



The Spire Church of England Learning Trust

Allergen Management Policy 2026 - 2029

This policy is reviewed and updated by the Chief Operations Officer and is approved on a triennial basis by the Trust Board. Once ratified this will be shared with all schools within the Trust.

This policy will be subject to ongoing review. It may be amended prior to the scheduled date of the next review to reflect changes in legislation where appropriate.

Reviewed: May 2026

Ratified: July 2026

Next review date: May 2029

In collaboration with



We are required by law to provide allergen information to our pupils, staff and visitors. The Food Standards Agency (FSA) regulations cover the 14 most common allergens.

Legal and Regulatory Framework

- Food Safety Act 1990
- Food Safety and Hygiene (England) Regulations 2013
- Food Information Regulations 2014 (as amended)
- Natasha's Law – Food Information (Amendment) (England) Regulations 2019 (PPDS)
- Health and Safety at Work etc. Act 1974
- Equality Act 2010 (reasonable adjustments for pupils with medical needs)
- Worcestershire Regulatory Services Guidance: *Managing Allergens and Food Registration in Educational Settings* (January 2026)

Roles and Responsibilities

The schools are responsible for:

- Identifying pupils with medical food allergies
- Sharing relevant information with catering staff
- Supervision during food service and consumption
- Managing allergens during non-catering activities (class treats, trips, clubs, events)
- Staff training to recognise allergic reactions and emergency response
- Ensuring facilities, equipment and pest control are suitable (shared liability)

The Catering Providers are responsible for:

- Safe food preparation and service
- Allergen information accuracy
- Staff allergen training
- Compliance with Natasha's Law

The 14 allergens are –

1. Celery and celeriac
2. Cereals containing gluten – wheat, rye, barley, oats, spelt or kamut
3. Crustaceans (eg. prawns, lobster, scampi, crab, shrimp paste)
4. Egg
5. Fish
6. Lupin (seeds and flour used in Europe for pastries and breads)
7. Milk
8. Molluscs - mussels, whelks, squid, land snails, oyster sauce
9. Mustard
10. Nuts and nut oil
11. Peanuts
12. Sesame
13. Soya
14. Sulphur dioxide and sulphites

We have nominated suppliers and have a specified product list of foods we purchase from each supplier so we can manage which products contain which allergens.

IMPORTANT – Spire Catering food is freshly prepared in our hub kitchen. Whilst we and our ingredients' suppliers take precautions, we cannot 100% guarantee that any product is free from allergens due to the risk of cross - contamination. Ingredient and allergen information can be found by contacting the hub kitchen on 01905 773362.

Deliveries

All ingredients lists and allergens are checked on all products as they are delivered.

Nuts

We do not store, prepare, or cook with nuts in any of our kitchens. If a product is labelled as “May Contain Nuts” (as it has been manufactured at a site which handles nuts) we label the item or dish as “May Contain Nuts”. We work with our suppliers to limit these products in our kitchens.

Buffets

Buffets are difficult to manage for those with allergies as there is potential for cross contamination of food falling on other foods by customers. There will always be a sign on, or near the buffet table requesting people with an allergy or food intolerance to ask a member of our team for information on the allergens contained in the foods. We also note on the sign the buffet food may not be suitable for those with food allergies as due to potential cross contamination on the buffet table.

Allergen Management

1. The school management provide details and photos of pupils with food allergies/intolerances/other dietary requirements. The Food Standards Agency state that facial recognition is an important factor in managing pupils with allergies or dietary requirements. For GDPR compliance, all pupil details that are supplied to the kitchen have been agreed by the parents/carers. These photos will have notes of food allergies/intolerance/dietary requirements as follows – “No Milk”, “No Pork” etc – there is no requirement to give a reason (ie allergy/religious reasons). These photos should be displayed in the kitchen near the servery and are for the attention of all catering staff.
2. For pupils with a confirmed food allergy, a written allergy risk assessment and management plan will be developed and agreed between the school, parents/carers and the catering provider. This will be reviewed regularly and whenever circumstances change.

Risk assessments may identify the need for:

 - Separate preparation and service
 - Limited menus
 - Alternative arrangements if food cannot be prepared safely
3. Medical food allergies require parental/carer confirmation and medical evidence. Intolerances and dietary preferences are managed differently. This distinction ensures that high-risk medical needs are prioritised
4. Staff are trained in Allergen Awareness.
5. A daily staff debrief informs all staff on any allergens in the lunch dishes for that day. This includes cooking processes, any oil that food is cooked in, marinades, dressings and sauces.
6. As an added precaution, we have a notice in the servery to direct pupils/staff/visitors to inform a member of the Catering Team if they have any food allergies or intolerances so your team can then advise on the ingredients in the dishes.
7. Some pupils have special meals prepared for them in advance to cater for their severe food allergies. These meals are prepared individually and will be wrapped, labelled and stored separately for the pupil.
8. Children under 12 years with a severe allergy are supervised with their lunch choices or issued with a coloured wristband/lanyard or plate.
9. Allergens in the dishes are noted on the menu or on the Allergen Matrix. This includes all foods which manufacturers state “**may contain**” certain allergens. Foods on the serving counter are also labelled with any allergens contained in that dish.
10. We check the information on our menus, allergen matrix and the counter signage are accurate each day.

