



Kemnal  
Technology  
College



# ALLERGEN MANAGEMENT POLICY

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**September 2023**

The Policy will next be reviewed by TKAT &  
Kemnal Technology College by:  
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## **AIM & PURPOSE**

This Policy covers food and drink provided on Academy premises by Academies and / or Catering Suppliers.

The aim of this Policy is to ensure that all Academies, Catering Suppliers (if applicable) and the Trust have a clear expectation of each parties' roles and responsibilities relating to the management of allergens for all food and drink provided to those on Academy premises (including hospitality) by either the Academy directly or a Catering Supplier.

the purpose of this policy is to protect the Pupils, Staff and Visitors consuming food provided by the Academy and / or a Catering Supplier on Academy premises from the potential harm of consuming ingredients that cause allergic reactions and illness and to ensure that the Trust complies with its relevant legal obligations.

This Policy must be read in conjunction with each Academy's Supporting Pupils with Medical Needs policy.



## **DEFINITIONS**

**Academy** – An Academy within The Kemnal Academies Trust (referred to in this policy as the “Trust”).

**Allergen Champion** – A lead person within the kitchen team (usually the Unit Manager) appointed by a Catering Supplier to handle requests for allergen information and / or to provide advice on Food Allergens. Some Catering Suppliers do not refer to this person as the Allergen Champion, but one definition is used in this Policy for consistency.

**Anaphylaxis or Anaphylactic shock** - Anaphylaxis is a severe life threatening generalised or systemic hypersensitivity reaction.

**Appointed Food Safety Management Support Company** – A third-party contracted to provide the Academy with food safety management support and services.

**Catering Staff** – Staff employed by the Catering Supplier.

**Catering Supplier** – A third-party providing catering services / a food provision on Academy premises (including through a contract and / or service level agreement).

**Certified Allergy** – An allergy that has been certified by a medical professional and where medical evidence regarding the Food Allergy has been provided to the Academy.

**Food Allergen** – the specified allergens required to be declared as allergens to persons to whom food and drink is being provided under relevant food information legislation. At the time of this policy, the specified allergens include celery, cereals containing gluten (such as barley and oats), crustaceans (such as prawns, crabs and lobsters), eggs, fish, lupin, milk, molluscs (such as mussels and oysters), mustard, peanuts, sesame, soybeans, sulphur dioxide and sulphites (if they are at a concentration of more than ten parts per million) and tree nuts (such as almonds, hazelnuts, walnuts, brazil nuts, cashews, pecans, pistachios and macadamia nuts).

**Food Allergy** - An adverse reaction to a Food Allergen within a food or drink that involves the immune system and can be a potentially life-threatening condition. Symptoms can appear within minutes, or up to several hours after a person has eaten a food or drank a drink they are allergic to. There is no cure for a food allergy. An allergic individual must avoid the food which makes them ill. Medical evidence of a Food Allergy must be provided to an Academy before a Pupil will be able to receive a Special Diet.

**Food Intolerance** – A difficulty digesting certain foods and having an unpleasant physical reaction to them. Food intolerances are treated by the Trust and Academies in the same way as Food Allergies and this Policy should be read accordingly.

**Parents and carers** – Someone aged over 18 who provides care to and has parental responsibility for a Pupil / Pupils who attend an Academy.

**Pescatarian** – An individual who does not eat meat but does eat fish.



**Preference Diet** – A Pescatarian, Vegan and / or Vegetarian diet or any special request from a Parent and carer to avoid and / or limit their child's consumption of an ingredient that is not a Food Allergen due to concerns that ingredient causes their child to be unwell (e.g., strawberries).

**Pupil** – A child who is enrolled at the Academy.

**Special Diet** – A menu provided by the Catering Supplier, or the Academy if the food provision is managed in-house, that caters for a Pupil's Food Allergy or Food Intolerance. A Special Diet will only be provided following a written request from a parent and carer for such a diet and on receipt of medical evidence confirming the Pupil's Food Allergy.

**Staff** – Individuals employed by the Trust

**Vegan** – An individual that only eats plants (such as vegetables, grains, nuts and fruits) and food made from plants.

**Vegetarian** – An individual that does not eat meat or fish. A vegetarian individual may or may not eat dairy products and eggs.

**Visiting Pupil** – A child who is not enrolled at the Academy but visits Academy premises to participate in an Academy organised educational, extra-curricular and / or shared learning activity

**Visitor** – Anyone who is not a Pupil, Staff and / or Catering Staff and is aged over 18.

## **INTRODUCTION**

An increasing number of children and adults suffer from Food Allergies. An allergic reaction to a food or drink could vary from mild rashes to severe life-threatening anaphylactic shock.

