Poor temperature control and cross contamination of bacteria from raw to ready to eat foods are the most common causes of food poisoning. To comply with the temperature control regulations food proprietors must have enough refrigeration to ensure that all high risk foods are stored at temperatures below 8°C (preferably below 5°C). All stalls must therefore have a refrigerator. Proprietors must not use freezer units as refrigerators by turning them on and off. If a freezer is required on a stall or vehicle it should be capable of keeping food below -12°C.

Ensuring correct food temperatures at the critical steps in the operation are vital controls. Food temperatures, both during storage and cooking/reheating must therefore be monitored regularly using an accurate and reliable thermometer. The legal requirements relate to the food temperature and proprietors must therefore have a probe thermometer so that they can monitor this as necessary. A record of the temperatures monitored should be kept in a log book to demonstrate that the correct controls are in place and that they are working as required. A record also enables problems to be spotted before they become serious so that action can be taken to ensure food safety and prevent stock loss. If food is stored in fridges or freezers at the proprietor's home or other address these must also comply with the above requirements. These refrigerators and freezers may also be inspected at any time (even at domestic premises).

Protection from Contamination

All open foods in storage or on display must be kept covered or protected with screens to minimise the contamination risks. Food awaiting cooking must also be covered wherever possible to discourage flies and wasps which would contaminate the food or carry contamination onto ready to eat products. Raw and cooked food must be kept apart at all times and separate utensils such as chopping boards, knives, etc. used for each.

Food handlers must wear appropriate clean overclothing including a hat or hair covering to prevent food being contaminated. Protective clothing should cover the arms and body. All external clothing should be covered. In cold

weather, outdoor wear should not be worn over clean protective clothing. T-shirts, uniforms etc. used solely for the food business are acceptable.

Staff who handle or prepare open high risk food should not travel to work in their protective clothing. They should remove their protective clothing if they leave the vehicle.

Design and Construction

The stall or vehicle must be large enough for the type of operation carried on. There should be sufficient working surfaces for the separate preparation of raw and cooked products so that cross contamination cannot occur. It should also be of sufficient size to enable the number of employees intended to operate the stall to move around without any health and safety hazards.

The vehicle or stall should be designed to avoid the risk of harbouring pests.

All internal surfaces must be in a sound condition and be easy to clean and disinfect. Stainless steel or plastic laminate cladding for walls and cupboards would be acceptable. It is recommended that all work surfaces be of stainless steel.

Cleaning

It is a legal requirement that food premises are kept clean. Stalls and vehicles used for street trading tend to have very limited space. Effective and regular cleaning is therefore an even more important control to prevent contamination than in a normal kitchen.

For cleaning to be efficient it must be managed, checked where necessary and done to a set routine. The following points may help in setting up an effective cleaning system:-

Select appropriate chemicals and cleaning techniques for the tasks required.

'Clean as you go' is the best policy. It prevents dirt and debris from building up which make cleaning easier and it helps to ensure that when anyone wants to use a utensil or piece of equipment or work surface then it is ready to use. If staff are employed, they should also 'clean as they go' particularly after using utensils, work tops, chopping boards, etc. and especially before handling ready to eat products after raw.

Time should be set aside in the day when cleaning can be performed and proprietors should decide how much time should be devoted to cleaning.

Cleaning should be separated into daily, weekly and less frequent tasks.

Daily tasks should include all working surfaces, floors, sinks, wash basins, draining boards, handles and items of equipment used during the day.

Weekly tasks might include walls, doors, windows, ovens, refrigerators, storage units, etc.

Less frequent tasks – clean items or areas not covered by the daily or weekly cleaning such as ceilings, ventilation units, upper wall surfaces, etc. In addition, although floors and items of cooking equipment receive daily cleaning, they occasionally need an extra in-depth clean and this should be incorporated into your cleaning routine.

