

# FOOD SAFETY MANAGEMENT SYSTEM CODE OF PRACTICE

## PERSONAL HYGIENE AND HABITS

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# Code of Practice

Food Safety Department

Personal Hygiene and Habits



Commitment to food safety is our culture

## I. Overview

Food handlers are regarded as the main contributor for contamination as they can carry communicable diseases, especially if they themselves have been infected or are in contact with persons or objects that may carry the harmful microbes of those diseases. Additional important sources are those that are common in nasal cavities, mouth and on the skin, and those from the gastrointestinal tract that may enter foods through poor personal hygienic practices. As a result, food handlers may spread these diseases throughout the food establishment if they do not maintain an appropriate level of personal hygiene and avoid habits that may contaminate food.

## II. Purpose

To establish a protocol on effective personal hygiene and habits in areas where open food or clean equipment is handled to avoid the risk of contamination.

## III. Scope

This Code of Practice is applicable to all food handlers (new staff, regular employees, contracted employees), visitors (regulatory inspectors, clients, suppliers, maintenance personnel), and contractors of EKFC East Wing, West Wing, South Wing, CCU, Ruwayyah stores, and F&B Outlets in airports and commercial operations.

## IV. Responsibilities

The Management team is responsible for the approval of resources required to implement this Code of Practice.

The Learning and Development team is responsible for raising awareness and training on personal hygiene and habits of all food handlers at the time of pre-deployment induction program and regular refresher training.

The Human Resource team is responsible for facilitating the pre-employment medical screening, ensuring the staff health fitness prior to deployment to work and implementation of *Food Safety and* hygiene violation guidelines.

Line Managers, Section in-charge or Chef in-charge are responsible for ensuring that all production staff maintain good personal hygiene and habits.

All food handlers (new staff, regular employees, third party service provider), visitors (regulatory inspectors,

clients, suppliers, maintenance personnel), and contractors of EKFC are responsible for complying with good personal hygiene and habits and food safety practices of the catering business.

The Security team is responsible for facilitating the health screening of visitors and contractors through health questionnaire forms.

The Food Safety team is responsible for the verification of compliance of this Code of Practice.

## V. Definition

- 5.1 **Personal Hygiene** – refers to maintaining the body's cleanliness. According to World Health Organization, "hygiene refers to conditions and practices that help to maintain health and prevent the spread of diseases".
- 5.2 **Hygiene Habits** – good hygienic practices that could help prevent the risk of contamination of food especially in food handling areas.
- 5.3 **Food Handler** - any person handling food directly or indirectly in a food establishment, whether packaged or unpackaged food, food equipment and utensils or food contact surfaces.
- 5.4 **Fit to Work** – also known as "fitness to work" is a medical assessment done when an employer wishes to be sure an employee can safely do a specific job or task. The purpose is to determine if medically the employee can perform the job or task under the working conditions.
- 5.5 **Respiratory hygiene**- consists of preventive measures to contain respiratory secretions and reduce the risk of transmitting respiratory infections to others. It aims to limit the spread of droplets containing virus, which are generated when an infected person coughs or sneezes.
- 5.6 **Staff Training** – training provided to staff to increase the knowledge and skill of an employee on safe food handling and good hygienic practices. Training methods include but not limited to classroom training, on the job training, Toolbox talk and e-learning, etc.

## VI. Procedure

### 6.1 Employee Medical Screening

- 6.1.1 All new staff designated as food handlers should undergo medical examination carried out by Dubai Health Authority (DHA). Only upon clearing the mandatory medical screening a food handler should be allowed to start duty within EKFC.
- 6.1.2 All food handlers should secure Occupational Health Card, renewed on a yearly basis, based on screening tests done by Dubai Health Authority.
- 6.1.3 All employees should accomplish FS-COP-PRP-004-FRM-01 upon employment for the agreement to notify future medical status.

