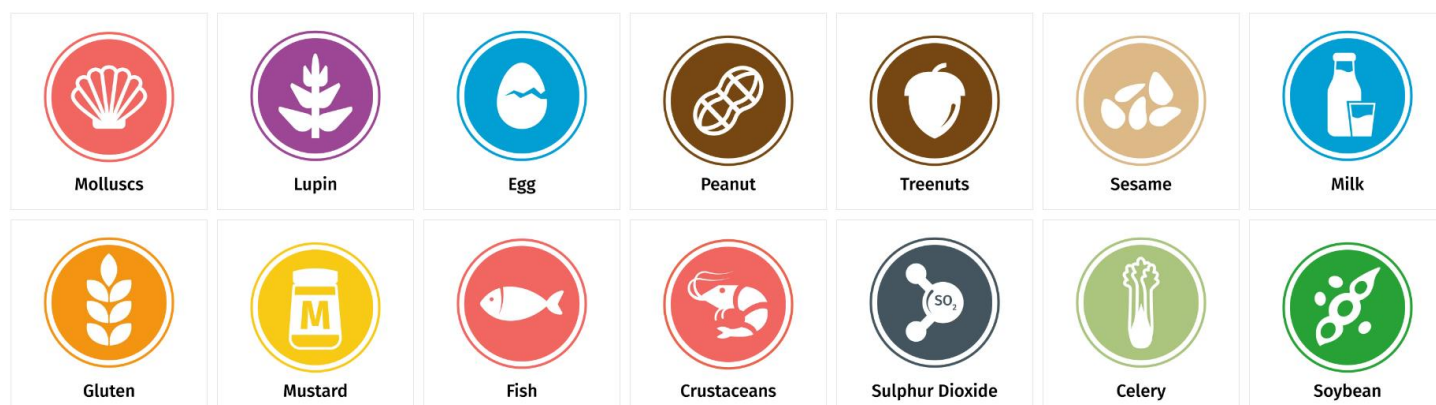


BBfA Allergen Safety Pack 2025

Guidance and best practice for businesses.



More information and an editable version of this pack is available via
bbfa@hertfordshire.gov.uk



Better Business for All

*A local partnership between Businesses and
Regulatory Services to promote growth*

1. Introduction

Food Allergens

What is a food allergy?

A food allergy is where your immune system reacts to certain foods, an allergic reaction is when body's immune system reacts unusually to components in foods, usually specific proteins. Symptoms include tingling in the mouth, itchy skin rash, swelling of the face or mouth, shortness of breath, nausea, abdominal pain and diarrhoea. Some people may develop anaphylaxis which may lead to a severe or even life-threatening reaction, where symptoms may additionally include vomiting, breathing difficulties and a dramatic fall in blood pressure leading to unconsciousness and even death.

The 14 Food Allergens

In the UK, food businesses must inform customers under food law if they use any of the 14 allergens as ingredients in the food and drink they supply. This includes brought in condiments/sauces etc.

Note: these are the 14 allergens referred in UK law but there are other allergens which are less common, so take care when customers make you aware of their particular allergies.

Name	Description
Celery	This includes celery stalks, leaves, spice and celery salt. It is often found in salads, some meat products, soups and stock cubes. People with a celery allergy also need to avoid celeriac, as they are varieties of the same species.
Cereals containing gluten	Gluten is the name of a family of proteins found in wheat, barley, rye and oats. It is often found in foods containing flour and therefore bread, baked goods, cereals and pasta. It can also be found in barley-based products such as beer, malt, malt vinegar and food colouring.
Crustaceans	These include crabs, lobsters, prawns, crabs and scampi. They are often found in shrimp paste used for curries.
Eggs	These are often found in cakes, some meat products, mayonnaise, mousses, pasta, quiche and food brushed with egg.
Fish	Often found in fish sauces, pizzas, relishes, salad dressings and stock cubes. Fish and shellfish allergies are one of the most common allergies in adults, and can develop at any point in life with no previous symptoms experienced when eating fish.
Lupin	This includes lupin seeds and flour and can be found in some types of bread, pastries and pasta.
Milk	This is found in butter, cheese, cream, milk powders, yoghurt and foods glazed with milk. Milk and milk powder can be used as coatings i.e. on chicken and chips.
Molluscs	These include mussels, land snails, squid, oysters and whelks. They are often found in oyster sauce or as an ingredient in fish stews.
Mustard	This includes mustard powder, liquid mustard and mustard seeds. It is often found in breads, curries, marinades, meat products, salad dressing, sauces and soups.

