Mellors Allergen Policy

1. Policy Statement

Mellors Catering Services is committed to ensuring the safety and wellbeing of all customers, clients, and staff by managing food allergens effectively and complying fully with UK food safety legislation, including the Food Information for Consumers (FIC) Regulations, Natasha's Law and Benedict's Law. This policy outlines our approach to the identification, communication, and control of allergens in all food provided by Mellor's Catering Services.

2. Scope

This policy applies to all employees, subcontractors, temporary staff, and third-party suppliers involved in the preparation, handling, service, or sale of food across all Mellors Catering Services catering operations.

3. Legal Framework

This policy aligns with:

- Food Information for Consumers (FIC) Regulations 2014/ Food Information to Consumers, Regulation (EU) No. 1169/2011
- Retained EU Food Law, Regulation (EC) No. 178/2002
- The UK Food Information (Amendment) (England) Regulations 2019 (also known as Natasha's Law);
- School Allergy Safety Bill (also known as Benedict's Law).

4. Responsibilities

4.1 Parents/Carers Responsibilities

Parents/carers should let the school know about any special dietary requirements their child has, share any relevant medical information where available, and notify the school if there are any changes.

Drinks, food items or lunch boxes brought into school should be labelled with the name of the child for whom they are intended.

4.2 School Responsibilities

To produce and implement an Allergy Safety Policy to manage and minimise the risk of food allergies. A named senior leader should be responsible for the policy, which should be reviewed at least annually, published and displayed on the school website. This should include details of staff training, identification of pupils, staff or visitors with a food allergy, how the school manages incidents and "near misses", and storage of spare adrenaline devices and asthma inhalers.

To obtain information on pupils with special dietary needs and produce an Individual Healthcare Plan, with Allergy and/or asthma Action Plan attached when appropriate.

To ensure the school's Allergy Safety Policy and pupil's Individual Healthcare Plans (IHP) are made available to catering staff.

To provide allergy awareness and emergency response training to all staff present during times when pupils are scheduled to be on site, including catering staff.

To ensure pupils with special dietary requirements can be easily identified by both school and catering staff.

To ensure pupils with special dietary requirements are supported, fully included in school life and not unnecessarily excluded because of their allergy, and managed on school trips or holidays.

Schools must also support pupils with coeliac disease and food intolerances, usually through food avoidance, but this does not fall in scope of the school's allergen safety policy.

To make Mellor's Catering Services aware of any changes to the school's Allergy Safety Policy.

4.3 Mellors Catering Services Responsibilities

To provide information on food allergens to parents or carers and have this available for the child to be able to check independently when appropriate.

To ensure catering staff are trained to recognise the signs and symptoms of an allergic reaction, including anaphylaxis, understand how to respond and to report this.

To be available to meet with parents or carers to discuss provision of allergen safe meals.

To ensure that the 14 major allergens are clearly and accurately displayed for all Pre-Packed for Direct Sale (PPDS) and non-PPDS items.

To ensure that food containing a known allergen is not provided to a pupil with a confirmed allergy to that ingredient.

To work closely with the school to identify pupils with special dietary requirements and ensure this information is communicated clearly to all members of the catering team.

To read and adhere to the school's Allergy Safety Policy.

5. Allergen Identification

5.1 Definitions

5.1.1 Food allergy

A food allergy occurs when the immune system reacts to a food that is normally harmless. For most people, eating these foods causes no problems, but in someone with a food allergy, the immune system mistakenly identifies the food as a threat and triggers an allergic reaction. Symptoms can range from mild effects, such as itching or a rash, to more severe reactions, including anaphylaxis, which can cause breathing difficulties, collapse and, in some cases, be life-threatening.

5.1.2 Food intolerance

A food intolerance occurs when the body has difficulty digesting a particular food or ingredient. Unlike a food allergy, it does not involve the immune system and is not generally life-threatening. Instead, it typically causes unpleasant digestive symptoms, such as stomach pain, bloating or changes in bowel habits.

5.1.3 Coeliac Disease

Coeliac disease is an autoimmune condition in which eating gluten causes the immune system to react and damage the lining of the small intestine. This can affect the body's ability to absorb nutrients properly and may lead to a range of symptoms, including diarrhoea, abdominal pain and bloating.

Gluten is a protein found in wheat, barley and rye. It is therefore present in a variety of foods, including bread, pasta, breakfast cereals, cakes and some sauces and ready meals.

