



HOW TO STOP ALLERGENS FALLING OFF THE AGENDA

STS FOOD SAFETY 2018

Part of the **ELAS** group of companies





Executive Summary

The number of food allergen sufferers in the UK is increasing although there is no clear understanding as to the reasons why. Some 1 in 4 food allergen sufferers report that they have suffered an adverse reaction when eating out, and 1 in 5 have required hospital treatment. There have also been some high profile fatalities.

Food businesses are legally and morally obliged to ensure that clear and accurate advice is available to consumers. The STS expert panel examined the common challenges and detailed best practice guidelines, which include:

- Making sure training hits the spot.
Adopt a 'Step into my Shoes' approach
- Ensuring that information is always correct.
Work with food suppliers and conduct regular checks
- Taking steps to help customers and ensure that allergen orders are treated with absolute care
- Keeping allergens high on the list of priorities
- Thinking about whether technology can help

Introduction

When the Food Information Regulations were introduced in 2014, there was an enormous focus placed on allergen awareness across the food industry. The subject was national news and many food business operators ensured that their staff were trained in the new requirements. Menus were reviewed, signage was designed and displayed, and allergen matrices were developed to ensure that members of the public were given the correct advice.

Now four years on, is there a risk that the focus on allergens could be slipping off the agenda? Despite the legislation there have been several high profile fatal incidents and some food businesses are still challenged when it comes to achieving compliance. Our panel of experts bring together their experience and best practice for ensuring that allergen awareness remains firmly front and centre in their operations.

What are the Common Challenges?



Training

Training is fundamental to making sure that mistakes don't happen. If staff are not trained, then there is a strong chance that something will go wrong.

Many businesses include allergen training within their induction programmes, and most get this spot on. However even with the best training and best information available there is still the issue of how this information is being passed on to customers. Effectively the risk is more related to situation or people management. It's also important to remember that, even with the most robust training systems in place, accidents and mistakes can still happen.

In some businesses training is more informal and, as such, staff are not provided with enough detail to confidently manage customer enquiries. Others may adopt a policy of leaving management to deal with allergen queries i.e. the less staff know, the less they can say. This is ok in many cases so long as staff know never to guess at the contents of a dish when a customer asks but, if this is the process, the management team needs to have attended a recognised, higher-level allergen management training programme. It's also vital that staff have been trained in the process and understand fully the importance of checking the allergen content of dishes with managers each and every time they get a query.

The hospitality industry is well known for having significant staff turnover, although some are better than others when it comes to retention. Businesses which recognise that their culture is all about their people generally have greater staff retention rates and, as such, retraining or refresher training is less of an issue. However where turnover is high, there is the constant problem of training new members and ensuring that those with longer service have regular refresher training.

Customers

Food businesses rely on customers telling them if they suffer from a food allergy. Simply put, if the customer does not reveal that they suffer from food allergies there is nothing that a food business operator can do to help. It is imperative that customers raise any concerns they have with menu items prior to ordering. One major restaurant group believes that they serve at least 10,000 allergen sufferers each week and wants to ensure that those customers make choices just as easily as those who do not have food allergies. Therefore, steps need to be taken to ensure that there are no barriers to customers communicating allergies, including peer pressure within younger generations (research shows particularly 16-24-year-olds) or older customers not wanting to make a fuss.

Incorrect Information

The provision of clear, concise, accurate information to customers is of the utmost importance. If the right information is not available, then even the best trained front of house teams will not be able to safely advise allergen sufferers.

Most food businesses change menus regularly. Even when popular dishes remain on the menu, ingredients and suppliers can change. When changes occur, allergen information may not always be provided to chefs and front of house teams straight away which can lead to the customer receiving the wrong information. The consequences of this could be catastrophic if a customer has an allergic reaction to an ingredient. If teams cannot be relied upon to provide accurate information then customers with food allergies will not have the confidence to eat there.

Manufacturers also regularly use the 'may contain' moniker despite some of the listed allergens never coming near their business. This is an understandable frustration for many customers, resulting in food being avoided when it does not need to be.

Product Reformulation

One key risk of product formulation is when customers with allergens believe that they know which foods on a menu are safe for them to eat but are unaware that the recipe or supplier base has changed. This can lead to accidental contact with allergenic ingredients. From a retail point of view, where reformulation leads to additional or changed allergens in a food item, there is the challenge of dealing with point of sale information, packaging and labelling. In multi-site operations this is then exacerbated by the fact they then need to rely on all sites following the instructions provided to the letter each-and-every time there is a change, no matter how big or small it may be.

Food manufacturers also often reformulate products, or distributors appoint alternative suppliers. Whilst the product name or description does not change or there is no obvious amendment to packaging, there is every possibility that the ingredients have changed. As a result, customers can be given incorrect information simply because a food business operator is unaware of a change that has been made by the manufacturer or distributor.

