



Allergens Policy

(Reviewed by the Anaphylaxis Campaign)

Legislative Updates 2025

1. Expanded Guidance on PPDS Foods

Schools must now ensure allergen information is clearly labelled on Prepacked for Direct Sale (PPDS) items (e.g. sandwiches made and packaged on-site). This is part of the implementation of Natasha's Law, which became enforceable in October 2021 and continues to evolve.

2. Updated Food Standards Agency (FSA) Guidance

The March 2025 update includes clearer labelling requirements for non-prepacked foods, emphasis on staff training and use of allergen checklists, and reinforcement of the 14 mandatory allergens and how they must be declared.

3. Benedict's Law – Proposed Legislation

Introduced in July 2025 following a tragic incident, this bill aims to mandate allergy action plans for every pupil with a known allergy, require adrenaline auto-injectors to be available in all schools, and enforce staff training in recognising and responding to allergic reactions.

Policy Version Control

Date	Version	Amendments/Comments	Reviewer/s
April 2025	25 v7	Updated FSA guidance	JPI
June 2026	26 v8	Benedicts Law	JPI

Allergens Policy

1 Policy Statement

- 1.1 The Constellation Trust is aware that children may have allergies, which can cause allergic reactions and childhood allergy is now a recognised problem for children and parents/carers across the country. Having allergies has the potential to be a debilitating condition and 5-8% of children in the UK have a food allergy. Following this policy will ensure, where possible, allergic reactions are prevented, and staff are fully aware of how to support a child who may be having an allergic reaction. Information passed from parents/carers from the registration form regarding allergic reactions and allergies must be shared with all staff in the school.
- 1.2 It is a legal requirement (Food Information Regulations 2014) for all food business to provide information about allergenic ingredients used in food sold or provided by them. 'Natasha's Law' will come into force in October 2021, giving businesses a transition period to prepare for the new rules. The Food Standards Agency has published updated technical guidance¹ for industry to help ensure that businesses of all sizes can prepare and adapt to these changes. Section 100 of the Children and Families Act 2014, states schools have a duty to support pupils at their school with medical conditions. Individual Health Care Plans are developed in partnership between the school, parents/carers, pupils, and the relevant healthcare professional who can advise on a child's case. The aim is to ensure that schools know how to support your child effectively and to provide clarity about what needs to be done, when and by whom. The Trust recognises that although some allergies and intolerances produce symptoms that are uncomfortable, some people can suffer severe allergic reactions. This is known as anaphylaxis and in some cases, this can be life threatening. The Trust also recognises that it has a duty of care to safeguard all its students, staff and visitors from adverse reactions due to food or other allergen hypersensitivities.

2 What is the definition of an allergy?

- 2.1 This is when the body has a reaction to protein (e.g. foods, insect stings, pollens) or other substance (e.g. antibiotic). These substances are called allergens, and for most people they are harmless. Common things that children are allergic to include food (e.g. peanuts, tree nuts, milk, eggs, wheat and fish), pollens from tree and grasses, house dust mite and insect stings.
- 2.2 Allergic symptoms can affect the nose, throat, ears, eyes, airways, digestion and skin in mild, moderate or severe form. Symptoms of allergy affect many children on a daily basis and can impact on a child's health/well-being and can go undiagnosed for some time.

¹ Food Standards Agency: Guidance on Allergen Management and Consumer Information

- 2.3 The consequences of suffering with one, or several allergies can cause issues with reduced sleep, concentration and anxiety that can affect learning.
- 2.4 When a child first presents with an allergy it is not always clear what has caused the symptoms, or even if they have had an allergic reaction, since some allergic symptoms can be similar to other childhood conditions. However, if the allergic reaction is severe, or if the symptoms continue to re-occur, it is imperative that their symptoms are investigated. With early diagnosis and treatment, it is easier to manage symptoms and reduce the effects on a child's daily life.

