Aspens Allergen Policy

Aspens firmly believes in providing high quality food to our customers and clients that is safe to eat.

We are therefore committed to reducing the risk to our customers with regards to the provision of food and the consumption of foods which could lead to an allergic reaction.

Aspens accept its duty to comply with all relevant Food Regulations, which states that allergen information must be provided on all food sold.

Policy Statement

Aspens acknowledges that the successful implementation of this policy and management of allergens requires commitment and support from all employees. To achieve this the Company will:

- Work closely with our supply chain to ensure accurate information on all products that may contain allergens.
- Maintain a database of all our recipes, clearly listing ingredients and highlighting those containing allergens.
- Work closely with our clients to meet the updated guidance for Allergen Safety in Schools (revised July 2026) effective from September 2026.
- Display signs that encourage our customers to ask about allergens in the foods being served.
- Ensure that our staff have the necessary training and access to information to provide our customers with accurate guidance on allergens.
- Through good hygiene practices and adhering to Hazard Analysis and Critical Control points (HACCP), reduce the risk of cross contamination in our kitchens.
- Audit our operations to ensure the above policy and practices are working effectively and review the policy, as necessary.
- Work closely with Worcestershire Regulatory Services in the development of company policy and procedures.

Aspens is proud to be a corporate partner of the Natasha Allergy Research Foundation and actively promotes their Allergy School to our clients.

V7 September 2026

Responsibilities

The responsibility for allergen safety rests with everyone, from the CEO, Directors, Operations Team throughout to each individual employee. This sections sets out the responsibilities under this policy

The overall responsibility for allergen safety with Aspens Services rests with the Chief Executive Officer.

The Chief Executive Officer (and any future or replacement Director of the company) is responsible for ensuring the establishment of an effective Allergen Safety Policy within the company and for publicly supporting all persons carrying out the policy and its objectives and ensuring standards of safety are continuously improved by promoting a positive safety culture within the organisation.

To ensure that sufficient resources, both financial and physical, are available so that the policy and its arrangements can be implemented effectively. The Chief Executive Officer may delegate duties to employees who will provide support to meet these responsibilities.

Delegation of the individual duties and responsibilities to employees or any other third party does not in any way detract or remove the ultimate responsibility and duty of care placed on the Company or its Directors.

To ensure the periodic review and appraisal of the effectiveness of this Policy and ensure that any necessary changes are made.

To ensure that this policy and the programme of implementation are understood at all levels through the commitment of adequate training resources and effective communication.

To ensure that responsibility for allergen safety is properly assigned and accepted at all levels and that these areas of responsibility are periodically reviewed.

The Joint Managing Directors of the Company will:

- Ensure the development and review the Company Allergen Policy.
- Ensure that the necessary resources are available for implementing the Allergen Policy and detailed arrangements, and the subsequent monitoring of performance.
- Ensure that the appropriate information, training and supervision is provided to all employees.

The Food Department will:

- Effectively communicate the Allergen Policy and procedures to all stakeholders.
- Ensure all menu cycles are supported with accurate recipes and allergen information.
- Ensure all recipes have the relevant allergen information.
- Ensure that suppliers provide accurate allergen information for products on the Company Approved Product List (APL).
- Ensure that any changes to products and recipes are communicated to all relevant Managers.
- Manage the labelling systems to ensure compliance with Natasha's Law
- Provide allergen safe menus for primary schools
- Support with the completion of menus for students with more complex dietary requirements.
- Provide additional support at Unit level where necessary with regards to menus.
- Work with Added Value Enterprises (AVE) in managing the supply chain with regards to Allergens.

The Operations Team (Regional Operations Directors/Regional Operations Managers/Operations Manager/Area Support Managers/Group Managers) will:

- Ensure that allergen policy will be implemented during mobilisation as outlined in the arrangements section.
- Ensure that all units have implemented the Company Allergen Policy and Procedures.
- Where necessary, with the Catering/Chef Manager, meet with Parents of RED category students to discuss and agree requirements where appropriate.
- Ensure a copy of this policy is shared and explained with the client.
- Discuss with the Client any issues concerning the means in which information regarding students with allergens is communicated to the Catering/Chef Manager, the identification of them, and agreeing a solution to ensure that the allergen procedures can be fully implemented. Agreed actions will be recorded in writing, using the Alternative Menu Form where applicable. Ensure that the client is kept informed of the outcome of any meetings with parents concerning special diets.
- Ensure that all checks and audits are completed by the Catering/Chef Manager and is reviewed to ensure compliance with this policy
- Ensure all training is completed and up to date.
- Investigate any breaches to this policy within 1 working day of notification.

