

Food Safety Policy

PART 1 - GENERAL STATEMENT OF POLICY

- 1.1** Pabulum is fully committed to ensuring we provide food that is of good quality, fit for consumption and free from harmful contaminants.
- 1.2** We intend to consistently serve food that is prepared to the very highest standards using quality products and ingredients, complying with all relevant legal requirements, guidance and demonstrating industry good practice.
- 1.3** Systems based on the HACCP (Hazard Analysis Critical Control Point) principles are in place to ensure hygienic practices are operated in safe working environments, inspiring confidence in our standards. We also expect similarly high standards from our suppliers and contractors to support our delivery of exceptional food service.
- 1.4** Pabulum's food safety strategy is revised on an annual basis to ensure our approach to compliance remains effective, encompassing new legal requirements and guidance, contributing to wider Company priorities. Food safety performance against our standards is routinely monitored, valuing the contribution made by our employees and clients.
- 1.5** Pabulum actively promotes the health, safety, and welfare of all our employees and those affected by our work activities, including customers, visitors, and contractors.
- 1.6** We are committed to achieving a positive and evolving safety culture, recognising, and supporting the vital contribution made by our employees to make this a successful reality. We strive to continually improve health and safety performance across all areas of our business.

2.0 Our Food Safety Commitments

- Provide safe and hygienic work environments working together with our clients.
- Co-operate fully with all external authorities to demonstrate fulfilment of our legal duties, industry good practice and client requirements.
- Implementation of a food safety management system encompassing the principles of Hazard Analysis Critical Control Points and operating safe working practices to maintain healthy food safety behaviours.
- Detail and communicate food safety responsibilities.
- Provide an appropriate level of information, instruction training and supervision to enable employees to perform their role hygienically, protecting food safety.
- Consult and engage employees, clients, customers, contractors, and suppliers on matters relating to food safety.
- Ensure effective systems of traceability and recall within our supply chain.
- Learn from food safety incidents by transparent reporting and thorough investigations to prevent reoccurrences.



- Assess compliance standards at the site level and verify performance with the implementation of an auditing programme.

Signed:

Nelson Williams

Nelson Williams
Managing Director

(This policy will be reviewed in June 2022)

Pabulum Limited

Head Office – Linea House, Harvest Crescent, Fleet, Hants GU51 2UZ



PART 2 - RESPONSIBILITIES

2.1 Food Safety Responsibilities

It is recognised that everyone employed by Pabulum has food safety responsibilities. In addition, the role clients perform in working in partnership with Pabulum to ensure food safety is acknowledged.

2.2 Managing Director

- Overall responsibility and final decision on all matters of food hygiene and safety.
- To act on the information provided by the Leadership Team, or others to minimise significant food safety risks to ensure food safety.
- To review food safety performance at site locations, ensuring the robustness of monitoring and measurement systems implemented to obtain accurate data collection.
- To consider food safety as part of strategic decisions and long-term planning.
- To provide adequate resources to ensure the continued sustainability of the management of food safety across the Company and to promote a culture of compliance.
- To provide adequate budgetary provision to enable the Company to fulfil legal food safety responsibilities.
- To provide adequate budgetary provision to enable the Company to promote a culture of compliance.
- To ensure food safety is considered in a wider context of Company strategy and long-term planning.
- To review and instruct corrective actions to be taken to address significant reported risks identified in food safety performance data.
- To cascade information across the Company on decisions affecting food safety taken by the Directors and the Leadership Team.
- To act on serious food safety risks as highlighted by the Head of Food, Health & Safety, Environment.
- To seek the advice of the Head of Food, Health & Safety, Environment to inform and clarify decisions required to minimise food safety risks and promote a culture of compliance.
- To delegate day to day implementation of food safety management to the Business Director and actively monitor performance.
- To ensure effective employee communication and consultation on food safety matters, keeping Clients' informed.
- To demonstrate the Company's commitment to food safety in signing the annual policy statement.

2.3 Business Director

- To consider food safety as part of strategic decisions and long-term planning.
- To manage the implementation and performance of food safety management throughout the Company.



- To seek the advice of the Head of Food, Health & Safety, Environment to inform and clarify decisions required to minimise food safety risks and promote a culture of compliance.
- To ensure the implementation of food safety advice provided by the Head of Food, Health & Safety, Environment to minimise food safety risks within the Company.
- To monitor corrective actions delegated to the Head of Operations/Operational Managers for implementation to ensure they are effective at minimising risk following the advice provided by the Head of Food, Health & Safety, Environment.
- To monitor audit performance and achievement of KPI's by Operations Managers, taking corrective action to ensure standards are maintained and KPI's achieved.

