

IMPACT SAFETY

ALLERGEN MANAGEMENT POLICY

Education Catering

Every child deserves to eat safely and confidently.

Document status	Policy information
Policy owner	Safety Director
Version	1.0
Effective date	1 September 2026
Review date	31 August 2027, or earlier following legal change, serious incident, near miss or material operational change
Applies to	All IFG brands, employees, agency workers and approved food suppliers providing food in education settings in England
Related school requirement	Each school remains responsible for its own published whole-school allergy safety policy, named senior allergy lead, Individual Healthcare Plans and emergency medication arrangements

POLICY STATUS

This is an IFG corporate food allergen policy. It supports schools to meet the Department for Education statutory guidance on allergy safety in schools. It does not transfer the school's statutory responsibilities to IFG and does not replace a child's Individual Healthcare Plan or clinician-issued Allergy Action Plan.

Document purpose and policy statement

Impact Food Group (IFG) will provide food and allergen information through systems and controls designed to protect pupils, enable informed choice and support inclusion. We will comply with food information law and apply the September 2026 Department for Education allergy safety guidance at the catering school interface.

IFG recognises that any food can cause an allergic reaction. Legal allergen declarations focus on the 14 regulated allergens, but safe catering requires accurate ingredient information, individual assessment and effective controls for allergens and medically required dietary needs beyond the regulated 14.

IFG will operate an allergy-aware service. We will not describe a school, kitchen, menu or service as “allergen-free” or “nut-free”, because shared supply chains, kitchens and dining environments cannot support an absolute guarantee. Where a defined recipe or menu is described as excluding an ingredient, this does not remove the need to review supplier information, precautionary allergen labelling and cross-contact risk.

NON-NEGOTIABLE RULE

If the pupil cannot be positively identified, their declaration is incomplete or unverified, the approved meal cannot be confirmed, the label or matrix does not match, or any member of the team is unsure: STOP. Do not serve. Escalate to the Catering Manager and school allergy lead. Provide food only when safety has been confirmed through the approved process.

1. Purpose

The purpose of this policy is to establish the minimum controls for:

- obtaining, verifying, recording and communicating food allergy and medically required dietary information;
- maintaining accurate recipe, ingredient and regulated-allergen information;
- assessing whether IFG can safely meet an individual pupil's needs;
- preventing allergen cross-contact during procurement, storage, preparation, cooking, packing and service;
- positively identifying pupils and meals through at least two robust checks at service;
- providing accessible allergen and ingredient information to pupils, parents, schools and IFG teams;
- training employees in allergen management, allergy awareness and emergency response;
- responding to concerns, substitutions, incidents, allergic reactions and near misses; and
- assuring compliance and learning across IFG's education estate.

2. Scope

This policy applies to food and drink supplied by IFG in maintained schools, academies, free schools, pupil referral units, independent schools, SEN schools, early years provision within schools, sixth forms and other education settings in England. Statutory status varies by setting, but IFG applies the catering controls in this policy as its minimum standard.

It covers breakfast, break, lunch, hospitality, breakfast clubs, after-school provision, packed meals, trips catered by IFG, theme days, tasting and sampling, vending or retail lines under IFG control, food prepared for direct sale, non-prepacked food and externally manufactured products supplied through IFG.

Food brought from home, classroom activities, school-run clubs, parent association events, medication and whole-school emergency management remain under the school's control unless IFG has explicitly accepted responsibility in writing.

3. Principles

- Safety first: commercial, operational or service pressures never override an allergen control.
- Single source of truth: only current, approved recipe, supplier, declaration and pupil information may be used.
- Parent-led declarations: parents or carers provide and update pupil dietary information through the approved process. School staff may assist but must not independently add, change or remove a pupil's allergen declaration.
- Positive identification: the right pupil and the right meal must both be confirmed before handover.
- No assumptions: vegan does not mean milk- or egg-free; gluten-free is a regulated compositional claim; lactose-free milk still contains milk proteins; and "may contain" information must be assessed as a risk.
- Inclusion: pupils with allergies should eat alongside their peers wherever risks can be effectively controlled. Routine separate-table arrangements are not an IFG control.
- Stop and escalate: uncertainty requires service to stop for the affected pupil until resolved.
- Learning culture: all incidents and near misses are reported, investigated and used to improve systems without discouraging timely reporting.

