

## Food Allergen Management Policy

### 1. Statement of Intent

Edsential takes its responsibilities for providing high quality food, that is safe to eat, very seriously.

The business is committed to managing the risks with regards to the provision of food and the consumption of allergens and intolerances which could lead to an allergic reaction. This includes following all the statutory guidance and best practices published by the Food Standards Agency, the Department for Education (DfE) and Local Authorities.

The business understands that the successful implementation of this policy requires teamwork and the commitment and support of parents, education establishments, Edsential HQ and our Catering Teams. For further information regarding responsibilities please see **Appendix 1, Responsibility Chart – Food Allergen Management.**

### 2. Arrangements and Procedures

To ensure all our foods are safe to eat, we will:

2.1 Work closely with our customers to assist and support them with known food allergies and intolerances, including meeting with education establishments and parents and guardians, if requested/appropriate.

2.2 Work with education establishments to make the relevant information available to parents and guardians of customers who have known food allergies and intolerances.

2.3 Work closely with our approved suppliers to ensure accurate and timely information is provided for all products that may contain allergens.

2.4 Maintain a database of all our recipes, clearly listing ingredients and highlighting those that contain the 14 allergens listed by the Food Standards Agency.

2.5 Display Edsential Food Allergen and Intolerances Notices to prompt and encourage our customers to ask about allergens and intolerances in the foods being served to them.

2.6 Provide our Catering Teams with access via Cypad (Kitchen Management System) to an Allergen Matrix which is updated as information changes from our suppliers or our menus change.

2.7 Ensure all catering staff are trained in managing allergens and intolerances, as appropriate for their job role. All staff complete the Food Standards Agency training and pass the exam. Catering Supervisors receive additional online training to assist in the management of medical diets.

2.8 Ensure good hygiene practices are followed in our kitchens, in accordance with Edsential's Food Safety Management System, to reduce the risk of cross contamination.

2.9 Provide a template Pupil Medical Sheet for those requiring medical diets to maintain relevant customer allergen and intolerance details that can be shared with our Catering Teams.

2.10 Monitor and audit our operations to ensure our arrangements and procedures are working effectively and are as robust as possible.

### **3. Risk Assessments**

3.1 We treat all our customers as individuals and try to avoid, so far as reasonably practicable, generic allergen-free diets for all, as these can be unrealistic and can have a negative impact on the variety of dishes available for the whole school. If a school wishes to remove a particular allergen or ingredient from the whole school menu we will discuss and agree this on an individual establishment basis.

3.2 We make reasonable adjustments to cater for all customers' medical needs. In doing this, we acknowledge that some requests for medical diets can be complex and we will evaluate each application using a risk assessed basis.

3.3 In exceptional and complex circumstances, where a risk assessment indicates that food cannot be reasonably produced which would be safe for a customer to eat, we reserve the right to decline the request for a medical diet.

### **4. Fail Safe Meal**

4.1 Where our processes cannot be confirmed, our Catering Teams are directed to provide a fail-safe meal. Our fail-safe meal consists of jacket potato, a suitable approved topping, a suitable approved side salad, a piece of fresh fruit (apple) and a glass of water.

### **5. School Management Plan at the Servery**

5.1 Dining halls and food serveries are busy places and our Catering Teams cannot be reasonably expected to recognise all customers requiring medical diets. We require schools to develop a documented school management plan for the safe identification and handover of meals to customers for use on every occasion.

#### **In Primary/Special education establishments**

The supervision and identification of pupils at the servery is the responsibility of the school. We require schools to provide our Catering Teams with a documented plan for the identification and supervision of those requiring medical diets at the servery. This plan should be used on every occasion and reviewed at least annually or when there are significant changes.

#### **In our residential centres**

In our residential centres we require notification of allergen information in advance, in accordance with our bookings policy.

The supervision and identification of customers being served is the responsibility of the visiting party. Those requiring medical diets must be served first and must be clearly identified to the Catering Team along with their medical diets on every occasion.

#### **In Secondary education establishments**

In Secondary Schools, where students may have more personal responsibility for self-managing their medical conditions, we will work with the pupil and the establishment in accordance with local school policies and individual health care plans to support food requirements. In all instances, the catering arrangements will continue to be provided in

accordance with DfE guidance 'Supporting Pupils with Medical Conditions at School', DfE Allergy Guidance for Schools and Food Standards Agency Allergen Guidance for Institutional Caterers. check

The school catering team will work in partnership with students to devise menus and food choices suitable for their specific allergen or dietary requirement daily, and all students will be catered for. The maximum specific allergen diet turnaround, following notice of requirement in a secondary school would be 1 days' notice.

