

Allergen Policy

The Company firmly believes in providing high quality food to our customers and clients that is safe to eat.

We are therefore committed to reducing the risk to our customers with regards to the provision of food and the consumption of allergens which could lead to an allergic reaction.

The Company accept its duty to comply with all relevant Food Regulations, which states that allergen information must be provided on all food sold.

The Company acknowledges that the successful implementation of this policy and management of allergens requires the commitment and support from all employees. To achieve this The Company will:

- Work closely with our supply chain to ensure accurate information on all products that may contain allergens.
- Maintain a database of all our recipes, clearly listing ingredients and highlighting those containing allergens.
- Work closely with our clients in assisting in the support of customers with known allergies, including meeting with parents, if requested, to discuss any special requirements.
- Display signs that encourage our customers to ask about allergens in the foods being served.
- Ensure that our staff have the necessary training and information to provide our customers with accurate guidance on allergens.
- Through good hygiene practices and adhering to Hazard Analysis and Critical Control Points (HACCP), reduce the risk of cross contamination in our kitchens.
- Audit our operations to ensure the above policy and practices are working effectively and review the policy, as necessary.
- Operate as far as is practical a nut free environment within our primary and secondary school kitchens.

Responsibilities

The Directors of the Company will:

- Ensure the development and review the Company Allergen Policy.
- Ensure that the necessary resources are available for implementing the Allergen Policy and detailed arrangements, as well as the subsequent monitoring of performance.
- Ensure that the appropriate information, training and supervision is provided to all employees and apprentices.

The QHSE Department will:

- Develop the Company Allergen Policy and Procedures to ensure that it is legal and moral obligations are met.
- Work with the Primary Authority Agreement to ensure the policy and procedures are assured advice.
- Ensure that the policy and procedures are communicated to all stakeholders to ensure its effective implementation.
- Work with the Learning & Development Department provide relevant training material to ensure the effective implementation of the policy.
- Work with the Food Department to review and update policy and procedures when necessary.

The Procurement Department & Food Department will:

- Effectively communicate the Allergen Policy and procedures to all stakeholders.
- Ensure that all menu cycles are supported with accurate recipes and allergen information.
- Ensure that all recipes have the relevant allergen information.
- Ensure that suppliers provide accurate allergen information for products on the Company Approved Product List (APL).
- Ensure that any changes to products and recipes are communicated to all relevant Managers.
- Manage the labelling systems to ensure compliance with Natasha's Law
- Provide five core allergy free menus. Non Gluten Containing Ingredients/NGCI & Milk free/Milk Free/Egg free/Allergen Free
- Support with the completion of menus for students with more complex dietary requirements
- Provide additional support at Unit level where necessary with regards to menus

The Operations Team (Regional Operations Managers/Operations Manager/Area Manager/Area Support Managers) will:

- Ensure that all units have implemented the Company Allergen Policy and Procedures.
- Where necessary, with the Unit Manager, meet with Parents of **RED** category students to discuss and agree requirements where appropriate.
- Ensure a copy of this policy is shared and explained with the client.
- Discuss with the Client any issues concerning the means in which information regarding students with allergens is communicated to the Unit Manager, the identification of them, and agreeing a solution to ensure that the allergen procedures can be fully

implemented. Agreed actions will be recorded in writing, using the Alternative Menu Form where applicable.

- Ensure that the client is kept informed of the outcome of any meetings with parents concerning special diets.
- Ensure that the Termly Unit Allergen Checklist is completed by the Unit Manager and is reviewed upon the first visit of the term by a member of the Operations team.