2.4 Unit Managers/Executive Chef Managers/Head Chefs

- To supervise employees to ensure that food safety policies, procedures, and Hazard Analysis Critical Control Point (HACCP) Plans and hygienic practices are effectively implemented.
- To ensure systems are in place with the client to receive up to date information on customers with allergies. To ensure this information is communicated to employees regularly.
- To ensure employees are issued with the required protective equipment and it is stored, maintained, and used correctly.
- To ensure employees maintain high standards of personal hygiene adhering to Company standards.
- To effectively communicate and consult employees on food safety matters, documenting any outcomes that require action from regular safety meetings.
- To complete the Unit Diary on a day-to-day basis, recording any food safety concerns and actions taken to remedy.
- To assess employee training requirements and ensure they receive the correct level of food safety information that is required by the Company.
- To keep employee training records up to date and filed in the 'security box.'
- To ensure new employees receive a Pabulum induction with site-specific detail.
- To complete training organised by the Company to obtain a satisfactory pass mark
- To consistently maintain good housekeeping standards including high standards of cleanliness.
- To identify any unsafe and/or unhygienic practices during daily visual checks and in completing monthly checklists.
- To act to remedy food safety issues and unhygienic behaviours to protect the safety of food.
- To escalate issues that are beyond remit or out of direct control to the relevant Support Manager/Operations Manager/Head of Operations to address promptly with the client and/or Company.
- To escalate serious food safety matters immediately to the relevant Support Manager/Operations Manager, advising the Head of Food, Health & Safety, Environment
- To advise the relevant Support Manager/Operations Manager and Head of Food, Health & Safety, Environment during any visit received from an Enforcement Officer.



- To ensure any requests for resources to maintain food safety standards on site are documented and escalated in writing to the relevant Support Manager/Operations Manager.
- To report all food-related incidents/alleged illnesses to the relevant Support Manager/Operations Manager. In addition, to complete the Pabulum central reporting form, forwarding to Head Office promptly.
- To investigate food-related incidents/alleged illnesses and take necessary steps to prevent reoccurrences.
- To keep the relevant Support Manager/Operations Manager aware of any illness/period of absence that is related to a food incident/alleged food illness.
- To complete return to work interviews with employees, supported by the HR Team.
- To actively encourage new ideas of safer and improved ways of working from employees.
- To seek the advice of the Head of Food, Health & Safety, Environment to inform and clarify decisions required to minimise food safety risks and promote a culture of compliance.

2.5 Finance Director

- To allocate resources as recommended by the Managing Director for the effective management and maintenance of Company food safety requirements.
- To allocate resources recommended by the Managing Director to promote a culture of compliance at sites and Head Office.
- To review the budgetary performance of food safety expenditure with the relevant budget account holder(s).
- To seek the advice of the Head of Food, Health & Safety, Environment to inform and clarify decisions required to minimise food safety risks and promote a culture of compliance.

2.6 Sales and Marketing Director

- To ensure that food safety is included within tenders to enable risks to be effectively managed in new/renewing contracts.
- To liaise with the Executive Head Chef to ensure effective allergen management in food presentations and tastings.
- To seek the advice of the Head of Food, Health & Safety, Environment to support the Sales and Marketing Team to minimise food safety risks and promote a culture of compliance.

2.7 HR Manager

- To organise and ensure completion of food safety induction training for all food handlers and relevant Managers.
- To collate and store food safety training data for employees across the Company via the e-learning platform.
- To support the implementation of food safety training programmes across the Company.
- To ensure employment contracts outline the Company food safety legal requirements.



- To ensure job descriptions for all roles within the Company have relevant food safety responsibilities included.
- To monitor incidents of sickness and absence, informing the Head of Food, Health & Safety, Environment of any food-related illness from employees that may require exclusion from food handling.
- To inform the Head of Food, Health & Safety, Environment of any food complaints received from the customer's family or clients.
- To seek the advice of the Head of Food, Health & Safety, Environment in supporting the HR team to minimise food safety risks and promote a culture of compliance.

2.8 Head of Food, Health & Safety, Environment

- To guide the Company on the implementation of this food safety policy, procedures, risk assessments and safe systems of work.
- To advise Directors, Managers and their teams on practical measures required to fulfil their food safety responsibilities.
- To provide advice on how to fulfil new legal responsibilities and demonstrate compliance with guidance.
- To compile food safety performance data, incidents and issues that require consideration by the Managing Director, Business Director and Senior Leadership Team.
- To review the Food Safety Policy and associated statements on an annual basis.
- To highlight food safety matters that pose an imminent risk to health to the attention of the Business Director promptly and to advise on corrective actions required.
- To advise and recommend on the suitability of audit programmes across the Company to capture accurate food safety performance data.
- To collate and review food illness and food complaints, completing investigations of a serious nature based on the level of risk posed to the Company.
- To advise on additional control measures required to prevent the reoccurrence of food illness/complaints.
- To process claims administration, complete investigations, and compile reports, advising on matters of liability.
- To encourage communication of key safety messages throughout the Company.
- To foster relationships within the Company to disseminate key food safety messages to sites.
- To liaise with Enforcement Officers from Local Authorities on food safety matters.
- To recommend food safety measures required by Operations Managers and their teams to improve Food Hygiene Rating scores.
- To provide direction to the Company in responding effectively to enforcement challenges.
- To manage Pabulum's Primary Authority Partnership with Buckinghamshire and Surrey Trading Standards and Woking Borough Council.

