



# **Manor Catering Food Safety and Allergens Policy**

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Reviewed: January 2023  
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# 1. General Statement Of Policy

- 1.1. Hardenhuish School is committed to providing food that is always safe to eat, with food safety of paramount importance.
- 1.2. It is our intention to consistently serve food that is prepared to the very highest standards using quality products and ingredients, complying with all relevant legal requirements, guidance and demonstrating industry good practice. Systems are in place to ensure hygienic practices are operated in safe working environments, inspiring confidence in our standards. We also expect similar high standards from our suppliers and their support in our delivery of an excellent food service.
- 1.3. Manor Catering's food safety strategy is revised on an annual basis to ensure our approach to compliance remains effective, encompassing new legal requirements and guidance. Food safety performance against our standards is routinely monitored.
- 1.4. Hardenhuish School's Food Safety provision includes:
  - 1.4.1. Providing safe and hygienic work environments;
  - 1.4.2. Co-operating fully with all external authorities to fulfil legal requirements;
  - 1.4.3. Implementing a food safety management system encompassing the principles of Hazard Analysis Critical Control Points and operating safe working practices;
  - 1.4.4. Clearly detailing and communicating food safety responsibilities;
  - 1.4.5. Providing an appropriate level of information, instruction training and supervision to enable employees to perform their role hygienically and effectively;
  - 1.4.6. Ensuring effective systems of traceability and recall within our food supply chain;
  - 1.4.7. Learning from food safety incidents by transparent reporting and thorough investigations to prevent reoccurrences;
  - 1.4.8. Assessing compliance standards and validating performance via a robust auditing programme;
  - 1.4.9. Providing clear information with regard to allergens in food prepared and sold by Manor Catering.

The Catering Manager reviews food safety performance at Hardenhuish School on a monthly basis, reporting any areas of concern to the Business Manager. This policy is reviewed annually.

# 2. Responsibilities

- 2.1. Food Safety Responsibilities:
  - 2.1.1. It is recognised that all employees in the Manor Catering team have food safety responsibilities. In addition, the Governors, Leadership Team and other key staff work with the catering team to ensure high standards of food safety.
- 2.2. Governing Body Responsibilities:
  - 2.2.1. Overall responsibility for all matters of food hygiene and safety;
  - 2.2.2. To act on information provided by the Headteacher to minimise significant food safety risks to ensure the safety of food produced and served;
  - 2.2.3. To provide adequate resources to ensure the continued sustainability of the management of food safety at Hardenhuish School;
  - 2.2.4. To ensure this policy is reviewed annually.

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### 2.3. Headteacher Responsibilities:

- 2.3.1. To delegate day to day implementation of food safety management to the Business Manager and Catering Manager;
- 2.3.2. To provide adequate budgetary provision to enable the school to fulfil legal food safety responsibilities and to promote a culture of compliance;
- 2.3.3. To review and instruct corrective actions to be taken to address significant reported risks identified in food safety performance data;
- 2.3.4. To communicate information on decisions affecting food safety made by the Governing Body and Leadership Team;
- 2.3.5. To take action on serious food safety risks as highlighted by the Catering Manager, Business Manager and Environmental Health Officer;
- 2.3.6. To seek the advice of the Catering Manager, Business Manager and Environmental Health Officer to inform and clarify decisions required to minimise food safety risks and promote a culture of compliance;
- 2.3.7. To ensure effective employee communication on food safety matters.

