## CORPUS CHRISTI COLLEGE

## FOOD ALLERGEN MANAGEMENT POLICY

## Version

Author:
Date approved by Executive Body
1.0

Domus Bursar
19 April 2021

Revision history

| Version | Author | Summary of changes | Approval <br> date | Full review <br> due |
| :--- | :--- | :--- | :--- | :--- |
| 1.0 | Domus Bursar | Full policy review | $18 / 4 / 2021$ | April 2022 |
|  |  | Review for compliance with <br> Natasha's Law |  | October 2021 |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

## Table of Contents

Table of contents ..... 2
Policy ..... 3
Statement. ..... 3
Objectives of the policy ..... 3
Background. ..... 3
What is a food allergy ..... 3
What is a food intolerance ..... 3
Who is at risk ..... 3
Allergy labelling legislation. ..... 4
The 14 major allergens ..... 4
Procedures and training. ..... 4
Responsibilities. ..... 4
Supplier product information ..... 5
Good kitchen and service practices. ..... 5
Managing cross contamination. ..... 5
Effective training. ..... 5
Good communication .....  6
Pre-packed foods - Natasha's Law. ..... 6
Understanding and anticipating the needs of College members .....  6
Appendix 1 Allergen identification table. ..... 7
Appendix 2 Dining with food allergies or intolerances. ..... 9
Appendix 3 Production Label ..... 10
Appendix 4 Food passport. ..... 11
Appendix 5 Cafeteria daily menus. ..... 12
Appendix 6 Daily cafeteria allergen sheet ..... 13
Appendix 7 Location of allergy data sheets. ..... 14
Appendix 8 Event allergen identification sheet. ..... 15
Appendix 9 Emergency response procedure. ..... 16
Appendix 10 Location of allergy warning signs. ..... 17
Appendix 11 Allergen labelling flow chart. ..... 18
Appendix 12 Dietary card example. ..... 18
Appendix 13 PPDS label example. ..... 19

# 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.

Corpus Christi College
University of Cambridge

### 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 aller-genic 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).

An allergen identification table is set out in (Appendix 1).
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. In some cases, people only need to avoid these when raw and can have them cooked.

## 5. Procedures and Training

### 5.1 Responsibilities

- The Executive Head Chef, or in his absence the Senior Sous Chef, or shift leader is responsible for ensuring that any food provided for College members, staff or visitors with a food allergy is appropriate for their needs.
- The Executive Head Chef will ensure that allergen information is provided on all food/listed in the list of 'Common Food Allergens' listed above. This information will be supplied in Allergy Data Sheets that can be easily seen by College members and visitors. This also applies to food that is pre-packed such as salads etc.
- An allergen ambassador will be identified from the staff team for every food service shift
- College members, staff and their guests are required to clearly and accurately communicate food allergies and intolerances using the meal booking system or (for a special event) notifying the Conference Office, in accordance with (Appendix 2).

Corpus Christi College
University of Cambridge

### 5.2 Supplier product information

- Any new products supplied are checked for allergen information.
- Suppliers are routinely audited by an external body and allergen controls form part of these audits


### 5.3 Good kitchen and service practices

- General food labelling within the kitchen is recorded on a production label (Appendix 3)
- All dishes produced within the College will have a Food Passport (Appendix 4) highlighting the know allergens contained within the dish.
- All cafeteria daily menus (Appendix 5) will be labelled with all known allergens contained within the dish, these are also recorded on the Daily Cafeteria Allergen Identification sheet (Appendix 6) that can be easily seen by College members and visitors. The location of Allergy Data Sheets is set out in (Appendix 7).
- All formal dinners will use an Event Allergen Identification Sheet (appendix 8) to indicate the allergen content of the meal, this will be used during the pre-service briefing for both kitchen and front of house staff and displayed in the servery during service.
- For each event all Food Passports, Allergen Identification sheets and menus will be stored together in the appropriate Allergen folder with the chef in charge's name on it, these will be stored and kept for a month.
- All food produced for people with food allergy or intolerance will be placed away from other food, covered and clearly marked.
- At the point of service the Allergen Ambassadors must check that the special meal ordered for the person with a food allergy or intolerance has been supplied and is appropriate for the person it has been prepared for.
- Staff are aware to keep serving utensils separate to avoid cross contamination.