4. Legal and guidance framework

This policy is informed by the following requirements and guidance, as amended:

Framework	Relevance to IFG and schools
Children and Families Act 2014, section 100, as amended by the Children's Wellbeing and Schools Act 2026	Requires specified schools to support pupils with medical conditions and to have, publish and review allergy safety policies, having regard to statutory guidance.
DfE Allergy safety in schools statutory guidance, July 2026	Sets expectations for policy, annual training, identification, IHPs, food provision, medication, emergency response, incident and near-miss learning. Effective for the September 2026 school year.
Food Information Regulations 2014 and assimilated Regulation (EU) 1169/2011	Requires accurate information about the presence of the 14 regulated allergens in food supplied by food businesses.
Natasha's Law / PPDS requirements	Requires the food name, full ingredients list and clear emphasis of regulated allergens on food prepacked for direct sale.
Regulation (EC) 178/2002, including Article 19	Requires unsafe food to be withdrawn and competent authorities notified where applicable after unsafe food has left immediate control.
Regulation (EU) 828/2014, assimilated into UK law	Controls "gluten-free" (20 ppm or less) and "very low gluten" claims.
Food Safety Act 1990; Food Safety and Hygiene (England) Regulations 2013	Establishes core food safety offences, due diligence and hygiene controls.

Framework	Relevance to IFG and schools
Equality Act 2010	Requires avoidance of discrimination and reasonable adjustments where allergy or associated conditions meet the disability definition.
UK GDPR and Data Protection Act 2018	Allergy and medical information is special-category data and must be controlled, accurate, relevant and shared only where necessary.
Health and Safety at Work etc. Act 1974 and RIDDOR 2013	Applies to employee safety and, in defined circumstances, reporting incidents arising from work activity.

INTERPRETATION

The governing body, proprietor or trust retains responsibility for the school's allergy safety arrangements. The DfE guidance expressly states that responsibility must not be left with a Catering Manager. IFG is accountable for the food business activities and services it controls.

5. Definitions

Term	Meaning in this policy
Allergy	An immune-system reaction to a normally harmless substance. Reactions can be mild or severe and may include anaphylaxis.
Anaphylaxis	A potentially fatal systemic allergic reaction affecting Airway, Breathing or Circulation (ABC).
Food hypersensitivity	An umbrella term covering food allergy, food intolerance and coeliac disease.
Food intolerance	A non-immune adverse response to food. It does not cause anaphylaxis, but may cause serious or long-term effects.
Coeliac disease	An autoimmune condition triggered by gluten. It is not a food allergy and requires strict gluten avoidance.
14 regulated allergens	Celery; cereals containing gluten; crustaceans; eggs; fish; lupin; milk; molluscs; mustard; peanuts; sesame; soya; sulphur dioxide/sulphites above the legal threshold; and tree nuts specified in law.
Cross-contact	The unintended transfer of an allergen from one food, surface, person, utensil or process to another.
Precautionary allergen labelling (PAL)	Supplier wording such as "may contain", used following a risk assessment of unintended allergen presence.
Allergen Aware Menu (AAM)	An IFG controlled menu route used in specified primary services. The precise exclusions and suitability criteria are defined in current IFG menu specifications.
Individual Healthcare Plan (IHP)	A school-owned plan recording additional or different arrangements required to support an individual pupil, including meal and emergency arrangements.
Allergy Action Plan	A clinician-issued plan describing symptoms and emergency treatment. It should be attached to the school's IHP where available.
Allergen incident	An event causing harm or exposure, or involving inaccurate/undeclared allergen

Term	Meaning in this policy
	information, incorrect food or failure of a control.
Near miss	An error, omission or system failure that did not cause harm but had clear potential to do so.

