

Standard 3.2.2A – Food Safety Management Tools Children’s Services Guideline

Recent changes to the Food Standards Code introduced new food safety requirements for children’s services that provide food as part of their operation.

The changes apply from 8 December 2023 and affect services that provide food – specifically unpackaged, ready-to-eat food that requires temperature control.

The requirements **do not** apply to children’s services handling food supplied by parents or supplying only packaged food. They also do not apply to not-for-profits and charities that provide food for fundraising at one-off or occasional events, or free to the community.

The requirements

Standard 3.2.2A of the Australia New Zealand Food Standards Code introduces 3 mandatory food safety management tools for food businesses, depending on their food handling activities:

 <p>1. Food Safety Supervisor</p> <p>A business must have a Food Safety Supervisor who:</p> <ul style="list-style-type: none"> • is qualified • can give advice to employees who handle food • is reasonably available. 	 <p>2. Food handler training</p> <p>Food handlers must do a food safety training course or show that they understand:</p> <ul style="list-style-type: none"> • safe handling of food • food contamination • cleaning and sanitising equipment • personal hygiene. 	 <p>3. Showing food is safe</p> <p>A business must be able to show their food is safe by:</p> <ul style="list-style-type: none"> • keeping a record of important food safety controls, activities and processes; or • demonstrating safe food handling practices.
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Children’s services and family day care facilities that provide food as part of their operation are considered food businesses. In NSW, local councils inspect most retail food businesses, including childcare and family day care, under the Food Regulation Partnership with the NSW Food Authority.

The Food Authority is encouraging councils to initially take an educative approach while businesses adjust to the new requirements.



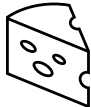





Who the requirements apply to

The Standard applies to any service or business that sells or serves food that is:

- not sold or served in its original package
- potentially hazardous (requires temperature control), and
- ready-to-eat.

Potentially hazardous foods have certain characteristics that support the growth of bacteria, or the production of toxins, and must be kept at 5°C or colder, or 60°C or hotter, to stay safe to eat.

Examples of potentially hazardous, ready-to-eat food include:

 <p>Cooked meat and poultry Examples: Deli meat, burgers, curries, kebabs, pâté, meat pies</p>	 <p>Foods containing eggs, beans and nuts Examples: Quiche, aioli, mayonnaise, mousses, tofu</p>	 <p>Dairy products and foods containing dairy Examples: Milk, dairy desserts, fresh cream, custard, cheese</p>	 <p>Cooked rice and pasta Examples: Fried rice, plain rice, spaghetti, carbonara, lasagne</p>
 <p>Seafood and foods containing seafood Examples: Sushi, prawns, fish, mussels, oysters, shellfish</p>	 <p>Sprouted seeds Examples: Alfalfa sprouts, clover sprouts, chickpea sprouts</p>	 <p>Cut fruits and vegetables Examples: Cut melon, salads, pre-cut fruit trays</p>	 <p>Foods containing any of these foods Examples: Sandwiches, pizzas, rice rolls.</p>

Categories under the Standard

Standard 3.2.2A classifies businesses into 2 categories, depending on their activities.

Category one businesses

Category one businesses **process** potentially hazardous food into a food that is ready-to-eat **and** potentially hazardous and serve it to consumers. Processing means chopping, cooking, drying, fermenting, heating, thawing and washing, or a combination of these.

Category one businesses must implement all 3 tools:

- have a qualified onsite Food Safety Supervisor
- ensure all food handlers are trained in food safety and hygiene, or can demonstrate adequate skills and knowledge, and
- be able to show their food is safe.

Examples of category one children’s services include:

- A long daycare centre that serves meals they have made onsite to children, including sandwiches, cooked meat, rice and pasta and snacks including cheese, buttered rice cakes and yoghurt served in a bowl.
- A family day care provider who buys food and prepares meals containing potentially hazardous ingredients that are served to children.
- An after school care premises that makes and serves cooked afternoon tea containing potentially hazardous ingredients, or any refrigerated food that is removed from its packaging before serving to children.
- A before school care service that serves cereal with fresh milk from the fridge, toast with butter, and/or cut fruit. Please note: The Standard does **not apply** to a free breakfast club where there is no fee involved for the food, which are often run by charities or schools.