5.2 The 14 Major Allergens

Mellors Catering Services recognises the following 14 mandated allergens:

- Celery (including celeriac)
- Cereals containing gluten, such as wheat (including spelt and Khorasan wheat), rye, barley and oats
- Crustaceans, for example prawns, crabs, lobster, crayfish
- Eggs
- Fish
- Lupin, including lupin seeds and flour
- Milk (including lactose)
- Molluscs, for example mussels, oysters, snails and squid
- Mustard
- Nuts (almonds, hazelnuts, pistachio nuts, pecan nuts, walnuts, Brazil nuts and macadamia or Queensland nuts)
- Peanuts
- Sesame seeds
- Soya
- Sulphur dioxide / sulphites, if they are more than 10 milligrams per kilogram or 10 milligrams per litre in the finished product.

Anyone can be allergic to any food, not just the 14 major allergens. Therefore, where a pupil, staff member or visitor has a known allergy to a non-mandated allergen, this will be managed with the same level of care and control as the 14 mandated allergens.

Catering staff must check the full ingredient information, including product packaging and labels, when confirming whether a non-mandated allergen is present. Staff must not guess or make assumptions about ingredients and should seek further information where necessary; if accurate information cannot be confirmed, this must be communicated to the individual so they can make an informed choice.

6. Allergen Management and Cross Contamination Prevention

6.1 The Mellors Purple Allergen Management Folder

Clear allergen handling protocols for catering staff are detailed in the Mellors purple Allergen Management Folder and the ‘Safe System of Work – Food’ document on Grapevine. These include controls for delivery, storage, preparation, cooking and food service.

The purple Allergen Management Folder should be kept in the kitchen so it can be used each day to assist with allergen management.

All catering staff should read and sign the sign-off sheet in the folder.

The purple Allergen Management Folder should be used to store all Allergen Matrices and special diet menu plans.

6.2 Pre-Service Briefings

All food handlers must take part in a pre-service briefing before each service.

The briefing must be led by the Catering Manager, Head Chef or designated Allergen Champion, who will be identified on a clear and accessible front-of-house notice board.

Staff must be made aware of any pupils with special dietary requirements, including how they will be identified, their agreed meal options, how their meal will be served and who is responsible for serving them.

The briefing must confirm who the Allergen Champion is and where allergen information and records can be accessed within each service area.

Food handlers must understand how each dish should be served, including the correct portion size and any measures required to prevent allergen cross-contamination.

Any changes to products, recipes, menus or allergen information, including ingredient substitutions, must be communicated during the briefing.

Staff must be given the opportunity to check allergen records and the Allergen Matrix and ask for further advice or clarification before service begins.

6.3 HACCP controls for catering staff

6.3.1 Purchase/Delivery

Only authorised suppliers should be used.

Products that are damaged or with missing allergen information should be rejected due to the risk of contamination.

Catering staff must perform a detailed inspection of delivered items and their labels against the order sheet to screen for substituted/altered items and reject if necessary.

Rejected items should either be retained and disputed or returned, then disputes or rejections should be logged on Caternet.

6.3.2 Food Storage

Where products are decanted, retain the most recent packaging or label showing the product name, ingredients, allergen information and use-by/best-before date. Store this in the 'Product Labels' section of the purple Allergen Management Folder and discard any outdated labels.

Transfer opened dry ingredients still in the original packaging into clean, sanitised, airtight containers, or tie and wrap in cling film. Apply a completed Mellors Allergen Label when it is stated by the manufacturer to use the product within a specific time frame.

Ensure food that is being defrosted or has been prepared is securely covered and clearly labelled using a completed Mellor's Allergen Label.

Where the ingredients of a product have changed, keep the previous and replacement products separate, for example in different containers.

Where practical, store allergenic ingredients that could easily spill, such as flour, on lower shelves to reduce the risk of contamination.

6.3.3 Food Preparation

Review the standard menu and all special diet menu plans daily and provide affected pupils with an amended menu based on the allergy and dietary information provided.

Label all prepared food items with a completed Mellors Allergen Label.

Ensure all equipment is maintained in good condition and is clean and suitable for use.

Clean and sanitise work surfaces and equipment between different cooking/ food preparation tasks.

Clean up any spills immediately and dispose of any food that has become contaminated.

When preparing an allergen-free dish, ensure work surfaces and equipment have been thoroughly cleaned and sanitised first, even if they appear clean. Use a disposable cloth for cleaning work surfaces and allow equipment through the dishwasher to air-dry.

Where practical, prepare allergen-free and special diet meals first and, where space permits, use a designated area for their preparation.

Ensure allergen-free or special diet meals are protected from contact with the relevant allergen throughout cooking and reheating.

