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# Allergen Guidance Project Update

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## **National Guidance for Managing Allergens in Schools**

### **CONCEPT**

Good, safe practice should be an **industry standard**

### **AIM**

To generate a **nationally-agreed guidance document** for the management of allergens in education catering

**To support caterers in education to cater with confidence and serve children safely**



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# The Guidance

1. Understanding the legal requirements
2. Roles and responsibilities of key stakeholders & communication best practice
3. Allergen Management

## UPDATES:

❖ Now with copyright

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❖ Will go live on LACA website Mid-August and be in public domain



## Allergen Management Guidance for Catering in Education

**Aims**  
The LACA Allergen Management Guidance for Catering in Education aims to support schools, caterers and understanding the best practice for caterers in education with regards to managing allergens safely.

This documentation relates only to allergies and does not cover other special diet requests such as: disorders, sensory disorders, autoimmune diseases, lifestyle choices, cultural and religious diets.

- Objectives**
- To clarify the legal requirements of special diet provision in schools
  - To set out the roles and responsibilities of key stakeholders
  - To define what is safe and reasonable when catering for special diets in schools
  - To provide supporting tools for all stakeholders for the safe management of allergens in schools
  - To provide a national safe standard for catering in education with regards to allergens

### Definition of terms

**Medical or Special Diet:** intolerances. This document disorders, cultural and re

**Caterer:** Refers to the co catering services

**School:** Refers to the Pri school receiving catering involving younger childre

**Parent:** Refers to the par

## 2. Roles and responsibilities of key stakeholders and communication best practice

LACA identify three key parties which must co-operate to support the management of special diets, namely:

1. The School
2. The Parent/Guardian of the pupil
3. The Caterers

Brief summaries of the areas of responsibility so far considered for each party are as follows:

	School	Parent	Caterer
Notification of allergy or intolerance	<ul style="list-style-type: none"><li>• Collect special diets information of pupils' in their school with food allergies and intolerances.</li><li>• Share this information with the caterer.</li><li>• Provide details of special diets in advance of a new term with sufficient notice as per the caterer's policy. This will enable the caterer to fulfil their responsibilities outlined below. Failure to provide sufficient notice may result in a delay to special diet provision.</li></ul>	<ul style="list-style-type: none"><li>• Inform the school of their child's food allergy/intolerance prior to the beginning of the school term (or as soon as possible) after diagnosis or symptoms.</li><li>• Provide a medical note to evidence the food allergy/intolerance. This must be from an NHS professional/medical establishment. *</li></ul>	<ul style="list-style-type: none"><li>• Liaise with the school at the end of the preceding term to obtain information on those pupils with special dietary requirements.</li></ul>
Communication	<ul style="list-style-type: none"><li>• Schools are the data controllers.</li><li>• Keep allergen information up-to-date throughout the year and ensure the caterer always has the most up-to-date data.</li><li>• Communication between parents and caterers must involve the school at every step.</li><li>• Communication between stakeholders should be in writing and not just verbally provided.</li></ul>	<ul style="list-style-type: none"><li>• Ensure communication is with the school and not just the caterer throughout the process.</li><li>• Provide schools with the information required in a timely manner and when requested.</li><li>• Communication between stakeholders should be in writing and not just verbally provided.</li></ul>	<ul style="list-style-type: none"><li>• Ensure the school is kept up-to-date with special diet menus and process.</li><li>• Do not communicate with parents without involving the school.</li><li>• Communication between stakeholders should be in writing and not just verbally provided.</li></ul>
Implementation & management of a special diet	<ul style="list-style-type: none"><li>• Ensure the school has a method of identification when pupils following a</li></ul>	<ul style="list-style-type: none"><li>• Approve special diet menus when provided.</li></ul>	<ul style="list-style-type: none"><li>• Ensure all team members are adequately trained on</li></ul>

4

7 Pages  
3 Sections



## 1. Understanding the legal requirements

### 1.1 Legal requirements

The provision of special diets in schools is not legally defined. Advice from the Department for Education, however, states that schools should make reasonable adjustments for pupils with particular requirements, for example to reflect medical, dietary and cultural needs (School food in England, Advice for governing boards, March 2019). It is the responsibility of the school and/or caterer to decide if provision of a special diet meal is feasible and reasonable efforts should be made to cater for all pupils needs. It is recommended that all schools develop a policy and have a clear procedure to make sure all requests for a special diet are handled efficiently and appropriately. Schools may reject an application for a request if a risk assessment indicates that food could not reasonably be produced which would be safe for a pupil.

