

Food Hygiene Allergens and Cross-Contamination Control

Business Name:		ABN:
Business Address:		
Contact Person:	Phone:	Email:

THIS RISK ASSESSMENT IS APPROVED BY THE PCBU ON THIS PROJECT

Under the Work Health and Safety Regulation (WHS Regulation), a person conducting a business or undertaking (PCBU) is required to ensure that a RISK ASSESSMENT is prepared before the proposed work starts.

Full Name:		
Signature:	Title:	Date:

CLIENT OR PRINCIPAL CONTRACTOR DETAILS

Client:	SCOPE OF WORKS
Project Name:	
Project Address:	
Project Manager:	
Contact Phone:	
Date Risk Assessment supplied to Project Manager:	



RISK MATRIX									
LIKELIHOOD	INSIGNIFICANT	MINOR	MODERATE	MAJOR	CATASTROPHIC	SCORE	ACTION	HIERARCHY OF CONTROLS	
ALMOST CERTAIN	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4 ACUTE			Elimination Remove the hazard.	
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED	Substitution Replace the hazard.	
POSSIBLE	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	4 ACUTE	3H HIGH	Review before work starts.	Isolation Isolate People from the hazard	
UNLIKELY	1 LOW	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	2M MODERATE	Ensure control measures in place.	Engineering Isolate the hazard	
RARE	1 LOW	1 LOW	2 MODERATE	3 HIGH	3 HIGH	1L LOW	Monitor and keep records.	Administrative Change	
								PPE	

Risk Rating & Required Action:	
4A	Stop work. The risk is intolerable. Eliminate the hazard or redesign the activity before proceeding. A Safe Work Method Statement (SWMS) or higher-level authorisation is required.
3H	Review and approve additional controls before task starts. Senior supervisor sign-off needed.
2M	Ensure all nominated controls are in place and effective. Proceed with caution; monitor conditions.
1L	Proceed, following standard operating procedures. Monitor and keep records.

Consequence Scale:			
Consequence	People (injury/illness)	Project / Assets	Compliance / Reputation
Catastrophic	Fatality or permanent total disability	project shutdown	Significant regulator intervention; criminal prosecution
Major	Serious injury/illness (hospital > 5 days)	critical delay	Improvement notice; major media coverage
Moderate	Medical-treatment injury; lost-time > 1 day	moderate delay	Minor breach; adverse client comment
Minor	First-aid only, no lost time	negligible delay	Isolated non-conformance
Insignificant	No injury	no schedule impact	Deviation caught and corrected on site

Notes on Hierarchy of Controls:
Remember to apply controls in the preferred order shown by the coloured pyramid:

1. **Eliminate**
2. **Substitute**
3. **Isolate**
4. **Engineering**
5. **Administrative**
6. **PPE**

Always document **why** a lower-order control is accepted if elimination or substitution is not reasonably practicable.

aligned with Safe Work Australia's Managing the risk of fatigue at work (2023) and ISO 45001:2018 clauses 6–8.

