

Policy for Managing Allergies, Intolerances and Medical Diets

1.0 Overview

This policy provides information on the management of medical diets and requests for ingredient information. Also, refer to Pabulum's Medical Diets Request Policy available on Pabunet.

Medically prescribed special diets can include:

- Food allergies
- Food intolerances
- Coeliac Disease
- Requests for nutritional information e.g., carbohydrate counts or fat content
- Other

Food Allergies

Food allergies involve the body's immune system. The body reacts to certain allergens in food by producing antibodies, which can cause immediate and sometimes severe symptoms such as swollen lips or eyes, vomiting, skin hives and in extreme cases difficulties breathing and a severe fall in blood pressure (anaphylactic shock). This can prove fatal. The only way people that suffer from a food allergy can avoid a reaction is to avoid the food that they are allergic to.

Food Intolerances

This does not involve the immune system in the same way and is not usually as severe as a food allergy. Symptoms usually take longer to appear and may include headaches, fatigue, and digestive problems.

Coeliac Disease

Coeliac disease is an auto-immune disease where eating Gluten triggers the immune system causing damage to the gut lining. Symptoms can include bloating, diarrhoea, tiredness, and anaemia. Customers with Coeliac Disease must exclude Gluten from their diet. Gluten is a protein found in foods such as wheat, rye, barley, and oats.

Type 1 Diabetes

Type 1 Diabetes is an auto-immune disease that attacks the cells in your pancreas that make insulin, so you cannot produce any insulin at all. This can lead to a buildup of glucose (sugar) in the blood which can be dangerous.

People who suffer from Type 1 Diabetes need daily injections of insulin to keep their blood glucose under control. They need to monitor their intake of carbohydrates to calculate their insulin dose and therefore require carbohydrate content information for all foods they consume. (Source the National Health Service).

2.0 Legislative Requirements

Since December 2014, it has been a legal requirement for food businesses to identify 14 allergens detailed in EU Regulation No.1169/2011 on the provision of food information to consumers (FIC) and the Food and Information Regulations 2014 (refer to Figure 1 below) and provide information to the customer on the presence of these allergens in the food that they sell.

This means Pabulum must provide reliable and documented information on the 14 allergens in the food that we sell.

Figure 1: The 14 Allergens

													
Celery	Cereals containing gluten**	Crustaceans	Eggs	Fish	Lupin	Milk	Molluscs	Mustard	Nuts*	Peanuts	Sesame seeds	Soya	Sulphur dioxide

Source: The Food Standards Agency available at www.food.gov.uk

2.1 Labelling of Food that is Pre-Packed for Direct Sale

In accordance with the Food Labelling Regulations that came into force on 1st October 2021 pre-packed foods for direct sale will be labelled with the following information:

- The name of the food.
- The ingredients list with the 14 allergens required to be declared by law.
- The statement 'For information on allergens this product may contain, please ask a member of staff'

In addition, to the product label, the following allergen/intolerance customer sign must be displayed at tills and service counters. Pabulum encourages customers to speak with a member of staff should they have additional queries about the food they are purchasing, such as precautionary may-contain statements.



3.0 Responsibilities

Employees are responsible for following this policy and the training and instruction they are provided.

Unit Managers and Operations Managers are responsible for ensuring all food handlers involved in the preparation or service of food, understand the risks involved; how to avoid them and the importance of giving accurate information. Unit Managers will train their staff to be aware of any customers, including children, that have a known food allergy or intolerance.

Clients: It is the responsibility of the client to provide Pabulum with up-to-date and accurate information regarding pupils that require a medically prescribed diet.

Customers and Parents/Guardians: It is the responsibility of the customer (except young children) to request information on ingredients from Pabulum employees before purchasing their food.

4.0 Primary and Secondary School Menus

4.1 Primary School Menus

Primary school menus showing what allergens are present in each food item are available to download from our website at www.pabulum-catering.co.uk.

