

Food Safety Policy

If you need any information in a different format, for example large print, Braille, audio file or another language, please email Communications@housing21.org.uk

Version number	1.0
Issue date	October 2025
Review date	October 2028
Board approval required?	No
If yes, date approved by Board	N/A
Author's name and job title	Alicia Wheeler, National Health and Safety Manager
Policy owner and job title	Kris Peach, Chief Operations Officer
Reviewed by	Juliet King, Environmental Health Practitioner South Cambridgeshire Environmental Health
Policy Steering Group approval date	October 2025

Summary

Housing 21 is committed to providing food for our residents, employees and visitors which is safe to eat, nutritious and meets their quality expectation. Catering services comply with all relevant legal requirements for food safety within the parameters in which it operates. Food safety procedures have been developed, and we have adopted enhanced food safety procedures to reduce product risk and the associated threat of food borne illness which are based on industry best practice.

Housing 21 recognises that a successful food safety culture can be achieved only by following safe working practices developed through effective hazard analysis which provides full traceability of foodstuff, training and sharing of good practices.

Housing 21 has adopted the 'Safer Food, better business' Food Safety Management system and guidance to provide safety and quality standards and outline the responsibilities of the catering services regarding the provision of food across the organisation.

Regulations require that all food premises/businesses be registered with the local authority. A 'food business' is one which sells or supplies food and includes the preparation, treatment, storage and service. One application form is required to be completed (by the Housing/Housing & Care Manager) for each court that provides a catering service.

This food safety management system has been written by Housing 21 and South Cambridgeshire District Council Environmental Health as Primary Authority partner with Housing 21.

Equality, Diversity, and Inclusion

Housing 21 aspires to embed diversity and inclusion within all our organisational activities to enable these principles to become part of our everyday processes.

Food provision across the organisation embeds diversity and inclusion by recognising and actively accommodating a wide range of dietary needs, cultural traditions and individual preferences. This approach will ensure Housing 21 creates an environment where everyone feels valued and respected, fostering cultural awareness and ensuring equitable access to healthy, appropriate food.

Contents

Legislation and Regulations

1. Scope
 - 1.1 Legal and Regulatory Framework
 - 1.2 Aims and Objectives
 - 1.3 Environmental Health – Registering as a food business
 - 1.4 Food Quality Standards
 - 1.5 Food Allergens
 - 1.6 Monitoring and Inspection
 - 1.7 Key Performance Indicators (KPI's)
 - 1.8 Resident Engagement
 - 1.9 Complaints
2. Roles and responsibilities
3. Emergency procedures
4. Consultation
5. Associated guidance documents

Legislation and Regulations

The principle legislative and regulatory documents applicable to this policy

Health and Safety at Work etc. Act 1974

Management of Health & Safety at Work Regulations 1999 (as amended)

Food Safety Act 1990 (as amended) and subsequent regulations thereunder (including assimilated Regulation (EC) No 178/2002 General Food Law and assimilated Regulation (EC) No 852/2004 the hygiene of foodstuffs

Provision and Use of Work Equipment Regulations 1998 (PUWER)

Food Information Regulations 2014

Guidance

Safer Food, Better Business (SFBB) and any additional guidance advised by the FSA – Food Standards Agency

1. SCOPE

This policy applies to all food handling activities undertaken by (or on behalf of) Housing 21; this includes but is not limited to:

- In-house catering services operating on Extra Care schemes
- External catering services
- Community food events arranged by Housing 21, residents and visitors

All employees, residents and visitors are required to adhere to the hygiene and safety procedures outlined in this policy, including regular handwashing, proper food storage and temperature control.

1.1 Legal and Regulatory Framework

Health and Safety Legislation

Health and safety legislation applies to catering services, the Health & Safety at Work Act (HSWA), the Management of Health and Safety at Work (Amendment) Regulations 2006 which requires risk assessments to be carried out and the Provision and Use of Work Equipment Regulations 1998 (PUWER) set out responsibilities and specific requirements that are relevant to catering:

- Equipment must be suitable for the intended use, safe to use and maintained
- Equipment must only be used by those with adequate training
- Equipment provided with suitable safety measures e.g. protective devices, markings and warnings
- Regular, routine inspections are carried out if there is significant risk resulting from deterioration or in exceptional circumstances
- Results of inspections are recorded and kept until the next inspection has been recorded
- No work equipment obtained from the workplace of another person is used unless there is physical evidence that the last inspection has been carried out.