Peanuts	Also known as Groundnuts, monkey nuts, arachide, arachis oil, beer nuts, cacahuete, earth nuts, goober nuts/peas, mondalona nuts. These can be found in biscuits, cakes, curries, desserts and sauces.
Tree nuts	These include almonds, hazelnuts, walnuts, cashews, pecan nuts, Brazil nuts, pistachio nuts, macadamia or Queensland nuts. They can be found in breads, biscuits, crackers, desserts, ice cream, marzipan, nut oils and sauces. Ground, crushed or flaked almonds are often used in Asian cooking.
Sesame	These can be found in bread, bread sticks, as a garnish, in hummus, sesame oil and tahini (sesame paste).
Soybeans	This can be found in bean curd, edamame seeds, miso paste, soya protein, soya flour, tofu and a very wide range of processed foods. It is often used in some desserts, ice cream, meat products, sauces and in vegetarian products.
Sulphur dioxide	Sulphites are preservatives, used in dried fruit, meat products and vegetables as well as in wine and beer. Sulphur dioxide allergy is rare however sulphites can cause allergy-like symptoms in people with underlying conditions such as asthma.

Disclaimers and the use of a 'May contain ...' statement. Also known as precautionary allergen labelling and statements.

Use of a 'may contain....' statement, or similar, to indicate that the product may contain an allergen as a result of possible cross-contamination, must not take the place of good manufacturing practices (GMPs) in a food business.

These phrases should only be used if in despite of the businesses best endeavours there remains a genuine risk of cross contamination. Businesses should avoid using blanket statements as an attempt to limit their liability. Businesses should undertake risk assessment to understand the cross contamination risk and label appropriately.

The FSA guidance on precautionary statements is available here: www.food.gov.uk/business-guidance/precautionary-allergen-labelling-checklist

Failure to comply with allergen requirements constitutes criminal offences, which could subject your businesses to prosecution.

Directors are liable for ensuring compliance within the business and are responsible for the actions of their staff.

In severe cases, negligence can lead to charges of manslaughter.

It is important to get it right. You do not want your business to hurt someone.



2. What is it like living with an allergy?

Every day is a worry. People who have an allergy have to be vigilant about everything they eat, it's exhausting.

Parents who have children that have an allergy face an enormous task every day to ensure that their child is not exposed to the allergen, and they must be prepared to act if something does go wrong.

It is important to understand why people are asking about the ingredients in their food and why it is so important to get it right.

Allergy UK have lots more information about what its like living with an allergy

www.allergyuk.org/living-with-an-allergy

I was diagnosed with food allergies when I was a child. Living with an allergy to certain foods is really hard. I am constantly having to be aware and vigilant about what I am eating.

Lots of things that people take for granted, such as being able to celebrate a birthday with a meal out, or grabbing something to eat quickly requires so much more planning for me. I can't just live in the moment and enjoy social activities in the same way that other people can.

Not only this, I also have to be prepared to treat an allergic reaction. Sometimes these are mild, but I know in the worst case I could suffer a life-threatening reaction which really scares me.

It is so important that businesses have good controls over the allergenic ingredients they handle. The more accurate the information they can provide, then the more informed my decision can be.

- Hertfordshire resident who lives with an allergy.

