

Who Needs a Food Handling Certificate? – Complete Hospitality Training

Canonical: <https://cht.edu.au/news/who-needs-a-food-handling-certificate/>

Details:

Under clause 3.2.2A—10 of the Australia New Zealand Food Standards Code, a food business must ensure that each food handler who engages in a prescribed activity has completed food safety training before engaging in that activity — or that the handler possesses skills and knowledge of food safety and hygiene commensurate with that activity.

That second limb is doing real work, and it is not the limb most course pages name.

But before Standard 3.2.2A there was a broader duty, and it still applies. Anyone trying to work out whether this page is about them needs both layers, because a business can be entirely outside Standard 3.2.2A and still owe a training obligation.

The layer almost every page misses: clause 3

Clause 3 of Standard 3.2.2 has applied to every Australian food business since 2000. It requires a food business to ensure that persons undertaking or supervising food handling operations have:

skills in food safety and food hygiene matters, and

knowledge of food safety and food hygiene matters,

commensurate with their work activities .

Four things are worth reading carefully in that clause.

It is outcome-based. It names no course, no certificate, no unit code and no refresher period. The test is whether the person is actually competent for what they do.

It reaches supervisors expressly. A manager who never touches food but directs food handling operations is inside clause 3.

It applies to every food business, not just categories one and two. That is the part that catches people. Standard 3.2.2A, which commenced on 8 December 2023 , added a prescriptive layer on top of clause 3 — the three food safety management tools, at clauses —10 (handler training), —11 (the supervisor) and —12 (substantiation records) — and it applies only to category one and category two businesses. It did not change clause 3. So "we are not category one or two" answers the question about the tools and does not answer the question about training.

"Commensurate with their work activities" scales. A person who only slices bread and a person who cooks and cools bulk stock owe different levels of competence, and the clause says so.

Standard 3.2.2 also gives the business a related duty at clause 18 : it must inform all food handlers of their health and hygiene obligations under the health and hygiene subdivision. Telling people the rules is itself a requirement, not a courtesy.

The alternative is competence, not supervision

A lot of material — including older CHT pages — describes the rule as "trained or supervised by someone who has been ". That framing predates Standard 3.2.2A.

Under 3.2.2A's food handler training tool, the alternative to completing a course is possessing commensurate skills and knowledge , not being supervised by a trained colleague. The distinction matters in practice:

An experienced chef who has never sat a course may well possess commensurate skills and knowledge. That is a genuine answer to the requirement.

A brand-new kitchen hand on their first shift does not, and pointing at a trained supervisor standing nearby is not the alternative the standard offers for the training tool.

Supervision does appear in Standard 3.2.2A — but in the Food Safety Supervisor tool, where the FSS must be reasonably available to advise and supervise food handlers. That is a separate obligation running alongside handler training, not a substitute for it.

The practical reading: train people before they start, or be able to explain what skills and knowledge they already have and why those are commensurate with the specific activity.

What counts as a "prescribed activity"

The Standard 3.2.2A duty attaches to prescribed activities, which are the handling by the business of any unpackaged potentially hazardous food that is either:

used in preparing ready-to-eat food to be served to a consumer, or

itself ready-to-eat food intended for retail sale by that business

So the question is not whether someone works in a kitchen. It is whether they touch unpackaged, potentially hazardous or ready-to-eat food. And because the same definition is the trigger for all three tools, the day of the first prescribed activity is the day the training, the supervisor and — for category one — the records all have to be in place.

Who is a food handler

A food handler is anyone who directly engages in the handling of food, or who handles surfaces likely to come into contact with food. That is broader than the kitchen:

chefs, cooks, kitchen hands

waiters and food and beverage attendants plating or carrying unpackaged food

baristas handling milk, garnishes and unwrapped items

bar staff handling ice, fruit and unpackaged garnishes

anyone washing and putting away food-contact equipment

It generally does not extend to someone handling only sealed, prepackaged goods.

