

CHAPTER 2

ORGANISATION OF FOOD SAFETY WITHIN THE ARMED FORCES

INTRODUCTION

0201. A number of organisations (Service and Civilian) have important parts to play in ensuring that satisfactory standards of food hygiene are maintained in the Armed Forces. Each has their own particular areas of expertise and it is vital that all parties are aware of their detailed responsibilities. Close liaison and co-operation must be established and maintained. Effective food safety management is the responsibility of all personnel involved with catering throughout the command chain and the task must not be under estimated.

RESPONSIBILITIES FOR FOOD SAFETY POLICY AND ASSURANCE

0202. The personal responsibilities of the Secretary of State for Defence (S of S) for food safety policy and assurance are exercised through the Defence Environment Safety Board (DESB) via the Occupational Health and Safety Board (OHSB) and Chief of Defence Material (CDM). CDM has delegated to the DFS Team Leader, through the Defence Equipment and Support chain of command, responsibility for the following:

- a. Development, maintenance and promulgation of food safety policy for the Armed Forces in accordance with EU and National Legislation.
- b. Production of an Annual Assurance Report on food safety policy.
- c. Nomination of a focal point (DFS Team Catering Services Management) for food safety management policy within the Armed Forces.
- d. Promotion of a positive food safety management culture within the Armed Forces.
- e. Establishment of food safety management performance standards.
- f. Development and maintenance of a continuous improvement programme in food safety management performance standards.
- g. Awareness by all personnel within the command chain of their statutory food safety management responsibilities. This includes the obligation to notify the command chain of any known or potential risks to food safety to enable legal obligations to be met, and that the chain of command understands their responsibility for food safety management performance.
- h. Establishment of uninhibited and effective two-way communication channels on food safety management issues throughout the command chain.
- i. Planned approach to the identification, prioritisation and management of risk associated with food safety management.
- j. Notification of breaches in food safety legislation through the chain of command to the DFS Team.

DELEGATION AND COMMAND LINES

0203. The Defence Food Safety Management Committee will ensure that a transparent, consistent and coherent food safety management system is applied throughout the Armed Forces. DFS Team Leader will represent food safety management issues and concerns to the chain of command through Head Log (Com), DE&S.

0204. The monitoring and review of compliance with food safety management policy and food safety legislation will be conducted through the following delegation and command lines. Namely the Defence Environment Safety Board (DESB) through both the Occupational Health and Safety Board (OHSB) and Safety, Sustainable Development and Continuity (SSD&C) to DFS Team and subsequently to the three Service Home Authorities, the Front Line Commands (FLC) and the Defence Food Services Schools.,

CONTROL, CO-OPERATION, COMMUNICATION AND COMPETENCE

0205. CO/Establishment Heads and command catering staffs are to be actively involved in the process of food safety management, thereby taking ownership of a positive food safety culture which entails:

- a. **Control.** Ensuring that all food is stored, prepared and served in a safe and healthy environment. A food safety management focal point is to be appointed with the necessary competence and authority to provide assurance of compliance with statutory food safety legislation and MOD mandated requirements, throughout the food management area. Safety responsibilities of individuals and line managers are to be defined clearly, and lines of accountability documented as appropriate. This may be achieved by inclusion in Terms of Reference for each appointment.
- b. **Co-operation.** Participation and commitment in food safety management activities by all employees at all levels. This will be secured through appropriate committees and consultative groups, as well as arrangements to ensure co-operation in the management of risk with the site landlord and for the effective control of their contractors whilst working on your behalf.
- c. **Communication.** Regular and effective communication is encouraged throughout the line management chain, including regular briefings. Effective lines of communication are to be established with DFS Team via the command chain.
- d. **Competence.** Personnel at every level are to be provided with the necessary training and information to enhance and develop their knowledge and skills, to enable them to perform their duties safely, and in compliance with relevant food safety legislation.

PLANNING AND MANAGEMENT OF RISK

0206. Hazard Analysis (HA) procedures are to be conducted on all food related activities, and food-operating procedures established to control residual risks. All systems of work, operating procedures and risk assessments are to be reviewed regularly.

0207. Local management is to identify and prioritise the requirements for managing food safety risks. Reflection of these requirements in local organisation and arrangements will help develop a positive food safety management culture.