11. If there are any changes to the allergens published, we place a prominent sign on the counter next to the dish and instruct staff to mention the changes to all pupils choosing that item.
12. Stringent preparation procedures are in place in the kitchen as it is important to prevent cross contamination when preparing foods that can cause allergic reactions. We prepare foods/dishes for people with an allergy separate from other foods to avoid cross contamination.
13. Salad bars are displayed so items containing any of the main allergens are displayed at the front, closest to the server, to avoid spillage from one container to another
14. Separate spoons/tongs are used in all salad display containers
15. We **ALWAYS** double check allergens for any dishes to be issued to a pupil with a food allergy
16. Allergen controls also apply to:
 - Birthday treats
 - Rewards and celebrations
 - Class cooking activities
 - School trips and residentials
 - Breakfast, after-school and holiday clubs
 - Fundraising events involving food

Individual Allergy and Healthcare Plans

Pupils with diagnosed food allergies or a history of anaphylaxis will have an Individual Healthcare Plan and/or Allergy Action Plan in place, developed in partnership with parents/carers and healthcare professionals where appropriate.

These plans set out the child's specific allergies, symptoms, emergency actions and medication and are shared with relevant staff to ensure consistent and safe management across the school day.

Catering-related risk assessments align with, and support, these individual plans. Detailed procedures are set out in the Trust's Supporting Pupils with Medical Conditions policy.

Natasha's Law

"Natasha's Law" requires all pre-packaged foods prepared on site is labelled with a full list of ingredients highlighting any of the 14 main allergens that are present in the ingredients.

Pre-packaged foods include any item that is prepared on site, packaged and displayed for direct sale (ie. on a shelf or chiller). This includes items such as pre-wrapped sandwiches, salads, pasta pots, baguettes, cakes etc.

ANAPHYLAXIS is a severe allergic reaction at the extreme end of the allergic spectrum, affecting the entire body, and can occur within minutes of exposure. The main causes are attributed to nuts, seeds and seafood; nuts being the major food that hits the headlines regularly.

How to recognise an anaphylaxis reaction Early symptoms include

- Itchy, urticarial rash anywhere on the body (raised itchy rash that suddenly appears)
- Runny nose and watery eyes
- Nausea and vomiting
- Dizziness

Danger signs include

- Swelling of the lips, tongue and throat
- Cough, wheeze, tightness of chest or shortness of breath
- Sudden collapse or unconsciousness

For severe symptoms, follow the emergency procedure below:

- Call First Aider, call an ambulance and do not leave person unattended.
- If a pupil's EpiPen device is available, it can be administered into the thigh muscle (through clothing if necessary) by the person themselves or trained personnel.
- Ensure person does go to hospital, even if the initial treatment has reduced the severity of the reaction.

Adrenaline Auto-Injectors (AAIs)

The Trust recognises the statutory requirements arising from **Benedict's Law**, which introduce mandatory allergy safety measures in schools.

In line with current Department for Education guidance and forthcoming statutory requirements, schools will ensure access to emergency adrenaline auto-injectors (AAIs) and that appropriately trained staff are available to recognise anaphylaxis and administer emergency medication.

Detailed arrangements for the storage, management and use of AAIs are set out in the Trust's Supporting Pupils with Medical Conditions and First Aid policies.

Food Business Registration and Food Hygiene Rating Scheme (FHRS)

The provision of food within the Trust is subject to food safety and food standards legislation and oversight by the relevant Local Authority.

The Food Business Operator (FBO) responsible for the preparation of school meals is Spire Catering. Where food is prepared in a hub kitchen and transported for service to schools, the hub kitchen is registered as a food business and is subject to routine inspection under the Food Hygiene Rating Scheme (FHRS).

The Trust and its schools recognise that, even where catering is contracted to an external provider, schools may retain responsibilities where they handle, distribute or serve food, or where they are responsible for premises, equipment, utilities or supervision. In such circumstances, there may be shared or joint responsibility for food safety compliance.

Schools understand that separate food business registration may be required where they:

- Handle or serve food provided by a catering contractor
- Provide food outside the main lunch service, including breakfast clubs, after-school provision or holiday clubs

The Trust is committed to ensuring that:

- Food business registration details remain accurate and up to date
- Any changes to food provision arrangements are notified promptly to Worcestershire Regulatory Services
- Food Hygiene Rating Scheme information is made available to parents/carers, staff and visitors where applicable

This policy is shared with all relevant staff. Catering and school staff receive regular allergen awareness updates

The risk assessments are reviewed:

- Annually
- When a pupil's needs change
- Following incidents or near misses