

Title	Allergen Policy
Associated Policies	<ul style="list-style-type: none"> Health and Safety (TPO/HS/03)

REVIEWED: APRIL 2022

NEXT REVIEW: APRIL 2023

1. Policy Statement

- 1.1 Brooke Weston Trust firmly believes in providing high quality food to our staff and students 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.
- 1.2 Brooke Weston Trust accepts its duty to comply with all relevant Food Regulations, which states that allergen information must be provided on all food sold.
- 1.3 Brooke Weston Trust acknowledges that the successful implementation of this policy and management of allergens requires the commitment and support from all employees. To achieve this Brooke Weston Trust 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 schools in assisting in the support of staff and students 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.

2. Who is responsible for carrying out this policy?

- 2.1 **The Head of Catering will:**
 - Ensure the development, review and implementation of Brooke Weston Trust Allergen Policy to ensure that its legal and moral obligations are met.
 - 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.
 - Comply with the Food Standards Agency 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.
 - Ensure that all menu cycles are supported with accurate recipes and allergen information.

- Ensure that all recipes will have the relevant allergen information.
- Ensure that suppliers provide accurate allergen information on products on Brooke Weston Trust Approved Product List (APL).
- Ensure that any changes to products and recipes are communicated to all relevant catering leads.
- Provide additional support at Unit level where necessary.
- Where necessary, with the catering lead, 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 all the schools in the Trust.
- Discuss with the schools any issues concerning the means in which information concerning students with allergens is communicated to the catering lead, and the identification of them, and agree on a solution to ensure that the allergen procedures can be fully implemented. Any agreed actions will be recorded in writing, using the Special Diets Form (appendix 1) where applicable.
- Ensure that the schools are kept informed of the outcome of any meetings with parents concerning special diets.
- Ensure that all schools complete the Unit Allergen Self Audit at the beginning of each term.

2.2 The Catering Leads will:

- Ensure that Brooke Weston Trust's Allergen Policy and procedures are followed at school level.
- Liaise with the school to identify which students have special dietary needs and use the school's procedures to identify them (through wristbands, lanyards)
- Where necessary, with the Head of Catering, meet with any parents to discuss any individual student requirements. Agreed outcome from any meetings to be recorded on the Special Diet Form.
- Ensure that the schools are 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 school's cashless system, where relevant.
- Ensure that all staff are aware of all information relating to students and their allergies.
- Purchase correct products as per Brooke Weston Trust recipes and 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 the all 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.
- Check product packaging before use/consumption as the packing will carry the manufacturer/suppliers up to date information and update allergen information, as necessary.
- Complete Brooke Weston Trust's allergen training and ensure all kitchen staff have been trained.
- Complete the Kitchen Allergen Self Audit at the beginning for each term and follow up on any

actions.

- Immediately report any concerns or issues to the Head of Catering.

2.3 All Trust employees and apprentices will:

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

2.4 The school will:

- As data controllers, collect information of students with food allergies and intolerances, ensuring this information is kept up to date.
- Provide the Catering lead with an up-to-date list of students with any food allergies, intolerances or dietary requirements.
- Ensure that any communication between parents and the catering lead goes through the school and be involved at each stage.
- For primary schools, ensure that the school 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.
- For secondary schools, ensure that the school has a formal process of identifying students with special requirements. Ensuring the allergy information has been entered onto the cashless payment system, so that it will flag up when a student purchases their meal.
- Ensure that all staff and lunchtime assistants are adequately trained on allergens and the school's procedures.
- Educate pupils about allergies and to support peers with special diets. Set up information boards in each school and hold workshops with students to help understand the importance of allergies and special diets.
- Provide the Catering Manager/Supervisor with information relating to the school's Allergy Procedures/Policy.

2.5 The parent/carer will need to:

- Inform the school of their child's allergy as soon as the Home School Agreement has been completed. Tick box to confirm the Allergen form has been completed.
- Complete the Special Diets/Allergy Form and return to the school, providing a medical support for food allergies.
- Where necessary meet with the catering lead to discuss any specific requirements relating to their child's allergy. Information from these meetings to be recorded on the Special Diets Form by the catering lead.
- Inform the school of any changes.