6. Responsibilities

6.1 IFG Executive Team and Safety Director

- Approve this policy and provide adequate people, systems, training and investment for implementation.
- Review significant allergen risks, trends, serious incidents and overdue actions.
- Ensure commercial decisions, acquisitions and mobilisations do not weaken allergen controls.

6.2 Safety Director and Safety Team

- Own the policy, interpret legal requirements and maintain IFG standards.
- Set incident classification, investigation, escalation and regulatory-notification requirements.
- Provide assurance through audits, risk profiling, trend analysis and governance reporting.
- Liaise with IFG's Primary Authority or Local Authority as appropriate.
- Lead or support significant allergen investigations and verify recurrence controls.
- Oversight and influence across all functions in respect of allergen management

6.3 Food, Nutrition, Procurement and Technical Teams

- Approve menus, recipes, product specifications, substitutions and supplier information before use.
- Maintain a controlled recipe and ingredient system showing regulated allergens and full ingredient information.
- Assess allergens outside the regulated 14 when determining whether an individual can be safely catered for.
- Define and authorise suitable menu routes, including AAM where applicable.
- Prevent unapproved local recipe or product changes.

6.4 Operations Directors, Operations Managers and Operations Support

- Ensure sites have trained teams, current systems, equipment, labels and time to operate safely.
- Confirm each school has named contacts and an agreed school/IFG information-sharing process.
- Escalate staffing, facilities, supply or service conditions that compromise controls.
- Complete required site checks and ensure actions are closed within agreed timescales.

6.5 Catering Manager / Chef Manager

- Implement this policy and current IFG procedures at site.
- Maintain the approved pupil list, allergen folder/system, recipes, matrices, labels and briefing records.
- Deliver the mandatory Daily Allergen Briefing before every service.
- Allocate the Allergen Buddy and lead the Allergen First Service checks.
- Stop service to an affected pupil whenever identification, information or meal safety is uncertain.
- Report incidents, near misses, changes and control failures immediately.

6.6 All IFG employees and agency workers

- Complete required training before carrying out unsupervised allergen-related duties.
- Follow recipes, labels, segregation and service checks exactly.
- Never guess, substitute, remove a label, alter a matrix or reassure a customer without verified information.
- Raise concerns immediately and support an emergency response in line with training and the school's plan.

6.7 School governing body, trust and named senior allergy lead

The school is responsible for its statutory whole-school allergy arrangements, including:

- a dedicated, published and at least annually reviewed allergy safety policy;
- a named senior allergy lead and governing-body oversight;
- identifying pupils requiring support and producing/reviewing IHPs;
- obtaining consent, storing and maintaining prescribed and spare emergency medication;
- whole-school allergy awareness and emergency-response training;
- sharing necessary, accurate and timely pupil information with IFG;
- arrangements for packed lunches, snacks, classroom food, clubs, events and trips outside IFG control;
- ensuring pupils are supervised and identifiable at meal service as agreed; and
- recording, reporting and learning from school incidents and near misses.

6.8 Parents/carers and pupils

- Provide complete, accurate and current information using the approved declaration process.
- Upload requested evidence and a current photograph and respond promptly to clarification.
- Notify changes before the pupil selects or receives further meals.
- Understand that a declaration is not approved until verification and menu assignment are complete.
- Follow the agreed ordering and identification process and ask before consuming food if uncertain.

7. Allergen declaration, verification and change control

SINGLE SOURCE OF TRUTH

The approved digital platform or controlled IFG record is the source used for catering decisions. Informal emails, handwritten notes, verbal messages or unverified school-system flags must trigger follow-up; they do not by themselves authorise a meal.

7.1 New declarations

1. The parent/carer completes the approved allergen declaration, including the pupil's details, all relevant allergens or dietary conditions, required information outside the regulated 14, supporting evidence where requested, and a current photograph.
2. The designated verification team reviews completeness and evidence. This will be the authorised Customer Services, IFG Primary Support function, Safety team or Nutrition team, according to the operating model.
3. Nutrition/Technical determines the suitable menu route and records the decision. The site must not make a local suitability decision outside the approved process.

