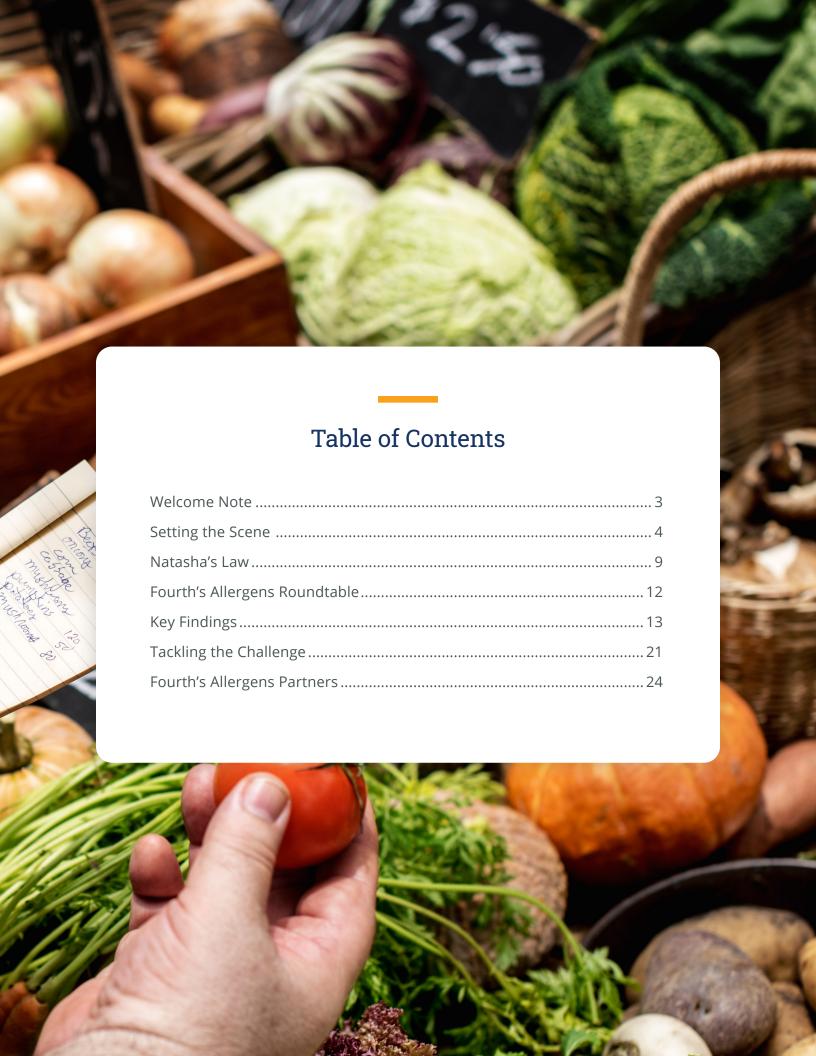


The Allergens Challenge



### Welcome Note

On behalf of everybody at Fourth, I'd like to personally thank you for taking the time to read this report on allergens which, despite the devastating impact of the COVID-19 pandemic, remains one of the biggest operational challenges the hospitality industry currently faces.

Allergens have always been at the forefront of our minds; however, when we held a roundtable discussion with leading industry operators and bodies on the matter in February 2020, nobody could have predicted what was just around the corner. The pandemic, and the trading restrictions and enforced closures it placed on hospitality businesses, has wreaked devastation across our sector, with businesses having to adapt again and again to survive.

Over the course of the past year, the industry has pulled together to tackle these challenges, which is something to be truly proud of. As we cautiously look ahead to a restriction-free world, the importance of tackling the allergens challenge enters the fray once more, with the upcoming Natasha's Law legislation reinforcing the immediacy and importance of the issue.

The topics discussed on the day of our roundtable are as pertinent as ever. We initiated the campaign behind this report to bring the sector together and to establish a series of best practices to guide operators in tackling the allergens challenge. Firstly, we conducted research into the subject, looking at how hospitality workers, consumers and business leaders felt about allergens. The findings, which form the basis of the report you're reading, were alarming and it was clear that something needs to be done.