- 6.1.4 All food handlers should be instructed to report to their supervisor or line managers and staff clinic if they are suffering from a communicable disease that can contaminate food.
- 6.1.5 Food handlers returning from vacation (at least 21 days from annual leave or leave of absence) should undergo routine medical screening at the staff clinic before duty resumption.
- 6.1.6 Staff on duty suffering from intestinal infection or flu-like symptoms must be excluded from the catering unit and should visit the in-house clinic for medical consultation.

(Refer to FS-COP-PRP-004 Employee Medical Screening for further details)

## 6.2 Visitors and Contractors Screening

- 6.2.1 Visitors who intend to enter food-handling areas should complete a health questionnaire for visitors (FS-COP-PRP-003-FRM-004) prior to entry of the facility.
- 6.2.2 Contractors and regular airline representatives must also sign the agreement to notify document (FS-COP-PRP-003-FRM-04) to report future symptoms and future medical diagnoses of food transmissible diseases.
- 6.2.3 Visitors who confirmed suffering from intestinal infection or flu-like symptoms should not be allowed to enter food-handling areas.
- 6.2.4 Visitors (regulatory inspectors, clients and maintenance personnel) should be given access to food-handling areas on a restricted basis.
- 6.2.5 Visitors should not touch open food or equipment (exception applies for auditors) at any time in production food handling areas. They may however touch or eat food provided at a menu presentation held outside areas where open food is being prepared or handled.

## 6.3 Personal Hygiene

- 6.3.1 Every staff engaged in food handling area should maintain a high degree of personal cleanliness while on duty.
- 6.3.2 Fingernails should be kept short, clean and unvarnished. False fingernails or exposed nail polish should not be permitted.
- 6.3.3 Strong perfume or aftershave should not be worn. This includes perfumed body sprays or deodorants.
- 6.3.4 Make up including body glitter, false eyelashes or jewels should not be allowed in food handling areas. F&B staff should be allowed for light make-up.
- 6.3.5 All employees who work on the shop floor should be clean shaven. In the case of exceptional cases due to medical or other reasons, it should be supported by documented approval from the

respective authorized personnel (e.g. Doctor, Senior Management).

- 6.3.6 Jewelry, which includes but is not limited to wrist watches, bracelets, earrings, necklace, chains, bindi's, etc., should not be worn inside food preparation and handling areas, with the exception of plain wedding bands that are not difficult to clean. However, if an employee or visitor wearing a plain wedding band may come into direct contact with ready-to-eat foods that are not appropriately covered or packaged, they must wear gloves.
- 6.3.7 Personal belongings (cellphones, Bluetooth earphones/ earbuds, wallets) should not be brought inside food handling areas.
- 6.3.8 All cuts and grazes on exposed skin should be covered by a blue (or distinctive colored) waterproof plaster.
- 6.3.9 Staff and visitors entering food preparation areas should wash their hands on hand washing sinks for at least 20 seconds. If the hands are visibly soiled the hands must be lathered in soap for at least 40 seconds. (Refer to FS-COP-PRP-034 Hand Washing).
- 6.3.10 Regular baths and brushing of teeth should be practiced.
- 6.3.11 All employees should not be allowed to bring peanuts and peanut containing products inside EKFC premises.

#### 6.4 Hygiene Habits

- 6.4.1 Good respiratory hygiene practices should be followed at all times (e.g. covering the mouth and nose when coughing or sneezing, either with a bent elbow or by using a disposable tissue). (Refer to FS-COP-MP-009 Communicable Disease Response Program)
- 6.4.2 Smoking (including e-cigarettes), eating and drinking should only be permitted in designated areas. Tasting food with bare hands should not be permitted. (Tasting should be performed using a disposable spoon).
- 6.4.3 Possession, smoking or chewing tobacco in food handling areas or locker rooms should not be permitted.
- 6.4.4 Chewing (gum, sticks, or betel nuts) inside food handling areas should be prohibited.
- 6.4.5 Sitting, lying or standing on any surface liable to come into contact with food should be avoided.
- 6.4.6 Washing face, mouth or spitting in the hand wash basin should not be permitted.
- 6.4.7 Employees should not be allowed to bring personal/ outside food into their work areas, food handling and locker areas. However, admin employees working in offices outside food handling areas are allowed to bring food only with the approval/ Medical certificate.

