

INDEPENDENTCATERING

Allergy and Food Intolerance Procedure

Introduction

This procedure covers allergies and food intolerances. Our Hazard Analysis Critical Control Point Plan (HACCP) includes allergens as a food hazard. Adequate allergen training must be given to staff in line with their responsibilities. Every member of staff must sign to state that they have read, understood and will abide by this procedure. This procedure links to our Food Hygiene Policy. Further key information is provided in the Unit's Managing Allergy file, instructions and our training. Key definitions are provided within our Allergy training.

Legislation

The Food Information Regulations 2014 state that all customers must receive sufficient information to make informed and safe decisions when ordering or purchasing food. It places a legal duty on food businesses to provide accurate allergen information. There are major 14 allergens that need to be declared. This information applies to both prepacked and non-prepacked food. There are specific rules for prepacked food for direct sale (PPDS) items requiring the full ingredients lists with highlighted allergens from October 2021 known as 'Nastashas Law'. Information on labels must be emphasized in a specific type such as bold. **Benedict's Law comes into effect from September 2026, where schools must adhere to mandatory statutory guidance including appointing an allergy lead, staff training, maintaining allergy action plans and holding emergency auto-injectors (AAIs). Independent Catering will work with the school to lower allergen risks.**

Allergens

The legislation includes providing information on the following 14 allergens



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If a customer has an allergy it will involve the immune system, so our controls are essential. Allergic reactions can make people very ill and can sometimes lead to death. We have a legal responsibility to provide the correct allergen information about the ingredients that are in the food we make and serve to our customers.

Food Intolerances

This is when the digestive system struggles to break down certain foods causing illness. Common foods include lactose (dairy), gluten (wheat, barley and rye) and histamine (aged cheese).

Coeliac disease is a condition where the immune system attacks a person's immune system when they eat gluten. It is therefore important to inform our customers of any ingredients that may affect them when they let us know that they have an intolerance.

Responsibilities

The following responsibilities must be adhered to as follows:

All Staff

- Follow this Procedure, our HACCP, Allergy instructions, menus and notices displayed in the kitchen.
- Ensure you know where the Allergy File is located and use it as directed by your Manager to check information given to customers.
- If you cannot verify the allergen status of an ingredient or dish, do not serve it.
- It is not acceptable to say that you don't know what allergens are in the food you serve. You are also not allowed to say that all the foods you serve could contain an allergen.
- All staff must accurately communicate to customers which dishes contain any of the 14 major allergens. This applies whether food is ordered at a counter, selected from a display or purchased pre-packaged. If you are unsure or do not know the allergens, check with your manager.
- Check manufacturers' labels for any changes to ensure they correspond accurately with the menu. Manufacturers can reformulate products at any time, so regular verification is essential.
- Cross-reference the allergen key displayed with your current allergen matrix. If you notice any discrepancies, report them to your Manager immediately—do not wait until the end of service.
- Check pupils for lanyards and ensure that if they have an allergy and are asking for a food that could make them ill, that they are offered a safer alternative. Inform your manager.
- Monitor controls in the Allergy File and Due Diligence book.
- Not to cross contaminate (cross contact) allergens. Clear up spillages immediately to prevent cross-contamination.
- Report any unauthorised allergens or any food items to your person in charge of the catering unit.
- Attend any allergy training given and ask questions if any areas need to be explained. Report to your manager if you have not received the training.

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- Not to bring any food into the unit, unless authorised in writing by a Director
- Follow the Unit Allergy Instructions

Unit Managers (this includes Chefs/Person in Charge of Catering Unit)

- Purchase ingredients and products from authorised suppliers who can provide accurate allergen information and maintain proper documentation.
- Ensure a Special Diets Referral Form is correctly filled in and if a serious allergy and/or food intolerance is identified an individual Allergy and Food Intolerance Risk Assessment is to be completed and staff trained on the contents.
- Any actions identified from the risk assessment must be implemented.
- Check the ingredients list and ask the supplier at the point of order if you are unsure about any allergen information.
- Ensure that when a cash purchase or alternative product is used, the allergens are thoroughly checked before the product enters your kitchen.
- Do not buy from non-approved suppliers without prior approval from your area manager.
- Maintain the Allergy File where an allergy matrix with ingredient information is collated. This is your main reference document for all allergen queries.
- Check the packaging of all deliveries and record any allergens highlighted on the manufacturer's label, including crucial 'may contain' warnings. Verify that documentation matches the products received.
- Once opened, store food containing allergens in sealed containers separately from other food.
- Check that all decanted food is labelled correctly, clearly stating allergens on the label to prevent confusion.
- Conduct an allergy briefing before each service to clarify all allergens on the matrix and ensure information is available in all correct locations.
- Liaise with relevant school personnel if more information is required regarding a pupil's allergy.
- Induct and ensure that staff are adequately trained to undertake their activities to keep our customers safe.
- Check that all staff are compliant. If any staff fail with any of their responsibilities, an investigation could be required and then retraining must be undertaken. Depending on the severity of the failure disciplinary action may be required.
- Report any food safety allergy and food intolerance incidents including near misses to your line manager.
- Work with the school on food safety matters such as pupils with allergies and special diets to ensure that their health is not affected by the food being served and eaten.
- Cooperate with the school on any training that their staff have undertaken and their responsibilities regarding any actions that they are required to do.