This issue is our industry's *cause célèbre*. It is clear, from the tragic, high-profile customer incidents that we are all aware of, coupled with inconsistent experiences from venue to venue, that action is critical. Technology is only one part of solving the puzzle; real change requires collaboration and engagement from all areas of the industry, something we're passionate about driving and supporting.



Sebastien Sepierre Managing Director EMEA, Fourth

### Setting the Scene

Despite the difficulties and hardships the past year has brought about, operators are still faced with a number of ongoing challenges that require attention as we move along the re-opening roadmap.

In recent years, food allergies and allergens have been one of the most pressing concerns that hospitality operators have faced, with the fallout from bad practice leading to fatal consequences in some high-profile cases.

In the UK, it is estimated that there are two million people living with a diagnosed food allergy, which equates to roughly 1-2% of the national population<sup>1</sup>.

We are eating a more diverse range of foods than ever before, which has naturally increased prevalence and the likelihood of food allergies developing; however, despite a rise in cases (food allergy hospital admissions are increasing by 4-5% per annum), there have been no changes to fatality rates.

The aforementioned high-profile cases, involving some of the UK's most well-known restaurant and QSR brands, naturally garnered plenty of media attention. One of the most impactful cases has led to the formation of Natasha's Law, which will come into force in October 2021, following the tragic death of Natasha Ednan-Laperouse after suffering an allergic reaction.



<sup>&</sup>lt;sup>1</sup> Steve Wearne, Director of Policy, FSA, Food Allergy and Intolerance Programme available at: https://www.food.gov.uk/sites/default/files/media/document/fsa170306.pdf

Under current laws, food prepared on the premises from which it is sold is not required to display allergen information on its labelling; however, Natasha's Law will tighten the rules by requiring foods that are pre-packed directly for sale to carry a full list of ingredients.

With the significant disruption and damage to the sector caused by COVID-19, accompanied by the upcoming legislative changes, the allergen issue will pose a huge operational and reputational challenge for hospitality businesses, and it is going to require industry-wide collaboration to find the optimum solution.



"When it comes to allergen information and food safety, hospitality operators take their responsibility extremely seriously. The best way to increase transparency and safety is to continue to promote and share best practice to encourage open conversations about food allergens. We need customers to feel comfortable about asking team members about allergens and confident that the information they receive is accurate. This report shows that the industry must continue to work together to drive up standards and, while in these unprecedented times, acts as a reminder of the severity of the issue."

Kate Nicholls, Chief Executive, UKHospitality





"As a Consultant in Paediatric Allergy, my work focuses on the prevention, diagnosis and management of food allergies in children. An area that I've concentrated a large part of my career researching and working on is peanut and tree nut allergies which, like all food allergies, have significantly grown in prevalence over recent years. The prevalence of peanut allergy more than tripled between 1997 and 2008, from 0.4% to 1.4%² of the US population, which can be associated with a wide range of factors, such as the fact we are now eating a more diverse range of foods than ever before.

"Knowing what to do when someone is suffering an allergic reaction is important to swiftly identifying and treating the most severe cases. Typically, the onset occurs within two hours of eating, usually within 20 minutes. The initial tell-tale signs are oral or throat itchiness, nausea and skin swelling.

"A study<sup>3</sup> conducted in 2013 looked at data from 13 different studies describing 240 fatal food anaphylaxis episodes over an estimated 165 million food-allergic person-years, equating to a fatal incidence rate of 1.81 per million cases of anaphylaxis. While a fatality occurring is rare, it's still absolutely critical that allergy sufferers, their parents or carers and hospitality businesses, act quickly and meticulously.

"This is an intricate challenge with a number of different elements. To prevent fatal accidents from occurring, it requires clear communication and collaboration across all businesses to establish, cement and execute best practices. Optimistically, studies, such as this report, demonstrate there is a real appetite and hunger from those within the eating and drinking out-of-home industries, to tackle this challenge, and that brings much cause for optimism."

Dr Helen Brough, Consultant in Paediatric Allergy, St Thomas' Hospital

#### Allergens in Numbers

We commissioned research that takes a deep dive into the current attitudes towards allergies and allergens from hospitality staff<sup>4</sup>, consumers<sup>5</sup> and business leaders<sup>6</sup>. The results painted a clear picture.





