

*We are called by God to be a prophetic witness in the city of Adelaide so that new life and vitality will be generated in our city and its people. We celebrate in our unity and diversity, our shared beliefs and past experiences, and value worship, teaching, creativity and justice.*

CCP-10

## FOOD SAFETY AND ASSISTANCE ANIMALS POLICY

### 1. Introduction

As part of its ministry and mission, Pilgrim Uniting Church offers food to the homeless and disadvantaged through the Open Lounge and Sunday Night Tea programs, and by supporting the special feasts provided by the Adelaide Angels on Easter Sunday and Christmas Day. In all these areas of mission, food is prepared and plated up, usually in the kitchen, and then served from open platters and bowls on tables. Serving areas are either directly adjacent to tables where people eat or in confined areas where many people are being served at the same time. Pilgrim is committed to ensuring that this hospitality is provided in a safe and healthy environment for everyone.

As a non-profit community group that is handling food, Pilgrim is considered to be a “food business” under the *Food Act SA 2006*. However, as no money is being collected for the service, volunteers are not required to have the same training and knowledge as commercial food businesses.

Assistance Animal Public Access Rights are protected under Section 9 of the *Disability Discrimination Act 1992*. In SA, Assistance Animals (e.g. dogs) are registered and accredited by the Dog and Cat Management Board and often wear a jacket or harness which identifies them as such. Their owners carry a credit card sized identification card which has a photo of the dog(s) and the owner. Companion Dogs can have similar public access rights if they have passed the ‘public access test’ (PAT), an annual assessment of a dog’s suitability as an assistance dog accessing public spaces.

*Safe Food Australia* Standard 3.2.2, Section 24 (1) states: “A food business must:

- (a) subject to paragraph (b), not permit live animals in areas in which food is handled, other than seafood or other fish or shellfish;
- (b) permit an assistance animal only in dining and drinking areas and other areas used by customers”.

### 2. Purpose

This policy, and its procedures, has been developed to ensure the areas where food is handled at Pilgrim are safe for everyone and the conditions comply with relevant legislation and standards. Further information about the legislation and standards is included in the accompanying Appendix.

### 3. Policy

Pilgrim staff and volunteers will only allow Accredited Assistance Animals to accompany their owners into indoor areas where food is to be consumed and they will ensure that these animals are kept away from areas where food is handled.

The procedures that follow will enable Pilgrim to offer safe and healthy hospitality for all, hospitality that complies with Food Safety Standards and meets the Assistance Animal Public Access Rights under the Disability Discrimination Act 1992.



#### Authorisation

Church Council Chair:

Date of approval: 12 February 2020

Review Date: February 2022

## FOOD SAFETY AND ASSISTANCE ANIMALS PROCEDURES

### 1. Responsibilities

Church Council has delegated the responsibility for monitoring the implementation of this Policy to the co-coordinators of Sunday Night Tea and the coordinator of Open Lounge, all of whom are currently members of Church Council.

### 2. Procedures

#### 2.1 Distribution of the Policy

A copy of this policy and its procedures will be distributed to:

- the Open Lounge coordinator and the Office Administrator(s) who oversee the Open Lounge volunteers on a day-to-day basis
- the co-coordinators of Sunday Night Tea
- all Sunday Night Tea volunteer security personnel
- all Sunday Night Tea Team Leaders
- the coordinator of the Sunday Night Tea roster

#### 2.2 Implementing the Policy

The above mentioned staff and volunteers will be responsible for explaining the policy to persons who wish to bring approved Assistance Animals or other support animals into areas of Pilgrim where food is provided. The emphasis must be on not allowing any kind of assistance animal near where food is being handled (i.e. being served).

#### 2.3 Arrangements to cater for persons accompanied by Assistance Animals

The above mentioned staff and volunteers will suggest and facilitate arrangements to cater for persons who wish to have assistance animals accompany them when they visit Pilgrim to receive food hospitality.

- Approved Assistance Animals may accompany their owners into the Lounge or Hall provided that the animals stay well away from the area where food is being served (i.e. these visitors will need to be assisted to find an appropriate seated area for them and their assistance animal and food needs to be taken to them if they are unable to access the serving area without their assistance animal).
- Visitors with unapproved support animals may not take these animals into either the Lounge or the Hall. If they are unwilling to leave their unapproved support animals outside, these visitors can be provided with food outside in a sheltered area. They may even be provided with a table in an area that is both sheltered and safe for them and their support animals.