#### 6.5 Protective Clothing

## 6.5.1 Uniforms

- 6.5.1.1 Suitable company-issued freshly laundered uniforms or protective clothing should be available to the staff on a daily basis and worn by food handlers, management, visitors and contractors working in, or entering any food-handling areas.
- 6.5.1.2 Company issued protective clothing must be worn by visitors and contractors working in or entering the food handling areas.
- 6.5.1.3 There should be a visible distinction in work wear between staff working in different areas of the facility (e.g., raw food handlers from CCU- Butchery should be identified by separate uniform for employees working at Hot Kitchen, Cold Kitchen, Fight Preparation and Dispatch areas).
- 6.5.1.4 Freshly laundered and clean uniforms should be worn at the start of the shift and maintained in a serviceable condition.
- 6.5.1.5 The white coats should not be worn in the canteen, toilets, smoking areas and outside the areas of direct food handling (whenever possible).
- 6.5.1.6 Wearing of white coat beyond the catering and commercial operational areas should not be permitted (ex. meeting rooms, offices, exterior premises).
- 6.5.1.7 Excessively soiled uniforms should be changed or replaced when they present a product contamination risk.
- 6.5.1.8 A designated area for returned soiled clothing should be available.
- 6.5.1.9 Used uniforms must be collected and laundered at Linen craft. All clothing must be free from stain, damage or excessive wear.
- 6.5.1.10 F&B Concourse D British Airways production staff uses two sets of uniform specifically,
  - A laundered general DIA labeled chef uniform (to be worn and used only during transit from EKFC East wing uniform counter to Concourse D),
  - A laundered staff specific production uniform (to be carried along with the staff during transit and changed at Concourse D lounge before entering British Airways production area).

## 6.5.2 High Visibility Vest, Chiller and Freezer Jackets

- 6.5.2.1 High visibility or reflective vests used in open food handling areas should be laundered on a daily basis.
- 6.5.2.2 Thermal jackets used in the open food handling area should be replaced and laundered on a daily basis.

6.5.2.3 Freezer jackets can be re-used provided they are replaced whenever soiled or pose a risk of contamination. A frequency of washing of freezer jackets should be established by concerned department.

### 6.5.3 Hair Coverings

6.5.3.1 All employees, visitors, contractors or management entering food handling areas should wear hair covering or hairnets. Long hair should be tied back neatly before wearing hairnets.

6.5.3.2 All hair (including beards, moustaches, neck hairs and sideburns) should be fully contained using a closely weaved hairnet or beard cover to prevent product contamination or foreign objects.

6.5.3.3 F&B staff working in DIA outlets, who are assigned in the service area, need not wear hairnets. However, hairnets should be worn by staff entering or working inside the kitchen area.

6.5.3.4 Hairnets should be put on first before wearing the kitchen coats at the start of the shift and uncovering of hair should be done last after kitchen coats have been removed at the end of duty to minimize hair contamination on product and food contact surface.

6.5.3.5 Hairnet should not be removed during the breaks or in between the shift and should be used till the end of the shift to prevent any hair fall on uniform. Replace it with new hairnet, if dirty or damaged.

6.5.3.6 Hair clips, fancy hair pins or other materials that can result in contamination should not be permitted.

### 6.5.4 Hand gloves, Plastic Sleeves and Aprons

6.5.4.1 Gloves should be made from materials suitable for food contact and should be maintained in clean and hygienic conditions.

6.5.4.2 All employees handling finished and ready-to-eat product should use disposable hand gloves and plastic sleeves. All food handlers involved in dishing or assembly should use portioning tools or utensils such as tongs, spoons, spatula, etc.