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Operational Area Managers and Area Operational Support Team

- Oversees the Person/s in charge of the Catering Units to ensure that allergens and food intolerances are managed correctly.
- Inform your line manager of any significant risks relating to allergens and food intolerances and necessary controls to minimise the risks.
- Liaise with the schools on pupils with severe allergies.
- Ensure that the Special Diets Referral Form is correctly filled in and if a serious allergy is identified check that the individual Allergy Risk Assessment is completed correctly and staff trained on the contents.
- Audit actions identified from the risk assessment.
- Spot check areas within the kitchen including fridges and freezers and the due diligence book.
- Ensure managing allergen audits of catering units and suppliers are undertaken and any areas of non-compliance addressed.

Managing Director and Directors

- Director's to report any significant allergens and food intolerances risks to the Managing Director.
- Liaise with the School's Allergy Lead on their policy and related documents and cooperate to reduce allergy risks.
- Oversees the Area Manager responsibilities.
- Ensure that adequate resources are available to effectively manage allergens and food intolerances.

Food Storage

Daily checks must be carried out on all storage to identify any suspect items that contain any nuts that may have been accepted in error. These items must be removed and reported as a near miss. All ingredients must be stored in sealed and labelled containers.

Ensure that when open packages are transferred into another container the labelling for that product is included.

Preparation

When preparing food, ensure that all of the ingredients used have clear labels with the allergens in **bold**. List those ingredients and write the allergens onto the allergy matrix. It is important to document any 'may contain' warnings on ingredient labels for customers with severe allergies, as even trace amounts can be dangerous.

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If the recipe changes do not use any old matrixes but ensure that the matrix is the same as the ingredients used on that day. Personal hygiene as stated in the Food Safety Policy is essential when preparing allergen free meals.

When preparing food for a customer with an allergy, ensure that the environment, equipment and ingredients are without that allergen/s.

Preventing Cross Contamination

It is vital that all staff avoid allergen cross contamination (cross-contact). Follow good hygiene practices as stated in our Food Hygiene Policy, HACCP, unit instructions and the due diligence book. Keep lids on containers at all times to prevent airborne contamination and accidental contact. Separate utensils are required for serving including buffets. Prepare and store allergen-containing products separately from non-allergen products, e.g. using separate equipment, such as colour-coded boards.

If cooking in oil, staff must identify what was previously cooked in the same oil (for instance, battered fish, scampi, breaded items). Oil retains allergen residues that can contaminate subsequent foods. So therefore oil could be a source of cross contamination and so the oil may need to be changed or food items cooked separately. When filling in the food allergen matrix, managers must include dressings, toppings, sauces, and garnishes. These can contain multiple allergens and are frequently overlooked.

When transporting food keep specific allergen free food, required for a specific customer separate from other foods and label. Storage boxes must be cleaned and disinfected prior to use.

Cleaning and Spillages

Kitchen and serving areas operate a clean as you go policy. Crumbs and food debris indicate a potential to cross contaminate allergens, so must be removed by cleaning and disinfecting. The cleaning schedule must be adhered to. All work equipment must be thoroughly cleaned and disinfected. Extra vigilance is required when cleaning areas for any customers with specific food requirements with a known allergen.

If any ingredient spills accidentally onto another ingredient and it is unknown if there could be a potential for allergens, then the products must be disposed of and recorded. Clean up all spillages immediately and sanitise all areas thoroughly.

Pre-packed Foods

These are foods that are already in packaging before being sold. They are in packaging that has to be opened, to be altered and are ready for sale and include bottled and canned drinks, biscuits, chocolate and other snacks. There has to be an ingredient list, with all of the allergens emphasised, on the packaging. We must check the labels to ensure the allergens are clear stated before serving pre-packed foods to customers.

Pre-packed For Direct Sale (PPDS)

PPDS foods are prepared and packed on the same premises where sold and before they are ordered or selected by customers. For example, if we make salads, sandwiches or other foods on-site and put them in

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packaging ready for sale, this will apply. PPDS foods must have a full ingredients list, with all of the allergens emphasised, on the packaging.

Non-pre-Packed Foods

This will include meals prepared, cooked/ready-to-eat and served to customers and any loose foods selected from displays, e.g. buffets. We must provide allergen information for all loose foods containing any of the 14 allergens, recorded on our allergen matrix.

Allergen Matrix

The Allergen Matrix is your most important tool for communicating allergen information. Every single dish or food item not sold in its original manufacturer's packaging must have an allergen breakdown created on this matrix. The matrix must accurately highlight which of the main 14 allergens are present in each dish. Always double-check the information on the matrix. Ensure all matrixes are kept once completed. These records provide evidence of due diligence and may be required for investigation.

The Allergen Matrix must be signed and dated clearly, so the signature can be read. This is important so that staff members know which is the current matrix to use. An unsigned or undated matrix is not to be used. Identify the area for the matrix, whether that be for the Main Restaurant Till Points, Pod, or Van.

