

# **21<sup>of</sup> Secrets** **Successful Food** **Safety Management**



**£7.95**

**By Steve Pepper** FRSPH, MIOH

**Forward by: Mick Triffitt**



Steve has aimed this book at helping people who are just starting out in the food business or at people who really want to know how they can improve the standards of food safety.

The contents of this book will help them improve on, and/or keep their existing **Food Hygiene Rating** under the Food Hygiene Rating System (FHRS).

It is not a lengthy tome or a difficult to understand, technical reference book but rather something you can dip into and get some helpful and practical, common sense, help, advice and tips.

I like the way he starts by telling you to develop a good working relationship with your local Environmental Health staff team, as you are more likely to get help and support than if you adopt a confrontational approach.

Steve has been working in and with the food industry for many years and his knowledge and experience and passion for his subject are obvious from the content of this book.

It's an easy read and I would recommend that you work your way through it and put some of these 21 "Secrets" into place in your food business.

If you do you will not only make the food you prepare safer for your customers but also help you to get and maintain a better rating that you can proudly display on the front door.



Mick Triffitt

Chair  
Harrogate and District Food Safety Forum.



## Preface:

This is the second in what hopefully will be a range of books that are intended as practical advice for the manager or business owner.

This is not a **“theory”** or a lengthy **“reference”** book but a practical guide to what you need to do to keep your customers safe and keep you on the right side of the law.

It is not intended to replace training but as an aid to understand what your duties and responsibilities are.

When I was a trainee chef in the early 70s I asked my college tutor why he was teaching us five star catering principles when most of us were working at simple seaside restaurants with limited menus. He told me simply “If I only teach you 3 star catering then you wouldn’t know what to do if you got a job in a five star restaurant”. Point taken.

I take the same tone in this book. If you follow all the practical advice that I give then you can achieve a good Food Hygiene Rating.

Enjoy the read and start putting some of these **21 “Secrets”** into practice.

**Steve Pepper**



**“Fresh and healthy are not always synonymous with safe...”**

**STREET INSIDER**

For Mum

This edition published April 2013  
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## 1/How to win friends and influence people

It goes without saying that if you have poor standards of food hygiene then there will be consequences:

Prison, fines, death, poor staff morale, high turnover of staff, poor reputation, loss or closure of business, the list goes on.....

If you want to keep your local environmental health department, staff, customers, bank manager, directors or management board happy, then you need to have good standards of food hygiene.

In England, Wales and Northern Ireland we currently have a **“Food Hygiene Rating System” (FHRS)**, which grades the standards of Food Safety in food businesses, (manufacturing, catering, retail) on a zero to five rating with 5 being the highest. Scotland has a different version based on the same principles.

Other countries have similar systems and these usually use the internationally recognised “Codex” seven principles of HACCP standard as the basis for good food hygiene practice.

Food safety inspections in the England are currently based on the **April 2012 Code of Practice, Annex 5**. This is the guide used by your environmental health inspector to grade, score and convert this into your food hygiene rating.

Owners or managers of food businesses don't always consider how important a good rapport with their inspector is. They're simply doing the job of protecting the public and they generally would rather help a business to improve standards than close it down.

Get that relationship right and this will make the whole process a lot easier. Treat people with respect, accept any advice given, ask pertinent questions and your visits will be something to look forward to. In my experience enforcement bodies such as police, fire, and environmental health are much more likely to deal with you in a positive, open way if this is the case.

In addition the recent Pennington report has recommended that:

***“Recommendation 7 – Regulatory and enforcement bodies should keep the choice of “light touch” enforcement for individual food businesses under constant review.”***

He also goes on to say that **“confidence in management”** should be evidence based and that primary and secondary visits should be unannounced. In practical terms if you have a visit and your paperwork practices and environment/structure are all OK then you will probably have a **“light touch”** inspection. If they aren't then expect a more detailed assessment of your business.

It's worth noting that your food safety history and your professional relationship with enforcement bodies will inevitably influence such decisions.

**“Every man I meet is my superior in some way. In that, I learn from him.”**  
**Dale Carnegie**

## 2/First Impressions

If someone were to walk in the room you're in right now it would probably take you all of three seconds to make a judgement about them. Be that good, bad or indifferent. It's your subconscious that helps you do this and quite often your "gut instinct" will stand you in good stead. Similarly environmental health inspectors make the same judgement about the standards of food safety in your business. In all likelihood they will spend the rest of the inspection justifying their initial impressions.

Firstly they will probably ask to see your paperwork. If it's incomplete or the records indicate that it's been used as a "tick the box" exercise then this will influence their opinion on how well you are managing your food safety.