### 1.2 Free School Meals

If a child qualifies for Universal Free School Meals and the caterer cannot reasonably produce food which would contact the school/local authority to discuss alternative options for food

(2014) it is a legal requirement that any out of home catering provider consider the presence of the 14 EU defined allergens. This information can be in menus. Under the new 'Natasha's law' (effective from 2021) all pre-takeaway declarations.

parents/guardians in understanding the information wherever language

environment there are many factors to consider, however the safety of the food is the top priority. Due to complexities in these scenarios it is not always possible to provide a special diet meal. This decision is never to single out pupils, but solely based on what is operationally safe to provide.

schools and caterers will be required to process pupil and parent data, including names, addresses and photographs. All data handling must be conducted in line with the GDPR.

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schools, caterers and parents/guardians

Separation of multiple recipes  
Separation of ingredients  
Separation of storage & layout  
Separation of counter space  
Separation of storage space  
Separation of fryer capacity  
Separation of utensils  
Separation of storage & layout

Large pack sizes for special diet ingredients (storage, cost, waste)  
Delivery Errors & Substitutions  
Delivery Damage  
Allergen presence in kitchen  
Manufacturing or labelling errors  
Ingredients not fully declared on packaging  
Allergens outside of 14 FIR\* not declared on ingredient packaging  
May contain allergen warnings  
Unknown ingredients brought in from home by customers

**Limitations affecting School Kitchen Capability**

**Cleaning**  
Accidental spillages & breakages  
Limited washing facilities for utensils/equipment

Short term Agency Staff  
Short & fast-paced service periods  
School lunchtime assistant support level  
Management of allergens/food consumption in dining hall

\* 14 allergens which must be declared by law under the Food Information Regulations (FIR)



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## Feedback so far...

"The document looks great and I think **it will greatly benefit everyone.**"

"It is really good to see the progress that has been made in **bringing together all of the information from the groups** into one working document"

"**thorough and an easy** working document."

"I think it is looking like a document that **will benefit all parties concerned.**"

"We think it is **comprehensive** policy."

"The draft document looks **excellent**"

"**It's great to see** how well this has **progressed**"

"This looks **amazing**"

"I thought it was **really positive**"



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# Risk Analysis Process

1. School Support & Engagement
2. Kitchen Capabilities
3. The Allergy

## UPDATES:

- ❖ Survey underway
- ❖ Now with copyright

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- ❖ Access online, controlled by LACA member login

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**Allergen Management Guidance - Appendix 1**

**Allergen-Managed Special Diet Menu - Risk Analysis Process Tool for Schools and Caterers**

The purpose of this risk analysis process is to provide caterers with a framework to assess the risk status of delivering a special diet request safely. Scores should be used as part of discussions with the school, parents/guardians, and pupil and not as the sole basis for decision making. The final decision with a special diet will be based on a whole range of factors.

Complete the questions below, considering the school's policies and the scores to determine the risk level.

Questions are scored on a scale of 1-3\* with 1 being the lowest risk and 3 being the highest risk.  
\*Questions may be assigned a score of 5 with a score of 5 being the highest risk.

#	Question	Score
School		
1	Are the school pro-actively taking the lead on special diet & allergen management?	
2	Has up-to-date medical evidence been provided by the parent/guardian confirming the allergy(ies) /intolerance(s)?	
3	Does the school have a method to identify pupils/customers with allergies or intolerances?	
Kitchen		
4	Are all catering staff trained in allergen management?	
5	Does the kitchen have separate workspace/worksurfaces for preparing allergen-controlled meals?	
6	Are one or more of the allergens typically present in the kitchen?	
7	Does the kitchen have a dedicated allergen management ambassador/allergen champion?	
Allergens		
8	Has the pupil been assigned an Adrenaline auto-injector (AAI, EpiPen or Emora pen) for their allergy?	
9	Does the request include allergen information outside of the 14 legally defined allergens? If YES, continue to answer Q10 If No, skip to Q11	
10	Does the request include allergens which are not whole food ingredients?	
11	How many allergens are required to be restricted/removed?	
TOTAL SCORE		