The Pabulum allergen key is as follows:

- Celery and Celeriac (C)
- Crustaceans (CR)
- Eggs (E)
- Fish (F)
- Gluten (G)
- Lupin (L)
- Milk and Milk Products (MK)
- Molluscs (MO)
- Mustard (MU)
- Nuts (N)
- Peanuts (P)
- Sesame (SE)
- Soya and Soya products (SO)
- Sulphites and Sulphur Dioxide (SU)

Precautionary '*may contain*' statements provided by our suppliers are represented by lower-case letters.

4.2 Standard Secondary School Electronic Menus

All secondary school sites must have printed copies of the recipes and allergen matrices for each dish that they sell. This information must be available if requested by customers.

Electronic secondary school menus will show the 14 allergens for dishes in the main lunch menu. These will be available to download from our website at www.pabulum-catering.co.uk.

Daily specials may also be available on-site and allergen information for these items can be obtained by asking a member of staff.

4.3 Pabulum's Enjoy Offer

A growing number of secondary schools are moving to our Enjoy food offer which provides pupils with the choice of different food destinations at the service counter including:

- Great British Classics
- Asian
- Afro Caribbean
- Italian
- Mexican
- Indian

Our Enjoy Executive Chefs work with the school to tailor the food offered to meet customer requirements and have greater autonomy over the food they sell each day to meet the specific needs of their site. Therefore, electronic menus showing the 14 allergens are not available.

Allergen ingredient information for all foods can be obtained by asking a member of staff.

5.0 Procedure for Primary, Secondary and Non-Educational Sites

5.1 Primary School Procedure	
Item	Controls/Arrangements
Medical Diet Requests	<ul style="list-style-type: none"> ▪ The safety of our customers is paramount and as such medical diet requests must be considered on a case-by-case basis. ▪ Reasonable efforts will be made to accommodate a medical diet request where Pabulum concludes it can be done safely. ▪ In some cases where our risk assessment concludes that the risk to the customer is high, Pabulum will be unable to provide a medical diet. ▪ In determining the risk to the customer, Pabulum will have regard to LACA guidance and in particular: <ul style="list-style-type: none"> ▪ LACA Allergen Management Guidance for Catering in Education and the LACA Risk Analysis Process.
Religious, Cultural and Lifestyle Non-Medical Diet Requests	<ul style="list-style-type: none"> ▪ A Medical Diet Request form must not be completed for religious, cultural and lifestyle dietary requests. ▪ This information must be passed by the school directly to the Unit Manager. ▪ The Unit Manager must brief the catering team on non-medical dietary requirements. Each request will be considered on a case-by-case basis and where necessary appropriate arrangements put in place. ▪ Information on foods that are made from vegetarian and vegan ingredients is available from our electronic primary school menus which can be downloaded from www.pabulum-catering.co.uk
Obtaining Information on Medical Diets	<p>Parents/Guardian and School Responsibilities</p> <ul style="list-style-type: none"> ▪ It is the responsibility of the parent/guardian to provide the school with their child's dietary requirements. ▪ It is the responsibility of the school to inform Pabulum of pupils who require a medical diet. <p>Unit Managers Responsibilities</p> <ul style="list-style-type: none"> ▪ At the start of a new contract and the start of every term thereafter the Unit Manager is to: ▪ Consult with the client to confirm relevant medical diet information has been provided for pupils requiring a school meal. ▪ Obtain the details of the client's point of contact in the event of an emergency such as a suspected allergic reaction and instruct staff in these arrangements.