5.2 Best practices at the servery/counter do not rely on photographic identification alone and must include other robust means of identification e.g. those requiring medical diets should come to the servery first, wear identification lanyards or badges and/or be accompanied by a member of school staff with responsibility for identifying them to catering team. Catering staff will work with the school and follow the agreed plan.

## 6. Cultural and Religious Diets and Life-style Choices

6.1 In addition to this policy, Edsential makes reasonable adjustments for customers with other non-medical requirements, to reflect most cultural and religious diets along with other life-style choices, in accordance with local school policies.

## 7. Natasha's Law/Packed lunches

7.1 Below details what we do to ensure we meet the legal requirements. Please refer to **Appendix 2 Natasha's Law**.

### Primary and Special Schools

We have a pre-order form for education establishments to pre order packed lunches at least a week in advance of a school trip, that negates the need for our Catering Teams to individually label the food with a full list of ingredients with allergenic ingredients emphasised. Please refer to **Appendix 3 Packed Lunch Pre-Ordering Form**.

Customers attending our **residential centres** are required to inform us in advance of any allergies and intolerances and to pre-order packed lunches as part of our booking process.

## 8. Dispatch

8.1 **(Primary and Special Schools)** Any meals that are served away from our main service counters e.g. classrooms will be individually, securely wrapped and labelled with the pupil/staff members name and medical diet.

8.2 In our Residential Centre's we require notification of allergen information in advance, and in accordance with our bookings policy. Packed lunches will be prepared and individually labelled with the customer's name and medical diet.

## 9. General Data Protection Regulations (GDPR)

9.1 To fulfil our roles and responsibilities regarding the management of medical diets we are required to process and store data such as medical information. All our data handling is undertaken in accordance with all current GDPR requirements.

## 10. When Things Go Wrong

10.1 We expect all incidents involving allergens and intolerances to be reported to us in a timely manner. Our Prime accident/incident reporting system can be accessed via our kitchen Cypad or directly by following the link [Report a food incident](#)

10.2 We will investigate and follow up every reported event, in a timely and proportionate manner.

10.3 We will follow all recommended Food Standards Agency guidance on what to do when things go wrong: [Allergen guidance for food businesses | Food Standards Agency](#)

## 11. Monitoring and Review Arrangements

11.1 Credible benchmarking and comparisons of performance and best practice standards will be sought, where appropriate. Comparisons are undertaken with a view to continual improvement and keeping abreast with industry good practice and recognised national guidance.

11.2 As part of our commitment to continuously monitor, review and improve our arrangements, this policy will be reviewed on a regular basis. The company will take into consideration changes in statutory requirements, changes in industry good practice and the views, opinions and experience of its employees and anyone else that is involved in, or affected by, its work activities.

## 12. References

12.1 Government resources:

[Allergy guidance for schools - GOV.UK \(www.gov.uk\)](#)

[Allergen guidance for food businesses | Food Standards Agency](#)

12.2 Edsential Prime accident/incident reporting system

[www.primesafety.net/cwacedsentialuni](http://www.primesafety.net/cwacedsentialuni)

### Document Control

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|------------------|--|
| Issue:           | 2  |
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| Written by:      | Tracy Moore, Head of Catering<br>Helen Tomassen, H&S Adviser |
| Approved by:     | Edsential Senior Leadership Team                             |
| Date for Review: | August 2025  |

## APPENDIX 1 - Responsibility Chart – Food Allergen Management

### PARENTS / CARERS

#### 1 Notification of allergy or intolerance

Inform school as soon as possible and provide school with a formal medical information.

#### 2 On-going communications

Advise the school of any change in writing. Parents should not contact the kitchen directly.

#### 3 Implementation of medical diet

Acknowledge that if process is not followed a Fail-Safe Meal\* will be served.

### EDUCATION SETTING

#### 1 Notification of allergy or intolerance

Share medical information with Edsential HQ via [allergensandintolerances@edsential.co.uk](mailto:allergensandintolerances@edsential.co.uk) allowing 7 working days to process.

#### 2 On-going communications

Maintain allergen data for all pupils. Keep Edsential HQ up to date of any changes in writing.

#### 3 Implementation of medical diet

For complex diets, liaise with parents as requested by Edsential HQ. Update pupil medical sheet with current photo of the pupils (re-issue annually) and share with kitchen.

#### 4 Management of medical diet

Develop and agree with Edsential HQ a documented School Management Plan for the identification and handover of meals to pupils for use on every occasion. A photograph cannot be the only means of ID. School lunchtime staff to be trained in this plan. If the process cannot be followed, a Fail-Safe Meal\* will be served.

### EDSENTIAL HQ

#### 1 Notification of allergy or intolerance

Receive requests for medical diets from schools. Process within 7 working days.

#### 2 On-going communications

Develop medical diet in accordance with medical information. Review when advised in writing and when menus change.