### 2.4. Business Manager Responsibilities:

- 2.4.1. To advise the Governors on the review of this policy on an annual basis;
- 2.4.2. To allocate resources as required for the effective management and maintenance of food safety;
- 2.4.3. To seek the advice of the Catering Manager and Environmental Health Officer to inform and clarify decisions required to minimise food safety risks and promote a culture of compliance;
- 2.4.4. To brief the Headteacher, Leadership Team and Governing Body on significant food safety matters regularly;
- 2.4.5. To ensure that food safety is included within supplier tenders;
- 2.4.6. To liaise with the Catering Manager to ensure effective allergen management when devising menus;
- 2.4.7. To assist the Catering Manager regarding liaison with the local Environmental Health Officer, officers from the Health and Safety Executive and other agencies on food safety matters;
- 2.4.8. To assist the Catering Manager in ensuring that all training requirements for the Manor Catering team are met;
- 2.4.9. To ensure employment contracts outline the requirement to adhere to school policies
- 2.4.10. To ensure job descriptions for all roles within the Manor Catering team have relevant food safety responsibilities included;
- 2.4.11. To assist the Catering Manager with monitoring sickness absences within the Manor Catering Team related to food illness/incidents or which could have an impact on food safety standards, and the outcomes of completed return to work interviews.

### 2.5. Catering Manager Responsibilities

- 2.5.1. To provide guidance to the Business Manager on implementation of this food safety policy, procedures, risk assessments and safe systems of work
- 2.5.2. To advise the Leadership Team and Governing Body on practical measures required to fulfil their food safety responsibilities and comply with statutory guidance;
- 2.5.3. To advise the Headteacher and Business Manager with regard to the annual review of this policy;
- 2.5.4. To report visits from Enforcement Authorities immediately to the Business Manager;
- 2.5.5. To liaise with the Business Manager with regard to ensuring training requirements are fulfilled and occupational health matters are addressed;

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- 2.5.6. To keep the Business Manager aware of any sickness absence within the Manor Catering Team related to food illness/incidents or which could have an impact on food safety standards, and the outcomes of completed return to work interviews;
- 2.5.7. To supervise Manor Catering team employees to ensure that food safety procedures, Hazard Analysis Critical Control Point (HACCP) Plans and hygienic practices are effectively implemented;
- 2.5.8. To ensure Manor Catering employees are issued with the required protective equipment and it is stored, maintained and used correctly to ensure food safety;
- 2.5.9. To ensure employees maintain high standards of personal hygiene;
- 2.5.10. To effectively communicate and consult Manor Catering team employees on food safety matters;
- 2.5.11. To identify any unsafe and/or unhygienic practices during daily visual checks and in completing monthly checklists and immediately to take remedial action;
- 2.5.12. To highlight the Business Manager and Headteacher in a timely manner any food safety matters that pose an imminent risk to health and to advise on corrective actions required;
- 2.5.13. To liaise with the local Environmental Health Officer and officers from other agencies on food safety matters;
- 2.5.14. To organise and ensure completion of food safety induction training for new members of the Manor Catering team;
- 2.5.15. To assess Manor Catering team employee training requirements on an ongoing basis and ensure they receive up to date food safety information;
- 2.5.16. To maintain food safety training records for members of the Manor Catering team;
- 2.5.17. To provide support to employees within the Manor Catering team on matters relating to food safety standards in order to rectify any issues arising;
- 2.5.18. To actively encourage new ideas of safer and improved ways of working from employees;
- 2.5.19. To take action to correct any unhygienic behaviours observed in the School's kitchens;
- 2.5.20. To consistently maintain good housekeeping standards;
- 2.5.21. To ensure systems are in place to receive up to date information on pupils and staff with allergies. To ensure this information is communicated to employees on a regular basis;
- 2.5.22. To inform the Business Manager of any food complaints received from the pupils, their parents or from staff. To investigate complaints and maintain a complaints log;
- 2.5.23. To advise on additional control measures required to prevent the reoccurrence of food illness/complaints;
- 2.5.24. To devise and advise the Business Manager on audit programmes to capture accurate food safety performance data;
- 2.5.25. To complete food safety audits on a periodic basis, reporting the results to the Business Manager and Health & Safety Committee, and ensuring that remedial actions are completed in a timely manner;
- 2.5.26. To manage the day to day relationship with suppliers with regard to food safety expectations, including ensuring that ingredient listings are accurate and kept up to date for the products supplied, identifying allergen information;
- 2.5.27. To investigate any food safety and food quality incidents with suppliers to prevent reoccurrences;
- 2.5.28. To complete training and obtain a satisfactory pass mark for the CIEH Level 3 or equivalent, Supervising Food Safety in Catering;
- 2.5.29. To complete training on Managing Food Safety and the Principles of Hazard Analysis Critical Control Points (HACCP);
- 2.5.30. To complete Hazard Analysis Critical Control Point Plans (HACCP) for specific school activities or events and ensure effective implementation;

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- 2.5.31. To maintain the allergens register;
- 2.5.32. To conform to the Allergens section of this policy;
- 2.5.33. To arrange for periodic deep cleaning of the kitchen and ventilation ducting;
- 2.5.34. To arrange for filters in the ventilation canopy to be removed on a quarterly basis for cleaning.