Food handlers also owe duties personally

Worth knowing, because handler training is often discussed as purely a business obligation. Standard 3.2.2 places duties on the individual as well:

| Clause | What the food handler must do | | --- | --- | | 14 | Report symptoms, foodborne disease or carriage of a foodborne disease to their supervisor ; not handle food where contamination is reasonably likely; and notify a supervisor if they know or suspect they have contaminated food | | 15 | Wash hands whenever hands are likely to be a source of contamination — including immediately before working with ready-to-eat food after handling raw food , and immediately after using the toilet — at the provided

facilities, using soap or other effective means and warm running water , dried on a single-use towel or another method not likely to transfer pathogens |

Those two clauses are the practical content of most food handler training, and they are the reason SITXFSA005 assesses hand-washing by demonstration rather than by question.

The business carries the matching duties: under clause 16 it must exclude a person known to be suffering from or carrying a foodborne disease from handling food where contamination is reasonably likely, and such a person may only be readmitted on medical advice . Under clause 17 hand-washing facilities must be easily accessible with warm running water and soap at or near each one, and must be used only for washing hands, arms and face.

Which businesses the prescriptive tools apply to

Both categories are caught by the handler training requirement. The categories are defined by what the business does , not by who it serves — a point commonly got wrong.

Category one is a caterer or food service operation that processes unpackaged potentially hazardous food into food that is both potentially hazardous and ready to eat. That is restaurants, cafes, pubs, fast food outlets and takeaways, bakeries, hospitals, aged care facilities, childcare centres, school canteens, family day care, mobile food vendors, market stalls, and any service station, supermarket or deli that makes and serves food. In practice: if you have a kitchen and you cook, you are category one.

Category two is retail sale of food that is potentially hazardous and ready to eat, received unpackaged or unpackaged after receipt, and not made or processed by the business — with slicing, weighing, repacking, reheating and hot-holding expressly not counting as processing. Delicatessens, butchers, seafood retailers, some supermarkets and service stations, convenience stores.

Both need trained handlers and a Food Safety Supervisor. Only category one additionally carries the substantiation records duty at clause —12 — eight practice areas, kept three months, accessible at the premises. That single clause is the whole difference in obligation between the two categories. See how long do I need to keep records for .

How that translates into a duty depends on your state:

| | The trigger | | --- | --- | | Victoria | Premises class under s 19C — Class 1, most Class 2, Class 3A | | New South Wales | The food itself under s 106A — ready-to-eat, potentially hazardous, not prepackaged | | Queensland | Holding a food business licence under s 86 — broader than Standard 3.2.2A | | Western Australia | Category one or two, Standard 3.2.2A verbatim |

The Queensland row is worth unpacking, because it is the one that catches organisations the Code would let go. A licensable food business under the Food Act 2006 is one that involves the manufacture of food ; or is carried on by an entity other than a non-profit and involves the retail sale of unpackaged food ; or is carried on by a non-profit and involves the sale, on at least 12 days each financial year , of meals prepared by the organisation at a particular place. So a community group that runs a monthly meal service is inside Queensland's licensing net — and therefore inside the supervisor requirement — even though the Code's fundraising exemption would otherwise have released it.

There is also a notification duty that exists independently of all of this. Under clause 4 of Standard 3.2.2 a food business must notify the appropriate enforcement agency before commencing food handling operations , giving contact details and the proprietor's business address, the nature of the business, and the location of all food premises within that agency's jurisdiction. Changes must be notified before they occur . New operators frequently discover this obligation after opening.

Who does not need it

Worth stating, because over-training is a real cost — but each of these exemptions is narrower than it sounds.

People handling only sealed prepackaged goods. Stacking wrapped sandwiches is not handling unpackaged food.

Fundraising events — but read both exemptions. These are two different provisions and they do different amounts of work:

| | Standard 3.2.2A | Standard 3.2.2, clause 2 | | --- | --- | --- | | Scope of relief | Complete — the standard does not apply to handling food for or at a fundraising event, including the handler training and Food Safety Supervisor tools | Narrower — food handlers are relieved of the clause 3 baseline skills-and-knowledge requirement | | Conditions | None beyond qualifying as a fundraising event | Only where the food sold is not potentially hazardous , or is to be consumed immediately after thorough cooking |

A fundraising event is defined in the Food Standards Code as an event that raises funds solely for a community or charitable cause and not for personal financial gain.