When preparing gluten-free bread, use a designated toaster or toaster bags, along with separate or thoroughly cleaned and sanitised utensils, chopping boards, knives and butter. Wrapped individual portions of butter may be used.

Where space and equipment allow, use dedicated and clearly labelled fryers for specific food types, such as fish and fish products, and ensure catering staff are aware of their use. Where a dedicated fryer is not available, pupils must be informed of foods previously cooked in the oil and any allergens that may be present, such as gluten, fish or egg.

When frying or using oil in recipes, if the oil may contain an allergen relevant to a pupil's allergy, an alternative suitable special diet meal must be provided.

Cool allergen-free and special diet meals separately to prevent allergen cross-contamination. Keep meals covered and clearly labelled with the food name, the pupil’s name and details of their dietary requirements.

Mellors recipes should be followed as specified, and ingredients should not routinely be added, removed or substituted. Where a change is necessary, the allergen content must be reviewed and any food labels and the Allergen Matrix updated accordingly. All catering staff must also be made aware of the change.

If a site wants to produce a special or a dish different to the Mellor’s recipe, such as for a theme day, this must be written down and added to the Allergen Matrix.

6.3.4 Food Service

An up-to-date Mellors Allergen Matrix should be available each day during service.

Where there must be a deviation from a special diet menu plan to ensure vulnerable pupils are not served items that they are allergic to, such as in the event of a delivery issue or change in product ingredients, this must be recorded on Navitas under Mellors Daily Kitchen Records and General Comments.

Catering staff should be prepared to respond to any customer enquiries about allergens.

Ensure front-of-house allergen notices are clearly displayed for customers, and that back-of-house Allergy Enquiry Flow Chart and list of 14 allergens are available to assist staff with enquiries.

There should be set-up controls behind the counter to ensure allergen-free meals are accurately labelled with the child's details, covered and stored, ready for service. These should be physically isolated from standard meals.

During service times, identify the pupils by the means agreed with the school.

Meals must be cross-referenced with the verified IHP before being served to pupils.

Wash hands regularly and before serving allergen-free meals to pupils with allergies.

If the kitchen is providing packed lunches for school trips, these must be individually sealed, clearly labelled with the pupil's name and cross-referenced with their IHP. They must then be transported separately from standard packed lunches.

The same protocols apply for other extended services, such as breakfast clubs, sports days or school parties, where Mellor's Catering Services are providing food. A fully updated Allergen Matrix should be completed for all non-PPDS food items served at the event.

6.3.5 Pack-out sites

The production site should ensure that all food items are labelled clearly and accurately, including allergen-free meals, and that an up-to-date Mellor's Allergen Matrix accompanies the food to the receiving site.

7. Communicating Allergen Information to Customers

Customers must be able to:

- Easily access clear and accurate allergen information.
- Have access to speak to a member of the kitchen staff, ideally the Catering Manager or Allergen Champion, to discuss their dietary requirements.
- Trust that allergen procedures are followed.

7.1 Front-of-house signage

It is important that we are aware of any food allergies or intolerances that pupils, staff or visitors may have. We encourage customers to inform Mellors Catering Services of any dietary requirements by displaying front-of-house allergen notices. These should be displayed in a clear and prominent location where customers are likely to see it before making their food selection or placing an order. The sign states:

“Here at Mellors Catering Servies, we produce food on site from fresh ingredients. Therefore, we cannot guarantee that our food may not contain traces of nut or other ingredients that some customers can have an allergy or intolerance to.

If you do have an allergy to certain foods or ingredients, please inform the catering staff, who will be able to advise you accordingly.”

7.2 Back-of-house signage

The Allergen Enquiry Flow Chart and list of 14 major allergens are displayed in a clear and prominent location within the kitchen to support catering staff with allergen enquiries. The Allergen Enquiry Flow Chart requires that:

- The Catering Manager or supervisor is best placed to answer enquiries and that staff should always check what ingredients are in a dish and never guess;
- Catering staff check the recipes and ingredients used to make the dishes, and whether these are suitable for the customer;
- Any special recipes created that are not part of the Mellors recipe list should be recorded and kept in the purple Allergen Management Folder;
- The packaging for any processed ingredients which are not fully homemade (e.g., fish fingers) should be cross-checked with the allergens to ensure the customer is given the correct information;

- The customer should be shown recipe information and product packaging, so they can make an informed choice about whether to eat the dish they have enquired about.