## 2.6. Estates Manager Responsibilities

- 2.6.1. To provide and maintain premises facilities and equipment in a satisfactory condition to ensure the safe preparation of food;
- 2.6.2. To act in a timely manner on any problems notified by the Catering Manager, acting immediately on any matter which has implications for food safety or legal compliance;
- 2.6.3. To provide and maintain an adequate supply of hot and cold water at safe temperatures to the kitchens and associated areas;
- 2.6.4. To provide and maintain satisfactory sanitary and personal washing facilities for Manor Catering team employees;
- 2.6.5. To provide and maintain adequate lighting and ventilation throughout catering areas;
- 2.6.6. To provide regular refuse collection, with adequate external receptacles for disposal and storage;
- 2.6.7. To repair and maintain the electricity and gas supply, testing gas appliances on an annual basis and electrical appliances as required to ensure legal compliance.

## 2.7. Manor Catering Team Employees (Including Agency and Bank Staff)

- 2.7.1. To perform all activities safely and hygienically, following school policies and procedures to protect the safety of food;
- 2.7.2. To take reasonable care to ensure food safety risks are minimised by following appropriate hygienic behaviours;
- 2.7.3. To maintain high standards of personal hygiene at all times;
- 2.7.4. To follow all food safety rules and guidance as directed by the Catering Manager;
- 2.7.5. To report anything that is wrong and could lead to service of unsafe food to the Catering Manager;
- 2.7.6. To protect food from contaminants by wearing and maintaining personal protective equipment, reporting any defects to the Catering Manager;
- 2.7.7. To launder their own uniforms on at least a twice weekly basis, ensuring that they are clean and not contaminated;
- 2.7.8. To report all food complaints or alleged food illnesses from customers or clients to the Catering Manager;
- 2.7.9. To report any sickness personally suffered to the Catering Manager prior to reporting for work at the school;
- 2.7.10. To complete induction training, implementing knowledge and skills learnt;
- 2.7.11. To complete training and obtain a satisfactory pass mark in Level 2 Food Hygiene and Safety;
- 2.7.12. To be aware of any food safety hazards and to advise the Catering Manager immediately, only taking action if it does not endanger their own safety or the safety of food;
- 2.7.13. To not interfere with any measures provided to protect the safety of food;
- 2.7.14. To make suggestions to improve food safety in the catering kitchens.

### 3. Allergens

- 3.1. Hardenhuish School (Manor Catering) recognises that a number of pupils, parents, visitors and staff may suffer from potentially life-threatening allergies or intolerances to certain foods and is therefore committed to a whole school approach to the care and management of those members of the School community. This policy looks at food allergy and intolerances in particular.
- 3.2. The School's position is not to guarantee a completely allergen free environment, rather to minimise the risk of exposure by hazard identification, instruction and information and to ensure compliance with the Food Information for Consumer Regulation (1169/2011) which came into force in December 2014. This will enable those with known allergens to make informed decisions on food choices.
- 3.3. The School is committed to proactive food allergy management through:
  - 3.3.1. The establishment and documentation of a comprehensive management plan for menu planning, food labelling, stores and stock ordering and customer awareness of food produced on site.
  - 3.3.2. Provision of awareness training for catering staff on food allergies/intolerances as well as recognition and treatment of possible symptoms (anaphylaxis).
  - 3.3.3. The purpose of this policy is to minimise the risk of any person suffering allergy-induced anaphylaxis or other symptoms of food intolerance as a result of food provided by Manor Catering.
- 3.4. Food Allergens - The 14 major food allergens are:
  - 3.4.1. Cereals containing gluten
  - 3.4.2. Celery including stalks, leaves, seeds and celeriac in salads
  - 3.4.3. Crustaceans, (prawns, crab, lobster, scampi, shrimps, etc.)
  - 3.4.4. Eggs
  - 3.4.5. Fish
  - 3.4.6. Soya (tofu, bean curd, soya flour)
  - 3.4.7. Milk
  - 3.4.8. Nuts (almonds, hazelnuts, walnuts, pecans, brazil nuts, pistachios, cashews, macadamia, nut oils, marzipan)
  - 3.4.9. Peanuts
  - 3.4.10. Mustard
  - 3.4.11. Sesame Seeds
  - 3.4.12. Sulphur dioxide/sulphites (found in dried fruit, fruit juice drinks, etc.)
  - 3.4.13. Lupin seeds and flour (found in some bread and pastries)
  - 3.4.14. Molluscs, (mussels, whelks, oysters, land snails and squid)

