

A young girl with dark hair in a bun, wearing a white polo shirt, smiles while holding a plate of food. In the background, two school cafeteria workers in white uniforms and blue aprons are visible. The scene is set in a brightly lit school cafeteria.

Managing Food Allergens Safely In Schools

sodexo★

Introduction

Every school day, hundreds of young people trust us with something deeply important - their safety at mealtimes. At Sodexo, we treat that responsibility with absolute seriousness. Allergies and intolerances aren't preferences; they're potential medical emergencies, and our systems are built to reflect that.

Our teams receive ongoing training in allergen awareness, safe food handling, and emergency response. From the moment ingredients arrive on site, through storage, preparation, cooking, and service, we apply HACCP-based controls designed to minimise cross-contact and protect vulnerable pupils.

Sodexo supports the approach advocated by many allergy charities towards nut bans/nut free schools. They would not necessarily support a blanket ban on any particular allergen in any establishment, including in schools. This is because nuts are only one of many allergens that could affect pupils, and no school could guarantee a truly allergen free environment for a child living with food allergy. They advocate instead for schools to adopt a culture of allergy awareness and education. A 'whole school awareness of allergies' is a much better approach, as it ensures teachers, pupils and all other staff are aware of what allergies are, the importance of avoiding the pupils' allergens, the signs & symptoms, how to deal with allergic reactions and to ensure policies and procedures are in place to minimise risk.

Ultimately, our approach ensures that every child, regardless of dietary need, can enjoy a safe, inclusive dining experience supported by evidence-based practice, strong governance, and a culture where every colleague understands the critical importance of allergen management.



Process overview

1. Understand everyone's responsibilities
2. Get started
3. Get trained
4. Get prepared
5. Serves safely
6. Check food allergen safety



1. Responsibilities

1.1 Pupils

- To be educated in a safe and healthy environment.
- Not to be stigmatised.
- To be able to take part in all activities to the same extent as their peers.

1.2 Parent / carer

- To inform school of their child's special dietary needs along with a copy of a medical assessment from their doctor where available.

1.3 School

- To comply with the statutory guidance in the schools safety bill commonly known as Benedict's Law.
- To set and implement the school allergen policy.
- To obtain information on pupils with special dietary needs at the registration of new pupils, including any medical assessment from their doctor/dietician, where available.
- To ensure pupils with special dietary needs related medical conditions are readily identifiable to all school and catering staff.
- To ensure pupils with special dietary needs are managed on school trips/holidays.

1.4 Sodexo

- Follow Food Information for Consumers (FIC) Regulations 2014/ Food Information to Consumers, Regulation, General Food Law, Regulation
- To comply with the duty of care under common law not to serve food which contains relevant allergens to an individual who has a known allergy
- To work with the client to identify any pupils with special dietary needs and communicate this to the entire catering team.

2. Get started

2.1 Client allergen policy

- Obtain a copy, read and understand your client's allergen policy and agree a process of identifying pupils with a special dietary requirement.

2.2 Contacts in case of emergency

- Obtain the name and contact details of any nominated food allergy coordinator on site in case of emergency.
- Complete and display the Allergen Contact Details on the staff notice board or production area.

3. Get trained

3.1 Understanding food allergens, intolerances and coeliac disease

- The law requires us to serve safe food and to be honest about the food we sell or serve – it must be what it says it is. This applies to ANY food, not just those listed as the 14 major allergens in the Food Information for Consumers (FIC) Regulations 2014.

Pupils can be allergic to ANY food and you must not serve them food containing something they have told you they are allergic to.