Each service area must have its own specific matrix reflecting what is served there. Record the name of each dish and highlight which of the 14 main allergens are present. Include all garnishes, sauces, and accompaniments. Ensure that no other food types are added once the matrix has been completed. Look for hidden allergenic ingredients, e.g. Worcestershire sauce contains anchovies (fish) and ensure that this included in the matrix.

Ensure that even items that are allergen-free are recorded on the matrix. This provides a complete overview and avoids confusion, clearly indicating what is safe for customers with allergies. It is important to document any 'may contain' warnings on ingredient labels for customers with severe allergies, as even trace amounts can be dangerous. The completed and briefed matrix must be printed and placed at every till point where food is sold. It shall be readily available for both staff and customers to consult. Examples of filled in allergen matrixes are included in the mandatory training provided.

Labelling

Our standardised single labelling system is to be used. Any decanted ingredient must have an allergen label with all allergens clearly identified. Labels must be legible and positioned where they can be easily read. Failure to label properly is a breach of food safety law and puts vulnerable customers at serious risk. All units must use the label shown below.

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ALLERGEN
Product:
Produced/Frozen/
Defrosted/Opened On:
Use By Date:
Prep By Date:

Contains the following Allergens:

☐ Gluten
☐ Nuts
☐ Mustard

☐ Crustaceans
☐ Eggs
☐ Lupin

☐ Molluscs
☐ Soy
☐ Sesame

☐ Fish
☐ Milk
☐ Sulphur Dioxide

☐ Peanuts
☐ Celery
☐ Other

May contain the following Allergens:

☐ Gluten
☐ Nuts
☐ Mustard

☐ Crustaceans
☐ Eggs
☐ Lupin

☐ Molluscs
☐ Soy
☐ Sesame

☐ Fish
☐ Milk
☐ Sulphur Dioxide

☐ Peanuts
☐ Celery
☐ Other

Information on our Menus

An allergen key system is used. The allergen numbers are stated on our school menus as shown below:

Pork Sausage in a Roll (1, 14)	Spaghetti Bolognese (1)	Roast Turkey	Minced Beef & Mushroom Ragout with Rice (1, 11)	Breaded Fish (1, 4)
eggie Sausage in a Roll (1, 8) VEGAN	Roasted Vegetable Wrap (1) VEGAN	Leek and Potato Pie with a Shortcrust Topping (1, 9)	Vegetable Cottage Pie VEGAN	Homemade Spring Roll (1, 8) VEGAN
Tomato Pasta (1) VEGAN		Roasted Vegetable Pasta (1) VEGAN		Chunky Tomato Pasta (1) VEGAN

1 CEREALS CONTAINING GLUTEN	3 MOLLUSCS	5 PEANUTS	7 EGGS	9 MILK	11 MUSTARD	13 SESAME
2 CRUSTACEANS	4 FISH	6 NUTS	8 SOYBEANS	10 CELERY	12 LUPIN	14 SULPHUR DIOXIDE

Our menus contain the following statement:

‘Ingredients containing gluten indicated by number 1 will contain WHEAT, OATS, BARLEY, SPELT, RYE OR KAMUT OR A COMBINATION.’

‘IF YOU HAVE ANY ALLERGEN CONCERNS PLEASE SPEAK TO THE CATERING MANAGER. WHILST WE DO NOT BRING WHOLE NUTS OR INGREDIENTS WITH NUTS INTO OUR KITCHENS, SOME PRODUCTS ARE SUBJECT TO ‘MAY CONTAIN’ STATUS IN MANUFACTURING’

Displaying Allergen Information

Clear, accessible allergen information allows customers to make safe choices. Every unit must use multiple display methods to ensure this vital information reaches everyone who needs it. The allergen matrix is to be at each service point, so easily accessible to staff serving customers. This ensures accurate information can be provided immediately when customers ask questions.

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On our salad bar, the allergens are highlighted directly on the salad cards positioned at each item. This allows customers to quickly identify which salads are safe for them whilst selecting their meal. At self-service areas, an allergen notice must state that there is a risk of cross-contamination and this shall be clearly visible to customers. This warning is legally required and protects vulnerable customers as shown below:



Incidents and Training

Induction training must be given to all new staff during their first week of employment, by the Unit/Group Manager and must include allergens using our specific allergen training package. An allergen briefing is to be carried out before service. Area Managers, Unit Managers and chefs must hold a Food Allergen Management for Caterers certificate. All training must be recorded on the staff's training record sheets.

If there is an incident relating to allergies or food intolerances, the details to follow are provided in the Food Hygiene Policy. Staff must be trained in what to do if a customer has an allergic reaction and know who the first aiders are on site.

Monitoring and Review

This procedure shall be reviewed annually or before if there are changes in legislation or if there has been a food safety allergy or food intolerance incident where new procedures are required. All documents relating to food hygiene and allergens must be kept for at least 3 years.

Related Documents

Food Hygiene Policy
Allergen Unit Instructions
Due Diligence Book
Allergen File
Allergen Matrix
Individual Allergy risk assessment
Allergen Training Presentation

Signed *Andrew Saunders*

Managing Director