The allergy to nuts is the most common high-risk allergy but it is important to understand that any allergen can be life threatening for a person that is allergic to that foodstuff.

#### 3.5. Definitions

- 3.5.1. **Allergy:** a condition in which the body has an exaggerated response to a substance (e.g. food or drug), also known as hypersensitivity
- 3.5.2. **Allergen:** a normally harmless substance that triggers an allergic reaction in the immune system of a susceptible person

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- 3.5.3. **Anaphylaxis or Anaphylactic Shock:** a sudden, severe and potentially life-threatening allergic reaction to a trigger (food, stings, bites, or medicines). Anaphylaxis may occur within minutes of exposure to the allergen, although sometimes it can take hours.
- 3.5.4. **Adrenaline device:** a syringe style device containing the drug adrenaline. This is an individual prescribed drug for known sufferers which is ready for immediate intramuscular administration. This may also be referred to as an Epi-Pen/Ana pen or Jext which are brand names.

### 3.6. Bidfood Menu Planning Software

- 3.6.1. In order to plan balanced, healthy menus with complete assurance with regard to allergens and to ensure compliance with the Food Information Regulations 2014, Hardenhuish School uses Saffron menu planning software.
- 3.6.2. This software is accessed via a web portal, displaying the nutritional and allergen profiles of all food served by the school. It allows the 14 primary allergens and sub-allergens to be identified at stock, recipe and menu level, providing customers with the allergen information required to make informed choices.

### 3.7. Allergen Register

- 3.7.1. The Catering Manager maintains an allergen register related to current school menus which can be found on the school website, enabling all pupils, parents and staff to check for allergens in specific dishes. This register will change in line with menu changes. The school is fully compliant with Natasha's Law and will implement updates as they occur. Please see Appendix 1 for information regarding Natasha's Law.

### 3.8. Responsibilities with regard to Allergens Management:

#### 3.8.1. **Health & First Aid Officer** is responsible for:

- 3.8.1.1. establishing an individual care plan for pupils with allergens in consultation with parents and other relevant staff;
- 3.8.1.2. effectively communicating care plans to all relevant staff and departments, including the Catering Manager;
- 3.8.1.3. ensuring posters with the photos and names of affected pupils are available in departmental offices;
- 3.8.1.4. providing an annual briefing to all staff on the symptoms of anaphylaxis and action to be taken;
- 3.8.1.5. arranging anaphylaxis training for key school staff, such as the Catering Manager, staff who lead school trips and other offsite activities, including awareness of triggers and procedures to be followed in the event of an emergency;
- 3.8.1.6. maintaining a stock of adrenaline devices in the Medical Room.

#### 3.8.2. **Pupils and Parents** are responsible for:

- 3.8.2.1. Pupils and parents are responsible for informing the school of any known allergies that the pupil has;
- 3.8.2.2. Susceptible pupils are responsible for ensuring that they have their medication with them at all times.