2.9 Executive Development Chef

- Ensure that Operations Managers and their teams are supported in implementing food safety practices and procedures.



- In leading on menu development, to ensure that allergen management systems are implemented and adhered to in practice.
- To seek the advice of the Head of Food, Health & Safety, Environment to inform and clarify decisions required to minimise food safety risks and promote a culture of compliance.

2.10 Head of Operations

- To monitor and where necessary assist Operations Managers and their teams with the implementation of food safety systems.
- To be familiar with and have a sufficient understanding of Company policies and procedures relating to food safety and special diets.
- To follow up any areas of non-compliance with food safety practices and procedures with Operations Managers.
- To report any food safety matters that pose an imminent risk to health to the Business Director, advising the Head of Food, Health & Safety, Environment and monitoring the implementation of corrective actions.
- To co-ordinate and oversee food safety implementation regarding mobilisation of new contracts.
- To complete training organised by the Company to obtain a satisfactory pass mark.
- To seek the advice of the Head of Food, Health & Safety, Environment to inform and clarify decisions required to minimise food safety risks and promote a culture of compliance.

2.11 Head of Purchasing

- To manage the day-to-day relationship with suppliers and distribution network.
- To ensure new suppliers and contractors/contracting services complete the Company's Contractor Assessment process to verify their food safety performance.
- To create and manage the range of food items that can be purchased from certain suppliers.
- To ensure ingredient listings are accurate and kept up to date for the products supplied, identifying allergen information.
- To investigate food safety and food quality incidents with suppliers to prevent reoccurrences.
- To oversee the system to verify food safety of suppliers through third-party audit documentation/certification, audits or site visits based on risk prioritisation and incident management with the Head of Food, Health & Safety, Environment
- To seek the advice of the Head of Food, Health & Safety, Environment to inform and clarify decisions required to minimise food safety risks and promote a culture of compliance.

2.12 Senior Operations Managers and Operations Managers

- To take steps to ensure that food safety policies and procedures are understood, implemented, and practiced on a day-to-day basis at the site level.



- To complete Hazard Analysis Critical Control Point (HACCP) plans for specific site activities or events and ensure effective implementation, providing a copy to the Head of Food, Health & Safety, Environment for approval.
- To implement measures to ensure the required level of uniform or personal protective equipment is worn at the site level to protect food safety.
- To complete food safety monitoring activities periodically, ensuring that remedial actions are completed and signed off promptly.
- To provide direct support to their teams on matters relating to food safety standards to rectify any issues arising.
- To ensure food safety is included as a standard agenda item at Client meetings.
- To support Unit Managers/Support Managers in gaining Client attention in rectifying food safety issues promptly.
- To report imminent risks of food safety to the Head of Operations, advising the Head of Food, Health & Safety and Environment and ensuring implementation of corrective actions.
- To report visits from Enforcement Authorities immediately to the Head of Operations and Head of Food, Health & Safety and Environment.
- To provide the Head of Operations with an accurate account of food safety performance across sites in management regularly.
- To act to correct any unhygienic behaviours observed during site visits and document occurrence with action taken, in the Unit Diary.
- To ensure their team and sites have received the correct level of Company required training in food safety to perform their roles, with completion documented on training record cards.
- To ensure their team and sites are clear about Company expectations with regards to fulfilling food safety responsibilities.
- To liaise with the HR Manager to ensure training requirements are fulfilled and occupational health matters are addressed.
- To complete training organised by the Company to obtain a satisfactory pass mark.
- To seek the advice of the Head of Food, Health & Safety, Environment to inform and clarify decisions required to minimise food safety risks and promote a culture of compliance.

2.13 Food Development Team Members/Mobilisation Manager

- To support Operations Managers and their teams with food preparation in mobilising new sites, ensuring compliance with food safety systems.
- To implement Hazard Analysis Critical Control Point (HACCP) plans for food served at sales presentations and functions.
- To complete specific Hazard Analysis Critical Control Point (HACCP) plans for activities or events not covered by Company documentation and ensure effective implementation, providing a copy to the Head of Food, Health & Safety, Environment for approval.
- To act to correct any unhygienic behaviours observed during site visits and document occurrence with action taken, in the Unit Diary.
- To complete training organised by the Company to obtain a satisfactory pass mark.



