CORPUS CHRISTI COLLEGE

FOOD ALLERGEN MANAGEMENT POLICY

Version 2.0
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Date approved by Executive Body 23rd June 2022

Revision history

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<td>Domus Bursar</td>
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<td>Review for compliance with Natasha’s Law</td>
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<td>Split policy from procedure and clarified wording in responsibilities</td>
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Food Allergen Management Policy

1. Policy
Corpus Christi College is committed to reducing the risk to staff, students and visitors with regard to the consumption of allergens in food which could lead to an allergic reaction.

2. Statement
Corpus Christi College cannot guarantee a completely allergen free environment, but has procedures to minimise the risk of exposure, encourage self-responsibility, and plan for an effective response to possible emergencies.

3. Objectives of this policy
- To promote awareness of the nature of food allergens and bring these to the attention of College members and staff.
- To provide clear guidance to all catering staff (kitchen and pantry) on their responsibilities for the provision of food to members of the College community and visitors with a confirmed food allergy.
- To ensure that appropriate education/training is available and undertaken for all catering staff involved in providing food to customers with food allergies.

4. Background

4.1 What is a food allergy?
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: itching or strange metallic taste in the mouth; swelling of the throat and tongue; difficulty in swallowing or speaking; abdominal cramps, nausea and vomiting; skin hives (nettlerash) anywhere on the body; and in most extreme cases difficulties in breathing and a severe fall in blood pressure (anaphylactic shock). In extreme cases this can prove fatal.

4.2 What is food intolerance?
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 and may include headaches, fatigue and digestive problems. Food intolerance is harder to diagnose than a food allergy. The person with a known allergen trigger may know what food ingredient will provoke a reaction. However, they may well have eaten this food or a specific dish previously and had no adverse reaction.

4.3 Who is at risk?
Anybody can develop a food allergen or intolerance at any time in their life irrespective of whether they have consumed the food previously. A person with an allergy is at risk even if they consume a small amount of the food allergen. The proportion of the UK population with a true food allergy is approximately 1-2% of adults and 5-8% of children which equates to around 2 million in the UK. In addition, about 1:100 of the UK population has coeliac disease and needs to avoid gluten. Food Allergy and Intolerance Programme, FSA, March 2017.
4.4 Allergy Labelling Legislation
From 13 December 2014, legislation (the EU Food Information for Consumers Regulation 1169/2011) requires food businesses to provide allergy information on food sold unpackaged. This regulation also made changes to existing legislation on labelling allergenic ingredients in prepacked foods.
More information about the new European legislation can be found on the European Commission website:
https://ec.europa.eu/food/safety/labelling_nutrition/labelling_legislation_en
The legislation only covers information about major allergens intentionally used as ingredients. It does not cover allergens present following accidental contact.

From 1 October 2021, the requirements for allergen labelling information on Pre-packed for Direct Sale (PPDS) food will change – Natasha’s Law. PPDS food is food which is packaged at the same place it is offered to customers and is in the packaging before it is ordered or selected. Under the rules from 1 October 2021, food businesses must clearly display two essential pieces of information on all PPDS food. This includes 1) the name of the food and 2) a full ingredients list, with allergenic ingredients emphasised (for example in bold, italics or a different colour). This can include salads and sandwiches that customers select themselves and pre-wrapped foods kept behind a counter, as well as some products packaged and sold at mobile or temporary outlets.

4.5 The 14 Major allergens are:
- Eggs,
- Milk,
- Fish,
- Crustaceans (for example crab, lobster, crayfish, shrimp, prawn),
- Molluscs (for example mussels, oysters, squid),
- Peanuts, Tree Nuts (almonds, hazelnuts, walnuts, cashews, pecans, brazils, pistachios, macadamia nuts or Queensland nuts),
- Sesame Seeds,
- cereals containing Gluten (wheat (such as spelt, Khorasan wheat/Kamut), rye, barley, oats, or their hybridised strains),
- Soya,
- Celery and celeriac,
- Mustard,
- Lupin,
- Sulphur Dioxide and Sulphites (at concentration of more than ten parts per million).

People may report allergies to other foods not on the above list. Most common in the UK are kiwi, peas, other legumes (beans etc), other seeds and other fruits and vegetables. These requests must be treated as allergens in the same way as specified major allergens.

5. Procedures and Training

5.1 Responsibilities
- The Head Chef, or in his absence the Sous Chef, or senior kitchen team member is responsible for ensuring that any food provided for college members, staff or visitors with a food allergy is appropriate for their needs as requested.
- The Head Chef or most senior team member will ensure that allergen information is provided on all food/listed in the list of ‘Common Food Allergens’ above and additionally provide information where alcohol has been used within food supplied. This information should be presented in variety of manners as stated in the Allergen Procedure Guide.
- It is the responsibility of the Head Chef and kitchen team to ensure dishes are prepared in a consistent manner to avoid irregularities and where applicable in line with pre-specified allergens.
- It is the responsibility of the Head Chef and kitchen team to ensure clear and effective communication takes place where ingredient substitutions are made during a service and to ensure all display information is updated with any amendments.
- It is the responsibility of the College Butler to ensure an allergen ambassador will be identified from the Pantry team for every food service shift. It is the responsibility of the allergen ambassador and Pantry team to sufficiently understand the dishes they are serving as well as present supplied allergen information to the guest as required.
- College members, staff and their guests are required to clearly and accurately communicate food allergies and intolerances either by talking to the Allergen
Ambassador, using the meal booking system or (for a special event) notifying the Conference Office.

5.2 **Supplier product information**

- Any new products supplied are checked for allergen information and subsequently checked at regular intervals to ensure any change to allergen information is identified.
- Wherever possible, the same brand/product and supplier should be utilised to minimise variations to daily practises.
- Suppliers are routinely audited by an external body and allergen controls form part of these audits.

5.3 **Good kitchen and service practices**

All catering practices involving allergens within the College should be clearly stated in the Allergen Procedure Guide and reviewed frequently by the Catering Manager, Head Chef, College Butler and Domus Bursar.

5.4 **Managing cross contamination**

- High food hygiene standards are maintained throughout food handling areas.
- Where allergenic ingredients are packaged openly/loosely, they are stored separately in sealed containers with their product information to reduce the risk of cross contamination.
- Physical segregation within the production area is in place at all times.
- All food handlers employed are trained in all areas of good food hygiene practice.

5.5 **Effective training**

- All food handlers hold a basic food hygiene certificate.
- All food handlers must complete Allergen Awareness course.
- All food handlers adhere to the HACCP (Hazard Analysis & Critical Control Point) best practice food handling standards.
- All food handlers and servers are briefed and trained in the College process, this is reviewed and reinforced on a regular basis.
- All training records will be maintained in the Catering Department. The records will also show annual refresher training.
- There is always a first aider available via the Porters’ Lodge,
- Compliance with training requirements will be reviewed at annual staff appraisals.