<sup>&</sup>lt;sup>4</sup>Responses from 500 individuals

<sup>&</sup>lt;sup>5</sup>Responses from 1,000 individuals

<sup>&</sup>lt;sup>6</sup>Responses from 130 individuals (as part of the CGA Business Leaders survey, in partnership with Fourth)

#### **BUSINESS LEADERS**



64% of leaders regard allergens as a major focus



63% are absolutely confident in their existing approach to allergens



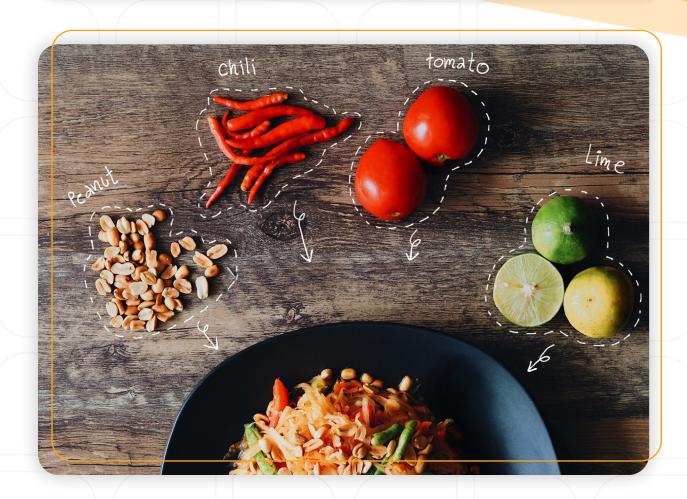
33% are relatively confident in their existing approach to allergens



19% admit to conducting daily training, compared to 18% weekly, 37% monthly and 14% bi-annually



78% think
technology plays an
integral role in tackling
the allergen challenge



# Natasha's Law what do I need to know?



Michael Hordern, Senior Product Manager at Fourth, looks at the upcoming law change making it a requirement for hospitality businesses to list all the ingredients and allergens present in their 'pre-packed for direct sale' food items, but what does this mean for the industry?

Natasha's Law (or the Food Information (Amendment) (England) Regulations 2019), which comes into force in October 2021, will make it a legal requirement for all food retailers and operators to display full ingredient and allergen labelling information on every food item they sell 'pre-packed for direct sale'. These labels must show the full name of the food; all ingredients ordered by weight; and have all allergens emphasised, such as in **bold**, UPPERCASE or a different colour.

While this is without doubt a positive move for the greater good of consumers that should be welcomed, it does create an extra layer of complexity for businesses to ensure they are adhering to the, often confusing, criteria. Hopefully this article will go some way towards helping businesses understand the new regulations.

The gravity of this legislation is highlighted poignantly by the tragic case of Natasha Ednan-Laperouse, who sadly died after consuming a sandwich from a high street retailer that contained sesame seeds, but which did not display allergen information on the packaging. Following a large-scale campaign from her parents, the eponymous law was passed in her memory, to ensure that no such thing happens again. The case clearly highlights the severity and importance of the challenge at hand.

So, what does this mean for operators? What constitutes 'pre-packed for direct sale' (PPDS)? These are the million-dollar questions and the answers are down to a significant amount of interpretation. The accepted definition of a PPDS food item is that it must be prepared, packaged and stored on the same premises from which they are being sold (or via an associated vehicle or stall); an example of this is a baguette that is assembled in the kitchen, placed in a sealed sleeve and stored in a fridge in the shopfront for a customer to grab-and-go – with the full ingredients and allergens shown on the label.

The rationale here is that hospitality is a people business and that, in a restaurant or pub environment, it falls upon the server to check for allergen requirements when serving customers. It's much harder to manage this issue in a high-footfall grab-and-go environment, where customer churn is high and interaction between them and members of staff is significantly lower.

However, there remains plenty of uncertainty around this issue, not helped by the fact that there isn't a set-in-stone legal definition. There is plenty of second guessing around what falls into scope versus what doesn't, which simply isn't helpful or productive at this stage. For example, soup that is made in the kitchen and stored in vats on a counter that the customer helps themself to, or a cake that is stored in a glass case at the till and served by a team member, or a plate of covered hot food at a buffet – would all fall out of the PPDS scope because they aren't strictly sealed food items. This grey area means there are ways to avoid and negate the introduction of clear labelling, and that it would be down to the moral principles of businesses to do the right thing and take the legislation in the spirit it was conceived – to ensure that no one goes out for a meal and doesn't come home again. The stakes really are that high.

