

HACCP

PROCEDURE VALIDATION

Approved by		Approval date
Operations (Process Owner)	F&B Operation Manager Operations Control Director Chief Operations Officer	March 2012
Internal Audit	SVP Internal Audit	
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UPDATED VERSION

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2	F&B Operation Manager	December 2018
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OBJECTIVE AND SCOPE

The **Hazard Analysis and Critical Control Points** system (HACCP) is a preventive process in which food safety is addressed through the identification, analysis and control of physical, chemical and biological hazards, from the raw materials passing through the stages of the manufacturing process to the distribution and consumption of the finished product.

The aim of this process is to define and explain the correct management of this system between the Operations department (hotels and F&B area) and the company assigned for hygienic-sanitary audits, always taking into account the legal requirements of each country.

This procedure applies to all hotels of all Business Units.

SUMMARY

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1 GENERAL EXPLANATION

Responsible: General Manager, Head of Department and all employees

When talking about **food security**, reference is made to the use of different resources and strategies to ensure that all foods are safe for consumption.

Although at present the levels of control and the European food chain are very safe, when it comes to food safety we must take into account a fundamental premise: zero risk does not exist.

Control systems, such as HACCP, as well as preventive or control measures, are fundamental pillars to reduce risk and guarantee safety.

The five general principles of food hygiene are:

1. Prevent contamination of food with pathogens that are transmitted from people, pets and pests.
2. Separate raw and cooked foods to prevent contamination of the latter (direct cross-contamination). Use different utensils to treat different foods or clean utensils in depth before putting them in contact with other types of food (indirect cross-contamination).
3. Cook the food during the appropriate time and at the right temperature to destroy the pathogens.
4. Store the food at the proper temperature.
5. Use potable water and cooked materials.

2 HACCP PRINCIPLES

The principles of HACCP established by FAO (Food and Agriculture Organization - United Nations) and WHO, for the application of the System of Hazard Analysis and Critical Control Points (HACCP) are the following:

- **Principle 1. Conduct a hazard analysis:** The identification of a food safety hazard consists in the determination of the biological, chemical or physical agents that may be present in a food and may cause an adverse effect on health. Therefore, food security risks must be analyzed and preventive measures must be identified to control them.
- **Principle 2. Identify Critical Control Points (CCP):** A critical control point (CCP) is a point, operation or stage of the food manufacturing process which requires effective control to eliminate or minimize to acceptable levels a danger to food safety.
- **Principle 3. Establish critical limits:** A critical limit represents the limits established to judge whether a product is safe or not. The critical limits that ensure control of the hazard must be established for each specified critical control point (CCP), and they must be defined as the criteria used to differentiate the acceptable from the unacceptable.
- **Principle 4. Establish a monitoring or control system:** Monitoring is the measurement or observation programmed in a CCP in order to assess whether the phase is under control, that is, within the limit or critical limits specified in Principle 3.
- **Principle 5. Establish corrective actions:** Corrective measures will be established when the evaluation of the CCP indicates a loss of control. A deviation from the critical limit of a CCP is considered a loss of control.
- **Principle 6. Establish verification procedures:** Application of methods, procedures, tests and other evaluations, in addition to monitoring, to determine compliance with the HACCP plan. The careful preparation of the HACCP plan, with the clear definition of all the necessary points, does not guarantee its efficiency. Verification procedures are necessary to evaluate the efficiency of the plan and confirm whether the HACCP system serves the plan. The verification allows the producer to ensure that there is sufficient control for all possibilities.
- **Principle 7. Establish a documentation system on procedures and records associated with HACCP:** The HACCP system requires hotels to maintain a documentation system including risk analysis, the HACCP plan and the records documenting the CCP reviews, critical limits, activities of verification and correction of deviations. Reviews or audits of records must be carried out at the company by qualified personnel or by external authorities, such as consultants, to ensure rigid compliance with the criteria established for the CCP.

3 HYGIENIC-SANITARY AUDIT SYSTEM

Responsible: *Assigned company, General Manager, Head of Department and all employees*

3.1 VISIT PLANNING

The company contracted to perform hygienic-sanitary audits visits the centers with a frequency of **3 visits per year** unless expressly requested by NH Hotel Group, in which case they are assigned a higher frequency of visits (6 or 12 visits per year).

The first visit is a diagnostic audit, in which an initial evaluation is carried out and the adequacy of the center is checked against the standards established in the company's Food Safety Manual and the requirements of local legislation.

A physical copy of this manual must be kept at the hotel by each department that interacts in any of the processes (kitchen, living room and general store, if it exists). IT is recommended that the General Manager also has at his/her disposal a copy of the manual to perform internal monitoring of compliance.

One the first visit has been made, the **follow-up plan** begins with the periodic visits, in which the hygienic-sanitary conditions of the facilities and the management thereof are verified from the field of food safety. The first visits are used for the gradual implementation of the HACCP system, helping the center to personalize the manual (prerequisites, implementation of self-monitoring records, etc.).

For the follow-up plan, the company uses a **custom checklist** adapted to the needs of the company that includes the supervision of all the food areas of the center, reviewing the state of maintenance, conservation and cleaning of the same, as well as the management of work procedures, good practices and implementation of the HACCP system.

In each of the visits, the sample collection established in the sampling plan (food, surfaces in contact with food and drinking water) is carried out.

3.2 REPORTS AND DATA MANAGEMENT

All the information of the verification activities is loaded into the system of the contracted company (reports, analytical results). Each audit report automatically generates a report of the main incidents detected. The General Manager has access to this information through his/her login and password.

This food safety data management tool allows obtaining information regarding the implementation of the FSMS (Food Security Monitoring System) of NH Hotel Group at the hotels, hotel groups, countries, Business Units, worldwide, according to different periods of time, analysis of trends, most relevant outstanding issues, etc.

If a critical situation is detected during the visit and/or in the microbiological results obtained, the assigned auditor responsible for the management of the center will be in direct contact with the person in charge of the hotel.

The execution of the improvements proposed by the company, as well as compliance with the indicated deadlines, are mandatory. Failure to achieve may result in administrative sanctions by the state agencies responsible for compliance.

At the request of a specific center, reinforcement visits can be made, such as:

- Support visits facing food alerts.
- Extra collections of samples in extraordinary situations (intoxications, customer complaints, etc.).
- Support visit to official verification visits of the self-monitoring system carried out by public health inspectors.

Upon request of the General Manager, it is possible to establish food-handling, allergen control and HACCP system courses.

4 PROCEDURE OF ACTION IN THE EVENT OF HEALTH INCIDENCE, ALERT OR ALARM

Responsible: General Manager, Head of Departments, Regional Director, F&B Department, Crisis Committee (if apply)

In cases of health incidence, alert or alarm in hotels, there is an action protocol, as well as an internal and external information flow that applies to all the hotels of the company.

For more details, consult the *Food Safety Procedure*.