- The FIC Regulations requires Sodexo employees to provide accurate allergen information on which dishes contain any of the 14 major allergens to pupils if they ask for it and display full ingredient and allergen information on foods which are pre-packed for direct sale.
- **Food allergens** are specific food ingredients which, when consumed either alone or as part of a recipe, cause certain people to have an adverse allergic reaction.
- **A food allergy** is an adverse reaction to a food that involves the immune system and can be potentially life threatening. An allergic individual must avoid the food which makes them ill.
- **A food intolerance** is different from a food allergy in terms of severity of symptoms and onset may be longer.
- A gluten free diet is required by people who have **coeliac disease**, dermatitis herpetiformis (a skin condition related to coeliac disease) or gluten intolerance. Note: coeliac disease is not an allergy or intolerance, it is a medical condition that can only be treated with a diet free from gluten. Further information on coeliac disease can be found in Appendix B.
- For the purposes of this document a special diet includes **food allergies, intolerances and other dietary related medical conditions.**

3.2 Training

Everyone involved in food service must understand their role and responsibility for allergen management. To achieve this:

- Anyone accountable or responsible for either; creating, selling, managing or operating food services, including allergen champions must complete the Full Schools Allergen Curriculum. This must be completed **within 3 months of commencing employment and refreshed annually.** Site Managers to deliver resources within the above curriculum to front line employees within food services.
- Front line employees, casual and agency workers involved in food services who have not completed the Full Schools Allergen Curriculum must complete FS09 Food Allergy Management Great card. This must be completed **every term** and when a new employee starts. Training must be recorded on the learner record card. These employees must also complete Great! FS16 PPDS Compliance training annually.
- Staff competency must be regularly reviewed.

4. Get prepared

4.1 Special diets school pack

- Find out which pupils require special dietary requirements in the school, by sending out the Special Diet Schools Pack provided by the schools segment, either at the start of a new mobilisation or annually for existing contracts, which consists of:
 - i. A copy of Sodexo's process for managing food allergens safely in schools
 - ii. Managing Special Diets letter to parents template
 - iii. Special Diet Information Form
 - iv. General Data Protection Regulation (GDPR) Guidance note
 - v. Frequently Asked Questions

Await response from the client:

- i. No response - assume that pupil has no special dietary need.
Full menu to be offered to the pupil
- ii. Verbal communication or hand written note that pupil has allergen(s) intolerance(s).
- iii. Special Diet information form or equivalent returned with or without medical diagnosis.

4.2 Special diet folder & summary sheet

- Create a specific Special Diets folder to collate all the completed Special Diet Information Form(s) and Special Diet Summary Sheet. This file must always be kept up to date and made available for reference purposes. This includes destruction of personal information we no longer need, for example when a pupil leaves or confirmation that they no longer have an allergy. This information must be destroyed securely and immediately. All catering staff must be aware of the location of the file.

4.3 Complex special dietary requirements

- Where a pupil has complex special dietary needs i.e. multiple food allergies and/or if you unsure of how to cater for their needs, Please contact the Sodexo dietician for assistance

4.4 Formal process of identifying pupils with special dietary requirements

- Agree with the client and confirm in writing, an appropriate method of identifying pupils with special diets for every catering and retail service including snacks/non-core feeding. A copy of this should be kept in your Special Diets folder for auditing purposes. You may wish to implement one or more of the following examples:
 - i. Client staff accompany the pupil
 - ii. Photograph to be displayed in the Special Diets folder or on the servery/kitchen wall which is only visible to the catering staff (with parent's permission)
 - iii. The pupils that require a special diet may be introduced to the entire catering team to assist with recognition.
 - iv. Cover and label the meal with the pupil's name
 - v. Lanyard
 - vi. Wrist band
 - vii. Badge
 - viii. Till (can be used in conjunction with any other methods but not in isolation)

This list is not exhaustive; alternatives may be sought.

