Chapter 8 Personal Hygiene

8. Introduction

8.1. Fitness to work questionnaire
8.2. Risk factors and preventative measures
8.3. Legal requirements for personal hygiene
   A. Personal cleanliness and behaviour
   B. Handwashing facilities
   C. Illness
8.4. Official control requirements
Annex 1. Pre-employment questionnaire example
8. Introduction

People employed in, or visiting, food plants can be a potential source of microbiological, chemical and physical hazards. Procedures are needed to minimise the risk of such hazards causing illness or injury to consumers.

Examples demonstrating the importance of personal hygiene:

<table>
<thead>
<tr>
<th>Problem</th>
<th>Effect</th>
<th>Possible outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Handling food, coughing over food, or food coming into contact with dirty clothing</td>
<td>Bacteria (germs) may be transferred from people to food</td>
<td>A source of microbiological contamination</td>
</tr>
<tr>
<td>Staff or visitor illness</td>
<td>Staff or visitors suffering from an infection that can be transmitted by food</td>
<td>A source of microbiological contamination of food products by bacteria (such as Salmonella, viral gastro-enteritis, bacterial skin infections, typhoid or dysentery)</td>
</tr>
<tr>
<td>Foreign objects coming into contact with food</td>
<td>Hair, pieces of jewellery, pencils, buttons, fibres from clothing, for example, may fall onto food</td>
<td>A source of physical or microbiological contamination</td>
</tr>
<tr>
<td>Movement of staff or visitors around a food plant</td>
<td>Dirt and bacteria on clothing or footwear may be transferred around the plant, especially if staff or visitors pass from dirty to clean areas</td>
<td>Increased chance of microbiological cross contamination of food products by food poisoning bacteria (such as Campylobacter and Salmonella)</td>
</tr>
</tbody>
</table>
8.1. Fitness to work questionnaire

Take steps to prevent the introduction of infection into the workplace and subsequently into food by food handlers.

See ‘Annex 1.’ for a pre-employment questionnaire example. This questionnaire can be used to screen food handlers.

A pre-employment questionnaire can also be downloaded from the FSA website at: www.food.gov.uk/business-industry/meat/haccpmeatplants/ - click on ‘model documents’. It is also available on the FSS website at: http://www.foodstandards.gov.scot/downloads/Food_Handlers_-_Fitness_to_work.pdf - see Annex 3.

8.2. Risk factors and preventative measures

- Food business managers must encourage prompt reporting of diarrhoea and vomiting and anyone with these symptoms should report to their manager and leave the food handling area immediately. Clean and disinfect all surfaces with which the person has had contact (for example, work areas, toilets). If symptoms persist the person should seek medical advice.

- Staff with infections such as Enteric fever, Vero cytotoxin-producing Escherichia coli (VTEC) and Hepatitis A should seek professional medical advice.

- Food handlers with lesions on exposed skin (hands, face, neck, or scalp) that are actively weeping or discharging must be excluded from handling food until the lesions have healed.

- Any food handler whose eyes, ears or mouth or gums are weeping or discharging must be excluded from food handling until they are better.

8.3. Legal requirements for personal hygiene

The following sections set out the personal hygiene requirements of the regulations that apply to slaughter, dressing and further processing of meat.

A. Personal cleanliness and hygiene

Legal requirement
852/2004 Annex II Training: Chapter XII point 1

A1. FBOs are to ensure that food handlers are supervised and instructed and/or trained in food hygiene matters commensurate with their work activity.

A1. Compliance regarding training, instruction and supervision

- Make sure that food handling staff are supervised and receive instruction or training on food hygiene matters commensurate with their work activity.

A1. Good practice

Provide clear and simple written instructions to all staff before they start to handle food or to work in food-handling areas on the company’s requirements for personal behaviour, particularly handwashing and including the use of protective clothing and the reasons for them. Supervise as appropriate and issue reminders if lapses occur.