3. Controlling allergen cross contamination

Allergen cross-contamination can happen unintentionally when there is a risk that the allergen has entered the product accidentally during the production process. This can sometimes happen when several food products are made on the same premises. Many food safety controls in place for other risks are also effective for food allergens.

Allergen segregation is possible by:

- Effective cleaning, washing up and hand washing using hot water, cleaning and sanitising products.
- Physical separation – putting a lid or cover on food, using a clean knife, board, plate, pan, working area, aprons.
- Using separate fryers/cooking equipment/tongs.
- Checking that packaging is clean and allergen spillage carefully managed.
- Careful management of dishwashing equipment – correct temperatures, products and cleaning.



4. Allergen information and labelling

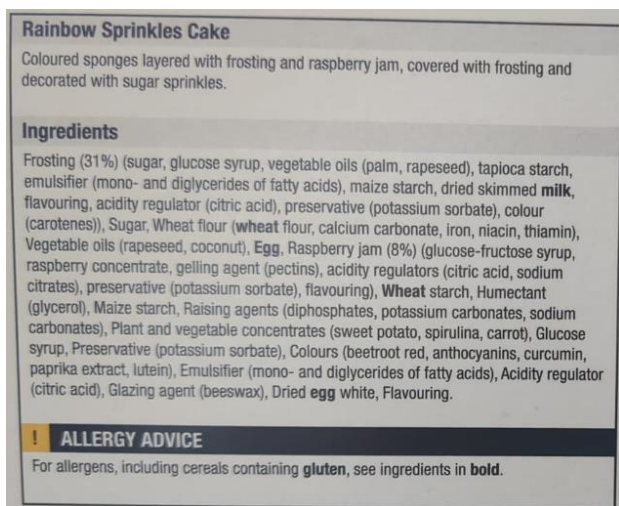
Different types of food have different allergen labelling requirements, and this depends on how the items are packed and provided to customers. There are three ways foods can be presented to consumers, these are:

4.1 Prepacked

Prepacked foods are packed prior to being displayed for sale. The packaging is fully, or partly enclosed and cannot be altered without opening or changing the packaging.

If the product contains any of the 14 allergens that are required to be declared as ingredients by law. These ingredients must be highlighted/emphasised on the packaging, commonly allergens are highlighted in **bold** on the ingredients list.

Wider labelling advice is available from the FSA here: www.food.gov.uk/business-guidance/packaging-and-labelling

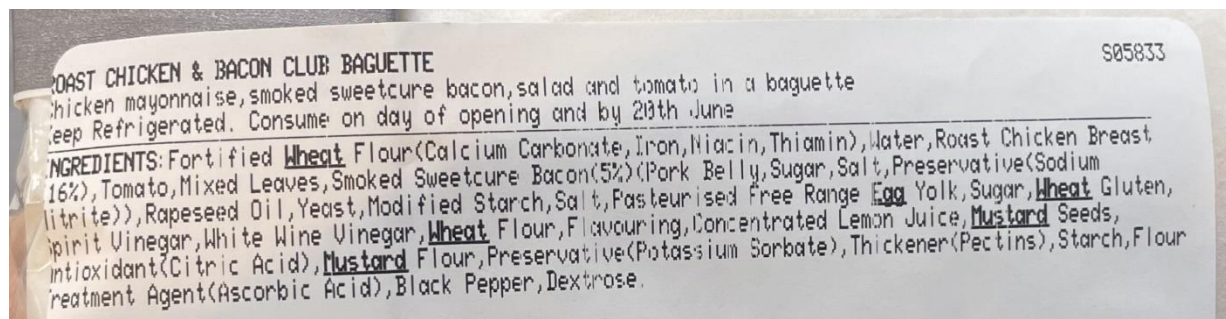


4.2 Prepacked for Direct Sale

Since Natasha's Law was introduced in 2021, it is a legal requirement for 'pre-packed for direct sale' items to be labelled and include the name of the food, an ingredients list and any of the 14 allergens emphasised in the ingredients list.