Depending on the number of staff working in the business and the level of supervision it may be appropriate to produce a written cleaning schedule. This should allocate responsibilities and bear in mind how much time each person can devote to cleaning and when it will be done. Each individual should be given specific daily and weekly tasks based on the following principles.

Prepare a chart or rota, detailing each individual's cleaning duties, the time to be spent on them and when to do them. This needs to be linked to what cleaning product and cleaning method is to be used.

Ensure that staff know what their duties are and the standards expected.

Supervision is essential to keep up standards. If staff are aware that regular hygiene checks will be made then they are more likely to do the job properly.

If an area is found to be dirty then an effective rota will show when it should have been cleaned and who was given that task.

Cleaning should be a habit. A set routine will make this easier.

Personal Hygiene

It is good practice for the proprietor to instruct all staff on appointment that they have a legal duty to notify their manager or supervisor, as soon as possible, if they ever suffer from, or are likely to have become a carrier of a disease which might be transmitted through food.

In addition staff should be made aware of the staff sickness policy with regard to medical conditions which are likely to affect food safety. It is recommended that new staff are given this information in writing.

Each food proprietor will be expected to provide a written statement setting out their sickness policy for the exclusion of a food handler suffering from diarrhoea, sickness, sore throat, infected wounds, etc. and when they will be allowed to return to work.

Sanitary Accommodation

Suitable and sufficient sanitary accommodation must be available for use by the food handlers. This may be:-

- i) provided on the vehicle, in which case it must be completely separated from and must not open directly on to the food preparation or storage areas;
- ii) provided adjacent to the vehicle e.g. a purpose designed unit or trailer;
- iii) suitable facilities nearby may be accepted. If you intend to use such sanitary accommodation, e.g. in a public house or restaurant, the sanitary accommodation must be available for use when the stall is trading, although the stall holder may continue to trade for up to one hour after the availability of the sanitary accommodation has ceased. Written permission to use such sanitary accommodation must be provided.

Whichever arrangements are made the sanitary accommodation must be kept in a clean and satisfactory condition and maintained in working order and be available for use at all appropriate times when that stall is in use. Where the accommodation is provided by the proprietor access may be restricted for the sole use of the proprietor or employees of the food business.

Waste Disposal

The consent holder must comply with the Environmental Protection Act 1990 (as amended) and dispose of waste lawfully.

Adequate arrangements and facilities for the hygienic storage and disposal of solid and liquid waste must be in place. This is a very important legal requirement because there is unlikely to be the same access to the kind of waste collection and disposal facilities which conventional premises take for granted.

As part of the application proprietors must be able to demonstrate that they have made suitable arrangements for the disposal of solid and liquid waste, including fats and oils.

This will normally be in the form of a "waste transfer note" from a registered waste disposal company.

Records showing the date and place of disposal must be kept for a minimum of 2 years and produced on demand to an authorised officer of the Council. (Environmental Protection Act, Section 34).

Refuse

No waste material must be deposited on the public highway or any adjacent property. All waste material must be subject to proper commercial waste disposal controls and therefore waste arising from the business must not be

disposed of in public litter bins or the domestic waste collection, or deposited at an amenities site.

In addition to the waste bin provided for use by the food handler there must be provided at least one refuse container placed on the pavement near to the stall or vehicle so that it is available for the use of customers. A clearly visible notice shall also be displayed requesting customers to deposit litter in a waste container.

The consent holder must ensure that the area in the vicinity of the vehicle or stall is kept clear at all times of all refuse originating from the trading activities and from customers. In particular the site must be left clear of such refuse at the completion of trading.

Drainage

The majority of vehicles and stalls will not be connected to a drain. The proprietor of the stall must, therefore, be able to demonstrate that a waste water point is available or that sufficient capacity is available to contain and store all waste water generated during the catering activities. Under no circumstances must containers used to transport and/or store drinking water also be used to store waste water.

Trading Standards

All licensed traders operating a food business must clearly display the prices of the food they are selling.