ESTABLISHING A UNIFORM POLICY: HEAD TO TOE

A clear uniform policy that is adhered to by employees not only prevents product contamination, but also is critical to passing an audit.
In today's world of documentation and written policies, it is not uncommon to find food plant managers covered in paperwork and overwhelmed by the amount of work required to actually develop effective plant policies that meet their specific needs. One problem that managers face is the lack of guidance and resources available to write effective food plant policies that not only meet regulatory and customer requirements, but also meet their plant's unique challenges.

One important plant policy that applies to every employee and may be difficult to design is the uniform policy. The GMPs and many food industry standards require that food plant personnel wear clean uniforms or work clothing that are not decorated with items that could easily fall into the product. But, aside from very general requirements (i.e. suitable footwear, clean uniforms, effective hair restraints, no shirt pockets, etc.) there is not a lot of specific direction provided for developing a more detailed policy.

This article provides a head-to-toe look at the items that should be considered in a uniform policy that not only meet industry requirements, but go above and beyond the basics to ensure that employee uniforms are not a source of food product contamination. The focus is food safety. Employee safety implications must also be considered, but are not fully examined here. Consider these suggestions as they apply to your food facility and examine your uniform policy to determine if any updates are needed. And keep in mind that a good uniform policy will address all plant personnel, not just production.

**HEAD**

**Hard Hat/Bump Cap**

What's the first thought that comes to mind when you see someone wearing a hard hat or bump cap? If it's out of context, then you probably assume that person works in construction or a job where safety is an issue. Many food plant workers, especially maintenance employees, wear hard hats as part of their daily job. When considering whether or not to include this item as part of your employee uniform, answer a few questions:

- Is it needed for safety?
- What positions or departments should wear the hats for protection?

Although hard hats are a safety device used to offer head protection, they can also be a hindrance because they can limit vision. This should be considered when selecting the size and style of hard hat to issue employees. Another thing to consider when selecting hard hats is to order a variety of colors. Some plants use a color-coded hat system to identify departments or employee seniority levels. Others may color-code hats by area, such as pre-kill step (red), post-kill step (blue) allergens used (green), and non-allergen area (white). One excellent idea is to have a designated color of hard hat that visitors or contractors wear to easily identify them as non-employees.

In addition to employee safety concerns, food safety considerations should also be made. The uniform policy should clearly state the predetermined frequency and necessary procedures as part of
the bump cap/hard hat cleaning program. The policy should also make it clear that hard hats are not to be taken off-site, but must remain in employee lockers or other on-site storage area.

Stickers and other adornments should be prohibited, but there is an excellent opportunity to attach tethered earplugs to the hats, if used at the facility. This will prevent the loss of earplugs in the facility and help your facility avoid instances of product contamination.

Finally, the policy must clearly establish that bump caps/hard hats are not a substitute for hair nets. Effective hair restraint is required beneath the caps/hats.

Knit Cap (Head coverings for warmth)

Employees that work in cold areas of the facility where frozen or refrigerated products are handled or stored will often wear additional items with the standard employee uniform, such as knit caps, to keep warm. Sometimes these are company-issued caps; other times facilities may allow employees to wear personal caps. Either way, there are certain food safety considerations to include in the uniform policy.

Each food company should determine if it will require hairnets to be worn in conjunction with these items. Most head coverings for warmth will fully contain hair and therefore hairnets are not required. However, some companies decide that “everyone wears a hairnet” and require the hairnet to be worn over the knit cap. One thing to consider is that if the knit cap is covered with a hairnet, it is more difficult to identify dirty caps. On that note, the policy should also include that knit caps must be regularly laundered and specify if it will be done by employees, in-house laundry, or a contracted service. The policy should also state that knit caps must be in good condition. Loose threads are an adulteration concern.

Hair Covers

The AIB Consolidated Standards for Inspection, which are based on the GMPs and common industry expectations, requires that “Personnel wear effective hair restraints to fully contain hair, if applicable. Hair restraints include head, beard or moustache covers.” (Stnd 1.30.1.3) However, it is up to each facility to determine any more specific policy inclusions.

It may not seem as if employee safety would be a consideration when determining the type of hairnet to provide employees, however the material is important to consider, especially for those who work in areas where welding takes place. Certain materials may cause a spark hazard. The hairnet material selected is also important to food safety. Some food facilities require fine-mesh hairnets, while others use the bouffant style. Regardless, it is important to realize that wide-mesh hairnets are ineffective at preventing hair from contaminating the food product.