The Food Standards Agency website has put together some very helpful flow-charts around PPDS food items, as well as providing guides and diagrams, which should absolutely be the first port of call for unsure operators when ascertaining what does and doesn't require labelling.

Assuming you're a business that does need to introduce new labelling onto products, due to the nature of your offering, you are presented with a number of challenges. The first one is that it's all well and good establishing a full ingredients list for each and every applicable food item, but a key part of food retail is in making packaging as desirable and enticing to customers as possible. It is unclear what impact having a larger label present on a food item will have on customer sentiment, and ultimately sales, but there's little doubt that businesses will not want to take too much away from the presentation of their food items.

There's then the question of where to draw the line when it comes to listing ingredients, as all the 'bought in' ingredients used in a recipe will need to be broken down and their constituents included on the label, creating potential headaches all along the supply chain, in a cascading Inception-like process of ingredients, within ingredients, within ingredients, and so on. For example, if a PPDS lasagne contains Worcestershire sauce, the ingredients label would require it to be broken down to include the ingredients and allergens present in the Worcestershire sauce, creating a potential issue around spacing on the label. Magnify this problem with a recipe that contains more than 20 constituent parts, which all individually have an average of 12 components, and you're running out of label space very fast.

It's also going to be of vital importance that the most up-to-date label is always used on food items as, if a recipe changes and different ingredients are used and this isn't reflected on the label, the entire process will be rendered pointless and potentially dangerous.

What can be done to help the process? Manually tracking every ingredient used across a dish, which could have an evolving specification, simply isn't feasible – you have to use technology. As already alluded to, there is significant scope for human error with a manual process, that is almost entirely eliminated through the adoption of automated procedures, with the necessary human checks and balances. At Fourth, our systems enable customers to gather digital ingredient lists from manufacturers and suppliers for the products they buy, using any of the existing data-capture approaches offered by Fourth and by our partners, such as Trade Interchange. We then automatically compile the required full ingredient lists, in weight order and with the allergens emphasised, for all of the customer's dishes. These full ingredient lists are then available for label-printing and digital display via partners like Ten Kites.

Making additions and amendments to labels takes seconds, simply requiring a manual update to the text field, which is then re-automated and ready to print. This solution is an example of collaboration across the sector, combining our solution with Ten Kites' to establish a simplified process. This approach is going to be essential when tackling Natasha's Law and the wider allergens challenge, as only through full synchronisation up and down the supply chain will a workable solution be achieved.

People make the sector what it is, from guests to staff and everyone else involved, and creating positive experiences for all is one of the highest priorities for operators and retailers. The allergens challenge is something that everyone wants to get on top of, to prevent unnecessary tragedies, like the case of Natasha Ednan-Laperouse from occurring again. Natasha's Law is a good thing for hospitality, it just requires collaboration and engagement across every facet, and the acceptance that it's the start of a new journey and will require further engagement, collaboration and refining between all of us, as we leave the planning stage and enter implementation.



### Fourth's Allergens Roundtable

#### The Allergens Roundtable

To get to the root of the allergens challenge, we brought together leaders from across the hospitality industry, including operators, allergens specialists, and technology experts to share insights and best practices from their businesses. The session asked the pressing questions around allergen regulations, established what the industry is currently doing, and set out to adopt a collective approach to implement systems and procedures, ensuring all customers can dine in safety and with absolute confidence.



Rupi Zani Safety and Wellbeing Director, Pizza Express



James Spragg Former CEO, Big Table Group



Mark Jones Experienced Sector CEO



Simon Wilkinson CEO, Byron



Leigh George Head of Endorsements, Allergy UK



Kate Nicholls CEO, UKHospitality



Mark McCulloch Founder, Supersonic



Mark Stretton
Managing Director
Fleet Street Communications



Carol Evans Chief Business Development Officer, Ten Kites



Nick Bracken Food Safety Lead, RA Group



Michael Hordern Senior Product Manager, Fourth

# Key Findings

#### Key takeaways

Despite the significant increase in recent years of allergens awareness, high-profile media coverage of allergy-related deaths, wider dispensing of EpiPens and faster ambulance response times, business leaders discussed how frightening it is that the number of fatalities from allergen-related deaths has remained static over the past 40 years.

