

Food Safety Policy

PART 1 – FOOD SAFETY POLICY STATEMENT

- 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 at least 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** 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

- To provide safe and hygienic work environments working together with our clients.
- To co-operate fully with all external authorities to demonstrate fulfilment of our legal duties, industry good practice and client requirements.
- To implement a food safety management system based on the HACCP (Hazard Analysis Critical Control Points) principles.
- To keep comprehensive records to demonstrate that the food safety management system is being effectively implemented and maintained.
- To provide an appropriate level of information, instruction training and supervision to ensure employees are competent to protect food safety.
- To consult and engage employees, clients, customers, contractors, and suppliers on matters relating to food safety.
- To ensure effective systems of traceability and recall are in place within our supply chain.
- To learn from food safety incidents by transparent reporting and thorough investigations to prevent reoccurrences.
- To assess compliance standards at site level and verify performance with the implementation of an auditing programme.
- To review this policy regularly.



Signed:

Nelson Williams

Nelson Williams
Managing Director

(This policy will be reviewed in June 2023)

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

- Has overall responsibility and final decision on all matters of food hygiene and safety.
- Will act on the information provided by the Leadership Team, or others to minimise significant food safety risks to ensure food safety.
- Will consider food safety as part of strategic decisions and long-term planning.
- Will provide adequate resources to ensure the continued sustainability of the management of food safety across the Company and to promote a culture of compliance.
- Will provide adequate budgetary provision to enable the Company to fulfil legal food safety responsibilities and promote a positive food safety culture.
- Will ensure food safety is considered in a wider context of Company strategy and long-term planning.
- Will cascade information across the Company on decisions affecting food safety taken by the Directors and the Leadership Team.
- Will act on serious food safety risks as highlighted by the Head of Food, Health & Safety, Environment.
- Will 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.
- Will delegate day to day implementation of food safety management to the Business Director and actively monitor performance.
- Will demonstrate the Company's commitment to food safety in signing the annual policy statement.

2.3 Business Director

- Will consider food safety as part of strategic decisions and long-term planning.
- Will manage the implementation and performance of food safety management throughout the Company.
- Will review food safety performance at site locations, ensuring the robustness of monitoring and measurement systems implemented to obtain accurate data collection.
- Will review and instruct corrective actions to be taken to address significant reported risks identified in food safety performance data.
- Will 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.
- Will ensure the implementation of food safety advice provided by the Head of Food, Health & Safety, Environment to minimise food safety risks within the Company.



- Will ensure effective employee communication and consultation on food safety matters, keeping Clients informed.
- Will 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.
- Will 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/Catering Managers

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



- Will investigate food-related incidents/alleged illnesses and take necessary steps to prevent reoccurrences.
- Will keep the relevant Support Manager/Operations Manager aware of any illness/period of absence that is related to a food incident/alleged food illness.
- Will complete return to work interviews with employees, supported by the HR Team.
- Will actively encourage new ideas of safer and improved ways of working from employees.
- Will 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

- Will allocate resources as recommended by the Managing Director for the effective management and maintenance of Company food safety requirements.
- Will allocate resources recommended by the Managing Director to promote a culture of compliance at sites and Head Office.
- Will review the budgetary performance of food safety expenditure with the relevant budget account holder(s).
- Will 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

- Will ensure that food safety is included within tenders to enable risks to be effectively managed in new/renewing contracts.
- Will liaise with the Executive Head Chef to ensure effective allergen management in food presentations and tastings.
- Will 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 Head of People

- Will organise and ensure completion of food safety induction training for all food handlers and relevant Managers.
- Will collate and store food safety training data for employees across the Company via the e-learning platform.
- Will support the implementation of food safety training programmes across the Company.
- Will ensure employment contracts outline the Company food safety legal requirements.
- Will ensure job descriptions for all roles within the Company have relevant food safety responsibilities included.
- Will 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.



- Will inform the Head of Food, Health & Safety, Environment of any food complaints received from the customer's family or clients.
- Will 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

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

2.9 Nutritionists

- Will process medial diet applications following the medial diet policy.
- Will advise the company on matters relating to food nutrition and medial diets.
- Will provide allergen information for primary school menus.