**3.8.3. Catering Manager** is responsible for:

- 3.8.3.1. only authorised suppliers and being the controlling point and contact for all purchases of food stuffs for the school catering function;
- 3.8.3.2. ensuring the authorised suppliers are aware of the Hardenhuish School's Allergens Policy and statutory labelling requirements, in particular identification and labelling of food stuffs containing allergens;
- 3.8.3.3. avoiding the use of food stuffs that may contain nuts and clear labelling if food stuffs containing nuts are used;
- 3.8.3.4. being aware of pupils and staff who have food allergies;
- 3.8.3.5. making sure all Manor Catering staff are aware of food stuffs containing allergens;
- 3.8.3.6. making sure all Manor Catering staff are aware of pupils and staff who have food allergies.

**3.8.4. Data Manager** is responsible for:

- 3.8.4.1. The Data Manager is responsible for ensuring that all allergen information is recorded on the pupil records on SIMS which are in turn linked to pupil smartcards.

**3.8.5. All Staff** are responsible for:

- 3.8.5.1. All staff have a responsibility to ensure the welfare of pupils within their care. This is particularly relevant when pupils are out of school on an educational visit or other offsite activities when packed lunches are required. Trip leaders are responsible for providing the names of pupils requiring packed lunches so that Manor Catering staff can cross check for allergen and dietary intolerances and label packed lunches accordingly as well as highlighting these pupils to the trip leader so that he/she is aware in the event that food is also being bought off site.
- 3.8.5.2. Staff are responsible for informing the Catering Manager if they suffer from food allergies so that appropriate food options can be made available for them.

**3.8.6. Visitors** are responsible for:

- 3.8.6.1. It is important that allergen information is accessible to all parties who visit the site and consume food produced by Manor Catering. When hosting visitors or booking external events, the member of staff booking the hospitality catering will establish if any of the visitors have any food allergies/intolerances. This information will then be passed to the Catering Manager to allow for the planning of appropriate menus and selections of food.

**3.9. Information on Allergens**

Manor Catering Department also holds information outlining the contents of all dishes being served which can be referred to on request. Please see Appendix 1 for an example Allergens register. The current Allergens register at any given time will be available from Manor Catering as well as being published on the school website.

## 4. Appendix 1

### 4.1. What is Natasha's Law?

In July 2016, 15-year-old Natasha ate a Pret a Manger artichoke, olive and tapenade baguette bought at Heathrow Airport. Unknown to her, sesame seeds had been baked into the bread. Due to her sesame allergy, Natasha sadly died of anaphylaxis after collapsing onboard a flight shortly afterwards.

This tragedy may have been avoided if clear legislation was already in place, ensuring all food sold to the public is labelled with every ingredient. Instead, Natasha was 'reassured' by the lack of any allergen information on the product when she chose it.

Under the previous Food Regulations, there was no requirement to individually label freshly made, pre-packaged food. This meant Pret a Manger didn't have to list all ingredients on their food product labels. Instead, they had signs near displays prompting consumers to raise any allergen queries with staff. However, this changes with the introduction of Natasha's Law.

From October 2021, **food pre-packed for direct sale (PPDS) must list all ingredients on food labels of individual products.** Natasha's Law will apply to all businesses in the UK. For more information on what are Prepacked for Direct Sale (PPDS) foods.

Environment Secretary Michael Gove announced the law in a move to protect England's 2 million food allergy sufferers; Natasha's Law will give consumers greater transparency about what they are eating. This is something that will benefit everyone, and, most importantly, help to prevent potentially life-threatening allergic reactions.

### 4.2. Current Allergen Labelling Law:

Until Natasha's Law comes into force, the current EU regulations remain in place during the period of transition.