6.5.4.3 All food handlers should wash hands prior using of disposable hand gloves.

6.5.4.4 Disposable gloves, plastic sleeves or aprons if worn, should be checked regularly for damage or puncture and replaced as required. (Refer to FS-COP-PRP-041 Disposable Gloves Handling)

6.5.4.5 Disposable gloves and aprons should be changed after each break, upon re-entry into the processing area, after coughing or sneezing, when changing tasks, products or when contaminated or damaged. Non-disposable aprons should be cleaned and stored on racks provided in the processing area when not in use and not on packaging, ingredients, product

or equipment.

6.5.4.6 Aprons must not be worn in smoking areas, canteen and toilet areas. Chef's whites must not be worn outside of the catering units. However, this is tolerated when the Chefs are proceeding for events and outdoor catering in company vehicles. All precautions should be made to ensure that the food and food contact surface are not contaminated from the protective clothing.

6.5.4.7 Non-disposable aprons should not be washed or dried in food handling or preparation areas.

*6.5.4.8 If necessary, disposable surgical masks should be worn (Refer to FS-COP-MP-009 Communicable Disease Response Program for details on use of face masks)*

### 6.5.5 Footwear

6.5.5.1 Suitable footwear (enclosed toes, low heel, and non-slip) should be worn within food handling environment. Ideally, safety shoes are provided by, and captive to the catering unit, or suitable sanitizing mats or shoe sole washer provided before entering open food handling areas.

6.5.5.2 Visitors or contractors may wear their own footwear, however, suitable means to reduce the risk of contamination should be followed (e.g., sanitizing mats, boots scrubbers, hard wearing non-slip shoe covers).

*6.5.5.3 It is not recommended for the staff working in production to wear the safety shoes outside the building to prevent risk of contamination.*

## 6.6 Staff Facilities

6.6.1 Staff facilities must be designed such that food safety is not compromised. It should be cleaned and pest treated on a set frequency.

6.6.2 Changing facilities must be provided for employees or site visitors to change into uniforms, prior to entering food handling areas.

6.6.3 Food should not be stored in employee personal lockers. Food and beverage from cafeteria should not be taken to the locker areas.

6.6.4 Outdoor clothing and personal items must be stored separately from uniforms.

6.6.5 Toilets must not open directly into the food handling or storage areas.

6.6.6 Designated smoking areas if provided must be located external to the catering kitchen and food storage areas.

6.6.7 Changing rooms, lockers, toilets, sinks, soap dispensers and hand drying devices are clean and well maintained.

6.6.8 Each toilet, changing room and locker should have sufficient supply of water, toilet paper, soap, single use towels or hand drying devices.

6.6.9 Toilets, hand drying devices, lockers and all other devices should be fully functional.

6.6.10 Clothes and shoes should be stored neatly and not on top of lockers.

## 6.7 Staff Training

6.7.1 All new staff, including temporary or contracted employees, must receive an induction that includes food safety and hygiene training before entering the food handling areas by a recognized food safety standard e.g. Level 2 Food Safety prior to deployment of food handlers in the respective business units.

6.7.2 All employees must be adequately trained, instructed and supervised commensurate with their activity.

6.7.3 Adequate, relevant and refresher training on personal hygiene and habits should be given to all food handling personnel every 12 months. The training should include a description of personnel illnesses or states of health that may affect the safety of the food product, and of which the management should be informed.

6.7.4 All supervising or managerial staff responsible for food handling areas and operatives must receive food safety training at a higher level (e.g., Level 3 Food Safety training or equivalent) after securing their Level 2 certification.

6.7.5 All visitors should be trained in the site's food safety and hygiene procedures before entering any food processing or handling areas or should be escorted at all times in food processing, handling and storage areas.

