



Dietary Requirements Policy

including food allergy management

January 2024

Version 1

Review date: January 2026

REVIEWS:		
DATE OF REVIEW: 17/01/2024	REVIEWED BY: Fran Skinner	COMMENTS:
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KEY FACTS:

- To ensure all users of the estate are well nourished, and have access to safe, healthy and nutritious food, and a safe, easily available water supply during the day.
- To ensure that robust systems are in place to ensure accurate and timely sharing of information relating to dietary requirements with clearly defined responsibilities.
- Supporting with the management of specific dietary requirements.
- To ensure that food labelling, menu planning and all aspects of food preparation support the needs of users who have specific dietary requirements.

1. Policy statement

- 1.1 The Bushcraft Company recognises that a number of company's users may suffer from potentially life-threatening allergies or intolerances to certain foods or have specific dietary requirements.
- 1.2 The company's position is not to guarantee a completely allergen free environment, rather to minimise the risk of exposure by hazard identification, instruction and information. This will encourage self-responsibility to all those with known allergens to make informed decisions on food choices.
- 1.3 It is also important that the company has robust plans for an effective response to possible emergencies.

2. Legislation

- 2.1 As of 1 October 2021, all foods packed and produced on the premises must be clearly labelled with a complete list of ingredients. This legislation will be legally enforced under Natasha's Law. The purpose of this legislation is to protect the estimated 2 million people diagnosed with food allergies in the UK.
- 2.2 The Food Information to Consumers (FIC) passed legislation in December 2014 which introduced a mandatory requirement for allergen information to also be provided on non pre-packaged foods. The purpose of this legislation was to give allergenic ingredients more prominence.

3. The Bushcraft Company Allergy Aware Position

- 3.1 The company maintains an Allergy Aware position. This means implementing processes and procedures to minimise the risk of exposure to allergens for all individuals suffering from a food allergy.
- 3.2 This approach is advocated by The Anaphylaxis Campaign and Allergy UK. They do not support a blanket ban on any particular allergen in any establishment, with nuts being the most commonly targeted allergen. This is because nuts are only one of many allergens that could affect individuals, and no establishment could guarantee a truly allergen free environment for anyone living with food allergy. They advocate instead for establishments to adopt a culture of allergy awareness and education.
- 3.3 In respect to nuts, no nut-based products (products containing nuts on the ingredients list) will be purchased. Where a product does not as standard contain nuts (as listed on the ingredients list) but the manufacturer has included a 'may contain nuts' or 'may contain traces of nuts' warning, the product may be purchased if a suitable alternative is not immediately available. These products must be stored, prepared and served as an allergen containing product, including labelling of the food as such, and its use considered in the allergen matrix.

4. Estate responsibilities

- 4.1 The estate will establish clear procedures and responsibilities to be followed by staff in meeting the needs of individuals with additional dietary requirements.
- 4.2 The estate will ensure that they have up to date dietary and medical information for each person on site.
 - For school groups and visitors - A request for dietary and medical information will be sent out (via the Group Planner) to each school and/or visitor once the booking is confirmed with the view to have this information back 4 weeks prior to the trip.
 - For staff – dietary and medical information is captured upon commencement of their role and an update requested annually, or when a change in their health is notified.
- 4.3 The Customer Service Manager will review the completed Group Planner and ensure all requirements are clear and can be met by the Catering Team. The Catering Team will be consulted where required. Any additional information that is required for this process will be requested from the school or visitor.
- 4.4 A Dietary Requirements Report should then be produced by the Customer Service Manager for each group. This register will contain each individual with a requirement and will be subdivided into four categories:
 - RED category – Individuals with severe food allergies requiring an adrenaline auto-injector
 - BLUE category – Individuals with moderate food allergies, intolerances or Coeliac Disease, not requiring an adrenaline auto-injector
 - GREEN category – Individuals with religious requirements, Vegetarian, Vegan
 - YELLOW category – Individuals with Type 1 Diabetes
- 4.5 The Dietary Requirements Report should be available to the group's leadership team and the estate catering team. It should be displayed in the Kitchen area and a location that can be accessed readily by leaders whilst maintaining confidentiality.
- 4.6 The estate is responsible for establishing an allergen management system for any food bought into estate by others (see the snack section below).
- 4.7 Individuals with Type 1 Diabetes need to know the carbohydrate content of their meals in order to calculate their insulin dose and manage their condition effectively. The Catering team can provide a breakdown of the meals planned and typical carbohydrate content to the school or visitor to assist with management.
- 4.8 The estate will ensure that all staff have access to allergy awareness training. We currently recommend training through IHASCO (via Nimble) for Food Safety.
- 4.9 Upon arrival, the estate management will ensure site users are informed of the system used to identify and serve food to individuals and their responsibilities within this.