Food Legislation

The Food Safety Act 1990 (as amended) and subsequent regulations thereunder provides the framework for all food legislation in the England, Wales, and Scotland.

The main responsibilities for all food businesses under the Act and regulations are to ensure that:

- businesses do not include anything in food, remove anything from food or treat food in any way which means it would be damaging to the health of people eating it
- the food businesses serve, or sell is of the nature, substance, or quality which consumers would expect
- the food is labelled, advertised, and presented in a way that is not false or misleading

Food labelling is covered by legislation and required to give information to consumers to help them select, store, and use products safely. For food safety, the label needs to cover:

- Ingredients
- Allergy advice (the 14 most common allergens highlighted in bold) * Appx. i
- Dates (“use by” for perishable foods and “best before” for quality)
- Instructions for storing or using the product
- Product name
- Description
- Traceability

*The Food Information Regulations 2014 require information on 14 key allergens to be made available to consumers – any of the 14 allergens that are ingredients in a product must be identified on the label in bold. It is not acceptable to state “may contain ...”.

1.2 Aims and Objectives

The Policy sets out how we will support and manage food hygiene and provide guidance to employees, residents and visitors. The aim is to minimise the risk to employees, residents and visitors by managing food hygiene on our premises with the objective of ensuring that all food prepared and consumed is safe for consumption whether provided on a community basis or full catering service.

Community Food	Regular, ongoing provision of food e.g., weekly luncheon
Catering Service	A fully managed food service (in-house or contracted) delivering meals and beverages in line with our Food Safety Management System (FSMS), contractual standards and resident needs.

Ad-hoc events

Where food activity is very limited and infrequent 'ad-hoc' rather than as a regular business activity you may not need to be registered with the local authority environmental health*. However, the food should still be safe to eat and in line with the Food Standards Agency recommendations, food safety and hygiene best practices should be followed.

*Example:

If you're selling cakes occasionally you will not need to be registered with Environmental Health, however, you will need to comply with the regulations. However, if you're running a cake business, even a small one, you will need to comply with food hygiene rules and be registered with Environmental Health.

External Caterers: Objectives

- i. To provide a fully managed catering service, including attracting and retaining the best, trained professionals.
- ii. To deliver a quality Bistro style, or equivalent in etiquette of service and delivery manner, to residents.
- iii. To offer high quality fresh food and beverage choices.

- iv. To achieve the highest standards in food quality choices, to promote residents' well-being, food options and experience. This includes fresh food and beverages that are prepared, presented, and served to residents in an attractive manner, which offers customers a choice, with particular attention paid to appearance, taste, texture, portion sizes, temperature, and nutritional value.
- v. To enhance an excellent catering service reputation with customers, in view of expanding a catering offering to the surrounding community.
- vi. To create a welcoming and relaxed 'bistro ambience' environment producing food of the highest standards that not only attracts residents and their visitors but becomes a restaurant of choice.
- vii. To comply with all requirements and monitoring work as set out in the Safer Food Better Business for Caterers (Food Standards Agency): Safer food, better business for caterers | Food Standards Agency.

1.3 Environmental Health – Registering as a food business

If food is being provided on an ad-hoc occasional and small-scale basis e.g., cake sale, it is unlikely a scheme will need to register as a food business with their local Environmental Health. However, Managers are advised to contact their local Environmental Health Department to confirm.

If food is being provided for the 'community' on a regular and organised basis e.g., weekly luncheon, Registration with Environmental Health is usually required. It is recommended that the local authority's Environmental Health Department is contacted for specific advice on whether registration is required.

If registration is required, it is a free process, and the scheme should register with the local authority at least 28 days before food is to be sold. This can be completed online: www.gov.uk/guidance/food-business-registration

All catering services should be registered with environmental health and encouraged to display their food hygiene rating.