- 4.2.1. Food prepared for sale on the same site as the preparation does not need to be labelled individually
- 4.2.2. Pre-packed food prepared for sale away from site already needs to be labelled
- 4.2.3. That labelling needs to include a full ingredient list and have allergens highlighted within the ingredient list.
- 4.2.4. Information for food made on-site for sale on-site does need to be available – just not by labelling each item. A reference menu or some other sort of signage is required.
- 4.2.5. After October 2021, all pre-packed food (e.g., sandwiches, salads, pastas), whether for sale on-site or off-site, will need to have:
  - 4.2.6. A full list of ingredients and
  - 4.2.7. All allergens highlighted in the ingredients list
  - 4.2.8. Irrespective of being sold on-site or off-site from where it is prepared

### 4.3. What Allergens need highlighting for Natasha's Law?

There are 14 allergens that need to be highlighted. (Some people may be allergic to other ingredients that do not need mandatory highlighting, but these are intended to be identifiable from the ingredient list.) The allergens are:

- 4.3.1. Celery (including celeriac) and
- 4.3.2. Cereals containing Gluten (including Wheat, Kamut, Spelt, Barley, Oats)
- 4.3.3. Crustaceans (i.e., Shellfish including Crab, Shrimp, Prawn, Lobster, Langoustine)

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- 4.3.4. Eggs
- 4.3.5. Fish
- 4.3.6. Lupins (Used in some baked goods as seed or flour)
- 4.3.7. Milk (including lactose products)
- 4.3.8. Molluscs (Whelks, Mussels, Snails)
- 4.3.9. Mustard
- 4.3.10. Nuts (specifically tree nuts): Hazelnuts, Cob Nuts, Almonds, Brazil Nuts, Pistachio Nuts, Pecan Nuts, Queensland Nuts, Walnuts
- 4.3.11. Peanuts
- 4.3.12. Sesame (Tahini)
- 4.3.13. Soya (Soy & Soybean)
- 4.3.14. Sulphur Dioxide or sulphites (must be declared in concentrations of more than 10mg (about the weight of a grain of table salt)/kg or 10mg (about the weight of a grain of table salt)/liter)

#### 4.4. How should Natasha's Law Allergens be highlighted

If the EU FIC Regulations do not apply to you, you need to understand how they work so you can implement the changes required to meet Natasha's Law:

- 4.4.1. You indicate your allergens within your ingredient list.
- 4.4.2. You should not label allergens in addition anywhere else from the ingredient list on your product.
- 4.4.3. It is a misconception that allergens must be highlighted in bold.
- 4.4.4. Natasha's Law increases the scope of the EU Food Information to Consumers Regulations. As such, highlighting the allergens can be done using any suitable method:
  - 4.4.4.1. Bold
  - 4.4.4.2. Italic
  - 4.4.4.3. UPPERCASE
  - 4.4.4.4. Coloured
  - 4.4.4.5. Or any combination
- 4.4.5. You must declare how you are highlighting your allergens in your ingredient list.
- 4.4.6. You can declare how you are highlighting at the start or the end of the ingredient list
- 4.4.7. Your ingredient list may need to be in QUID order
- 4.4.8. Your ingredients must be legible and meet the minimum font size (7pt on your computer)

#### 4.5. What Will Natasha's Law Require Food Businesses from October 2021?

Natasha's Law applies in England, Wales, Scotland, and Northern Ireland. It is always strongly recommended that you are transparent about all ingredients and allergens that you are putting into your products. If you rely on verbal information, there is always the possibility of this being incorrect or of customers not asking and assuming the food is safe. Having all ingredients clearly listed is just one way that we can provide more reassurance to those with allergies and food hypersensitivity.

##### 4.5.1. Caterers

For caterers, Natasha's Law will impact if the business produces single items in packaging that are ready for presentation to the consumer before it is ordered or selected. It does not include food packaged in larger quantities (such as platters of sandwiches covered in clingfilm). For event caterers this may mean changes to

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labelling for prepacked foods such as sandwiches, salads, and other products. As always, food provided by a caterer should adhere to food law and be safe to consume. Therefore, caterers supplying food to an event should provide allergen information to enable consumers to make safe and informed food choices. It is worth noting that if a consumer were to take food away with them in a 'doggy bag' this would not need a label on the principle that the food had already been ordered. Allergen information must be available to consumers prior to ordering, and this can be provided verbally.

#### 4.5.2. Kitchens

No matter what type of food business you operate in, in all kitchen environments, all staff should take care in the preparation of food to ensure there is no cross contamination. For products which carry a label, this is especially important to ensure labelled products do not mislead the customer by containing an ingredient or allergen that is not listed.