JOB STEP	POTENTIAL HAZARDS	IR	CONTROL MEASURES	RR
SPECIFIC WORK STEPS	HAZARDS THAT MAY ARISE	INITIAL RISK	SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS	RESIDUAL RISK
1. WHS Governance, Legal Compliance and Due Diligence	<ul style="list-style-type: none"> Lack of documented WHS and food safety governance structure specific to allergens and cross-contamination Failure to integrate WHS Act 2011 and Food Standards Code into local policies and procedures Inadequate senior management oversight and resourcing for allergen and hygiene risk management No formal review of legal changes or industry best practice for food allergen control Poor communication of legal duties to officers, managers and supervisors Inadequate consultation with workers on allergen and food hygiene system risks 	4A	<ul style="list-style-type: none"> Establish and document a WHS and food safety governance framework that clearly assigns accountability for allergen and contamination risk management to officers and senior managers Integrate requirements of the WHS Act 2011, WHS Regulations and Food Standards Code (including allergen declaration obligations) into site-specific policies and procedures Implement an annual WHS and food hygiene compliance audit schedule, including verification of allergen and cross-contamination controls Develop a documented due diligence checklist for officers covering allergen management, food hygiene and contamination control performance indicators Conduct regular management review meetings where allergen incidents, near misses, complaints and audit findings are tabled and actioned Maintain a legal standards register and assign responsibility to monitor changes in Australian allergen and food safety requirements Implement a documented worker consultation process (e.g. HSRs, toolbox meetings) that includes allergen and hygiene system risks and improvement ideas 	3H
2. Food Safety and Allergen Management Policy Framework	<ul style="list-style-type: none"> Absence of a formal food safety policy addressing allergens and cross-contamination Inconsistent expectations across sites regarding personal hygiene, food hygiene and allergen practices Policies that focus on general safety but omit allergen-specific controls and communication requirements Failure to align policy with safe provision of allergen-free meals upon request Lack of clear escalation protocols for suspected allergen exposure or contamination events 	4A	<ul style="list-style-type: none"> Develop a written Food Safety and Allergen Management Policy endorsed by senior management, explicitly addressing food allergens, cross-contamination and hygiene standards Define clear organisational standards for dealing with food allergens, including identification, segregation, labelling and communication to customers and workers Incorporate expectations for personal hygiene, handling of raw food items, use of dedicated utensils, and management of condiment dispensers and salad bars into policy documents Include specific guidance for safely preparing and serving allergen-free meals upon request, including when such requests cannot be safely met Establish formal incident reporting and escalation procedures for suspected allergen exposures, near misses and contamination events Review and reissue the policy at planned intervals and when menu, process or legal changes occur 	2M
3. Food Premises Design, Layout and Infrastructure	<ul style="list-style-type: none"> Kitchen and canteen layouts that do not permit effective segregation of allergen-containing and allergen-free preparation areas Insufficient space at prep stations, salad bars and condiment areas leading to physical cross-contamination 	4A	<ul style="list-style-type: none"> Undertake a formal premises design risk assessment to identify and address allergen and cross-contamination hazards in kitchen, canteen and food service layouts Establish clearly demarcated allergen preparation zones and allergen-free zones using physical barriers, colour coding and signage where reasonably practicable Ensure food contact surfaces, equipment and benchtops are constructed from materials that are smooth, impervious and easy to clean and sanitise 	2M

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	<ul style="list-style-type: none"> Inadequate ventilation or extraction causing airborne flour or dusts to contaminate allergen-free zones Poorly designed or deteriorated food contact surfaces that are difficult to clean and sanitise Lack of designated allergen storage areas and inadequate segregation from general storage Shared sinks, dishwashers and handwashing stations without consideration of allergen risk 		<ul style="list-style-type: none"> Design salad bars, buffet lines and condiment stations to minimise customer cross-handling, including sneeze guards and separate serving utensils Implement designated storage areas, shelving and sealed containers for allergen-containing ingredients, segregated from allergen-free items Ensure adequate provision and placement of handwashing facilities, utensil washing stations and dishwashers to support effective allergen removal and hygiene Include allergen and cross-contamination considerations in all refurbishment, fit-out and new equipment procurement decisions 	
4. Supplier, Ingredient and Allergen Information Management	<ul style="list-style-type: none"> Inaccurate or incomplete allergen information from suppliers for raw ingredients and processed foods Uncontrolled changes to ingredients or suppliers without review of allergen content Reliance on verbal supplier assurance with no documented verification process Failure to detect reformulation of products that introduce new allergens Lack of central register of allergens present on site and in menu items Poor system for managing precautionary allergen statements such as 'may contain' on supplied products 		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M
5. Menu Design, Allergen Labelling and Customer Information	<ul style="list-style-type: none"> Menu descriptions that do not accurately reflect allergen content of meals Failure to identify and communicate common food allergens present in menu items Inadequate system for updating menus, display cards and digital ordering platforms following recipe changes Absence of a controlled process for taking and documenting allergen-free meal requests 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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	<ul style="list-style-type: none"> • Overreliance on verbal communication from front-of-house staff without system checks • Lack of clear disclaimers regarding limitations in providing allergen-free meals 		[REDACTED]	
6. Personal Hygiene Management and Behavioural Standards	<ul style="list-style-type: none"> • Inadequate handwashing practices leading to cross-contamination between allergen and non-allergen foods • Poor personal hygiene habits such as touching face, hair or mobile phones during food preparation • Inconsistent use of gloves, aprons and hair restraints where these are part of hygiene systems • Insufficient supervision and reinforcement of hygiene standards in busy service periods • Lack of policy for exclusion or restricted duties for workers with infectious illness • Use of personal items (phones, pens, jewellery) in food preparation zones increasing contamination risk 	3H	[REDACTED]	1L
7. Kitchen and Preparation Area Operational Controls (System Level)	<ul style="list-style-type: none"> • Lack of structured system to segregate raw and ready-to-eat foods during preparation and storage • Uncontrolled use of shared chopping boards, knives and equipment between allergen and allergen-free tasks • Inadequate scheduling of production activities leading to simultaneous handling of high-risk allergens and allergen-free meals • Poorly defined workflow at prep stations resulting in cross-traffic and contamination • No formalised system for managing allergen cross-contact in high-risk 	4A	[REDACTED]	2M