It was discussed how allergens continue to be an issue that should be front-of-mind across all levels of hospitality businesses, from the board to the floor, to help prevent tragic deaths and mitigate against the huge damage to a business's reputation and the detrimental impact on team members.



#### **Positive Industry Progress**

Whilst the allergy-related fatalities have generated negative, high-profile press for the restaurant sector in recent years, it was acknowledged how much positive work the industry, including the businesses directly impacted, has done around allergens. It was also noted how challenging it can be for operators navigating the needs of, not just the ever-growing number of people with diagnosed allergies, but also the increasing number of people cutting out foods as a lifestyle choice.

Operators highlighted that, although the continually evolving processes and practices around allergens legislation is a big challenge for them, they felt the pressure for some independent operators, who don't have big teams or the systems support of working with companies, such as Fourth or Ten Kites, was immense, with a high risk of incidents occurring. Concerns were also raised about the compliance challenges that Natasha's Law will present to independents, given the challenges and significant costs experienced by operators, in adhering to the requirements. But Kate Nicholls reassured the panel that necessary work will largely be around business process, rather than costly labelling and changes to the menu.

#### **Clearer Legislation**

Many felt the foodservice industry needs more robust and clearly defined allergens legislation, something that Natasha's Law should introduce. It's also felt that a consistent industry approach should be introduced, around how legislation is interpreted and the processes operators put in around it, so customers know what to expect across all venues.

#### Consistent Approach to Menu Labelling

Kate Nicholls said a commonality of approach on menu allergen labelling was needed, as the inconsistent way information is provided to customers can often be confusing. She also felt a central industry approach to digital allergen information, including apps, would help fend off more intrusive legislation.

Full ingredient disclosure, which has been introduced at Pizza Express, was felt to be the most effective way of preventing incidents, but the time, cost and robustness of supplier information needed were seen as barriers to operators actively adopting this approach at present.



"I think the industry has done an awful lot. I'm amazed at how far we have come and the great work we have done. With the journey the industry is going on, there is also this added complication of lifestyle choice versus allergies."

Mark Jones, Experienced Sector CEO

#### Balancing Act: Customer vs Operator Responsibility

A key part of the discussion focused on whether consumers with allergies are doing enough to protect themselves when dining out, by highlighting their allergies to staff, asking to check allergen guides and carrying EpiPens with them in case of a reaction.

Some operators felt, in the recent and ongoing legal cases, that the responsibility has shifted disproportionately to the hospitality industry and the balance isn't right at present, with so much fear now existing within teams about serving customers with allergies.

Kate Nicholls highlighted that court cases broadly take into account the systems, processes and due diligence operators have got in place and then mitigates against them. If a customer hasn't followed those protocols, it doesn't necessarily come down on the business.

#### Easy to Ask: Young Diners Must Speak Up

Operators discussed how more still needs to be done to help destigmatise food allergies, to help customers take more responsibility for themselves.

Allergy UK's Leigh George highlighted it is still 16-24-year-olds who remain at the biggest risk of harm, as many are too embarrassed to highlight their allergies to servers.

The Food Standards Agency has been tackling this issue through the return of its 'Easy to Ask' campaign, which urges young people to ask about allergens when eating out. Other ideas discussed, to help drive more customer responsibility around allergens, included industry adverts to help educate consumers that the issue isn't a one-way street.



#### **Asking About Allergens**

Many operators, including Byron, have front-of-house staff asking customers at the table if they have any allergies, but experiences were also shared of customers feeling uncomfortable with this, or staff forgetting to ask and getting it badly wrong through fear. Diners could end up being questioned several times or asked at the wrong stage of the customer journey, resulting in a negative impact on their experience.

Others shared how they had moved away from asking, as mystery visit reports showed poor staff adherence to it, which they felt left them exposed. Others felt that scores gave operators the opportunity to take action to improve adherence at sites performing below a set threshold, enabling them to manage the challenge amongst non-compliant team members.