4. The school and site receive controlled confirmation that the declaration is verified and the menu route is active.
5. The Catering Manager confirms the pupil appears correctly in service controls before the first meal is provided.

7.2 Changes and existing pupils

For existing SchoolGrid schools from September 2026:

- new pupils must complete the new allergen declaration process;
- any addition, amendment or removal of allergen information must be made by the parent/carer through the declaration process;
- school administrators must not independently add, change or remove allergen declarations;
- schools should support parents who have accessibility or digital difficulties, without changing the substance of the parent's declaration; and
- the current approved arrangement remains in place until the change is verified, unless IFG or the school suspends meal provision on safety grounds.

7.3 Incomplete, conflicting or urgent information

Where information is incomplete, contradictory, out of date or received at short notice, IFG will not guess. The matter must be escalated to the verification/Nutrition function. Until resolved, the pupil may receive only an option confirmed as safe through the authorised process. If no option can be confirmed, the school and parent must agree an interim arrangement.

7.4 Information retention and privacy

Only information necessary to provide safe food and support the agreed service may be accessed by IFG personnel. Pupil allergy information and photographs must be stored in approved systems or controlled staff-only locations, kept accurate, shared on a need-to-know basis and removed or archived in line with IFG's retention schedule and contractual data arrangements.

8. Menu suitability and reasonable adjustments

- IFG will make reasonable efforts to provide a safe and inclusive meal where adequate information and controls are available and it is safe to do so.
- A requested adjustment is subject to a documented feasibility assessment. IFG must not accept a need that cannot be reliably controlled in the specific supply chain, kitchen and service environment.
- The school must capture pupil-specific meal and snack adjustments in the IHP where required.
- Pupils eligible for free school meals must not be disadvantaged because of allergy; the school and IFG will work together on reasonable adjustments.
- Where an IFG AAM applies, the current approved specification determines exclusions. The menu must not be described more broadly than that specification.
- For primary AAM services, IFG's operating standard is to treat relevant "may contain" statements as containing the allergen for menu-suitability decisions.
- A vegan or vegetarian descriptor is not an allergen-safety statement.

- A product or recipe may not be claimed as gluten-free unless the claim is supported in accordance with the legal compositional threshold and IFG approval.

9. Recipe, ingredient and allergen information

9.1 Controlled data

- Only approved recipes and products may be used for pupils with food allergy.
- Full ingredient and regulated-allergen information must be available for every item offered.
- The current allergen matrix, recipe system or approved platform must match the food actually prepared and served.
- Information must be available to parents/carers and in a form the pupil can access or check independently, appropriate to age and ability.
- Allergen information provided verbally must be supported by current written information. Employees must never answer from memory.
- Allergens outside the regulated 14 and food intolerances must be considered through the individual declaration, ingredient information and menu assessment; they are not added to the statutory 14-allergen matrix unless the system supports this accurately.

9.2 Labels

- PPDS food must carry the food name, full ingredients list and emphasised regulated allergens.
- A missing, damaged, illegible or mismatched label invalidates the meal for service until corrected through an authorised verification process.
- Labels must be generated from approved data. Handwritten replacement labels may be used only where an IFG procedure expressly permits them and a documented independent check is completed.

9.2.3 Labels for Allergen meal process

- Individually prepared allergen meals must be sealed or otherwise protected as specified, clearly labelled with the pupil's name, school, approved menu/meal, relevant control information and date/service.
- If label has missing information, is damaged or cannot be clearly read, then the meal must NOT be served until corrected through an authorized verification process.
- This must be reported as a near miss via Evotix platform

9.3 Accessibility

Allergen and ingredient information must be clear, accurate and easily accessible. Sites will display the statutory allergy/intolerance sign where appropriate and make the approved matrix or digital information available at the point of choice or service. The Allergen Buddy supports customers to locate and understand the information but does not replace the written record.

10. Procurement, delivery and substitution

- Suppliers and products must be approved through IFG's procurement and technical process.