Category two businesses

Category two businesses serve unpackaged, potentially hazardous, ready-to-eat food they have not made themselves. The business might remove packaging before serving, or receive the food unpackaged (for example, from a caterer). These businesses only slice, weigh, repack, reheat or hot-hold the food, but do not process it in any other way.

Category two businesses must implement tools 1 and 2 in the Standard:

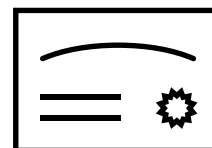
- have a qualified onsite Food Safety Supervisor
- ensure all food handlers are trained in food safety and hygiene or can demonstrate adequate skills and knowledge.

Examples of category two children’s services include:

- A childcare centre receives meals in bulk from a supplier and only reheats them before serving.
- A family day care provider supplies, prepares and serves snacks to children where the preparation only involves slicing or portioning, such as sliced fruit, sliced cheese, yoghurt in a bowl, or fresh milk poured into a cup.

Tool 1 – Food Safety Supervisor

Food Safety Supervisors (FSS) oversee day-to-day food handling operations and ensure risks are managed. They must be certified within the past 5 years and have skills and knowledge in food safety, especially around high-risk foods.



NSW and Australian food laws require certain businesses in the hospitality and retail food service sector to appoint at least one trained FSS per business premises.

Appointing an FSS gives food businesses a better level of onsite protection for food safety.

How to become a Food Safety Supervisor

Training is delivered by approved Registered Training Organisations (RTOs). There are 2 learning pathways to achieve FSS certification – hospitality and retail. Children’s services staff can qualify to be an FSS through either pathway.

Training is delivered online, face-to-face, in the workplace, or a combination, and can generally be completed in one full day. Course costs are set by individual RTOs and range from \$99 to \$200.

Certification is valid for 5 years, after which a food service business has 30 working days to ensure their appointed FSS completes recertification training with an approved RTO.

Who should be the Food Safety Supervisor

Services nominate their own Food Safety Supervisor – they must have the authority and ability to manage and give direction on the safe handling of food. It may be the owner, manager, or an employee (such as kitchen staff). In the case of family day care services that provide meals, it would be most appropriate for the educator to undergo certification.

The FSS must be ‘reasonably available’ as a point of contact for food handlers and authorised officers. ‘Reasonably available’ means they work onsite and oversee food handling of high-risk unpackaged foods and can be easily contacted by phone.

Larger childcare centres may choose to certify more than one FSS to cover shift work and leave.

Steps to complying with the Food Safety Supervisor requirement

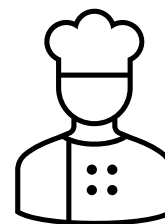
1. Choose who will be the FSS for your business.
2. The chosen FSS completes the training and assessment through an approved RTO.
3. The FSS receives a Statement of Attainment and a NSW FSS certificate. A copy must be kept on the premises.
4. After 5 years, the FSS completes recertification training and assessment for an updated NSW FSS certificate and an updated Statement of Attainment for the required units of competency.

More information is available on the Food Authority website:

- [Food Safety Supervisors](#)
- [Approved training providers](#)
- [Guideline to Food Safety Supervisor requirements](#) (pdf 555KB)

Tool 2 – Food handler training

Under the Standard, all staff who handle unpackaged, potentially hazardous food must have completed a food safety training course or have appropriate skills and knowledge. This is an addition to the Food Safety Supervisor requirement.