MEASURING PERFORMANCE

0208. Performance measurement is an essential ingredient of any continuous improvement programme. The effectiveness of food safety management systems is to be measured continually through active and reactive monitoring. Monitoring must be recognised as a management function, with adequate realistic objectives, resources and the commitment to implement the necessary remedial actions.

ACTIVE MONITORING

0209. As a part of routine catering inspections undertaken by commands, food safety is to be included to assure DFS Team Leader that adequate risk control systems are in place consistent with the organisation. Performance assessment is detailed in Chap 5. Action plans resulting from the inspection will provide valuable evidence in support of the DFS Team goal of continuous improvement in the management of food safety. Part of the audit process will provide evidence of best practice to be shared throughout the Armed Forces.

0210. A comprehensive and well-planned inspection programme is essential in understanding the strengths and weaknesses of achieving self-improvement. It will also provide assurance to the chain of command and the appropriate enforcing agencies, that the DFS Team is being active and effective in the provision of policy for the management of food safety risks.

0211. DFS Team is to have visibility of the systematic inspection of catering premises and equipment by command staff.

REACTIVE MONITORING

0212. It is essential that all food safety incidents are recorded, investigated and reported through the command chain. Arrangements are in place, Chap 5 refers, to ensure that DFS Team Leader is made aware of food safety incidents, including food poisoning incidents, so that policy amendments can be initiated, if required.

ANNUAL REPORT

0213. DFS Team is to submit an Annual Assurance Report on food safety policy to SSD&C, OHSB and Head Log (Com). The Annual Assurance Report will act as a cumulative record of the strategic effectiveness and weaknesses of the food safety policy and management.

DEFENCE FOOD SAFETY MANAGEMENT COMMITTEE (DFSMC)

0214. The DFSMC is accountable to DF&FS Team Leader and consists of the following members:

- a. Joint Chairman: DFS Team - Cat Svcs Mgt 1
DGAMS – SO1 EH
- b. Members: SSD and C – Occupational H&S (OHS 3).
MDG(N) – SO2 EH Pol
Navy Command - Log Sp (CS)
DGMS (RAF) – CEHO
Land Forces – Log Sp (Food Svcs)
Air Command – A4 Cat Ops
Defence Food Services School (DFSS) -
Tech Trg Offr (TTO) & Head Food Safety Trg

Defence Maritime Logistic School (DMLS):
Senior Food Hygiene Trainer
Food Standards Agency – Principal EHO
Portsmouth City Council - EHO
Rushmoor Borough Council - EHO
Wycombe District Council - EHO
DFS Team – OCM QA

c. Secretary: DFS Team – Cat Svcs Mgt 3

0215. The Defence Food Safety Management Committee is accountable for:

- a. Ensuring that the Department conducts its food safety in accordance such national, EU and international laws, obligations and agreements as apply over time.
- b. Researching and formulating Food Safety Management Policy.
- c. Providing the intelligent MoD customer focus for Food Safety Management.
- d. Producing and maintaining JSP 456 Vol 3.
- e. Consulting and liaising with single service Home Authorities and other civilian authorities as required.
- f. Ensuring the adoption of best practice across the MoD for Food Safety Management.
- g. Providing written direction as necessary on Food Safety Management.
- h. Acting upon and, when required, producing Food Safety Management Policy to meet the requirements of the DESB.

0216. The committee shall meet every six months.

CATERING PERSONNEL

0217. Food handlers employed in a managerial position within a unit act as day-to-day advisers to the CO/Head of Establishment on all catering matters (including food hygiene and safety) in accordance with this JSP. Catering managers at unit level must demonstrate compliance with this JSP by ensuring that 'Due Diligence' records (as specified within this JSP) are maintained, and by conducting periodic internal audits of the food safety management procedures.

0218. Command catering staffs are responsible for strategic management of all aspects of catering management (including food hygiene and safety) within their area. They are to follow the policy promulgated within this JSP, ensuring that ships, units and establishments within their command do the same. There may, however, be circumstances where compliance is impracticable. In these circumstances, informed judgement must be employed to ensure that the alternative action does not compromise food safety. It must be borne in mind by managers deciding on alterations to approved procedure, that qualifications such as the Advanced Food Safety Certificate do not imply specialist expertise in food safety matters, especially with regards to the detailed interpretation of the law. Such courses of action should be the exception rather than the rule and are to be taken following definitive advice through command catering staff and, if necessary their Service environmental health staff. Command catering staffs are responsible for carrying out the appropriate catering and food hygiene inspections, which concentrate on management issues.