3 What can go wrong

- 3.1 Allergen contamination of foods.
- 3.2 Incorrect or insufficient labelling of food products.
- 3.3 Allergic reaction or anaphylactic shock to child, visitor or staff member.
- 3.4 Adding your 'own' additional allergenic ingredients to a ready-made product and not communicating this.
- 3.5 Purchasing foods/ingredients from unapproved suppliers.

4 Our Safe Methods

- 4.1 Working closely with approved suppliers that provide information on which foods could contain allergens.
- 4.2 Pupils with severe food allergies/intolerances (anaphylaxis) will be served by senior members of the catering team.
- 4.3 Following **only** the Trust approved and risk assessed menus and only using approved/nominated suppliers.
- 4.4 To use recipe management software and interactive digital menus allowing filtering for allergens.
- 4.5 Take advice and instruction from the local Environmental Health Officer (EHO), Trading Standards and updated catering policies to reflect changes in legislation.
- 4.6 Display notices informing pupils/staff that certain products contain allergens, and that additional advice is available (or ensure this information is included in the menus).
- 4.7 Adapt a whole school approach with how to deal with an anaphylactic shock
- 4.8 If a pupil has a diagnosed allergy/intolerance:

- Use the Allergy Risk Assessment Flow Chart to ensure the correct procedures are being followed.
 - Always adhere to the Trust Catering menus and approved ingredients. Also, check ingredients/retain all original packaging.
- 4.9 Never give inaccurate advice about foods containing allergens. If you are not sure, say so.

5 Due Diligence

- 5.1 Make regular checks and record.
- 5.2 Follow the 'what to do if a child has an anaphylactic shock', when deemed necessary.
- 5.3 Follow up any incidents or alleged incidents by informing the Head of Trust Catering Services and the Chief Operating Officer who will advise you on the most appropriate course of action.

6 Be Alert! Food Allergy Can Kill

- 6.1 Certain people can have an allergy to almost any protein containing food. Some allergies are common but it is not in most foods. The allergic reaction can vary in severity from a mild rash to a condition requiring urgent medical assistance.
- 6.2 The Food Standards Agency has currently identified 14 most common allergens, these are listed (Appendix 1):

7 What you need to do

7.1 Food Handling:

- 7.1.1 Avoid cross contamination between foods.
- 7.1.2 Use separate and distinctive (Purple) coloured storage containers, utensils, chopping/food preparation boards during the preparation and handling of such foods.
- 7.1.3 Thoroughly clean and sanitise food contact surfaces, equipment and utensils before each use.
- 7.1.4 Avoid cross contamination by storing allergen free foods above allergenic foods (dry store, fridge/freezer etc.)
- 7.1.5 Wash your hands after handling allergens.

7.2 Consumer Enquiries/Complaints

- 7.2.1 If a consumer (pupil, visitor, staff members etc.) asks you about food ingredients do not mislead them; answer all enquiries with care and understanding.

- 7.2.2 Always refers to the label on the product, in conduction with the product specification sheets.
- 7.2.3 If you still cannot be sure about ingredients, say so; **don't guess.**
- 7.2.4 If necessary, ask your manager for advice.
- 7.2.5 In all instances the Chief Operating Officer and Head of Trust Catering Services must be informed of any accidents, near misses or complaints involving staff, students and visitors. This must be reported (within 24 hrs) in writing, using an accident report form. The completed form should be returned to the Trust Office.
- 7.3 **Allergic Reactions:**
 - 7.3.1 If an allergic child or staff member becomes ill or you suspect, they may be suffering from an allergic reaction you should immediately summon assistance.
 - 7.3.2 For persons known to have allergies any delay in treatment may be critical.
 - 7.3.3 The nominated First Aider maybe required to administer medication or use an Adrenalin Auto Injector (EpiPen) or JEXT (the medicine a child has been given by a doctor to help treat their anaphylaxis). Please refer to the Medication Policy and the General Health & Safety Guidance Policy.
 - 7.3.4 Advice on best practice is that all catering/support staff should receive training in the use of adrenalin. **In the event of an emergency any lay person can administer adrenalin for the purposes of saving a Human Life in accordance with the Medicines Act 2012.**
 - 7.3.5 Always keep the casualty calm and never leave them alone.
 - 7.3.6 Never move a casualty that you suspect is having a severe allergic reaction – always bring help to them.