1.4 Food Quality Standards

All food provision whether community food or commercial will:

1. Provide good quality, safe, wholesome and nutritious meals, snacks and beverages in compliance with requirements of all food safety legislation.
2. Comply with standards as set out in [Safer food, better business \(SFBB\) | Food Standards Agency](#)
3. Follow the principles of Hazard Analysis Critical Control Points [Hazard Analysis and Critical Control Point \(HACCP\) | Food Standards Agency](#) and comply with all legislation, guidelines and recommendations as required.
4. Use of the HACCP principles will mean that there must be auditable systems, procedures and evidence to demonstrate due diligence for the following:
 - The sourcing, storage and preparation of all ingredients and food as necessary.
 - The supply of all equipment and consumables; and
 - Menu development, meal ordering and meeting any specific dietary needs.
5. Comply with all requirements and monitoring work as set out in the [Safer food, better business \(SFBB\) | Food Standards Agency](#).
6. Act ethically and with strong sustainable consideration to reduce waste and positively impact environments.

1.5 Food Allergens

If the food operation is not required to be registered as a food business, food allergen information still needs to be provided at all times, providing details of the relevant 14 allergens as best practice.

If the food operation does need to be registered as a food business, allergen rules must be complied with.

FSA training on food allergens should be completed by all catering staff and can be accessed [here](#).

1.6 Monitoring and Inspection

The Housing Manager/Local Housing Manager or the appointed Catering Provider are responsible for monitoring and inspecting catering provision by:

1. Undertaking regular environmental audits at each scheme including the kitchen and café surroundings to ensure that levels do not fall to a level that will impact meeting service KPIs.
2. Ensuring food preparation and delivery is kept in line with Safer Food Better Business for Caterers (Food Standards Agency): Safer food, better business for caterers | Food Standards Agency
3. Assessing the condition of equipment to ensure that no food hygiene risk is present such as chipped or cracked crockery. If faulty equipment is found it should be removed immediately.

Catering contractors are solely responsible for all exchange and monetary arrangements for the catering scheme financial arrangements but shall be required to comply with an open book arrangement to provide business transparency.

1.7 Key Performance Indicators (KPI's)

Catering Providers

The contract between Housing 21 and Catering Providers will set out Key Performance Indicators (KPI) that will be used to measure contract progress and success.

1.8 Resident Engagement

Catering Providers are expected to engage with residents at each individual scheme to support with menu planning, daily food options, meeting individual needs and ensuring fresh produce and ingredients are used.

Regular resident engagement sessions must be undertaken at a minimum of once a quarter.

1.10 Complaints

To complain about food safety issues in the first instance please follow Housing 21's Complaints Policy and Procedure.

2. ROLES AND RESPONSIBILITIES

Housing 21 is responsible for ensuring that catering services are managed by personnel with the appropriate qualifications and experience in all matters relating to catering, the provision of food for all needs, cost control and budget management.

2.1 Executive Management Team/Safety Forum

The Executive Management Team (EMT) will receive regular reports on the compliance with the policy and ensure performance is being achieved, together with notification of any non-compliance issues identified.

2.2 Chief Executive and Deputy Chief Executive

The Chief Executive retains the overall responsibility for the implementation of this policy.

The Deputy Chief Executive is responsible for ensuring that adequate resources are made available to enable the objectives of the policy to be met.

2.3 The National Health and Safety Manager

Is responsible for:

- Ensuring policies and procedures are written and remain up to date.
- Ensuring staff awareness and training in relation to food safety is provided within the organisation.
- Ensuring legislative changes and advice relating to changes are communicated to the Executive Team and ultimately the Board.

2.4 Heads of Service

Heads of Service have overall responsibility for the implementation and adherence to this policy and has responsibility for ensuring a monitoring programme is in place to guarantee the operational procedures are being implemented

2.5 Housing/Housing & Care Manager

Responsible for monitoring and inspecting the catering service to ensure it provides a high-quality catering service in line with this policy and that is safe and compliant with all standards and legislation including food safety and hygiene.

2.6 Local Housing Managers

Responsible for monitoring any community food operation and ensuring that if applicable, it is registered with the local authority Environmental Health and that the service is safe and compliant with all standards and legislation including food safety and hygiene.

Monitor ad-hoc catering to ensure compliance with food hygiene standards and determine whether ad-hoc catering events develop into community food operations.