Keep accurate individual training records to show what instruction has been given. See chapter 7 on ‘Training’ for additional information.

Tip

Staff illness agreement – Consider asking staff to sign a statement that they have read and understood the instructions.

Legal requirement
852/2004 Annex II Personal Hygiene: Chapter VIII point 1

A2. Every person working in a food-handling area is to maintain a high degree of personal cleanliness and is to wear suitable, clean and, where necessary, protective clothing.

A2. Compliance regarding cleanliness and behaviour

- Make sure that every person working in a food-handling area maintains a high degree of personal cleanliness.
A2. Good practice

Make sure that everyone, including managers, supervisors, engineers, cleaners, quality control and maintenance staff, working around a plant complies with appropriate personal hygiene procedures wherever they are working.

Visitors and enforcement officials should comply with the same personal hygiene procedures as company staff.

Reminders – display signs and notices (for example, ‘now wash your hands’) in appropriate languages in key areas to remind staff of the company’s rules.

Handwashing – see ‘B. Handwashing facilities’

Personal items – prohibit the wearing of jewellery, including those items worn around the neck and wrist (except plain wedding rings and sleeper earrings), watches, badges, false nails, nail varnish, perfumed hand cream and strong perfume / aftershave, mobile phones or other items that may contaminate the product, in food production areas.

Personal hygiene – prohibit smoking, chewing gum, eating and drinking, except in designated areas (prohibit spitting entirely). Discourage other practices likely to spread contamination (for example, licking fingers, chewing fingernails, scratching) and consider moving staff with heavy coughs and colds to other tasks.

Movement between ‘clean’ and ‘dirty’ areas – if movement between different work areas is necessary it should be from ‘clean’ to ‘dirty’ areas to minimise the risk of cross-contamination, for example, by soiled protective clothing and footwear. Where movement from ‘dirty’ to ‘clean’ is unavoidable, staff should change coats and headgear if necessary, wash or change boots and wash hands. This applies if staff that remove SRM or other by-products are to handle food.

Drinking water – if drinking water is supplied, provide drinking fountains or single-use disposable cups.

A2. Compliance regarding protective clothing suitability

- Make sure that all personnel in food-handling areas wear suitable protective clothing.

A2. Good practice

The main purpose of protective clothing is to protect food from contamination from people. It also keeps people and their clothing clean and dry.

Protective clothing – is taken to mean coats, overalls, gloves, aprons, headgear and footwear, for example, rubber boots or shoe covers.

In food handling areas coats / overalls should completely cover all personal clothing. Headgear should completely contain and cover hair and snoods should cover beards and moustaches. Staff who lift beef quarters, for example, should wear clean protective neck shields, or hooded overalls.

Design - use protective clothing designed to avoid contamination of the product (for example,
coats with press-studs rather than buttons and with no external pockets) and is preferably light coloured so that contamination is easily seen.

### TIP

**Clothing colour** – Staff handling livestock should wear suitably dark clothing to prevent animals being distracted.

**Fit** – protective clothing should fit reasonably well, for example, coats that are too small may not cover outer clothing properly, and clothing or footwear that is the wrong size may limit movement and lead to accidents.

**Quality** - non-disposable protective clothing needs to be made of durable material that is able to stand frequent washing at high temperatures. Disposable protective clothing must be sufficiently robust to afford the required level of protection.

**Defects** – inspect protective clothing regularly for damage or wear and have defective items repaired or replaced when necessary as they could fail to prevent contamination.

### A2. Compliance regarding protective clothing cleanliness

- Make sure that protective clothing worn in food-handling areas is clean.

### A2. Good practice

Protective clothing / headgear / footwear needs to be cleanable or disposable.

All personnel, including visitors should wear clean protective clothing when entering food-handling areas and change that clothing if it becomes excessively soiled and change or wash protective footwear.