Appendix 1

THE 14 MAJOR FOOD ALLERGENS

Celery

This includes celery stalks, leaves, seeds and roots. Celery is usually found in celery salt, salads, some meat products, soups and stock cubes.



Cereals Containing Gluten

Wheat, rye, barley and oats are often found in foods containing flour, some baking powder, batter, breadcrumbs, cakes, couscous, meat products, pasta, pastry, sauces, soups and some fried food.



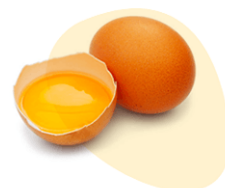
Crustaceans

Crabs, lobster, prawns and scampi are crustaceans. Shrimp paste is an allergen in this category that is commonly used in Thai and Southeast Asian cooking.



Eggs

Eggs are found in cakes, some meat products, mayonnaise, mousses, pasta, quiche, sauces and pastries. Some food products are glazed with eggs during or before cooking.



Fish

You may find fish sauces in pizzas, relishes, salad dressings, stock cubes and Worcestershire sauce.



Lupin

Lupin is a flower, but it is also sometimes found in flour and sometimes used in bread, pastries and pasta.



Milk

Milk is found in dairy products such as butter, cheese, cream, milk powders and yoghurt. Some foods are also glazed with milk during or before cooking. Milk is also commonly found in powdered soups and sauces.



Molluscs

Molluscs include mussels, land snails, squid and whelks, and can also be found in oyster sauce - which is commonly used in fish stews.



Mustard

This includes Mustard in the form of powder, liquid and seeds. This ingredient is used in bread, curry, marinades, meat products, salad dressings, sauces and soups.



Nuts (Tree nuts)

Nuts (excluding Peanuts) refer to nuts that are grown on trees; unlike peanuts, which are grown underground. This includes cashew nuts, almonds and hazelnuts.

**Peanuts**

Peanuts are often used as an ingredient in biscuits, cakes, curries, desserts, sauces, groundnut oil and peanut flour.

**Sesame**

Sesame seeds are found commonly in bread, usually sprinkled on buns such as hamburger buns, bread sticks, and are also used to make hummus, sesame oil and tahini.

**Soya**

Soya is found in bean curd, edamame beans, miso pates, textured soya protein, soya flour or tofu, and is a staple ingredient in oriental food. It can also be found in desserts, ice cream, meat products, sauces and vegetarian products.

**Sulphur Dioxide (Sulphites)**

This is an ingredient often used in dried fruits and in some meat products, soft drinks, vegetables, wine and beer. Asthmatics have a higher risk of developing an allergy to sulphites.



Appendix 2

Trust Catering Ordering Process

Please be aware that the items are not ordered until all stages listed below have taken place.

Step 1

In the first instance a request is made to the I/C of the kitchen to establish if ingredients/rewards incentives/confectionary etc. can be sourced through Allmanhall's - Trust Catering Approved Buying List (ABL).



Step 2

If the items requested are not listed on the ABL please contact the Trust Head of Catering with a list of the items required. The HoC will check the feasibility of requests, ensure the prices are correct and ingredients/rewards incentives/confectionary etc. are appropriate for a school setting. If deemed suitable/appropriate items will be added to the ABL and/or if required to do sourced from an Allmanhall confectionary wholesaler.