	<ul style="list-style-type: none"> ▪ Confirm with the client the name and details of each customer with a medical diet. ▪ Keep a record of this information within the kitchen and store it securely. ▪ Send a copy of this information to specialdiets@pabulum-catering.co.uk ▪ Return information on medical diets containing personal data which is no longer needed (including photographs of pupils) back to the client for secure disposal.
<p>Medical Diet Request Process</p>	<ul style="list-style-type: none"> ▪ A Medical Diet Request form must be completed for pupils requiring a medical diet. ▪ Parents/guardians must email completed forms to specialdiets@pabulum-catering.co.uk or post to Special Diets, Pabulum Limited, Linea House, Harvest Crescent, Fleet, Hampshire, GU51 2UZ. ▪ On receiving a Medical Diet Request form, our Nutritionists will process the information and will contact all parties (Unit Manager, client, and parents/guardians) to confirm whether we can accommodate the dietary request. ▪ Unit Managers must not provide food to a pupil requiring a medical diet without following the Medical Diets Policy.
<p>Arrangements Whilst a Medical Diet Request is Processed</p>	<ul style="list-style-type: none"> ▪ Pabulum’s Nutritionists will require up to 15 working days to process a medical diet request. ▪ During this period parents/guardians should provide a packed lunch. ▪ In some circumstances, jacket potatoes, with toppings, salad and fruit can be provided but only where this is compatible with the pupil’s medical requirements and where confirmed and agreed with a Pabulum Nutritionist.
<p>Recipes and Allergen Matrices</p>	<p>Recipes and Allergen Matrices</p> <ul style="list-style-type: none"> ▪ Only approved standard recipes can be used. ▪ Recipes and allergen matrices are available electronically from the Recipe Manager section of Pabunet. <p>Unit Managers must ensure</p> <ul style="list-style-type: none"> ▪ The most up-to-date recipes and allergen matrices are available for all foods sold at the site under their control. ▪ Recipes are available in hard copy format in all production kitchens. ▪ Recipes are followed without deviation and staff have been

	<p>informed that they are not allowed to add any additional ingredients or toppings to the food.</p> <ul style="list-style-type: none"> ▪ Allergen matrices are available at all service points including kitchen service areas, sixth form service areas, food cubes and any other point of service. ▪ Recipes and allergen matrices that are no longer in use are destroyed to prevent their accidental use and the potential to provide inaccurate ingredient information to customers.
<p>Primary School Daily Service Briefings</p>	<p>Service Briefings</p> <ul style="list-style-type: none"> ▪ Communication is an essential element when managing medical diets. Each day, it is essential that staff are aware of what allergens are within the food being served. ▪ Pre-populated daily briefing sheets are available from an Excel spreadsheet on Pabunet. Unit Managers are to print these daily to carry out a service briefing. <p>Unit Managers must ensure</p> <ul style="list-style-type: none"> ▪ Information within the daily briefing sheet is communicated to all serving staff before the service takes place. ▪ They periodically test the knowledge of staff by asking questions afterwards. ▪ Staff sign the attendance box. ▪ If the digital Daily Briefing Sheets cannot be accessed a blank sheet is to be used and populated using the allergen information available from recipe cards or allergen matrices. ▪ Daily briefing sheets are kept for 6 months. After this period, they should be disposed of securely.
<p>Recognising Customers with Medical Diets at the Point of Service</p>	<ul style="list-style-type: none"> ▪ Staff must be able to identify the customer at the service counter. ▪ The client is responsible for providing and implementing a system to enable catering staff to identify pupils that require a medical diet. This must include one or more of the following: <ul style="list-style-type: none"> ▪ Lanyards with a photograph and dietary information displayed (preferred method). ▪ Coloured wristbands (however, these can be obscured or swapped with other children). ▪ Photographs, care plans and documented dietary requirements. ▪ Dietary information on cashless till systems.
<p>Storage of Medical Diet Information</p>	<ul style="list-style-type: none"> ▪ The personal data of customers must be stored securely. This must include all medical information, and identifiers such as names and photographs.