The Unit Manager will:

- Ensure that the Company Allergen Policy and procedures are followed at Unit level.
- Liaise with the school to identify the students have special dietary needs & use the school's procedures to identify them (through wristbands, lanyards)
- Where necessary, with the Operations Manager, meet with any parents to discuss any individual student requirements. Agreed outcome from meetings to be recorded on the Alternative Menu Form.
- Ensure that the client is kept informed of the outcome of any meetings with parents concerning special diets.
- Ensure that where there are any **RED** category students the correct procedures are followed at all times.
- Enter student information onto the Unit cashless system, where relevant.(secondary schools)
- Ensure that all staff are aware of all information relating to students and their allergies.
- Purchase correct products as per the company recipes and company APL.
- Follow all recipes to ensure that allergen information is correct and up to date.
- Complete the allergen matrix when producing dishes, using information from recipes and ingredient packaging.
- Ensure that allergen matrices are reviewed and kept up to date to reflect any changes to recipes.
- To ensure that all allergen matrices are signed and dated when completed and/or reviewed.
- Ensure that any pre-packaged direct sale foods are correctly labelled to comply with Natasha's Law.
- Check product packaging before use/consumption packing will carry the manufacturer/suppliers up to date information. Update allergen information, as necessary.
- Complete the Company allergen training and ensure all Unit staff are trained.
- Support the School/Academy in the implementation of their own Allergy Procedures.
- Sign the Unit Manager's Declaration of Commitment to Allergen Safety.
- Complete the Unit Allergen Checklist at the beginning of each term and follow up on any actions.
- Immediately report any concerns or issues to their Operations Manager

All Company Employees will:

- Ensure that they follow the correct procedures detailed in the Allergen Policy to ensure the safety of students.
- Cooperate with the company on matters of allergen management and control, including completing any training. Reporting any concerns to their manager.

The School/Academy will:

- As data controllers, collect information of students with food allergies and intolerances, ensuring this information is kept up to date.
- Provide the Catering Manager/Supervisor with an up-to-date list of students with any food allergies, intolerances or dietary requirements.
- Ensure that any communication between parents and the caterer goes through the School/Academy and be involved at each stage.
- For primary/infant schools, ensure that the School/Academy has a formal process of identifying students with special dietary requirements, such as lanyards or wrist bands. This process should not be based solely on photographs or teachers identifying the pupil.
- Ensure that all staff and lunchtime assistants are adequately trained on allergens and school procedures.
- Educate pupils about allergies and to support peers with special diets.
- Provide the Catering Manager/Supervisor with information relating to the school Allergy Procedures/Policy.

The Parent/Guardian/Carer will need to:

- Inform the School/Academy of their child's allergy as soon as possible.
- Complete the Alternative Menu Form and return to the school, providing a medical support for food allergies.
- Where necessary meet with the Operations Manager/ Unit Manager to discuss any specific requirements relating to their child's allergy. Information from these meetings to be recorded on the Alternative Menu Form by the Operations Manager/Unit Manager.
- Inform the School/Academy of any changes.

The Student will:

- Work with the catering team to follow agreed procedures relating to foods.
- Take care to *knowingly* avoid any foods which may cause an allergic reaction.

Arrangements for Schools/Academies & Colleges

As the majority of the company's business is in the education section the following arrangements apply:

It is important for the safety of our customers that a Unit has accurate and relevant allergen information on the foods that it produces and services. The information on the 14 allergens will be recorded on Company recipes and Unit Allergen Matrices

Working with suppliers, allergen information is uploaded onto the recipe database. All company recipes are kept on this database where each ingredient is clearly listed.

Due to the possible severity of nut and peanut allergies, as a company we will not knowingly serve foods containing nuts or peanuts, such as peanut butter, Nutella, nut oils and foods containing nuts within our primary and secondary schools. Only with the signed agreement of our client will we serve products that contain nuts.

It is our legal obligation to provide accurate allergen information about the foods that we produce and service. However, in order to meet this obligation, we need schools to provide us with up to date and accurate information of students that have allergies or intolerances.

Where we have been informed of a student with severe allergies or who has suffered from anaphylactic symptoms they will be categorised as **RED** and will be treated in line with the procedures set out.

Other students with an intolerance will be categorised as **AMBER**.

Some families and students may have a dietary preference based on lifestyle choosing to exclude or include certain foods. These students will be categorised as **BLUE**.

