Aspens Allergen Policy

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

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

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

Policy Statement

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

- Work closely with our supply chain to ensure accurate information on all products that may contain allergens.
- Maintain a database of all our recipes, clearly listing ingredients and highlighting those containing allergens.
- Work closely with our clients in assisting in the support of 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.
- Work close with Worcestershire Regulatory Services in the development of company policy and procedures.
- Aspens is proud to be a corporate partner of the Natasha Allergy Research Foundation and actively promotes Allergy School to our clients.

V5 April 2025

Responsibilities

The Directors of the Company will:

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

The QHSE Department will:

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

The Food Department will:

- Effectively communicate the Allergen Policy and procedures to all stakeholders.
- Ensure that all menu cycles are supported with accurate recipes and allergen information.
- Ensure that all recipes have the relevant allergen information.
- Ensure that suppliers provide accurate allergen information for products on the Company Approved Product List (APL).
- Ensure that any changes to products and recipes are communicated to all relevant Managers.
- Manage the labelling systems to ensure compliance with Natasha's Law
- Provide allergen safe menus for primary schools
- Support with the completion of menus for students with more complex dietary requirements.
- Provide additional support at Unit level where necessary with regards to menus.
- Work with Added Value Enterprises (AVE) in managing the supply chain with regards to allergens.

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

- Ensure that allergen policy will be implemented during mobilisation as outlined in the arrangements section.
- Ensure that all units have implemented the Company Allergen Policy and Procedures.
- Where necessary, with the Catering/Chef Manager, meet with Parents of **RED** category students to discuss and agree requirements where appropriate.
- Ensure a copy of this policy is shared and explained with the client.

- Discuss with the Client any issues concerning the means in which information regarding students with allergens is communicated to the Catering/Chef Manager, the identification of them, *and* agreeing a solution to ensure that the allergen procedures can be fully implemented. Agreed actions will be recorded in writing, using the Alternative Menu Form where applicable.
- Ensure that the client is kept informed of the outcome of any meetings with parents concerning special diets.
- Ensure that all checks and audits are completed by the Catering/Chef Manager and is reviewed to ensure compliance with this policy
- Ensure all training is completed and up to date.
- Investigate any breaches to this policy within 1 working day of notification.

The Catering Manager/Chef Manager will:

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

All Company Employees will:

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

The School/Academy will:

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

The Parent/Guardian/Carer will need to:

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

The Student will:

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

Arrangements for Schools/Academies & Colleges

It is important that everyone in the company understands they have a responsibility and accountability in the implementation of these arrangement in order to keep all students safe.

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

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

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

It is our legal obligation to provide accurate allergen information about the foods that we produce and service. However, in order to ensure student safety, it is necessary for the school to provide up to date and accurate information of students that have allergies or intolerances.

Due to current labelling regulations we do not claim to be a peanut/nut free environment, which creates a false sense of security.

Within primary schools we do not use products that contain nuts as an ingredient, as well as products that manufacturers declare a '*may contain declaration.*'

Within secondary schools we do not use products that contain nuts as an ingredient, however, will on occasion use products with a '*may contain'* statement or '*produced in a factory that handles nuts.'* These products are not suitable for students with nut allergies.

This will only be changed, such as 6th Forms, with written confirmation from a client.

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

The successful implementation of the Allergen policy requires the support and cooperation of Company Directors, Food Team, Operation Managers, Catering Managers/Chef Manager, all employees, The School/Academy, The Parent/Guardian/Carer and the Students.

This policy must be read in conjunction with the Allergens Guide and Allergen HACCP Booklet

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

Primary Schools

In order to ensure *that* the safety of students the following procedures categorises students depending upon their needs:

- **RED** severe reaction/anaphylactic symptoms disclosed.
- **AMBER** food/allergen intolerance
- **BLUE** excludes foods due to lifestyle preference.

- **RED** may have an agreed menu with the meal being plated.
- **AMBER** will be a suitable meal served from the counter.
- **BLUE** will be a suitable meal served from the counter.

Prior to the beginning of each term the school must provide the Catering/Chef Manager with written confirmation of the allergen and special diet requirements for the students that have allergies or dietary requirements. For new intake students this information needs to be provided by the end of July to allow sufficient time to identify student dietary requirements before September. In addition, the school must provide this information for new students or any changes throughout the year. Without written information it may not be possible to safely feed a particular student or only offer a limited menu choice.

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

If a student is categorised as **RED,** depending on the allergy, then a member of the Operations team/Catering/Chef Manager may need to meet the parents/guardian/carer to discuss the students' needs and agreed actions in other to minimise any risk: this may result in an individual allergen safe menu being agreed for the child.

The company offers two category of allergen safe meus, which are managed by the Food team. These are:

Allergen safe menu(s) which is free from the 14 legal allergens and aligned as closely as possible with the main menu

Bespoke – if sits outside the 14 then a menu tailored to their needs (one choice only)

If a bespoke menu is required, it will be assessed by the food team/AVE based on a risk assessment. The risk analysis looks at the students' requirements, the capability of the kitchen and school environment. To determine the risk level. If the risk level is high it may not be possible to safely provide a meal, and this will be discussed with the parent/guardian and school/academy as soon as possible.

All bespoke menus are provided by the Food Team and signed off by AVE Head of Nutrition; this will include the menu and supporting recipes. This should be doubt checked and then agreed with the parent/guardian.

Under no circumstance must a bespoke menu be complied by anyone else. For further details please refer to the Guide to Allergen, Lifestyle & Medical Diet Provision in Schools.

