

# HOUSE RULES

## CROSS CONTAMINATION PREVENTION

The House Rules Section contains 6 sub-sections each of which covers a particular subject of food safety management.

Every House Rule sub-section begins with guidance and then provides advice on how to write your own House Rules.

A template is then provided for use when writing the House Rules.

Your House Rules should reflect your current safe working practices on the 6 food safety subject areas covered in this manual.

### WHAT YOU NEED TO DO

- Read the guidance provided at the beginning of this sub-section
- Draw up your own House Rules describing how you intend to prevent cross contamination in your business
- Once you have completed all your House Rules, remember to update your Action Plan

Think about the cross contamination prevention practices that you already have in place. It is possible that you will simply have to write these down to produce your Cross Contamination Prevention House Rules.

**THE CROSS CONTAMINATION PREVENTION HOUSE RULES ARE AN ESSENTIAL COMPONENT OF YOUR HACCP BASED SYSTEM AND MUST BE KEPT UP TO DATE AT ALL TIMES**

# HOUSE RULES

## CROSS CONTAMINATION PREVENTION

The easiest and most reliable way to prevent cross contamination in a Butchers' shop is through **Permanent Physical Separation** of all areas, surfaces, utensils, staff and equipment used for the handling and preparation of ready-to-eat food. Butcher**Safe** is designed to encourage butchers to use **Permanent Physical Separation** as much as possible.

### What is Cross Contamination?

Cross contamination occurs when people fail to follow safe food handling practices and harmful bacteria are transferred from contaminated food to uncontaminated food. There are two main forms of cross contamination:

- **Direct Cross Contamination** – direct contact between raw food and ready-to-eat food during transport, storage or preparation.
- **Indirect Cross Contamination** – spread of bacteria from raw food to ready-to-eat food indirectly by hands, equipment, surfaces, protective clothing or cloths.

### Why is it important to prevent Cross Contamination?

Cross contamination has frequently been found to be the cause of food poisoning outbreaks. Bacteria in contaminated food are not visible to the naked eye and do not cause noticeable food spoilage or affect taste, smell or texture. For this reason ready-to-eat food must be protected from cross contamination at all times, because there are no further controls to protect your customers from the risk of food poisoning, once contamination has taken place.

Cross contamination is a particular hazard in butchers' shops because of the high volume of raw meat handling, and in many cases also handling and preparation of a wide range of ready-to-eat food, often in relatively small premises.

**There is a risk of *E. coli* 0157 cross contamination in any food business where both raw food and ready-to-eat food is handled. Major *E. coli* 0157 outbreaks occurred in Scotland in 1996 and Wales in 2005 and were attributed to poor food handling practices which led to cross contamination.**

*E. coli* 0157 is a particularly dangerous organism because:

- It can lead to serious untreatable illness and even death.
- It is reported to have a very low infective dose (less than 100 bacteria can cause illness).
- It has the ability to survive refrigeration, freezing and environments which have a low pH or reduced water activity.

These Butcher**Safe** procedures will also help control cross contamination risks from other food poisoning bacteria such as *Campylobacter* and *Salmonella*.

### Which raw food provides the main sources of Cross Contamination?

The following raw food presents a potential source of cross contamination and should be handled with care:

- **Raw meat** such as beef, pork, lamb, chicken, turkey and game.
- **Raw meat products** such as sausages and burgers.
- **Eggs.**
- **Visibly dirty vegetables** such as potatoes, leeks and carrots.

**Vegetables and fruit** that have **not** been labelled as ready-to-eat should be washed (and if necessary peeled) prior to consumption or any further processing, examples include tomatoes, lettuce and white cabbage.

**Important** Unless the label states that the produce is ready-to eat you must assume that it will require to be washed (and if necessary peeled), prior to consumption or any further processing.

#### **Food which may be treated as either raw or ready-to-eat**

For example black pudding, haggis, fruit pudding and dumplings

There are some cooked foods which might not be considered ready-to-eat because they will normally be re-heated before eating.

1. When these foods have been manufactured by you, they can be treated as **either raw or ready-to-eat**. Whichever way you choose to treat the food, you must do so consistently and write this down in your House Rules.
2. Where these foods have been bought-in they should be treated as raw, unless you know for certain that they have been handled as ready-to-eat at every stage since manufacture.

**Note: Always classify food as raw where any uncertainty exists** and advise your customers to thoroughly reheat the food before eating. For example, display a notice at point of sale or put the information on the label of pre-packaged food.