Working with the school/academy we will seek to make the relevant information available to parents/carers of students who have food allergies.

Photos, where possible, and allergy requirements of students should be supplied by the school/academy to the catering team in hard copies which are visible within our kitchens. Where systems allow, this information will also be entered on to the Unit cashless systems. Catering teams are briefed on requirements and made aware of allergies and special dietary requirements.

Clear signage is displayed, specifically directing any customers with allergy concerns to a member of our catering teams. Our teams have access to information from the recipe database. Further escalation of this process can be taken directly to the catering manager on site and subsequently to our team of Operations Managers and Head of Food

The successful implementation of the Allergen policy requires the support and cooperation of the Procurement Department, Food Team, Unit Manager/Supervisor, all employees, The School/Academy, The Parent/Guardian/Carer and the Students.

Failure to follow the allergen procedures will be deemed as a breach of Company policy and result in disciplinary action which could result in dismissal as gross misconduct.

Special Diets

In order to ensure *that* the safety of students, particularly at primary school, the following procedures categorises the student depending upon their needs:

- **RED** severe reaction/anaphylactic symptoms disclosed.
 - **AMBER** food/allergen intolerance
 - **BLUE** excludes foods due to lifestyle preference.
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- **RED** **may** have an agreed plated meal prepared & served if requested.
 - **AMBER** will be a suitable meal served from the counter.
 - **BLUE** will be a suitable meal served from the counter.

Prior to the beginning of each term the school must provide the Unit Manager with written confirmation of the allergen and special diet requirements for the students that have allergies or dietary requirements. In addition, the school must provide this information for new students or any changes throughout the year.

Ideally this information should be provided using the Company's Special Diets Form and signed by the student's Parent/Guardian/Carer and supported by medical evidence where appropriate. In line with company's GDPR policy, any medical evidence supplied and shared will be returned to school and not held on file; any electronic copies will be deleted. The information on this form will be used to categorise the student's dietary needs. A photo of the student should be supplied as well.

If a student is categorised as **RED**, depending on the allergy, then the Operations Manager/Unit Manager may need to meet the parents/guardian/carers to discuss the students' needs and agreed actions in order to minimise any risk: this may result in an individual allergen free menu being agreed for the child. All information to be documented on the Alternative Menu Form and include permission to share any information with the catering team. As each stage is completed the Special Diets Procedure Tracker is signed off. Until this process has been completed the student may only be offered meals from the Allergen Free Menu or are to supply their own packed lunch.

It is best practice, in order to ensure that this information is clearly communicated to all of the Catering Team, is to transfer the student's photo and details of the foods that **MUST NOT** be served onto the relevant Allergen Sheets – **RED**, **AMBER** or **BLUE**

Ideally these sheets should be displayed in a prominent area of the catering department, near to the service point, where staff can easily refer to them at service. However, they should not be in view of others, such as teachers, visitors and students. Where this is not possible then a file containing this information, in the same format, must be available. Whatever method is used all staff must be trained and made fully aware.

Category Controls for **RED** students with individually agreed menus

Once the procedures above have been followed and an individual menu agreed for the student the following controls must be in place at all times

The Manager/Chef must communicate to the kitchen when food for **RED** category students is being prepared. Where possible this should be in a separate area, if this is not possible then

separated by time from other foods containing allergens. Prior to preparation the area and all equipment must be thoroughly cleaned using the 2-stage cleaning method and/or dishwasher to prevent cross contamination.

When preparing the meals, the Manager/Chef must thoroughly wash their hands and wear a disposable plastic apron over their uniform to prevent cross contamination. (The same control used when handling raw meat should apply). Care must be taken at all stages to prevent any allergen cross contamination including storage of ingredients, preparation, cooking and service.

Once completed the meal (main course and dessert) must be plated and double wrapped in cling film, clearly labelled with the student's name, date and dish description. If the cling film at any time is torn, removed or damaged the meal **MUST NOT** be served and immediately disposed of. It is the Manager/Chef's responsibility to check the dish before service to ensure that it is correctly covered and labelled.