- Specifications, ingredients and PAL must be reviewed before a product is approved and whenever the supplier notifies a change.
- Deliveries must be checked against the order and approved product. Unexpected substitutes must NEVER be used as ingredients within the allergen meal process. Otherwise they must be quarantined from use within meals until allergens have been examined and a manual allergen matrix is completed and approved.
- No local product or ingredient substitution is permitted for an allergen meal. If allergen meals cannot be produced then a safe meal must be agreed for all affected pupils and approved by Operations manager/ Safety team/ nutrition team.
- If a menu changes at short notice, statutory allergen requirements and individual pupil controls still apply. The change must be highlighted to the team, school and affected customers as appropriate.
- Product withdrawals and recalls must be actioned immediately in accordance with IFG's recall procedure, including traceability and confirmation from every affected site.

11. Storage and cross-contact prevention

- Store approved allergen meals and ingredients in clearly identified, closed packaging in the designated location.
- Prevent leakage, spillage and contact from other products; store higher-risk (foods containing allergens) open products below or away from protected foods as specified.
- Use designated or effectively cleaned equipment and utensils. Warm soapy water and the approved cleaning method must be used; wiping or brushing alone is not an adequate allergen clean.
- Wash hands with soap and water before allergen-controlled preparation and after handling other foods. Alcohol hand gel alone does not remove food allergens.
- Prepare controlled meals first or in a protected time/area as defined by the site's process.
- Keep allergen meals covered, sealed and labelled after preparation.
- Do not share oils, water, grills, utensils, cloths, serving equipment or work areas where this would introduce an unmanaged cross-contact risk.
- Maintain good housekeeping.

12. Preparation, cooking and packing

6. Review the day's verified pupil list, approved menu, recipe, ingredient information and stock before production.
7. Complete the Daily Allergen Briefing and allocate named responsibilities.
8. Check the work area, equipment, hands, clothing and ingredients before starting.
9. Prepare each controlled meal to the approved recipe. Do not improvise.
10. Keep the meal protected throughout cooking and assembly.
11. Complete the required independent verification of recipe, ingredients, label and pupil details.
12. Seal or cover, label and place in the controlled holding location.
13. Record completion using the approved logbook or platform.

13. Service controls

13.1 Daily Allergen Briefing

A documented briefing is mandatory before every service and whenever the menu, stock, team or pupil information changes. It must cover:

- pupils expected, photographs and declared needs;
- approved meals and any absent, late or changed orders;
- menu changes, substitutions and unavailable items;
- who is the Catering Manager/service lead and who is the Allergen Buddy;
- location of labelled meals, matrices and ingredient information;
- the two identification checks and handover method;
- the school allergy lead and how to summon emergency help; and
- the Stop–Think–Act rule for uncertainty.

13.2 Allergen First Service and Allergen Buddy

Controlled allergen meals are prioritised at the start of service where the operating model requires this. A visible Allergen Buddy, identified by the current IFG purple uniform item, must be present at the point of service to support checks and access to information.

13.3 Two-check identification standard

At least two independent, robust methods must confirm both the pupil and their approved meal before handover. The exact combination must be agreed with the school and appropriate to age, capacity and service model.

Check	Examples	Minimum expectation
Pupil identity	Current photograph on controlled list/platform; named school staff confirmation; wrist bands/ lanyards/ place mats/ID cards, approved pre-order/account identification; pupil confirmation where appropriate.	Never rely on visual recognition alone. One check must link to a controlled record.
Meal identity	Pupil-specific label; sealed meal; approved order screen; independent label-to-list check.	Meal label, food and current approved order must agree.
Final handover	Named IFG server/Allergen Buddy gives the verified meal directly to the verified pupil or agreed responsible adult.	No unattended collection, swapping or passing through other pupils.

13.4 Primary service

- Use the approved pre-order system and current verified pupil information.
- Where the AAM is assigned, prepare and serve only the assigned AAM option unless an authorised change is recorded.
- All allergen meals must be pre-plated, protected, labelled and served using the agreed first-service process. (Applies to main meal, side salad and dessert)
- School staff must support pupil identification and dining-room supervision.

- Any individual seating adjustment must be school-led, proportionate, documented in the IHP and reviewed for inclusion and dignity.