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	processes such as baking, frying and marinating		[REDACTED]	
8. Allergen-Free Meal Provision and Verification Systems	<ul style="list-style-type: none"> Absence of a defined process for assessing whether allergen-free meals can be safely provided Inadequate documentation of individual allergen requirements and agreed controls Failure to use dedicated or effectively cleaned equipment and surfaces for allergen-free meals Lack of final verification step to confirm the correct allergen-free meal reaches the correct person Inconsistent use of distinct packaging or labelling for allergen-free meals Overpromising risk-free meals in environments where cross-contact cannot reasonably be eliminated 	4A	[REDACTED]	2M
9. Salad Bars, Buffet Lines and Condiment Dispenser Controls	<ul style="list-style-type: none"> Customers using shared utensils and causing cross-contamination between dishes at salad bars and buffets Poorly designed condiment dispensers that allow direct food contact and contamination Lack of supervision of self-serve areas leading to unsafe practices by patrons Inadequate replenishment procedures resulting in topping up old product and harbouring contaminants Insufficient cleaning and sanitising regime for salad bar surfaces, utensils and dispensers Unclear or absent allergen information for salad bar and self-serve condiment items 	3H	[REDACTED]	1L
10. Cleaning, Sanitation and Cross-	<ul style="list-style-type: none"> Inadequate cleaning procedures failing to effectively remove allergen residues from equipment and surfaces 	4A	[REDACTED]	2M

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Contamination Prevention Systems	<ul style="list-style-type: none"> Unclear cleaning responsibilities and schedules leading to missed tasks in food prep and service areas Use of the same cleaning cloths and sponges across allergen and non-allergen areas Insufficient validation of dishwashing and sanitising processes to remove allergens and pathogens Incorrect dilution, storage or use of cleaning chemicals compromising effectiveness Failure to include salad bars, condiment dispensers and raw food handling areas in formal cleaning programs 		[REDACTED]	
11. Training, Competency and Supervision of Food Handlers	<ul style="list-style-type: none"> Lack of formal training on food allergens, cross-contamination and personal hygiene for new and existing staff Overreliance on informal on-the-job training resulting in inconsistent practices Supervisors not competent to monitor and correct allergen and hygiene related behaviours No structured assessment of competency before workers handle high-risk tasks such as allergen special preparation Inadequate refresher training following incidents, menu changes or audit findings Language and literacy barriers preventing full understanding of allergen and hygiene procedures 	4A	[REDACTED]	2M
12. Documentation, Recordkeeping and Verification	<ul style="list-style-type: none"> Incomplete or inconsistent records of allergen management activities, cleaning, temperature checks and inspections 	3H	[REDACTED]	1L

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	<ul style="list-style-type: none"> Inability to demonstrate due diligence or traceability following an allergen or contamination incident Overly complex documentation systems that discourage accurate completion by workers Failure to review records to identify trends, recurring issues or system failures Loss or unauthorised alteration of critical food safety and allergen records 		[REDACTED]	
13. Incident, Complaint and Emergency Response Management	<ul style="list-style-type: none"> No clear procedure for responding to suspected allergen reactions or serious food contamination events Delayed medical response due to poor recognition of allergen reaction symptoms or uncertainty about escalation steps Inadequate internal reporting and investigation of near misses and customer complaints related to allergen or hygiene Failure to isolate and trace potentially contaminated food products following an incident Lack of communication protocols w regulators, health authorities and affected parties after serious incidents 		[REDACTED]	2M
14. Monitoring, Audit and Continuous Improvement of Allergen and Hygiene Systems	<ul style="list-style-type: none"> Static systems that are not reviewed in light of incidents, near misses or regulatory updates Infrequent or superficial audits that fail to detect systemic allergen and hygiene issues Lack of performance indicators related to allergen control, personal hygiene compliance and contamination prevention 	3H	[REDACTED]	1L

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	<ul style="list-style-type: none"> Insufficient follow-up on corrective actions arising from audits and inspections Failure to involve workers in identifying practical improvements to systems and procedures 		[REDACTED]	
15. Contractor, Visitor and Third-Party Management in Food Premises	<ul style="list-style-type: none"> Contractors and visitors entering food preparation and service areas without understanding allergen and hygiene requirements Third-party delivery drivers or service providers contaminating food prep zones or storage areas Inadequate control over external catering or food stalls operating on site with differing allergen and hygiene standards Insufficient induction and supervision arrangements for temporary staff and agency workers Lack of agreements with third parties regarding compliance with allergen and hygiene management systems 	3H	[REDACTED]	1L

SAMPLE

EMERGENCY RESPONSE – CALL 000 FOR EMERGENCIES

Ensure to have an Emergency Management Plan in place as well as adequate numbers of trained first aid staff with easy access to fully stocked first aid kits, rescue equipment, material safety data sheets, adequate access to emergency communication equipment and fire-fighting equipment suitable for all classes of fire and ignition sources.