Once they get to view the part of your premises where food is being prepared, stored or served it will further influence whether you get a "**light touch**" inspection or the full works. The first thing an inspector will probably see is your hand washing facilities. An easy thing to set up but how many times do they see no soap, no towels, or the sink being used for something else or not being used at all!!!

One thing is that if you have to justify why you are doing something in a given way then this perhaps will start to ring alarm bells.

For example in the **Safer Food Better Business (SFBB) handbook** there is a section on cross contamination that invites you to say what sort of cloths you use and this lists tea towels etc. Even if these are **boil washed** at the end of each day it only takes seconds for these to be heavily contaminated with pathogenic (harmful) bacteria such as **Salmonella, Campylobacter or E. coli O157**, by someone using them to dry their hands or wipe down a food surface. A simple change to food grade paper towels/barrel wipes and single use cloths are much safer and create a much better "**first impression**".

Similarly oven cloths can't easily be substituted so make sure these receive at least a daily boil wash (rather than a low temperature one that won't kill bacteria). Also, have somewhere clean to hang these up rather than let staff simply put them on a food surface where they will be a "**vehicle of contamination**". Other simple items such as having a no wood or glass policy, having colour coded knives/chopping boards and good separation will all add to a good first impression.

Online training is often seen as inferior to accredited training with tutor in a classroom style session. One of the reasons for this is people don't get the chance to ask questions about their own workplace. Also, if someone gets the question wrong they can usually re-do it until they get it right. i.e. multiple guess that isn't tested in exam conditions.

If you opt for online training ensure that staff are adequately supervised as well. Simply by having a certificate or piece of paper on the wall is not an indication that staff have been trained "**commensurate**" with their duties (i.e. trained to do their job properly). By observing and questioning staff the inspector will get a clearer indication if their training is adequate.

Tidiness, lack of clutter and good deep cleaning especially behind fixed equipment will also influence the inspection results. It's no good trying to say that you've been busy and haven't had time to clean up that day when there is three months worth of dirt and grease build up.

**"You never get a second chance to make a first impression."**  
**Accredited to Oscar Wilde**

### 3/The Law

Food safety law has been in place in the UK for a long time. The last major update was in 2006. Rather than try and tell you about some of the specific or more obscure sections of the legislation such as food labelling requirements. I will just outline the main principles of food safety law. Like all legislation it is constantly under review so by the time you read this it is quite possible that subsequent changes may have taken place.

#### The Food Standards Agency

This is the main UK body associated with food safety legislation. Among other things it has produced an online form so food and feed businesses can notify if they need to withdraw products from the market. They have also come up with “**Food Handlers Fitness For Work**” for dealing with people that need to be excluded from food handling due to illness. You can also download the full “**Safer Food Better Business**” (SFBB) and other relevant documents from their website <http://www.food.gov.uk> these are all available free of charge.

#### The Food Law Code of Practice (and the equivalent Feed Law code)

This sets out the way local authorities should inspect food premises and apply the law and work with food businesses.

#### Food Safety Act 1990

This is the main act of parliament concerning food and underpins all other food hygiene legislation. All other food safety legislation regulation and codes of practice comes under this i.e. Food Hygiene (England) Regulations 2006

#### 852/2004 regulations.

One of the things this relates to is food hygiene training. There is no specific mention of or requirement for any form of specific training. The regulations state that training should be “**commensurate**” with the duties of food handlers. Remember, it’s not just about having a piece of paper that says you are qualified. If someone is not demonstrating good food hygiene practice in the workplace they can still have action taken against them by an environmental health inspector. In this case the training certificate is unlikely to offer any defence of “**Due Diligence**”. Due Diligence is a legal defence where you may be able to prove that you took all reasonable steps to maintain food safety. In practice “Due Diligence” records would be things like training records, temperature and cleaning records etc., which would all be dated and signed.

#### Food Hygiene (England) Regulations 2006

This outlines the need to register your food premises 28 days before you open. NB registration is free. Food businesses also need to have controls, procedures and records in place that follow the principles of **HACCP (Hazard Analysis Critical Control Points)**. For most small caterers and retailers the Safer Food Business Pack is available free of charge from the Food Standards Agency Website <http://food.gov.uk/business-industry/caterers/sfbb/#.UV2hpKVOTdk> .

More detailed Butchers and Enhanced SFBB packs are available from SFBB Systems Ltd. These are tailored to an individual business and are chargeable. NB there are similar but separate Regulations for other parts of the UK.