The practical consequence is the bit to take away: qualifying as a fundraising event takes you outside Standard 3.2.2A entirely, but it does not automatically take you outside clause 3. Clause 3 relief needs the extra condition about the food. A charity stall selling pre-made potentially hazardous food that is not cooked thoroughly immediately before eating is exempt from the 3.2.2A tools and still owes the clause 3 duty.

And state law can bite on a different trigger. In Queensland a non-profit is caught once it sells prepared meals on 12 or more days in a financial year, because Queensland's trigger is the licence rather than the category.

Victorian Class 3 and Class 4 premises do not require a Food Safety Supervisor, though the proprietor must still ensure staff have the skills and knowledge for their roles — which is clause 3 again. Class 4 premises only notify council rather than register. Class 3 covers unpackaged low-risk food, warehousing and distribution of prepackaged food, shell eggs, and community-group cooked ready-to-eat food made on site, mostly by volunteers, for a maximum of two consecutive days .

Victorian premises using a quality assurance food safety program that includes competency-based or accredited training for staff are exempt from the supervisor requirement under s 19GA(2) . Note the condition: the training element is part of the exemption, not an optional extra, so this is not a route out of training as such.

Businesses that handle no unpackaged potentially hazardous ready-to-eat food at all are outside Standard 3.2.2A's tools — and still inside clause 3 to the extent they handle food at all.

What the training has to cover

If you take the course route, the training must include:

Safe handling of food

Food contamination

Cleaning and sanitising of food premises and equipment

Personal hygiene

Three things follow that surprise people:

It does not have to be accredited , and no unit code is required. A free, non-accredited course covering those four topics satisfies Standard 3.2.2A. National VET accreditation is not required for handler training — only the supervisor needs a certificate from an RTO or a state-recognised organisation.

There is no mandated refresher period. The standard sets no expiry. The continuing duty is on the business to ensure handlers' skills and knowledge remain adequate and up to date — which is clause 3's present-tense test.

Records are optional. The standard does not require the business to keep records of handler training. Many do anyway, because it is the simplest way to show the training happened before the activity started.

Prior learning may be recognised for the purposes of the duty, and the recognised routes are wider than most operators assume: competency-based training, in-house education, a food safety induction completed at another food business, or relevant previous industry experience in the food industry.

But check your sector before you book anything

One dimension that the "who needs it" question usually leaves out, and it decides which units, not just whether.

Safe Food Victoria and Queensland Health both publish minimum competency standards by food sector, and they are not the same units:

| Sector | Published minimum | | --- | --- | | Hospitality — restaurants, cafes, hotels | SITXFSA005 + SITXFSA006, or SIRRFA001 in Victoria | | Retail — supermarkets, convenience stores, delicatessens | SIRRFA001, or both hospitality units | | Health — hospitals | HLTFS001 + HLTFS005 + HLTFS007, Release 1 of each | | Community services — childcare centres, nursing homes, Meals on Wheels | all three health units | | Food processing — manufacturers, mills, canneries, bakers, breweries, wineries | FBPF002, or FBPF010 in Queensland |

Four points of precision, because this is commonly misstated:

Standard 3.2.2A names no sector units at all. Every entry is a state determination.

The health and community services settings are precisely Victoria's Class 1 premises, so in Victoria the sector requirement and the highest-risk class coincide.

New South Wales names no sector-specific units of its own, and Western Australia publishes HLTSS00061 — the same three HLTFS001 units bundled as a skill set — as an accepted equivalent rather than a mandate.

Of the three health units, only HLTFS001 is on our scope. HLTFS005, HLTFS007 and FBPF002 are not. So a hospital, aged care, childcare or food processing business needs a provider whose scope carries all the units its sector requires — check it on training.gov.au for any provider, including this one.

Safe Food Victoria also confirms there is no Victorian requirement to train beyond the minimum competencies listed, so an upsell pitched as Victorian compliance is not one.