#### 3 Implementation of medical diet

Provide medical diet and supporting notes to kitchen and share with parents and school if applicable. For complex diets undertake RA if appropriate.

#### 4 Management of medical diet

Fail Safe Meal\* will be served if no medical information is provided. No substitutes in medical diet meals other than those provided by Edsential approved suppliers. Continued management of approved food supplies and the allergen matrix.

### KITCHENS

#### 1 Notification of allergy or intolerance

Follow initial instruction as per email from Edsential HQ.

#### 2 On-going communications

Follow instructions regarding the medical diets provided by Edsential HQ. Do not communicate with parents directly - the school should liaise with Parent/Edsential HQ.

#### 3 Implementation of medical diet

Understand the medical diet and supporting notes and take ownership. Report any concerns to Edsential HQ. Sign off pupil medical sheet and complete the form on Cypad. Pupil medical sheet to be made available to all kitchen staff.

#### 4 Management of medical diet

Follow Kitchen Procedures - Food Allergen Management. Prepare medical meals in accordance with pupil medical sheet. NB No substitutes in medical diet meals other than those provided by Edsential HQ approved suppliers. A Fail-Safe Meal\* should be served if the procedures cannot be followed. Understand the School Management Plan for the handover of meal to pupils for use on every occasion. A photograph cannot be the only means of ID. All Kitchen staff to be appropriately trained in allergens.

## Appendix 2 - Natasha's Law

From 1 October 2021 the requirements for prepacked for direct sale (PPDS) food labelling changed in Wales, England, and Northern Ireland. The new labelling helps protect customers by providing potentially life-saving allergen information on the packaging. Any business that produces PPDS food will be required to label it with the name of the food and a full ingredients list, with allergenic ingredients emphasised within the list.

### What is PPDS food

Prepacked for direct sale or PPDS is food which is packaged at the same place it is offered or sold to consumers and is in this packaging before it is ordered or selected.

It can include food that consumers select themselves (e.g. from a display unit), as well as products kept behind a counter and some food sold at mobile or temporary outlets.

Prepacked for direct sale (PPDS) food can include the following:

- Sandwiches and bakery products which are packed on site before a consumer selects or orders them.
- Fast food packed before it is ordered, such as a burger under a hot lamp where the food cannot be altered without opening the packaging.
- Products which are pre-packaged on site ready for sale, such as pizzas, rotisserie chicken, salads and pasta pots.
- Burgers and sausages pre-packaged by a butcher on the premises ready for sale to consumers.

### Food that is not PPDS

Any food that is not in packaging or is packaged after being ordered by the consumer.

These are types of non-prepacked food and do not require a label with name, ingredients and allergens emphasized.

Allergen information must still be provided but this can be done through other means, including orally (we have posters that should be on display to signpost customers to speak to our Catering team – detailed allergen information is uploaded to Cypad to support this).

Food packed by one business and supplied to another business. This is prepacked food and must already have full labelling, including the name of the food and a full ingredients list, with allergenic ingredients emphasized within it.

### How this affects Edsential?

As this law affects all parts of our business in some way. Below details what we need to do to ensure we meet the legal requirements.

#### Packed Lunches provided by Edsential

We no longer provide packed lunches that are made in anticipation of an event, such as a school trip/site activity.

If packed lunches are made and packed to order, these are not classed as pre-packed and are therefore not PPDS and do not need labelling.

We have a pre order form for schools/sites to pre order at least a week prior to a school trip, thus negating the need for individual labelling.

This will also allow time to order the correct products to ensure all allergen pupils /customers' requirements are met e.g. vegan cheese, gluten free bread etc...

As per our **Medical Diet Procedure**, if we are providing a packed lunch to pupils/customers with allergies and intolerances we should already hold their information at HQ/Residential Centre's, thus allowing us to support by providing them with a safe meal.

### Appendix 3 - Packed Lunch Pre-Ordering Form

A minimum of 1 weeks' notice to provide the packed lunch is required. Please complete below the pupil's name, sandwich choice and any pre confirmed allergies checking that Edsential have been notified previously. The Catering Supervisor will indicate the sandwich filling options and dessert available.

Please pass this information to your Catering Supervisor.

Date of trip..... Time required..... Class.....

| Pupil's/School Staff Members Name | Sandwich Choice | Allergy/Intolerance |
|-----------------------------------|-----------------|---------------------|
| 1.                                |                 |                     |
| 2.                                |                 |                     |
| 3.                                |                 |                     |
| 4.                                |                 |                     |
| 5.                                |                 |                     |
| 6.                                |                 |                     |
| 7.                                |                 |                     |
| 8.                                |                 |                     |
| 9.                                |                 |                     |
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| 14.                               |                 |                     |
| 15.                               |                 |                     |