## 6.8 Food Safety and Hygiene Management Guidelines

Behavioral guidelines have been categorized in accordance with the degree of risk as shown below:

### 6.8.1 Risk of Classification of Non-conformance

RISK OF NON-CONFORMANCE	FOOD SAFETY AND HYGIENE VIOLATION
<b>High Risk</b> - An activity where the likelihood of an adverse event or the severity of the adverse event or both are high.	<ul style="list-style-type: none"><li>• Changing Date / Day code labels of food products extending shelf life of outdated product</li><li>• Possession, Smoking / Chewing Tobacco in food handling areas or locker rooms</li><li>• Fraudulent record keeping/submitting false testimonial</li><li>• Intentional / deliberate contamination in food products or equipment</li></ul>

<p><b>Medium Risk</b>  - An activity where the likelihood of an adverse event or the severity of the adverse event or both are moderate</p>	<ul style="list-style-type: none"> <li>• Subsequent hand swab test failure for pathogenic bacteria</li> <li>• Failure to carry out hand washing/ not following the correct steps for hand washing</li> <li>• Bad food handling practice</li> <li>• Not wearing gloves when handling final product including cleaned equipment</li> <li>• Eating and drinking in food handling areas (tasting food with a food tasting spoon is allowed)</li> <li>• Improper segregation of Raw &amp; Cooked items</li> <li>• Incorrectly stored chemicals</li> <li>• Tasting food using your fingers or re-using food from the floor</li> <li>• Food handlers working with an infectious disease or open wound</li> <li>• Subsequent non-compliance with wearing protective clothing</li> <li>• Washing face, mouth or spitting in the hand wash basin</li> <li>• Sanitizing fruit and vegetables at zero/below the required chlorine concentration</li> <li>• Bad hygiene habits</li> <li>• Spitting anywhere inside food handling areas</li> <li>• Protective clothing / uniforms are left in the toilet</li> <li>• Not washing hands when replacing worn gloves with new ones</li> <li>• Bringing personal belongings into food handling areas</li> <li>• Failure to wear protective clothing correctly (including improper use of gloves)</li> <li>• Incorrect use of chopping boards or other kitchen equipment</li> <li>• Transportation of uncovered food items in a tray/trolley/container from one section to another</li> <li>• Storing of food or cleaned equipment directly on the floor without using dollies/trolleys</li> </ul>
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<p><b>Low Risk</b> - An activity where the likelihood of an adverse event or the severity of the adverse event or both are low</p>	<ul style="list-style-type: none"> <li>• Coming on duty unshaven</li> <li>• Dirty uniforms or not wearing protective clothing</li> <li>• Wearing aprons in the staff canteen/smoking area/ toilet</li> <li>• Use of Bindi at work</li> <li>• Having long nails or nail varnish, false nails etc</li> <li>• Hair showing below hairnet</li> <li>• Strong smelling perfumes</li> <li>• Kicking or moving equipment using only your feet</li> <li>• Long hair not tied back prior to wearing the hairnet</li> <li>• Wearing jewelry in food handling areas ( Jewelry includes, but not limited to wrist watches, earrings, strings, beads, bracelet)</li> <li>• Using cellphones, Bluetooth earphones/ earbuds, wallets in production area</li> <li>• Wearing thread on the wrist</li> <li>• Stepping on the food pallets</li> <li>• Dirty uniforms found on the floor in changing areas</li> <li>• Wearing ornated hair clips and pins</li> <li>• Wearing false eyelashes</li> </ul>
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### 6.8.2 Matrix of Recommendations

Breaches of	High Risk	Medium Risk	Low Risk
1st Offense	Discussion with Human Resources and Line Manager. - <b>Termination.</b> Outcome issued by HR.	Discussion with Line Manager - <b>Final written warning</b> and Behavioral Contract. Outcome issued by Department.	Discussion with Line Manager- <b>First written Warning</b> and Behavioral Contract. Outcome issued by Department.
2nd Offense		Discussion with Line Manager. <b>Termination</b> Outcome issued by HR.	Discussion with Line Manager. <b>Final Written Warning.</b> Outcome issued by Department.

3rd Offense			Discussion with Human Resources and Line Manager. Termination. Outcome issued by HR.
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**Note:** Should an employee be subjected to a discussion with their line manager and Human Resources, the outcome of the discussion is to determine the continuation of employment.