The unit you need, if you want the accredited version

For hospitality, the food handler unit is SITXFSA005 Use hygienic practices for food safety, packaged as the SITSS00068 Food Handling skill set. Food retail uses SIRRFA001 — noting that it carries an end date of 28 June 2024 on our scope, so it is a unit people hold rather than one we enrol anyone in today.

Completing it produces a Statement of Attainment, which does not expire and stays linked to your Unique Student Identifier. That is what accreditation buys: a portable, verifiable record on your national training transcript that credit-transfers into a qualification later. SITXFSA005 is a core unit in SIT30722 Certificate III in Hospitality (Restaurant Front of House) and one of two options in the compulsory Group A of SIT40422 Certificate IV in Hospitality. Both it and SITXFSA006, and both skill sets, have been on our scope since 10 June 2022.

It also gates nine food and beverage units. The national register lists SITXFSA005 as a prerequisite for SITHFAB022 (clean and tidy bar areas), SITHFAB023 (operate a bar), SITHFAB024 (non-alcoholic beverages), SITHFAB025 (espresso coffee), SITHFAB026 (room service), SITHFAB027 (serve food and beverage), SITHFAB030 (cocktails), SITHFAB034 (table service) and SITHFAB035 (silver service). Keep that figure of nine attached to the food and beverage stream: the same unit also stands in front of cookery, patisserie and kitchen units elsewhere in the SIT package, which is a different set and a different number. RSA reaches just as far inside the stream — SITHFAB021 is a prerequisite to nine units of its own, SITHFAB023, SITHFAB029, SITHFAB030, SITHFAB031, SITHFAB032, SITHFAB033, SITHFAB034, SITHFAB037 and SITHFAB039 — so the two gate the same number of units, and four units in the stream carry no prerequisite at all: SITHFAB021, SITHFAB028, SITHFAB036 and SITHFAB038. SITHFAB034 is one of four units in that stream carrying two or more prerequisites: SITHFAB023 Operate a bar carries the same pair of two, SITHFAB030 Prepare and serve cocktails carries three by adding SITHFAB023, and SITHFAB039 Manage the sale or service of wine carries three of its own in SITHFAB021, SITHFAB032 and SITHFAB033. On SITHFAB034 the second prerequisite is RSA SITHFAB021, an academic prerequisite that applies regardless of the venue's licence or the state liquor regime. So anyone planning to work up through table service needs both, in order — and anyone aiming at cocktails or wine service needs a chain rather than a pair, since those two sit three and four units deep. See restaurant waiting.

The unit is assessed by demonstration, not by quiz. Its performance evidence requires each of the following on at least three occasions: correct hand-washing; appropriate use of uniform and personal protective equipment; effective personal health and hygiene practices; and hygienic food service — plus the procedures to report unsafe hygiene practices.

This is food handler training only. It does not make you a Food Safety Supervisor in any Australian state — that role additionally requires SITXFSA006, which assesses hazard control at nine critical control points, temperature probe calibration and contamination incident reporting. The difference between the two skill sets is exactly that one unit, and they are constantly confused. The consequences fall on the business.

Separately: the business needs a Food Safety Supervisor

Beyond trained handlers, a category one or two business must appoint a certified FSS before engaging in a prescribed activity, whose certificate was issued within the preceding five years — the test sits in the definitions clause —2 — and who is reasonably available, on site or genuinely contactable, to advise and supervise.

One piece of drafting explains why the state overlay below exists at all. Standard 3.2.2A defines a food safety supervisor certificate as certification by either (a) a registered training organisation or (b) an organisation recognised by the relevant authority under that state's own Act. New South Wales is the only state that has exercised limb (b); Victoria, Queensland and Western Australia rely on limb (a), which is why there the Statement of Attainment is the whole artefact.