13.5 Secondary service

- Provide clear written allergen and full ingredient information at the point of choice and on request.
- Use labelled prepacked items or clear service tickets/matrices in line with the service model.
- The Allergen Buddy must support pupils to check information and understand changes.
- Pupil independence is encouraged, but it does not remove IFG's duty to provide accurate information or apply agreed controls.
- Where an individual arrangement requires early arrival, an LSA, a pre-order or direct handover, it must be recorded and communicated.

13.6 Samples, theme days, hospitality and special events

Sampling or tasting involving pupils is prohibited unless it is included in an approved IFG process with verified allergen information, school authorisation, pupil controls and service briefing. Theme days, hospitality and special events must be planned early and follow the same recipe, information, identification and cross-contact standards as the normal service.

14. School interface and Individual Healthcare Plans

The school owns and coordinates the IHP. IFG must contribute accurate catering information and agree deliverable meal arrangements, but must not provide clinical advice or accept unachievable controls.

- The IHP should identify meal and snack arrangements, required adjustments, service checks, supervision, communication, trips and emergency response.
- Where the IHP conflicts with IFG's verified declaration or approved menu route, service must pause for the affected pupil until the school, parent and IFG resolve the conflict.
- Relevant information must reach the catering team before the pupil's first meal. For mid-term changes, every effort must be made to establish safe arrangements promptly; no assumed interim provision is permitted.
- The school must notify IFG of relevant starters, leavers, absences, visits, changes and plan reviews.
- IFG representatives should participate in meetings with parents/carers where needed to explain available meals and controls.

15. Emergency response

EMERGENCY PRIORITY

If anaphylaxis is suspected: follow the school's emergency plan and training immediately. Do not delay while seeking certainty about the allergen. Summon the school's trained response, call 999, bring medication to the person, and support prompt adrenaline administration by a trained/authorised person. A second dose may be required after 5 minutes if there is no improvement, in line with the action plan and training.

15.1 IFG team actions

14. Stop service and protect the affected pupil from further exposure.
15. Immediately summon the school's trained emergency response and state "suspected anaphylaxis" if ABC symptoms are present.
16. Call 999 or ensure this is done without delay, following the school's plan.
17. Bring the person's medication/spare device to them; do not make them walk to it.
18. Support administration only within the individual's training, competence and the school's arrangements. First aid training alone is not a substitute for allergy emergency-response training.
19. Preserve the food, packaging, labels, recipe, utensils, CCTV where available and relevant records. Do not discard or alter evidence.
20. Notify the Catering Manager, Operations Manager, Safety Business Partner and school allergy lead immediately.
21. Record the event in Evotix and the required site/school records as soon as practicable.

15.2 School responsibilities

The school is responsible for its emergency plan, consent, storage and availability of prescribed/spare AAIs and inhalers, trained responders, parent notification, pupil supervision and liaison with emergency services. IFG will cooperate fully and ensure its pupil-facing staff receive the school-specific briefing.

16. Incident and near-miss management

Every allergen incident, reaction, incorrect meal, inaccurate label or information event, control failure and near miss must be reported immediately. Delayed symptoms or parent-reported events must also be captured.

Stage	IFG minimum action
Contain	Stop affected food/service; identify potentially exposed pupils/products; quarantine stock; preserve evidence; provide emergency support.
Notify internally	Catering Manager → Operations Manager → Safety Business Partner/Safety Team. Serious events require immediate senior escalation under the Incident Action Plan.
Record	Record promptly in Evotix and the digital/site logbook. Capture who, what, when, where, why known, response, emergency services and outcome.
Notify school/parent	Coordinate with the school. The school leads parent communication about the pupil; IFG provides accurate factual catering information.

Stage	IFG minimum action
Assess external reporting	The Safety Team assesses Local Authority/Primary Authority, FSA, RIDDOR, supplier and healthcare-professional notification requirements. Sites must not make uncoordinated regulatory statements unless urgent law or safety requires it.
Investigate	Use proportionate root-cause analysis. Serious incidents and significant near misses require formal investigation, evidence preservation, responsibilities and timescales.
Learn	Review recipes, systems, IHP interface, policy, training and supervision. Share learning and verify that corrective actions prevent recurrence.