Step 3

In line with the Trusts Safeguarding/Food Safety Policy/Guidance from the Anaphylaxis Campaign, ingredients/rewards incentives/confectionary etc. **must** be checked for - Allergens/Severe Food Intolerances and Specialist Diets. Once checked/approved by the Trust Head of Catering the nutritional data will be uploaded to [Kafoodle](#) (the Trusts Food Safety menu/ingredients compliance software).



Step 4

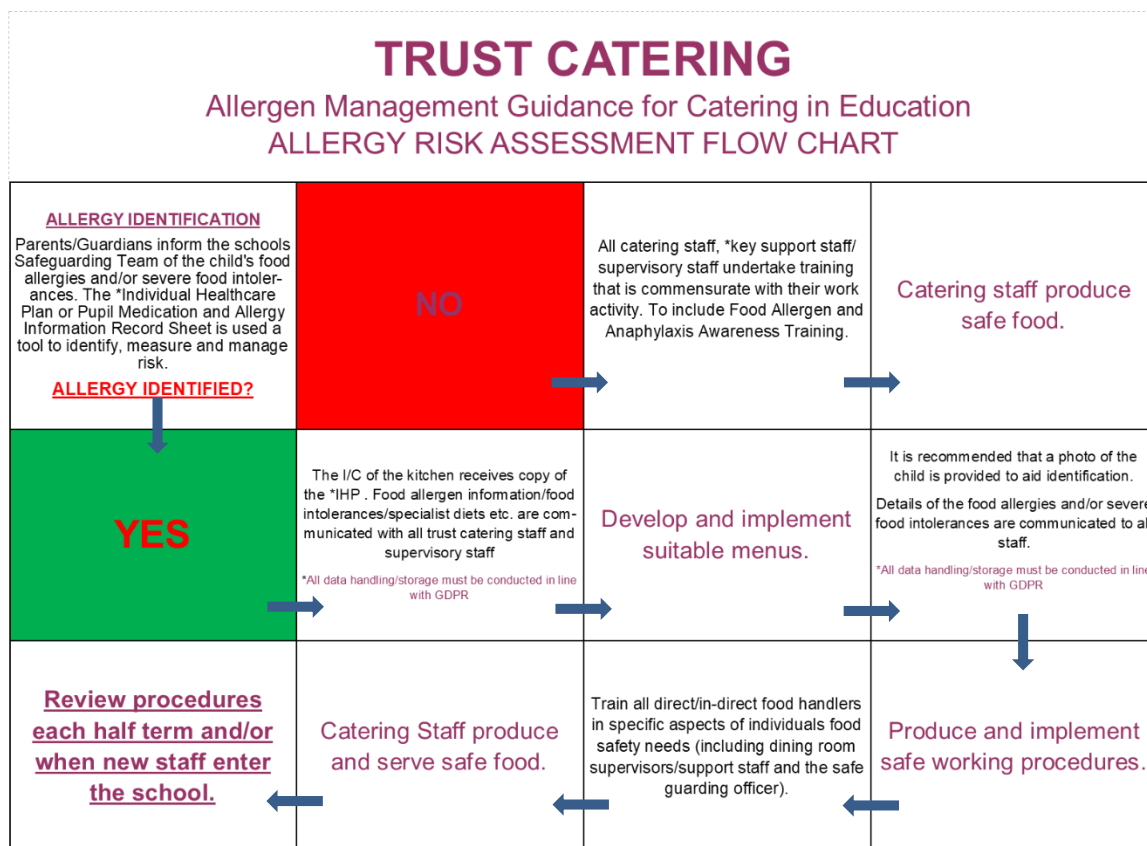
Approved ingredients/rewards incentives/confectionary etc. can be requested from the Trust Head of Catering in conjunction with the Trust Financial Procedures

The above steps may take SEVERAL WORKING DAYS to complete, please ensure adequate time is allowed for this process.

Important

If the budget holder purchases goods independently (not through Trust Catering), the legal responsibility e.g. Declarations of allergens, checking ingredient specifications/traceability and recall systems would transfer back to the person who requested/approved the goods.