- To seek the advice of the Head of Food, Health & Safety, Environment to inform and clarify decisions required to minimise food safety risks and promote a culture of compliance.

2.14 Support Managers

- To support Operations Managers with the completion of Hazard Analysis Critical Control Point (HACCP) plans for specific site activities or events and ensure effective implementation, providing a copy to the Head of Food, Health & Safety, Environment for approval.
- To notify the relevant Operations Manager of the occurrence of any food safety hazards on sites.
- To notify the relevant Operations Manager of the outcomes of food safety investigations completed by the Unit Manager and corrective actions taken to prevent reoccurrences.
- To keep the relevant Operations Manager aware of any absence related to food illness/incidents and outcomes of completed return to work interviews by Unit Managers.
- To complete food safety checks as delegated by the relevant Operations Manager and ensure that any remedial actions are completed and signed off promptly
- To report any food safety matters to the client that require attention to remedy promptly and record meetings, with actions taken to resolve in the Unit Diary.
- To provide training and direct support to Unit Managers on food safety systems to enable effective inductions to ensure safe and hygienic working practices are maintained.
- To provide training and direct support to Unit Managers on the contents of HACCP Plans, including safe and hygienic practices to enable information to be cascaded to site employees.
- To monitor site compliance in wearing and maintaining the required level of uniform and personal protective equipment for tasks completed at the site.
- To complete training organised by the Company to obtain a satisfactory pass mark.
- To seek the advice of the Head of Food, Health & Safety, Environment to inform and clarify decisions required to minimise food safety risks and promote a culture of compliance.

2.15 Employees (Including Agency Staff and Contractors)

- To perform all activities safely and hygienically, following Company policies and procedures to protect the safety of food.
- To take reasonable care to ensure food safety risks are minimised by following appropriate hygienic behaviours.
- To maintain high standards of personal hygiene at all times.
- To follow all food safety rules and guidelines as directed by their Line Manager.
- To report anything that is wrong and could lead to service of unsafe food to their Line Manager.
- To co-operate with the Company in protecting the safety of food from contaminants by wearing and maintaining personal protective equipment, reporting any defects to their Line Manager.



- To launder their uniforms following Company guidance.
- To report all food complaints or alleged food illnesses from customers or clients to their Line Manager.
- To report any sickness personally suffered to their Line Manager before attending site.
- To complete Company induction training, implementing knowledge and skills learnt.
- To complete Company training and obtain a satisfactory pass mark in the designated Food Safety module.
- To be aware of any food safety hazards and to advise their Line Manager immediately, only acting if it does not endanger their safety or the safety of food.
- To not interfere with any measures provided to protect the safety of food.
- To make suggestions to improve food safety in their workplace.
- To ensure adherence to Company and client rules and for schools that declare certain allergens are not to be brought onsite e.g., nut or peanuts.

2.16 Clients

The Client holds responsibility for the kitchen and environment in which Pabulum operate. Unless superseded by contractual terms and conditions, the following apply:

- To co-ordinate and co-operate with Pabulum on food safety matters affecting the catering operation and employees.
- To ensure customer allergen information is provided to Pabulum and kept up to date regularly.
- To communicate to Pabulum if food complaints and/or alleged food illnesses are reported to facilitate an appropriate investigation.
- To provide and maintain an adequate supply of hot and cold water at safe temperatures to the kitchen and associated areas.
- To provide and maintain a supply of potable cold water suitable for washing food and to provide drinking water.
- To provide and maintain satisfactory sanitary and personal washing facilities for employees.
- To provide and maintain adequate lighting and ventilation throughout catering areas.
- To provide regular refuse collection, with adequate external receptacles for disposal and storage.
- To repair and maintain their equipment that is sufficiently guarded to ensure legal compliance, attending to faults promptly.
- To repair and maintain the fabric and structure of the kitchen and associated areas.
- To put in place arrangements to control food pests.
- To arrange for periodic deep cleaning of the kitchen and ventilation ducting where required by contract.
- To arrange for filters in the ventilation canopy to be removed regularly for Pabulum to clean and replace on completion.
- To repair and maintain the electricity and gas supply, testing gas appliances on an annual basis, providing Pabulum with copies of documentation to confirm the safety.



PART 3 - FOOD SAFETY PROCEDURES

3.0. Food Safety Procedures

Pabulum has put in place and implemented a food safety management system based on the HACCP principles. Refer to separate food safety procedures covering all aspects of our food business. These are available in hard copy or via Pabunet.