	<ul style="list-style-type: none"> ▪ Store in a special diets folder that can be made available during service. The folder must be stored securely when it is not in use to prevent unauthorised access to the information within it. ▪ If special diet information is displayed at service counters it should not be visible to customers. ▪ Special diet information that is no longer required must be handed back to the client to be destroyed. Staff are not allowed to dispose of documents with personal data in general waste receptacles
Foods Containing Tree Nuts or Peanuts	<ul style="list-style-type: none"> ▪ Primary schools in general do not allow the use of tree nuts or peanuts in school lunches. ▪ It is company policy that we do not intentionally use ingredients containing tree nuts/peanuts in primary schools. ▪ It is company policy that we do not intentionally use ingredients labelled with a precautionary 'may contain' tree nuts or peanuts statement. ▪ Employees must not bring to work food or other items e.g., hand soap, that contain tree nuts or peanuts.
Allergen Awareness Menu	<ul style="list-style-type: none"> ▪ From January 2024, pupils registered with Pabulum who must avoid one or more of the 14 named allergens (apart from fish) will be fed from the Allergen Awareness Menu. ▪ It is vital staff must follow the Allergen Awareness Menu procedure available on Pabunet.

5.2 Secondary Schools Procedure	
Subject	Control
Medical Diet Request	<ul style="list-style-type: none"> ▪ Medical diet menus will not be produced by Pabulum's Nutritionists for pupils within secondary schools. ▪ All customers are encouraged to speak with a member of staff if they require ingredient information. ▪ Further information is available by contacting specialdiets@pabulum-catering.co.uk
Recipes and Allergen Matrices	<ul style="list-style-type: none"> ▪ Unit Managers must ensure the most up-to-date recipes and allergen matrices are available in hard copy for all items sold. ▪ Allergen matrices must be available at all service points and must include all foods that are offered for sale.
Customer Questions Outside of the 14 Mandatory Allergens	<ul style="list-style-type: none"> ▪ The allergen matrix, recipe, or, the original food packaging, must be checked to obtain accurate information before answering a customer query. ▪ We are not legally obliged to provide information on food allergens other than the mandatory 14 allergens. However, we

	<p>must take reasonable steps to provide information where it has been requested. If this is not possible, inform the customer that we cannot provide the information they need and offer alternative food which meets their dietary requirements.</p> <ul style="list-style-type: none"> ▪ When providing dietary information to customers employees must not guess or take a chance or intentionally provide incorrect information. ▪ Pabulum’s Nutritionists can provide further information regarding food allergens and medical diets including: <ul style="list-style-type: none"> ▪ Ingredient information outside of the 14 allergens. ▪ Carbohydrate counts for customers with Type 1 Diabetes. ▪ Fat content per portion for customers with medical requirements.
Cashless Till Systems	<ul style="list-style-type: none"> ▪ Some cashless till systems will be used by the client to display the dietary requirements of customers, at the point of purchase. It is the responsibility of the client to ensure that the dietary information on this system is correct. ▪ Serving staff must check that the food the customer is attempting to buy is compatible with their dietary requirements. ▪ The till operator must manually check the allergen matrix before completing the purchase. ▪ If the product contains something to which the customer is allergic or intolerant, it must not be sold to the customer. ▪ If the allergy/intolerance is outside the main 14 allergens, staff must check the recipe cards and/or ingredient packaging information. If this cannot be done, the foods should not be served, and the customer should choose an alternative food item compatible with their dietary requirements.

6.0 Staff Training

All staff must understand their responsibilities and the controls we have in place to manage medical diets. The table below provides information on mandatory company training:

Training	Details
Allergen Awareness Module	<ul style="list-style-type: none"> ▪ All food handlers must complete this module before starting work. ▪ Refresher training will be provided at a set interval and will be administered by Human Resources.

Policies, Recipes and Matrices	<ul style="list-style-type: none"> ▪ New food handlers and relief staff will be instructed/trained in our allergen procedures and will not take responsibility for serving food until authorised by a competent member of staff.
Training Records	<ul style="list-style-type: none"> ▪ Training/instruction must be documented on training record cards.