### TIP

**Laundering facilities** – Where possible, install apron washers close to workstations to encourage frequent use.

**Dirty tasks** – protective clothing worn in ‘dirty areas’ (for example, a lairage) needs to be clearly differentiated from that worn in food-handling areas. Rubber gloves used for cleaning jobs need to be clearly differentiated from food-handlers gloves so that they are not used for that purpose.

**Colour coding** – this is an effective way of differentiating between clothing / footwear intended for use in different work areas.

**Supplies** – arrange to have adequate supplies of protective clothing available so that staff have clean clothing every day and can change if items become excessively soiled.

**Storage** – store protective items in suitable facilities where they are kept clean and protected from outdoor clothing and other potential sources of contamination.
A2. Compliance regarding additional protective wear

- Make sure that all personnel in food-handling areas wear suitable protective clothing.

A2. Good practice

Make sure that, where worn, other protective items (for example, heavy-duty rubber gloves, chain-mail gloves, wrist guards, visors) are clean and suitable for the intended purpose. They should be clean when first worn, and be cleaned during shifts to remove excessive soiling.

Difficult to clean items, such as chain mail gloves, may be protected in use by covering with a disposable glove. Earplugs should be clean and linked.
B. Handwashing facilities

Legal requirement

853/2004 Annex II Food Premises: Chapter I point 4

B1. The equipment for washing hands used by staff engaged in handling exposed meat must have taps designed to prevent the spread of contamination.

852/2004 Annex II Food Premises: Chapter I point 4

B2. An adequate number of washbasins is to be available, suitably located and designated for cleaning hands. Washbasins for cleaning hands are to be provided with hot and cold running water, materials for cleaning hands and for hygienic drying.

B1. and B2. Compliance regarding facilities

- Provide designated washbasins for cleaning hands.
- Install taps designed to prevent the spread of contamination for use by staff who handle exposed meat.

B1. and B2. Good practice

Where possible, locate hand washing facilities close to tool washing equipment to encourage frequent use.


Legal requirement

852/2004 Annex II Food Premises: Chapter I point 4

B2. An adequate number of washbasins is to be available, suitably located and designated for cleaning hands. Washbasins for cleaning hands are to be provided with hot and cold running water, materials for cleaning hands and for hygienic drying.

B2. Compliance regarding handwashing

- Make sure that hand cleaning and drying materials and hot running water are supplied and
B2. Good practice

Instruct staff in effective hand washing. This includes:

- washing and drying hands thoroughly using an effective procedure
- washing hands at the start of work and on entering a food production area, after a visit to the toilet, after handling waste, after handling dirty equipment or utensils, after a contamination incident and after cleaning
- handwashing should be performed regularly, whether or not gloves are worn
- washing gloves with the same frequency as hands
- changing disposable gloves, if worn, regularly

Cleaning materials – bactericidal soaps and hand sanitising products, such as alcohol-based gels and bactericidal wipes, can be used at handwashing stations. These may reduce microbial contamination on hands but will not compensate for inadequate handwashing.

Nailbrushes – nailbrushes can harbour bacteria and if provided should be replaced or cleaned regularly.

Hand drying – disposable paper towels are recommended (with bins for their disposal) rather than hot air dryers, which can create aerosols that may contaminate surfaces. Where used, launder multiple use fabric towels before re-use.

Barrier creams – food-safe, unperfumed barrier creams to protect the skin may be supplied.

Handwashing/drying facilities - subject to Health & Safety rules, hot air dryers can be used in the toilets and hygiene lobbies
C. Illness

Legal requirement

852/2004 Annex II Personal Hygiene: Chapter VIII point 2

C1. No person suffering from, or being a carrier of a disease likely to be transmitted through food or afflicted, for example, with infected wounds, skin infections, sores or diarrhoea is to be permitted to handle food or enter any food handling area in any capacity if there is any likelihood of direct or indirect contamination. Any person so affected and employed in a food business and who is likely to come into contact with food is to report immediately the illness or symptoms to the food business operator.