Prepacked for direct sale or PPDS is food that is packaged at the same place it is offered or sold to consumers and is in this packaging before it is ordered or selected. These are food stuffs you bag or package up yourself in advance of any customer order for example: sweets, sandwiches and packets of doughnuts. These products need to be supplied with a full ingredients list.

For prepacked for direct sale food the allergen information must be given within the ingredients list. The information should be emphasised in some manner, commonly **bold** font can be used and you should use the legal name of the allergen (as above). E.g. pistachio (**nut**), prawns (**crustacean**).



Not sure you understand the difference between prepacked and non-prepacked packaging? The table below gives some examples:

Prepacked	Non-prepacked
Cake presented in a bag that is folded over or has the corners twisted to hold it closed	Cake presented in an open bag
Filled baguette presented in a box with a closed lid	Filled baguette presented in a box with an open lid

4.3 Loose (aka not prepacked or prepacked for direct sale)

This item of food isn't in any packaging until you put them into bags or containers at the request of the customer for example, food prepared by a takeaways or things like ice-creams or sausage rolls on a hot counter. Any food that is sold or displayed without packaging.

Allergen information can be supplied on the menu, chalk boards, tickets or provided face-to-face. If provided in this way, make it clear that the information can be obtained by asking a member of staff by means of a notice, statement on the menu, ticket or label that can easily be seen by customers, as well as in other formats made available to the consumer e.g. on website, on an events booking form providing the customer has been made aware that the information is available. The notice must be clear and conspicuous, not hidden away and easily visible and legible. It is also best practice for staff to ask customers if they have any allergies when taking the orders and recording this on the order ticket or system.

For takeaways, the mandatory allergen information must be made available at point of order and delivery. Allergen information must be specific to the food, complete and accurate. Inaccurate or incomplete information about allergenic ingredients used in foods sold non-pre-packed (or prepacked for direct sale) would be a breach of the regulations and could result in penalties.

Be careful when making vegan claims, as some consumers may assume that these dishes are free from animal based allergens, if you make **vegan** claims you should be clear about any cross contamination concerns and the risks associated

Still not sure what category your product falls into?

Follow this example: Your business is a coffee shop and you sell cheese and tomato sandwiches.

Scenario 1 - You buy sandwiches from a third party, already in their packaging for customers – these are prepacked.

Scenario 2 - Your staff make the sandwiches ahead of the lunch rush, put them in bags that are not sealed – these are pre-packed for direct sale.

Scenario 3 - A customer orders a sandwich, it is made there and then – this is a loose food item.

5. Nature Substance and Quality – the corner stones of food legislation.

Under the [Food Safety Act 1990](#) all food supplied to a business or consumer must be of the nature, substance and quality of that deemed by the end user. Examples of what constitutes 'nature', 'substance', and 'quality' are -

What is meant by nature, substance and quality?

"Nature" covers a product sold as one thing, but which is in fact another, e.g. haddock sold as cod;

"Substance" covers situations where the food contains foreign bodies (e.g. an insect) or damaging residues or where there is a statutory or other standard for a food and the substance falls below it, for example milk powder with below the minimum milk protein level. The necessary substance for particular products is set through compositional standards in commodity regulations for which separate guidance exists;

Substance also includes where a customer has demanded that the food is free from a specific ingredient.

"Quality" covers commercial quality, having regard to any statutory standards of composition in the food, so an example of food which would not be of the quality demanded would be a stale cake.

6. Menus & Signage

Below sets out best practice actions businesses can take to reduce the likelihood of an allergen incident.

Separate menus for different allergen groups, such as a gluten free menu.

When changing menus or ingredients, make sure all staff are aware and a system is in place if new allergens are introduced into food items they were not in before. Check existing orders for allergies and ensure all staff know about the change. An example of where this can happen is when you run out of almond oil and need to replace it with peanut oil. Make sure you discuss the use of approved suppliers and products to ensure allergen info remains correct.