All information to be documented on the Alternative Menu Form and include permission to share any information with the catering team. As each stage is completed the Special Diets Procedure Tracker is signed off. Until this process has been completed the student may only be offered a safe meal such as jacket potato and fruit or are to supply their own packed lunch.

In order to ensure that this information is clearly communicated to all of the catering team, it should be transferred on to the Student Dietary Requirements Summary Chart for staff to refer back to.

Category Controls for RED students with individually agreed menus

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

The Catering /Chef Manager must communicate to the kitchen when food for **RED** category students is being prepared. Where possible this should be in a separate area, if this is not possible then separated by time from other foods containing allergens. Prior to preparation the area and all equipment must be thoroughly cleaned using the 2-stage cleaning method and/or dishwasher to prevent cross contamination.

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

Once completed the meal (main course and dessert) must be plated and double wrapped in cling film, clearly labelled with the student's name, year group 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 Catering/Chef Manager's responsibility to check the dish before service to ensure that it is correctly covered and labelled.

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

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

The Allergen Safe Diet Double Check Sheet must be signed by the person who has prepared the meal, a person who has checked and the person who has served the meal. A master copy of this can be found in the Unit Allergen Folder or on the company intranet. These must be retained for 6 weeks.

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

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

AMBER & BLUE Controls

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

Delivered Services

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

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

Secondary Schools/Colleges

In secondary schools to support this transition, the company does not prepare managed medical diet menus for secondary age pupils. Instead, our focus is on supporting pupils with medical dietary needs so that they can make safe choices. To support the secondary student to take control of their medical dietary needs, we make sure we:

- Adhere to strict food safety regulations – including transparency around the presence of the 14 legal allergens in every dish on our menus
- Encourage pupils to ask our teams about allergens

In secondary school's student information needs to be entered on the till system allowing student dietary requirements to automatically be identified at point of sale.

General Food Production and Service

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

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

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

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

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

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

Allergen Matrices and Labelling

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

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

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

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

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

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

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

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

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

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

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

Hospitality Catering

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

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

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

If the hospitality is taking place during normal service times, then an A5 Hospitality sign needs to be displayed and the allergen matrix in the service area for reference.

Hospitality bookings outside of normal service times or in remote locations then the completed, accurate allergen matrix must be sent.

Mobilisation of new business

Due to the nature of the business Company's work the Company will take on the management of existing workplaces and employees, (via TUPE) it is important that a mobilisation procedure is followed to ensure that all new students' dietary requirements are identified prior to the go live date. In order to achieve this the following process must be followed:

- Allergen policy and alternative menu form shared and discussed with the client.
- Current student allergen information received from the school (this does not need to be on the company form)
- Set up Allergen Folder set up

Primary schools

- Students categorised (RED, AMBER, BLUE) and actions identified and recorded
- Allergen menus or bespoke menus completed for students.
- Parent meeting arranged, where necessary
- Student identification process discussed and agreed with the client.

- All staff briefed on unit procedures, student identification, special diets arrangements and allergen matrix

Secondary schools

- Till system reviewed and checked for student information
- Understanding of how the till system information is maintained (via SIMS or manual input)
- All staff briefed on unit procedures, student identification, special diets arrangements and allergen matrix

Checks and Audit.

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

Members of the Operation Team will make spot checks on regularly visits, any issues must be recorded and addressed immediately.

Allergen Investigation

Any Allergen incident or near miss must be report by the Catering/Chef Manager to their Operations Manager immediately. The QHSE Department must all be informed the same day. The incident must also be recorded on mpro5 via the Near Miss/Incident report flow.

All incidents must be investigated by a member of the Operations Team (with support by other departments) within 1 working day of the incident occurring, in order to establish the immediate, underlying and root causes of the incident. This includes a review of procedures in place, employee knowledge and training and compliance with procedures. Once completed the findings will be communicated to all relevant parties and any required action taken.

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

Training

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

Allergen Introduction Training

All employees are sent this are part of their onboarding before starting work.

- Introductions to Allergens
- The importance of allergen management

Grow PRO e-learning Allergen Safety Training

As part of the company's role specific induction programme all employees complete the Grow PRO e-learning Allergen Safety training within the first week of employment. The training includes:

- The 14 major allergens
- Living with an allergy including symptoms and allergies and intolerances
- How to help someone suffering from an allergic reaction
- Managing allergens in the kitchen
- Managing allergen during service
- Company processes

Once completed a 10 question multiple choice test must be passed to check knowledge and understanding. The pass mark is 90%. Employees have 3 opportunities to pass the test before being referred back to the L&D. The L&D Department will notify the Regional Operation Director, Regional Operations Manager and Operations Manager of those employees that have failure the test after 3 attempts. The Operations Manager must establish the circumstances and provide additional training support before requesting the test be reset. In some circumstances if the test is not past then an employee may not pass their probation.

Company Allergen Safety Policy and Procedures

This training is completed by all member of the operational team. This training is conduction online in person. This includes:

- Company Allergen policy and Unit procedures, company recipes and allergen matrices.
- Roles and responsibilities in dealing with allergens,
- Primary school Red, Amber and Blue category students and relevant procedures
- Risk of cross contamination when storing preparing and serving foods and relevant controls.
- Supporting documentation

Unit Allergen Procedures

Training for all unit based employees on local allergen procedures.

Refresher Training

Grow PRO e-learning refresher allergen training completed yearly by all operational and unit employees.

TAKE-10

Short awareness training completed on site by all unit employees (once a year at the winter term menu change).

Allergen Management Level 3

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

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

Documentation

Copies of all relevant documentation can be found in the Unit Allergen Folder or as electronic versions in mpro5 and the Document Library via the Internet. These documents are kept up to date by the relevant Departments.

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