2.7 Catering Providers - external

Are responsible for:

All external food caterers and their subcontractors engaged by Housing 21 must comply with all relevant food safety legislation, including but not limited to the Food Safety Act 1990 and related regulations. Caterers are required to operate in accordance with a documented food safety management system based on the Hazard Analysis and Critical Control Point (HACCP) principles.

Before any catering services commence, the caterer must provide proof of registration with their local Environmental Health department. They must also submit copies of relevant food hygiene and safety qualifications for all staff who will be handling food on-site in accordance with their assigned duties.

Housing 21 reserves the right to conduct audits of catering operations to ensure compliance with this policy.

2.8 Catering Manager (Housing 21 employee)

Responsible for ensuring Housing 21 meets its legal obligations and provides a service to a high standard that is resident focused – meeting food safety, nutritional needs and delivered cost effectively.

The Catering Manager has overall responsibility for managing and complying with the Safer Food Better Business caterers pack developed by the Food Standards Agency (FSA); to include

1. registering the food business with the Environmental Health Team
2. ensuring food served to customers is safe to eat
3. ensuring that staff are appropriately trained
4. maintaining staff rotas to provide a safe food service
5. completing food safety audits
6. overseeing the day-to-day food production operation to ensure that safe food is being produced
7. reporting any non-conformity which could compromise food safety to the Housing/Housing & Care Manager
8. ensuring there are adequate cleaning scheduled and resources to carry out all cleaning tasks required to keep food safe
9. ensuring that all food produced, distributed or delivered will comply to this policy
10. Managing catering staff rotas to ensure Housing 21 service provision requirements at each scheme can be met.

2.9 Training

Housing 21 will provide appropriate training to relevant employees to ensure they fulfil the management and compliance requirements related to their role.

- Chefs will be trained to the certified Intermediate Food Hygiene Level 3 (Level 3). Basic Food Hygiene Level 2 as an absolute minimum.
- All other staff must be trained to Basic Food Hygiene Level 2 or equivalent competence commensurate with tasks.
- New starters without such certification will be required to undertake and pass this level of qualification within three months of commencing their employment and always supervised with a colleague that has Level 2 or 3.

Community Food provision

It is not necessary to hold a food hygiene certificate to provide food for charity or community groups. However, a suitable level of knowledge to make sure that you handle food safely is required. Housing 21 recommends that anyone or one person in a group preparing community food be qualified to a Level 2 in Food Hygiene as a minimum.

2.10 Contractors

Catering Providers are responsible for carrying out required safety inspections, servicing, maintenance and repairs as determined by the Contract and in accordance with the Contractors Code of Conduct, which is agreed and signed at the commencement of the contract.

All Catering Providers will be DBS vetted. Due diligence checks will be undertaken to ensure contractors are Gas Safe registered, competent to undertake works with domestic, commercial, natural gas or LPG installations and equipment as appropriate and have an appropriate accreditation such as CHAS, Safe Contractor or equivalent that is recognised by Housing 21.

3. Emergency procedures

Typically, Housing 21 employees will be notified of a suspected case of food poisoning by:

- Complaints that people are unwell after purchasing food from or eating at the premises.
- Food handlers reporting that they are suffering from diarrhoea and/or vomiting.
- People attending an event begin to vomit whilst still on the premises

Any suspected outbreaks of food related illness thought to have started as a result of using our communal facilities should be reported immediately to the Head of Service and Health and Safety Team.

The Head of Service should inform the Environmental Health Department of the local authority and close the catering facility while any investigations are taking place.

Housing 21 requires all incidents to be reported using the incident reporting system ERICA, appropriately investigated and suitable remedial actions implemented to prevent recurrence. A food incident occurs when injury or illness is actually or suspected to be linked to food delivered to or supplied by Housing 21.

4. CONSULTATION

Housing 21's Health and Safety Forum and Policy Steering Group have been consulted about the development of this Policy.

Specific input of technical advice has been sought from Housing 21 employees with operational knowledge of gas safety management.

Housing 21's Primary Authority, South Cambridgeshire District Council, Environmental Health have been consulted on the development of this policy.

5. Associated documents and guidance

Housing 21: Food Safety Management System – based on Food Standards Agency ‘Safer Food, better business’ (SFBB)