

OFFSHORE MAJOR ACCIDENT REGULATOR



Offshore Petroleum Regulator
for Environment & Decommissioning



The Offshore Food Hygiene Inspection Guide

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OMAR Inspectors / ED Offshore Inspectors / ED Specialist Inspectors

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Summary

This guidance outlines an approach to inspection of dutyholders arrangements for managing health risks offshore associated with food hygiene. It also sets out criteria for satisfactory and unsatisfactory performance factors against which the dutyholder performance will be rated for each of these areas. References are made to technical standards and guidance that inspectors will use to form opinion for legal compliance. The effectiveness of such systems is a key component of occupational health risk management and securing effective control of health risks to prevent or minimise the incidence of occupational diseases such as food borne infections.

Introduction

The aim of this Inspection Guide (IG) is to provide information and guidance to OMAR inspectors to support the delivery of consistent and effective food hygiene safety management. It does this by highlighting current key areas to be covered during inspections, providing a framework for inspectors to judge compliance, assign performance ratings, and decide what enforcement action to take should they find legislative breaches. In doing so, it complements HSE's Enforcement Policy Statement (EPS) and Enforcement Management Model (EMM).

The operational guidance outlines HSE's priorities for inspection of food hygiene health risks offshore. It is important to note that this guidance does not include detailed information on other offshore health risks such as Hazardous Substances, Noise, Vibration, Asbestos, Ergonomics/Manual Handling, Ionising and Non-Ionising Radiations, Thermal Environment, Personal Protective Equipment, Potable Water, First-Aid and Welfare, which continue to form part of the remit of the ED Industrial Hygiene Team.

Relevant Legislation

Health and Safety at Work etc Act 1974, Section 2(1) –

It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees.

Health and Safety at Work etc Act 1974, Section 3(1) –

It shall be the duty of every employer to conduct his undertaking in such a way as to ensure, so far as is reasonably practicable, that persons not in his employment who may be affected thereby are not thereby exposed to risks to their health or safety.

The Management of Health and Safety at Work Regulations 1999, Regulation 3 –

Requires every employer shall make a suitable and sufficient assessment of the risks to the health and safety of his employees to which they are exposed whilst they are at work; and the risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking.

The Management of Health and Safety at Work Regulations 1999, Regulation 5 –

Requires employers make and give effect to such arrangements as are appropriate, having regard to the nature of his activities and the size of his undertaking, for the effective planning, organisation, control, monitoring and review of the preventive and protective measures.

The Offshore Installations (Offshore Safety Directive) (Safety Case etc) Regulations 2015, Regulation 16 –

Requires a dutyholder who prepares a safety case pursuant to these Regulations demonstrate that the dutyholders management system is adequate to ensure that the relevant statutory provisions will, in respect of matters within the dutyholders control, be complied with.

Offshore Installations and Wells (Design and Construction etc.) Regulations 1996, Regulation 12 and specifically Schedule 1 –

Requires dutyholders ensure that the additional requirements set out in Schedule 1 are complied with in relation to an installation, while it is in use, unless in the case of any such requirement it would not prejudice the health, safety or welfare of any person if it were not complied with.

The Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995 Regulation 17 –

Requires dutyholders ensure that an adequate supply of clean, wholesome drinking water is available at suitable locations on the offshore installation and such locations are clearly marked to show that drinking water is there.

The Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995 Regulation 18 –

The dutyholder shall ensure that all provisions for consumption by persons on the offshore installation are fit for human consumption, palatable and of good quality. The provision of drinking water and food offshore is regulated by Regulations 17 and 18 of the Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995 (MAR). Regulation 12, Schedule 1, of the Offshore Installations and Wells (Design and Construction, Etc.) Regulations 1996 (DCR) is also applicable, for example in relation to construction of premises, ease of cleaning of surfaces etc. Onshore legislation (including The Food Safety Act 1990 (as amended), the various national (England, Scotland, Wales and Northern Ireland) Food Hygiene Regulations 2006, and the various water supply and quality Regulations) does not apply offshore. However, the standards required by onshore legislation and guidance are the minimum that would be expected under MAR. The current Food Hygiene Regulations do not contain the same level of detail as those that have been revoked, so an industry standard Guidelines for Environmental Health for Offshore Installations OEUK has been published. Reference should also be made to other appropriate governmental and industry guides to Good Hygiene Practice, Food Safety Management and Hazard Assessment Critical Control Points; particularly guidance produced by the Food Standards Agency (FSA).