4	Are all catering staff trained in allergen management?	1	3	All staff should have completed allergen and special diet training in full as stipulated by any applicable company policy. Training for school lunchtime assistants and midday supervisors should also be considered in line with applicable school and catering company policies.  If answering 'No', training must have been completed prior to any special diet menu support commencing.
Kitchen				
5	Does the kitchen have separate workspace/worksurfaces for preparing allergen-controlled meals?	1	2	Kitchens should always be compliant with food safety controls for the avoidance of cross-contamination.
6	Are one or more of the allergens typically present in the kitchen?			
7	Does the kitchen have a dedicated allergen management ambassador/allergen champion?			

10	Does the request include allergens which are not whole food ingredients?	5*	2	For the purpose of this risk analysis process, whole food ingredients are simple food ingredients which can be easily identified in a recipe.  Footnote 6 provides examples of allergens which are not considered as whole food ingredients.  *A higher score of 5 is assigned to recognise the significant additional risk.
11	How many allergens are required to be restricted/removed?	1 = 1 2 = 2 3 or more = 3		
TOTAL SCORE		-	-	Sum the scores to generate a total score. Determine the risk level for the special diet request using the 'Total score risk indicator'.

### TOTAL SCORE RISK INDICATOR

Score	Risk Indicator	Guidance
12 - 14	LOW RISK	Special diet provision is likely to be reasonable when prepared in line with the school and caterer's allergen management policies
15 - 23	MEDIUM RISK	Special diet provision may be reasonable when prepared in line with the caterer's allergen management policy
24 - 35	HIGH RISK	Special diet provision is very unlikely to be reasonable when prepared in line with the caterer's allergen management policy and strongly advise alternative food provision is made.

HIGH

MEDIUM

LOW

Risk Rating

Under the guidance of a medical professional therefore medical evidence is an essential part of the special diet menu support.

Representation from a professional medical source i.e. a medical doctor, registered professional, school-composed care plans, private commercial laboratory should not be accepted.

In order to make any adjustments to a previously agreed special diet menu, the school must consult with the caterer.

It is the school's responsibility to ensure that the special diet is safe and suitable for the pupil and that it meets the best practice for schools.

Management of allergens and special diets as part of their safeguarding responsibilities. The school should ensure that the caterer is aware of the school's allergen management policy and that the caterer is aware of the school's allergen management policy and that the caterer is aware of the school's allergen management policy.

Between the school & the catering team



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## Road-testing the Risk Analysis



**94%** applied it to **Primary** settings (6% Nursery)



**94%** agreed it would **support in communicating the risks** to parents & schools



**15%** High Risk  
**66%** Medium Risk  
**17%** Low Risk



**50%** Contract Caterer  
**40%** Local Authority  
**10%** In house caterer



**75%** agreed or strongly agreed with the **risk outcome**

Of those who disagreed, there is an **even split** between those who thought the outcome should have been **higher** and those who thought **lower**





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## Reviewing Risk

“It will definitely support us in assessing whether it’s safe to cater (for a pupil)”

“It looks holistically at all risk factors”

“Its definitely been an eye opener for me”

“(the process would...) clearly identify measures which could be taken to reduce the risk to an acceptable level”

# Road-testing the Risk Analysis

## Usability

“Quick and easy to use”

“It is useful, but suggest some more in-depth questions to ensure the detail is covered”

“We still can use some common sense”

“Given us a good opportunity to review our processes”

## Communication with schools & parents

“Gives us clear backing for not accepting requests that are not accompanied by medical evidence”

“It could also be used to promote change required within schools to lower risk”

“The process would open up a framework for discussion and negotiation with the school and parent”



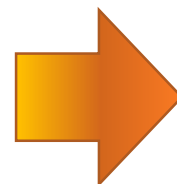
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# **ALLERGEN GUIDANCE: IMPACT**

**Incorporate into  
caterer policies  
nationwide**



**Consistent support  
for Schools,  
Caterers & Parents**



**Ensure children  
with medical diets  
can enjoy eating  
SAFELY at school**