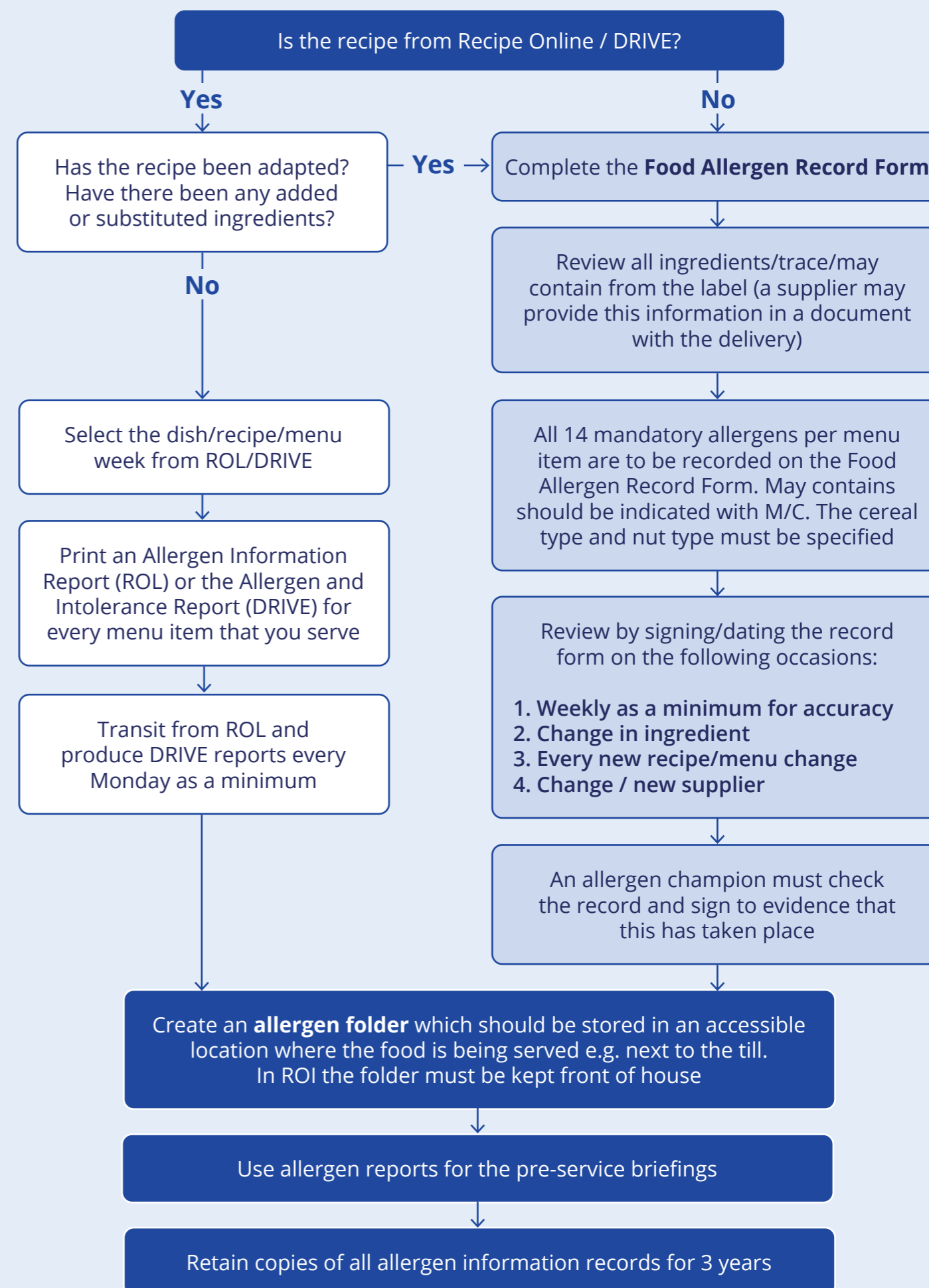
4.5 Display the allergen notice

It is vital that we know whether our pupils have allergens or intolerances. We must encourage pupils to ask about the allergen content of the meal or make Sodexo aware of any allergens or intolerances, by displaying the allergen notice in the following locations:

- At all self-service counters
- At employee served counters
- By the till (if that is where people order)
- On the menu or bar (where applicable)

The notice needs to be clearly written in a minimum of Arial, 18 font and located in an obvious spot where the pupil is likely to see it before placing their order.

How to compile and keep an up to date allergen folder





4.6 Display the employee allergen poster

Obtain a copy of the employee allergen poster and display back of house.

4.7 Display the How to Respond to a Customer Enquiry about Allergens tent card

This tent card should be displayed at the till/ service area to assist staff in dealing with customer enquiries.

4.8 Allergen records and folder

Food businesses are required by law to be able to provide consumers with accurate information on the 14 major food allergens. Allergen records of all decanted and prepared foods must be available for the 14 food allergens.