### 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 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, and at Old House, at least one first-aider in the catering department is allocated on shift at any one time. All catering department staff must be trained in the signs and symptoms of an allergic reaction and emergency response procedures - (Appendix 9).
- Compliance with training requirements will be reviewed at annual staff appraisals

Corpus Christi College
University of Cambridge

### 5.6 Good communication

- Allergen warning signs are located in several places around the College, ensuring a customer must pass at least 2 before they dine (Appendix 10). These can be found in the Porters Lodge, Entrance to Hall stairs, Catering Notice Board by cafeteria, C passage Fellows Entrance, Leckhampton Kitchen and Leckhampton House Lobby (MCR Notice Board).
- Allergen Labelling Documentation Flow Chart is displayed in the kitchen, Pantry and Leckhampton (Appendix 11).
- All Formal Dinner menus contain the line 'for information on the allergens found in this menu please speak with the duty butler
- Staff are trained to escalate any concerns a customer may have regarding food intolerance to a line manager if they are unsure of product content.
- Before all events, both internal and external, dietary requirements are sought prior to the event in order that meals can be safely produced, table plans are widely used to highlight dietary requirements, where table plans are not used Dietary Labels are given to the diner to place in front of them to assist in identifying them to the servers (Appendix 12).
- Where dishes contain potentially dangerous allergens, they are clearly labelled at point of sale. This labelling is also carried through onto menus.


### 5.7 Pre-Packed Foods (PPDS Food Labelling - Natasha's Law)

The requirements under this new legislation are given below. The College processes to ensure compliance will be developed during summer 2021 and this policy will be updated to reflect the detailed procedures adopted.

- Allergens are to be emphasised on ALL food packaging
- Food businesses must emphasise the 14 allergens on their product labels. For example, this could be done by listing them in bold, contrasting colours and underlining. Some may also use an allergy advice statement on their products to explain this, for example: Allergy Advice: for allergens including cereals containing gluten, see ingredients in bold or Allergy Advice: for allergens, see ingredients in bold and other similar types of statements
- All ingredients information in one location
- Information about allergenic ingredients will be located in a single place, i.e. the ingredients list. This means that the voluntary use of the current types of allergy boxes (such as: 'Contains nuts') that provide a short cut to allergen information also given in the ingredients list, will no longer be allowed
(An example label can be found at the end of this document (Appendix 13)


### 5.8 Understanding and anticipating the needs of College members

- The College asks college members and staff to communicate their food allergens and intolerances using the meal booking system as outlined in 5.1. In addition, the College asks new College members and staff to declare any allergies or intolerances when they join the College, and this information is used to help plan our menus and ensure that staff, fellows and students' needs are anticipated and met when they dine in college.


## Appendix 1.

## Allergen Identification Table.

The examples given are not exhaustive but indicate products commonly containing these allergens.

| Gluten containing cereals, e.g. Wheat, <br> Rye, Barley, Oats, Spelt and Kamut | Bread, wheat flour, biscuits, crackers, <br> pasta, breakfast cereals (including items <br> like breadcrumbs and batter), cakes, <br> pastry, semolina, soya sauce. <br> It is also found in many processed foods <br> such as soups, gravies, sauces, sausages, <br> haggis, fish cakes and all processed foods <br> must be checked to ensure they are gluten <br> free. |
| :--- | :--- |
| Celery and Celeriac e.g. Stalks, Seeds and <br> Leaves | Salads, soups and celery salt, stock cubes, <br> stew pack, some meat products |
| Eggs. e.g. Hens, Duck, Quail, Goose, Gull <br> and Guinea Fowl | Cakes, sauces, pasta, mayonnaise, <br> glazed produces, some meat products <br> (e.g. meatloaf, used as a binder), quiche, <br> mousse, foods brushed with egg, Quorn |
| Fish, Crustaceans and Molluscs e.g. all <br> Fish, Prawns, Lobster, Crab, Clams, <br> Oysters, Mussels and Langoustine | Soy and Worcestershire sauce. Thai fish <br> sauce, relish, some salad dressing, fish <br> extracts, oils and paste |
| Milk. e.g. Cows, Sheep and Goat | Milk powder, yoghurt, butter, margarine, <br> cheese, cream, ghee, milk glazed products, <br> ice cream, custard and other milk puddings <br> Milk power and milk products are used in <br> many manufactured products. <br> Some processed meats, chocolate, some <br> canned fish, Quorn. |
| Mustard | Mustard paste, seeds, leaves, flour, salad <br> dressings, marinades, soups, sauces (e.g. <br> cheese sauce), curries, some meat <br> products, occasionally cheese scones. |
| Peanuts | Arachis or groundnut oil, peanut flour, satay <br> sauce, refined peanut oil. <br> Cakes, biscuits, ice cream desserts, <br> breakfast cereal, salad dressing, <br> confectionary and vegetarian products. |