## 6.9 Verification

- 6.9.1 Daily personal hygiene checks should be conducted by Food Safety Assistants on different food handling areas using FS-COP-PRP-003-FRM-001. Personal Hygiene Checklist in Hygiene Management (HMS) software.
- 6.9.2 The Food Safety Assistant or Senior Food Safety Assistants should randomly verify the compliance with this Code of Practice.
- 6.9.3 Food Safety Specialists/ Microbiologist should verify the effectiveness of hand washing through microbiological hand swabbing according to sampling plan (ML-REF-029).
- 6.9.4 The non-compliance observed on this procedure should be reported through electronic from Food Safety Spot Checks Report in Hygiene Management (HMS) software. *Food Safety Violation Notification (FSVN)* should be issued to non-compliant personnel.
- 6.9.5 Effectiveness of training should be evaluated. Records should be available.
- 6.9.6 Trends on personal hygiene and habits deviation should be collated by Learning and Development team for training needs analysis.

## 6.10 Correction and Corrective Action

- 6.10.1 Whenever deviations on personal hygiene and habits are reported, the corresponding recommendations on food safety and hygiene guidelines should be applied for non-compliances to the personal hygiene and habits requirements by the respective line manager or HR staff. Evidence of action taken should be communicated with Food Safety department.
- 6.10.2 The concerned department and or food handlers should be responsible for closing out deviations of personal hygiene and habits.

## VII. Documents

- 7.1 FS-COP-PRP-003-FRM-01 Personal Hygiene Inspection Checklist
- 7.2 FS-COP-PRP-003-FRM-04 Visitors, Contractors, Airline rep. Health Questionnaire

- 7.3 FS-COP-PRP-004-FRM-01 Agreement to notify Health status for Emirates Flight Catering Employee
- 7.4 Occupational Health Cards
- 7.5 HR Training Records
- 7.6 Training Evaluation Records
- 7.7 Fit to Work Records
- 7.8 FS-COP-MP-001-FRM-01 Food Safety Spot Checks Report
- 7.9 ML-REF-029 Sampling Plan
- 7.10 ML-FRM-022 Microbiological Analysis Report
- 7.11 Microbiological Hand Swab Test Results
- 7.12 FS-COP-PRP-003-REF-01 Management Guidelines- Food Safety and Hygiene.

**VIII. References**

- 8.1 British Airways, Global Technical Standards for Inflight Caterers and Airport Lounges, Version 1.2, 12 April 2023.
- 8.2 Dubai Municipality Food Code 2.0, Final Draft 12 July 2023.
- 8.3 IFSA World Food Safety Guidelines for Airlines Catering, Version 5, 2022
- 8.4 ISO TS 22002-2. First Edition 2013-01-15. Prerequisite Programmes on Food Safety – Part 2: Catering
- 8.5 QSAI Catering Quality Assurance Programme, Food Processing Safety and Interpretation Guidelines, Version 10.0, 01 Jan 2019
- 8.6 World Health Organization (WHO).
- 8.7 FS-COP-PRP-004 Employee Medical Screening
- 8.8 FS-COP-PRP-034 Hand Washing
- 8.9 FS-COP-PRP-041 Disposable Gloves Handling
- 8.10 FS-COP-MP-009 Communicable Disease Response Program
- 8.11 Canadian Food Inspection Agency. Reference Database for Hazard Identification, 2008

**IX. Attachments**

Nil

**X. Document Control**

This is a controlled document. The copy of this document is issued according to the distribution list in FSSC 22000 Masterlist of Controlled Documents (MCD).

**XI. Appendix**

**11.1 Hazard Identification and Risk Analysis**

SN	HAZARD TYPE	HAZARD IDENTIFIED	RISK IMPACT
1	Microbiological	Contamination of pathogens	Pathogen contamination due to improper washing of hands and wearing of

			appropriate PPE
2	Physical	Contamination of foreign materials	Contamination of foreign materials due to poor personal hygiene and habits (e.g., jewelry, personal items, etc.)
3	Chemical	Chemical contamination	Contamination of chemicals in food and food contact materials due to poor handling
4	Allergen	Allergens	Allergen contamination due to improper handling and storage