## CROSS CONTAMINATION PREVENTION GUIDE TO COMPLIANCE

The easiest and most reliable way to prevent cross contamination in a Butchers' shop is through **Permanent Physical Separation**. This involves the systematic separation of all areas, surfaces, utensils, staff and equipment used for the handling and preparation of ready-to-eat food. The table below shows you how to do this.

**IMPORTANT: Implement Permanent Physical Separation wherever possible, only after all options have been considered should you then resort to implementing Alternative Procedures. Information on how to do this can be found on the following pages.** Please note that the information is presented in alphabetical order.

### SEPARATION

<p><b>AREAS</b> Identify a permanent ready-to-eat food area for receipt, handling and preparation of ready-to-eat food only.</p> <p><b>Additional Good Practice</b> Provide separate hand washing facilities in the ready-to-eat area.</p>
<p><b>CHILL (WALK-IN)</b> Designate the walk-in chill for raw food only.</p>
<p><b>CLEANING EQUIPMENT</b> Provide separate identifiable cleaning equipment for the ready-to-eat food area and surfaces. Examples include: cloths and spray bottles.</p>
<p><b>COMPLEX EQUIPMENT must <i>never</i> be shared between ready-to-eat food and raw food use.</b> Examples include: vacuum-packing machine, mincer, meat slicing machine, scales and weighing machine.</p>
<p><b>COOLING</b> Use a blast chill if available</p> <p>or cool food in the permanent ready-to-eat area</p> <p>or cool in the ready-to-eat refrigerator</p> <p>or in the case of bagged food – cool in a sink for ready-to-eat food only.</p>
<p><b>DEFROST</b> Defrost ready-to-eat food in the refrigerator and defrost raw food in the chill.</p>
<p><b>DISPLAY AND SALE</b> Organise the front shop into two separate permanent food areas – a raw food area and a ready-to-eat food area. Designate separate refrigerated display cabinets with dedicated equipment, utensils, wrapping materials, trays, display tickets, garnishes and also introduce a separate till for use in the ready-to-eat food area only.</p>
<p><b>FOOD CONTACT EQUIPMENT AND UTENSILS</b> Use separate colour-coded or easily-identifiable equipment and utensils for handling ready-to-eat food.</p>
<p><b>FOOD HANDLING STAFF</b> Designate a separate member of staff to handle ready-to-eat food only.</p>
<p><b>REFRIGERATOR</b> Designate the refrigerator for ready-to-eat food only.</p>
<p><b>WORK SURFACE</b> Designate a permanent work surface for receipt, handling and preparation of ready-to-eat food only.</p>

## ALTERNATIVE PROCEDURES

Only if Permanent Physical Separation is not possible, should Alternative Procedures be considered.

**Remember: The controls that you implement must be realistic and effective and be capable of being implemented at all times including during busy periods.** The tables below show Separation and Alternative Procedures.

### AREAS

Separation	Alternative Procedures
<p>Identify a permanent ready-to-eat food area dedicated to the receipt, handling and preparation of ready-to-eat food only.</p> <p><b>Additional Good Practice</b></p> <p>Provide separate hand washing facilities in the ready-to-eat area.</p>	<p><b>Introduce a temporary ready-to-eat food area</b></p> <p>Within the raw food area a temporary ready-to-eat area can be used at pre-arranged times but only when the following procedures are strictly applied:</p> <p><b>Cleaning and disinfection</b> – All surfaces must be smooth, impervious and capable of being thoroughly cleaned and disinfected before being used for any ready-to-eat food receipt, handling or preparation (refer to the <b>Cleaning House Rules</b> for more information)</p> <p><b>Shared delivery</b> – Ensure that raw and ready-to-eat food are adequately wrapped, packaged and stored separately in the delivery vehicle.</p> <p><b>Shared hand washing</b> – A shared wash hand basin may be used for both the raw and ready-to-eat food areas, provided adequate measures are in place to prevent the recontamination of hands by the taps after hand washing (refer to the <b>Personal Hygiene and Training House Rules</b> for more information)</p> <p><b>NOTE: it is considered good practice to install non-hand operable taps.</b></p>

**Note:** No food, either raw or ready-to-eat can come into direct contact with a work surface – use cutting boards and containers.