| Tree nuts e.g. Walnuts, Cashew, Pecan, Brazil, Pistachio, Macadamia, Almonds, Hazelnut, Chestnut | Cakes, biscuits, sauces, desserts, bread, crackers, ice cream desserts, praline (hazelnut), some choc spreads, nut butters, essences and oils, marzipan and frangipane (almond), pesto, nut salad dressings, breakfasts, confectionary, vegetarian products. Botanically, pinenuts are seeds and coconuts are drupes, most people allergic to nuts can safely eat these BUT small numbers of people may independently be allergic to |
| :---: | :---: |
| Sesame seeds | Oil or paste, tahini, houmous, furikake, gomashio, bread |
| Soya e.g. Flour, Tofu, Beancurd, Textured Soya Protein, Soy Sauce and Edameme Beans | Tofu, textured vegetable protein, soy sauce, soy bean flour used in cakes, biscuits, pasta, burgers, sausages, confectionary. Dairy products made from soya beans including soya milk and some ice creams |
| Sulphur Dioxide and Sulphites | Some meat products, stock cubes, bouillon mix, fruit juice drinks, dried fruit/vegetables, wine, beer, cider |
| Lupin Seeds and flour | Some types of bread and pastries, e.g. waffles particularly those manufactured in France and Belgium) |

## Appendix 2.

## Dining with Food Allergies or Intolerances

## College members and visitors with food allergies dining in the College

The risks of eating food prepared by others can be reduced significantly through good communication. It is the responsibility of the person with the food allergy to ensure that the correct steps are carried out to reduce as many of the risks as possible.

## What should College members do?

1. As soon as you join the College, you must complete the Colleges Allergy and Medical Questionnaire that is provided by the College nurse/tutorial, any relevant information is then passed to the catering department.
2. If you have a life-threatening food allergy. A meeting will be arranged to put in place a protocol. If you carry lifesaving medication like an EpiPen, you must carry this medication with you at all times when you are in the College.
3. At Cafeteria, you should check the daily menu on display. If you are allergic to a food that is not on the regulatory list, please ask a member of staff who will check with the chef to ensure the food you eat is safe to do so.
4. At Cafeteria, you should only eat the food on offer if you are content that the person you have informed about your food allergy has clearly understood everything you have communicated. Food service staff are trained to seek assistance if they are unsure what is in the food.
5. At formal halls, students must ensure they collect the appropriate Dietary card upon entry to hall and have this displayed at their place setting throughout the meal.

## What should guests attending conferences and events do?

1. Advise your event organiser about your food allergy as soon as possible before you arrive at the College.
2. At food service, you should check the Data Allergy Sheet on display. If you are allergic to a food that is not on the regulatory list, it will not be included on the Data Allergy Sheet provided.
3. You should make yourself known to a member of the service staff to communicate clearly your food allergy. It is advisable to give the College staff a clearly written or typed card with the foods you need to avoid. Information regarding your food allergy will be known to the Kitchen if your event organiser has passed this information to the Conference \& Events Office.
4. You should only eat the food on offer if you are content that the person you have informed about your food allergy has clearly understood everything you have communicated. Food service staff are trained to seek assistance if they are unsure what is in the food.

Appendix 3.

Production Label

## FOOD NAME:

## OPENING DATE:

## PREP DATE:

## FROZEN DATE:

THIS ITEM CONTAINS THE FOLLOWING ALLERGENS:

```
\square PEANUTS
\square TREE NUTS
\square FISH/ FISH SAUCE
\square EGGS
\square SHELFISH / CRUSTACEANS
\square SESAME SEEDS
\square MILK
\square SOYA/ SOYBEANS
\square CEEERY
\square MUSTARD
\square WPIN
\square MOLWSCS
\square GUTEN
\square SULPHTES
```

Appendix 4.

Food Passport


## Appendix 5.

## Cafeteria Daily Menu



Appendix 6.