Staff should all have an awareness of allergens and there should be a kitchen culture of checking for allergens in the products they use. Often, ingredients can run out, or be substituted by suppliers. In instances where alternative ingredients are used, kitchen staff should check the new constitution of the product, and all labels should be thoroughly checked and updated as required. All staff members should be informed of the changes and customers should be informed where appropriate.

The consequences of mislabeling food can be as severe as death by anaphylaxis, as was the case for Natasha. Staff must understand why having an awareness of allergens is necessary and what they must do to keep consumers safe. This includes knowing where to find the correct, up-to-date ingredients list of products and sharing this information with customers when requested.

#### 4.5.3. Have a system in place for quickly responding to ingredient changes.

As soon as a recipe changes, so too do your ingredients, and you need to alter the labelling process to match this. For example, if a soup recipe changes to contain celery, you need to update the ingredients label as soon as the product goes on sale. You should also make it clear that the recipe has changed, such as in writing on the product label. Some customers may have previously checked that celery wasn't an ingredient and bought the soup, so may not check the ingredients again.

#### 4.5.4. Keep your staff informed.

If you change the ingredients in a product, you must inform staff of this as soon as it happens. This updated information should be stored somewhere that all colleagues have easy access to. If a customer then has a query, they can easily refer to the product information.

#### 4.5.5. Clearly signpost allergen information.

Although you will have to include a list of all ingredients in products, this should not mean you take down allergen signs. Customers are likely to still have allergen or ingredient queries, and showing you are clued up and willing to discuss them can be incredibly reassuring.

The FIR requirements regarding allergen information in respect of other forms of non-prepacked foods, such as foods which are not packaged and those packed at the consumer's request, are unaffected by these changes. This is because unpackaged food does not have packaging in order to place a label on, and the other is packaged in front of the consumer at their request. The changes bring consistency of allergen

information between PPDS and prepacked foods.

Consider whether the mode of emphasis

- 4.5.5.1. Is sufficiently visible
  - 4.5.5.2. Is readable for those with visual impairments? For example, consider individuals with colour blindness when using contrasting colours.
  - 4.5.5.3. A minimum font size where the x-height (as illustrated in Annex IV of the FIC) is 1.2 mm or more must be used where labelling surface is 80 cm<sup>2</sup> or more.
  - 4.5.5.4. A minimum font size where the x-height is 0.9 mm or more must be used where the labelling surface is less than 80 cm<sup>2</sup>. Figure 1 below illustrates how the x-height of the font used is measured. Figure 1: How to measure x-Height 1 (of your font)
- 4.5.6. Example PPDS food includes:
- 4.5.6.1. Sandwiches placed into packaging by the food business and sold from the same premises.
  - 4.5.6.2. A café giving away packaged samples of a new range of cakes they have made on the same premises.
  - 4.5.6.3. Foods packaged and then taken by the same operator to their market stall to sell.
  - 4.5.6.4. A butcher who makes burgers or sausages which are prepacked to be sold on the same premises.
  - 4.5.6.5. Foods packed by a food business to be sold in its retail units located within the same building complex as the premises where the food was packed such as a train station, hospital, university, or holiday park. In a retail environment such as a supermarket, the following examples would also be considered to be prepacked for direct sale food, provided they are packed on the premises from which they are being sold before they are offered for sale:
  - 4.5.6.6. Fresh pizzas from the deli counter e.g. on a cardboard tray and wrapped in plastic;
  - 4.5.6.7. Boxed salads;
  - 4.5.6.8. Hot foods such as rotisserie chicken;
  - 4.5.6.9. Foods that are pre-weighed and packed such as cheese or meats from a delicatessen counter or baked goods from an in-store bakery

## 5. References and Resources.

Further advice on food allergen labelling is available on the Agency's website:

[www.food.gov.uk/business-guidance/allergen-labelling-for-food-manufacturers](http://www.food.gov.uk/business-guidance/allergen-labelling-for-food-manufacturers)