Action

Inspectors should review relevant documentation outlined within the IG prior to the installation visit and test compliance during the installation visit against the “Success Criteria” given in Appendix 1.

Inspection of this topic should include both inspection of the priority areas as well as an inspection of the overall policy, procedures and organisation for managing occupational health risks to establish a consistent and complete coverage of the topic. In inspecting individual topic areas, it may be necessary to have input from the relevant specialist inspectors where there are technical issues beyond the competence of the IMT inspector.

Food - The dutyholder is required to have a food safety management system in place with appropriate organisational arrangements to ensure the management, control and monitoring of all aspects of food safety and hygiene. This should be based on a detailed Hazard Analysis Critical Control Point (HACCP) assessments to identify specific biological, chemical or physical hazards that adversely affect the safety of the food and specify control measures. The offshore caterer

whether internal or an external contractor should be able to demonstrate that they have an adequate food safety management system in place to ensure that food is fit for human consumption, palatable and of good quality. The provisions in place for food, drink and water; should be nutritious, wholesome and safe to eat or drink. Arrangements should ensure that provisions meet these criteria when supplied and that they continue to do so while stored on the installation.

By the conclusion of the inspection, it should be possible to:

- Have undertaken a targeted proactive inspection of the food hygiene management system
- investigate concerns associated with food hygiene
- decide whether the measures in place were adequate to control the risk of exposure; and take any necessary enforcement action where these are deemed inadequate

When carrying out inspections covered by this IG inspectors should:

- Assess dutyholder responses against the success criteria in Appendix 2
- Use the performance descriptors in Appendix 1 and 2 to:
 - Determine the appropriate performance rating
 - The Initial Enforcement Expectation (IEE)
 - Consider how and when the issues raised during an inspection are to be closed out

Background

The aim of Industrial Hygiene is to prevent or control exposure to health risks by recognising health hazards, evaluating the risk and establishing appropriate control measures. The occupational health hazards may include;

- Physical agents (e.g., noise, vibration, radiation)
- Hazardous substances (e.g., chemicals, asbestos)
- Biological agents (e.g., Legionella, food hygiene)
- Ergonomics/Manual Handling

The essential requirements for managing occupational health are the same as those for any management system. Any sub-system for managing occupational health risks should therefore have the key features of an adequate management system i.e., policy, organisation, planning and setting standards, performance measures and auditing and review. Confirmation should be obtained that a recognised code, standard or body of guidance has been considered in determining the required performance of the occupational health management system.

Other Relevant Inspection Guides

The Offshore Health Risk Management Inspection Guide

The Offshore Control of Substances Hazardous to Health (COSHH) Inspection Guide

The Offshore Water Management Inspection Guide

Specialist Advice

Specialist advice should be sought from ED Industrial Hygiene Team in circumstances when considering enforcement / debate over relevant standards on any aspects of food hygiene.

Organisation

Targeting

Inspections should be planned to ensure that the necessary site personnel are available, and arrangements can be made to facilitate physical inspection of the system(s).

Timing

Inspectors should undertake Inspections as part of the agreed Intervention Plan or as determined by the Energy Division Senior Leadership Team (EDSLT).

Resources

Further guidance can be sought from:

Occupational health risks offshore - HSE

Food Safety- HSE

Offshore COSHH essentials OFE1 - Food safety and hygiene

A guide to the Offshore Installations and Pipeline Works (Management and Administration)

Regulations 1995 - HSE

Guidelines for Environmental Health for Offshore Installations - Issue 2 - OEUK

Recording & Reporting

The dutyholder performance ratings should be entered on the Inspection Rating (IRF) Tab of the relevant installation Intervention Plan Service Order. Findings should be recorded in the post inspection report and letter.

Health and Safety

When conducting an inspection, the principles for mitigating the risk to staff are as follows: -

Sound training for the recognition and identification of risks.

Understanding of roles and responsibilities.

Planning and conducting site visits in accordance with HSE procedures.

Inspectors undertaking inspections must be suitably trained and competent. The aim is to avoid the risk of exposure by carrying out your duties without entering areas where exposure to physical hazards may occur. If you are in any doubt about the hazards you face or whether control measures are adequate to safeguard your own health and safety, you should withdraw from the area and seek advice from your line manager or an experienced colleague.