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Supplier Substitution

This issue is something of a variation on a theme from product reformulation. Instead of individual ingredients within a product being changed, sometimes the entire product itself can change if it has been sourced from a different location or the usual product is unavailable. Suppliers will often swap in a similar product in order to fill an order. The concern with this is that while the allergen information within the food business would be available as usual, it may not necessarily be accurate to the ingredients, resulting in customers being exposed to allergens.

Product Recall/Withdrawal

The majority of product recalls or withdrawals are allergenic in nature; most are due to labelling errors and the root cause is often simple. Many food manufacturers have robust procedures in place to ensure that recalls or withdrawals are handled properly, and the Food Standards Agency supplements the process, helping to minimise the risk to final consumers.

However, caterers who do not have good supply chains in place may not be aware of recalls or withdrawals being instituted and, as such, are at risk of providing food that contains unlisted allergens.

Enforcement (Or Lack Of)

There is the perception that enforcement carried out by local authority environmental health teams varies across the UK or even, in some cases, within the same teams. Some authorities are extremely proactive and make use of allergen survey questionnaires during their inspections, whereas there is some evidence that shows that other local authorities involvement in this area is much less thorough. This evidence is, however, very subjective and is also reflective of the variance in general enforcement of food standards and food safety across local authorities, due to the enforcement policies being set at individual authority level. However, this does generate concerns, especially considering the number of allergen sufferers reporting adverse reactions after eating out.

The perception of inconsistent enforcement raises the problem of a mixed level of compliance across the UK. This is mainly down to food business operators ensuring that their allergen information is correct in areas with proactive local authorities, whereas elements of non-compliance arise in areas with less thorough enforcement.

It's also worth noting that enforcement officer training is also fundamental when it comes to ensuring that accurate and good information is provided during inspections. Simply put, if the enforcement officer does not have the requisite knowledge then they cannot pass it on to the food business operators as required.

Top Best Practice Guidelines



Make Sure Your Training Hits the Spot

Good training is essential and there are standardised options available via classroom and e-learning courses, all of which have benefits. However the most important thing is making sure that the training you provide is relevant to the products you are serving and the processes you are following.

Remember allergen training is not just for front of house, customer facing teams; back of house teams must be given good instruction on how to store and prepare foods safely to avoid accidentally contaminating foods with allergenic ingredients. Supervisors must also be given the knowledge needed to properly monitor their staff and make changes, where necessary.

Personalising training is a great idea. Adopting a 'Step Into My Shoes' approach can be really helpful, for example, asking team members and managers to try and live without an allergenic ingredient in their diet for a short period of time helps to generate an understanding of how difficult this can be. It's critical that teams are aware of the impact that allergens can have. Food allergies can be fatal, so food business operators need to dispel any thoughts that these are nuisance customers who just want attention. A short video called Our Food Allergy Story has been produced by the FSA, it is available online and is extremely useful.

Don't just think that a one-off training course will cover your team, it's essential to provide refresher training to keep knowledge updated. Whenever new items are introduced to menus or new products are developed, training on how to put this food together should always include allergens. Menu briefings - whether daily, weekly or seasonal - should touch on allergy management and you should keep the subject in the forefront of your teams' minds at all times.

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Supply Base

Understanding your food ingredients is highly important, so make sure that you have a good and trusted supplier base. If you use the same suppliers consistently you will be able to have confidence in the allergen specifications for the foods they supply you with. However, this on its own is not sufficient.

You must also make sure that deliveries are checked when they arrive, and that packaging has not changed. If it has changed you should immediately think allergens, check the listed ingredients and compare them with the allergen information that is provided to your kitchen and front of house teams.

It's important to develop a good relationship with your supplier base, take steps to ensure that they know you won't accept substitute items on your deliveries and do your best to get assurances that they will keep you informed if, and when, they reformulate any of their products.

It's good practice to be signed up to the FSA's recall/withdrawal alert system to monitor and manage the risk of product recalls. This is easy to do. As soon as a product is recalled you will receive an email, allowing you to check any foods you have in storage to see if they are involved.

Take Steps to Avoid Consumer Complacency

While first time customers will often ask what is in a dish, regular or repeat customers can often think that they know which of your dishes are safe for them to eat, or that they know what ingredients are in a product. It's therefore good practice to ensure that they are prompted to ask. Regular adjustment of your allergen information signage can help, as can stating that some products may have changed recently.

Good customer service practices such as front of house teams checking with each customer when an order is taken does not put consumers off, instead it gives them greater confidence that you take allergen management seriously.

Believe it or not, removing allergen information or symbols from your menus can have a positive impact as this will prompt customers to ask about allergens. It may seem like an unusual step but, in this case, less is more.

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Report Allergen Complaints

Not every food business undertakes reviews of food complaints or customer feedback, although in these days of social media and review websites such as Trip Advisor it is becoming more common to do so.