Note: Bought in prepacked foods sold with allergen labelling do not need to be documented in the allergen folder.

There are two ways of compiling allergen records, these should be stored in an allergen folder:

1. Electronically by producing an Allergen and Intolerance Report (DRIVE)
2. Manual records using the Food Allergen Record Form



4.9 Labelling

Back of house

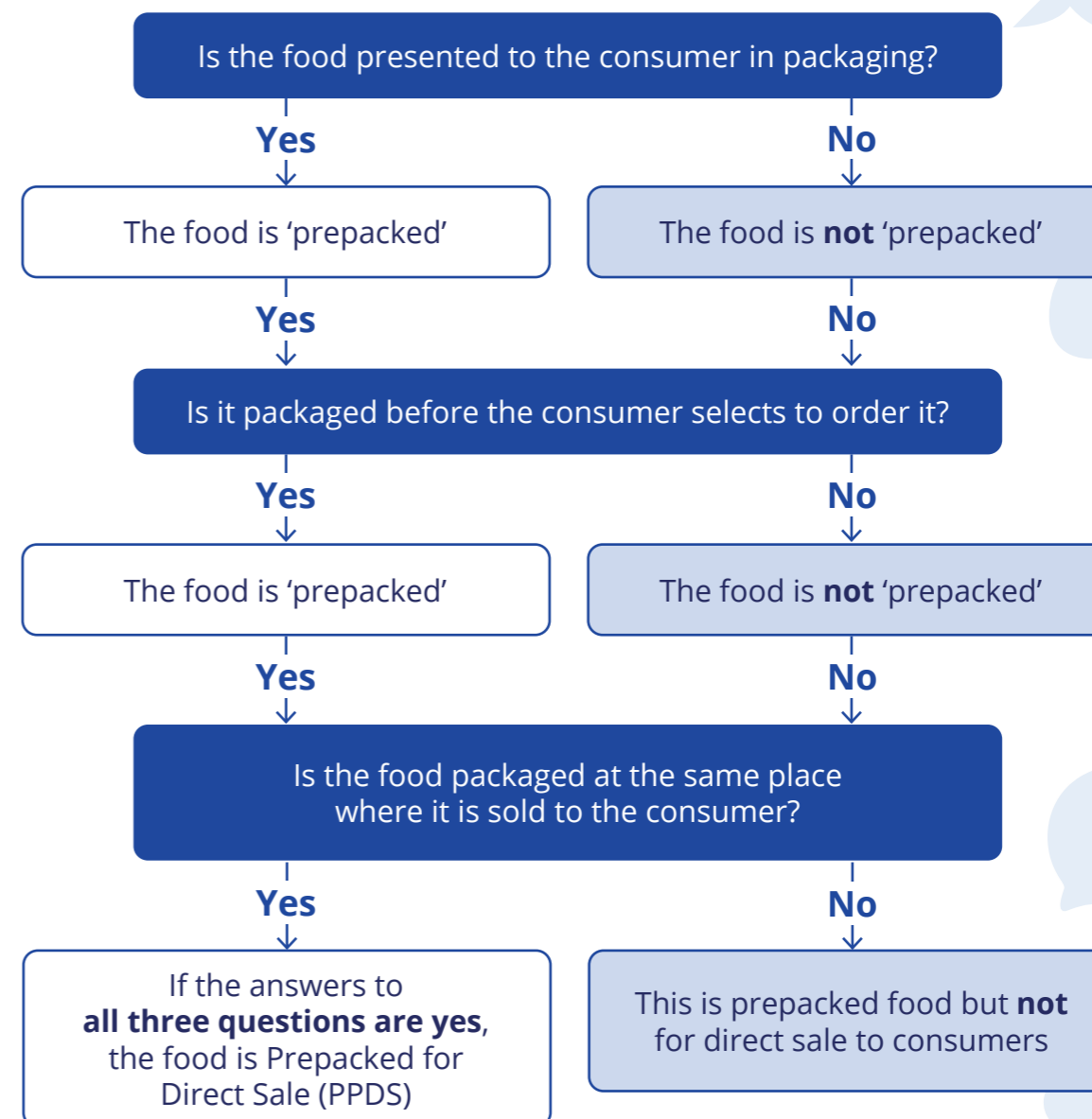
- Use the purple allergen label to identify the 14 major allergens for decanted and prepared items to ensure legal compliance. This label should also be used and completed in full for opened products with after opening shelf life instructions. No other label is permitted. Products which do not contain any of the 14 allergens should be labelled with the purple allergen label and the allergen section labelled with N/A to identify they have been checked. Where products are listed as “may contain/ produced in a factory that handles etc.” the allergen should be identified on the label as “m/c”.