The Catering Manager/Chef Manager will:

- Ensure that the Company Allergen Policy and procedures are followed at Unit level.
- Implement the Allergen HACCP, ensuring all controls in place.
- Liaise with the school to identify the students who have special dietary needs and use the school's procedures to identify them (wristbands, lanyards etc).
- Where necessary, with the ASM/Operations Manager, meet with any parents to discuss any individual student requirements.
- Ensure that the client is kept informed of the outcome of any meetings with parents concerning special diets.
- Ensure that where there are any RED category students the correct procedures are followed at all times.
- Enter student information onto the Unit cashless system, where relevant.(secondary schools).
- Ensure all staff are aware of all information relating to students and their allergies.
- Purchase correct products as per the company recipes and company APL.
- Follow all recipes to ensure allergen information is accurate and up to date.
- Complete the allergen matrix when producing dishes, using information from recipes and ingredient packaging.
- Ensure that allergen matrices are reviewed and kept up to date to reflect any changes to recipes.
- Ensure all allergen matrices are signed and dated when completed and/or reviewed.
- Ensure that any pre-packaged direct sale foods are correctly labelled to comply with relevant regulations (Natasha's Law.)
- Check product packaging before use to ensure allergen information is correct
- Complete all company allergen training within given timescales.
- Ensure all unit staff have completed the requirements allergen training, within given timescales and record on their Training Record Cards.
- Support the School/Academy in the implementation of their own Allergy Procedures.
- Complete all allergen checks and audits within given timescales and follow up on any actions.
- Immediately report any concerns, issues or incidents to their Operations Manager.

All Company Employees will:

- Ensure they have completed all allergen training in given timescales.
- Ensure that they follow the correct procedures detailed in the Allergen Policy and procedures to ensure the safety of students.
- Cooperate with the company on matters of allergen management and control.
- Report any concerns or issues to their manager.

The School/Academy will:

- As data controllers, collect information of students with food allergies and intolerances, ensuring this information is kept up to date.
- Provide the Catering Manager/Chef Manager with an up-to-date list of students with any food allergies, intolerances or dietary requirements.
- Ensure that any communication between parents and the caterer goes through the School/Academy and be involved at each stage.
- Provide an individual allergen plan for students with food allergy
- For primary/infant schools, ensure that the School/Academy has a formal, robust process of identifying students with special dietary requirements, such as lanyards or wrist bands.
- Ensure that all staff and lunchtime assistants are adequately trained on allergens and school procedures.
- Educate pupils about allergies and to support peers with special diets.
- Provide the Catering Manager/Chef Manager with information relating to the school Allergy Procedures/Policy.

The Parent/Guardian/Carer will need to:

- Inform the School/Academy of their child's allergy as soon as possible.
- Complete the Alternative Menu Form and return to the school, providing medical support for food allergies, where necessary.
- Where necessary meet with the Operations Manager/ Unit Manager to discuss any specific requirements relating to their child's allergy. Information from these meetings to be recorded on the Alternative Menu Form by the Operations Manager/Unit Manager.
- Inform the School/Academy of any changes to dietary requirements.

The Student will:

- Work with the catering team to follow agreed procedures relating to foods.
- Take care to knowingly avoid any foods which may cause an allergic reaction.

In order to assist the company in the organisation and management of food safety Aspens will seek external support to provide the necessary information, advice and assistance to comply with current Allergen Safety Legislation.

Arrangements for Schools/Academies and Colleges

This section defines the procedures of allergen safety related issues and areas of risk that apply to the company's work activities. It is the responsibility of all employees to observe these rules and procedures and carry out their work in a safe and reasonable manner.

The Company acknowledges that this policy cannot be achieved without the co-operation and commitment of all relevant parties at all levels, requiring effective means of communication.

The Company believes that the most effective way to ensure the successful implementation of this policy is to designate roles and responsibilities to relevant employees within the company.

It is important that everyone in the company understands they have a responsibility and accountability in implementing these arrangements to keep all students safe.

The company does not endorse a 'nut free' environment. This advice is consistent with external governing bodies and charities who consider this claim is artificial and can create a false sense of security.

However, within primary schools the company does not use products that contain nuts as an ingredient, and products that manufacturers declare a 'may contain declaration.'

Within secondary schools the company does not use products that contain nuts as an ingredient, however, will on occasion use products with a 'may contain' statement or 'produced in a factory that handles nuts.' These products are not suitable for students with nut allergies. This policy will only be changed, such as 6th Forms, with written confirmation from a client. At no time will the company make a free-from claim.