Appendix 1 – Plan, Do, Check, Act for Food Hygiene

PLAN

1. Is there a food safety hygiene management system in place?
2. Is there a site-specific HACCP (hazard analysis critical control point) document, which includes specifying who is responsible for what aspect of food safety?
3. Has the HACCP been completed by a competent person i.e. suitable training and experience in undertaking HACCP?
4. Have appointed competent persons and those who are appointed to carry out the role of food focal points (food competent person, or similar) been suitably informed, instructed and trained by an accredited food hygiene course?
5. Is there a system in place for preventive and reactive maintenance of work equipment?
6. Are provisions in place for the adequate supply of clean, wholesome drinking water? Are they available at suitable locations on the offshore installation? Are such locations clearly marked to show that drinking water is there?
7. Is there a clear indication given as to which outlets provide drinking water and which do not?
8. Is there a contingency plan that covers failure of refrigeration or other service equipment?
9. Is there a contingency plan to cover an outbreak of food poisoning?
10. Is there a contingency plan for food safety which covers the event of an outage in the potable water supply? This could be in the event of water shortage or contamination by chemicals/bacteria.
11. Have arrangements for separate accommodation been provided for catering staff?

**DO, CHECK and
ACT**

Facilities

1. Are the galley facilities of a sufficient size to cater for all persons on board?
2. Is the kitchen and galley in good repair and capable of being cleaned and disinfected?
3. Does the layout, construction and size of the facilities impair food hygiene, safety or cleaning?
4. Is the galley provided with suitable general ventilation (at least 5–10 air changes per hour)?
5. Is there adequate lighting?
6. Is food storage separate from food preparation areas?
7. Is the dry food store pest proof, well ventilated, large enough for all food to be stored off the ground, and in a good state of repair?
8. Are there separate designated food preparation areas, e.g., butchery, bakery etc.?
9. Is the galley provided with suitable personal washing facilities e.g., foot, knee or sensor operated taps at suitable locations?
10. Is the galley provided with hand driers that prevent cross-contamination? Heated air hand driers are only suitable away from food preparation areas.
11. Are clean lavatories provided for exclusive use by catering staff?
12. Is there provision for the storage of external clothing outside the galley area?
13. Is the galley provided with a sufficient supply of disinfectant and cleaning products?

Equipment

14. Is food delivered to the installation in suitable containers?
15. Does the nominated competent person examine foods on receipt?
16. Is the galley provided with colour-coded chopping boards and knives to remove the risk of cross contamination?
17. Is the galley provided with suitable aprons, food containers, equipment such as cling film and foil dispensers to reduce cross contamination risks?
18. Is equipment etc. for raw meat preparation stored separately from ready to eat food preparation?
19. Is there adequate extraction in place e.g., canopy hoods?
20. Do freezers and refrigerators in the galley provide sufficient storage space to segregate high-risk and lower-risk foods?
21. Is there adequate storage space in order for stock rotation to control food quality and monitor expiry dates?

22. Can walk-in storage be opened from inside?
23. Is the galley provided with blast chillers for cook-chill operations and defrosting cabinets for thaw-cook operations?
24. Is the galley provided with waste bins with foot-pedal operated lids?
25. Is all equipment used to maintain food at fixed temperatures provided with temperature monitoring gauges?
26. Is equipment in good repair and capable of being cleaned and disinfected?

Access

27. Is access restricted to the galley/kitchen?
28. Are galley staff medically certified as fit?
29. Are all galley visitors free from any infectious condition and dressed appropriately, i.e., clean overcoat, footwear and head covering. Snoods may be required where food handlers have heavy facial hair growth?

Temperature Monitoring

30. Do monitoring procedures cover all the critical control points?
31. Do temperature monitoring records show that:-

Food Deliveries

- Frozen goods are below -12°C and preferably, below -18°C.
- Chilled goods are below +5°C.

Food Storage

- Frozen food is at or below -18°C.
- Refrigerated food is between +1°C and +5°C.
- Ice cream is below -18°C and destroyed if the temperature exceeds -2.2°C.
- Chillers hold food between 0°C and +3°C until unloaded.

Food preparation

- Cooked food: stored at or above +63°C.

- Reheated food: is be heated to at least +82°C. Food must not be reheated more than once.
- Cold food displays hold food at or below +5°C.
- Blast chillers reduce the core temperature of food from +63°C to +5°C or lower, within 90 minutes of being fully loaded.
- Blast chillers have automatic controls that include a thermometer accurate within 0.5°C, and a temperature recorder that is independently wired.

Food service

- Hot food displays hold food at or above +63°C.
- Cold food displays hold food at or below +5°C.