5.0 The Bushcraft Company responsibilities

- 5.1 The Customer Service team will liaise with the estate team to ensure all the necessary dietary information on those individuals with dietary requirements is present and up to date on the Dietary Requirements Report, 2 week prior to the trip.
- 5.2 The Catering Manager will ensure that all purchased goods are from nominated company suppliers where full allergen data is available for review. They will diligently monitor the allergen information provided by suppliers and question where insufficient information is received. Particular attention should be paid to any substituted items which may contain allergens.

- 5.3 The Catering Manager will ensure that all catering team members are trained in allergy awareness. They should also appoint an Allergy Champion who has been trained in allergy management.
- 5.4 Where possible, menus should be planned to minimise the use of allergenic ingredients.
- 5.5 Specific menus should be prepared in advance for those individuals within the RED and BLUE categories and a separate meal prepared if the food on the main menu is not suitable. Ideally meals should be pre-plated in the kitchen and labelled with the individual's name, or the meal identified directly to the lead teacher / visitor responsible for the group.
- 5.6 The Catering Team will ensure that all food preparation and storage practices recognise the potential for cross-contamination between foods and the need to control allergens in this respect. An allergen label should be used for any products that are made inhouse.
- 5.7 The Catering Team will hold information folders during each service outlining the contents of all dishes bring served.
- 5.8 The Head Chef should ensure that an allergen matrix is completed and signed off before service. A pre-service briefing should take place using the allergen matrix and no staff member should be allowed to serve foods without undergoing the daily pre-service briefing.
- 5.9 A separate allergen matrix should be completed for each type of service, such as packed lunch, snacks and all other occasions when food is served.
- 5.10 The Head Chef is responsible for checking that the allergen information signage is displayed in a prominent position in each food service area.

6.0 School/Visitor responsibilities

- 6.1 The school or visitor must provide the Customer Service team with a completed Group Planner at least 4 weeks prior to the trip.
- 6.2 The school or visitor must ensure that they inform the Customer Service team if there are any changes to the information disclosed on the Group Planner in the build-up to the trip.
- 6.3 During service, the lead teacher / visitor is responsible for ensuring each individual receives the correct meal for their dietary requirements. This may be different per estate and will be briefed upon arrival.

7.0 Estate User Responsibilities

- 7.1 They will understand how their food will be served and how food allergens, where applicable, will be notified and be able to question if this changes.

8.0 Meal Service Procedures

- 8.1 Allergen information signage must be displayed in a prominent position in each food service area.
- 8.2 Estate users must follow the meal service procedures which takes into account the needs of individuals with specific dietary requirements. Where the estate operates a 'Front of the queue' system, the lead teacher / visitor is responsible for bringing the individuals with specific dietary requirements (as identified above) to the front of the queue in order to highlight them to the catering team, if appropriate.

- 8.3 Any pre-packaged items, such as sandwiches, should have a full list of ingredients (including allergens) label attached.
- 8.4 Grab and Go items – where these are pre-packaged, a full list of ingredients (including allergens) label should be attached. Where they are not, clear allergen signage must be available.
- 8.5 Key members of staff (allergy champions) should be clearly identifiable and able to assist with information on allergens contained within the foods being served.

9.0 Fussy Eaters

- 9.1 Fussy eaters are not catered for on an individual basis, the catering team will endeavour to find something for them to eat on site if an individual refuses to eat the meal options provided. A plain alternative of pasta, rice, vegetables and/or potatoes will be offered.

10.0 Snacks

- 10.1 Any snacks plated and covered for consumption outside of the dining areas should have a full list of ingredients (including allergens) label attached.
- 10.2 Where schools / visitors wish to bring their own snacks should do so with awareness of the allergens present within them, and the specific dietary requirements of the individuals within their group.
- 10.3 It is requested that snacks containing nuts on the ingredients list are not brought to the estate. Any snack that does not as standard contain nuts (as listed on the ingredients list) but the manufacturer has included a 'may contain nuts' or 'may contain traces of nuts' warning, may be brought on site, but must be kept separate and in a sealed container to avoid the risk of cross contamination.