FSA allergen resources at [www.food.gov.uk/allergen-resources](http://www.food.gov.uk/allergen-resources)

1Think allergy posters and chef cards can be found here: [www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses#allergeninformation-resources](http://www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses#allergeninformation-resources)

Free online training about the Food Information Regulation can be found here:

<http://labellingtraining.food.gov.uk/>

Food and Drink Federation Gluten Labelling Guidance: Best Practice for Prepacked Foods which Include or Exclude Cereals Containing Gluten (June 2019):

[www.fdf.org.uk/corporate\\_pubs/FDF-gluten-labelling-guidance.pdf](http://www.fdf.org.uk/corporate_pubs/FDF-gluten-labelling-guidance.pdf)

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Committee: Resources

British Retail Consortium & Food and Drink Federation Guidance on “Free-From” Allergen Claims (November 2015): [www.fdf.org.uk/corporate\\_pubs/brc-free-fromguidance.pdf](http://www.fdf.org.uk/corporate_pubs/brc-free-fromguidance.pdf)

**Relevant Legislation:**

Regulation (EU) No. 1169/2011 on the provision of food information to consumers (“FIC”): [www.legislation.gov.uk/eur/2011/1169/contents](http://www.legislation.gov.uk/eur/2011/1169/contents)

Regulation (EU) No. 828/2014 on the requirements for the provision of information to consumers on the absence or reduced presence of gluten in food: [www.legislation.gov.uk/eur/2014/828/contents](http://www.legislation.gov.uk/eur/2014/828/contents)

Regulation (EC) No. 178/2002 laying down the general principles and requirements of food law (General Food Law): [www.legislation.gov.uk/eur/2002/178/contents](http://www.legislation.gov.uk/eur/2002/178/contents)

Food Safety Act 1990 and subsequent amendments: [www.legislation.gov.uk/ukpga/1990/16/contents](http://www.legislation.gov.uk/ukpga/1990/16/contents)

Food Safety (Northern Ireland) Order 1991 and subsequent amendments [www.legislation.gov.uk/nisi/1991/762/contents/made](http://www.legislation.gov.uk/nisi/1991/762/contents/made)

The Food Information Regulations 2014 (“FIR”): [www.legislation.gov.uk/uksi/2014/1855/pdfs/uksi\\_20141855\\_en.pdf](http://www.legislation.gov.uk/uksi/2014/1855/pdfs/uksi_20141855_en.pdf)

The Food Information (Wales) Regulations 2014: [http://www.legislation.gov.uk/wsi/2014/2303/pdfs/wsi\\_20142303\\_mi.pdf](http://www.legislation.gov.uk/wsi/2014/2303/pdfs/wsi_20142303_mi.pdf)

The Food Information Regulations (Northern Ireland) 2014: [http://www.legislation.gov.uk/nisr/2014/223/pdfs/nisr\\_20140223\\_en.pdf](http://www.legislation.gov.uk/nisr/2014/223/pdfs/nisr_20140223_en.pdf)

The Food Information (Amendment) (England) Regulations 2019: [www.legislation.gov.uk/uksi/2019/1218/pdfs/uksi\\_20191218\\_en.pdf](http://www.legislation.gov.uk/uksi/2019/1218/pdfs/uksi_20191218_en.pdf)

The Food Information (Wales) (Amendment) (No. 2) Regulations 2020: [www.legislation.gov.uk/wsi/2020/295/pdfs/wsi\\_20200295\\_mi.pdf](http://www.legislation.gov.uk/wsi/2020/295/pdfs/wsi_20200295_mi.pdf)

The Food Information (Amendment No. 2) Regulations (Northern Ireland) 2020: [www.legislation.gov.uk/nisr/2020/80/pdfs/nisr\\_20200080\\_en.pdf](http://www.legislation.gov.uk/nisr/2020/80/pdfs/nisr_20200080_en.pdf)

Regulation (EU) No. 1308/2013 establishing a common organisation of the markets in agricultural products: [www.legislation.gov.uk/eur/2013/1308/contents](http://www.legislation.gov.uk/eur/2013/1308/contents)