The meal must be clearly identified to the members of staff responsible for serving the student, this information must be communicated directly to the staff by the Manager/Chef during the pre-service briefing.

The meal must be served directly to the student by the nominated member of staff responsible for serving the student.

The Allergen Free Meals Sheet must be signed by the person who has prepared the meal and the person who has served the meal. A master copy of this can be found in the Unit Allergen Folder. These must be retained for 6 weeks.

It is for the student's safety that the above procedures are followed at all times, if at any time this cannot be followed then the Unit Manager must agree an action with the school.

At no time should a **RED** student, **with an agreed menu**, be served food from the counter due to the risk of cross contamination, unless agreed by the parent and documented on the Special Diets Form.

AMBER & BLUE Controls

Students that are in the **AMBER** or **BLUE** category can be served from the counter ensuring that they are served the correct meal, as ordered by parent/guardian. Staff must be briefed before service by the Unit Manager/Chef using the Pre-Service Briefing Sheet.

For delivered Services the above procedures must be followed for **RED**, **AMBER** & **BLUE** students. Any **RED** meal need to be double wrapped in cling film and transported to avoid cross contamination, ideally in a separate container. If this is not possible the parents of **RED** student must be made aware of transport arrangements and agree that they are sufficient. In addition, a completed accurate Allergen Matrix for all dishes must accompany the food being delivered for service. The matrix must be completed and signed by the production kitchen and handed to the service employees, who must sign upon receipt. This matrix must be kept for a period of 6 weeks.

This **part of the** policy must be read in conjunction with The Guide to Allergen, Lifestyle & Medical Diet Provision in Schools, produced by the Food Department.

In secondary schools student information can be entered on the till system allowing student dietary requirement to automatically be identified at point of sale. If an individual menu is agreed then the above procedure needs to be followed.

General Food Production and Service

It is important to reduce the risk of allergen cross contamination with allergens in the general production and service of foods within the business. The following procedures are in place to reduce the risk:

- Cleaning work areas down, using 2 stage cleaning, in between preparing different foods.
- Ensuring all equipment and utensils are cleaned in-between usage.
- Storing ingredients and foods in closed and labelled containers, this includes the Dry Stores, fridges and freezers.
- Store ingredients containing allergens separate from others.
- Washing hands thoroughly between preparing different foods.

Cooking can also result in cross contamination – such as chips cooked in the same oil as fish cannot be considered gluten or fish free.

When cooking allergen free foods, the use of separate clean oven cloths maybe needed to prevent cross contamination where relevant.

Due to nature of the business, it is not possible to completely eliminate the risk of cross contamination, unless a meal is produced for an individual in line with procedures for a **RED** category student.

At no time will the company make a free-from claim.

Allergen Matrices and Labelling

Any allergens contained within the food produced on site must be clearly communicated to any customer upon request. This information is produced in the form of an Allergen matrix and must be available for all foods in all service areas.

An accurate Allergen Matrix must be available for all foods served in the Unit to ensure that verbal information is accurate and can be cross referenced. The relevant/daily allergen matrix must be displayed on the orange clipboard in each service outlet.

Allergen Matrices for lunchtime service must be reviewed/updated each time the dishes are prepared within the menu cycle, the matrix must signed and dated at each review.

Allergen matrices for services such as cold deli, hot deli, cakes must be reviewed as required to ensure that they are accurate at all times. The matrix must be signed and dated at each review.

Staff should also be aware and vigilant of cross contamination during service, such as salad bars, unwrapped cakes sharing a display unit, serving utensils & spillages.

Natasha's Law requires that any pre-packaged direct sale foods(PPDS) are clearly labelled with the following:

- The food name
- Full list of ingredients with the allergens emphasised

Within the business this will include foods such as sandwiches, baguettes, salad boxes, dessert pots, burgers and wraps, that have not been pre-ordered. Natasha's Law will mainly apply to the secondary school sector of the business as the majority of primary school pre order meals.