11.0 Bringing Alternative Food for Meal Times

- 11.1 Due to food safety concerns and EHO regulations, individuals cannot bring their own food onto estate or use the kitchen refrigeration facilities for cross contamination purposes.
- 11.2 In extreme cases, and only with express permission of the Senior Management Team, individuals with medical, e.g., Autism, food aversions, or complex food allergies, may provide their own food as long as it is in sealed, refrigerated cool boxes or bags to avoid any cross contamination or spoilage. Unless otherwise agreed, the safe storage of this food is the responsibility of the school / visitor.

12.0 Food Safety

12.1 Training and competency

Whether direct or embedded supplier relationships, the catering team will be monitored by the company to ensure adequate levels of competency are maintained. As a minimum this will include:-

- The appointed Head Chef holding a minimum of the Level III Advanced Food Hygiene Certificate
- The appointed Kitchen Assistants should all be trained to Level II Food Hygiene
- Training of catering staff in Hazard Analysis Critical Control Points (HACCP) system of food hazard awareness.
- All staff to have relevant Control of Substances Harmful to Health (COSHH) training provided internally and externally.
- Ensuring that all catering staff have clearly allocated responsibilities as described in comprehensive Job Descriptions, which they understand and implement as per established procedures.

- Maintaining records of training.
- Conducting ongoing refresher training through frequent training sessions.
- Health and Safety meetings to be held at least termly and any recommendations to be acted upon.
- Allergen training to be conducted for all staff and that sufficient allergen controls are in place as defined by the company.
- Staff to be trained in firefighting / evacuation procedures.
- All staff to be trained in electrical safety.
- Updates on new legislation / health warnings to be issued at particular times of the year such as Noro Virus, E.coli updates.

12.2 Infection Control for Food Handling and Catering Staff

Food handlers and catering staff may present a particular risk to the health of the customers and staff if they become infected (or have close contact) with diseases that can be transmitted to others via the medium of food or drink. These diseases commonly affect the gastrointestinal system (stomach and bowel) and usually cause diarrhoea or vomiting, or both.

Food handling staff suffering from such diseases will be excluded from all food handling activity in the company setting until advised that they are clear to return to work.

The company or embedded supplier should notify their local Environmental Health Department immediately that they are informed of a member of staff engaged in the handling of food has become aware that he or she is suffering from, or is the carrier of, any infection likely to cause food poisoning.

Food handlers are required to inform their employer immediately if they are suffering from:

- Typhoid fever
- Paratyphoid fever
- Other salmonella infections
- Dysentery
- Shigellosis
- Diarrhoea (cause of which has not been established)
- Infective jaundice
- Staphylococcal infections likely to cause food poisoning like impetigo, septic skin lesions, exposed infected wounds, boils
- E. coli VTEC infection.

13.0 Monitoring and Evaluation

Monitoring and evaluation of the progress made by the company in implementing the aims and objectives of this policy will be made by the Head of Catering, ALG.

In addition to general procedures, staff presentation and hygiene systems will be continually monitored either via internal monthly management checklist, internal bi-annual audit and third party audit systems. Systems will be established to ensure sharing of information to confirm the following minimum standards:-

- Ongoing consideration of healthy eating options.
- HACCP (Hazard Analysis and Critical Control Point) system is in place, and effective.
- Monitoring of staff in order to ensure that food safety and management procedures are followed without exception.
- Compliance with a daily cleaning and disinfection regime.

- All staff wearing their appropriate uniforms and protective clothing at all times when they are in areas where food is prepared and served.
- Ongoing compliance with the hand-washing or hand cleansing regime at all times.
- Inspections, temperature checks, where appropriate, and signs for all incoming supplies and stores before acceptance.
- Rejection of any non-compliant items.
- Arrangements established for the safe transit and proper storage of food supplies.
- Inspection systems of all areas where food is prepared, served and consumed for cleanliness and hygiene at both the start and end of every meal.
- Monitoring of the dining areas, counters, cutlery etc, together with the containers and bins for waste food throughout the service of every meal.
- All spills are dealt with promptly and safely.
- Checking (and recording) the temperatures of the hot and chilled service counters on a daily basis and report any faults promptly.
- Checking all kitchen equipment on a daily basis in order to ensure that it is functioning properly, and keeps a record.
- The company will undertake an annual gas inspection of all its catering facilities.
- Temperature checking systems with a probe of all High Risk items that are being cooked.
- Arranging routine deep cleaning and a high level cleaning of all cooking, food preparation and storage surface areas on an annual basis.
- Ensuring that the company has a pest control regime is in place.
- Arrangement of hygienic disposal of waste in accordance with recommended practice.
- Support in the management of a recycling regime for: paper, card, clean glass and clean tins in accordance with the company's recycling policy.

Ownership and consultation	
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