7.0 General Allergen Management Controls

Step/Item	Control
Purchasing	<ul style="list-style-type: none"> ▪ Pabulum’s approved suppliers provide product specifications that include the mandatory 14 allergens. This data is used in the formation of recipes and allergen matrices. ▪ Cash purchases are only permitted in exceptional circumstances if approved by an Operations Manager e.g., due to the loss of gas/electrical supply. ▪ For approved cash purchases a trained employee must check the product labelling to identify allergen ingredient information. ▪ Employees are not permitted to bring food to work from any other sources.
Recipes (Available to download from Pabunet)	<ul style="list-style-type: none"> ▪ All approved menu items must have a recipe card. The recipe card will provide information on: <ul style="list-style-type: none"> ▪ The product codes for ingredients used in a dish. ▪ The method of preparation. ▪ Allergen information. ▪ Recipes cards must be followed precisely. Allergen ingredient information contained within recipe cards is dependent on ordering the correct product code. ▪ NEVER add in additional ingredients or toppings which have not been approved by the Executive Development Chef and/or Nutritionists. This could introduce a food allergen that will not be included in our allergen information. This could be life-threatening for a customer with a food allergy. ▪ Hard copy recipe cards <u>must</u> be printed and available for use at every service location. ▪ In every production kitchen, recipe cards must be present for all menu items produced. ▪ Staff are to be instructed on how to use recipe cards. ▪ Old recipe cards <u>must</u> be discarded at the start of a new menu cycle.
Allergen Matrix (Available from Pabunet)	<ul style="list-style-type: none"> ▪ Unit Managers must ensure they have the most up-to-date allergen matrix available. Available from Pabunet.

	<ul style="list-style-type: none"> Allergen matrices must be available at all service points before and during food service. Staff must be instructed on how to interpret and use allergen matrices to provide accurate information to customers. Old allergen matrices must be discarded to prevent their accidental use.
Customer Signage (available from Marketing)	<ul style="list-style-type: none"> Customer special dietary requirements signs must be displayed in all primary, secondary, colleges and Business & Industry sites. Signs must be displayed at all service points and till points. Unit Managers/Supervisors will check these are displayed before service when walking the customer journey. Additional signage can be ordered from Marketing.
Gluten-Free Food	<ul style="list-style-type: none"> A selection of pre-packed Gluten-Free food is available from the approved buying list. Medically Prescribed Diet Request forms must be completed before providing Gluten-Free foods. Gluten-Free food must be kept in its original packaging and within a clean lidded container. The container must not have been used before to store food containing Gluten. Store separately and above Gluten-containing foods. Gluten-Free pasta is to be cooked in a clean container separately from food containing Gluten.

8.0 Allergen Cross Contamination Guidance

Excluding an allergen from food is the only control to prevent a person with an allergy or intolerance to a particular food, from having an adverse reaction. Minimising the risk of allergen cross-contamination at all stages of our food activities is therefore essential. The following describes good practices used to minimise the risk of allergen cross-contamination.

Step	Controls
Delivery	<ul style="list-style-type: none"> Check for damaged packaging and reject foods where necessary. Check deliveries to ensure orders are correct and food has not been substituted. In primary schools' foods containing nuts or peanuts must be rejected.
Food Storage	<ul style="list-style-type: none"> Store food in the original packaging and retain allergen labelling. Store foods such as flour, sugar etc. in lidded containers and kept labelled. When storing food prepared in-house, it must be covered and labelled with a durability date and a description of the food.