The law requires food businesses to identify to customers the Food Allergens in the food and drink they are providing.

## **GENERAL GUIDELINES**

Academies within the Trust as well as the Trust itself must at all times endeavour to act in accordance with the relevant and applicable food safety, allergen management and food information legislative obligations. The extent and nature of the applicable obligations will depend on the food provision at the Academy and as such must be considered on a case-by-case basis.

Catering Suppliers and food suppliers must be required to, and must, act in compliance and accordance with all relevant legislation including legislation relating to food safety, allergen management and food information.

Academies providing in-house catering must be guided by their Appointed Food Safety Management Support Company and/or the TKAT Catering Contract Manager. Academies providing in-house catering must have suitable and sufficient risk assessments, policies, procedures and documentation in place to ensure compliance with applicable



food safety, allergen management and food information legislative obligations. All such documentation should be reviewed in accordance with relevant legislation and where a significant change occurs (e.g., new legislation comes into force).

Where an Academy provides in-house catering, Academies must ensure that where required by law, foods and drinks have an appropriate label containing the requisite information and have processes in place to ensure that all information provided on food and drink labels is accurate and clear.

Where a Catering Supplier operates the food provision at an Academy, that Catering Supplier must ensure that where required by law, foods and drinks have an appropriate label containing the requisite information and have processes in place to ensure that all information provided on food and drink labels is accurate and clear.

### **MONITORING THE PERFORMANCE OF CATERING SUPPLIERS:**

- ❖ The Trust will monitor the performance of Catering Suppliers (including in relation to allergen management and the provision of food information) as is considered appropriate and in accordance with the contractual arrangements in place (e.g., through termly checks).
- ❖ In addition, Academies must also conduct appropriate and suitable monitoring checks to ensure Catering Supplier's performance and compliance and if the Academy has any concerns regarding the Catering Supplier's performance and / or compliance this should be raised with the TKAT Catering Contract Manager and the Catering Supplier without delay.

Where the food and drink provision within an Academy is provided by a Catering Supplier, that provision must be provided in accordance with the Catering Supplier's allergen management policies and procedures. The Academy must provide all required information in relation to Food Allergies, Food Intolerances and, in the case of Primary Academies, Preference Diets to the Catering Supplier by liaising with Parents and carers on behalf of the Catering Supplier. Such information regarding Pupils provided to the Academy by Parents and carers must be provided without delay at the beginning of each new school year and should be kept up to date.

All Staff must regularly undertake allergen awareness training that is suitable and appropriate to their role and be comfortable with providing allergen information accurately and to the extent required by their role. This includes wider members of Staff that may be involved with assisting Pupils with the selection of food, and Staff who are involved in the management and / or procurement of the provision of food and drink.

Where a Catering Supplier operates the food provision at an Academy, the Catering Supplier must ensure all Catering Staff have up-to-date allergen awareness training that is suitable and appropriate to their role.

Academies must retain evidence of their compliance with relevant legislation including legislation relating to food safety, allergen management and food information in accordance with the Trust's Data Protection and Data Retention policies. The Trust and the relevant Academy must also retain evidence of compliance with this Policy and any



monitoring conducted in relation to the Catering Supplier's performance / compliance, in accordance with the Trust's Data Protection and Data Retention policies.

Catering Suppliers must retain evidence of their compliance with relevant legislation including legislation relating to food safety, allergen management and food information in accordance with their data protection and document retention policies.

## **PRIMARY ACADEMIES**

Suppliers of prepacked food and drink to Primary Academies must list all ingredients present on the packaging. Any Food Allergens present must be emphasised in the ingredients list in line with relevant food information and allergen legislation.

Primary Academies must have in place a process for identifying Pupils with Food Allergies at the service counter. This could be a lanyard or identification pass that is submitted at the service counter and must be updated termly.

Primary Academies must hold on file all medical evidence that supports the Parent and carer's request for a Special Diet. Only Pupils that provide medical evidence supporting their Food Allergy will be presented to the Catering Supplier to receive a Special Diet.

Subject to receiving the necessary information from Parents and carers, Primary Academies must keep the Pupil's allergen information given to the Catering Supplier up to date with a minimum of annual checking and notification.

parents and carers must inform Academies if a Pupil requires a Preference Diet and if a Catering Supplier provides the food provision at the Academy, the Academy must inform the Catering Supplier accordingly.