For more information on all of these go to this website [www.food.gov.uk](http://www.food.gov.uk)

**If you have ten thousand regulations you destroy all respect for the law.**  
**Winston Churchill**

#### **4/HACCP (Hazard Analysis & Critical Control Points)**

**A food safety management system, built on the principles of HACCP, which is significant for food safety.**

HACCP was first introduced by the North American Space Agency in the late 1950s. They'd already noted the importance of keeping astronauts free from diarrhoea and vomiting in a spacesuit or spacecraft. Pillsbury then went on to publish HACCP in the early 1970s when it was then adopted initially by food manufacturers and later on by restaurant and hotel chains, hospitals, schools, care sector, airlines and other large producers of food. Full blown HACCP is probably an overkill for most small caterers and retailers and the Food Standards Agency (FSA) have produced a simple, free, alternative called Safer Food Better Business, which we will look at in the next section. You could also engage the services of a food safety professional to help you write your own system built on the principles of HACCP. To successfully implement HACCP there are certain standards or pre requisites that you have to have in place:

#### **Pre-requisites**

*pre-requisites are requirements that must be in place regardless of the nature of the food operation i.e. Approved suppliers, good design/suitable facilities, equipment calibration, preventive maintenance, personal hygiene/competency, stock rotation, cleaning and disinfection, pest management, good housekeeping, waste management, labelling and traceability, contingency plans.*

Hazard Analysis should be conducted using the seven principles of HACCP:

#### **7 HACCP principles as defined as:**

- 1/Identify hazards
- 2/Identify the critical control points (CCPs)
- 3/Establish critical limits
- 4/Implement monitoring of CCPs
- 5/Establish corrective actions to be taken when a CCP is not under control
- 6/Establish verification procedures to confirm that the HACCP system is working effectively
- 7/Establish documentation concerning all procedures and records appropriate to these principles and their application and keep under review.

This outlines the way to implement HACCP if you have a larger operation such as food manufacturing, chain of hotels/restaurants/care homes, school meals or hospital etc.

#### **Codex implementation of HACCP – 12 logical steps.**

Prior to conducting the Hazard Analysis:

1. Assemble and train HACCP team (define terms of reference/scope of the study).
2. Describe the product/recipe/process
3. Identify intended use of the product
4. Construct a flow diagram
5. On-site validation of flow diagram
6. Identify hazards/risk/severity and control measures for each hazard (Principle 1).
7. Determine critical control points using the decision tree (Principle 2).
8. Establish critical limits for each Critical Control Point (Principle 3).
9. Establish a monitoring system for each CCP (Principle 4).
10. Establish corrective actions to be taken when a CCP is out of control (Principle 5).
11. Establish verification procedures (Principle 6).
12. Establish documentation and record keeping (Principle 7)

**"The system is known as HACCP — Hazard Analysis and Critical Control Point, or, as critics call it, Have Another Cup of Coffee and Pray  
Wayne Roberts.**

## 5/Safer Food Better Business

The Safer Food Better Business Pack was brought out by the Food Standards Agency to help small catering and retail businesses manage their requirements to have a HACCP based system of managing food safety and have written records. There are separate versions for England/Wales, Scotland and Northern Ireland. The system is based on good industry practice and craft skills but nowhere in the English version does it mention HACCP.

SFBB is also available for Chinese, Indian, Pakistani, Bangladeshi, and SriLankan cuisines. There is a supplement for care homes and there is a special cut down version for child minders. The Scottish and Northern Ireland versions are more advanced than the England and Wales Version. The Scottish version has HACCP style flow charts and looks and feels more like a formal HACCP system.

SFBB is available free of charge to food businesses either as a hard copy pack or as a pdf download from the FSA website To order a hard copy contact Food Standards Agency Publications on 0845 606 0667 or email [foodstandards@ecgroup.co.uk](mailto:foodstandards@ecgroup.co.uk) . The pack consists of a DVD with a managers' section and a 30-minute video to help with induction training for new and existing staff. This is in 16 different languages. After showing this to staff it's a good idea to record this and other training on the staff training record that comes with the pack. There are separate versions for retailers and caterers.

The Policy section of the book requires you to go through the pack and say how you are going to manage food safety in your book. For example in the first section on cross contamination it asks, **"Do you train your staff to wash their hands yes or no?"**. Clearly this is not rocket science and I don't know many people who would answer **"no"** to this question. If you do train your staff to wash their hands don't forget to put this on the staff training record in the SFBB pack.

The first 4 sections cover the 4 "C"s Cross Contamination, Cleaning, Chilling and Cooking.

The next section is the management section where you will find things like sample cleaning schedules, opening/closing checks (which you can add things to), extra checks, **"Prove it"** records, advice on training and supervision, suppliers checks and lists. Lastly comes the diary section. This should be completed daily and signed off against the opening and closing checks. Only record by exception: i.e. *things like refusing a delivery, fridges not working, stock out of code and what action you've taken*. At the four-week stage there is a review, so you can reflect what has happened and if you need to take further action such as changing a supplier or product, putting in a new "prove it" record etc.

