



Handwashing Policy

Perhaps you have 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 handwashing violation?

Maybe it's time to create a handwashing policy, so you can ensure that your employees know what to check, when to check it, and what to do if something isn't right.

First of all, what is a policy and how do you create a handwashing 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 handwashing issue arise in each of these steps?

Preparation

Review various menu items that are prepared in your establishment. Consider which products are ready-to-eat (RTE) food and will not go through





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a cook step prior to service. Defining this will ultimately determine handwashing and utensil use requirements as it relates to these food items.

Assembly

When menu items are considered RTE, bare hand contact is not allowed. This is accomplished through the use of utensils or single use gloves. Proper handwashing must occur prior to donning gloves or engaging in any food assembly.

Cleaning

Review warewashing procedures in your establishment. Clean hands must be used to handle clean dishware. This may require specific procedures to eliminate the cross contamination of dishware by staff who are handling soiled dishware as part of the warewashing process.

Service to Customers

The delivery of food to your customers is the final step where contamination can occur. Staff will be touching the food contact surfaces while they serve the food to customers. Review these procedures to minimize this contact and ensure that all staff have clean hands prior to serving food.

Ask these questions for each of these operations:

Who is responsible?

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

What needs to happen?

Food employees shall properly clean their hands for at least 20 seconds using a cleaning compound at an approved handwashing sink.

When does it take place?

Food employees shall clean their hands immediately before engaging in food preparation including working with exposed food, clean equipment and utensils, and unwrapped single-service articles. Additionally, hands must be cleaned after using the restroom, after sneezing or coughing, and when switching between working with raw food and RTE food. Think about when all of these tasks occur and who performs each of them.



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Where does it occur?

Food employees shall clean their hands in a handwashing sink and may not clean their hands in a sink used for food preparation or warewashing. Are there enough handsinks and are they conveniently located?

How is this achieved?

Food employees shall clean their hands for at least 20 seconds using a cleaning compound in a handwashing sink. Do handsinks have a soap and paper towel dispenser conveniently located?

As you review these key operational steps, consider whether it would make sense in your business model to write several policies for handwashing. For example, you might write one policy for staff that prepare, assemble and serve food, and another to address staff that clean dishware and utensils.

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 proper handwashing is not being achieved. You can include a space for writing in corrective actions on your logs.

But don't stop here! Your handwashing 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.

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 handwashing policy, it won't do much to help your establishment. Check out the next document, a Manager's Guide to training your employees.