Concerns were also shared that with the industry's high staff turnover levels, and team members often not speaking in their first language, leaving the emphasis on staff to ask and answer queries about allergies was an uncomfortable place for the industry to be.



"We're against putting more and more responsibility onto our teams and we are trying to rebalance it. It is that shift to "you tell us and we will work out what we can do for you", as opposed to guests coming in and expecting our team members to be mind-readers."

Rupi Zani, Safety and Wellbeing Director, Pizza Express

#### **Encourage Sharing of Allergen Information**

Sharing as much menu information on allergens as early as possible on websites and apps, so customers can make informed decisions on where to dine, was discussed as another effective way to start to shift the balance of responsibility more towards the customer.

Featuring QR codes on menus linking to allergens information, which encourage customers to check information themselves, was another recommended tool.

Offering signage to help prompt customers to mention allergies is the approach being taken by restaurant operators, including Pizza Express. Following insights from their Irish restaurants, a country where allergen incidents are negligible and legislation is framed that consumers need to tell the business about their allergies, the operator is testing 'table talkers', which asks allergy sufferers to talk to front-of-house teams.

Leigh George from Allergy UK said that, in the Chloe Gilbert case (the 15-year-old who had a severe dairy allergy and died after eating a take-away kebab with yoghurt), if there had been a notice saying 'make sure you ask about allergens', she may have checked.

#### **Mandatory Staff Training**

Many felt, whilst key that customers take more personal responsibility for their allergies, more also needs to be done to remove the opportunity for team members to make wrong decisions, including regular staff training.

Fourth research highlighted that almost 70% of hospitality staff want more allergens information and training and a quarter said they don't feel confident advising guests.

It was felt by many that mandatory, standardised, accredited allergens training would benefit the industry's largely transient workforce, by helping reduce fear through knowledge, and helping to create a culture of anyone going into the food industry having a basic level of certified knowledge.

Recommendations were made that such training could be refreshed yearly, due to regular changes in allergens information, and that if standardised training was created, that it ideally would be something that operators could layer their own brand values over. But Kate Nicholls felt that pushing the government for mandatory allergens training would take away the responsibility of doing what works best for individual businesses and would open up the possibility of further mandatory front-of-house training.



"Operators need to challenge themselves as to whether they are doing enough to get away with it because it suits them, or if they are truly customer centric around allergens."

Mark McCulloch, Supersonic Inc

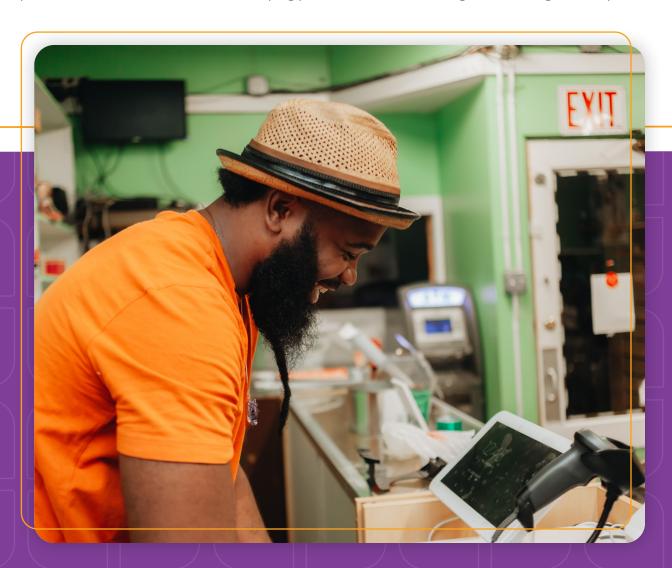
#### Menu and Process Training

Training on menus was perceived as key, but there was also a view from some that responsibility around allergens should be taken further away from front-of-house staff, with more focus put on knowing the process to follow, rather than allergens training. Many felt it is critical that staff feel confident saying they don't know the answer and will check with the in-house allergens expert, often the manager, which there should be at every site.

Other best practice ideas included chefs discussing allergen needs with customers at their table, which would help deliver an excellent customer service and lead to increased loyalty, but the labour costs involved were highlighted as a barrier for many in adopting this approach.