And in Victoria there is a prior question about who can be nominated, not only what they hold. Section 19G of the Food Act 1984 sets three tests, all required: knowing how to recognise, prevent and alleviate the hazards at those premises; having met a food safety competency standard approved in writing by Safe Food Victoria or an equivalent body; and having the ability and the authority to supervise other people handling food. The certificate answers only the middle test, so nominating a junior casual because they were free to attend the course does not produce a valid supervisor. Section 19GA(3) expressly allows the proprietor to hold the role, which is often the simplest answer for a small venue.

The state overlay matters here more than anywhere else:

New South Wales requires a state-issued FSS certificate from a provider approved by the NSW Food Authority under Food Act 2003 s 106H, kept on the premises under s 106G, with a maximum penalty of 25 penalty units for an individual and 50 for a corporation; the appointment duty itself carries 50 and 100 penalty units, with a narrow defence covering not more than 30 days while a replacement is appointed. One person cannot be the FSS for more than one premises there — s 106B(1)(b) is a statutory bar. We are not on that approved provider list.

Victoria has no state certificate, but under Food Act 1984 s 19GB the proprietor must give the council written details of the current supervisor's name and qualifications within 7 days of a written request. One person may cover several premises if each relevant council is satisfied, and each council separately where they sit in different municipalities. And note the sanction: no monetary penalty attaches to s 19GA, the duty to have a supervisor at all — the consequence is refusal of registration or renewal, or revocation or suspension of the premises' registration. That is the larger exposure, not the smaller one.

Queensland requires the licensee under s 86 to have a supervisor within 30 days of the licence issuing and continuously thereafter, at up to 50 penalty units; and under s 88 to tell the licensing local government the name and contact details of each food safety supervisor — within 30 days of the licence being issued, and within 14 days after a person becomes an FSS, stops being one, or changes their contact details. Maximum 50 penalty units for each breach. Under s 87 the FSS must be reasonably available to be contacted by both the local government and the people who handle food in the business.

Western Australia applies Standard 3.2.2A as written and names SITSS00069 by code. Its published provider list is a convenience listing of self-notified RTOs, not an approval register, so a claim to be "WA-approved" describes a scheme that does not exist.

Penalty unit values are indexed annually, so confirm current amounts with the regulator rather than converting them to dollars.

See what food safety certificate do I need to work out which of the two applies to you, and Food Safety Supervisor certificate for the role in detail.

Where to get trained

We hold SITSS00068 Food Handling on our scope of registration.

Food handling course

Virtual food handling SITXFSA005 — the same unit, the same Statement of Attainment

Food Safety Supervisor — the SITSS00069 skill set, if you need the supervisor level

About us

We are Complete Hospitality Training, RTO 3722, CRICOS 04242E. Level 3, 28 Elizabeth Street, Melbourne VIC 3000, and 410 Elizabeth Street, Surry Hills NSW 2010. Contact melbourne@cht.edu.au or +61 3 9654 1554.

Registered since 1 June 1994; current registration to 30 June 2032. Scope covers 17 qualifications, 81 skill sets and 579 units, all at the extent "Deliver and assess", verifiable on training.gov.au. SITSS00068 and SITSS00069 have been on it since 10 June 2022. Two limits stated plainly: we are not approved by the NSW Food Authority and cannot issue the NSW FSS certificate; and of the health sector units only HLTFSE001 is on our scope.

See also what is a food handling certificate, who needs a food handling certificate in Victoria, Standard 3.2.2A explained and all courses.

We link to the relevant course and regulatory sources in this guide. Check those sources for current requirements, and confirm course availability, delivery, fees and entry requirements with us before enrolling.

Does every single staff member need the certificate?

Everyone doing a prescribed activity needs either completed training or commensurate skills and knowledge. Most businesses train everyone, because "commensurate skills and knowledge" is a judgement you have to be able to defend and training is simply easier to show.

Can an untrained person work under supervision instead?

Not as the stated alternative under the training tool. Standard 3.2.2A offers completed training or commensurate skills and knowledge. Supervision belongs to the separate Food Safety Supervisor obligation. Older guidance describing "trained or supervised" predates 3.2.2A, which commenced 8 December 2023.

We are not category one or two. Are we off the hook?

