

# **NBBC FOOD SAFETY GUIDANCE NOTE ON** **TRAINING/INSTRUCTION/SUPERVISION OF FOOD HANDLERS**

## **SUMMARY**

This Guidance Note (GN) provides advice on the Food Safety (General Food Hygiene) Regulations 1995 Schedule 1, Chapter X requirements in relation to food handlers. It does not provide advice on the more specific training requirements which apply in licensed butchers shops. It is derived from advice published by LACORS in December 2001.

## **DETAILS**

Schedule 1 Chapter X of the Food Safety (General Food Hygiene) Regulations 1995 states:-

*"The proprietor of a food business shall ensure that food handlers engaged in the food business are supervised and instructed and/or trained in food hygiene matters commensurate with their work activities".*

## **INTERPRETATION OF "SUPERVISED AND INSTRUCTED AND/OR TRAINED"**

The balance between the amount of supervision and instruction and/or training required will need to be decided on a case-by-case basis. It will depend on a variety of factors including:

- whether the job concerned involves dealing with high-risk foods
- the complexity of the work
- the aptitude of employees
- whether the food handler has a supervisory role (e.g. where the proprietor or manager is also a food handler)
- what kind of decisions food handlers are expected to make
- whether the food handlers work alone or as a team
- whether any more specific advice is provided in an officially recognised industry guide

It should not be assumed that a formal training course of some description is necessarily better than on the job instruction and supervision. Indeed, there is some evidence to suggest that external formal training courses are not always effective in changing staff behaviour, compared to 'on the job instruction' and associated supervision.

## **Assessing Compliance**

When food safety officers inspect food businesses, they may assess compliance with legal requirements in a number of ways, including:

- Questioning the proprietor
- Referring to an officially recognised Industry Guide
- Linking non-compliance to a food safety problem
- Questioning food handlers

In practice, assessment of compliance is likely to be a *combination* of the above. Whatever method or methods are used, it should be noted that the adequacy of supervision, instruction and/or training can only be realistically assessed on an individual basis related to the specific job which a particular food handler does.

## **GUIDANCE FOR PROPRIETORS.**

You can assess how well you comply by asking yourself how you have ensured that food handlers in your business are supervised and instructed and/or trained in food hygiene matters commensurate with their work activities. Don't forget, if you are also a food handler, to ensure the adequacy of your own training! Questions that may help your assessment could include:

- What are your staffs' main responsibilities?
- How do you ensure that your staff prepare/handle food safely?
- Have the staff been on a recognised training course?
- What instruction do you give your staff in relation to food hygiene?
- How do you supervise your staff?
- Have food handlers with a supervisory/instruction role received training?
- When did you last review the training needs of yourself and staff?
- How do you review the effectiveness of training/supervision/instruction?

Your answers to the above questions might make reference to training courses referred to in an officially recognised Industry Guide, to other courses, in-house training, or instruction/supervision. Additional advice on some of these issues is provided as follows:

### **Referring to Officially Recognised Industry Guides** (if a relevant guide applies).

In many cases the training advice in a relevant Industry Guide will be straightforward and entirely appropriate. However, in assessing your compliance it should be noted that following a formal training course recommended in an Industry Guide may not be the **only** way to comply with the requirements of Chapter X - as you may be able to comply by providing instruction and appropriate supervision instead.

Where formal training is not provided as suggested in a relevant Industry Guide, it is suggested that supervision and instruction should be in accordance with the following principles:

- Food handlers responsible for supervision (who may or may not be the proprietor) should be trained, and where an Industry Guide is provided, the training should be at least equivalent to the level recommended in the guide.
- For food handlers who only deal with low risk or wrapped food and have no supervisory responsibilities, the minimum level of instruction should be the "Essentials of Food Hygiene" as outlined in the Catering Industry Guide (or other relevant guide if applicable). Supervision, however, must also be given to such staff to ensure they act in accordance with food hygiene instructions.
- The amount of supervision might be reduced as staff gain experience and are proved to be reliable.
- The food handler is not expected to take on a decision-making or supervisory role normally allocated to trained staff members as a result of absences during holidays, lunch breaks etc.
- The supervision arrangements should be reviewed regularly. If the food handler concerned cannot be supervised adequately on a permanent basis, they should undertake sufficient training as suggested in a relevant Industry Guide to allow work to continue without compromising food safety.

The following do not *necessarily* demonstrate non-compliance:

- That the food handler has not followed a training course with a particular syllabus recommended in an Industry Guide.
- That a training course has been followed where no exam is taken at the end and/or no certificate is provided.
- That a recognised training course recommended in an Industry Guide has been taken but the exam at the end has been failed, for example due to the candidate having literacy difficulties.
- Situations where the food handler is given little or no supervision, provided that training has been given which should have enable work to continue without compromising food safety.
- Situations where a proprietor provides only limited training or instruction and supervision on the basis of a particular food handler's *proven* knowledge and competence accumulated from previous relevant hygiene training work-based experience and personal study.

Compliance is not *necessarily* demonstrated because a particular food handler has passed a course recommended in an Industry Guide. This is because:

- The course might not have been relevant to the food handler's specific work activities.
- The food handler may not have understood part or parts of the course relevant to their work (even though they may have passed the exam at the end of the course).
- The food handler may have forgotten part or all of the course.

### **Linking non-compliance to a food safety problem.**

A Food Safety Officer, when considering any contravention of other parts of the Food Safety (General Food Hygiene) Regulations 1995 or the Food Safety Act requirements, may also look for any evidence of a link to any lack of supervision, instruction and/or training. Any such evidence would need to link the action of food handlers to food safety contraventions which are within their area of responsibility. This would include visual evidence of food handlers causing possible contamination, not washing hands or showing disregard for other personal hygiene matters. Microbiological sample evidence of unsatisfactory food produced, or evidence of a food poisoning outbreak caused by poor practices, may also be relevant.

Questions asked by Food Safety Officers are likely to focus on the implementation of the controls and monitoring procedures which are part of your hazard analysis system and which are relevant to the food handler's work activities. Whether or not a satisfactory hazard analysis system is in place, the food handler should be able to demonstrate sufficient understanding of why the controls and monitoring procedures at critical points relevant to their work activities are important.

Any questions used to assess compliance will vary considerably depending on the circumstances; however, in many cases questions would be likely to include such issues as cross contamination, temperature control, the importance of cooking parameters and proper stock rotation. In judging the responses, Food Safety Officers will take account of the level of supervision the food handler receives and whether s/he has received instruction or training.