C1. Compliance regarding health status

- Do not knowingly allow staff to handle food or to work in food processing areas if suffering from or being a carrier of a foodborne disease or if suffering from, for example, infected wounds, skin infections, sores or diarrhoea.

C1. Good practice

Health declarations – ask prospective employees to complete a pre-employment health questionnaire and sign a declaration stating that there is no medical reason why they should not be permitted to handle food or to work in food processing areas.

An example of a pre-employment questionnaire is provided in ‘Annex 1.’ at the end of this chapter.

Medical examinations – carriers of foodborne disease (for example, Salmonella) may show no symptoms. Examinations may identify health concerns but cannot guarantee to identify such carriers.

Visitors – ask visitors entering food handling areas to sign a health declaration stating that they are not suffering from sickness or a foodborne disease and whether they have recently been abroad.

Foreign travel – travel abroad can increase the likelihood of suffering from gastroenteritis or other foodborne diseases. Staff working in food-handling areas can be asked to complete a brief medical questionnaire on their return to work, and should be excluded if there is reason to think that they are carrying an infection.

Injuries – any non-infected cuts, sores, or abrasions are covered with a waterproof, brightly coloured (preferably metal-detectable) dressing.

C1. Compliance regarding illness

- Instruct staff likely to be in contact with food to report any illness or infection immediately to management, especially any symptoms that are a health risk in a food-handling environment, for example;
- diarrhoea
- vomiting
- fever
- jaundice
- infected boils, cuts or wounds
- discharges from eyes, nose or ears

- Exclude staff reporting or showing these from food handling areas.

### C1. Good practice

Set out clear written instructions (which may need to be provided in appropriate languages) for staff and managers on what they are to do about reporting illnesses or symptoms and possible exclusion from working with or near food until they have been either medically treated and cleared, or have been completely free of symptoms for at least 48 hours. See information on ‘fitness to work’ in the introduction.

**TIP**

Staff illness agreement – You may wish to ask staff to sign an agreement to report illness and close contact with others suffering from these symptoms.

**Exclusion** – local authorities have powers to formally exclude individuals suffering from food poisoning, typhoid, paratyphoid, or dysentery from working with food. Anyone formally excluded in this way cannot return to work before the same authority has given clearance.

**Sickness records** – the health of employees (as far as it may affect food safety) should be monitored and records, such as health declarations, medical certificates and reports of illness, kept to show that the required actions have been followed.
8.4. Official control requirements

Legal requirement

854/2004 Article 4 point 4(d)
Audits by officials of good hygiene practices shall verify that meat plant operators apply personal hygiene procedures continuously and properly.

854/2004 Article 4 point 5
Audits by officials of HACCP-based procedures shall verify that meat plant operators apply such procedures continuously and properly.
Annex 1. Pre-employment questionnaire example

<table>
<thead>
<tr>
<th>Pre-employment questionnaire example</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1.</strong> Have you now, or have you over the last seven days, suffered from diarrhoea and / or vomiting?</td>
</tr>
<tr>
<td><strong>2.</strong> At present, are you suffering from:</td>
</tr>
<tr>
<td>i) skin trouble affecting hands, arms or face?</td>
</tr>
<tr>
<td>ii) boils, styes or septic fingers?</td>
</tr>
<tr>
<td>iii) discharge from eye, ear or gums / mouth?</td>
</tr>
<tr>
<td><strong>3.</strong> Do you suffer from:</td>
</tr>
<tr>
<td>i) recurring skin or ear trouble?</td>
</tr>
<tr>
<td>ii) a recurring bowel disorder?</td>
</tr>
<tr>
<td><strong>4.</strong> Have you ever had, or are you now known to be a carrier of, typhoid or paratyphoid</td>
</tr>
<tr>
<td><strong>5.</strong> In the last 21 days have you been in contact with anyone, at home or abroad, who may have been suffering from typhoid or paratyphoid?</td>
</tr>
</tbody>
</table>

If the answer to any question is ‘yes’ the individual should not be employed as a food handler until medical advice has been obtained.