One hair cover requirement that all plants agree on is that the items are clean at the beginning of each shift. However, a not-so-clear area of debate is whether employees with shaved heads are required to wear hairnets. This is up to each plant to determine requirements. A shaved head is “effective hair restraint” and meets AIB and government requirements; however for enforcement purposes, it may be easier to require that all personnel wear hairnets.

Surprising to some, a “one size fits all” approach is not acceptable for hairnets. If the net is too large it won’t be tight or contain hair. Conversely, if it is too small, hair will stick out, making it ineffective. Each plant should ensure that the correct sizes are available for all employees.

Hair cover color is another consideration to address in the uniform policy. On most people, dark colored hairnets, such as brown and black, make it difficult to determine if they are wearing a hairnet without looking closely. As with the hard hats suggestion, some plants assign different colors of hair covers for various departments (high-risk vs. low-risk areas) or assign a certain color to identify visitors or contractors.

Facial hair is not exempt from the hair restraint standard. It is up to each plant to define which type of facial hair requires a beard net. Some common approaches include:

- Any facial hair below the corner of the mouth.
- More than a day’s growth.

Eyewear

In the world of OSHA and other employee safety regulations, it is important, not only as an employee service but also as a requirement, to provide hearing protection and conservation devices. First determine if hearing protection is required at your facility. If so, is it area or position dependent? Your facility’s expectations on when and where to wear hearing protection devices will need to be clearly defined in the uniform policy. Also, it is important to determine if employees encounter a safety conflict when driving a forklift while wearing hearing protection. If it is determined that there is a conflict, another method of protection should be provided.

Although hearing protection is primarily an employee safety issue, it also needs to be addressed in the uniform policy from a food safety perspective. If custom-molded earplugs or ear muffs are used, the facility should have a cleaning program in place that addresses the frequency of cleaning and the procedure used to prevent contamina-

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TORSO

Shirts

We’ve all seen the restaurant signs saying “No shoes. No shirt. No service.” However, for the food industry the requirements are a little more specific than just wearing a shirt! The type of shirt plays a very important role in employee safety and product safety. Some facilities, especially those in cold climates or where employees will be working in refrigerated or freezer areas, allow long sleeves to be worn at work. In these instances, it is important to consider the potential for long sleeves getting caught in equipment. This is an important employee safety issue.

Sleeves, pockets and buttons are probably the three most important items to inspect on employee shirts. At a minimum, the sleeves should cover armpits to prevent hair and sweat contamination. Shirts should not have any pockets. If a uniform company provides the shirts and they come with pockets that cannot be removed, they should be sewn shut to prevent items from being carried in them and falling onto the product line. Additionally, shirts should either be pull-over style (i.e. t-shirts) or fasten with snaps, not buttons. If street clothes may be worn, the uniform policy should specifically address that no adornments (buttons, beads, etc.) be worn.

Some plants choose to provide color-coded uniform shirts by department or by plant area, as with hard hats and hairnets. If a color-code system is used, it should be included in the uniform policy so that everyone knows which color of shirt is worn by which department or area.

Additionally, facilities should include provisions for shirts for new or temporary employees who do not have company-issued uniforms.

Aprons

Aprons may be worn over clothing as an additional protective measure. From a safety perspective, plants should consider the likelihood of the aprons getting caught in equipment and harming the employee. In areas where this danger is likely or possible, aprons should be prohibited. Certain plant activities, especially maintenance tasks, may require that vinyl aprons be worn as part of the required Personnel Protective Equipment (PPE). Metal mesh aprons are also sometimes worn for cutting operations (i.e. butcher) to protect the employee’s body from harm. Each food facility should consider the various tasks undertaken in every department to determine if aprons are necessary for employee safety and include these instances of use in the uniform policy.

When aprons are used, there are certain food safety considerations to keep in mind related to each type of material. For example, disposable aprons tend to tear easily and metal mesh aprons could pose a metal contamination risk. Cloth aprons are often used in food plants, but are not appropriate for micro-sensitive products or around various powdered allergens because they can easily cause cross contamination. If cloth aprons are part of the standard uniform, the policy should address who will launder the items: the employees, an on-site laundry service or a contracted provider. If aprons are only needed during particular operations, such as while weighing allergens, this should be specified in the policy.

Aprons should never be worn in restrooms or employee break areas. There should be designated hooks for storage when employees leave their work areas. Additionally, separate hooks for different risks (i.e. pre-kill and post-kill stages, allergen segregation, etc.) are needed to prevent cross-contamination from occurring when aprons are placed next to other aprons from different areas.