ARTICLE 19

Where IFG has reason to believe unsafe food, including food containing an undeclared allergen, has left its immediate control and may pose a risk to consumers, the Safety Team will assess withdrawal/recall and competent-authority notification without delay. A contained wrong-meal event still requires recording and review even where formal food-safety notification is not required.

17. Training and competence

17.1 Core annual training

All IFG staff present when pupils are on site, including agency and relevant temporary workers, must receive allergy awareness and emergency-response training at induction and at least annually. The programme must cover:

- allergy, anaphylaxis, asthma, coeliac disease and intolerance;
- the regulated 14 allergens and the fact that any food can cause a reaction;
- symptom recognition, ABC signs and emergency actions;
- how to locate emergency medication and use trainer devices within the school's arrangements;
- IFG declarations, recipes, matrices, labels, PAL and PPDS requirements;
- cross-contact prevention, cleaning and handwashing;
- pupil and meal identification, and Allergen Buddy;
- the site's school allergy policy (specific arrangements that impact the catering team and emergency arrangements;
- incident/near-miss reporting and preservation of evidence; and
- wellbeing, inclusion, dignity and the risk of allergy-related bullying.

17.2 Role-specific competence

Catering Managers, chefs, Allergen Buddies, verification teams, Nutrition, Procurement, Technical, Operations and Safety personnel must receive role-specific training and practical assessment. Records must show the content, date, trainer, attendees and competence outcome. Anyone not yet competent must be supervised and must not independently perform critical allergen tasks.

17.3 Daily briefing

Annual training does not replace the Daily Allergen Briefing. The briefing is an operational control tailored to that service and must be recorded.

18. Facilities, equipment and staffing

Operations must assess whether each kitchen and service can deliver the approved controls. The assessment must consider space, storage, equipment, cleaning, service layout, staffing, competence, supervision, connectivity and printing/label capability.

If facilities, staffing or technology fail:

- stop affected allergen meal preparation or service;
- use only the authorised contingency procedure;
- do not rely on memory, screenshots or outdated printed matrices;
- escalate immediately to Operations and the school; and
- resume only when current information and critical controls are restored.

19. Assurance, monitoring and review

Control	Evidence	Frequency / owner
Daily service control	Briefing record; verified list; labels; meal checks; exceptions.	Every service / Catering Manager
Operational check	Observation of preparation and service; training; systems; actions.	Risk-based / Operations
Safety audit	High-risk and full audit criteria; document and practice checks.	Risk-profiled programme / Safety Business Partner
Data review	Incidents, near misses, late actions, repeat causes, training and audit trends.	Monthly / Safety Team and Operations
Leadership assurance	Executive site checks and allergen-first service observations.	Planned programme / Senior leaders
Policy review	Legal/guidance changes, incidents, feedback, audit outcomes, process changes.	At least annually / Safety Director

Non-conformances must be risk-rated, assigned to a named owner and closed by the required date. Critical failures require immediate containment and may require suspension of the affected service. Closure evidence must demonstrate that the control is working, not merely that an action was stated.

20. Communication and complaints

- IFG will provide schools and parents with clear guidance on the declaration process, information required, verification status and how to access allergen/ingredient information.
- Material changes to menu, product, process or service controls will be communicated before implementation.

- Complaints or concerns involving allergen safety must be escalated as potential incidents until triaged by the Safety Team.
- Communication following an event must be factual, coordinated and protect personal data. No employee may speculate on cause or liability.

21. Policy exceptions

No exceptions to the allergen policy/ procedures. A parent may request an alternative menu route, but IFG will approve it only after a documented risk assessment confirms that the request can be safely and lawfully delivered. Any exception to this policy requires written approval from the Safety Director and the relevant operational/technical owner, with a documented rationale, controls and review date.

22. Records

Records must be completed contemporaneously, legible, attributable and retained in the approved system. These include declarations, verification decisions, menu assignments, IHP catering extracts, recipes, specifications, matrices, labels, briefings, training, cleaning checks, service checks, incidents, investigations, regulatory advice, audit findings and action closure.