Whilst the Trust owe a duty of care to Staff and Visitors, the Trust expect Staff and Visitors to inform and keep the Academy up to date regarding any relevant allergen information. Staff and Visitors are expected to be capable of maintaining their own medical needs and must ask to view the allergen information or speak to the Allergen Champion each time they visit the catering facility.

Academies must require those responsible for a Visiting Pupil (whether that be their school / academy, parents and carers or the visit organiser) to provide details of that Visiting Pupil's allergen information and / or requirements for a Preference Diet. If a Catering Supplier provides the food provision at the Academy, the Academy must inform the Catering Supplier accordingly. Where relevant details are provided, it will then be for the Academy and / or the Catering Supplier to ensure any food provision accounts for the Visiting Pupil's Food Allergen and / or Preference Diet.

## **SECONDARY ACADEMIES**

Suppliers of prepacked food and drink to Secondary Academies must list all ingredients present on the packaging. Any Food Allergens present must be emphasised in the ingredients list in line with relevant food information and allergen legislation.



Pupils who are capable of maintaining their own needs in relation to allergies and intolerances must ask to view the allergen information or speak to the Allergen Champion each time they visit the catering facility.

Pupils in Secondary Academies who have special educational needs and cannot and / or may not always ask for the allergen information must have their Food Allergy requirements set as alerts on the cash tills. Each Academy must ensure the various models of tills and software are set up in partnership with the Catering Supplier to operate such alerts.

Only Certified Allergies for Pupils with special educational needs must be set as alerts on the tills.

Alerts are not required to be set on the tills in relation to Preference Diets. In exceptional circumstances, alerts may be set for Pupils with special educational needs in respect Preference Diets following a discussion between Parents and carers, Staff and Catering Staff (if applicable).

The operation of the alerts:

- ❖ When alerts show at the point of purchase, the Catering Staff / Allergen Champion must make the affected Pupil aware that the product they are attempting to purchase contains an ingredient to which they have a Food Allergy, explain why they cannot serve the food and ask / help the Pupil to select an alternative. If a Pupil is flagged as having a Food Allergy, they must never be given any foods which do or may contain those allergenic ingredients.
- ❖ The Pupil must be told that until notification is given in writing by their Parent and carer, they will not be served those products. If the Catering Staff cannot resolve the issue with the Pupil and the Pupil continues to insist on making an unsuitable purchase, the Catering Staff must escalate this to the nearest member of Staff employed by the Trust.

Whilst the Trust owe a duty of care to Staff and Visitors, the Trust expect Staff and Visitors to inform and keep the Academy up to date regarding any relevant allergen information. Staff and Visitors are expected to be capable of maintaining their own medical needs and must ask to view the allergen information or speak to the Allergen Champion each time they visit the catering facility.

Where a Visiting Pupil has special educational needs and cannot and / or may not always ask for the allergen information, Academies must require those responsible for that Visiting Pupil (whether that be their school / academy, parents and carers or the visit organiser) to provide details of that Visiting Pupil's allergen information and / or requirements for a Preference Diet. If a Catering Supplier provides the food provision at the Academy, the Academy must inform the Catering Supplier accordingly. Where relevant details are provided, it will then be for the Academy and / or the Catering Supplier to ensure any food provision accounts for that Visiting Pupil's Food Allergen and / or Preference Diet.



## **FOOD AND DRINKS PROVIDED OTHERWISE THAN THROUGH THE DESIGNATED MEAL PROVISION**

There may be circumstances where food and drinks are provided to Pupils, Staff and Visitors outside of the designated meal provision at breaktime and lunchtimes. For example, food may be provided at parents' evening and / or through school clubs.

Where food and / or drink is provided free of charge by the Academy and / or a school lettings partner, information about the Food Allergens contained within the food and / or drink (or used a processing aid within it) must be provided as required by law.

Where food is provided through a buffet format, the allergen information must be provided for each food item separately, not the buffet as a whole.

At all events there must be an Allergen Champion or suitably competent lead person to advise on allergen content of the food provided.

## **ROLES AND RESPONSIBILITIES**

### **THE TRUST WILL:**

- ❖ ensure this Policy and any associated Trust procedures are reviewed on a regular basis and remain up to date.
- ❖ support Academies as appropriate to secure compliance with this Policy and the Trust's relevant legal obligations.
- ❖ monitor the compliance and performance of Catering Suppliers as is considered appropriate in the circumstances and as required by the contractual arrangements in place.