#### Technology Plays Vital Role

Operators all felt technology has a critical role to play in managing allergen risks moving forwards, with tech enabling responsibility to be managed at a higher level. Tech was wanted to help support in areas, including sharing correct information in a timely manner, around ingredient substitutions, product recalls and withdrawals and helping provide an audit trail of ingredient changes in recipes.



#### **Delivery Confidence**

Many felt the industry remains very vulnerable to allergen incidents with delivered food, with lots of operators featuring disclaimers saying they can't guarantee deliveries are allergen-free. While some operators, like Wagamama, choose not to serve allergy customers at all through delivery aggregators.

It was felt that further work is required in order to get delivery platforms to step up and take more responsibility around food safety, as they see themselves as tech companies rather than food handlers. Kate Nicholls said the government and FSA are increasingly taking the view that these food delivery companies are food processors and should be subject to food safety legislation, but at present it isn't clear in the UK or EU law what they are as platforms and this needs to be tightened up.

#### **Marketing Opportunity**

Discussions focused on the commercial opportunity of becoming a venue of choice for people with allergies and marketing your business as a safe place to eat for these consumers, with experiences shared showing customers with allergies (and their family and friends) gravitate towards venues that really take the issue seriously.

But the general view was that there is still too much fear, not enough guidance and legislation or understanding from customers, for operators to put themselves out there and make these claims, with gluten-free felt to be the only potential area where this 'safe here' claim was possible.

It was discussed that operators need to challenge themselves to think about whether they are 'just doing enough' on allergens, or if they are truly customer-focused on the issue. Ideas for engaging more with this customer group included talking to customers with allergies as part of a loyalty programme, personalising marketing messages or targeting them with positive messaging on social media.

#### Allergen Awareness Accreditation

Gaining accreditation for your business for best practice around allergens, such as Allergy UK's Allergy Aware Scheme, was also recommended to help signpost consumers to these restaurants. Introducing an industry-wide Scores on the Doors scheme for allergen awareness was also perceived by some as a positive idea to recognise businesses putting excellent focus on the issue.

#### Holistic Approach

Overall, the feeling was that a holistic approach was needed for operators, their teams and consumers, to better tackle the allergens challenge. This includes clearer guidance from government, a uniform industry approach to allergen labelling on menus, more technological solutions, and staff trained to ask in-house experts about menu queries. Furthermore, greater responsibility must also be placed on sufferers to check out menus before visiting, telling staff about their allergies and asking about dishes, checking allergy guides and carrying EpiPens.



#### Distance Selling and Allergens

Throughout the pandemic, consumers have turned to delivery and meal kits to satisfy their cravings for 'out of home' dishes, ordering in or re-creating their favourite dishes in the comfort of their own homes. This process is what is referred to as distance selling, which is the indirect selling of products, including those sold online, via an app or over the phone.

It is a legal requirement that any food item supplied through distance selling methods should meet the same information requirements as food items sold in shops. This means that delivery services, meal kits and online food stores will be required to provide clear allergen information on their products, both before sale and on delivery of the product.

At point of sale, it is mandatory that allergen information is clearly visible on the website, menu, app or described over the phone. Having a clear allergens list is not only a legal requirement, it will also make allergy sufferers feel more confident when ordering. It is also at this stage where, if specific dishes cannot be guaranteed to be free of certain allergens, that this is made clear to customers. For example, if chips are fried in the same oil as flourbattered fish, then customers need to know.

When it comes to the delivery phase, it is the physical labelling on the packaging that needs to be considered. Operators should consider using stickers or menu notes that reassure customers of the presence of any allergens; similarly, providing a verbal rundown of the order to the customer at the door could be an option in some cases.