The company have an approved range of foods, that are defined as PPDS. These foods are supported by standard recipes and ingredients which will allow an online labelling system to produce ingredients labels that comply with the requirements of the law.

It is important that all foods be labelled to identify if they contain any of the key allergens, therefore all in house produced will be labelled with the appropriate allergen label when stored in the fridge, freezer or dry stores. In addition, any foods that have been decanted from the original packaging will need to be labelled with the appropriate allergen label. Foods still in the original packaging do not need an allergen label as the manufacturer's information is available, even if opened, however they still need to be date labelled.

The Allergen Notice must be clearly displayed in a prominent position in all service areas instructing customers to ask a member of the Catering staff about allergens in the food produced on site.

Hospitality Catering

Where possible it should be established at the time of booking if any persons attending have any allergies or special dietary requirements.

If YES separate foods must be prepared and labelled - following the procedures list in the **RED** category controls section.

An Allergen Matrix to be completed for each booking ensuring that any allergen information can be accurately communicated upon request. This must detail each item being served.

If the hospitality is taking place during normal service times, then an A5 sign needs to be displayed.

Hospitality bookings outside of normal service times or in remote locations then completed, accurate Allergen Matrix must be sent.

Checks and Audit.

To ensure that all allergen procedures are being followed at all times the Unit Manager will complete the Termly Unit Allergen Checklist at the beginning of each term on the mpro5 system. Operations Managers will be able to monitor and review the Termly Allergen Checklist via the mpro5 dashboard. Any issue identified must be addressed immediately with retraining taking place where necessary. Depending on issues identified an allergen investigation may be necessary which may lead to disciplinary action being taken.

Members of the Operation Team will make spot checks on regularly visits any issues must be recorded in the Logbook (in the comments section) and addressed immediately.

Allergen Investigation

Any Allergen incident or near miss must be report by the Unit Manager to their Operations Manager immediately. The QHSE Department and Head of Food must all be informed the same day.

All incidents must be investigated by a member of the Operations Team within 24 hours of the incident occurring in order to establish the root cause of the incident. This includes a review of procedures, employee knowledge and compliance with procedures. Once completed the findings will be communicated to all relevant parties and any required action taken.

Any allergen incident resulting in hospital treatment will be reported to Worcestershire Regulatory Services under the Primary Authority Agreement by the QHSE Department.

Training

All employees must complete the relevant training necessary in order to keep our customers safe and support the effective implementation of the Allergen Policy. This includes:

- Allergen Induction Training
- Allergen Safety Training (e-learning)
- Allergen Policy & Procedures for managers & operations
- Unit Allergen Procedures
- Take10 Refresher Training

All training is recorded on an employee's Training Record Card (paper or digital)

Documentation

Copies of all documentation can be found in the Unit Allergen Folder or as electronic versions in the Document Library via the Internet

Dealing with Severe Allergic Reaction

When someone has an allergic reaction to a food it is important that all staff should know what to do.

Important - Warning signs

It is not always clear if someone is having an allergic reaction because other serious conditions can have similar symptoms.

However, warning signs to look out for are:

- if they are finding it hard to breathe,
- if their lips or mouth are swollen,
- itching around the mouth
- wheezing
- rashes
- vomiting
- diarrhoea
- may collapse.

If the above happens, this is what you should do:

- Do not move the customer. This could make them worse.
- Call 999 immediately and describe what is happening; explain that you think the customer may be having a serious allergic reaction or anaphylaxis (pronounced anna-fill-axis). It is important to mention the word anaphylaxis to ensure that the urgency of the situation is communicated, and that appropriate medication will be available.
- Ask the customer if they carry an epi pen and, if necessary, help them retrieve it.
- If a staff member or first aider is trained in administering adrenaline, and the customer is struggling to self-administer, then offer to assist them.
- Send someone outside to wait for the ambulance while you stay with your customer until help arrives.

We operate a Primary Authority Agreement with Worcestershire Regulatory Services who have approved our policies and procedures.