Ensuring that you review allergen complaints is a critical tool that allows you to recognise if you have a problem.

Some of the large restaurant groups report allergen incidents on at least a monthly basis. This might not be for everyone and smaller operators may not have structured reports in place, however, making sure that you are fully aware of customer feedback is vitally important, as it allows you to learn about weaknesses within your business that you may not have previously picked up on.

Technology

There are an increasing number of technological solutions available to assist with allergen management. Some are complex, others less so. If you are a fan of technology, then there's plenty of choice out there to help manage your allergen information.

Some of this technology works directly with the food manufacturers. Their product specifications are pre-loaded, allowing you to build your recipes within the system; this results in a very detailed product specification along with comprehensive allergen information. Others are simpler and require you to add in all your ingredients before producing information regarding allergen content.

While technology is not for everyone, it certainly has a place when it comes to the management of allergens. However, if spreadsheets and tick matrices work best for you and help keep your customers safe then don't feel that you have to change.



Treat Allergen Orders with Care

It's not only frustrating but also potentially dangerous for a customer to specify the foods which they cannot eat but then find them on the plate when their order is delivered. Busy kitchen teams can occasionally miss special instructions so good handling practice of orders is essential. Two key tips are:

- 1** Make the orders look different. If they are handwritten, use a different colour pen to highlight allergenic requirements. If they are printed, look to work with your printer supplier to see if they can make changes to checks with allergenic requirement when they print e.g. using capital letters or colour. When food is served it is a good idea to use flags to highlight to the front of house staff which meals are for the allergenic customer – this is a simple but very visual solution.
- 2** Ensure that when staff take orders from allergenic customers, they follow the order into the kitchen and notify the back of house team. If they are busy, so what? It is far more important that these orders are handled safely than that the next customer gets served slightly quicker. Nobody is going to mind if you are seen to be taking care with another person's order.

Highlight Your Allergen Notices

Many notices are designed to fit in with the look and ethos of a food business. This can create the risk that customers do not see them as clearly. While most allergen sufferers will be aware that they can ask for information, it does no harm to ensure that your allergen signage is as visible as possible.

It may be necessary to think about your client base and make signage more visibly encouraging or appealing to those customers who could be affected by peer pressure, rather than simply having to announce that they suffer from food allergies.

Make Regular Checks

It's essential to ensure that you review your allergen information on a regular basis. If you have good relationships with your suppliers, then there's a good chance that they will keep you informed if they change the ingredients in a product. However this is not always that case, and mistakes or miscommunications are always possible.

Reviewing allergen information can sometimes be seen as time-consuming but it is an area where time is well spent. Checking allergen information does not have to be a lengthy affair. Schedule time each week, or month, to check a proportion of your menu items, and ensure that all are checked on a regular basis. Undertaking spot checks in your kitchens is also a great way of generating confidence that back of house teams are following recipes accurately and not introducing unlisted ingredients. These checks should also look at how food is being stored and prepared. A good idea is for a member of the management team to regularly follow an allergenic customer's order from start to finish to see that your full procedures are being followed. Where they are not, then feedback and, if needed, re-train the team. This is vitally important.

Case Study

January 2015, Manchester

An 18-year-old student from Salford died three days after eating a chicken burger that had been prepared in buttermilk in a Manchester restaurant. She had advised the restaurant of her milk allergy but mistakes were made and incorrect advice was given.

What went wrong?

The customer advised staff of her allergy to milk, fish and nuts but she was advised by the front of house staff that the dish she ordered did not contain any milk. The staff member taking her order advised the head chef of the allergenic requirement of the customer but the actual food ordered was not discussed. The allergen book was not consulted or offered to the customer for her reference. As a result, the customer was provided with a meal that contained milk.

What could you do to prevent making similar mistakes?

- 1 Communication – front of house and kitchen teams should confirm allergen orders and double check the actual allergens in each dish. Making sure that the same person who takes the order also delivers it to the table is a great way to avoid mistakes. Involving your customers when checking through the allergen book at the point of ordering will also help massively.
- 2 Training – make sure that the training you have given is being implemented. Regularly question your teams and provide retraining where staff are not clear on what procedures to follow.
- 3 Information – make sure that allergen information is always up to date. We recommend that the allergen book is reviewed every time a menu or recipe is changed, or when new suppliers are brought on board.



Summary

The general consensus of the panel is that allergens remain high on the agenda for the majority of food chains but there can be confusion or lack of knowledge amongst some smaller independent businesses.

There is work that needs to be done to join up the regulation of allergen management in order to reduce this gap and offer clarity across the board. Standardising supplier specs, educating the consumer and creating the right environment for them to feel comfortable declaring allergens without being treated differently are areas in which improvements can be made.

About the Panel

STS is proud to be working alongside a number of food safety experts from across the hospitality industry. We would like to acknowledge our gratitude to:

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