### CHILL (WALK-IN)

Separation	Alternative Procedures
<p>Designate the walk-in chill for raw food only.</p>	<p><b>Use a chill for both raw and ready-to-eat food.</b> This is a particularly difficult option and will require additional hand washing, disinfection and management checks, whilst ensuring that robust Corrective Actions are in place.</p> <p><b>Ensure the chill is large enough.</b> Both raw and ready-to-eat food may be chilled in the same chill, provided that the equipment is large enough for safe separation at all times.</p> <p><b>Designate permanent separate raw and ready-to-eat areas within the chill.</b> The ready-to-eat food, where possible, should be placed in sealed containers in a permanent separate area within the chill. Where ready-to-eat food cannot be stored in sealed containers, particular care should be taken to protect the food from contamination.</p> <p><b>Hand Contact.</b> On removing ready-to-eat food containers from the chill, ensure strict hand washing procedures are adhered to (refer to the <b>Personal Hygiene and Training House Rules</b> for more information)</p>

## CLEANING EQUIPMENT

**Cleaning Equipment** used incorrectly can cause cross contamination. For example, where a cloth is used to clean and disinfect a raw food area and then used to clean a ready-to-eat food area, harmful bacteria may be transferred to the ready-to-eat food area.

Separation	Alternative Procedures
Provide separate identifiable cleaning equipment for the ready-to-eat food area and surfaces. Examples include cloths and spray bottles.	There are no acceptable alternatives.

## COMPLEX EQUIPMENT

Complex equipment cannot be readily cleaned and disinfected and must never be shared between ready-to-eat food and raw food use. Separate complex equipment is the only safe option. Examples include: vacuum-packing machine, mincer, meat slicing machine, scales and weighing machine.

**Important: If you purchase second hand or reconditioned complex equipment you must obtain documentary evidence that the equipment has been effectively decontaminated.**

Separation	Alternative Procedures
Complex equipment must <b>never</b> be shared between ready-to-eat food and raw food use	There are no acceptable alternatives.

## COOLING

The **Temperature Control House Rules** section of ButcherSafe explains why cooked food needs to be cooled down as quickly as possible. Make sure that cooling food is not at risk of cross contamination from raw food.

Separation	Alternative Procedures
Use a blast chill if available	<p><b>Designate a Temporary Cooling Area.</b> This area may be used at other times for raw food.</p> <p><b>Cleaning and Disinfection.</b> The surfaces of a Temporary Cooling Area must be thoroughly cleaned and disinfected before being used to cool food.</p> <p><b>Prevent Direct Contact.</b> Cooling food must never come into direct contact with the surfaces of a Temporary Cooling Area.</p> <p><b>Cool in a sink.</b> This may be done in a bag or sealed container. The sink should be thoroughly cleaned and disinfected <b>before</b> being used for cooling food.</p> <p><b>Cool in a chill which is also used for raw food.</b> Both raw and ready-to-eat food may be placed in the same chill provided that the chill is large enough to enable safe separation and safe handling practices are followed at all times.</p>
<b>or</b>	
Cool food in the permanent ready-to-eat area	
<b>or</b>	
Cool food in the ready-to-eat refrigerator	
<b>or</b>	
Cool bagged food in a sink for ready-to-eat food only.	

## DEFROSTING

**Separation**

Defrost ready-to-eat food in the refrigerator and defrost raw food in the chill.

**Alternative Procedures**

**Use a shared chill/refrigerator for defrosting.** Both raw and ready-to-eat food may be placed in the same chill or refrigerator provided that the equipment is large enough for safe separation and that safe handling practices are followed at all times.

**Contain juices.** Make sure that water and juices from defrosting raw food cannot drip onto or contact ready-to-eat food. Defrost raw food below ready-to-eat food.

**Protect ready-to-eat food.** Ready-to-eat food being defrosted must be protected from contamination by raw food.

**Defrost in a sink.** Raw food may be defrosted in a sealed container, placed in a clean sink under cold running water. After the defrosting process, the sink must be cleaned and disinfected.

**Hand Contact.** On removing ready-to-eat food containers from the refrigerator, ensure strict hand washing procedures are adhered to (refer to **Personal Hygiene and Training House Rules** for further information).

## DISPLAY AND SALE

Care must be taken to ensure that ready-to-eat food is not contaminated by raw food during display and sale. The risk is greater where a shared display cabinet is used.

**Separation**

Organise the front shop into two separate permanent food areas – a raw area and a ready-to-eat area with separate refrigerated display cabinets. Use dedicated equipment, utensils, wrapping materials, trays, display tickets and garnishes for each area. Introduce a separate till for use in the ready-to-eat food area.

**Alternative Procedures**

**Shared display cabinets** Ensure that full height separation is fitted inside shared display cabinets between raw and ready-to-eat food areas. Full height separation means that the cabinet is divided by a solid, cleanable panel or screen which fills the entire cross-section of the display cabinet area.

When using **ButcherSafe** there is no alternative to using dedicated equipment and utensils, wrapping materials, trays, display tickets and garnishes for ready-to-eat food use.

**Shared till** Where only one till is available, great care must be taken to avoid contaminating the surfaces, especially after handling raw food. It is essential that food handlers wash their hands after touching the surfaces and before handling any ready-to-eat food.