2.6 The students 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.

3. Arrangements for Schools

3.1 As the majority of Brooke Weston Trust's business is in the education section the following arrangements apply:

- 3.2 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 Trust's recipes and Unit Allergen Matrices.
- 3.3 Working with suppliers, allergen information is uploaded onto the recipe database. All Trust recipes are kept on this database where each ingredient is clearly listed.
- 3.4 Due to the possible severity of nut and peanut allergies, as a Trust 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.
- 3.5 Whilst we are unable to completely eliminate the possibility that nut, or nut products may be present in ingredients supplied to us, we require our suppliers to make practicable efforts to ensure they comply with this. However, in schools and workplaces we do not avoid products containing nuts or peanuts.
- 3.6 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 parents to provide us with up to date and accurate information of students that have allergies or intolerances.
- 3.7 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**.
- 3.8 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**.
- 3.9 As a school we will seek to make the relevant information available to parents/carers of students who have food allergies.
- 3.10 Photos and allergy requirements of students should be supplied by the school to the catering team in hard copies. Under GDPR regulations these will be locked away when not in use. Where systems allow, this information will also be entered on to the Unit's cashless systems. Catering teams are briefed on requirements and made aware of allergies and special dietary requirements.
- 3.11 Clear signage is displayed, specifically directing any customers with allergy concerns to a member of our catering teams. Our teams have access to print outs from our recipe database. Further escalation of this process can be taken directly to the catering manager on site and subsequently to the Head of Catering.
- 3.12 The successful implementation of the Allergen policy requires the support and cooperation of the Central team, Catering Manager/Supervisor, all employees, the school, the parents/carers and the students.
- 3.13 Failure to follow the allergen procedures will be deemed as a breach of Trust policy and result in disciplinary action which could result in dismissal as gross misconduct.

4. Special Diets

- 4.1 In order to ensure 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.

 - **RED** will have an agreed plated meal prepared and served if requested.
 - **AMBER** will be a suitable meal served from the counter.
 - **BLUE** will be a suitable meal served from the counter.

- 4.2 Prior to the beginning of each term the school administrator or person in charge of collecting student data, must provide the catering lead 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.
- 4.3 Ideally this information should be provided using Brooke Weston Trust's Special Diets Form and signed by the student's parent/carer and supported by medical evidence where appropriate (see appendix 1). 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**, then the Business Manager/Operations Lead/Catering manager may need to meet the parents/guardian/carer to discuss the students' needs and agreed actions in order to minimise any risk. This will also include permission to share any information with the catering team. These must be documented on the Special Diets Form. As each stage is completed the Special Diets Procedure Tracker is signed off. Until this process has been completed the student will only be offered meals from the Allergen Free Menu or are to supply their own packed lunch.
- 4.4 Best practice, 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**.
- 4.5 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 to ensure that personal data is not disclosed. 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 of it.

5. **RED** Category Controls

- 5.1 Once the procedures above have been followed and a menu agreed for the student, the following controls must be in place at all times.
- 5.2 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 it should be 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.
- 5.3 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.
- 5.4 Once completed the meal (main course and dessert) must be plated and double wrapped in cling film, then 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.
- 5.5 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.
- 5.6 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.
- 5.7 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 catering lead must agree an action with the school.

- 5.8 At no time should a **RED** student 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.

6. **AMBER & BLUE Controls**

- 6.1 Students that are **AMBER** or **BLUE** can be served from the counter ensuring that they are served the correct meal. Staff must be briefed before service by the catering lead/Chef using the Pre-Service Briefing Sheet.
- 6.2 For delivered services the above procedures must be followed for **RED**, **AMBER** & **BLUE** students. Any **RED** meals need to be double wrapped in cling film and transported to avoid cross contamination, ideal in a separate container. If this is not possible the parents of **RED** student must be made aware of transport arrangements and clear 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.
- 6.3 This policy must be read in conjunction with the Guide to Provision of Special Diets in Schools, produced by the Food Department.