2.10 Executive Development Chef

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



- Will lead on menu development, to ensure that allergen management systems are implemented and adhered to in practice.
- Will ensure food safety procedures are implemented during the food presentation element of the tender process.
- Will 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 Operations

- Will monitor and where necessary assist Operations Managers and their teams with the implementation of food safety systems.
- Will be familiar with and have a sufficient understanding of Company policies and procedures relating to food safety and medical diets.
- Will follow up any areas of non-compliance with food safety practices and procedures with Operations Managers.
- Will 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.
- Will co-ordinate and oversee food safety implementation regarding mobilisation of new contracts.
- Will complete training organised by the Company to obtain a satisfactory pass mark.
- Will 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 Head of Purchasing

- Will manage the day-to-day relationship with suppliers and distribution network.
- Will ensure new suppliers and contractors/contracting services complete the Company's Contractor Assessment process to verify their food safety performance.
- Will create and manage the range of food items that can be purchased from certain suppliers.
- Will ensure ingredient listings are accurate and kept up to date for the products supplied, identifying allergen information.
- Will investigate food safety and food quality incidents with suppliers to prevent reoccurrences.
- Will 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
- Will 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 Senior Operations Managers and Operations Managers

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



- Will 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.
- Will implement measures to ensure the required level of uniform or personal protective equipment is worn at site level to protect food safety.
- Will complete food safety monitoring activities periodically, ensuring that remedial actions are completed and signed off promptly.
- Will provide direct support to their teams on matters relating to food safety standards to rectify any issues arising.
- Will ensure food safety is included as a standard agenda item at Client meetings.
- Will support Unit Managers/Support Managers in gaining Client attention in rectifying food safety issues promptly.
- Will 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.
- Will report visits from Enforcement Authorities immediately to the Head of Operations and Head of Food, Health & Safety and Environment.
- Will provide the Head of Operations with an accurate account of food safety performance across sites in management regularly.
- Will act to correct any unhygienic behaviours observed during site visits and document occurrence with action taken, in the Unit Diary.
- Will 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.
- Will ensure their team and sites are clear about Company expectations with regards to fulfilling food safety responsibilities.
- Will liaise with the Head of People to ensure training requirements are fulfilled and occupational health matters are addressed.
- Will complete training organised by the Company to obtain a satisfactory pass mark.
- Will 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 Food Development Team Members/Mobilisation Manager

- Will support Operations Managers and their teams with food preparation in mobilising new sites, ensuring compliance with food safety systems.
- Will implement Hazard Analysis Critical Control Point (HACCP) plans for food served at sales presentations and functions.
- Will 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.
- Will act to correct any unhygienic behaviours observed during site visits and document occurrence with action taken, in the Unit Diary.
- Will complete training organised by the Company to obtain a satisfactory pass mark.



- Will 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 Support Managers

- Will 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.
- Will notify the relevant Operations Manager of the occurrence of any food safety hazards on sites.
- Will notify the relevant Operations Manager of the outcomes of food safety investigations completed by the Unit Manager and corrective actions taken to prevent reoccurrences.
- Will 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.
- Will complete food safety checks as delegated by the relevant Operations Manager and ensure that any remedial actions are completed and signed off promptly.
- Will 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.
- Will 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.
- Will 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.
- Will monitor site compliance in wearing and maintaining the required level of uniform and personal protective equipment for tasks completed at the site.
- Will complete training organised by the Company to obtain a satisfactory pass mark.
- Will 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.

2.16 Employees (Including Agency Staff and Contractors)

- Will perform all activities safely and hygienically, following Company policies and procedures to protect the safety of food.
- Will take reasonable care to ensure food safety risks are minimised by following appropriate hygienic behaviours.
- Will maintain high standards of personal hygiene at all times.
- Will follow all food safety rules and guidelines as directed by their Line Manager.
- Will report anything that is wrong and could lead to service of unsafe food to their Line Manager.



- Will 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.
- Will launder their uniforms following Company guidance.
- Will report all food complaints or alleged food illnesses from customers or clients to their Line Manager.
- Will report any sickness personally suffered to their Line Manager before attending site.
- Will complete Company induction training, implementing knowledge and skills learnt.
- Will complete Company training and obtain a satisfactory pass mark in the designated Food Safety module.
- Will 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.
- Will not interfere with any measures provided to protect the safety of food.
- Will make suggestions to improve food safety in their workplace.
- Will 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.

2.17 Clients

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

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