Written information should be readily available without the consumer having to ask. If a consumer does need to ask signage should have wording similar to, "if you require information regarding the allergens in our dishes please speak to a member of staff"

You can provide allergen information verbally. If you do so, you must place a notice on display that instructs customers to speak to a member of staff if they require allergen information - for example, 'Allergies and intolerance: please speak to a member of staff if you require information about our ingredients'. The [notice](#) must be visible to customers where they place their order and, as above, if they can place their order from multiple locations, the signposting must be displayed at each one.

Businesses should identify the allergens in each separate component of a dish as opposed to the dish as a whole ie which allergens are in the sausages, which are in mash and gravy etc.

Allergen information can be in words/symbols and businesses can choose to provide the info via hard copy or digitally. If available digitally a hard copy must be available for those who cannot access online content.

Keep records that staff have been told about changes of ingredients that will affect the menu during that service. This could be a list of staff at a morning meeting and then a list of staff that are in at later times of the day and a reminder to inform them of the changes.

7. Storage

Keep allergenic ingredients separate to other ingredients, ensure they are not kept above plates, cookware or anything else that would compromise an order that has been requested free from a specific allergenic ingredient.

If items lose their labels – don't risk using the wrong ingredients, bin them.

Do not store allergenic ingredients under other ingredients where falling product could cause contamination

8. Training

Ensure all staff are appropriately trained. This includes, those taking the orders, the kitchen, the servers and anyone who might occasionally be involved in the food delivery such as bar staff.

The Food Standards Agency provides free online allergy training which you can access here:

<https://allergytraining.food.gov.uk/>.

It is important to train your staff regarding your own procedures and policies for dealing with consumers with allergies. Don't just rely on third party training. The system that you implement will be specific to your own business and therefore you should train your staff on what is expected of them. It is not enough for staff to know what the 14 allergens are, they must also know your businesses specific allergen management control measures and what their responsibilities are.

Keep records of staff training internally and externally that specifically mention any allergen information provided to staff. You also need to check that the training has been understood, for example by introducing a quiz or by undertaking secret shopping or spot checks on staff members.

If English is not their first language extra steps may be necessary to ensure staff understand what they have been told. Ensure all staff are able to fully communicate customers allergen requirements

Introduce a buddy system during and after training to ensure your staff understand the training they have been provided. Buddies can ask each other questions to ensure the learning has been embedded.

9. Kitchen Equipment

Keep a separate workstation and equipment that will be used for orders with an allergy. Items could include: knives, aprons, cutting boards, spoons, mixer, pan, milk jugs, label this equipment where possible.

Any equipment that is specifically set aside for use on orders where an allergen has been identified should be marked/labelled, if possible, so it can be easily identified.

Old food containers – using old food containers is a way of saving some money, using those that stored allergens is a risk and should not be done.

If a piece of equipment is hard to clean and cannot be done thoroughly regularly, such as a vacuum packer or an oven ensure that free from items go through the machine before those that will be used for allergens.

An item which often is a risk for an allergen incident is a milk frother. Milk frothers present a high risk of cross contamination for people with a milk allergy - the nozzle should be cleaned down thoroughly in between uses and consumers warned of the risk.

10. Deliveries

If deliveries arrive damaged and leaking and there is a risk of contamination, don't be afraid to reject the delivery. It is important to ensure you know what is entering your kitchen.

The same situation applies if items arrive without allergen information, do not accept delivery without the information you need to prepare safe food.

You should ensure that a specific staff member has responsibility to check for substitutions on deliveries, this could be a head chef, or manager. Whoever you select for this role, they must be aware and trained on their responsibilities. This should be documented, for example in job descriptions. Any changes to ingredients should be logged. The allergy matrix for the day should be amended and the staff should be made aware of the specific changes. You should elect a specific staff member to maintain and update the allergy matrix. Again, this staff member should be trained on their responsibilities and it should be documented. Despite staff being told about changes to ingredients in such meetings. Staff must be trained to always consult the allergy matrix and share the information with the consumer when requested.