7. **General Food Production and Service**

- 7.1 It is important to reduce the risk of 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.
 - Keep ingredients containing allergens separate from others.
 - Washing hands thoroughly between preparing different foods.
- 7.2 Cooking can also result in cross contamination – such as chips cooked in the same oil as fish cannot be considered gluten or fish free.
- 7.3 When cooking allergen free foods, the use of separate clean oven cloths maybe needed to prevent cross contamination where relevant.
- 7.4 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.
- 7.5 At no time will Brooke Weston Trust make a free-from claim.
- 7.6 Any allergens contained within the foods 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.
- 7.7 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.
- 7.8 Allergen Matrices for lunchtime service must be reviewed/updated each time the dishes are prepared within the menu cycle, the matrix must be signed and dated.
- 7.9 Allergen matrices for services such as cold deli, hot deli, cakes must be reviewed at a minimum of once a term unless ingredients or product recipes have changed. The matrix must be signed and dated at each review.
- 7.10 Staff should also be aware and vigilant of cross contamination during service, such as salad bars,

unwrapped cakes sharing a display unit, serving utensils and spillages.

- 7.11** It is a legal requirement that any brought in pre-packed foods containing any of the key allergens must be clearly labelled to identify them. Some products may also contain the statement 'may contain' which highlights the possibility of cross contamination from the factory or production. These products will not be suitable for students with severe allergen risk due to the risk of cross contamination.
- 7.12** 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.
- 7.13** Foods such as in-house sandwiches & baguettes do not need labelling as the allergen information is available on the relevant allergen matrix, until the requirements of Natasha's Law are implemented. 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.

8. Hospitality Catering

- 8.1** Where possible it should be established at the time of booking if any persons attending have any allergies or special dietary requirements.
- 8.2** If YES separate foods must be prepared and labelled - following the procedures list in the **RED** category controls section.
- 8.3** An Allergen Matrix needs to be completed for each booking to ensure that any allergen information can be accurately communicated upon request. This needs to detail each item being served.
- 8.4** If the hospitality is taking place during normal service times, then an A5 sign needs to be displayed.
- 8.5** For hospitality booking outside of normal service times or in remote locations then completed, accurate Allergen Matrix must be sent.

9. Arrangements for all other businesses (workplace/general public)

- 9.1** Any allergens contained within the foods 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.
- 9.2** 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.
- 9.3** 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.
- 9.4** It is important to reduce the risk of cross contamination with allergens in the general production and service of foods with 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.
 - Keep ingredients containing allergens separate from others.
 - Washing hands thoroughly between preparing different foods.
- 9.5** Cooking can also result in cross contamination – such as chips cooked in the same oil as fish cannot be considered gluten or fish free.

- 9.6 When cooking allergen free foods, the use of separate clean oven cloths maybe needed to prevent cross contamination where relevant.
- 9.7 Due to nature of the business, it is not possible to completely eliminate the risk of cross contamination.
- 9.8 Brooke Weston Trust would follow the previous arrangements as stated above to provide 'Free From' where possible and would be clearly labelled.
- 9.9 It is a legal requirement that any brought in pre-packed foods containing any of the key allergen must be clearly labelled to identify them. Some products may also contain the statement 'may contain' which highlights the possibility of cross contamination from the factory or production. These products may not be suitable for customers with severe allergen risk due to the risk of cross contamination.
- 9.10 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.
- 9.11 Foods such as in-house sandwiches & baguettes do not need labelling as the allergen information is available on the relevant allergen matrix, until the requirements of Natasha's Law are implemented.
- 9.12 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.

10. Allergen Investigation

- 10.1 Any allergen incident or near miss must be report by the catering manager to their Business Manager immediately. The Head of Catering must all be informed the same day.
- 10.2 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.
- 10.3 Any allergen incident resulting in hospital treatment will be reported to North Northamptonshire Council for Corby and Kettering schools and Fenland Council for Wisbech schools.

11. Training

- 11.1 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

All employees complete this either pre-employment or on Day 1 of employment.