Appendix A. School–IFG responsibility matrix

Activity	School / trust	IFG
Published whole-school allergy safety policy	Accountable and responsible	Consulted; aligns catering section
Named senior allergy lead	Accountable and responsible	Names IFG site/operational contacts
Identify pupils and initiate IHP	Accountable and responsible	Provides catering input
Parent allergen declaration	Facilitates and shares requirement	Owns approved catering declaration/verification workflow
Clinical diagnosis and Action Plan	Obtains from parent/healthcare professional	Does not diagnose; uses relevant agreed information
Menu suitability assessment	Consulted; confirms wider support	Accountable and responsible
Recipe, ingredient and allergen accuracy	Receives assurance/information	Accountable and responsible for IFG food
Meal preparation and labelling	Informed	Accountable and responsible
Pupil identification at service	Provides accurate list/staff supervision/physical identifier	Applies agreed two-check handover
Medication, consent and emergency plan	Accountable and responsible	Staff trained to recognise, summon help and support plan
Food incident investigation	Joint where school systems involved	Leads for IFG food/process; joint learning
Regulatory notification	For school-controlled food/activity where	Safety Team assesses IFG food-business

Activity	School / trust	IFG
	applicable	duties and coordinates advice

Appendix B. Service stop criteria

Do not prepare or serve an allergen-controlled meal where any of the following applies:

- there are no records for the pupil;
- the declaration is incomplete, unverified, expired, changed or conflicting;
- the approved menu route is not assigned or cannot be confirmed;
- the allergen meal check has identified that unsafe food has been ordered by the parent;
- an ingredient has been substituted or its specification has changed without approval;
- the label is absent, damaged, illegible or attached to the wrong allergen meal;
- the meal has been left unprotected or cross-contact may have occurred;
- required trained staff, school identification support or service controls are unavailable;
- technology failure prevents access to current controlled information and no authorised contingency is available; or
- any person involved is unsure.

Appendix C. Daily Allergen Briefing: minimum record

Field	Minimum content
Date / service / school	Breakfast, break, lunch, hospitality or event
Service lead	Named Catering Manager or authorised deputy
Allergen Buddy	Named trained person and visible identifier
Expected pupils	Count, names/photos accessible in controlled system; changes/absences
Meals	Approved choices, labels, location, unavailable items
Changes	Menu/product/substitution/system/staffing changes and authorisation
Two checks	Pupil identification method 1 + method 2; meal check and handover
Emergency	School allergy lead; method to summon help; medication location awareness
Team confirmation	Names/signatures or approved digital acknowledgement

Appendix D. Incident and near-miss evidence checklist

- pupil/customer and school details; declared allergens and approved menu route;
- date, exact time, location, service and people present;
- food item, portion, batch, recipe, ingredients, supplier and traceability;
- label, matrix, platform/order records and photographs;
- preparation, cleaning, storage, service and briefing records;
- symptoms, timing, emergency actions, medication, 999 and outcome;

- staff, school and witness accounts;
- remaining food, packaging and utensils secured;
- CCTV or system audit trail preserved where lawful and relevant;
- immediate containment, potentially affected people/products and communications; and
- root cause, contributory factors, corrective actions, owners, deadlines and verification.

Appendix E – Controlled references

- [Department for Education Allergy safety in schools statutory guidance \(July 2026\)](#)
- [Department for Education Supporting pupils with medical conditions at school](#)
- [Food Standards Agency Allergen guidance for food businesses](#)
- [Food Standards Agency Allergen guidance for institutional caterers](#)
- [Food Standards Agency Allergen information for non-prepacked foods: best practice](#)
- [Food Standards Agency Allergen checklist for food businesses](#)
- [Food Standards Agency PPDS allergen labelling / Natasha's Law](#)
- [HSE Incident reporting in schools](#)

DOCUMENT CONTROL

Printed copies are uncontrolled. Users must confirm that they are using the current approved version and current supporting procedures, menu specifications, forms and systems.