Smocks/Lab Coats

Similar to apron usage, some food plant departments or activities may require employees to wear smocks or lab coats as part of the uniform. In addition to sleeve length, the length of the smock or lab coat should be short to reduce the likelihood of the item from getting caught in equipment. Lab jackets, which are shorter in length, are a good alternative to smocks or coats. The sleeve end is another important safety consideration. Plants should determine if open-ended or elastic-cuff sleeves are to be used.

Like the shirt requirement, no exterior pockets above the waist should be present on outer garments. Pockets on the inside of coats are acceptable, because items will not fall out if personnel bend over, and pockets below the waist are typically okay because they are not generally above
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product and pose less of a risk of product contamination. If coats come from a uniform company with upper, exterior pockets that cannot be removed, have them sewn shut. Also, no buttons should be present on smocks or lab coats. Instead, Velcro or snaps can be used as closures.

Like other items previously mentioned, the color-code system can be used with smocks and lab coats. A great suggestion is to use color-coded outer garments to identify visitors, even if these outer garments are not part of your employee uniforms.

Coveralls
Coveralls have a unique food safety hazard linked to them. When using the restroom, a majority of the overall is lying on the floor unless it is completely removed from the employee’s body. This is unsanitary and a source of contamination. The uniform policy should address how coveralls are to be handled during restroom visits.

Coveralls are no exception to the “no pockets, no buttons” requirement previously mentioned. There should be no exterior pockets above the waist; however, pockets inside coveralls are acceptable because items will not fall out if personnel bend over. Also, pockets below the waist are okay in operations where the product is at waist level or above. If coveralls come from a uniform company and have upper/exterior pockets that cannot be removed, they should be sewn shut.

ARMS/ HANDS
Gloves
Gloves are often used in food facilities for warmth, for handling hot surfaces, for cutting operations, and most commonly, for food handling. In fact, some states and some customers require gloves to be worn by food handlers.

It should be clear to employees that gloves are a substitute for handwashing. Gloves should not be taken out of processing areas when an employee takes a break or uses the restroom. Gloves should be changed as often as hand washing is required. Disposable latex gloves are not recommended because of a growing allergy risk. Nitrile is an appropriate alternate material. If reusable gloves are used, there must be designated storage areas for them. Be careful of employees writing their names on the gloves with a marker that could leach into the product.

Sleeves
Sleeves are commonly worn in chemical-handling and cut-produce operations. If worn, the facility should evaluate the risk of the sleeves getting caught in equipment and take precautions to prevent this from occurring. The uniform policy should state when sleeves are to be worn as PPE, especially when handling chemicals.

LEGS
Pants
Long pants should be worn to protect against scrapes and hot surfaces. Short pants are often worn in areas with a high heat index. With either length, buttons pose a greater risk of product contamination than snaps or clasps. If street clothes can be worn, the policy should state that they must be clean at the start of each shift. Cargo-style pants with exterior pockets located on the lower thigh area are often acceptable for storage of tools (thermometers, stopwatch, pens, etc.).

FEET
Shoes
There are a few safety requirements that shoes worn in food facilities must meet. They should be:

- Slip-resistant
- Flat
- Closed-toe and closed-heel.

In addition, some plants adopt a captive shoe policy, in which shoes worn in work areas do not leave the company premises. In this case, a direct area should be provided for employees to walk in their street shoes to a changing area where the work shoes are provided. If a captive shoe policy is used, visitor provisions should be included in the policy.

The use of steel-toed shoes should also be reviewed and determined by the plant’s safety team.

Uniform policies must be risk-based. High-risk products will include provisions for:

- No uniform component (including footwear) may be worn off-site.
- Easily removable outer garments are provided and are removed when personnel leave processing areas. They are never worn into restrooms or on breaks (including smoking).

Every food plant should have a uniform policy defined in writing and enforced. A good uniform policy will address all personnel, not just production personnel. Safety considerations are unique to each plant. A complete review of all uniform components by the company’s safety officials is imperative.

From the food safety perspective, there is a trend in GFSI-benchmarked audits to include a provision for validating the cleanliness of uniforms. A clear uniform policy that is adhered to by employees not only prevents product contamination, but it also helps plants pass that part of their audits.

It is so important that a good policy is not only developed, but also implemented in a way that educates employees about the importance of the “rules.” When the why is just as important as the how or when, a practice is necessary so the policy’s message will be more easily understood and followed.

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