Appendix 3



14 Allergens



The way allergens are labelled on prepacked foods has changed. The Food Information Regulation, which came into force in December 2014, introduced a requirement that food businesses must provide information about the allergenic ingredients used in any food they sell or provide.

There are 14 major allergens which need to be mentioned (either on a label or through provided information such as menus) when they are used as ingredients in a food. Here are the allergens, and some examples of where they can be found:

1 Celery This includes celery stalks, leaves, seeds and the root called celeriac. You can find celery in celery salt, salads, some meat products, soups and stock cubes.	2 Cereals containing gluten Wheat (such as spelt and Khorasan wheat/Kamut), rye, barley and oats is often found in foods containing flour, such as some types of baking powder, batter, breadcrumbs, bread, cakes, couscous, meat products, pasta, pastry, sauces, soups and fried foods which are dusted with flour.	3 Crustaceans Crabs, lobster, prawns and scampi are crustaceans. Shrimp paste, often used in Thai and south-east Asian curries or salads, is an ingredient to look out for.	4 Eggs Eggs are often found in cakes, some meat products, mayonnaise, mousses, pasta, quiche, sauces and pastries or foods brushed or glazed with egg.	5 Fish You will find this in some fish sauces, pizzas, relishes, salad dressings, stock cubes and Worcestershire sauce.	6 Lupin Yes, lupin is a flower, but it's also found in flour! Lupin flour and seeds can be used in some types of bread, pastries and even in pasta.	7 Milk Milk is a common ingredient in butter, cheese, cream, milk powders and yoghurt. It can also be found in foods brushed or glazed with milk, and in powdered soups and sauces.	8 Molluscs These include mussels, land snails, squid and whelks, but can also be commonly found in oyster sauce or as an ingredient in fish steaks	9 Mustard Liquid mustard, mustard powder and mustard seeds fall into this category. This ingredient can also be found in breads, curries, marinades, meat products, salad dressings, sauces and soups.	10 Nuts Not to be mistaken with peanuts (which are actually a legume and grow underground), this ingredient refers to nuts which grow on trees, like cashew nuts, almonds and hazelnuts. You can find nuts in breads, biscuits, crackers, desserts, nut powders (often used in Asian curries), stir-fried dishes, ice cream, marzipan (almond paste), nut oils and sauces.	11 Peanuts Peanuts are actually a legume and grow underground, which is why it's sometimes called a groundnut. Peanuts are often used as an ingredient in biscuits, cakes, curries, desserts, sauces (such as satay sauce), as well as in groundnut oil and peanut flour.	12 Sesame seeds These seeds can often be found in bread (sprinkled on hamburger buns for example), breadsticks, houmous, sesame oil and tahini. They are sometimes toasted and used in salads.	13 Soya Often found in bean curd, edamame beans, miso paste, textured soya protein, soya flour or tofu, soya is a staple ingredient in oriental food. It can also be found in desserts, ice cream, meat products, sauces and vegetarian products.	14 Sulphur dioxide (sometimes known as sulphites) This is an ingredient often used in dried fruit such as raisins, dried apricots and prunes. You might also find it in meat products, soft drinks, vegetables as well as in wine and beer. If you have asthma, you have a higher risk of developing a reaction to sulphur dioxide.
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Appendix 4

TRUST CATERING

Individual Dietary Information Notice



[Insert Image Here]	Food Allergies and/or <u>Severe</u> Food Intolerances: NUTS, KVM FRUIT <u>Severe</u> Food Intolerances: - will not cause anaphylaxis so better to separate intolerances out
	Food Intolerances: LACTOSE INTOLERANT
	Food Dislikes: SPICY FOOD
	Specialist Diets: (Halal, Kosher, Gluten Free, Vegetarian, Vegan) HALAL
Joe Bloggs	

Identifying and Supporting Primary School Pupils with Anaphylaxis and/or severe food allergies and/or intolerances

In addition to Individual Health Care Plan (IHCP) there is now a standardised Trust wide approach and process for identifying pupils with severe food allergies/intolerance. A lanyard and food alert card will be issued (from Sirius Academy West); to all primary school pupils with most serious (anaphylaxes) and potentially life-threatening food allergies/intolerances*.