The successful implementation of the Allergen policy requires the support and cooperation of Company Directors, Food Team, Operation Managers, Catering Managers/Chef Manager, all employees, The School/Academy, The Parent/Guardian/Carer and the Students.

This policy must be read in conjunction with the Allergens Procedures Guide and Allergen HACCP Booklet.

Failure to follow the allergen procedures will be deemed as a breach of Company policy and result in disciplinary action which could result in dismissal as gross misconduct.

To ensure the successful implementation of the Company's Allergen Safety Policy, the following provisions are established:

The Allergen Safety Management System

The company's allergen safety management system is the mechanism in which the Allergen Safety Policy is achieved.

The allergen safety management system comprises the following:

- The Allergen Hazard Analysis Critical Control Booklet
- The Allergen Safety Guide
- Compliance Records either digital or paper

The Allergen Hazard Analysis Critical Control Booklet (HACCP)

The HACCP is a systematic preventative approach to allergy safety identifying significant hazards and the processes to control them including critical control points and record keeping .

The Unit Manager is responsible to ensure that the Allergen HACCP is implemented fully into their units and formally reviewed at the beginning of each term. This review is documented on the HACCP sign off sheet and an Action Plan completed if necessary.. Completed copies are filed in the relevant section of the Allergen Folder.

The Allergen Safety Procedures

This document details the actions and procedures supporting the Allergen Policy and HACCP process.

Records

The company records various controls as required by the HACCP process such as alternative menu forms, Allergen Diet Double Check Sheet, Termly Allergen Checklist, allergen matrix. These may be digital or paper.

Mobilisation of new business

Due to the nature of the business Company's work the Company will take on the management of existing workplaces and employees, (via TUPE) it is important that a mobilisation procedure is followed to ensure that all new students' dietary requirements are identified prior to the go live date. In order to achieve this the following process must be followed:

- Allergen policy and alternative menu form shared and discussed with the client.
- Current student allergen information received from the school (this does not need to be on the company form)
- Set up Allergen Folder set up

Primary schools

- Students categorised (RED, AMBER, BLUE) and actions identified and recorded
- Allergen menus or bespoke menus completed for students.
- Parent meeting arranged, where necessary
- The student identification process discussed and agreed with the client.
- All staff briefed on unit procedures, student identification, special diets arrangements and allergen matrix

Secondary schools

- Till system reviewed and checked for student information
- Understanding of how the till system information is maintained (via SIMS or manual input)
- All staff briefed on unit procedures, student identification, special diets arrangements and allergen matrix

Arrangements in Primary Schools

In order to ensure that the safety of students the following procedures categorises students depending upon their needs:

- **RED** severe reaction/anaphylactic symptoms disclosed.
- **AMBER** food intolerance
- **BLUE** excludes foods due to lifestyle preference.

- **RED** may have an agreed menu with the meal being plated.
- **AMBER** will be a suitable meal served from the counter or from the allergen safe menu depending upon the parents wishes.
- **BLUE** will be a suitable meal served from the counter.

Prior to the beginning of each term the school must provide the Catering/Chef Manager with written confirmation of the allergen and special diet requirements for the students that have allergies or dietary requirements. For new intake students this information needs to be provided by the end of July to allow sufficient time to identify student dietary requirements before September. In addition, the school must provide this information for new students or any changes throughout the year. Without written information it may not be possible to safely feed a particular student or only offer a limited menu choice.

Ideally this information should be provided using the Company's Alternative Menu Form and signed by the student's Parent/Guardian/Carer and supported by medical evidence where appropriate. In line with the company's GDPR policy, any medical evidence supplied and shared will be returned to school and not held on file; any electronic copies will be deleted. The information on this form will be used to categorise the student's dietary needs. A photo of the student should be supplied as well.

If a student is categorised as **RED**, depending on the allergy, then a member of the Operations team/Catering/Chef Manager may need to meet the parents/guardian/carer to discuss the students' needs and agreed actions in other to minimise any risk: this may result in an individual allergen safe menu being agreed for the child.

The company offers two categories of allergen safe menus, which are managed by the Food team. These are:

Allergen safe menu(s) which excludes the 14 legal allergens and aligned as closely as possible with the main menu

Bespoke – if sits outside the 14 then a menu tailored to their needs (one choice only)

If a bespoke menu is required, it will be assessed by the food team/AVE based on a risk assessment. The risk analysis looks at the students' requirements, the capability of the kitchen and school environment, to determine the risk level. If the risk level is high it may not be possible to provide a meal safely, and this will be discussed with the parent/guardian and school/academy as soon as possible.

All bespoke menus are provided by the Food Team and signed off by AVE Head of Nutrition; this will include the menu and supporting recipes. This should be double checked and then agreed with the parent/guardian.