### **THE CATERING SUPPLIER (WHERE APPLICABLE):**

- ❖ Where an Academy provides in-house catering, any reference to the Catering Supplier within this section should be read as appropriate as referring to the Academy.
- ❖ The Catering Supplier must:
  - ensure compliance with their obligations under relevant legislation concerning food safety, allergen management and food information.
  - be aware of all individual Pupil's Food Allergies and Food Intolerances. In Primary Academies, Catering Suppliers must also be aware of Pupil's Preference Diets.
  - ensure receipt of allergen information for all food and drink purchased for provision or use at the Academy.
  - keep clear records regarding the Food Allergens contained within food prepared.
  - offer allergen information to Pupils, Staff and Visitors clearly and in accordance with the law.
  - where required by legislation, provide appropriate and legally compliant labelling for all food and drink offered.



- assist and support Academies with the identification of Pupils with allergies with a view to safeguarding the relevant Pupils.
- ensure that Catering Staff are suitably and regularly trained on allergen awareness.
- ensure that an Allergen Champion is appointed and that at all relevant times a suitably competent member of Catering Staff is available to provide allergen advice and guidance on food and drink being served.

### **THE ACADEMIES MUST:**

- ❖ collect information regarding Pupil's Food Allergies, Food Intolerances and in the case of Primary Academies, Preference Diets.
- ❖ where catering services are provided by a Catering Supplier, provide the information on Food Allergies, Food Intolerances and in the case of Primary Academies, Preference Diets to the Catering Supplier.
- ❖ require parents, carers and / or Pupils to provide wherever necessary updated information regarding Food Allergies, Food Intolerances and in the case of Primary Academies, Preference Diets.
- ❖ Subject to receiving the information described at paragraph 8.2.1(c), ensure the information relating to Food Allergies, Food Intolerances and in the case of Primary Academies, Preference Diets, remains up-to-date and that any Catering Suppliers are provided with updated information.
- ❖ ensure Pupils and Parents and carers feel empowered and are able to provide information regarding Food Allergies, Food Intolerances and Preference Diets and to make requests for allergen information.
- ❖ ensure suitable and sufficient measures are in place to identify Pupils with Food Allergies and to mitigate the risks of an allergic reaction occurring so far as is reasonably practicable.

### **PUPILS**

Pupils must so far as possible, with allowance for their age and any special educational needs:

- ❖ be familiar with what their Food Allergies, Food Intolerances and Preference Diets are and the symptoms they may have that would indicate a reaction is happening.
- ❖ seek reassurance whenever they have concerns that a food and / or a drink may contain an ingredient to which they are allergic and / or have an intolerance.
- ❖ must not share food and drink with each other.

Pupils attending Secondary Academies must, so far as possible, with allowance for their age and any special educational needs be fully involved in, contribute to and co-operate with discussions about their Food Allergies, Food Intolerances and Preference Diets.

### **PARENTS AND CARERS**

Parents and carers must:



- ❖ provide the Academy with sufficient and up to date information about their child's Food Allergies, Food Intolerances and if appropriate, Preference Diet.
- ❖ keep the Academy up to date with any changes in their child's Food Allergy, Food Intolerance and / or Preference Diet and the management of that Food Allergy, Food Intolerance and / or Preference Diet.
- ❖ carry out any action they have agreed to take to secure the safety of their child. For example, provide medicines and equipment and ensure that they, or another nominated adult, are always contactable.
- ❖ ensure that any required medication to be kept on site at the Academy is supplied, in date and replaced as necessary.

## **DATA PROTECTION**

The collection, retention, processing and sharing of information for the purpose of allergen management is necessary to secure compliance with the Trust's food safety and health and safety obligations, including, but not limited to, those under the Health and Safety at Work Act 1974 and Food Information Regulations 2014, and to fulfil the Trust's duties to safeguard the health and wellbeing of Pupils, Staff and Visitors.

The collection, retention, processing and sharing of information for the purpose of allergen management will be carried out in accordance with relevant data protection legislation and the Trust's Data Protection Policy, Privacy Notice and any other related data protection documentation.

Relevant suppliers including Catering Suppliers and Appointed Food Safety Management Support Companies are required to comply with relevant data protection legislation through their data processing contractual arrangements with the Trust.

## **RELATED POLICIES AND PROCEDURES**

This Policy should be read in conjunction with and with reference to the Trust's other relevant policies and procedures, including (but not limited to):

- ❖ [Supporting Pupils with Medical Needs Policy](#)
- ❖ [Data Protection Policy](#)
- ❖ [Data Retention Policy](#)

The related policies and procedures listed above can be provided on request.