



ELAN Catering Operations: Food Allergen Management

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1.0	July 2026	Estates Manager (Lead)	New catering operations policy. Previous trust catering policy separated into two catering operations policies; 'In-house Catering Policy' and 'Food Allergen Management Policy' to align with new legislative requirements effective from 1 Sept 2026.

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1.0 Policy Statement

- 1.1 Extend Learning Academies Network (ELAN) is committed to safeguarding all pupils, staff, visitors and contractors who have food allergies, food intolerances or medical dietary requirements.
- 1.2 The Trust recognises that food allergens can present a significant risk to health and that allergic reactions can range from mild symptoms to life-threatening anaphylaxis. The Trust will take all reasonably practicable steps to identify, manage and reduce the risks associated with food allergens across its schools and catering operations
- 1.3 This policy establishes the Trust's arrangements for allergen management and supports compliance with food safety legislation, food information regulations and emerging requirements associated with Benedict's Law from September 2026.

2.0 Purpose

- 2.1 This policy aims to:
 - protect pupils, staff and visitors with food allergies and intolerances
 - ensure accurate allergen information is available
 - prevent allergen-related incidents wherever possible
 - establish clear roles and responsibilities
 - ensure safe management of meals provided by ELAN
 - promote awareness and understanding of food allergies
 - ensure effective emergency response procedures are in place
 - support compliance with current and future allergen legislation.

3.0 Scope

- 3.1 This policy applies to:
 - all ELAN schools
 - ELAN catering operations
 - headteachers and school staff
 - catering employees
 - contractors and volunteers involved in food activities
 - parents and carers
 - activities involving food on school premises.
- 3.2 This policy should be read alongside:
 - ELAN In-House Catering Policy
 - ELAN Supporting Pupils with Medical Needs and First Aid Policy
 - ELAN Health and Safety Policy

- Individual Healthcare Plans
- Allergy Action Plans

4.0 Legislative Framework

4.1 This policy supports compliance with:

- Food Safety Act 1990 Food Information Regulations 2014
- Food Hygiene Regulations
- Food Safety and Hygiene Regulations 2013
- Natasha's Law (PPDS food labelling requirements)
- Department for Education guidance relating to medical conditions in schools
- Relevant allergy and anaphylaxis guidance
- Benedict's Law and any associated statutory guidance issued by Government (from September 2026).

5.0 Definitions

5.1 Food Allergy

A food allergy occurs when the body's immune system reacts adversely to a food that is normally harmless. Reactions may be mild or severe and can lead to anaphylaxis.

5.2 Food Intolerance

A food intolerance is a non-immune reaction usually affecting digestion and causing discomfort or illness. Symptoms are typically less severe than those associated with food allergies.

6.0 Roles and Responsibilities

6.1 Board of Trustees

The Board of Trustees is responsible for:

- approving this policy
- ensuring strategic oversight of allergen management
- receiving assurance that allergen risks are being appropriately managed.

6.2 Chief Executive Officer

The Chief Executive Officer is responsible for:

- ensuring adequate resources are available for implementation.
- supporting compliance with legal requirements
- monitor compliance and improvement actions

6.3 Estates Manager (Lead)

The Estates Manager (Lead) will:

- oversee implementation of this policy
- ensure allergen management systems are reviewed
- monitor compliance and improvement actions.

6.4 **Catering Operations Manager**

The Catering Operations Manager is responsible for:

- leading allergen management across the ELAN
- approving allergen control procedures
- maintaining allergen information systems
- verifying supplier allergen information
- managing allergen training programmes
- supporting schools where pupils have complex dietary requirements
- investigating allergen-related incidents
- conducting allergen audits and monitoring.

6.5 **Headteachers**

Headteachers are responsible for:

- ensuring allergy information is obtained from parents and carers
- ensuring allergy information is updated and reviewed regularly
- maintaining risk assessments for pupils with allergies
- ensuring staff are informed of relevant allergies
- supporting emergency response arrangements
- ensuring allergy information is entered onto SchoolGrid and other appropriate systems
- managing allergen risks associated with school-led food activities.