Under no circumstance must a bespoke menu be compiled by anyone else.

All information to be documented on the Alternative Menu Form and include permission to share any information with the catering team. As each stage is completed the Special Diets Procedure Tracker should be signed off. Until this process has been completed the student may only be offered a safe meal such as jacket potato and fruit or are to supply their own packed lunch.

To ensure that this information is clearly communicated to all of the catering team, it should be transferred on to the Student Dietary Requirements Summary Chart for staff to refer back to.

Category Controls for RED students with individually agreed menus

Once the procedures above have been followed and an individual menu agreed for the student the following controls must be in place at all times

The Catering /Chef Manager must communicate to the kitchen when food for **RED** category students is being prepared. Where possible this should be in a separate area, if this is not possible then separated by time from other foods containing allergens. Prior to preparation the area and all equipment must be thoroughly cleaned using the 2-stage cleaning method and/or dishwasher to prevent cross contamination.

When preparing the meals, the Catering/Chef Manager must thoroughly wash their hands and wear a disposable plastic apron over their uniform to prevent cross contamination. (The same control used when handling raw meat should apply). Care must be taken at all stages to prevent any allergen cross contamination including storage of ingredients, preparation, cooking and service.

Once completed the meal (main course and dessert) must be plated and double wrapped in cling film, clearly labelled with the student's name, year group and dish description. If the cling film at any time is torn, removed or damaged the meal **MUST NOT** be served and immediately disposed of. It is the Catering/Chef Manager's responsibility to check the dish before service to ensure that it is correctly covered and labelled.

The meal must be clearly identified to the members of staff responsible for serving the student. This information must be communicated directly to the staff by the Catering/Chef Manager during the pre- service briefing.

The meal must be served directly to the student by the nominated member of staff responsible for serving the student.

The Allergen Safe Diet Double Check Sheet must be signed by the person who has prepared the meal, a person who has checked and the person who has served the meal. A master copy of this can be found in the Unit Allergen Folder or on the company intranet. These must be retained for 6 weeks.

It is for the student's safety that the above procedures are followed at all times, if at any time this cannot be followed then the Catering Manager must agree an action with the school.

At no time should a **RED** student, with an agreed menu, be served food from the counter due to the risk of cross contamination.

AMBER & BLUE Controls

Students that are in the **AMBER** or **BLUE** category can be served from the counter ensuring that they are served the correct meal, as ordered by parent/guardian. Some students that are **AMBER** may be served meals from the allergen safe menu if requested by a parent. In this situation they would be treated as a **RED** student. The Catering/Chef Manager must inform staff before service.

Delivered Services

For delivered Services the above procedures must be followed for **RED**, **AMBER** & **BLUE** students. Any **RED** meal needs to be double wrapped in cling film and transported to avoid cross contamination, ideally in a separate container. If this is not possible the parents of **RED** students must be made aware of transport arrangements and agree that they are sufficient. In addition, a completed, accurate Allergen Matrix for all dishes must accompany the food being delivered for service. The matrix must be completed and signed by the production kitchen and handed to the service employees, who must sign upon receipt.. This matrix must be kept for a period of 6 weeks.

Arrangements for Secondary Schools/Colleges

In secondary schools to support this transition, the company does not prepare managed medical diet menus for secondary age pupils. Instead, our focus is on supporting pupils with medical dietary needs so that they can make safe choices. To support the secondary student to take control of their medical dietary needs, we make sure we:

- Adhere to strict food safety regulations – including transparency around the presence of the 14 legal allergens in every dish on our menus
- Encourage pupils to ask our teams about allergens
- Provide additional support on a 1 to 1 basis if required

In secondary schools student information needs to be entered on the till system allowing student dietary requirements to automatically be identified at point of sale. This information must be followed at all times.

Allergen Matrices and Labelling

Any allergens contained within the food produced on site must be clearly communicated to any customer upon request. This information is produced in the form of an allergen matrix and must be available for all foods in all service areas.

An accurate allergen matrix must be available for all foods served. The relevant/daily allergen matrix must be displayed on the orange clipboard in each service outlet.

Allergen matrices for lunchtime service are completed at the time the menu is produced for the first time and then are reviewed/updated each time the dishes are prepared within the menu cycle. The matrix must be signed and dated at each review.

Allergen matrices for services such as cold deli, hot deli, cakes must be reviewed as required to ensure that they are accurate at all times. The matrix must be signed and dated at each review.