### Tackling the Challenge

#### Technology

- EPOS and back-of-house stock recipe management systems are one way of ensuring that the allergen information is accurate and up-to-date. The main issue is to ensure that the data that is input into the system is accurate and updated on a regular basis.
- Technology also provides the opportunity to use menu apps. The customer can use the app to search for a particular dietary requirement, such as GF, lactose free, nut free etc. The app will filter the most suitable dishes from the menu. The restaurant must be able to provide regular updated allergen and ingredient information to the app developer, otherwise there is a risk that the ingredients information has changed and the information on the app is not accurate.
- QR codes the customer can scan the QR code and a PDF document will provide the relevant ingredient and allergen information.
- The technology will provide the customer with allergen and ingredient information. It will not
  provide information on any risks associated with the potential for cross-contamination during
  the preparation and cooking process. It is always recommended that the customer should
  have a conversation with the restaurant manager to ensure that any concerns are raised



#### Operations – protocol in the restaurant

- A pro-active approach to managing allergens is recommended. When the customers are placing their orders, it is best practice to ask at this stage whether anyone has any allergies.
- When customers are booking a table in advance, it is best practice to ask when taking the booking if any guests have any allergies the restaurant should be aware of. If the customer is booking their table online, there should be an opportunity at this stage for the customer to note any guests with allergies on the booking form.
- The orders for the allergy customer must be highlighted on the order pad and brought to the attention of the chef when placing the order.
- The allergen-free meals must be prepared separately and the cooking method must ensure that the risk of cross-contamination is minimal.
- When serving a table, it is recommended that any orders for the allergy customer should be served first to avoid mistakes.

#### Delivery

- When taking a telephone order for delivery, it is recommended that the customer is asked whether there are any allergies the restaurant should be aware of. If a customer is placing an order online for home delivery, there should be the opportunity to prompt the customer to state whether there are any allergy requirements to be aware of.
- It is best practice, where possible, to label a dish for a customer who has ordered allergen-free options for example, by using a label saying "Gluten Free Pizza" to ensure the meal is given to the correct recipient. Where possible, businesses should add the customer's name for example, "Gluten Free Pizza Anna".
- All orders which are allergen-free dishes must be placed on top of other others to reduce the risk of cross-contamination in the event of a spillage.
- The use of tamper evident labels on the containers will ensure that the product has not been tampered with during delivery.



#### **Customer Communication**

- The signage in the restaurant should be clearly visible and should be worded in a positive manner to encourage a conversation with the allergy customer. For example, signage such as, "if you have a food allergy please speak to a member of our team who have all been trained and are happy to help you". This will encourage the allergy customer to speak to the team rather than trying to self-manage their meal choice.
- The menus should be available online with information clearly available for customers with allergies. It is recommended that the allergy customer will have access to specific allergenfree options so that the customer can filter the choices available according to their dietary requirements.
- The customer will be reassured if you adopt a proactive approach to managing customers with allergies. Do not treat them as an inconvenience, they represent a high proportion of the population, if they trust you to cater for them, they will become a regular customer.
- The Allergen Accreditation Scheme will provide the customer with the confidence to eat in an establishment which is a member of this scheme. A robust, independent audit will confirm whether the team are fully aware of their responsibilities, from purchase of products through to service of food to the customer.



#### Training

- It is important that all members of the team receive allergen training appropriate for their role in the business. It is unfair to expect the lowest paid members of the team to take all the responsibility. The allergen training should encourage a positive food safety culture, which includes food allergen safety.
- As a minimum, all staff must have undertaken a basic online allergen awareness course before they start to work in the business. The FSA provides an easy to access online training course.
- The staff members should all attend regular refresher courses, this may be in-house team talks or provided by an external trainer.
- Training will provide the staff members with the confidence to manage any allergen requests from customers. It is the responsibility of the manager to ensure that the team has been provided with the relevant information.

<sup>\*</sup>This section was compiled with the help of Jacqui McPeake, the Founder of JACS Ltd and a specialist in allergens management

## Fourth's Allergens Partners



























#### **About Fourth**

Fourth is the leading digital workforce management, payroll and HR solution for the global hospitality, retail and leisure industries. Fourth's various solutions give businesses oversight of how they can control costs, scale profitability, improve employee engagement and maintain compliance through its leading data and analytics suite. It serves more than 7,000 customers across 120,000 sites globally.

Our cloud-based, proprietary technology platform and fully mobile applications power the world's leading brands, including Itsu, Wasabi, Tesco Family Dining, Bulgari Hotel, Fresh Direct, The Bread Factory, Gail's Bakery, TeamSport Go Karting, Frosts Garden Centres, Legoland and The Wentworth Club.

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