Front of house

- Do not** display details of allergens directly on the menu, blackboards or shelf labels as it would be difficult to post all ingredients and keep up to date.
- It is **prohibited** for any products produced in the unit to be labelled “free from” e.g. “nut free” or “gluten free” or “very low gluten”, unless a **laboratory test has been performed on the product**.
- Where a product is produced for a pupil with a **special dietary requirement**, this individual meal should be covered and labelled with the:
 - food name
 - pupil’s name
 - dietary requirement
- Prepacked for direct sale food (PPDS) is food which is offered or sold to consumers and is in this packaging before it is ordered or selected. It can include food that consumers select themselves (e.g. from a display unit), as well as products kept behind a counter and some food sold at mobile or temporary outlets. Foods which are prepacked for direct sale must be labelled with the **name of the food** and the full ingredients list with the **14 major allergens required to be declared by law emphasised within it**.

Adherence to the Sodexo process for PPDS food labelling is mandatory. Refer to the PPDS chart to determine which items are classed as PPDS.

When is a product PPDS?



4.10 Pre-service briefings

- All food handlers must attend a pre-service briefing.
- The pre-service briefing must be undertaken by the Catering Manager/ Head Chef or Allergen Champion.
- The briefing must include details of any known consumers requiring a special diet menu including how the consumer will be identified; their suitable or pre-agreed meal choices; how they are to be served and who is responsible for serving this consumer.
- The briefing must detail the Allergen Champion and location of allergen records for each service area.
- Food handlers must be briefed on how dishes are to be served to ensure correct portion size and minimise any allergen/ cross contamination risk.
- The briefing must include details of any product/ recipe or allergen changes e.g. due to menu change, substitute ingredients etc.
- The briefing must give opportunities for staff to review allergen records and seek further guidance or clarification ahead of service.

4.11 Allergen champions

- Each unit, satellite hub or area where food is sold must nominate sufficient employees to be Allergen Champions to ensure that there is at least one on site at all times for each service area. An Allergen Champion is a food handler who has completed the requisite training and assessed as being competent.

Allergen Champions will:

- Complete the E-Learning Schools Fall Allergen Curriculum.
- Ensure allergen information is accurate and available to the team
- Be the main point of contact for consumer's allergen enquiries in case of severe or complex food allergen needs
- Ensure a pre-service briefing is performed
- Check special diet meals before they are served. (The catering manager/supervisor or Allergen Champion is responsible for double checking the special diet meals before they are served. This check is to ensure suitability of the special diet meal and must be completed by two different people.)

4.12 HACCP controls for back of house

The following control measures need to be implemented for each section of the HACCP steps, where they are relevant to your food operation:

Purchase / delivery

- Use authorised suppliers only
- Check new products. Record any substituted brands on the delivery record and check the allergen folder is up to date for the menu items. Authorised food suppliers are not permitted to supply Sodexo with substituted products that add an additional one of the 14 major allergens into the food and for PPDS product lines should contain like for like ingredients. If any discrepancies are found you must inform Supply Solutions and if you accept the product, the Food Allergen Record Form for the menu item(s) affected must be updated/completed.
- Reject products that are damaged or where allergen information is missing.
- Inform Supply Solutions, where a food item has been mislabelled, has no label or there is a discrepancy between the electronic allergen information and the label.

Storage

- Store opened dry ingredients in sealed containers with a completed purple allergen label.
- Securely wrap defrosting and prepared food products and label with a completed purple allergen label.
- If ingredients for a product have changed, store the new branded ingredient separately or, if stored together in one container, update the Food Allergen Record Form for both products.
- Products that are allergenic and likely to spill easily should be stored on the lower shelves where possible (e.g. flour). Any spills should be cleaned up immediately.