Only for the three prescriptive tools. Clause 3 of Standard 3.2.2 still requires skills and knowledge commensurate with work activities for anyone undertaking or supervising food handling, and it has since 2000.

Do managers who never touch food need training?

Clause 3 expressly covers people supervising food handling operations, so a manager directing the kitchen is inside it. Whether they need the accredited unit is a separate, practical question.

Do bar staff need it?

If they handle unpackaged garnishes, fruit or ice, they are handling food. It is also the prerequisite for the bar units themselves: SITHFAB022 and SITHFAB023 both require it, and SITHFAB023 and SITHFAB030 require RSA as well. Bar staff separately need RSA before serving alcohol — see RSA in Australia ([/rsa/](#)).

Do baristas need it?

If they handle milk, unwrapped items or garnishes, yes. Note also that SITXFSA005 is a prerequisite for the espresso unit SITHFAB025. See barista coffee course ([/courses/barista-coffee-course/](#)).

Do volunteers at a charity stall need it?

Standard 3.2.2A does not apply at a qualifying fundraising event at all. The narrower clause 2 exemption from Standard 3.2.2 only applies where the food is not potentially hazardous, or is eaten immediately after thorough cooking — so a stall selling pre-made potentially hazardous food can be outside 3.2.2A and still inside clause 3. Queensland also catches a non-profit selling prepared meals on 12 or more days in a financial year, because that makes it a licensable food business.

What is a fundraising event, exactly?

The Code defines it as an event that raises funds solely for a community or charitable cause and not for personal financial gain.

Do I need it if I only handle packaged food?

Generally no. The Standard 3.2.2A duty attaches to handling unpackaged potentially hazardous food or ready-to-eat food for retail sale.

Does it have to be a nationally recognised course?

No, and no unit code is required. A non-accredited course covering the four required topics satisfies the law. The accredited unit gives you portability, transcript evidence and prerequisite value rather than extra compliance — and within the food and beverage stream that prerequisite value runs to nine units.

I work in aged care or childcare. Is this the right course?

As a handler it will do. As the supervisor, no — Safe Food Victoria and Queensland Health publish HLTFS001, HLTFS005 and HLTFS007 for that sector, and those settings are Class 1 premises in Victoria. Only HLTFS001 is on our scope, so use a provider that holds all three.

Who can actually be nominated as the supervisor in Victoria?

Someone who satisfies all three limbs of s 19G — hazard knowledge for those premises, an approved competency standard, and the ability and authority to supervise. Section 19GA(3) expressly permits the proprietor.

Is it valid in another state?

Yes at handler level — it is a nationally recognised unit, and no state runs its own handler scheme. Supervisor-level requirements differ by state, and NSW does not recognise an interstate FSS certificate, because it is the only state to have used the national standard's second limb to build its own scheme.

Does it expire?

No, and Standard 3.2.2A mandates no refresher period for handlers. The five-year clock belongs to the FSS certificate, in clause 3.2.2A—2.

Do we have to keep records of who is trained?

Standard 3.2.2A does not require it. Keeping them is the easiest way to demonstrate the training happened before the activity began, and to answer a council request inside a statutory window.

Do I have to tell my employer if I am unwell?

Yes — clause 14 of Standard 3.2.2 puts that duty on the handler personally. The business must then exclude you from food handling where contamination is reasonably likely, and may readmit you only on medical advice.

We are a deli — does any of this apply?

Yes. A deli is typically category two, so trained handlers and an FSS are both required. What you avoid is the category one records obligation at clause —12.

What is the penalty if we get the supervisor wrong?

It depends where you are. NSW: up to 50 penalty units for an individual and 100 for a corporation. Queensland: up to 50 under s 86. Victoria: no monetary penalty at all — the sanction is refusal, revocation or suspension of the premises' registration, which is a larger commercial exposure rather than a smaller one.

We are opening a new venue. What do we do first?

Notify the enforcement agency before you start handling food, under clause 4 of Standard 3.2.2, and notify any change before it happens. Then register or notify with your council according to your premises class, and have the handler training and the supervisor in place before the first prescribed activity rather than before the first inspection.