Allergens

32. Is there an allergen policy and how is this managed?
33. How are the risks associated with cross contamination managed?
34. Are all allergens appropriately declared?

Pest Control

35. Are there adequate pest control arrangements in place?

Personal protective equipment (PPE)

36. Are there cut resistant gloves for personnel working with cutting objects, e.g., knives?
37. Are there protective gloves for cleaning and wet work?
38. Are there full-length gauntlets, impermeable coveralls and eye protection for heavy duty degreasing with caustic products?
39. Is there adequate PPE available?
40. Are colour-coded uniforms, disposable aprons and hats, and safety shoes for food preparation, serving and cleaning provided as required?
41. Is contaminated outer clothing worn in a raw food preparation environment (e.g., aprons and overalls) changed before handling ready-to-eat foods or entering a clean area?

Maintenance, examination and testing

42. Does the catering manager plan and monitor equipment maintenance schedules?
43. Does the catering manager check that surfaces are clean and undamaged at the start of every shift?
44. Are kitchen extract systems checked to see that they are working and maintained to ensure their effectiveness?
45. Are the temperatures of foods in chilled storage checked twice per day?
46. Are the temperatures of hot foods checked at the beginning and end of each service?
47. Are the door seals on freezers, fridges and chillers checked at least once a week?
48. Are the temperature alarms checked at least once a month?
49. Does the catering contractor monitor and record the temperatures of delivered, prepared and stored food?
50. Are thermometers maintained and calibrated in line with manufacturers guidelines?
51. Is there a equipment/facilities defects log and is this appropriately managed/actioned?

Cleaning and housekeeping

52. Is there a clean and disinfection procedure?
53. Is the cleaning schedule and statement displayed in the galley? The schedule should show:
 - the responsible person;
 - the area, equipment and surfaces to be cleaned;
 - the cleaning frequency; and
 - the cleaning method.
54. Does the cleaner sign the schedule with date/time?
55. What arrangements are in place for contaminated clothing?
56. Are COSHH assessments in place for chemicals?
57. Is there adequate storage for cleaning chemicals?

Waste

58. Is food waste disposed of immediately?
59. Are waste bins emptied and cleaned out regularly?
60. Is waste disposed of in designated receptacles and segregated? If these are outside, workers must wear any designated PPE.

Personal hygiene and skincare

- 61. Are hand wash basins provided with hot and cold running water and are they foot, knee or sensor operated taps at suitable locations?
- 62. Are hand wash stations provided with mild skin cleansers, nailbrushes, and soft paper towels for drying?
- 63. Where nailbrushes are provided, are they kept clean and replaced when necessary?
- 64. Are galley staff instructed in how to clean their skin effectively?
- 65. Do galley staff shower before starting work and wash hands before and after every break.
- 66. Do galley staff keep fingernails short, wear no rings, nail varnish, perfume or deodorant.
- 67. Do staff ensure that cuts and abrasions are covered, e.g. with blue plasters?
- 68. Do staff report all illnesses?

Medical and health surveillance

- 69. Do food handlers' receive food hygiene related medical assessments as part of the OEUK medical every two years?
- 70. Do catering workers report all illnesses to their supervisor immediately, for a decision on reporting to the offshore medic?
- 71. Are staff enrolled in a targeted health surveillance programme which includes surveillance for dermatitis involving skin checks by a suitably trained responsible person?

Training and supervision

- 72. Is there effective supervision – to ensure that safe work procedures are followed?
- 73. Are training records reviewed at least once a year, and when the work changes?
- 74. Do catering workers have a basic food hygiene training certificate?
- 75. Do catering supervisors have the intermediate food hygiene training certificate?
- 76. Have persons completing the HACCP been provided with adequate training?
- 77. Are toolbox talks completed daily?
- 78. Have staff received training on equipment and food monitoring techniques?

Records

- 79. Does the catering manager keep temperature monitoring and menu records for at least three months?

80. Does the catering manager keep records of all examinations and tests for at least five years?

81. Is the shelf life of products recorded?

82. Are all products adequately labelled with ingredients and allergens?

Verification

83. Who is responsible for verification?

84. What verification checks are in place?

85. Are internal audits completed on a regular basis?

86. Are external audits completed on a regular basis?

87. Are management checks completed?

88. Does the contingency plan outline the sampling requirements during an outbreak of food poisoning?

89. What review arrangements are in place for the HACCP?

90. If there is a case of food poisoning, what measures are put in place and how is this investigated?

91. What is the product recall procedure and arrangements for testing?

Appendix 2 - Application of EMM and Dutyholder Performance Assessment

When inspecting food hygiene, dutyholder compliance is to be assessed against the relevant success criteria. The success criteria have been determined from specific regulatory requirements, defined standards, established standards or interpretative standards.