**Shared non-food contact surfaces** It should be assumed that non-food contact surfaces are already contaminated and careful hand washing should follow direct contact, examples include light switches, spectacles, pens and notebooks, phones, chip & pin machines or money.

## FOOD CONTACT EQUIPMENT AND UTENSILS

Food Contact Equipment and Utensils must never be used for both raw and ready-to-eat food. Examples include: knives, tongs, scoops, chopping boards, storage containers, display trays, probe thermometers and cling film.

### Separation

Use separate colour-coded/easily-identifiable equipment and utensils for handling ready-to-eat food.

### Alternative Procedures

When using ButcherSafe it is not acceptable to have any equipment and utensils used for both ready-to-eat and also for raw food use.

**Remember:** robust measures must be in place to prevent the incorrect use of equipment.

## FOOD HANDLING STAFF

### Separation

Designate separate staff to only handle ready-to-eat food.

### Alternative Procedures

**Staff are permitted to handle both raw and ready-to-eat food provided that these procedures are followed. This is a particularly difficult option and will require additional hand washing, disinfection and management checks. Robust Corrective Actions must also be in place.**

**Time** – Restrict ready-to-eat food handling to specific staff at specific times of the day.

**Workflow** – Arrange the workflow to minimise staff alternating between handling raw food and then handling ready-to-eat food.

**Work Activity** – Restrict staff engaged in major raw meat activities, such as de-boning, manufacturing so that they are not required to handle ready-to-eat food while carrying out these activities.

**Hand washing** – Ensure strict hand washing procedures are in place when moving from handling raw food to handling ready-to-eat food (refer to your **Personal Personal Hygiene and Training House Rules** for further information)

**Hand Contact** – Introduce barriers such as tongs or plastic film to avoid direct hand contact with food at the service counter.

**Protective Clothing** – Staff handling both raw and ready-to-eat food at the service counter present a risk of cross contamination from soiled coats/ aprons onto ready-to-eat food and equipment. Although it is not necessary to change protective clothing when moving from raw to ready-to-eat food on every occasion, the following points should be considered:

- Changing into a clean white coat once it is visibly soiled
- Wear an apron over the white coat when handling ready-to-eat food.



## REFRIGERATOR

The use of a refrigerator for the storage of both raw and ready-to-eat food presents a significant risk of cross contamination if not managed properly. Butcher**Safe** advises against this practice.

### Separation

Designate the refrigerator for ready-to-eat food only.

### Alternative Procedures

**Shared refrigerator.** If a refrigerator is of a sufficient size, it can be used to store ready-to-eat food and raw food at the same time. Store raw food on the bottom shelves and always below ready-to-eat food.

**Separate containers.** When using Butcher**Safe** use separate colour coded/identifiable lidded containers for ready-to-eat food.

**Disinfect** the outside surfaces of ready-to-eat food containers after removing them from shared storage and ensure strict hand washing procedures are in place (refer to your **Personal Hygiene and Training House Rules** for further information).

**Note:** When using shared storage there will be a greater requirement for hand washing and cleaning/disinfection to prevent cross contamination.

## WORK SURFACES

In Butcher**Safe** it is strongly recommended that at least one permanent surface area is provided for ready-to-eat food work. The handling, cooling and preparation of all ready-to-eat food should be carried out exclusively in this area. Where this is not possible, the alternative arrangements may be used.

### Separation

Designate a permanent work surface for receipt, handling and preparation of ready-to-eat food only.

### Alternative Procedures

**A temporary ready-to-eat work surface** may be used for raw food work if the following procedures are followed:

**Time** – Restrict ready-to-eat food work to specific times of the day

**Cleaning and disinfection** – All work surfaces must be smooth, impervious and capable of being thoroughly cleaned and disinfected before being used for ready-to-eat food work (refer to your **Cleaning House Rules** for further information)

**Note: It is much more difficult to carry out these alternative procedures, which can only be relied upon if cleaning, disinfection and rigorous hand washing practices are strictly adhered to at all times.**

**Note:** No food, either raw or ready-to-eat can come into direct contact with a work surface – use cutting boards and containers.

### What if I can't implement Permanent Physical Separation completely?

Butchers should try to implement **Permanent Physical Separation** as much as possible.

**Note:** When using ButcherSafe your equipment, utensils and packaging should always be separate, for the exclusive use of ready-to-eat food with no exceptions.

However, it is recognised that it may not always be possible to provide separate areas, surfaces or staff on a permanent basis, particularly in smaller premises. Therefore, Alternative Procedures may be used after having considered all separation options first.