11. Displays

Ensure products that contain allergens are not kept in displays where cross contamination could occur, make sure baskets or display units are not restocked with free from items of previously used for items containing allergens.

12. Franchises and Local Stores

Check documents sent from head office. Head office might get it wrong.

Be prepared to add additional allergen checks throughout the business than those required by head office. You need to ensure your site is safe.

13. Ingredients availability

If you have to swap ingredients because the originals are not available, a new risk matrix must be completed to include any new allergens.

Staff must be made aware of the changes, the allergen matrix updated and menus checked where allergy information is presented to the consumer in that way.

14. Pre-booking

If taking pre-orders consumers should be asked at the booking stage for any allergen requirements, this should then be reconfirmed upon arrival.

15. Online or Phone Orders

Online orders should make allergen information available at time of order and time of delivery.

When selling through a third-party website, consumers should be clearly advised where allergen information can be found, before the order is placed. This could be by referring the customer to the food business's own website, or directly on the third-party website.

If allergen information is not available on the main website page then it should be no more than 'one click away' with a clear breakdown of what items contain which ingredients.

Written allergen information should also be provided upon delivery so the consumer can review it before eating the food. This could be a sticker on food containers or a menu with allergen information. Where customisations have been made, this should also be indicated. The delivery person could also verbally confirm the food meets the allergen requirements.

Staff should be trained to ask for any allergies during each phone call and record them on the order form.

There must be clear communication between the staff member taking the order and the kitchen and then to the member of staff giving the food to the consumer. Allergy checks should be addressed at each of these stages in supplying food the consumer.

16. Processes and general advice

If the person taking the order and receiving the allergen requirements is not the person preparing the food, or if the order is made digitally, the information should be passed directly to the person preparing the food in writing and there should be confirmation that they have received and understood the information.

It is important that businesses acknowledge allergens other than the 14 legislated exist and therefore should know what is in their food.

17. Front of House Guidance

Here are some practical steps for front-of-house staff members in a restaurant when informed that a customer has a food allergy:

1. Communicate Clearly:

- **Ask Specific Questions:** Enquire about the type of allergy and any specific details, record what you were told by the customer clearly.
- **Inform the Kitchen:** Immediately notify the kitchen staff and management about the allergy to ensure proper precautions are taken.

2. Verify Ingredients:

- **Check Menus:** Ensure that allergen information is clearly displayed on menus and be transparent about the ingredients used in dishes.
- **Confirm Details:** If unsure about any ingredient, it's safer to say "I don't know" and find out the correct information rather than assuming.

3. Prevent Cross-Contamination:

- **Separate Utensils:** Use separate utensils and preparation areas for allergen-free dishes to avoid cross-contact.
- **Label Orders:** Clearly label orders that need to be allergen-free before sending them to the kitchen.

4. Educate and Train:

- **Staff Training:** Regularly train staff on food allergy protocols and the importance of preventing cross-contamination.
- **Emergency Preparedness:** Ensure staff know the signs of an allergic reaction and are prepared to act quickly in case of an emergency.

5. Engage with the Customer:

- **Offer Alternatives:** Suggest alternative menu items or cooking methods that can accommodate the allergy.
- **Reassure:** Provide reassurance to the customer that their safety is a priority and that all necessary precautions are being taken.

Front of House Advice

- Consider managers taking over tables with allergies.
- Servers should be double checking orders before they are given to the customer.

- Allergen flags in food to identify the food for the consumer with an allergy i.e. gluten free burger.
- Turning people away if there is a real risk that the businesses cannot make the food or beverage in a safe way.
- While it is important for individuals to protect themselves, businesses are legally responsible to ensure that all food meets consumers expectations in terms of nature, substance and quality.