Above all the SFBB pack should reflect what is happening within your business and it should be kept up to date. You can enhance this pack by putting in further controls of your own. For example when it describes the control of "having juices running clear in a joint of meat to make sure it's cooked", it would be better to use a clean, calibrated temperature probe that checks the correct core temperature has been achieved. You may also want to put in any additional information such as **"Fitness For Work"** declarations. All of these will help to enhance the pack and give your environmental health inspector the confidence about the way you manage food safety. In addition to the standard SFBB pack there is also an enhanced pack for butchers. This can be purchased from:

[www.SFBBsystems.co.uk](http://www.SFBBsystems.co.uk)

**What is food to one man is bitter poison to others.**  
**Titus Lucretius Carus**

If you have enjoyed the first five chapters of my book and you would like to upgrade to a hard copy just click on the website to order one Postage and Packing in the UK is included in the price there may be a small surcharge if your not in the UK just email me to check first.

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Steve

I hope you have enjoyed this book and hope that you find in it's pages some inspiration and tools to help you do your job as a responsible food safety person to the best of your ability.

## Notes

**Steve Pepper** has, over many years, been teaching food safety, which is his favourite subject. He currently has dual registration with both the Chartered Institute of Environmental Health and HighfieldABC awarding bodies.

He is one of only a handful of centres and individual trainers in the Yorkshire Region to be able to deliver Food Safety up to Level 4. He is also registered to deliver Level 2 HACCP and Level 3 Food Safety Auditing qualifications.

He has recently been registered to deliver the Level 3 and Level 4 Health and Safety in the workplace qualifications.

He is a graduate and member of the HCIMA (Now Institute of Hospitality), a graduate of the Chartered Institute of Personnel and Development. He is also a fellow of the Royal Society for Public Health

He has had over forty years experience in the food industry at Craft and managerial levels. He also has experience of working in the Catering, Manufacturing and Retail sectors.

In the last few years he decided that a change in work life balance was called for and he now runs his own successful training company that deliver's management and staff development training, social media training as well as accredited courses on fire safety, food safety and health & safety and customer service.



## Steve Pepper Training Associates

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## Acknowledgements



Many thanks again to Kath for doing a great design on the cover. And Matthew Parish for proof reading the book for me.



# the food safety system

*food safety made simple*

Matthew Parish is the Managing Director and founder of [TheFoodSafetySystem.com](http://TheFoodSafetySystem.com), an online service where members can design, build and maintain their own HACCP based food safety management system for their business.

Matthew has over 20 years practical experience dealing with all aspects of food safety, health & safety and trading standards within the food industry.

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## KATH WILKINSON

Director of FLAIR Creative, Kath pioneered The Lady Links Initiative mini-MAG in 2009 and is determined to build on all the positive feedback.

Early in her career Kath gained extensive experience as a graphic designer and studio manager for agencies in Yorkshire and the Midlands before establishing herself as a freelance designer in 2001.

Since then Kath has built a strong network of carefully selected industry professionals. Kath has a great capacity for innovative thinking, which extends beyond graphic design to product and service development.

Some of her other strengths are that she is pragmatic, pays close attention to detail, insists on high quality, and is totally committed to meeting and exceeding Client expectations.

She is passionate about corporate social responsibility and proactive in creating ways for organisations to “give back”.

FLAIR Creative, conveniently-based midway between Leeds and Harrogate, provides a full-range of cost-effective design, artwork and production services to a broad client-base drawn from commercial, public and independent sectors.

FLAIR Creative also designs and implements online marketing campaigns involving a mix of optimised and content-managed websites, e-shots, e-zines and media-support for business networking.

[www.flaircreative.com](http://www.flaircreative.com)  
[www.ladylinks.co.uk](http://www.ladylinks.co.uk)



[www.steve-pepper.co.uk](http://www.steve-pepper.co.uk)

## Secrets

This is the second in a planned series of books. This series includes Successful Staff Management, Health & Safety and Fire Safety. For more details go to my website [www.steve-pepper.co.uk](http://www.steve-pepper.co.uk)

Every effort has been taken to ensure the topics covered in this book are accurate and up to date. We would however recommend that you seek advice from a suitably qualified food safety professional. This will help to ensure that any changes you make regarding your food business meets the standards required. Food safety regulations and good practice are subject to continuous change.

**£7.95**

### Also available in this series:

- **21 Secrets of Successful Staff Management**
- **Health & Safety**
- **Fire Safety**

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**Food Safety Management**