



ALLERGEN TRAINING

It is vital that catering staff play their part in protecting the health of their allergic and food-intolerant customers as many people, who suffer an adverse reaction to food such as an anaphylactic reaction, do so following consumption of food from a catering business.

Food allergens, the Law and Food Safety Management systems

All catering businesses have a legal requirement to sell safe food. They are required to have in place a food safety management system based on HACCP principles to assess risks and control food safety hazards (Regulation (EC) No. 852/2004).

The regulation was transposed into national law in the Republic and Northern Ireland by the following legislation:- o

ROI: Corrigendum to Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs. (see also S.I. No. 910 of 2005, S.I. No. 369 of 2006 and S.I. No. 387 of 2006).

NI: Food Hygiene Regulations (Northern Ireland) 2006 (SR 2006 No 3).

Traditionally, the hazards to be assessed included temperature control of hot and cold foods and cross-contamination of cooked food by raw food. Food allergies and intolerances are emerging risks and, like any other risk, should be considered and handled in the same systematic way.

Due Diligence

The defence of due diligence is acceptable in both jurisdictions.

In Northern Ireland, Regulation 21 of the Food Safety Order NI 1991 introduced the concept of due diligence to food legislation. Where a person was charged with any offence under the Food Safety Order, they could now claim due diligence in respect of their food business if they could prove that they took 'all reasonable precautions and exercised all due diligence' to avoid committing an offence.

A food business may be able to use the defence of due diligence in a food allergy prosecution if it can demonstrate that appropriate food allergy controls were in place and working effectively at the time an adverse event occurred on site.

In the Republic of Ireland, Paragraph 5 (3) (a) of European Communities (General Food Law) Regulations 2007 (S.I. No. 747 of 2007) refers to the due diligence defence particularly with respect to the offence of placing unsafe food on the market (in contravention of Article 14 of Regulation (EC)178/2002).

Best practice food allergen management

When a customer explains that they have a food allergy or intolerance and asks if a food is suitable for them, the business must have a system in place to handle their request and give them accurate advice. For that system to be effective, all staff should get basic training in food allergen management before they first start work so they are aware that the request must be taken seriously.

Many businesses are routinely controlling the traditional hazards using either their own food safety management system or an off-the-shelf one provided by the Food Safety Authority of Ireland or the Food Standards Agency Northern Ireland. Working in partnership with representatives of the catering industry and

Environmental Health Officers, they have developed a guide for caterers entitled, 'safe catering - your guide to making food safely'.

This joint initiative is intended to ensure consistency in the application of food safety legislation in the catering industry right across the island of Ireland.

The guide provides the caterer with practical advice on food allergies, their symptoms, the main foods that can cause reactions and, importantly, information on how to control allergens in a food business. The information in this booklet supplements these guidance notes.

Nominating an Expert

It is a good idea to nominate a responsible member of staff who will be charged with facilitating all allergy/intolerance related requests and who is trained in the topic.

A request should always be passed to the nominated staff member who can then talk to the customer to find out just what foods and ingredients they are trying to avoid.

Tact and Diplomacy

The staff member needs to deal tactfully with the customer to gain more information and although most allergic customers will welcome an open discussion, some people, particularly teenagers and those with other underlying health problems may be more reticent about discussing their dietary needs in detail, especially in public.

Ingredients

The nominated staff member needs to find out the ingredients of the food. This can be done by considering how the food was made up. Was it bought in? If so, the label on the ingredients packaging should be examined for allergen information (not forgetting the "may contain" warnings).

If it was bought in and part prepared in house, look at the labelling information and examine recipe information to find out just what the ingredients are.

You can make these tasks easier by setting up a system to retain ingredients information with the product, or on computer or in a file.

You should also have a copy of all recipes in an easily accessible position.

Staff should follow recipes closely and if changes have to be made, the recipes should be updated to include the addition or removal of an allergen.

Cross contamination

The nominated staff member needs to find out the potential for allergen cross contamination. Again this is assessed by considering how the food was prepared.

The following points should be considered as essential in the control of cross contamination and are similar in principle to the practices for preventing contamination of cooked food with raw food.

1 Food to equipment contact

Could the food being asked about have been in contact with equipment such as spoons, mixers, etc., without first washing them properly.

2 Food to food contact

Could the food being asked about have been in contact with the allergen or food containing the allergen, for example through shared storage or preparation areas?

Oil that has already been used to cook other foods should not be used to cook the food in question. For instance, oil used to cook prawns could cause a reaction in someone who is allergic to shellfish.

3 Food to hand contact

Could the food being asked about have been in contact with the allergen on someone's unwashed hands by which allergen was transferred from another food?

Once you have found the required information (and this should only take a few minutes if you have set up a system) it should then be given to the customer who must make the final decision as to whether or not the food is suitable for them.

Remember if you are unsure of any of the ingredients, or if there is any doubt about cross contamination, you must tell the customer.

The key to help you answer customer queries correctly is your food safety management system which should have the following controls in place.