6.6 **Chef Managers**

Chef Managers are responsible for:

- implementing allergen control procedures
- maintaining allergen records
- ensuring allergen matrices remain accurate
- preventing cross-contamination
- ensuring staff understand allergen procedures
- reporting concerns, incidents and near misses immediately
- monitoring compliance within kitchens.

6.7 **Catering staff**

Catering staff shall:

- following allergen management procedures all catering procedures
- attend mandatory training
- report concerns immediately
- verify allergen information before serving food
- take reasonable steps to prevent cross-contamination
- follow all instructions relating to allergen-safe meal preparation.

6.8 Parents and Carers

Parents and carers are responsible for:

- informing the school of food allergies and intolerances
- providing accurate medical information
- providing updated information when circumstances change
- supplying prescribed emergency medication where required
- participating in discussions regarding risk management and medical care plans
- informing the school of any allergen-related incidents occurring outside school.

7.0 Identification and Recording of Allergies

7.1 Schools shall:

- record allergy information during admissions
- obtain supporting medical information where appropriate
- every pupil with a significant allergy shall have an Individual Healthcare Plan and Allergy Action Plan, reviewed annually or following changes maintained by the school
- ensure information is reviewed at least annually
- update records immediately following notification of changes
- ensure relevant information is available to authorised staff

7.2 Where a pupil is assessed as being at significant risk, an individual risk assessment shall be completed and reviewed regularly.

8.0 The Regulated Allergens

8.1 The Trust maintains systems for identifying and controlling the 14 allergens required by law:

1. Cereals containing gluten
2. Crustaceans
3. Eggs
4. Fish
5. Peanuts
6. Soybeans
7. Milk
8. Tree nuts
9. Celery
10. Mustard
11. Sesame
12. Sulphur dioxide and sulphites
13. Lupin
14. Molluscs

- 8.2 The Trust may implement additional controls where a pupil has a severe allergy to substances outside the statutory list.

9.0 Allergen Information Management

- 9.1 ELAN shall maintain:

- recipe specifications
- ingredient declarations
- supplier allergen data
- menu allergen information
- allergen matrices

- 9.2 Allergen information shall be:

- accurate current
- readily available to authorised staff
- accessible at points of service
- reviewed whenever ingredients, suppliers or recipes change.

10.0 SchoolGrid and Meal Ordering

- 10.1 The Trust will utilise SchoolGrid or its successor system to support allergen management.

- 10.2 Where allergy information has been entered and verified:

- meal choices shall be restricted to suitable options
- parents and carers shall remain responsible for ensuring selections remain appropriate
- schools shall ensure records remain up to date.

11.0 Allergen Control Procedures

- 11.1 ELAN kitchens shall:

- maintain allergen matrices
- clearly identify ingredients and allergens
- verify ingredients before use
- ensure recipes are approved centrally
- maintain allergen-safe preparation procedures
- label allergen-specific meals where required
- carry out routine checks and audits
- ensure allergen information is available at service points

- 11.2 Chef Managers shall undertake and record routine verification checks confirming recipe compliance, allergen matrix accuracy and allergen-safe meal production procedures.

12.0 Prevention of Cross-Contamination

- 12.1 The Trust recognises that complete elimination of allergen risk cannot always be guaranteed within a production kitchen. However, all reasonable measures shall be taken to minimise risk.

These measures include:

- effective handwashing
- thorough cleaning procedures
- appropriate food storage arrangements
- separation of ingredients where required
- use of dedicated utensils where appropriate
- correct meal labelling
- staff training and supervision
- verification checks before service.

13.0 Nut-Aware and Nut Free Arrangements

- 13.1 ELAN schools aim to maintain a nut-aware and, wherever reasonably practicable, nut-free environment.