Food handling may include the preparation of food as well as serving it to children and even cleaning food contact surfaces, such as preparation areas, utensils and equipment. Businesses can choose how food handlers are trained, but it must cover:

- safe handling of food – including temperature control measures for potentially hazardous food and understanding the temperature danger zone
- food contamination – including strategies to keep raw and cooked food separate, allergen management, food storage, and use of separate utensils and chopping boards
- cleaning and sanitising of food premises and equipment – including correct procedures for cleaning then sanitising, using food-safe chemicals, and/or using heat as a sanitiser
- personal hygiene – including obligations for sick employees, handwashing, uniforms and grooming of hair, nails and skin.

Services may use free online food safety training programs, courses from vocational training providers or internal training tailored to suit their own procedures.

Additional training may not be needed if food handlers already have adequate skills and knowledge in the above areas. A business can recognise a food handler’s prior learning and experience in the food industry, as long as it is relevant and current to the activities they do.

Free training available

The NSW Food Authority’s free online Food Handler Basics training course can help services meet the new food handler training obligations under the Food Standards Code.

The interactive short course covers the basic knowledge required under Standard 3.2.2A. It is not the same as Food Safety Supervisor training, which is delivered by certified registered training organisations.

- [Access Food Handler Basics training](#)

Steps to complying with the food handler training requirement

1. Check whether your food handlers have an adequate understanding of the above topics. You may wish to refer to the following factsheets:
 - a. [Cleaning and sanitising for businesses](#)
 - b. [Health and hygiene requirements for food handlers](#)
 - c. [The 2-hour/4-hour rule](#)
 - d. [Keep food separate](#)
 - e. [Temperature control of potentially hazardous foods](#)
 - f. [Allergy aware checklist](#)
2. Set aside at least 1 hour for each food handler who requires training to complete the Food Authority’s free Food Handler Basics course, or develop and deliver in-house training.
3. Keeping a record of training food handlers have completed, which can be shown to authorised officers on request, is recommended.

Tool 3 – Showing your food is safe

Children’s services that do more than just slice, weigh, repack, reheat or hot-hold potentially hazardous food, must also be able to demonstrate safe food practices.

This is to ensure businesses are actively monitoring and managing key food safety risks related to food temperature control, food processing, and cleaning and sanitising, which are critical for food safety.



Services can meet this requirement by keeping records, and/or demonstrating safe food practices.

What needs to be shown?

Specific activities must be monitored and recorded, including:

- temperature control during food receipt
- storage
- display
- transport
- pathogen reduction during food processing
- minimising time during food processing
- cooling food
- reheating food
- cleaning and sanitising.

Keeping records

‘Records’ are documents or objects kept for the information they contain, or can be obtained from them. Examples include writing on invoices or templates, photos or footage, data logger information, and verified written instructions, such as a validated recipe or standard operating procedure (SOP).

Records should include the date (and time, if appropriate) and the food or activity it relates to. Records should be made each day the business handles unpackaged potentially hazardous food, unless it can be shown in another way requirements are being met. Once made, records must be kept for 3 months.

Free children’s services template available

The Food Authority’s voluntary Food Safety Program template for children’s services can help businesses meet their obligations under Standard 3.2.2A. It includes a range of advice and templates tailored to the sector that can be adapted to reflect each service’s food handling activities.

- [PDF version](#) (383KB)
- [Word version](#)

Steps to complying with the showing food is safe requirement

- Keep records of important food safety information, including how you have safely received, stored, processed, displayed, and transported potentially hazardous food, and cleaned and sanitised, **or**
- Have a written instruction sheet or standard operating procedure that is followed by staff for each of the activities above (see the Food Authority’s Food Safety Program template for guidance), **or**
- Ensure staff are capable of demonstrating safe food handling practices and processes to an authorised officer.

More information, including templates for record keeping, is available on the Food Authority website:

- [Standard 3.2.2A – showing food is safe](#)
- [Changes for children’s services](#)

More information

- Visit foodauthority.nsw.gov.au/safetytools
- Phone the Food Authority helpline on 1300 552 406
- Email food.contact@dpi.nsw.gov.au

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