SERVICE ENVIRONMENTAL HEALTH TEAM PERSONNEL

0219. Service environmental health team (EHT) personnel are typically established at Command HQs. They receive in-depth training in all food safety matters, including statutory requirements. They are to be regarded as the Services' in-house advisers in all environmental health related matters, including food hygiene and safety. EHT personnel carry out Medical and Environmental Health Staff Supporting Inspections on behalf of their Command. This is aimed at assessing performance across all of the areas that may affect the health of a unit, both in barracks, onboard ships or ashore, and during operations and exercises. The food safety and hygiene element of the Medical and Environmental Health Staff Inspection is to be regarded as being an External Audit, and recorded accordingly. Furthermore, Service environmental health personnel are to be regarded as the liaison link with Local Authority EHOs (LAEHO). They are to be involved early if there is likely to be a dispute, for example, following a LAEHO visit. EHT personnel will play a pivotal role during investigations into suspected outbreaks of food-borne illness.

LOCAL AUTHORITY ENVIRONMENTAL HEALTH OFFICERS

0220. The Services enjoy a good relationship with LAEHOs. However, it is not departmental policy that LAEHOs be approached in the first instance, for advice on food safety law and practice. Such matters are to be referred through command catering staffs to Service environmental health team personnel.

HOME AUTHORITY FOR FOOD HYGIENE AND SAFETY

0221. The Home Authority (HA) concept was devised by the Local Authorities Co-ordinators of Regulatory Services (LACORS), to allow national bodies to have a single Local Authority designated as its point of contact for matters relating to food hygiene and safety. The principles of HA liaison is:

- a. To provide a single point of contact and a forum for policy discussions.
- b. To help ensure uniformity of approach.
- c. To help ensure conformity with legislation and adherence to valid guidance.

HOME AUTHORITY ARRANGEMENTS

0222. The Services have HA arrangements as follows:

- a. RN - Portsmouth City Council.
POC: Environmental Health Division, Portsmouth City Council, Guildhall Walk, Portsmouth, Hampshire PO1 2AZ
- b. Army – Rushmoor Borough Council.
POC: Directorate of Environmental Services, Rushmoor Borough Council, Council Offices, Farnborough Road, Farnborough, Hampshire GU14 7JU
- c. RAF – Wycombe District Council.
POC: Divisional Environmental Health Division, Wycombe District Council, Queen Victoria Road, High Wycombe, Buckinghamshire, HP11 1BB.

0223. Whilst HQ NAAFI and respective contractors are responsible for the management of all CRL within establishments, they are also encompassed within Single Service Home Authority arrangements.

OBTAINING HOME AUTHORITY ASSISTANCE/ADVICE

0224. Matters of dispute between Service units/establishments and Local Authorities that cannot be satisfactorily resolved at local or Service liaison meeting level, are to be referred through the command chain to the DFSMC, who will refer the matter to the Defence HA. They will respond to strategic food safety issues that cannot be resolved by Single Service Liaison meetings.

TERMS OF REFERENCE – DEFENCE HOME AUTHORITY

0225. The Defence HA Committee will consist of:

- a. DFS Team – Cat Svcs Mgt 1 (Chair) and Cat Svcs Mgt 3 (Sec).
- b. RN – MDG(N) - SO2 EH Pol & RN HA.
- c. Army – DGAMS - SO1 EH & Army HA.
- d. RAF – DGMS(RAF) - CEHO & RAF HA.

0226. The Defence HA Committee will be responsible for:

- a. Provision of strategic Defence HA food safety advice and guidance to the Armed Forces through the DFSMC and single Service HA liaison meetings on policy and technical issues.
- b. Response to enquiries raised by single Service HA.
- c. Arbitration between single Service HA with regard to food safety issues that cannot be satisfactorily resolved at local level. The Defence HA may refer to the FSA and/or LACORS for a definitive view.

0227. The Defence HA Committee will meet on an 'as required' basis.