SENDCO's will need to send a list of applicable pupils to the admin office at SAW for cards to be printed and distributed. This will be an ongoing process, subject to the movement into the schools and changes to the IHCP.

Pupils with severe food allergies/intolerances (anaphylaxis) will be served by senior/experienced members of the catering team.

Parents/guardians will need to be 'sign posted' to the Kafoodle Interactive Schools Menus (located on the school's website). These menus have additional provision for pre-ordered specialist diets – these menus include the option to filter for all the 14 UK food allergens.

Lanyards/medical alert cards are being introduced to further enhance the robust procedure for identify pupils with anaphylaxis. Under this new Trust wide approach to allergen management; the GDPR compliant lanyards worn by pupils will include the pupils name and relevant allergy information.

The Trust will work in collaboration with parents/guardians to safeguard pupils with medical conditions. However, if there are parents/guardians who are insistent that they **do not want** their child to be issued with a lanyard and food alert card. Where this is the case, parents should contact the Head of School so that we can record and document that not adopting this Trust wide approach could potentially compromise the safety of pupils with anaphylaxis.

**Where a School is notified by the parent or other agencies involved with the pupil that the pupil may have a serious allergen/anaphylaxis, despite not having access to a EPI-Pen, the school may wish to include these pupils within the cohort that receives a lanyard.*

Appendix 6

Whole School - Severe Allergy & Anaphylaxis Checklist

School Protocols

- ☐ Obtain specialist dietary (allergen) requirements from the Individual Health Care Plan (IHCP)
- ☐ Submit the required information to Sirius Academy West admin for creating food alert lanyard.
- ☐ Update specialist dietary (allergen) requirements when pupils move schools or IHCP changes
- ☐ Signposts parents/guardians to the Kafoodle (customer facing) Interactive Menus
- ☐ Ensure office staff are familiar with and have access to the Kafoodle (back office) software
- ☐ Enable a pre-order process for specialist diets
- ☐ If parent opts out of the food alert lanyard, Head of School documents decision
- ☐ Note potential safety compromise

Catering Protocols

- ☐ Only trained/experienced members of catering team will serve pupils with severe allergies/specialist diets.
- ☐ Cross reference, double check ingredients against Kafoodle meals plans, Approved Buying Lists (ABL's) and finally checking the ingredients when taking receipt of deliveries.
- ☐ Follow strict allergen-safe food preparation procedures:
 - **Preparation:** Use protective personal equipment (PPE) – disposable plastic aprons and purple chopping boards in dedicated separate clean/santised area. Ensure cooking equipment and utensils for allergen-free meals and cleaned/santised before and after use.
 - **Storage:** Use purple lidded airtight food storage containers and ensure adequate appropriate storage to avoid cross contamination.
 - **Meal Service:** Do not use the same utensils for different dishes. Pre-order/specialist diet meals must be pre-plated before (if required covered) and for pupils with severe food allergies/intolerance these meals are served on a **purple tray**.
 - **Food Ingredients:** Clearly label all food items with allergen information
 - **Training:** All catering staff are to undertake annual refresher food hygiene training.

Appendix 9 – How Benedict’s Law Affects School Policies

Benedict’s Law introduces mandatory statutory guidance for schools on allergy management. Schools must implement comprehensive allergy and anaphylaxis policies, ensure all staff receive training, stock spare emergency adrenaline auto-injectors, and maintain Individual Healthcare Plans and Allergy Action Plans for pupils with known allergies. Schools are also required to strengthen incident reporting, prevention measures, and administrative processes to ensure consistent and safe allergy management across all settings.