	<ul style="list-style-type: none"> Decanted food must be labelled with the name of the food. Food utensils must be clean before use.
Recipes	<ul style="list-style-type: none"> Follow approved recipes without deviation. Do not add in additional ingredients or toppings which are not listed within the recipe. Do not use old or archived recipes. Primary schools: Allergen Awareness Menu (AAM) recipes, must be used for the Allergen awareness Menu only. These recipes must be kept in the designated red AAM folder.
Preparation and Cooking	<ul style="list-style-type: none"> Allergen-free foods must be prepared separately from food containing the allergen that is being avoided. Food probes must be cleaned correctly between uses. Staff must be aware that used cooking oil in fryers may contain food allergens that have been introduced from foods previously fried. Clean equipment/utensils must be used to prepare food. Equipment must be cleaned in a commercial dishwasher where available. Equipment and surfaces that cannot be cleaned in a dishwasher must be cleaned using a two-stage cleaning process.
Employees	<ul style="list-style-type: none"> All staff must wear clean company-approved uniforms. All staff must wash their hands following Pabulum's handwashing procedure. Gloves must be changed at the same time hands are required to be washed. Staff are not permitted to bring food to work that contains tree nuts or peanuts. Staff are not permitted to store personal food within food preparation areas.
Food Service	<ul style="list-style-type: none"> Separate clean serving equipment/utensils must be provided for each dish. Serving utensils must not be used for other food dishes as this could result in allergen cross-contamination.
Primary Schools Self-Service	<ul style="list-style-type: none"> The Salad Cart is made up of simple salads which do not contain any of the 14 allergens. Pupils who are allergic to gluten, milk, soya, and eggs must not consume bread from the table.
Product Recall	<ul style="list-style-type: none"> Allergen alerts issued by the Food Standards Agency or by our suppliers will be communicated to all affected units. Unit Managers will be informed to withdraw relevant products and must follow the instructions given.

Reporting Allergen Incidents and Near Misses	<ul style="list-style-type: none"> ▪ All food incidents which involve allergic reactions, special diets, near misses or complaints must be investigated and reported using the Food Incidents Form available from Pabunet. ▪ Unit Managers are responsible for ensuring the form is completed and sent to their Operations Manager and the Head of Food, Health & Safety within 24 hours of an incident occurring.
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9.0 Allergens, Intolerances and Special Diets Questions and Answers

A customer asks for information about the 14 mandatory allergens	<ul style="list-style-type: none"> ▪ Refer to the allergen matrix or recipe card and provide the customer with the correct information. ▪ NEVER guess, take a chance, or intentionally provide incorrect information.
A query about an ingredient that is not one of the 14 mandatory allergens	<ul style="list-style-type: none"> ▪ We are not legally obliged to provide information on food allergens other than the 14 allergens mentioned above. But we must take reasonable steps to provide the information requested. ▪ Unit Managers must consult recipe cards and/or ingredient packaging where practicable. If this is not possible, inform the customer that we cannot provide the information they need and offer alternative food. ▪ Ingredient information can be obtained by emailing Pabulum’s Nutritionists at specialdiets@pabulum-catering.co.uk.
A parent/guardian contacts me for dietary advice	<ul style="list-style-type: none"> ▪ Ask the parent/guardian to complete Pabulum’s Medically Prescribed Diet Request form or send their query to Pabulum’s Nutritionists by emailing specialdiets@pabulum-catering.co.uk.
What to do if you have concerns about the medical diet process?	<ul style="list-style-type: none"> ▪ Inform your Line Manager/Operations Manager without delay.
Can foods be labelled as allergen-free? For example, gluten-free, nut-free or milk free etc.	<ul style="list-style-type: none"> ▪ You must NOT label any food as free of an allergen.

10.0 Allergic Reaction Emergency Action

Allergic Reaction Emergency Action

If you think a customer is having a severe allergic reaction this is what to do:

- Do NOT move them.
- Ring 999 and ask for an ambulance with a paramedic straight away.
- Explain that your customer could have anaphylaxis (Pronounced ANA-FILL-AXIS)
- Contact the school's/site first aider as soon as possible
- Send someone outside to wait for the ambulance.
- If the customer has an adrenalin or Epi-pen, help them get it.

Remember: Death can take place within 10 minutes. Prompt and immediate action is vital.

Source: The Food Standards Agency, Safer Food, Better Business Catering pack. Available at <https://www.food.gov.uk/business-guidance/safer-food-better-business-for-caterers>.

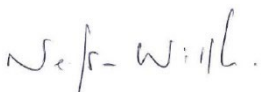
11.0 Allergic Reaction Emergency Action

Subject	Contacts
Medical Diets	specialdiets@pabulum-catering.co.uk
Food Safety	safety@pabulum-catering.co.uk

12.0 Policy Review

This policy will be reviewed in January 2025 or sooner if necessary.

Signed:



Nelson Williams
Managing Director