Pre-service briefings

- Review the main menu and all special diet menus for the day and provide the affected pupil with an amended menu based on the information that you have been provided.
- Keep equipment in good condition.
- Before preparing a special diet meal always clean and sanitise the area and utensils, first, even if it appears clean and wash your hands.
- Where practicable prepare special diet meals first and if space allows, dedicate a kitchen area, to preparing a special diet meal (this should not be in an area dedicated to raw food preparation).
- Where meals are produced using Recipe Online / DRIVE it is important to follow the recipe and ensure that ingredients are not added or substituted.
- Doing so may change the allergens that are present in the meal. If a recipe cannot be followed, then complete a Food Allergen Record Form and inform all employees of the change. Where a recipe for a PPDS product cannot be followed this product must not be made.
- Spills should be cleaned up immediately following the cleaning and sanitising process. If the spillage has contaminated a special diet meal, this must be disposed of.

Cooking / reheating

- Take care when using certain cooking and drizzling oils as they can pose an allergen hazard. Allergens from these oils must be included in the Food Allergen Record Form or within the electronic allergen information.
- Do not use unrefined ground nut oil (peanut oil) for cooking purposes.
- Use clean and sanitised equipment for cooking and sanitise in between different cooking tasks. Please refer to the Cleaning Plates, Cutlery and Equipment Process
- Ensure that any dish being prepared for an allergic/special diet pupil is protected from the allergen in question.

Toasting

- For gluten free bread, use a designated toaster or toaster bags, separate (or cleaned and sanitised) tongs, chopping boards, knife and butter (unless wrapped single butter) to prevent cross contamination.

Fryers

- Where space and equipment allow, dedicate and label fryers for specific menu items e.g. gluten free ingredients. This should be trained out to employees.
- Where this is not possible, advise the pupil which food items have previously been cooked in the oil and what allergenic ingredients it may contain i.e. gluten, fish, egg. A Food Allergen Record Form must be completed and may contain 'mc' indicated on the form. If the pupil is allergic to any allergens that may be in the oil due to previous usage advise the pupil of an alternative suitable special diet meal.

Cooling

- Special diet meals to be cooled separately so they cannot be contaminated. Keep items covered and labelled with a purple allergen label including the pupil's name.



5. Serve safely

5.1 HACCP controls for front of house / service offer

The following control measures need to be implemented for each section of the HACCP steps, where they are relevant to your food operation.

Food ordered remotely (online or via phone)

If food is sold online or by phone through distance selling, allergen information must be provided at two stages in the order process.

Distance selling does not apply where the consumer is present at the site where the food is being prepared or offered for sale at the time of making the order. E.g. drive through and hotel room service. For more information please see the **Distance Selling/Remote Food Order Process**.

You must provide allergen information:

1. Before the purchase of the food is completed - this can be in writing (by putting on a website, catalogue) or by signposting the customer to phone the Sodexo site to obtain further information.
2. When the food is delivered - this can be in writing (via an Allergen Record Form) or orally (by phone by signposting where to obtain further information).

It is best practice that allergen information should be available to a customer, if requested in a written form.

Special diet meals should be labelled clearly so customers know which dishes are suitable for those with an allergy.

Service

- Display the allergen notice or ensure exact wording is located on the menu.
- The How to Respond to a Customer Enquiry about Allergens tent card should be displayed at the till/ service area to assist staff in dealing with customer enquiries.
- Allergen folder must be up to date and available for pupil enquiries.
- Assign a member of your team who will be responsible for following all special diet menus carefully and preparing the meals for these pupils.
- Where the meal choices for a pupil requiring a special diet menu has been pre-ordered, a special diet meal should be prepared. Special diet meals need to be covered, labelled and stored separately. All components of the meal e.g starter, main course and dessert must be included.
- The catering manager/supervisor or allergy champion is responsible for double checking the special diet meals before they are served. This must be completed by 2 different people.
- Ensure all catering staff are aware of which pupils have special dietary needs.
- Make time to talk to the school staff and/or mid-day supervisors about the pupils with special dietary needs.
- As the children come for lunch, identify the pupils by the means agreed with your client.
- Wash hands regularly and before serving a meal to an allergic guest.
- Use dedicated utensils for each different dish that are clean and sanitised before use.
- Make sure that foods are not dropped or transferred from one dish to another.
- Any leftover food in open self-service displays must not be reused.
- 'Gluten free' cakes will need to be kept in their original packaging to protect them from allergen cross contamination.