- Introductions to Allergens
- The importance of allergen management and controls
- How allergen information is provided within our business

Allergen Policy and Procedures

This training is completed by all employees involved in food production and service. The roles & responsibilities section will vary depending on who is being trained. This is completed during Week 1 where necessary.

- Company Allergen policy and Unit procedures, company recipes and allergen matrices.
- Roles and responsibilities in dealing with allergens,
- Red, Amber and Blue category students and relevant procedures

- Risk of cross contamination when storing preparing and serving foods and relevant controls.
- Supporting documentation

Online Allergen Training

All employees complete the online Allergen training within the first 3 weeks of employment. The training includes:

- The 14 food allergens
- Symptoms of an allergic reaction
- The law concerning allergens.
- How to help someone suffering from an allergic reaction

Allergen Management Level 3

A one-day course for key personnel within the business as required.

Refresher Training

As required, minimum once a year.

All training is recorded on an employee's Training Record Card.

12. Documentation

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

13. Dealing with Severe Allergic Reaction

13.1 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.

Document Control

Date of last review:	April 2022	Author:	Head of Catering
Date of next review:	April 2023	Version:	1
Approved by:	Strategic Delivery Group	Status:	Ratified

Summary of Changes

- Entirely new policy outlining approach to management of allergens within our schools.

Appendix 1: Special Diets/Allergy Form

Brooke Weston Trust is committed to providing meals for children with special diets for medical and cultural requirements.

It is essential that all parties concerned work together when providing a safe, special diet and that this is reviewed with every menu change. Therefore, please ensure this form is fully completed.

If the parents and Head teacher are happy, we will also display a 'Food Allergy Record Sheet' and a photo of the child on the kitchen wall near the server.

It is vital that all forms are accompanied with a referral letter or other information from a medical professional (GP/consultant/dietician). It is important the catering manager have met the student's parents/guardian and students requiring the special diet to ensure they give the right meal to the right child. This form should be handed into the school and discussed with them in the first instance.

Student Details					
School/Academy				Male	Female
Student's Name					
Student's Class					
Diet required or allergy information <i>(please tick)</i>	Peanut	Milk	Crustacean	Soybean	Fish
Can have 'may contain'? YES or NO	Celery	Nuts	Sesame Seeds	Mustard	Lupin
	Eggs	Molluscs	Gluten	Sulphites	*Other
	*Other – Please state				
Please provide details of the nature of the allergy/intolerance					
Has the allergy or intolerance been medically diagnosed? (Please provide evidence. This must be provided for RED students)					

Brooke Weston Trust uses a colour coding system to identify student requirements. Please tick which applies: **RED** –

student has had a severe reaction/anaphylactic shock to know food

AMBER – student has an allergy or intolerance

BLUE – student excludes foods due to lifestyle choice

For students that have been identified as **RED** a meeting may be necessary between the school and Parents to discuss the student's requirements and agreed actions. **Without this meeting we may not be able to cater for the student due to the unknown risk.**

Lifestyle – please provide details for dietary requirements based on lifestyle choices:

Parent/Guardian Details

Main contact name and relationship	
Main contact – phone number and email address	
Second contact – name and relationship	
Second contact - phone number	

Other Information

Has a photo ID form been completed and issued to the kitchen?		If EpiPen/ medicine is needed, who is the contact in school and is it kept on site?	
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Parent/Guardian Acceptance

Whilst we can provide meals which do not include allergens, we cannot guarantee that dishes may not contain traces of allergens, as these may be stored, prepared & cooked in the same kitchen as well as present in some ingredients from our suppliers due to production techniques.

I confirm that the information supplied is correct and will notify of any changes to the school and caterer immediately. I also understand that this information will be shared with others and displayed in the kitchen (photo & allergy)

Name	Signed	Date
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Agreed Actions		
<p>RED Category Student</p> <p>Plated Meal provided</p> <p>Packed lunch provided by the parent/guardian</p> <p>Student going home</p> <p>Other</p>		
<p>AMBER & BLUE Student - Please list suitable foods</p>		
<p>Any other relevant information</p>		
Head of Catering	Signed	Date
Catering Manager Name	Signed	Date