Food Labelling Regulations 2021 (often referred to Natasha's Law) requires that any pre-packaged direct sale foods(PPDS) are clearly labelled with the following:

- The food name
- Full list of ingredients with the allergens emphasised

Within the business this will include foods such as sandwiches, baguettes, salad boxes, dessert pots, burgers and wraps, that have not been pre-ordered. Natasha's Law will mainly apply to the secondary school sector of the business as the majority of primary school pre order meals.

The company has an approved range of foods that are defined as PPDS. These foods are supported by standard recipes and ingredients which will allow an online labelling system to produce ingredients labels that comply with the requirements of the law.

It is important that all foods be labelled to identify if they contain any of the key allergens, therefore all in house produce will be labelled with the appropriate allergen label when stored in the fridge, freezer or dry stores. In addition, any foods that have been decanted from the original packaging will need to be labelled with the appropriate allergen label. Foods still in the original packaging do not need an allergen label as the manufacturer's information is available, even if opened, however they still need to be date labelled.

The Allergen Notice must be clearly displayed in a prominent position in all service areas instructing customers to ask a member of the Catering team about allergens in the food that is produced on site.

Hospitality Catering

Where possible it should be established at the time of booking if any persons attending have any allergies or special dietary requirements.

If YES separate foods must be prepared and labelled – following the procedures list in the **RED** category controls section.

An allergen matrix to be completed for each booking ensuring that any allergen information can be accurately communicated upon request. This must detail each item being served.

If the hospitality is taking place during normal service times, then an A5 Hospitality sign needs to be displayed and the allergen matrix in the service area for reference. Hospitality bookings outside of normal service times or in remote locations then the completed, accurate allergen matrix must be sent.

Checks and Audit.

To ensure that all allergen procedures are being followed at all times the Catering/Chef Manager will review the Allergen HACCP at the beginning of each term. Once completed they will complete the termly Allergen Checklist on the mpro5 system. Operations Managers will be able to monitor this confirmation via the mpro5 dashboard. Any issue identified must be addressed immediately with retraining taking place where necessary. Depending on issues identified an allergen investigation may be necessary which could lead to disciplinary action being taken.
Members of the Operation Team will make spot checks on regular visits. Any issues must be recorded and addressed immediately.

Allergen Investigation

Any Allergen incident or near miss must be reported by the Catering/Chef Manager to their Operations Manager and client immediately. The incident must also be recorded on mpro5 via the Near Miss/Incident report flow.

All incidents must be investigated by a member of the Operations Team (with support by other departments) within 1 working day of the incident occurring, in order to establish the immediate, underlying and root causes of the incident. This includes a review of procedures in place, employee knowledge and training and compliance with procedures. Once completed the findings will be communicated to all relevant parties and any required action taken.

Any allergen incident resulting in hospital treatment will be reported to Worcestershire Regulatory Services under the Primary Authority Partnership.

Training

All employees must complete the relevant training necessary to keep our customers safe and support the effective implementation of the Allergen Policy. The Learning and Development Department oversees this training. This includes:

Unit Allergen Procedures
Training for all unit based employees on local allergen procedures. To be completed on the first day of starting.

Grow PRO e-learning. There are 2 e-learning courses which employees complete, these include:

Anaphylaxis Awareness

- Symptoms of allergy reaction and anaphylaxis
- Dealing with an allergy reaction and anaphylaxis
- How to administer an adrenaline device

Allergen Safety

- The 14 major allergens
- Living with an allergy including symptoms and allergies and intolerances
- How to help someone suffering from an allergic reaction
- Managing allergens in the kitchen
- Managing allergies during service
- Company processes

Once completed a 10 question multiple choice test must be passed to check knowledge and understanding, the pass mark is 90%. Employees have 3 opportunities to pass the test before being referred back to the relevant Operations Manager, who must establish the circumstances and provide additional training support before requesting the test be reset. In some circumstances if the test is not passed then an employee may not pass their probation.

Company Allergen Safety Policy and Procedures
This training is completed by all members of the operational team. This training is conducted online in person. This includes:

- Company Allergen policy and Unit procedures, company recipes and allergen matrices.
- Roles and responsibilities in dealing with allergens,
- Primary school Red, Amber and Blue category students and relevant procedures

- Risk of cross contamination when storing, preparing and serving foods and relevant controls.
- Supporting documentation

TAKE-10
Short awareness training completed on site by all unit employees at least once a year

All training is recorded on an employee's Training Record Card (paper & digital)

Documentation

Copies of all relevant documentation can be found in the Unit Allergen Folder or as electronic versions in mpro5 and the Document Library via the Internet. These documents are kept up to date by the relevant Departments.

Aspens operate a Primary Authority Partnership with Worcestershire Regulatory Services who have approved the company's policies and procedures.