- 13.2 The following items should not be brought onto school premises:

- packs of nuts
- peanut butter sandwiches
- foods containing visible nut products
- nut-based cereal bars
- cakes containing nuts
- other foods identified by the school as presenting a significant allergy risk.

- 13.3 The Trust does not knowingly use nuts as ingredients in food prepared within its kitchens. However, complete exclusion of nut traces cannot be guaranteed due to manufacturing and supply chain factors.

14.0 School Activities Involving Food

- 14.1 Schools remain responsible for allergen management outside the core estates catering service, including:

- classroom food activities
- Food Technology lessons
- breakfast clubs
- after-school clubs
- educational visits
- enrichment activities
- fundraising events
- PTA activities
- packed lunches brought from home.

- 14.2 Appropriate risk assessments shall be completed where allergen risks are identified.
- 14.3 Schools are responsible for ensuring that it has inclusion arrangements for pupils with allergies.

15.0 Emergency Response and Anaphylaxis

15.1 Where an allergic reaction is suspected:

1. The pupil's Allergy Action Plan shall be followed.
2. Emergency medication shall be administered where appropriate.
3. Emergency services shall be called immediately if anaphylaxis is suspected.
4. Parents or carers shall be informed as soon as practicable.
5. The incident shall be recorded and investigated.
6. Any lessons learned shall be incorporated into future risk controls.

16.0 Training and Competence

16.1 All catering staff shall complete:

- Food Allergy Awareness Training
- Allergen Management Training
- Cross-Contamination Prevention Training

16.2 Relevant school staff shall receive:

- Allergy awareness training
- Emergency response training
- Anaphylaxis awareness training.

16.3 All staff shall receive annual allergy awareness and anaphylaxis training.

17.0 Auditing and Monitoring

17.1 The Catering Operations Manager shall establish a programme of monitoring that includes:

- kitchen allergen audits menu reviews
- record checks
- supplier verification reviews
- incident investigations
- training compliance reviews.

17.2 Audit findings shall be reported to the Estates Manager and appropriate improvement actions implemented

18.0 Benedict's Law

18.1 In preparation for Benedict's Law and any associated statutory requirements from 1 September 2026, ELAN will:

- Review allergen management arrangements annually
- Strengthen communication regarding allergies and dietary requirements.
- Ensure allergen information is available at point of ordering and service.
- Maintain accurate digital allergy records.
- Review staff training requirements.
- Enhance allergen incident reporting and investigation processes.

18.2 Application of Benedict's Law:

- Spare AAIs to be held in every school
- Storage arrangements will be detailed by schools
- Expiry date checks will be undertaken by schools
- Staff training in administration and use of AAI's will be undertaken at each school
- Availability within rapid response times.

18.3 Each school shall appoint a named member of the Senior Leadership Team as School Allergy Lead.

18.4 In compliance with the legislation, this policy shall be published on each school website and made available to parents and carers.

18.5 All allergen incidents and near misses shall be recorded, investigated and reviewed by schools.

18.5 All catering employees shall receive annual food allergen and anaphylaxis awareness training.

18.6 ELAN Catering Operations shall ensure allergen information is available at the point of ordering, point of production and point of service, supported by accurate recipe specifications, allergen matrices and digital dietary records.

19.0 Monitoring and Review

19.1 This policy will be reviewed annually, or sooner where:

- Legislation changes
- Government guidance is updated
- Benedict's Law requirements are amended
- Significant allergen incidents occur
- Monitoring identifies deficiencies requiring revision
- The Trust adopts a precautionary approach and will seek to implement best practice standards wherever reasonably practicable.

20.0 Related or Associated Documents

Signpost	Document Title	Responsibility
Policy	ELAN In-House Catering Policy	Estates Manager (Lead)
	ELAN Supporting Pupils with Medical Needs and First Aid Policy	Estates Manager/Headteachers
Supporting documents / procedures	Individual Healthcare Plans	Headteachers
	Allergy Action Plans	Headteachers
	SchoolGrid User Procedures	Catering Operations Manager