LEGISLATIVE REFERENCES

RELEVANT LEGISLATION AND CODES OF PRACTICE. DELETE THE LEGISLATIVE REFERENCES FOR ANY STATE THAT ARE NOT APPLICABLE

Queensland & Australian Capital Territory

Work Health and Safety Act 2011
 Work Health and Safety Regulations 2011
 Legislation QLD: <https://www.worksafe.qld.gov.au/laws-and-compliance/work-health-and-safety-laws>
 Codes of Practice QLD: <https://www.worksafe.qld.gov.au/laws-and-compliance/codes-of-practice>
 Legislation ACT: <https://www.worksafe.act.gov.au/laws-and-compliance/acts-and-regulations>
 Codes of Practice ACT: <https://www.worksafe.act.gov.au/laws-and-compliance/codes-of-practice>

Victoria

Occupational Health and Safety Act 2004
 Occupational Health and Safety Regulations 2017
 Legislation VIC: <https://www.worksafe.vic.gov.au/occupational-health-and-safety-act-and-regulations>
 Codes of Practice VIC: <https://www.worksafe.vic.gov.au/compliance-codes-and-codes-practice>

New South Wales

Work Health and Safety Act 2011
 Work Health and Safety Regulations 2025
 Legislation NSW: <https://www.safework.nsw.gov.au/legal-obligations/legislation>
 Codes of Practice NSW: <https://www.safework.nsw.gov.au/resource-library/list-codes-of-practice>

Western Australia

Work Health and Safety Act 2020
 Work Health and Safety Regulations 2022
 Legislation Western Australia: <https://www.commerce.wa.gov.au/worksafe/legislation>
 Codes of Practice WA: <https://www.commerce.wa.gov.au/worksafe/codes-practice>

Northern Territory

Work Health and Safety (National Uniform Legislation) Act 2011
 Work Health and Safety (National Uniform Legislation) Regulation 2011
 Legislation NT: <https://worksafe.nt.gov.au/laws-and-compliance/workplace-safety-laws>
 Codes of Practice NT: <https://worksafe.nt.gov.au/laws-and-compliance/codes-of-practice>

Safe Work Australia Links

Law and Regulation (All States): <https://www.safeworkaustralia.gov.au/law-and-regulation>
 Model Codes of Practice: <https://www.safeworkaustralia.gov.au/resources-publications/model-codes-of-practice>

South Australia

Work Health and Safety Act 2012 (SA)
 Work Health and Safety Regulations 2012 (SA)
 Legislation for SA: <https://www.safework.sa.gov.au/resources/legislation>
 Codes of Practice for SA: <https://www.safework.sa.gov.au/workplaces/codes-of-practice#COPs>

Model Codes of Practice

- Managing noise and preventing hearing loss at work
- Confined spaces
- Labelling of workplace hazardous chemicals
- Managing risks of hazardous chemicals in the workplace
- Welding processes
- First aid in the workplace
- Managing the risk of falls at workplaces
- Hazardous manual tasks
- Managing the risk of falls in housing construction
- Managing electrical risks in the workplace
- Demolition work
- Excavation work
- Work health and safety consultation, cooperation and coordination
- Managing the work environment and facilities
- How to manage work health and safety risks
- Managing risks of plant in the workplace
- Construction work

Tasmania

Work Health and Safety Act 2012
 Work Health and Safety (Transitional and Consequential Provisions) Act 2012
 Work Health and Safety Regulations 2012
 Work Health and Safety (Transitional) Regulations 2012
 Legislation for TAS: <https://worksafe.tas.gov.au/topics/laws-and-compliance/acts-and-regulations>
 Codes of Practice for TAS: <https://worksafe.tas.gov.au/topics/laws-and-compliance/codes-of-practice>

Details of permits, licenses or access required by regulatory bodies (add or delete as required):

- Permits from local council
- Authorisation to commence work
- Any required documents.