7.3 Food Labelling

7.3.1 Labelling Special Diet Meals

Where an allergen-free meal is produced for a pupil, this individual meal should be covered and labelled with the:

- Food name
- Pupil's name
- Dietary requirement

7.3.2 Non-PPDS Food Labelling

Under Benedict's Law, allergen information for food that is not prepacked must be clear, accurate and easily accessible to pupils and their parents or carers. This includes information about the presence of any of the 14 major allergens, as well as relevant Precautionary Allergen Labelling (PAL), such as "may contain" statements.

A physical copy of the Mellors Allergen Matrix must be completed and signed by 2 members of the catering staff (1 for lone working sites) to confirm that the information is accurate. Where a new Allergen Matrix is not completed daily, the existing Matrix must be carefully reviewed and checked each day against the ingredients and recipes being used. This is in case a recipe is changed, an ingredient is substituted or any other alteration is made that could affect the allergen information.

Each day before service, 2 members of the catering staff (1 for lone working sites) should approve the Allergen Matrix to be used during service by initialling the Allergen Management page within Mellor's Daily Kitchen Records on Navitas.

The completed Matrix must be made available to customers to support them in making an informed choice about the food they eat.

7.3.3 Pre-Packed for Direct Sale (PPDS) Food Labelling

This applies to food packed on-site before being offered to the consumer (e.g., sandwiches, salads, boxed meals).

Under Natasha's Law, any PPDS food must be clearly labelled with:

- The name of the food;
- A full ingredients list;
- Any of the 14 major allergens emphasised (e.g., bold, CAPS, or underlined).

PPDS labels display PAL information where applicable.

PPDS labels must be printed on the day the food item has been made and served to ensure suitability. This is because changes to recipe ingredients may affect the allergens present in the finished item.

While Mellors offers gluten free menu options for customers with a gluten intolerance or coeliac's disease, no products claim to be or are labelled as "gluten free" or "very low gluten".

8. Staff Training

All catering staff must complete allergen awareness training annually. Allergy awareness training must include:

- Understanding food allergies, intolerances and coeliac disease and the differences between them;
- Recognising the signs and symptoms of an allergic reaction, including anaphylaxis;
- Knowing where to find information on allergy triggers and identifying allergens in food and ingredients;
- Knowing how to check whether an individual is recorded as having a known allergy and how to access and follow their Allergy or Asthma Action Plan;
- Understanding the risks of allergen cross-contamination and how these can be prevented;
- Knowing how to communicate allergen information accurately and clearly to customers;

- Understanding the impact allergy can have on a child or young person's wellbeing;
- Understanding the labelling requirements under Natasha's Law;
- Awareness and understanding of Benedict's Law and its relevance to food allergy management;
- Understanding the school's Allergy Safety Policy;
- Understanding their responsibilities in preventing individuals with known allergies from coming into contact with the allergens they need to avoid;
- Understanding how to report an allergic reaction or case of anaphylaxis;
- Knowing how to respond appropriately in an emergency, including:
  - Contacting the emergency services and informing parents or carers.
  - Knowing where emergency medication is stored and how to administer it, including adrenaline for anaphylaxis and reliever inhalers for asthma attacks.
  - Receiving appropriate training in the use of emergency medication and devices, including prescribed medication and any school-held "spare" adrenaline devices.

9. Managing Allergen Incidents and Near Misses

An Allergen Incident is an event where a food or ingredient containing an allergen causes a physical or physiological reaction in an individual.

A Near Miss is an unsafe act, situation or food and drink issue that did not result in harm but had the potential to cause harm if the circumstances had been different.

Reporting and reviewing both allergen incidents and near misses are essential, as they provide an opportunity to identify what went wrong, learn from the event and make improvements to prevent a similar incident from happening in the future.

9.1 Recording Near Misses

Near Misses, including for allergens, should be recorded in the 'Food Near Miss Incident Report' form on Grapevine.

9.2 Managing Allergen Incidents

If alerted to an allergy incident, catering staff should act as follows:

- Call 999 immediately and follow advice given;
- Immediately make a member of school staff aware, if they are not already;
- Do not move the person;
- If the person has not notified you of an allergy already, ask them and their companions if they have an allergy, what it is and its severity. Share this information with the 999 operators;
- Ask the pupil or their companions if they carry an adrenaline pen, inhaler, or other medication, and assist to retrieve and administer it;
- Send someone outside to wait for the ambulance and stay with the pupil until help arrives;
- Inform the school so that the pupil's parent/carer can be notified;
- Inform the school and the Area Manager as soon as possible on the day the incident has occurred, for investigation.