Train all staff from day one to make them aware of basic allergen controls and in-house procedures plus regular refresher courses.

- ❖ Appoint a responsible member of staff to handle all food related queries and ensuring that all staff know who he/she is. Have a fall back position in case that person is absent.
- ❖ Maintain a thorough knowledge of your recipes and ingredients with regular updating.
- ❖ Manage recipe and ingredients information and have it available if requested.
- ❖ Ask suppliers to notify you of any ingredients changes.
- ❖ Check that items delivered match exactly those that were ordered.
- ❖ Store major allergens like nuts, peanuts and seeds separately and in lidded containers that should be marked or colour coded if possible.

Alert your staff to cross contamination risks and how to control them.

- ❖ Train all staff how to clean utensils and equipment to avoid cross contamination.
- ❖ Where practicable, ensure the information provided to customers on menus, signage, etc. highlights the presence of food allergens.
- ❖ Encourage the food allergic or intolerant customer to ask about the foods on sale through the use of appropriate signage.

A customer may ask you to prepare a meal free of an allergen

The points to remember are:-

- ❖ Make sure worktops and all the equipment used are thoroughly cleaned. This includes chopping boards, knives, mixers, bowls, pots, pans, griddles and utensils.
- ❖ Thorough cleaning can be achieved by the use of detergent and hot water.
- ❖ Where relevant, dismantle equipment to ensure that all allergen residues are removed.
- ❖ Do not use equipment which is encrusted with carbonised food residues eg. woks.

- ❖ Don't cook food in oil that has already been used to cook other foods.
- ❖ Ensure staff wash their hands thoroughly with soap and water before they prepare the meal and avoid touching other foods until they have finished preparing it.
- ❖ Assemble all the ingredients, check the labelling and recipes for the ingredient to be avoided.
- ❖ Control Cross contamination risks (described above).
- ❖ Think about how you control cooked and raw foods - same principles apply to the control of allergens.

Service: Points to remember

Once the special meal has been prepared, it should be kept labelled and protected from contamination. It should be kept separate from other meals until served. The manager or nominated staff member should deliver it, on its own, to the table of the allergic person to ensure that no mistakes are made.

If the worst does happen

If a customer takes an allergic reaction, you should act quickly as follows:-

- 1 Dial 999 (OR 112) immediately and advise the ambulance service that the person may be taking an anaphylactic (pronounced 'anna-fill-ak-tic') reaction and that immediate help is required.
- 2 Advise them of the location and telephone number of the premises and, where appropriate, of the post code.
- 3 Someone should go outside to wait for the ambulance to guide them to the premises as quickly as possible.

It is useful to keep a copy of this information including premises name, address, postcode and telephone number by the phone and advise staff accordingly.

Procedure for dealing with a query from your customer

This should be accessible to all staff
The customer wishes to know if a meal or other food is suitable for them.

- 1 Seek further clarification from the customer
 - ❖ Are they allergic or intolerant to that food OR is it for another reason, eg. dietary or religious reasons or simply they may not like the taste.
 - ❖ Which specific ingredient(s) do they want to avoid.
 - ❖ Don't guess about the ingredients

2 Refer the query to the manager or a senior member of staff:-

- ❖ The designated person to deal with allergy related requests is

- ❖ If unavailable, please contact

3 The person dealing with the query/request will need to find out:-

- ❖ Does the food in question contain the ingredient(s) the customer has asked about?
- ❖ The chef can advise on the ingredients that were already in it or subsequently added to it.
- ❖ Ingredient information should be kept available for the customer if they request this.

4 Where to find ingredients information:-

- ❖ If the product is bought-in and sold in its original package show the label to the customer.
- ❖ If you use bought-in pre-packed products as ingredients: information will be on the packaging or on the documentation delivered with the food. This can be shown to the customer.
- ❖ If you use fresh ingredients know these and show the recipe to the customer.

5 If the food contains the ingredient which must be avoided:-

- ❖ Tell the customer. ALWAYS BE TRUTHFUL.
- Remember, you can always recommend a safe alternative.

6 If the food does not contain the ingredient to be avoided:-

- ❖ Inform the customer.
- ❖ Consider the possibility that it could have been contaminated during the preparation, perhaps by sharing a spoon or knife or cutting board. Again inform the customer.

7 The customer makes the final decision

- ❖ Once the information on the food, its ingredients and the possibility of cross-contamination has been provided, assessed and given to the customer, the customer must make the final decision whether or not to purchase the food.



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Disclaimer: This guidance is provided in good faith and outlines the general principles of good food allergen management. Safefood / QMARK.IE disclaims any responsibility for any adverse effects resulting from following the information in this publication. safefood / QMARK.IE does not give any guarantee that following the advice in this publication will prevent an allergic reaction from occurring. The food business should ensure that it complies in full with the legislative requirements for the manufacture, preparation and sale of safe food. Sole responsibility for the safety of supplied food rests with the proprietor.

Further information available from safefood.eu & fsai.ie