Snacks / non-core feeding

- There should be an appropriate method of identifying pupils with special dietary needs for snacks and non-core feeding. The allergen notice must be displayed and allergen information must be available for pupil enquiries regarding allergens.

Sodexo provided packed lunches

- It is the client's responsibility to check the requirements of all pupils that need packed lunches and inform Sodexo of any pupils with special dietary needs. Where special dietary information is provided for a pupil, Sodexo must cater for the individual based on the information and label the packed lunch with the pupil's name, food name and dietary requirement.

Commercial summer lets / hospitality events

- For children, Year 13 and below and those with special educational needs (regardless of age), it is the client's responsibility to check the requirements of all children that require meals and inform Sodexo of any children with special dietary needs. Where information is provided, an amended menu based on the information that Sodexo has been supplied with, must be catered for.

NB: Managers may identify risks related to their service or particular pupil requirements that are not covered in the controls listed above, therefore further control measures must be documented, implemented and trained to employees as necessary.

5.2 Understanding pupil enquiries

- In the event of a pupil asking for information on the allergen content of the meal/product, employees should refer to the allergen folder.
- If they are unsure or unable to answer the query, this should be referred to the Allergen Champion or manager, supervisor or head chef.

5.3 Pupils with allergies to ingredients not on the list of 14 major allergens

- If a pupil advises that they suffer an allergy to an ingredient not on the list of 14 major allergens, you should:
 - Endeavour to provide a meal that does not contain that ingredient.
 - Check the labelling of each of the ingredients used in the dish(es) and provide information to the pupil. The suitability of any such meal choice cannot be assessed via allergen records as these only relate to the 14 major allergens and there is no obligation to complete an additional Food Allergen Record Form for listing that ingredient.
 - Make the pupil aware you cannot provide information whether any ingredient supplied to them may contain traces of their particular allergen, as there is no legal requirement for suppliers to provide information other than relating to the 14 legally listed allergens.
- If there are no meals prepared that are suitable, it may be necessary for a specific meal to be prepared to accommodate the special dietary need. These must be clearly labelled with the name of the food, consumer's name and dietary requirement, when they are to be held before service.

5.4 What to do with verbal or handwritten confirmation of a pupil's special dietary requirements

- Take the pupil's name
- Complete the Special Diet Summary Sheet
- Provide that pupil with an amended menu based on the information that has been provided.
- The Special Diet Notification Form must be completed and sent to the client to notify that the pupil has informed us that they have a food allergy/intolerance etc. and that Sodexo has put the pupil on the amended menu as described in the point above.
- Make your team aware of the pupil who is on an amended menu and advise and assist the pupil and the school accordingly.

5.5 What to do if something goes wrong

If you suspect a pupil is having an anaphylaxis reaction or any type of severe food allergy, this is a medical emergency. Make sure you:

- Call 999 immediately and follow advice given.
- Contact a first aider.
- Do not move the person.
- If they have not notified you of an allergy, ask them and their companions if they have an allergy, what it is and its severity.
- Share this information with the 999 operator.
- Ask the pupil or their companions, if they carry an adrenaline pen and assist to retrieve it.
- Should you have a trained first aider who can assist in the administration of the adrenaline pen, this person should offer to assist.
- Send someone outside to wait for the ambulance and stay with the pupil until help arrives.
- Inform the school so that the pupil's parent/carer can be notified.

Reporting food allergy incidents

- **An Allergen Incident** is a known component of food which causes a physiological reaction.
- **A Near Miss** is an unsafe or unsatisfactory food/ drink condition and/ or act that did not result in harm but had the potential to do so.