## Daily Cafeteria Allergen Data Sheet



## Appendix 7.

## Location of Allergy Data Sheets in Corpus Christi for Customer use.

| Venue - Old House | Location of Allergy Data |
| :--- | :--- |
| Cafeteria (Students) | Old House Servery |
| Fellows Lunch | Oriel Window |
| High Table Dinner | Please speak to Duty Butler |
| Formal Hall (student) | Please speak to Duty Butler |
| Hall, Parker Room, NCR, Master's Lodge - Served Dinners | Please speak to Duty Butler |
| Harley Mason Room, Law Room, i4, McCrum Foyer, <br> Master's Lodge, Marquee, Old Court, New Court, <br> Fellows' garden - Buffet/finger foods | Service Station |
| Pelican Bar | Please speak to Duty Staff |


| Venue - Leckhampton - | Location of Allergy Data <br> Sheets |
| :--- | :--- |
| Leckhampton Cafeteria | Leckhampton Servery |
| Leckhampton Sit Down | Please speak to Duty Butler |
| Leckhampton Garden, Warden's Meeting Room, Bar, Music <br> Room | Service Station |

Appendix 8.

Event Allergen Identification Sheet


## Appendix 9.

## Emergency Response Procedure

## Actions in the event of someone suffering a severe allergic reaction

Immediate action is vital.

- If an allergic person becomes ill, it is likely that person - or someone with them - will state that they are suffering an allergic reaction. They may use the word:


## "ANAPHYLAXIS"

- As soon as a severe reaction is suspected an adrenaline injection must be administered. The person should remain as still as possible. Ideally, they should be lying down and if they are feeling weak, dizzy, or appear pale and sweating, their legs should be raised. Sometimes an Adrenaline auto-injector(AAI) is referred to by their brand names: EpiPen, Jext; Emerade or Anapen.
- Immediately send someone to dial 999 giving the following information: "This is an emergency. A customer has collapsed and we believe they are suffering from anaphylaxis". (Pronounced Ana-fill-axis).
- Speak clearly so that the ambulance crew will know exactly where to come.
- The College's main sites are:

| Old House | Leckhampton House |
| :--- | :--- |
| Trumpington Street | 37 Grange Road |
| CB2 1RH | CB3 9BJ |

- The Lodge should be contacted immediately after the 999 phone call. The contact number for the Porters Lodge is 38000 . The Porters will stand at the College entrance to direct the ambulance crew to the patient.
- Request the assistance of a First Aider until the ambulance crew arrive
- Make a note of the time adrenaline was given. If there is no improvement, a second dose can be given after 5 minutes.
- Keep calm and make the patient feel comfortable.

All staff trained in First Aid will know what to do if someone suffers from anaphylaxis.
Note: Severe reactions can take place within a few minutes and in very extreme cases where prompt treatment is not sought - can be fatal.

## If a protocol is in place for the person then this will be followed.

## Known allergy sufferers are asked to carry their auto-injection device clearly to hand at all times whilst dining in College.

## Appendix 10.

## Location of Allergen Warning Signs

1. Porters Lodge
2. C Passage Notice Board
3. Entry to Hall Stairs
4. Pelican Bar Notice Board
5. McCrum Foyer
6. Leckhampton House - Entry Lobby
7. Leckhampton House - Servery Entry

## Allergies

Some of our menu items contain nuts, seeds and other allergens

There is a small risk that tiny traces of these may be in any other dish or food served here. We understand the dangers to those with severe allergies.

Please speak to a member of staff for details of known Allergens in our Food

## Appendix 11.

## Allergen Labelling Flow Chart

Allergen Labelling Documentation Flow Chart


Step 2 - Preparation
All homemade products and dishes will have their own 'Passport' that will list all ingredients and highlight any of the known Allergens from the current list.

This document will be filled alphabetically in folders kept by the survery.
To be completed by the chefs.


Step 4 - High Table Lunch Service


Step 6 - Leckhampton
All bar meals and snacks will use the All dishes available for Formal Dinners will have a note on the form from step 4 to highlight all known allergens contained with each dish.
This form will be displayed next to the Hot Counter during service and then filed in a folder within the office.

```
To be completed by the
```

Leckhampton Chef.

## Appendix 12.

## Dietary Card Example



## Appendix 13.

## PPDS Label Example

[^0]
[^0]:    YOGHURT-TOPPED APRICOT FLAPJACKS
    INGREDIENTS: Oats, Bramley Apples (20\%), Pure Vegetable Margarine (made using Certified Sustainable Palm Oil), Yoghurt Topping (13\%) (Contains natural emulsifier - Soya Lecithin, Wheat Flour), Soft Light Brown Sugar, Golden Syrup, Blackcurrants (6\%), Sunflower Oil.
    made in an environment where nuts are used

