Environmental Services Department

Cross Contamination Policy

So, maybe you've been running restaurants for twenty years. Or maybe you just graduated from a prestigious culinary school. You know what you're doing. So why did you still get a cross contamination violation?

Maybe it's time to create a cross contamination policy, so you can ensure that your employees know how to effectively protect food from contamination and what to do if something isn't right.

First of all, what is a policy and how do you create a cross contamination policy for your food establishment?

> *A policy is a defined set of actions that minimize food safety risks. Although some small food establishments may have verbal policies, it is best to write your policies down.*

Here are the key steps to consider when developing any policy:

- **Include the key people at the table**

- **Identify the most important steps in your processes**

- **Ensure that your policy includes corrective actions**

- **Revise the policy based on problems that arise, or as your food processes change**

Let's look at each of these steps more closely.

When writing your policy, make sure you are including the key people in your establishment, and also consider which staff members may be involved in each step.

Here are common operations in a kitchen. Where could a cross contamination issue arise in each of these steps?

Receiving

Review how food orders are received in your establishment. Do your receiving procedures keep the food secure? Is the food placed into appropriate storage areas/equipment right away? If you purchase your own food at an offsite location, are you transporting the food in a vehicle that is clean and free of personal items that could contaminate the food.

Storage

Is food protected from other food and chemical during storage? Is food kept covered? Do you store raw meats on lower shelves in proper order according to final cooking temperature requirements? Are chemicals properly stored away from food and utensils/equipment?

Preparation

Review the flow of food preparation in your establishment. How does raw animal food move through your establishment? What pieces of equipment come into contact with this raw food? Are these pieces of equipment also used with read-to-eat (RTE) food? Have you considered using color coded equipment for these food items? Where do employees store their drinks while working?

Assembly

Does your staff use utensils and/or gloves when handling RTE food? Does your staff use hair restraints?

Service to Customers

Is food available for self-service protected by containers and/or sneeze-guards? Are self-service utensils stored with handles out? Do staff handle food containers in a way that minimizes contact with their bare hands?

Ask these questions for each of these operations:

Who is responsible?

Who receives, prepares, assembles, and serves food? Who oversees these processes? Who is responsible for execution?

What needs to happen?

Employees shall store food in clean, covered containers that are protected from contamination by other food, chemicals, and the environment. Raw animal food shall be stored away from RTE food and in an order according to their final cooking temperatures. During preparation, raw animal food must be separated from RTE food. Staff cannot use bare hands to handle

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RTE food. Utensils shall be stored on clean shelves or in clean containers that protect the food contact surfaces. Food available for self-service shall be protected from customer contamination.

When does it take place?

These actions should be followed whenever food is received, placed in storage, prepared, assembled, and/or served to customers.

Where does it occur?

All areas in the kitchen where food is received, stored, prepared, assembled, and served should be reviewed for cleanliness and proper food protection.

How is this achieved?

Food employees should review all food storage areas to ensure they are clean and that food are properly organized. Food preparation and assembly areas should be reviewed to ensure that raw animal food do not directly or indirectly come into contact with RTE food. Effective utensils and/or non-latex gloves should be conveniently stored and used by staff to prevent bare hand contact with RTE food. Food available for customer self-service shall be placed in containers that have self-closing lids or under an effective sneezeguard. Utensils for self-service shall be stored in a container that keeps handles facing outward to avoid contact with the food contact surfaces.

As you review these key operational steps, consider whether it would make sense in your business model to write several policies for cross contamination. For example, you might write separate policies for food storage (e.g. dry storage and walk-in cooler) and food preparation procedures (cutting board usage for raw vs. RTE food).

Now for the corrective actions. This is the "what if…" step. What if something goes wrong? Your policy should state what actions are taken if the correct procedures are not followed. You can include a space for writing in corrective actions on your logs.

But don't stop here! Your cross contamination policy is a living document, and will change over time. When you discover areas of non-compliance in your establishment, use them as opportunities to improve, and return to your policy to incorporate the changes. In this way, you will continue to improve.

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To summarize, here are the key steps to consider with any policy:

- **Include the key people at the table**

- **Identify the most important steps in your processes**

- **Check that your policy answers the questions: who, what, when, where, why and how**

- **Ensure that your policy includes corrective actions**

- **Revise the policy based on problems that arise, or as your food processes change**

Remember, if you don't train your employees on your cross contamination policy, it won't do much to help your establishment. So check out the next document, a Manager's Guide to training your employees.