#### Authorisation

Chair of Operations Committee:



Date of approval: 11 February 2020

Review date: February 2022

## APPENDIX TO FOOD SAFETY AND ASSISTANCE ANIMALS POLICY

The Sunday Night Tea (SNT) program, coordinated by Pilgrim Uniting Church and supported by community and church volunteers, provides free meals on Sunday evenings to homeless and disadvantaged people. In summer, salads are prepared at home by volunteers and brought in, with the addition of cold meats and bread, fruit and cake. In winter, soup is prepared by volunteers at home, with the addition of bread, fruit and cake. Food is also prepared and plated up in the kitchen, and served from open platters and bowls on tables in the hall area directly adjacent to the tables where people eat.

### **Food Safety Legislation**

Food Standards Australia and New Zealand is the government agency which controls the Food Standards Code which all food handling businesses must comply with. A charity or a non-profit community group that is selling or handling food is considered to be a food business under the Food Act 2006, and as such is required to meet food safety standards. The only situation in relation to non-profit organisations, when compliance with the Act is NOT required, is when a person handles food at their own home, with the intention to give it away to a non-profit organisation, for that organisation to sell or give away.

Under the provision of the Food Act SA, if no money is being collected for the service, volunteers are not required to have the same training and knowledge as food businesses. The only requirement in SA is that the donated food must be safe to consume. If all food for distribution is packaged, SA Health would consider it low risk and the presence of an assistance dog to be acceptable. However, if there is any type of food preparation and/or exposed foods, animals should not be permitted inside. *(Advice on 8th January 2020 from Niamh Connolly)*

Standard 3.2.2 (Food Safety Practices and General Requirements) states that Assistance Animals cannot be refused entry without reasonable cause and must be allowed in customer accessed areas, but are not allowed near any food preparation area.

The Sunday Night Tea program operates on the basis that in preparing and handling food for distribution to the public, practices should be compliant with existing Standards for Food Safety Practices. This includes animals (including dogs) not being allowed inside where food is being handled and people are eating, with the exception of accredited Assistance Animals (wearing a jacket or harness that clearly identifies them as assistance dogs, or where the owner has an identification card issued by the Dog and Cat Management Board). Companion dogs that have a current approved 'public access test' are also able to access public spaces but not food preparation areas.

### **Advice sought from:**

Adelaide City Council Environmental Health Officer, Eleni Kokkoni  
SA Health Acting Senior Policy Officer, Food Standards Surveillance, Niamh Connolly  
Assistance Dogs Australia  
Dog and Cat Management Board SA

### **Assistance Animals**

Assistance Animal Public Access Rights are protected under federal law through the *Disability Discrimination Act 1992*, Section 9.

Assistance Animals are accredited under a law of a State or Territory that provides for the accreditation of animals trained to assist a person with a disability to alleviate the effect of that disability; OR accredited by an animal training organisation prescribed by the Commonwealth; OR trained to assist a person with a disability to alleviate the effect of that disability, AND trained to meet standards of hygiene and behaviour appropriate for an animal in a public place. These Assistance Animals are not pets. They provide an important service that helps people to more fully participate in personal and public life activities with more confidence and independence.

There are now a wide range of different categories of assistance animals, most of them dogs (e.g. Guide Dogs, PTSD Service Dogs for former Australian Defence Force or Police personnel diagnosed with PTSD, Companion Dogs which pass an annual 'public access test' or PAT, mindDogs to assist those with mental health problems, and Therapy Dogs).

All owners of accredited Assistance Animals carry some form of identification of both the owner and the animal, and often assistance animals wear a jacket or harness which identifies them as such. For example, in SA the owners of assistance dogs accredited by the Dog and Cat Management Board carry a credit card sized identification card which has a photo of the dog and the owner, and people who receive a PTSD Service Dog are provided with a photographic identity badge as proof of Service Dog status, which they must take with them in public, and a Service Dog jacket for the dog.

Pet dogs may be allowed (only) in outdoor dining areas (new health regulations October 2012) at the discretion of the business. It is up to the food business whether or not they permit customers to have their dogs in outdoor dining areas and under what conditions (e.g. they may require that dogs are to be kept on the ground and leashed). Animals other than dogs or assistance animals are not permitted in outdoor dining areas.

### **References**

Section 9 of the Disability Discrimination Act 1992

Safe Food Australia Food Safety Standards

<https://www.foodstandards.gov.au/foodsafety/standards/Pages/Animals.aspx>

<https://www.olg.nsw.gov.au/public/dogs-and-cats/information-for-the-community/assistance-animals>