18. Further Information & Training

Allergy Pal is also a useful tool to ensure you and your staff are aware of precautionary allergen labelling and when it can and cannot be used - <https://allergy-pal.co.uk/>

Allergen eLearning training is also available from the Food Standards Agency and Business Companion:

- <https://allergytraining.food.gov.uk/>
- www.businesscompanion.info/en/quick-guides/food-and-drink/food-allergens-and-intolerance

Further advice can always be sought from Trading Standards or Environmental Heath Teams.

www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses

www.food.gov.uk/business-guidance/allergen-information-for-non-prepacked-foods-best-practice-summary

Posters and signage is available from the FSA for free here:

www.food.gov.uk/business-guidance/download-your-allergen-icons-and-posters



FOOD MENU	Milk	Egg	Lupin	Sulphur Dioxide	Gluten	Celery	Crustaceans	Molluscs	Fish	Mustard	Soybean	Peanut	Sesame	Treants
Fish, bean and rice bowl Tilapia, black beans, slaw, guacamole and pickled onions	✓					✓			✓					
Seafood & Chorizo Paella Saffron rice, with chicken, prawns, clams and vegetables				✓			✓	✓						
Avocado & Cos Salad Mixed beans, edamame, herbs, carrots, peanuts and cashews											✓	✓	✓	✓

19. If someone is having an allergic reaction.

Allergic reaction: Emergency protocol for anaphylaxis If someone is finding it hard to breathe, if their lips or mouth are swollen, or if they collapse, you should:

- Lie the person down and raise their legs – unless they're having breathing difficulties and need to sit up to help them breathe. If they're pregnant lie them down on their left side
- Call 999 immediately and state "Anaphylaxis".
- Check if the customer has an adrenaline auto-injector (often known as an epi pen) and can self-administer into their thigh.
- Unless you have received specific training in its correct use, do not administer the auto-injector. The customer may have a family member or friend who can help.
- Send someone outside to wait for the ambulance, and stay with the person until qualified help arrives.

20. When it does go wrong.

A full investigation needs to take place if an allergen incident happens within your business. This needs to take place while safeguarding existing customers. The investigation needs to identify what went wrong and what needs to be put in place to stop it happening again.

The FSA has a Route Cause Analysis (RCA) tool which should be used to identify what went wrong and how it can be reduced/removed in the future. Managers should complete the RCA training along with their regular allergen system training.

<https://rcatraining.food.gov.uk/#home>

www.food.gov.uk/business-guidance/online-food-safety-training

Businesses are legally required to inform their local authority/port health authority and the Food Standards Agency if there is reason to believe that food or feed is not compliant with the safety requirements and should be immediately withdrawn or recalled from sale.

www.food.gov.uk/contact/businesses/report-safety-concern/report-a-food-safety-incident

21. Allergy Tables

Allergen management house rules

An overarching document which sets out how you are going to manage allergens at each site. Use specific examples and named individuals who will oversee each section.

Allergen Matrix

One matrix should be completed for each product/menu item

Allergen Management House Rules












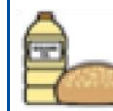


Enter a statement of your Allergen Management House Rules in the table below:

Describe your Control Measures and Critical Limits and the Monitoring including frequency			
Deliveries and labels			
Storage			
Preparing dishes			
Staff Training			
Communicating with your customers			
What to do in the event of an emergency			
Monitor/check any other appropriate records used by your business	Weekly Record		
Name: (Print)	Signature:	Job Title:	Date

The Allergen Management House Rules are an essential component of your HACCP based system and must be kept up to date at all times.

Hertfordshire Safe Food

Allergen Matrix Write a list of the food used in your business which contains these allergens.

Dishes														
	Celery	Cereals containing gluten*	Crustaceans	Eggs	Fish	Lupin	Milk	Mollusc	Mustard	Nuts†	Peanuts	Sesame seeds	Soya	Sulphur Dioxide
Tuna Salad [example]	✓			✓	✓		✓		✓					

Dishes and their allergen content (Note – Please state the name of the cereal(s) containing gluten* and/or the name of the nut(s)†)

Review date:

Reviewed by:

You can find this template, including more information at www.food.gov.uk/allergy-guidance