It is also possible that your normal business operations make use of certain Separation or Alternative Procedures difficult. In this instance, you should consider a broader review of your business and consider ways in which you can make your operation safer.

The following table provides examples of practical problems in trying to prevent cross contamination and provides solutions to consider.

Problem	Consider this ...
You have a small shop and don't have any free space.	Check to see if additional space can be found elsewhere on the premises. Discard obsolete equipment and put rarely used equipment into storage to free up more space.
The layout of your premises won't allow the separation of raw and ready-to-eat food processes.	Re-consider how you work to find alternatives to improve physical separation. Manufacture raw and cooked products on separate days.
You handle a wide range of ready-to-eat food as well as raw food so you need to use all areas and surfaces for both food types.	Scale down the amount of ready-to-eat food handled. A commercially desired throughput should never be at the expense of food safety. Alternatively, reduce the amount of open ready-to-eat food handled by, for example purchasing pre packed sliced cooked meats.
You don't have enough staff to nominate one person for handling ready-to-eat food only.	Organise work schedules to ensure food handlers carrying out major raw meat activities including de-boning and manufacturing are not required to handle ready-to-eat food while carrying out these duties.

## WHAT YOU NEED TO DO NOW

To effectively manage the Cross Contamination Prevention part of your HACCP based system and using the information for guidance, you will also be asked to complete your House Rules in 2 parts:

1. Write down how you handle certain cooked food that may NOT be considered as ready-to-eat and will require further heating prior to consumption, and then
2. Write a list of House Rules covering Cross Contamination Prevention.

Here is an example of how you could write your House Rules:

	Describe: <ul style="list-style-type: none"> <li>• Monitoring including frequency</li> <li>• Control Measures and Critical Limits (where applicable)</li> </ul>
Areas	<p><i>Back shop: Small stainless steel table located next to the refrigerated display is the permanent surface for receipt, handling and preparation of ready-to-eat food only.</i></p> <p><i>Front shop: The ready-to-eat food section of refrigerated display is the permanent ready-to-eat food surface. The stainless steel table and shelves below this counter are permanently for ready-to-eat food use, this includes the slicing machine and wrapping materials.</i></p> <p><i>Monitoring by visual checks.</i></p>

## Monitoring and Recording

Much of the monitoring of cross contamination prevention will rely on visual checking. This can be made easier by using colour coded/identifiable equipment and disposable plastic aprons. You must carry out suitable monitoring to ensure that your Cross Contamination Prevention House Rules are implemented at all times. Any failure to adhere to these Rules should be considered to be **a very serious matter** and must trigger Corrective Action to prevent the supply of unsafe food.

### Corrective Action (What to do if things go wrong)

Corrective Action should be predetermined and written into your House Rules. Examples include:

- Disposal of ready-to-eat food which may have been in contact with a contaminated surface.
- Clean and disinfect the work surfaces and equipment again.
- Retrain staff on the importance of cross contamination prevention.

Corrective Actions should be written down in the **Supervisor Checks record**. This will help you to ensure that any failure is not repeated and demonstrate that no unsafe food was supplied.

*All Records of Monitoring and Corrective Action(s) taken should be kept for an appropriate period of time to demonstrate that your HACCP based system is working effectively.*

## Action Plan

Once you have completed all your House Rules, remember to update your Action Plan.

**The Cross Contamination Prevention House Rules are an essential component of your HACCP based system and must be reviewed and kept up to date at all times. Your House Rules need to be written to accurately reflect how you run your business.**

## HOUSE RULES CROSS CONTAMINATION PREVENTION

**Part 1:** Earlier in this sub section, guidance was given on certain cooked food that may **NOT** be considered as ready-to-eat and will require further heating prior to consumption. Write down in this table how you handle these products:

Products	Handled as ready-to-eat	Handled as raw	I do not sell this product
Pies			
Puddings			
Haggis			
Dumplings			
Potato scones			

**Part 2:** Now write your **House Rules** in the table below:

	Describe: <ul style="list-style-type: none"> <li>Monitoring including frequency</li> <li>Control Measures and Critical Limits (where applicable)</li> </ul>
Areas	
Chill (Walk in)	
Cleaning Equipment	
Complex Equipment	
Cooling	

<b>Defrosting</b>	
<b>Display and Sale</b>	
<b>Food Contact Equipment and Utensils</b>	
<b>Food Handling Staff</b>	
<b>Refrigerator</b>	
<b>Work Surfaces</b>	
<b>Monitoring, checking and any other appropriate records used by your business</b>	

<p>My Corrective Actions</p> <ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> <li>•</li> </ul>
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Signed ..... Date .....

Position in the business .....