This assessment will determine the: EMM Risk Gap, the associated topic performance score together with the Initial Enforcement Expectation as shown in the table below.

The actual enforcement may differ from that consistent with the recorded topic score depending on dutyholder and strategic factors. However, should this occur then the relevant dutyholder and strategic factors should be identified in the inspection report.

The Topic Score recorded on COIN must be consistent with the Initial Enforcement Expectation

Further guidance can be found at: <https://www.hse.gov.uk/enforce/enforcement-management-model.htm>

Application of the EMM Inspectors should apply the EMM : Application to Health Risk, Formerly OC 130/5 - Enforcement Management Model (EMM) http://www.hse.gov.uk/foi/internalops/ocs/100-199/130_5/index.htm

When using the EMM for decisions on enforcement relating to food hygiene you should consider the following summaries of employer regulatory duties and examples of initial enforcement expectations.

EMM RISK GAP					
EXTREME	SUBSTANTIAL	MODERATE	NOMINAL	NONE	NONE
TOPIC PERFORMANCE SCORE					
60	50	40	30	20	10
Unacceptable	Very Poor	Poor	Broadly Compliant	Fully Compliant	Exemplary
Unacceptably far below relevant minimum legal requirements. Most success criteria are not met. Degree of non-compliance extreme and widespread. Failure to recognise issues, their significance, and to demonstrate adequate commitment to take remedial action.	Substantially below the relevant minimum legal requirements. Many success criteria are not fully met. Degree of non-compliance substantial. Failures not recognised, with limited commitment to take remedial action.	Significantly below the relevant minimum legal requirements. Several success criteria are not fully met. Degree of non-compliance significant. Limited recognition of the essential relevant components of effective health and safety management, but demonstrate commitment to take remedial action.	Meets most of the relevant minimum legal requirements. Most success criteria are fully met. Degree of non-compliance minor and easily remedied. Management recognise essential relevant components of effective health and safety management, and commitment to improve standards.	Meets the relevant minimum legal requirements. All success criteria are fully met. Management competent and able to demonstrate adequate identification of the principal risks, implementation of the necessary control measures, confirmation that these are used effectively; and subject to review.	Exceeds the relevant minimal legal requirements. All success criteria are fully met. Management competent, enthusiastic, and proactive in devising and implementing effective safety management system to 'good practice' or above standard. Actively seek to further improve standards.
EMM INITIAL ENFORCEMENT EXPECTATION					
Prosecution / Enforcement Notice.	Enforcement Notice / Letter.	Enforcement Notice / Letter.	Letter / Verbal warning.	None.	None.

It should be noted that:

- **the recorded score should reflect the most significant compliance gap identified relevant to the Inspection Guide.**
- the Inspection Guide and hence the allocated scores may not cover all the matters that were considered during the intervention.
- the intervention may not necessarily have used every part of the Inspection Guide – consequently the score only reflects what was inspected. **The inspection report should make it clear what aspects of the Inspection Guide the dutyholder has been scored against** (or it is clearly identifiable by a letter item).
- where the score only relates to limited aspect of the Inspection Guide then consideration should be given to consulting the IG owner before finalising the score.

- proposed inspection scores should be reviewed/discussed by the full inspection team before finalising.
- the impact of cumulative risk should be considered when scoring¹.
- the allocated performance score only reflects regulatory judgements about a dutyholders degree of compliance at a particular point in time.

Use of performance scores

HSE uses the performance scores as one of the many inputs to prioritise and plan future regulatory interventions. Prioritising intervention's is fundamental to ensuring HSE delivers its major hazards regulatory strategy whilst supporting businesses and the GB economy. HSE aims to ensure that regulatory activity is proportionate to the risk to people taking account a dutyholders performance in controlling risks. In general, this means the HSE will inspect major hazard installations and dutyholders with relatively poorer risk management performance more frequently and in greater depth than lower hazard installations and dutyholders where there is evidence of higher risk management performance.

¹ For example, two or three substantive scores of '30' will point strongly to an overall score of '40'. There is currently no mathematical or other systematic process for doing this and inspectors must therefore use their judgement to allocate an appropriate score that best represents the overall inspection findings against this IG.