All allergen incidents and near misses must be reported immediately using the HSEQ Incident Reporting Form Form. Any corrective actions identified must be shared and escalated to all relevant parties by the catering manager.



6. Check food allergen safety

6.1 Food Safety and Allergen Checklist

The Tier 1 3 Monthly Food Safety and Allergen Checklist should be completed by the manager/supervisor every 3 months. This provides a tool to check that allergen management is controlled.

6.2 Checklist

The Tier 1 Special Diet Checklist for Schools MUST be completed annually.



Appendix A

What are the 14 allergens?

Here are the 14 major allergens which need to be declared by law when used as ingredients.



Celery

- This includes celery stalks, leaves and seeds, and celeriac
- It is often found in celery salt, salads, ketchup, some meat products and stock cubes



Cereals containing gluten

- This includes Wheat (such as spelt and Khorasan/Kamut), Rye, Oats, Barley
- It is often found in foods containing flour, such as baking powders, batter, breadcrumbs, bread, cakes, couscous, meat products, pasta, pastry, sauces, soya sauce, soups and foods dusted with flour



Crustaceans

- This includes crab, lobster, prawns, shrimp, crayfish and scampi
- Shrimp paste is often used in Thai and south-east Asian curries or salads



Eggs

- Eggs are often found in cakes, some meat products, mayonnaise, mousse, pasta, quiche, sauces and pastries or foods brushed or glazed with egg



Fish

- Fish (all species), fish extracts, fish sauce, fish oils, fish paste
- It is often found in pizzas, relishes, salad dressings, stock cubes and Worcestershire sauce



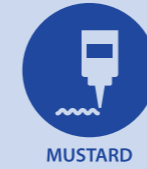
Milk

- Includes butter, cheese, cream, milk powder in butter, cheese, cream, milk powders and yoghurt
- It is often used in foods glazed with milk, powdered soups and sauces



Molluscs

- This includes oysters, clams, mussels, cockles, land snails, squid, scallops and whelks
- It is often found in oyster sauce or as an ingredient in fish stews



Mustard

- This includes liquid mustard, mustard powder and mustard seeds
- It is often found in breads, curries, marinades, meat products, salad dressing, sauces and soups



Lupin

- This includes lupin seeds and flour
- Can be found in some types of bread, pasties and pasta



Nuts

- This includes almonds, hazelnuts, walnuts, cashews, pecan nuts, Brazil nuts, pistachio nuts, macadamia or Queensland nuts
- These can be found in breads, biscuits, crackers, desserts, ice cream, marzipan (almond paste), nut oils and sauces. Ground crushed or flaked almonds are often used in Asian dishes such as curries or stir fries
- Be alert to the variety of nuts as some people are allergic to some but not all



Peanuts

- Includes all peanuts, groundnuts, peanut protein, arachis oil, peanut oil, peanut flour, groundnut oil
- This can be found in biscuits, cakes, curries, desserts and sauces such as satay



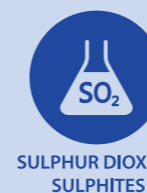
Sesame seeds

- This can be found in bread, breadsticks, hummus, sesame oil and tahini (sesame paste)



Soya beans

- Includes all soybean, soy oil and soymilk products
- This can be found in bean curd, edamame beans, miso paste, textured soya protein, soya flour or tofu
- It is often used in some desserts, ice cream, meat products, sauces and vegetarian products



Sulphur dioxide & sulphites

- This is often used as a preservative in dried mixed fruit, meat products, soft drinks and vegetables as well as in wine and beer

Appendix B

Coeliac disease

Coeliac disease is a digestive disorder that damages the small intestine. The disease is triggered by eating foods containing gluten.

Gluten is a protein found naturally in wheat, barley, and rye, and is common in foods such as bread, pasta, cookies, and cakes.

What is a gluten free diet?

Gluten can be present in food as an ingredient or food can be accidentally contaminated by coming into contact with gluten-containing ingredients, such as wheat flour or breadcrumbs. Some people with coeliac disease also react to a protein in oats which is similar to gluten. The diet must be followed strictly and for life.



Date of issue: March 2026

Process Author: School's segment

SAU-6448

